

18th March 2019

Thank you for the opportunity to comment on Greater Manchester's Plan for Homes, Jobs and the Environment, Greater Manchester Spatial framework, revised draft, January 2019.

The following is the response of Manchester Friends of the Earth, a Greater Manchester-based environmental campaigning organisation working on a range of issues that includes sustainable transport, aviation and climate change.¹

Manchester Friends of the Earth welcomes the development of a plan that will shape the region's development over the next 20 years, and seeks to address key issues such as health and well-being, inequality and environmental protection and improvement. We particularly welcome the focus on policies to protect, conserve and improve wetlands and uplands.

Where possible we have responded to the questions as outlined in the consultation document.

In summary, Manchester Friends of the Earth:

- feel the timing of such a quantum of Green Belt release is unprecedented and unjustified; **contrary to the five purposes and in direct conflict with the permanence argument set out in the NPPF**
- supports the idea of “simultaneously” maximising economic, social and environmental benefits and minimisation of adverse impacts, but **do not** support net gains in an environmental context.
- wholly supports new developments being zero net carbon but asks whether too much time is being given for developers to meet the GM 2038 carbon-neutral deadline - the compliance date should be brought forward to 2021.
- believes that the revised GMSF fails to be compliant with NPPF paragraph 134 on green belt purpose and paragraph 136 in terms of ‘exceptional circumstances’ through local plan review. The spatial framework has not engaged (for example as would be required under the duty to co-operate) with the local plans for the areas which it covers, nor have exceptional circumstances been demonstrated.
- ask the GMCA to be bolder in terms of increasing investment focus onto sustainable transport modes and networks which will be essential to achieve other strategic aims - particularly making Greater Manchester net carbon neutral by 2038.

1) What type of respondent are you.

Manchester Friends of the Earth, a Greater Manchester-based environmental campaigning organisation working on a range of issues that includes sustainable transport, aviation and climate change

2) Contact details

Manchester Friends of the Earth, Green Fish Resource Centre, 46-50 Oldham Street, Manchester, M4 1LE. Email: office@manchesterfoe.org.uk

3) Are you over the age of 13?

Yes.

4) If you are submitting a response on behalf of an organisation or group, please give us their details.

See Q2 above.

5) Happy for the response to be published? Yes, please publish our response in full.

6) Do you agree that we need a plan for jobs and homes in Greater Manchester?

Yes, in line with National Planning Policy Framework, 2018 (NPPF 2018) Sections 5 and 6, Manchester Friends of the Earth agrees, but would suggest that a more balanced approach is needed.

8) Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities? (mostly agree).

Manchester Friends of the Earth (MFOE) supports the protection of greenspaces across Greater Manchester (GM), including but not limited to those valued by our communities. While there is a value in low biodiversity amenity grass present in much of these areas, it is much better if the recreational value provided by such spaces was quantified in the overall approach. Policies should aim to improve such spaces as suggested within the 'Natural Environment' Topic Paper (although current objective setting for major parks and greenspaces seems more limited compared to Uplands, Woodlands etc).

While many communities innately value green spaces in their area, they will not always know the true nature such spaces harbour (or other ecosystem function for that matter) or their potential to be better; so more precise objective setting would be advantageous to improve the ecological, recreational, well-being, air quality function of such spaces.

Manchester Friends of the Earth's vision is that Greater Manchester is a thriving, zero-carbon and zero-waste region, with happy, healthy, actively engaged, Carbon Literate citizens. People live in warm homes, with jobs and services nearby, and most of us choose to get around on foot, bicycle or the region's affordable, integrated public transport system. Greater Manchester is powered by renewable energy, much of which is generated locally and owned by local communities. Everyone has access to healthy air, food and water, and nature is flourishing, supporting our well-being and protecting us from the changing climate.

9) Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used? (mostly agree)

Protecting and enhancing existing green and open space should be seen as part of an overall spatial strategy where changes, including losses, deterioration in quality and improvements are mapped, registered and used to inform other strategies and actions such as on climate change mitigation, to improve indices of access to nature and open space, how built development needs to contribute to addressing deficits in open space provision and other aims.

Such an approach to protecting green space is more likely to be possible by focusing development on previously used land where infrastructure is already present and can be enhanced. In allocating 87% of housing and 95% of commercial development on brownfield land, the Greater Manchester Combined Authority has amended the GMSF approach to protect more greenfield and green belt land previously under threat (halving the uptake of Green belt take).

Whilst, this is a welcome step in the right direction, the policy should go further in this regard. We note that almost 50% of industrial and warehousing is proposed to be allocated on greenfield including within green belt locations. While we acknowledge that national policy seeks provision to be made at "*a variety of scales and at suitable, accessible locations*" (para 82) (encouraging accessibility to the strategic road network), **the scale of green belt release remains a concern.**

Out of town locations are likely to be less sustainable, causing an increase in road traffic because of more cars and lorries on our roads and fail to protect and enhance green spaces to the benefit of those living nearby and in the Greater Manchester Area, and for their wider environmental benefits, such as ecological.

The approach to strategic green belt release also encourages additional major road infrastructure. We would query whether the need for "accessible locations" for such uses

should inevitably mean road-based modes: existing rail and waterway networks can provide options to transport goods (notwithstanding the private ownership of the GM Ship Canal) and the plan should proactively encourage this.

10) Is the approach that we have outlined in the plan reasonable?

The revised approach addresses *some* of the principal concerns we raised in our response (January 2017),² although the extent of green belt release (despite a welcome 50% reduction) remains a major issue.

Manchester Friends of the Earth strongly support a “brownfield preference” policy, however further consideration needs to be given to ensuring mechanisms are identified to ensure the funding is in place or would be forthcoming to secure the land remediation and other measures, such as infrastructure needed in support this approach. We understand a HIF bid is underway which should help in this regard and also suggest that developers should be able to shoulder some of the remediation cost burden.

Aspirations to build at higher densities (not necessarily high density) and adopting a ‘compact city approach’ is key to further reducing pressure on the Green Belt. This approach is being proposed elsewhere such as in the London Plan Spatial Strategy (and NPPF), with a focus on development at or near to major interconnected transport hubs. National Friends of the Earth commissioned research by [Transport for Quality of Life](#) (Planning for less Car Use)³ which highlights how higher densities can also reduce car use and emissions, which is relevant in the Greater Manchester Spatial Framework approach.

Manchester Friends of the Earth supports strategic aims to protect “green infrastructure” but are unsure whether detail on net gain principles should be left for Local Plans, where conflicting approaches may arise. We would welcome more information on the metric to be used, whether or not this applies to all GMSF authorities, and more clarity on the Roadmap for next consultation.

Manchester Friends of the Earth welcomes the carbon-neutral aims put forward within the plan, as well as the range of measures to ensure these are met. However, we are concerned that the proposed approach would lead to new road building, a projected increase in car, road and air freight and plane journeys (by number), as well as loss of green belt which would conflict with and jeopardise prospects of meeting these aims.

We welcome a mix of affordable housing tenures and a focus on brownfield land. Annex 2 of the NPPF defines the various forms of affordable housing and we would ask that the policy expectation set out that priority be given to providing genuinely affordable homes to

those who are unable to buy or rent on the open market, with reference to the relationship between local incomes and house prices.

We would suggest any local (GMSF) definition, while abiding with Annex 2 criteria, could make reference to giving discounts of more than 20% below market rents/ sold prices. Annex 2 wording states “at least”. We suggest this provides scope for local circumstances, land values, etc to warrant strengthening these definitions.

We ask that consideration is also given to housing type and housing quality, including environmental performance/ energy/ water efficiency (et al) with a view to facilitating the provision of homes that are also affordable to run with minimal outgoings (for example, affordable to heat, natural ventilation, good levels of daylight, natural heating and cooling).

Mechanisms to secure types of infrastructure needed to achieve the above spatial approach should be set out more clearly how they will address competing aims. For example, the plan aims to provide strategic measures to relieve road congestion while also wanting to ensure more commuter daily trips are taken by public transport, walking or cycling (re Transport Topic Paper). We ask the GMCA to be bolder in terms of increasing investment focus onto sustainable transport modes and networks which will be essential to achieve other strategic aims - particularly making Greater Manchester net carbon neutral by 2038.

11) Any comments about the Context of the plan?

Manchester Friends of the Earth are concerned that Chapter 2 (Context) seems to set out an almost exclusively economic paradigm at the expense of acknowledging what is great about Greater Manchester, its cultural diversity, heritage, environment, achievements and people (and what they feel is important).

Manchester Friends of the Earth believes the expansion of Manchester Airport and proposed road building contradicts Greater Manchester’s ambition to be a carbon-neutral city-region by 2038.

Expansion of passenger and logistic aviation at Manchester Airport is incompatible with the Greater Manchester carbon budget because the science-based budget is predicated on zero growth in UK aviation and shipping emissions to 2030, then reducing them to zero by 2075.

We agree that climate change needs an urgent response so understand the pressing need to keep fossil fuels in the ground, but are concerned about the ability to deliver much needed net gain in biodiversity assets over the plan period and the production of a Clean

Air Plan in the context of building more roads and growing substantially the number of flights annually at Manchester Airport. The Greenhouse Gas (GHG) emissions and air pollution impacts from such additional air travel to and from Manchester Airport must be properly assessed, and mitigated.

Greater Manchester must get more freight and passengers on to rail, as conveying cargo and people on the motorway network is unsustainable. It contributes to GHG emissions and air pollution. Manchester Friends of the Earth campaigns for a modal shift from road and air to heavy and light rail and to active travel for short journeys, but is concerned that HS2 would cause a net environmental loss, particularly with key stations being proposed in Green Belt locations, and the landscape impact, noise and GHG emissions associated when running trains at very high speed.

Manchester Friends of the Earth is concerned that the assumption of continued economic growth, with an economy that is projected to be 59% bigger by 2038 (in the Accelerated Growth Scenario), presents serious problems for sustainability (and both local and global equity). Both the GM Forecasting model baseline and accelerated growth forecasts are well above the median of other economic forecasters, including the OBR.

A 2.5% annual GVA growth rate would cause additional greenhouse gas emissions even allowing for the projected growth to be less carbon intensive than the GM economy in 2015 (the baseline year) and that it declines either at the desired rate of the GM economy (carbon neutral by 2038) or at the legislated rate of the UK economy (20% of the carbon intensity of 1990 by 2050).

We would ask for a more holistic presentation of Greater Manchester (GM), as currently its cultural strengths (music, art and nightlife) are compacted into roughly 3-4 lines, while there is hardly a mention of its diverse ethnic and cultural make-up and wider environment. As a plan for the people of Greater Manchester, it should respond to a diverse range of interests, not just focus on economic growth.

NPPF para 15 states: “*Succinct and up-to-date plans should provide a positive vision for the future of each area, a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*” Para 20 states “*strategic policies should make provision for... community facilities (such as health, education and cultural infrastructure)*”.⁴

Further consideration needs to be given to section 2.32 entitled *Key challenges for the GMSF* for which two bullet points seems very thin for such an important topic. This section should summarise in a more meaningful way the key challenges. For example, it

could usefully reflect some of the challenges outlined in preceding paragraphs and also mention others, such as making GM carbon neutral by 2038.

We support the aim of achieving the “highest possible quality of life for all residents”.

Manchester Friends of the Earth would recommend a new section be added in this chapter to cover the wider environmental, social and cultural context of Greater Manchester. This would counterbalance the economic/employment/growth emphasis that dominates Chapter 2 as presently drafted. The accompanying topic papers and evidence base provide a much wider context on issues ranging from tree coverage, to cycle ways and European protected sites to district heat networks, as well as the interconnectedness (in landscape and recreational terms) of the Peak District and of uplands, lowlands and other landscape types.

GMSF Vision

We understand that the GMSF Vision is taken from the Greater Manchester Strategy which has already been agreed hence its exclusion from this consultation. We offer comments here in case an opportunity arises during the process of preparing the GMSF to modify this.

Manchester Friends of the Earth’s vision is that Greater Manchester is a thriving, zero-carbon and zero-waste region, with happy, healthy, actively engaged, Carbon Literate citizens. People live in warm homes, with jobs and services nearby, and most of us choose to get around on foot, bicycle or the region’s affordable, integrated public transport system. Greater Manchester is powered by renewable energy, much of which is generated locally and owned by local communities. Everyone has access to healthy air, food and water, and nature is flourishing, supporting our well-being and protecting us from the changing climate.

Key themes recognise Greater Manchester’s strengths in its diversity; ensuring it’s sustainably connected; remains equitable; protects its green spaces and breathable and supports zero carbon infrastructure going forward. Our vision is the backbone to our response and underlines many of the points we make in our response.

The GMSF vision needs to encourage the use of sustainable transport modes as sustainable transport cuts across many other key issues of improving health, well-being, air quality, access to employment - while tackling the 76% of trips made by car (see **Transport Topic Paper**),⁵ reducing inequalities (re “access to transport as a barrier to work”) and complimenting the ‘Streets for All’ approach.

Manchester Friends of the Earth supports the reference to GM being at “*the forefront of action on climate change with clean air and a nourished environment*” but would place it **before** reference to a “modern productive economy”, which infers the economic tenet of sustainable development over the environmental and social – instead of a balance.

While positive, the vision lacks reference to any local identity and *could* represent the aspirations of any city region (district, town or city) in the UK. More local distinctiveness could be added, with detail drawn from both the ‘Our People Our Place - Greater Manchester Strategy’.⁶

12) Do you agree with the Strategic Objectives:

12. 2) Create neighbourhoods of choice

Manchester Friends of the Earth welcomes a brownfield first approach, supported by NPPF para. 117.⁷ Such brownfield uptake must however show sensitivity to existing natural habitats that may be present on such sites, with replacement if lost.

Manchester Friends of the Earth supports more growth in the satellite town centres, especially locations near to public transport hubs that can encourage uptake of more trips by sustainable transport modes.

We would recommend that promoting and requiring climate resilient development, as well as carbon-neutral infrastructure (including housing) and insisting on high quality are matters the plan should highlight at this point, especially to ensure developers and housebuilders are held to account in an era of increasing prices and record profits that their products are the most efficient resilient they can be.

Specific reference should be for developments that will genuinely serve existing and new communities and enable them to flourish.

12.4) Maximise the potential from national and international assets (disagree)

Manchester Friends of the Earth opposes radical increases to airport passenger throughput (i.e. more plane journeys). Despite the Greater Manchester Transport Strategy 2040 advocating almost a doubling of passenger numbers,⁸ this approach would have to be aligned with the UK’s ability to meet current and future carbon budgets, be tested by the Committee on Climate Change and warrant possible consideration via an additional Airport NPS. The current approach cannot be justified (in terms of soundness) without taking these considerations fully into account.

Focus on the Core Growth Area and Manchester Airport for development should not be at the expense of inward investment to surrounding towns and other sustainable locations.

Manchester Friends of the Earth do support sustainable transport routes between satellite town and the Core Growth Area, although less so for unsustainable locations such as 'Airport City' and other "key economic locations" in the green belt if this is to enabling / justify further commercial, industrial (logistics) and freight-based investment at these locations.

We support the objective "Enhance our cultural, heritage and educational assets", but wonder if this could be expanded to include reference to natural heritage assets present within and around Greater Manchester.

12.6) Promote sustainable movement of people, goods and info.

Clarity is needed, especially how the overall existing transport system will be "enhanced". The **Transport Topic Paper** is clear that a reduction of car journeys to under 50% of all trips is needed to combat air pollution, health issues and relieve serious congestion.

While we would hope "enhancements" would mean new sustainable cycling/walking routes, the Transport Delivery Plan (2040) includes (within the next 5 years) "**new link roads to support growth, such as M58 and A49 link roads...**" and plans to justify the economic case for "**Manchester Airport expansion highway improvements**" in the next 5 years. (our emphasis).

While other sustainable transport priorities begin to be addressed also (such as the 'first tranche of Mayor's Challenge fund for walking and cycling'), Manchester Friends of the Earth questions supporting new road building/enhancements when the GMCA's own evidence states that "**road transport alone contributes 65% of emissions of nitrogen oxides and 79% of particulates**" (para 99 – Transport Topic Paper)⁹ and £400 million was earmarked for "**improving junctions and tackling bottlenecks.**"¹⁰

Manchester Friends of the Earth questions whether 800 meters is close enough to encourage meaningful uptake of sustainable transport modes (re distance of new development to sustainable transport hubs) by users of new developments, and whether this target distance should be reduced.

Manchester Friends of the Earth supports the objective for new development to "encourage/enable active and sustainable travel" but it will be important that local polices

are robust and justified and supported by evidence. Housebuilders and their planning consultants can easily play the viability card at Examination in Public, forcing the Inspector's hand and watering down requirements and so good evidence will be needed to make these aspirations mandatory.

While we would support increasing the amount of freight via existing sustainable transport modes (rivers and canals), we trust "*improved opportunities for sustainable freight*" does not justify the building of new logistics hubs and new motorway junctions (an approach we cannot support).

12. 7) Ensure Greater Manchester is a more resilient and carbon neutral city-region

Manchester Friends of the Earth fully supports and applauds the proposed approach to carbon neutrality of new development.

We strongly support the objective to promote sustainable patterns of development to minimise car travel/dependency and contribute to cleaner air. However, we note that this objective is undermined by the draft GMSF proposed approach to greenbelt release, supporting new relief roads and ribbon development alongside motorway corridors that would inevitably follow.

Manchester Friends of the Earth supports the provision of further infrastructure for cleaner vehicles but highlights that increasing electric vehicle uptake will not reduce congestion but will likely serve as a replacement for traditional car use. Transport for Greater Manchester report that "77% of all kilometres travelled by GM residents are done so by car (either as driver or passenger)".¹¹

National Friends of the Earth commissioned research from Transport for Quality of Life ('More than Electric Cars')¹² which suggests that an overall reduction in traffic by 20% (as well as electric car deployment) will be needed to ensure the UK can meet its binding carbon budget targets.

We support the call for improved energy efficiency, and generation of renewable and low carbon energy, but would ask more emphasis to encourage local councils to allocate/identify "suitable sites" (for onshore wind) and require renewable energy technologies to be incorporated into or provided alongside all new development, with the possible exception of very minor development, with a preference for on-site delivery.

12. 8) Improve the quality of our natural environment and access to green spaces

Manchester Friends of the Earth strongly supports this objective. However, we feel it omits crucial elements. The creation of new green space/infrastructure should be an important objective, given the context of the 'Greater Manchester Accessible Greenspace Analysis' (undertaken by Natural England and the OS) that identifies deficiencies in accessible natural greenspace in areas of multiple deprivation across GM and calls for "*more and better quality...and accessible greenspace*" while supporting the case for "*more greenspace and green infrastructure investment*" (see pg. 25 – *Natural Environment Topic Paper*).¹³

The 'City of Trees Initiative'¹⁴ is relevant here also, and while we acknowledge it's not possible for policies to contain all the relevant details, the key nature objective should reference enhanced tree provision across Greater Manchester – especially in terms of air quality, climate change mitigation, wellbeing and the biodiversity improvements meeting this objective would have.

Manchester Friends of the Earth supports further improving access to nature, while encouraging sustainable transport modes and noting the role such spaces have in addressing climate resilience and reducing flood risk.

13 - Do you agree with the Spatial Strategy

The Spatial Strategy chapter points to high levels of deprivation experienced across northern areas (except Bury). This would suggest the 'trickle-down'/redistribution effects resulting from major allocations/ investment in Central Manchester aren't working. Policies GM-1 and 2 however continue to focus major allocations into the "Core Growth Area" and "City Centre", proposing over 50,000 dwellings and 1,500,000m² of office space for the latter alone.

Manchester Friends of the Earth believes that in light of the recognised economic disparities across GM it would be preferable to ensure that a broader range of towns and district centres within Greater Manchester benefit from major office allocations with the potential for providing more local employment opportunities (and at cheaper rates than in Central Manchester)

The spatial strategy diagram, while displaying areas of development focus, should differentiate between the levels of anticipated growth/development for each policy (e.g. so comparison between say Strategy 2 and Strategy 6 are possible).

Spatial Policies

17) Do you agree with the proposed policy on Port Salford? (Mostly agree)

Manchester Friends of the Earth are concerned that as the Green Belt provides an important 'green lung' function at this location and that additional road based haulage in an area that already has poor air quality and noise performance is not sustainable.

We are concerned that the Port users may in reality not rely equally on road, water and rail based modes of transport. We would like to see GMCA provide some policy support for equal shares of water and rail based transport, and limit the volume of HGV movements. We are concerned that the capacity of the environment is at its limit, and the impact on the health and well-being of nearby residents. It should only be encouraged for genuine Port and Manchester Ship Canal related development.

We are supportive of a potential new station here to enable more sustainable travel to the area.

18) - Policy GM – Strat 5 Inner Areas

While Manchester Friends of the Earth supports proposals for improvements to green infrastructure within these areas, our response to Strategy Objective 8 highlights the need for provision of new green infrastructure, including open spaces in addition to enhancing what exists already.

Further improvements and possible new allocations do seem to be required in these areas to improve upon the ANGST scores within the evidence base and make sure everyone has access to a range, size and quality of green space (and gain from better air quality, health, well-being and other benefits).

The "high levels" of new development proposed in Strategy 5 should be better quantified, especially as policies covering the Quays and Central Manchester provide such figures (e.g. housing/office).

We assume that in wanting to enable "new people" to move into these areas while retaining existing community identity, the GMCA recognise the risks of gentrification and redevelopment to existing communities. We trust both this approach and subsequent local plan policies consider the consequences in detail. For example, it will be important to ensure sufficient provision of affordable and family housing is made and that existing communities directly benefit and are not disadvantaged from the consequences of new development in these areas.

19) - Policy GM-Strategy 6 – Northern Area (mostly disagree)

While Manchester Friends of the Earth supports the idea of focusing on the Northern Area, the Strategy maintains a narrow focus re ‘enhancing competitiveness’ and uses this to justify major greenbelt release along the principal motorway network – which is highly unsustainable.

Manchester Friends of the Earth questions whether the M62 North East and Wigan-Bolton growth corridors are really the answer and whether any alternative approaches were considered to rebalancing the northern areas with the central and southern areas. While the NPPF suggests “accessible locations” and “flexibility of choice” for new industrial development, substantial new road infrastructure to accommodate such development within the green belt are not welcome.

We fear that this and subsequent policies inferring such a quantum of green belt release will unlikely meet the exceptional circumstances tests and that other options should be considered, such as increased densities/locations in existing areas, or a reconsideration of the methodology used within the Employment Land Review Analysis Note. The methodology used to calculate current and future needs relies primarily on ‘past employment land take-up’ as the preferred approach to assessing future needs for Office, Industry and Warehousing space.

The report states: *“Employment forecasting based approaches are generally not used, for the simple reason that such models tend to suggest low or even negative (net) need for employment land which is out of kilter with what is actually manifest as need.”* (para 3.58).¹⁵

We would however ask the GMCA to reconsider whether “past take-up” modelling is the most effective means of working out employment land supply 10, 15 or 20 years down the line, especially when the employment market is undergoing such change. With people increasingly working from home, a rise in the use of serviced offices (to enable traditionally large businesses to minimise costs and floor space), demand for live-work units and the decline in UK manufacturing output we question how this forecasting methodology (primarily based on demand for traditional B1, B2, B8 uses) can be used to justify such large green belt release.

The **Employment Topic Paper** seems to identify some deficiencies with the past take-up model, with para 6.23 stating: *“By using past development rates since 2004, there is however an expectation that these relationships broadly will to continue to hold in the future”*.¹⁶ We would ask if such expectations have factored in a possible “No-Deal” Brexit

scenario into these *projections*, especially any potential for possible reductions in investor confidence.

The rise of large-scale warehousing sheds and mass logistics operations (to facilitate internet shopping habits) together with a 20% buffer (to allow for provision in more suitable locations) may be having an inflationary effect on actual employment land supply needs for Greater Manchester, jeopardising parts of the green belt in the name of “enhancing competitiveness”.

Manchester Friends of the Earth would recommend that the Greater Manchester Combined Authority commission either an employment forecasting model or a more scrupulous evaluation of existing existing/underused employment sites to see if there are viable alternatives to this proposed approach. Such a review of all of GM’s employment stock in a new report, rather than having to use employment land reviews figures from individual authorities would also rule out different approaches to scoring existing sites, and could provide a different slant on the suitability, deliverability and accessibility of the existing employment land supply.

20) - Policy GM-Strategy 7 – M62 NE Corridor / 21 - Policy GM Strategy 8 – Wigan-Bolton G.Corridor (disagree)

Significant ribbon housing and employment development along the M62 seems unsustainable and will encourage the need for substantial additional road-based vehicle movements. Such an approach directly conflicts with the environmental and health findings of the **Transport Topic Paper**, including: contributions made by road transport to NO2 and particulate matter (para 99) and that motorways have the highest levels of noise “*although*” (as the document states) “*the M62 and M60 are unlikely to be in the vicinity of residential areas*” (para 101).¹⁷ This growth option puts new housing allocations near to these noisy, polluted corridors.

The area is devoid of public transport and the location is inaccessible. Although public transport is noted as needed this should be provided upfront to ensure travel patterns are as sustainable as possible. Quality bus transit between Rochdale and Oldham would be welcomed.

Manchester Friends of the Earth is concerned that development here will simply fuel unsustainable patterns of growth and will be entirely road based. This is highlighted by the fact that funding is already committed to the capacity of Simister Island (junction of M62, M60 and M66), due to gridlock as a result of the induced traffic at this location. Further

development in the vicinity would cause inevitable problems from a concentration of more road based traffic, much of it HGV causing yet more environmental harm and congestion on Europe's busiest stretch of motorway. Manchester Friends of the Earth is not convinced this represents sustainable development.

Manchester Friends of the Earth questions whether residential development in such areas will ensure requirements for new development to be within 800m of a sustainable transport hub (as per Strategic Objective 6). We have also suggested this distance should be reduced.

Manchester Friends of the Earth does not consider proposed delivery of over 2,000,000m² of new employment floorspace and 25,000 homes justifies Green Belt loss on this scale. Employment land review figures show existing and underutilised employment sites exist across the GMCA area and greater priority should be given to these and through enhancing and intensifying existing provision. As noted above, the Employment Topic Paper states that the 5,064,000m² of new employment floorspace includes a 20% "flexibility of choice requirement" – or over 1,012800 m² of land – regardless of the extent of existing/underused sites across Greater Manchester.

The NPPF states at para 137 "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development".¹⁸

With the brownfield first approach endorsed by the GMCA, availability of other sites, and doubts to the methodology used to estimate supply, we consider green belt release is unnecessary. While the NPPF advocates flexibility of choice we consider this can be achieved through enhancing existing underutilised, empty and vacant sites across Greater Manchester.

Manchester Friends of the Earth reiterates the Greenbelt Topic Paper which suggests the 'Green Belt Assessment' from the 2016 consultation was not a Green Belt Review, which would be required to release such large amounts of GB. Are there plans for such a review to be undertaken?

With the establishment of the Greater Manchester Green belt only in the 1980s, Manchester Friends of the Earth feel the timing of such a quantum of Green Belt release is unprecedented and unjustified; **contrary to the five purposes and in direct conflict with the permanence argument set out in the NPPF.**

**21) Do you agree with the proposed policy on the Wigan-Bolton Growth Corridor?
(Mostly disagree)**

There has been substantial speculative development of B8 warehousing already now sprawling along in ribbons along the M6, M61, and M62 corridors, with substantial harm to Green Belt purpose, which is a nationally significant planning policy designation.

We do not believe that there has been genuine consideration of the cumulative harm. There has been inadequate “duty to cooperate” between neighbouring authorities and an absenteeism in the Secretary of State role, refusing to call in controversial decisions on the grounds of localism, such as at Florida Farm, St Helens.

23) Policy GM-Strat-10 – Manchester Airport (disagree)

Manchester Friends of the Earth questions whether the environmental impacts of increasing passenger throughput and freight handling to such an extent (re 28-55 million a year) would be compatible with UK Carbon Budget and CCC recommendations, especially in the context of Heathrow, where a third runway has the potential to exceed requirements.

In a letter to current Transport Secretary (Chris Grayling) (after he gave the government’s position on airport policy), the chair and deputy chair of the Committee on Climate Change (CCC) wrote that *“Aviation emissions at 2005 levels in 2050 means other sectors must reduce emissions by more than 80%, and in many cases will likely need to reach zero. Higher levels of aviation emissions in 2050 must not be planned for, since this would place an unreasonably large burden on other sectors.”* (CCC/June 18).¹⁹

While ‘Airport City’ is wanted by the GMCA to raise the international profile of the city-region and make it *“Britain’s second Global City”*, the spatial approach does little to rebalance the historical investment focus away from southern and central areas, and as such is at conflict with Policy GM-Strategy 6.

Manchester Friends of the Earth would also query how 500,000m² of new office, logistics, hotel and manufacturing space and 2,400 residential units at this location would strategic objective to reduce daily car-based commuter trips below 50% across GM (see Our Vision for 2040 – the Right Mix – para 73 of **Transport Topic Paper**).

With the **Transport Topic Paper** suggesting day trippers and visitors to Manchester are already more likely to use car-based modes than any other (para 87), and with only 13% of journeys made by public transport across Greater Manchester per year, how can the

GMCA guarantee that additional metro and rapid bus links to service 'Airport City' will be used ahead of more damaging private or rented car modes? Particularly with reports that the Greater Manchester councils are seeking to build another car park at the airport with a capacity of 7500 cars.²⁰

Evidence suggests (para 99) that further unacceptable air quality impacts from car journeys would likely result, in addition to the increased aviation impacts – which would fail the soundness tests of the NPPF (re see paras 25²¹, 103²² and 181²³).

25) Policy GM-Strat 12 Main Town Centres (mostly agree)

Manchester Friends of the Earth supports the policy aims to redress some of the investment imbalances between Northern, Central and Southern parts of Greater Manchester, but note that this policy proposes a business as usual approach by focusing on retail.

While retail forms part of the economic driver of main town centres, such centres haven't always historically been dominated by it, instead being part of a wider offering. However, with a presumably greater reliance on the retail employment sector in many of these towns compared to Central Manchester (and with 1 in 12 shops having closed across the UK in the last 5 years²⁴), some very innovative policy thinking is needed, in addition to traditional forms of "place-making". Such approaches will require focused and ongoing dialogues with local residents re spatial and non-spatial intervention options; jointed up funding delivery and access to major government funding (much more than the High Street Innovation Fund), but would need to be framed in acknowledgement of the disruptive nature of internet shopping will continue to have on the function and appearance of our traditional high-streets and town centres.

Manchester Friends of the Earth supports additional residential units in the main town centres, which *may help* assist in the uptake of day-to-day food convenience, as well as more unique boutique services and restaurants offering that can't be bought off the internet.

While the policy approach is perhaps compliant in terms of NPPF soundness tests, we fear the 'same old' policy approach may prove ineffectual considering ongoing structural changes to the UK retail market. Further consideration needs to be given to identifying viable policy/intervention alternatives, which we appreciate there are no easy to deliver.

26) Policy GM-Strat 13 Strategic Green Infrastructure (mostly agree)

Manchester Friends of the Earth welcomes the intention to protect and enhance these valuable assets and assume the approach will be in line with the issues and objectives raised in the **Natural Environment Topic Paper**.²⁵

Any Strategic Green Infrastructure must be more than 'just' a collection of green spaces; and the GMSF's approach must enable decisions to be made about how well the network of green infrastructure is functioning (such as in terms of access to nature, supporting health aims, assisting flood risk, urban heating and cooling, carbon sequestration and other multi-functions), how much more is needed as new development takes place and, of course, how well the network is supporting the restoration of nature, habitats and species.

As such, a Strategic Green Infrastructure strategy performs a more dynamic role than by just having an open spaces strategy.

27) Policy GM-Strat 14 A Sustainable & Integrated Transport Network (mostly agree)

Manchester Friends of the Earth supports aims to improve the transport network to ensure half of all daily trips are made by public and sustainable transport modes, but question whether the target of should be higher than 50%?

The policy should tie into the benefits such behavioural change would have on improving access to open space via green corridors, as well as the health, well-being and air pollution benefit for its population.

In terms of the GMCA's plans to reform the bus market, Manchester Friends of the Earth supports free bus travel for under 30s, and we feel scope exists across GM to explore this option going forward. The benefits of greater public transport uptake to the environment, air quality, congestion & social mobility all justify this approach alongside other measures to reduce car-based trips.²⁶

Manchester Friends of the Earth also supports higher growth densities around transport hubs (to a certain point), although not at expense of impacts to living conditions or any tangible loss of green space. The case for each area would require detailed thought in terms of acceptable space standards.

Greater Manchester's future sustainable and integrated transport network should be discussed in more detail, at least within the justification section. More details in the first paragraph, which discusses walking and cycling, would be beneficial.

Highlighting the wider benefits of the sustainable and integrated transport network (especially walking and cycling) relating to greenhouse gas reduction, the environment and health should be explored, in line with recommendations of the Integrated Assessment (Enhancement and Recommendation of Draft Transport Connectivity Policies 2018).

While Section 6 of the **Transport Topic Paper** recommends improvements to the wider transport offering, as the strategic sustainable policy more effort is needed to draw out and promote the huge environmental benefits such a system would bring about. Reference to current strategic transport proposals and funding tranches that have already been agreed (e.g. Bee Network and Mayor's Challenge Fund for walking and cycling) should be included to show such policy is not just aspirational.

Sustainable Greater Manchester

28) Policy GM-S 1 Sustainable Development (mostly agree)

Manchester Friends of the Earth supports the preference being given to brownfield/PDL areas for new development, especially where the approach will be sensitive to areas of biodiversity that may have emerged. We acknowledge however that such an approach may require major remediation funding from government to ensure the "deliverability" of GMCA's housing land supply is not put at risk.

Manchester Friends of the Earth supports the idea of "simultaneously" maximising economic, social and environmental benefits and minimisation of adverse impacts, but **do not** support net gains in an environmental context.

Friends of the Earth's position on net gain with respect to nature is clear with concerns over the metric being proposed; the overall trajectory of current discourse; the lack of a proximity requirement to a development site for such proposals and scepticism that developers may ultimately find themselves more able to exploit more sensitive and desirable sites without having regard to preserving sensitive assets that traditionally would have been a reason to refuse permission.²⁷

29) Policy GM-S 2 Carbon and Energy (mostly agree)

Manchester Friends of the Earth strongly supports the policy aim for Greater Manchester to be carbon neutral by 2038. NPPF paragraph 148²⁸ (Chapter 14) is clear that the planning system should support the transition to a low carbon future in a changing climate.

We would however query whether *some* of the strategic policies (including Policy GM-Strat 7 – M62 NE Corridor and Policy GM Strat 8 – Wigan-Bolton Growth Corridor) are not in conflict, especially in terms of key measures such as "*securing a sustainable pattern of*

development". The locations chosen for many of these strategic allocations are unsustainable, aside from being located adjacent motorway networks (re "accessible" in NPPF terms) and will encourage car-based trips despite best intentions.

We support the remaining aims, especially "keeping fossil fuels in the ground", and the presumption against hydraulic fracturing that results, as shale gas is not the answer to our energy needs.

In January 2018, the UK Government announced proposals to "put into effect an end to unabated coal generation by 2025".²⁹ Manchester Friends of the Earth believes that we need to end the use of coal earlier than 2025. We note that some of the GMSF site allocations still contain the following policy that states:

"Development at this site will be required to: Ensure the extraction of any viable sandstone, surface coal and/or brickclay resources in advance of construction, in accordance with the relevant policies of the Greater Manchester Joint Minerals Plan."
[See Policy GM Allocation 4 - Bewshill Farm, Policy GM Allocation 5 - Chequerbent North and Policy GM Allocation 6 - West of Wingates / M61 Junction 6].

The GMSF therefore fails to be compliant with national policy on coal phase out and Manchester Friends of the Earth believe that the Greater Manchester Joint Minerals Plan needs to be reviewed to reflect the need to prevent the exploration for and the extraction of fossil fuels such as coal and unconventional fossil fuels such as shale gas and coal bed methane.

We trust the Mayor will use his influence to instigate a Joint Minerals Plan Review and would also draw the GMCA's attention to the recent 'Talk Fracking' High Court Judgement. The judgement allows plan-making and decision-making authorities to reconsider the impacts of fracking on climate change; rather than just rely on the current wording of the NPPF.

Para 71 of the judgement states: "...in the context of individual decisions by plan makers or decision takers it would be open to depart from the in principle support for fracking provided by paragraph 209(a) on the basis of the requirement, for instance in paragraphs 148 and 149 of the Framework in particular, for the planning system to take decisions which support reductions in greenhouse gas emissions and plan proactively for climate change".³⁰ We trust this will assist you in justifying your approach to the current draft policy stance and would aim to ensure the minerals plan provides additional consistency with this policy.

We support the GMCAs approach to the retrofitting of the housing stock, as well as the expectation that the energy hierarchy (as taken from CfSH guidance) is the adopted approach for developers. More detail on the implications of this would be useful.

We note that in February 2019, the Committee on Climate Change recommended that all “new homes should be built to be low-carbon, energy and water efficient, and climate resilient. The costs of building to tight specifications are not prohibitive, and getting the design right from the outset is far cheaper than retrofitting later. From 2025 at the latest, no new homes should be connected to the gas grid. They should be heated using low-carbon energy sources, have ultra-high levels of energy efficiency alongside appropriate ventilation, and be timber-framed where possible”³¹.

Manchester Friends of the Earth wholly supports new developments being zero net carbon but asks whether too much time is being given for developers to meet the GM 2038 carbon-neutral deadline - the compliance date should be brought forward to 2021.

We also support the encouragement of renewable energy generation and would ask the Plan to encourage its member councils to identify “*suitable allocations for onshore wind*” (as per NPPF), to enable new onshore wind schemes to come forward. While outside the GM area, Calderdale Council is leading the way in terms of providing such allocations and a sound policy approach.

We would encourage renewable energy generation technologies for all new developments, where feasible, especially consideration of rooftop solar arrays as standard for all new commercial, residential and employment sites. Reductions in the price of such technologies

Finally, we support the inclusion of point 6, however would ask the policy justification is more explicit of the CCC’s advice that tree planting is critical to the UK meeting its carbon budgets³² (see our comments for GM S6), and that policy echoes this:

Proposed Change: “3. Take a positive approach to renewable and low carbon energy schemes; **[INSERT] including making solar arrays compulsory to all existing and new commercial, industrial and residential development across GM from 2020**”

30) Do you agree with the proposed policy on Heat and Energy Networks? (Agree)

Heat and Energy Networks have been identified as having potential to increase efficiency and therefore we would support having a strategic policy to promote such networks in suitable locations across greater Manchester.

31) Policy GM-S 4 Resilience (agree)

Manchester Friends of the Earth supports the current policy approach including measures that provide for climate change mitigation and adaptation. Sc19(1A) of the Planning and Compulsory Purchase Act (via the Planning Act 2008) states *‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change’*. The approach seems to support the duty in various ways (including an effective ban on fracking) and we support the approach taken by the policy.

Manchester Friends of the Earth supports the delivery of 50,000 affordable homes over the period and trust a suitable local definition can be adopted that meets the disparate financial situations and requirements of people in housing need across GM.

While increasing the size, quality and inter-connectedness of green infrastructure is very welcome, is this the best policy to set out such welcome principles, or would reference to increases in size, spread, quality and interconnectedness of the green infrastructure network be better emphasised in Policy GM-Strat 13 Strategic Green Infrastructure – especially as this currently only references “protection and enhancement”.

32) Policy GM-S 5 Flood Risk and the Water Environment (mostly agree)

Manchester Friends of the Earth supports the approach to SUDs, rejuvenating river quality, sensibly placed developments and increasing flood resilience (as well as other measures).

33) Policy GM-S 6 Clean Air (disagree)

Whilst, Manchester Friends of the Earth supports the various measures there is a clear need for greater clarity in the overall approach, as strategic policies advocating green belt growth adjacent the M62 and at ‘Airport City’ are principally reliant on increasing uptake of transport modes that generate significant air pollution (e.g. air travel and cars). These would be at odds with the aims of this policy including: **“Locating and designing development, and focusing transport investment, to reduce reliance on forms of transport that generate air pollution”** and **“Development should be located in areas that maximise the use of sustainable travel modes”**.

The GMSF policy is significantly weaker than Policy SI1 that the Greater London Authority is currently consulting on, which calls for major developments to be air quality neutral, for

all developments to avoid a further deterioration in existing air quality, and to avoid creating any new areas that exceed air quality limits.

In contrast the GMSF policy is at best a weak list of mitigation measures and in particular seems to allow polluting development provided that the pollution is monitored – see point 3 in the policy.

Manchester Friends of the Earth recommends that the policy is significantly strengthened and would suggest that as well as requiring applications that have an “adverse impact” on air quality to provide data and monitoring, that they should provide suitable mitigation, especially when cited in AQMAs.

Such requirements would also have the additional beneficial outcome of forcing the GMCA to look again at some of its Green Belt allocations. Many of these are likely to be car or lorry dependent and so will lead to worsening air quality.

Manchester Friends of the Earth supports measures to seek improvements to air quality around schools, but further detail would be beneficial.

Actions that promote removal of pollutants/CO₂ should include ideas such as mass tree planting, a campaign aim that we are endorsing nationally going forward. The protection and enhancement of the Strategic Green Infrastructure network would be relevant here also.

Manchester Friends of the Earth suggests specific reference to tree planting is included as a specific point, based on the benefits highlighted by the CCC to reduce CO₂ levels and meet future Carbon budgets going forward. Tree planting “*must*” double by 2020, and so reference to the importance of this strategy (as well as Greater Manchester’s own tree planting initiative – see **Environment Topic Paper**) either within this or within GM-S-2 would be beneficial. These changes make the policy justified (re “based on sound evidence”).

35) Do you have any further comments on the policies and overall approach proposed in Sustainable & Resilient Greater Manchester?

Manchester Friends of the Earth acknowledges the policy approach in GM-S 6 to clean air as part of a wider range of strategies and plans to cut air pollution. Fundamentally, a major reduction in car and road-based transport will be key in meeting these aims and acknowledgement of this is needed within this and other policies.

However, we also note that the draft GM Clean Air Plan indicates that Greater Manchester does not expect to achieve legally compliant air pollution levels before 2024. This does not meet the legal requirements places on the Secretary of State for compliance by 2021. Manchester Friends of the Earth will be seeking clarification from the Government whether the Secretary of State can legally accept the proposed GM Clean Air Plan.

Manchester Friends of the Earth endorses the approach taken to carbon neutrality, but consider solar energy arrays could play a bigger part in contribution of low carbon energy; while using otherwise redundant space on top of offices, blocks of flats etc

Prosperous Greater Manchester

Homes for Greater Manchester

43) Do you agree with the proposed policy on the Type, Size and Design of New Housing?

In terms of new building developments, Manchester Friends of the Earth believes that to achieve truly zero carbon emissions, the region will need to move away from using fossil fuels for heating entirely and the region's buildings will need to be powered by clean electricity from zero carbon sources.

Greater Manchester needs to introduce a codified zero-carbon building design standard.

Manchester Friends of the Earth wholly supports new developments being zero net carbon from 2028 but asks whether too much time is being given for developers to meet the GM 2038 carbon-neutral deadline - the 2028 date should be brought forward.

Manchester Friends of the Earth recommends that the GM Spatial Framework should also encourage the introduction of car-free developments.

We also note some areas already well-endowed with high density flat development (such as the Quays) could see further growth. Is such a housing model sustainable going forward given the need to provide alternative sizes and types of accommodation for all residents? (e.g. family and older persons accommodation). A sustainable approach is one that would seek the development of mixed tenure, inclusive communities which cater for households of different sizes, ages and backgrounds.

A Greener Greater Manchester

46) Policy GM-G 1 Valuing Important Landscapes (agree)

Manchester Friends of the Earth supports the draft approach and finds it consistent with the aims of the NPPF. We feel however that landscape preservation and acknowledgment of the contribution landscape makes to Greater Manchester (as well as its constraints) could be better emphasised throughout the plan, but especially in terms of context setting and strategic policies.

47) Policy GM-G 2 Green Infrastructure Network (mostly agree)

Manchester Friends of the Earth supports the draft policy approach to protect and enhance the existing Green Infrastructure Network, including measures to improve connectivity by providing green travel routes.

A priority for the Green Infrastructure Network (GIN) should be to look at deficiencies in the quality of biodiversity and access to nature and green, open space – as the evidence base (**Environment Topic Paper**) suggests has started (i.e. ANGST scoring). Natural England's Access Index is also a good guide and local plan polices should ensure deficiencies are addressed to parts of the GIN within their control.

We would suggest specific reference to tree planting is included as a specific point, based on the benefits highlighted by the Committee on Climate Change for reducing CO₂ levels and helping the UK meet current and future Carbon Budgets going forward. The CCC state that tree planting *“must”* double by 2020, and so reference to the importance of this as a strategy (as well as Greater Manchester's own tree planting initiatives) either within this or the strategic policies would be advantageous. Such inclusion would mean the policy is justified linked to the tests of soundness (re based on sound evidence).

The GMSF should also focus on 'bringing the countryside into the city'. We recommend reference to hedgerows, as opposed to hedges, and importantly to the Hedgerow Regulations 1997³³ as this offers statutory protection in recognition of the importance to local archaeology and history, and wildlife and landscape.

48) Policy GM-G 3 River Valleys and Waterways (mostly agree)

Manchester Friends of the Earth supports the policy approach, including improving water quality (Water Framework Directive and EU Natural Course project).

The policy also seems Brexit-proof, with positive aims building upon the legacy of EU Directives and projects.

Manchester Friends of the Earth supports the aims of re-naturalising rivers and watercourses (as well as improving quality), as part of new development taking place and measures under the Green (and Blue) Infrastructure Network Strategy - such as improving public access, boosting biodiversity plans. Essentially, the overall approach needs to avoid waterways being simply regarded merely as waterfronts for new development (as is suggested by point 9 in the policy).

We also support the opening-up of sustainable transport access alongside canals and suggest this be made a requirement to consider where opportunities arise in conjunction with the development process.

49) Policy GM-G 4 Lowland Wetlands & Mosslands

Manchester Friends of the Earth supports the draft approach as parts of the Lowlands are important carbon sinks, key locations for nature and needed for water retention (re flood alleviation).

However we are concerned at the reference in 8.27 to some sections of undeveloped mossland being considered appropriate for future development and we object to this. This text should be deleted to best protect this rare and threatened habitat.

50) Policy GM-G 5 Uplands (mostly agree)

Manchester Friends of the Earth supports the approach, especially extending areas of blanket peat bog, which assists in carbon sequestration; natural tree planting and improving its role in water storage, flood risk management etc.

The upland areas are also quite heavily populated by national and European designations (the latter – at least for now - affording their own EU protection), but some further recognition of the sensitivity of such features to change is essential, especially in the event of a post-EU Britain, and possible safeguards.

51) Policy GM-G 6 Urban Green Space (mostly agree)

Manchester Friends of the Earth believe the protection of urban green space is essential; especially as a haven for GM's population from pollution; as spaces of convalescence, in providing health benefits (and other objectives linked to Policy GM-G 2 above)

The phrase “*existing urban green space protected and enhanced in balance with other considerations*” perhaps though suggests an economically justifiable reason might outweigh such protections. what types of consideration are relevant?

Any assessment of whether existing place provision would be outweighed by other considerations needs to start with a proper assessment of existing UGS and its potential to be better in nature and other terms (i.e. not simply suggesting that existing space is of low value and can therefore be lost).

Manchester Friends of the Earth would suggest a rewording of the policy to be specific (defining other considerations) or at least refer to the ability of Local Plans to formulate more detailed considerations.

We support the creation of new Urban Green Space. We agree that densely developed urban areas need ‘quality’ accessible green space, and agree brownfield land should be reused for urban green space where deficiencies exist. Importantly, once a previously developed site has a value for green space, it should cease to be recorded as brownfield and should be given policy protection as an Urban Green Space.

52) Policy GM-G 7 Trees and Woodland (mostly agree)

Manchester Friends of the Earth supports this policy as it’s in line with our newest campaign objectives (see detail on policy GM-G2 for further information).

We presume NPPF principles for the protection of ancient woodland are relevant here and would perhaps warrant inclusion.

54) Policy GM-G 9 Standards for a Greener Greater Manchester (mostly agree)

The approach includes some net-gain principles that are incompatible (re offsite provision) with Friends of the Earth policy.

Friends of the Earth’s position on net gain with respect to nature is clear with concerns over the metric being proposed; the overall trajectory of current discourse; the lack of a proximity requirement to a development site for such proposals and scepticism that developers may ultimately find themselves more able to exploit more sensitive and desirable sites without having regard to preserving sensitive assets that traditionally would have been a reason to refuse permission.³⁴

The ANGST standards for ensuring balanced access to all sizes and types of natural green space across GM is admirable and should enable a more strategic overview of deficiencies and action points. Preliminary ANGST findings within the **Environment Topic Paper** suggest some interesting results, and we support the approach to assess the quality as well as extent and proximity to Green space for different communities across GM.

Manchester Friends of the Earth also support the need to better link these spaces up, as well as address deficiencies.

The Greater Manchester “Green Factor” sounds like it will set a realistic baseline for minimum green space provision, which we are likely to support, however a lack of detail on the matrix to be used at this point is disappointing and it would have been better to comment on the detail sooner than at more formative stages of the Plan.

55) Policy GM-G 10 A Net Enhancement of Biodiversity and Geodiversity

Manchester Friends of the Earth supports parts of the strategy for enabling nature recovery and the designation of the NIA (Nature Improvement Area)

However, we do not support the use of the DEFRA metric (2012) for calculating net gains at present, as we feel it is still too vague and reliant on lots of elements working together (which cannot be guaranteed to do so). It’s also operating outside of a coherent, comprehensive national strategy for the recovery of nature and ecosystems, therefore it cannot be assessed to be working in anything other than a superficial way.

We support the mitigation hierarchy that would be in place, but the policy also suggests that if no local habitat enhancement is possibly next to a development site or off-site, that regard should be had to “*supporting strategic biodiversity priorities initiatives including improvement to the green infrastructure opportunity areas under the GM’s Green Infrastructure Network*”. While we support improvements (as in Policy GM-G 2), allowing site specific biodiversity funding to be apportioned into a pot for wider redistribution might be suggested a risky approach, despite NPPF support for such a strategy.

Friends of the Earth would have liked to have commented on the local matrix being formulated by Natural England (i.e. “Biodiversity Net Gain Policy Guidance for Greater Manchester”) and so cannot agree to the policy’s wider aims without knowing the underlying implications of this. Friends of the Earth are hesitant about the adoption of such an important model for net gain as an Supplementary Planning Document and would prefer its adoption following Examination in Public subject to soundness tests (which would also increase its weight in terms of compliance in decision making).

We also note the 'Greater Manchester Net Gain Road Map' has "informed" the draft policies but are unclear as to the direction of travel without the document being available. We cannot fully endorse/ object without knowing full implications.

Manchester Friends of the Earth objects to the proposed substantial losses of some of the Best and Most Versatile Agricultural Land (possibly including deep peaty soils) due to overall scale of development "needed" within the plan. The quantum of development being required is seen as justification for such an approach (re major green belt release), which we object to and consideration of valid alternatives must be provided, including revision of evidence base methodologies. **The current approach is not NPPF compliant (para 177).**³⁵

56) Policy GM – G 11 Greater Manchester Green Belt

Manchester Friends of the Earth does not support the removal of such strategic tracts of land from the Green Belt (see above for relevant policies).

Policy terms "*positive and beneficial use of the Green Belt*" and "*providing high quality green spaces that will support economic growth*" are not within the NPPF, and we ask for more detail to what is actually meant.

Manchester Friends of the Earth asks for inclusion of the terms of the exceptions test in more detail, especially to enable lay readers to consider whether current plans for strategic removal of land from the Green Belt are justified.

We also ask for further detail on what would constitute 'inappropriate development in the Green Belt to make the policy sound.

Manchester Friends of the Earth supports the inclusion of wording on the permanence of the Green Belt, as well as proposals for enhancement of its green infrastructure function (including habitat restoration).

We also support the inclusion of 69 Green Belt additions that are identified in the revised Greater Manchester Spatial Strategy.

A Greater Manchester for Everyone

58) Policy GM-E 1 Sustainable Places (mostly agree)

Manchester Friends of the Earth supports the justification and reasoning behind the policy, which aims to address multiple factors to ensure places are delivered in a sustainable way, drawing on excellent building/urban design, ensuring resilience to crime; climate change; promote well-being; offering longevity; functionality and contribute reductions in waste and pollution.

Maintaining strong communities, local identity, with good integration of space and place are key to successful urban areas. New developments should not be allowed to dominate urban form or propose unsuitable uses that will erode social cohesion or be clone designs erected in other town centres. The vibrancy of Greater Manchester is one of its greatest strengths, and Manchester Friends of the Earth supports the approach to ensure new development will seek to retain this key element.

The challenge will be to deliver such design aspirations while the overall spatial approach calls for higher densities in the Core Growth Areas, where delivery is expected on large tracts of PDL - where upfront costs may already be prohibitive. Manchester Friends of the Earth has previously mentioned its concerns that without government funding for remediation, many of these key sustainability aims could be heavily watered-down in the name of developer viability and profit-margins. A general update of some of the key proposed funding options would be useful in the next iteration of the plan to ensure this approach can be justified.

62) GM-E-5 Health (mostly agree)

Manchester Friends of the Earth supports the policy approach, especially as health moves up the national policy agenda as its importance to the functionality and perception of successful places and communities are realised.

However, the draft policy does not go far enough, and while supporting healthy lifestyles, the policy fails to tackle some of the key contributory factors contributing to physical inactivity, obesity and ill-health, such as excessive car usage. The **Transport Topic Paper** details how car use is detrimental to many of the plans overarching policy aims.

While proposing a reduction in daily car trips to under 50% (of GM's daily total) is a start, the plan should also embrace principles of NPPF para 122, to reduce dependency on this mode of transport.³⁶

Furthermore - and as mentioned above – the policy could also look at local car parking standards for residential and employment uses, two of the biggest uses in encouraging car uptake. As a spatial strategy, more spatial levers should also be considered.

Overall, Manchester Friends of the Earth realises the policy's reliance on a wider set of levers and support the general aims of improving health provision and encourage well-being, but ask that it addresses more specific causes and suggests more innovative solutions.

Suggested Change: new point D. “New development will be required, as far as practicable, to: ...[INSERT] D. Explore potential for related infrastructure improvements, including the promotion of sustainable travel modes that limit future car use”

65) Policy GM-C 1 World Class Connectivity (mostly agree)

According to the Greater Manchester Low Emissions Strategy consultation document, “road transport contributes 75% of emissions of nitrogen oxides and 81% of particulates across Greater Manchester and it also accounts for 32% of carbon dioxide emissions.”

Also, “private cars typically represents >70% of the vehicle movements on most roads, and so the influence of cars is significant in most areas where high pollutant concentrations have been identified. Furthermore, the large proportion of cars also influences areas of congestion due to the road space taken up by the vehicles.” (Page 56)

In March 2016, the Interim mayor, Tony Lloyd stated that air pollution “could mean that more than 2,000 people in Greater Manchester are dying prematurely each year from diseases and conditions affected by air pollution. We must take action to stop these deaths – doing nothing is not an option.”³⁷

The volume of road traffic needs to be decreased.

The Greater Manchester Spatial Framework must enable a large modal shift through investment in sustainable modes such as walking and cycling and modern public transport systems, particularly areas like Tameside that currently is very poorly served.

The contribution of homeworking to travel reduction and planning of mixed land uses so people can live near to where they work is important.

Manchester Friends of the Earth supports the GMSF emphasis on the need to reduce car-based modes and increase journeys made on public transport, including instigating behavioural change (as is suggested in the policy justification section). However, the GMSF fails to sufficiently reflect these aims in its current wording.

Some further mention of the expectations of intended GMCA bus reform would be useful, as well as direct mention/interaction with the forthcoming GM Cycling and Walking Infrastructure Plan to demonstrate that other plans and policy levers alongside the GMSF are being used to deliver these objectives.

Once again, the approach to major development allocations in the Green Belt (adjacent motorway corridors and the airport) undermine the stated key policy aims, such as **“delivering a pattern of development that minimises the need and distance to travel to jobs**

Manchester Friends of the Earth supports securing investment in new transport infrastructure that “protect our environment” and would ask that greater emphasis is put on this point, especially in the context of climate change mitigation (as well as adaptation aims that are addressed in terms of resilience of infrastructure).

Manchester Friends of the Earth supports the use of the ‘Global Street Design Guide hierarchy’ and trust this approach to be applied to new developments is also embedded and taken forward within local plans that follow.

Manchester Friends of the Earth are mindful of GMCA other non-spatial policy levers which will also assist in discouraging car-based modes. We trust the GMCA will at some point agree to introduce charging clean air zones that include all polluting vehicles as soon as possible to discourage unneeded car journeys and limit environmental, health and air pollution impacts sever road congestion is having.

67) Policy GM-C 3 Walking and Cycling Network (agree)

Manchester Friends of the Earth fully supports the aims of the policy, as per NPPF paras 91³⁸ and 104³⁹ (re Promoting Health and Sustainable Transport Modes).

As stated, the benefits of the GM Cycling and Walking Infrastructure Plan (re cycling and walking) cut across a number of key policy themes, including tackling pollution, reducing climate change, improving health and bringing about social and economic benefits - such as reducing barriers to travel (as identified in the **Transport Topic Paper** and updated **Impact Assessment** for Transport)

We trust the policy aims can be delivered and look forward to publication of the GM Cycling and Walking Infrastructure Plan later this year, which should identify funding to deliver the key aims for the Bee Network.

Manchester Friends of the Earth has some concern that the 2040 Transport Strategy Delivery Plan (2020-25) will fail to earmark substantial funding towards the “bee-lines” project (with reference to the Mayor’s Challenge Fund for walking and cycling).

We welcome the funding for new trams and public transport interchanges. However, we question the funding for new road building/enhancements when the GMCA’s own evidence states that **“road transport alone contributes 65% of emissions of nitrogen oxides and 79% of particulates”** (para 99 – Transport Topic Paper)⁴⁰ and £400 million was earmarked for **“improving junctions and tackling bottlenecks.”**⁴¹

Clarity on this funding issue would be useful as delivery of this project is vital to helping mitigate Greater Manchester’s major traffic issues.

68) Policy GM-C 4 Public Transport Network (mostly agree)

Manchester Friends of the Earth supports major improvements to the public transport network, including links to major existing transport hubs.

We would suggest some further hook/integration with sustainable transport networks mentioned in the wording.

Encouraging people out of their cars, especially for short and medium journeys should be the priority (re para 122 NPPF)⁴² and we support the policy’s attempts to increase journeys made by public transport (including by a variety of modes).

69) Policy GM-C 5 Transport Requirements of New Developments (mostly agree)

The policy justification seems to resign itself to a car-based future, and while autonomous vehicles may come into play at some point and electric car sales are increasing, consideration should be given to the implications of changing trends in vehicle use and ownership, together with a need to facilitate sustainable modes, this does not support a continuation of the status-quo, and requires a different approach to be taken towards the design requirements for new development.

While Manchester Friends of the Earth mostly supports the policy's other aims, Point 9 is crucial to attempt to curb private car use going forward re *"complying with any car parking standards set out in local plans"* and must be amended if any attempt to influence travel behaviours (as set out at GM C 1) are to be realised.

Unless national parking standards are tackled, neither will the assumption that everyone has a right to a parking space and unabated use will continue. We do not seek to penalise car use where it is justified (for disabled, car share, fire or ambulance requirements) but continuing provision of a parking space for every home will not change behaviours to alternative modes of transport. This could be applied depending on whereabouts in Greater Manchester new development is proposed – but especially for the city centre, where alternative sustainable modes are more prevalent.

We feel that the government and housing industry must be challenged on this point, and if the GMSF could reinforce this approach, it would send a strong message that the city-region is looking beyond the outdated model of private car dependency (due to its very clear links to deficiencies in health; impacts on climate change and carbon budgets; detrimental air quality; diminished quality of life et al).

Suggested change: "They will do this by: ...[INSERT] 2) adhering to local GM parking standards for new residential and employment developments. In the Core Growth Area, City Centre and Town Centres only car-share, disabled parking, essential user spaces will be provided for new residential uses (in accordance with relevant 'GM Manual for Streets' parking matrix*). For uses proposed outside these areas, provision will be in accordance with the 'GM Manual for Streets' parking matrix*.

***N.B. 'GM Manual for Streets' parking matrix would constitute relevant parking standards for uses in the Core Growth Area, Manchester City centre and town centres (i.e. those with access to bus, train and metro)**

70 – GM-C 6 – Highway Infrastructure

Manchester Friends of the Earth supports this policy where the aims will be realised in terms of delivering highways improvements to enable a greater uptake of non-car modes and the infrastructure delivers health and environmental benefits.

There is considerable evidence on the issue of inducing more traffic by building new roads and there is an urgent need to reduce our motor dependency.

Twenty years after it was accepted that major road-building didn't work, in spite of all the evidence collected previously, the Government is once again trying to build its way out of congestion. In 2014 the £15 billion 'Road Investment Strategy' (RIS), the biggest roads programme since the 1970s, was announced. The RIS 2 is reported to have earmarked £23.5 billion for more road building.⁴³

A 2017 report from Transport for Quality of Life, entitled "The end of the road? Challenging the road-building consensus" highlighted the most comprehensive evidence to date that building new roads is not the solution.⁴⁴ The TfQL research showed that road schemes:

- induce traffic, that is, generate more traffic – often far above background trends over the longer term
- lead to permanent and significant environmental and landscape damage
- show little evidence of economic benefit to local economies

Manchester Friends of the Earth strongly object to this GMSF policy if it will be used as a means create additional road capacity to service unsustainable employment and housing locations.

71 – GM-C-7 Logistics (mostly disagree)

While Manchester Friends of the Earth supports more sustainable freight movement, we strongly object to the aim of additional throughput and freight movements via Manchester Airport; especially not without a rigorous assessment of the impacts for public health and climate change (especially the government's capacity to meet current and future Carbon Budgets linked to the Climate Change Act 2008).

Have climate and health impact assessments of these options have been undertaken? What are GMCA's alternative options if the Committee on Climate Change (CCC) does not support such aims? What other reasonable alternatives have been considered in light of this very real possibility?

Manchester Friends of the Earth supports better linkages to existing canal networks and protection of existing water and rail-served sites, as such modes are more sustainable than via road.

We fear the proposed “need” for consolidation and distribution sheds in this policy may however be used as a justification for substantial green belt release, which we cannot support. As stated above, existing employment sites are available across Greater Manchester, as demonstrated by individual employment land reviews for its 10 councils and while the NPPF supports employment sites at “*a variety of scales and at suitable, accessible locations*” – (para 82), this should not override the need to maintain the permanence of the greenbelt and protect it and would not justify exceptional circumstances.

72) Policy GM-C 8 Streets For All (agree)

Manchester Friends of the Earth supports the policy’s aims to encourage more walking and cycling and an attempt to reverse the car dominated hegemony. The policy is both in line with and goes beyond NPPF aspirations.

We consider more clarity would be useful as to where potential retrofitting of parts of GM are likely to take place and/or whether the policy is more for new master-planned developments going forward.

End Notes

¹ Manchester Friends of the Earth is an award-winning environmental group, creatively campaigning on local, national and international issues. We are fuelled by volunteer energy and funded by membership subscriptions and donations. See www.manchesterfoe.org.uk

² <https://www.manchesterfoe.org.uk/blog/2017/01/15/manchester-friends-of-the-earth-response-to-the-greater-manchester-spatial-framework-consultation/>

³ <https://policy.friendsoftheearth.uk/publications/planning-less-car-use>

⁴ <https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making>

⁵ <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>

⁶ <https://www.greatermanchester-ca.gov.uk/ourpeopleourplace>

⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/11-making-effective-use-of-land>

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- ⁸ "Manchester Airports Group (MAG) has ambitious plans to grow its passenger market from 24 million trips per annum in 2016 to 45 million, delivering over £2bn to the UK Economy and providing up to 60,000 jobs in the wider region" Greater Manchester 2040 Transport Strategy, Page 62. <https://www.tfgm.com/2040>
- ⁹ <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>
- ¹⁰ ITV News 23rd March 2018. <https://www.itv.com/news/granada/update/2018-03-23/major-scheme-to-tackle-greater-manchesters-congestion-problem/>
- ¹¹ <https://t.co/Pv5MwISxYc> "Greater Manchester residents travel 37 million km per day averaging 6.4km per person. 77% of all kilometres travelled are done so by car (either as driver or passenger)." (19/1/2018)
- ¹² <https://policy.friendsoftheearth.uk/publications/more-electric-cars>
- ¹³ <https://www.greatermanchester-ca.gov.uk/media/1744/natural-environment-topic-paper-w-cover-web.pdf>
- ¹⁴ <http://www.cityoftrees.org.uk/>
- ¹⁵ <https://www.greatermanchester-ca.gov.uk/media/1743/employment-topic-paper-w-cover-web.pdf>
- ¹⁶ <https://www.greatermanchester-ca.gov.uk/media/1743/employment-topic-paper-w-cover-web.pdf>
- ¹⁷ <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>
- ¹⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>
- ¹⁹ <https://www.theccc.org.uk/wp-content/uploads/2018/06/CCC-letter-to-DfT-on-Airports-National-Policy-Statement.pdf>
- ²⁰ 11th February 2019. Councils across Greater Manchester are planning to invest more than £50m in the construction of a multi-storey parking facility at Manchester Airport. <https://www.airport-technology.com/news/car-park-manchester-airport/>
- ²¹ <https://www.gov.uk/guidance/national-planning-policy-framework/3-plan-making>
- ²² The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>
- ²³ Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>
- ²⁴ <https://www.theguardian.com/cities/ng-interactive/2019/jan/30/high-street-crisis-town-centres-lose-8-of-shops-in-five-years>
- ²⁵ <https://www.greatermanchester-ca.gov.uk/media/1744/natural-environment-topic-paper-w-cover-web.pdf>
- ²⁶ <https://policy.friendsoftheearth.uk/publications/transforming-public-transport>

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- ²⁷ <https://policy.friendsoftheearth.uk/publications/net-gain-new-threat-nature>
- ²⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change>
- ²⁹ <https://www.climatechangenews.com/2018/01/05/uk-government-details-coal-power-phase-strategy/>
- ³⁰ <https://www.leighday.co.uk/LeighDay/media/LeighDay/documents/Fracking/Stephenson-v-Sec-State-for-Housing-Communities-QBD-6-3-19.docx>
- ³¹ <https://www.theccc.org.uk/2019/02/21/uk-homes-unfit-for-the-challenges-of-climate-change-ccc-says/>
- ³² <https://www.theguardian.com/environment/2018/nov/15/tree-planting-double-uk-climate-change>
- ³³ <http://www.legislation.gov.uk/uksi/1997/1160/schedule/1/made>
- ³⁴ <https://policy.friendsoftheearth.uk/publications/net-gain-new-threat-nature>
- ³⁵ <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>
- ³⁶ (c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; <https://www.gov.uk/guidance/national-planning-policy-framework/11-making-effective-use-of-land>
- ³⁷ <http://archive.tfgm.com/Corporate/connections/Documents/Connections-March-2016.htm>
- ³⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities>
- ³⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>
- ⁴⁰ <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>
- ⁴¹ ITV News 23rd March 2018. <https://www.itv.com/news/granada/update/2018-03-23/major-scheme-to-tackle-greater-manchesters-congestion-problem/>
- ⁴² (c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use; <https://www.gov.uk/guidance/national-planning-policy-framework/11-making-effective-use-of-land>
- ⁴³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/752066/draft-road-investment-strategy-2-governments-objectives.pdf
- ⁴⁴ <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>