

**2<sup>nd</sup> October 2021**

**Places For Everyone - Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan consultation - Manchester Friends of the Earth response.**

**1. Introduction**

1.1 Thank you for the opportunity to comment on the Places For Everyone. Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan plan (abbreviated as P4E in our response).<sup>1</sup>

1.2 Manchester Friends of the Earth, is a Greater Manchester-based environmental campaigning organisation working on a range of issues that includes sustainable transport, aviation and climate change.<sup>2</sup>

1.3 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.

1.4 The P4E plan should enable net zero-carbon homes, liveable neighbourhoods accessible by sustainable transport, and access to green space and clean air for everyone as a key priority.

1.5 In summary, Manchester Friends of the Earth:

- believe that the Places for Everyone plan does not sufficiently reflect the urgent need to reduce climate change emissions in Greater Manchester and tackle the climate and ecological emergencies.

- wholly supports new developments being zero net carbon but believes that too much time is being given for developers to meet the GM 2028 zero-carbon homes deadline - the compliance date should be brought forward to 2023.
- believes that the P4E plan fails to be compliant with NPPF paragraph 138 on green belt purpose and paragraph 140 in terms of 'exceptional circumstances' through local plan review.
- 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 does not support biodiversity net gain in an environmental context.
- asks the Greater Manchester Combined Authority 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.

1.6 We have outlined in our submission where we believe that the P4E plan is unsound with respect to enabling the delivery of sustainable development as required by the NPPF and does not conform with the actions required to meet Greater Manchester's target of becoming a carbon neutral city-region by 2038. It is essential that the P4E plan faces up to the climate and nature emergencies with strong policies to cut carbon emissions and enhance nature and access to green space for everyone.

1.7 We understand that this consultation is undertaken as the 'Publication Stage' within Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. We have therefore considered the Places for Everyone plan policies and site allocations on the basis of the 'test of soundness' as set of in the National Planning Policy Framework (NPPF).(\*)

## **2. Strategic Objectives**

2.1 In broad terms, Manchester Friends of the Earth welcomes the plan's stated aims; two, six, seven, eight and ten that promote sustainable development that supports our ability to reduce carbon emissions and enhance biodiversity while promoting the health and wellbeing of the population.

Objective 2	Create neighbourhoods of choice that “Prioritise sustainable modes of transport to reduce the impact of vehicles on communities”
Objective 6	Promote the sustainable movement of people, goods and information. ”Ensure new development is designed to encourage and enable active and sustainable travel”
Objective 7	Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region We will: Promote carbon neutrality of new development by 2028; Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air; Locate and design development to reduce car dependency; Facilitate provision of infrastructure for cleaner vehicles; Improve energy efficiency and the generation of renewable and low carbon energy.
Objective 8	Improve the quality of our natural environment and access to green spaces. We will: Enhance special landscapes, green infrastructure, biodiversity and geodiversity; Improve access to the natural environment and green spaces including parks; Promote the role of green space in climate resilience and reducing flood risk.
Objective 10	Promote the health and wellbeing of communities. Reduce the health impacts of air pollution through accessibility of sustainable travel such as public transport, cycling and walking; Maximise the health benefits of access to the natural environment and green spaces;

2.2 We note that these objectives are also embedded in a range of Greater Manchester policies covering the nine local authority areas - including the Greater Manchester Strategy, five-year environment plan for Greater Manchester,<sup>3</sup> individual local authority climate change action plans, and the Greater Manchester Clean Air Plan.

2.3 In particular we would like to draw attention to the Five-year Environment Plan for Greater Manchester (5YEP) that aims to reach carbon neutrality by 2038 (a year after the life-time of the P4E time frame), and requires 15% cuts in emissions per year. The 5YEP states that this is ‘extremely challenging’ and calls for radical action on all fronts including the need to eliminate emissions from cars, and public transport; and a 75% reduction in freight emissions.<sup>4</sup> The 5YEP also requires approximately two-thirds reduction in domestic energy use.

2.4 A Greater Manchester Strategy report (May 2021) updating the GMS Priority Seven (Green City region) performance against climate change objectives demonstrated poor performance towards these targets making it even more essential that we increase efforts to tackle climate change and that the P4E plan embeds radical climate change action at the core of all strategies, economic activity and development in Greater Manchester.<sup>5</sup> (See image below)

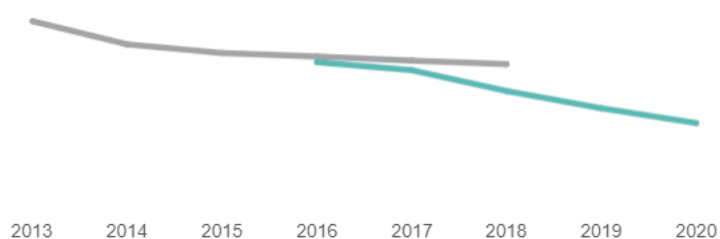
By 2020, GM will have reduced **CO<sub>2</sub> emissions** to 7.1 mt, down from 13.6 mt in 2014



**11.9 mt** of CO<sub>2</sub> emissions for **GM** in 2018  
or **4.2 t** per capita

**2.2 mt** behind the target trajectory

A reduction of **0.3 mt** from 2017



2.5 Since the last consultation on the Greater Manchester Spatial Framework (GMSF) the UK Government has introduced the Statutory Instrument 1056 Climate Change: The Climate Change Act (2050 Target Amendment) Order 2019, which placed a duty on the Secretary of State to ensure net UK carbon for the year 2050 is 100% lower than the 1990 baseline.

2.6 On 9<sup>th</sup> August 2021, the latest Intergovernmental Panel on Climate Change report was described by UN Secretary-General António Guterres as a “code red for humanity”. In his statement, the UN Secretary General said “We are already at 1.2 degrees and rising. Warming has accelerated in recent decades. Every fraction of a degree counts. Greenhouse

gas concentrations are at record levels. Extreme weather and climate disasters are increasing in frequency and intensity. That is why this year's United Nations climate conference in Glasgow is so important."<sup>6</sup>

2.7 The increased significance and the urgency of actions needed to tackle climate change require a radical review of all planning policies and strategies. Manchester Friends of the Earth believes that the current Places for Everyone plan does not meet the urgent need to reduce climate change emissions in Greater Manchester.

2.8 Therefore we would recommend that the P4E Strategic Objectives should be re-ordered to make becoming carbon neutral and improving the quality of the environment as the first and second strategic objectives and that all P4E Strategies and Policies be re-assessed against the urgent need to radically reduce climate emissions.

### **3. Policy JP-Strategy**

#### **3.1 Policy JP-Strat 1 Core Growth Area, Policy JP-Strat 2 City Centre, Policy JP-Strat 3 The Quays, Policy JP-Strat 5 Inner Areas and Policy JP-Strat 12 Main Town Centres.**

3.1.1 While Manchester Friends of the Earth supports proposals for improvements to green infrastructure within these areas we would highlight the need for provision of new green infrastructure, including open spaces in addition to enhancing what exists already.

3.1.2 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).

3.1.3 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.

3.1.4 Improvements in the public realm, walking and cycling facilities, and green infrastructure, with active encouragement of car-free developments, will help to enhance the local character and environmental quality of the City Centre so that it can rival city centres

across the globe, enabling it to compete effectively at the international level for investment, businesses, skilled workers, residents and tourists.

### **3.2 Policy JP-Strat 4 Port Salford**

3.2.1 Manchester Friends of the Earth are concerned that additional road based haulage in an area that already has poor air quality and noise performance is not a sustainable policy choice. The green belt land in this area provides an important 'Green lung' function and also meets most of the five Green Belt purposes set out in the NPPF.<sup>7</sup>

3.2.2 The air quality at this site is already very poor. We note that the World Health Organisation (WHO) recently lowered their air pollution limits. In addition, in 2017 Greater Manchester became a WHO BreatheLife city region<sup>8</sup> and pledged to meet WHO air quality guidelines by 2030 and the new WHO limits may become legally required if incorporated into the Environment Bill as recently recommended by the House of Lords.<sup>9</sup>

3.2.3 We are concerned that the Port users will in reality not rely equally on road, water and rail based modes of transport but that road-based haulage will continue to be the dominant mode - with poor outcomes for air pollution, congestion, climate emissions and noise. The GMCA need to provide policy support for equal shares of water and rail based transport, and limit the volume of HGV movements.

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

### **3.3 Policy JP-Strat 6 Northern Areas,**

3.3.1 While Manchester Friends of the Earth supports the idea of focusing on these areas, the narrow focus on 'enhancing competitiveness' to justify major greenbelt release along the principal motorway network – is highly unsustainable and contrary to the NPPF.

3.3.2 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.

3.3.3 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.

3.3.4 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).<sup>10</sup>

3.3.5 We would argue 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.

3.3.6 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.<sup>11</sup> Research published in July 2021 highlighted that post Covid-19 pandemic, 37% of respondents expected to work from home on a regular basis and around 22% would work from home all the time, compared to only 9% pre-pandemic. (CIPD)

3.3.7 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".

### **3.4 JP- Strat 7 North East Growth Corridor**

3.4.1 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 previous 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). This growth option puts new housing allocations near to these noisy, polluted corridors.

3.4.2 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.

3.4.3 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.

3.4.4 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 also recommend that the current distance from residential developments and a sustainable transport hub should be reduced.

3.4.5 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. The P4E plan provides for at least 3,330,000 sqm of new, accessible, industrial and warehousing floorspace in Greater Manchester over the period 2021-2037. Manchester Friends of the Earth believes that this figure is too high and much of this development is focused in the Green Belt causing a significant extent of Green Belt harm, whilst the P4E plan identifies an additional 480,000 sqm likely to be delivered after 2037.

3.4.6 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"**.<sup>12</sup>

3.4.7 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.

3.4.8 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 Green Belt.



3.4.9 Manchester Friends of the Earth does not consider that the scale of the proposed delivery of new employment floorspace and homes justifies Green Belt loss on this scale.

3.4.10 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.

### **3.5 Policy JP-Strat 8 Wigan-Bolton Growth Corridor**

3.5.1 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.

3.5.2 B8 warehousing has extremely large footprints, of low staff density and are usually road-based for logistics and staff travel. There is considerable environmental impact for limited benefit as the jobs are often low paid, low skills and predicted to be replaced via automation.

3.5.3 We do not believe that there has been genuine consideration of the cumulative harm or impact. 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.

3.5.4 More recently, there has been an increase in ‘off local plan’ applications and the Green Belt along the motorway has seen the development of ‘mega-sheds’ causing significant landscape impact.

### **3.6 Policy JP-Strat 9 Southern Areas and Policy JP-Strat 10 Manchester Airport Policy**

3.6.1 Emissions of greenhouse gases from aviation<sup>13</sup> are becoming increasingly important. They were 8% of the UK total in 2019<sup>14</sup>, with most being from long-haul international flights<sup>15</sup>. While relatively small, this proportion was still increasing before the COVID-19 pandemic. Between 1990 and 2019, domestic and international aviation emissions more than doubled<sup>16</sup>, while overall UK emissions are estimated to have reduced by 45%.<sup>17</sup> The number of flights dropped substantially in 2020 due to the pandemic, but the Committee on Climate Change (CCC) expects a return to previously projected demand levels from 2024 in most scenarios.

3.6.2 Greenhouse gases and other emissions from aviation are a growing cause of global warming. There are no easy technical fixes to this problem. Instead, to avoid dangerous climate change we need to act urgently to reduce emissions from flying. Manchester Friends of the Earth believe that an ambitious emissions reduction target is needed. This will require higher taxes – they should be fair and based on the “polluter pays” principle.

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

3.6.4 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 JP-Strategy 6 Northern Areas.

3.6.5 Manchester Friends of the Earth would also query how 500,000m<sup>2</sup> of new office, logistics, hotel and manufacturing space and 2,400 residential units at this location would meet the strategic objective to reduce daily car-based commuter trips below 50% across Greater Manchester (see Our Vision for 2040 – the Right Mix.

3.6.6 The previous Transport Topic Paper suggested that 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, it is likely that the development will increase journeys made by private motor vehicles.

3.6.7 However, the Transport Statistics Great Britain 2019 report stated that whilst half of Stansted Airport passengers travelled by public transport in 2018, in contrast, Manchester Airport “saw the highest proportion (81%) of passengers who travelled using a private vehicle.” (Page 7).<sup>18</sup> The 2019 proportion was 80% of passengers and car parking provision at both Manchester Airport and Airport City continues to increase.

3.6.8 Further unacceptable air quality impacts from car journeys are a likely result of these development and together with increased aviation climate impacts from the stated policy of nearly doubling passenger throughput leads Manchester Friends of the Earth to argue that this Strategy fails the soundness tests of the NPFF (re see paras 25, 105 and 186).<sup>19</sup>

### 3.7 Policy JP-Strat 11 New Carrington

3.7.1 Manchester Friends of the Earth supports the reuse of brownfield land at this strategic site allocation. However, we cannot support the harmful impact on the peat mossland that the proposed new road and major housing and employment developments will have.

3.7.2 Policy JP-G4 in the P4E plan highlights the importance of lowland wetlands and mosslands, and para 8.26 of the strategy highlights the importance of peatlands and the Greater Manchester Nature improvement area and Para 8.28 states that restoration of these mosslands will ‘make a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon’.

3.7.3 The P4E Carbon and Energy Policy section (JP-S 2) highlights that “Increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques” is one of the measures that will help deliver a carbon neutral Greater Manchester no later than 2038. It is therefore incompatible with the plans for the Carrington Moss development.

3.7.4 Organisations ranging from Natural England to Friends of the Earth have highlighted the importance of retaining and restoring our peatlands with Friends of the Earth calling for the Government to ensure it funds the restoration of ‘its peatlands’.

3.7.5 Natural England in their report ‘England’s peatlands<sup>20</sup>: Carbon storage and greenhouse gases’ states that the “Planning and Climate Change supplement to Planning Policy Statement 1 (on ‘delivering sustainable development’) is clear that regional spatial strategies should ‘recognise the potential of, and encourage, those land use and land management practices that help secure carbon sinks.’ This document also recognises that development should contribute where possible to protect and enhance biodiversity and mitigate against climate change.

3.7.6 The P4E states that “the Carrington area is included in the Great Manchester Wetlands Nature Improvement Area and has been identified as a potentially important part of a developing Wetlands Ecological Network. In addition, the conservation of organic soils will help to reduce carbon emissions.” (para 11.341).

3.7.7 The National Planning Policy Framework states that whilst planning policies should provide for the extraction of mineral resources of local and national importance they must “not identify new sites or extensions to existing sites for peat extraction;” (Para 210 a) and should “not grant planning permission for peat extraction from new or extended sites”. (Para 211 d).<sup>21</sup> We would argue that whether or not the peat extracted will be sold commercially is irrelevant to this case – the peat should stay in the ground.

3.7.8 Given Natural England's, Friends of the Earth's and the Places for Everyone plan itself, highlights the importance of preserving and restoring peatland as well as the National Planning Policy Framework (NPPF) requirements - we argue that the development plans at Carrington and other mosslands across Greater Manchester are **unsound and call for these plans to be withdrawn**.

### **3.8 JP-Strat 12 Main Town Centres**

3.8.1 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 notes that this policy proposes a business as usual approach by focusing on retail.

3.8.2 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 years - Guardian 2019),<sup>22</sup> 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.

3.8.3 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 offerings 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 in the light of Brexit and the Covid-19 pandemic.

### **3.9 Policy JP-Strat 13 Strategic Green Infrastructure**

3.9.1 Manchester Friends of the Earth welcomes the intention to protect and enhance these valuable assets. However, any Strategic Green Infrastructure must be more than 'just' a collection of green spaces; and the P4E 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.

3.9.2 We would also support the calls from CPRE and the Organic Research Centre<sup>23</sup> for the Green Infrastructure strategy to require local authority and developers to implement their obligations to protect and develop hedgerows. Hedgerows are a haven for nature, they help remove carbon and also support sustainable local economies - however since the Second World War we have lost 50% of our hedgerows and they continue to decline.

3.9.3 The Hedgerows Regulations were introduced in 1997 and there is a statutory requirement for local planning authorities to look after those considered important, i.e. those over 20 metres long and at least 30 years old and hedgerows that are home to a certain number of plant or animal species.

### **3.10 Policy JP-Strat 14 A Sustainable and Integrated Transport Network**

3.10.1 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 would like to see a higher modal shift target.

3.10.2 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. (Friends of the Earth briefing: Transforming Public Transport).<sup>24</sup>

3.10.3 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.

3.10.4 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 consideration in terms of acceptable space standards.

3.10.5 Whilst Manchester Friends of the Earth supports modal shift to public transport and active travel, we remain opposed to HS2 due to the harm to the countryside in protected Green Belt areas at some distance from Manchester and also due to the opportunity costs where HS2 funding is diverting money that is needed for buses, trams, walking, cycling and other railway projects if we are to beat climate change and cure commuter hell. (Friends of the Earth briefing: The Opportunity Costs of HS2).<sup>25</sup>

3.10.6 As with the Transport Strategy outlined in the previous Greater Manchester Spatial Framework iteration, the P4E Sustainable and Integrated Transport Network' policy includes commendable statements on encouraging people to choose sustainable transport modes that will reduce air pollution and help tackle climate change emissions.

3.10.7 Strategy JP-14 states that the "local programme of investment needs to be complemented by significant national and regional projects such as HS2". However, what it fails to mention is that these "significant national and regional projects" include a number of motorway and primary network road schemes such as the A57 Mottram Bypass and the scheme referenced in the Wigan-Bolton road corridor policy. Para 2.16 refers to 'motorway network enhancements' and 2.27 lists a range of road schemes with no sustainability context. In contrast to the aspiration to provide sustainable public transport modes - in most cases these road schemes have already been allocated Government funding.

3.10.8 The following section from the Policy JP-Strat 8 - Wigan-Bolton Growth Corridor allocation highlights the disparity in priority given to highway infrastructure versus public transport. "New highway infrastructure **will** connect Junction 26 of the M6 and Junction 5 of the M61 including public transport provision. Measures to improve the provision of bus services and to increase the use of rail lines will be implemented, **potentially** including a Wigan to Bolton Quality Bus Transit corridor...." (emphasis added). A disparity repeated within many of the site allocation policies. Public transit options need to be prioritised not seen as "potential" options.

3.10.9 The extent of Greater Manchester's support for road building or widening schemes can be identified in the Greater Manchester Transport Plan 2040 and the associated five-year transport delivery plan (2021-26).<sup>26</sup> The Strategy JP-14 fails to identify that these motorway and other major road schemes will both increase air pollution and climate change emissions and we would argue fail to meet National Planning Policy Framework objectives.

3.10.10 We note that the World Health Organisation (WHO) recently lowered their air pollution limits and now recommends that PM2.5 and NO2 should not exceed an annual mean concentration of 5 micro-grams per cubic metre and 10 micro-grams per cubic metre respectively. The current plans for the Greater Manchester Clean Air Zone are not modelled on reaching these lower air pollution limits.

3.10.11 In 2017, Greater Manchester became a WHO BreatheLife city region<sup>27</sup> and pledged to meet WHO air quality guidelines by 2030 and the new WHO limits may become legally required if incorporated into the Environment Bill as recommended by the House of Lords.

3.10.11 The supported road upgrades/ improvements in and immediately adjoining Greater Manchester are likely to increase air pollution, induced traffic levels, noise and community severance. Manchester Friends of the Earth therefore objects to this policy.

### **3.11 Policy JP-S 1 Sustainable Development.**

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 the 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 does 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. (Friends of the Earth Policy Briefing - Net Gain – the new threat to nature).<sup>28</sup>

### **3.12 Policy JP-S 2 Carbon and Energy**

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

3.12.2 We therefore query whether some of the strategic policies (including Policy JP-Strat 7 – M62 NE Growth Corridor and Policy JP-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.

3.12.3 We support the remaining aims, especially that the GMCA commitment “to keep fossil fuels in the ground remains, at this time therefore we will not support fracking.”

3.12.4 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.



3.12.5 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”<sup>31</sup>.

3.12.6 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. It is not logical or rational to continue to permit homes to be built that will need to be retrofitted in the near future.

3.12.7 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.

3.12.8 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.

3.12.9 Manchester Friends of the Earth would recommend that the P4E plan be more specific about how much renewable energy would be needed, across the different types of energy technologies. (Table 5.1).

3.12.10 Manchester Friends of the Earth would suggest that the GMCA through P4E take a positive approach to renewable and low carbon energy schemes; and make solar arrays compulsory to all existing and new commercial, industrial and residential development across GM from 2023.

### **3.13 Policy JP-S 3 Heat and Energy Networks**

3.13.1 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.



### **3.14 Policy JP-S 4 Resilience**

3.14.1 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.

### **3.15 Policy JP-S 5 Flood Risk and the Water Environment**

3.15.1 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).

### **3.16 Policy JP-S 6 Clean Air**

3.16.1 Manchester Friends of the Earth supports many of the air quality measures outlined in this Policy. However, there is a clear need for greater clarity in the overall approach, as strategic policies advocating green belt growth adjacent to 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).

3.16.2 Such developments appear to be at odds with the aims of this policy including:

- 1) "Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution", and
- 11) "Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users."

3.16.3 The P4E clean air policy is significantly weaker than the Greater London Authority Policy SI1, 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.

3.16.4 In contrast the P4E policy is at best a weak list of mitigation measures and in particular seems to allow polluting development provided that the pollution is monitored – for example see point 3 in the policy.

3.16.5 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 located within 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 HGV dependent and so will lead to worsening air quality.

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

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

### **3.17 Policy JP-C 1 Our Integrated Network**

3.17.1 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).

3.17.2 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.

3.17.3 We note, however that 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 represent >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). The volume of road traffic needs to be decreased.

3.17.4 The P4E plan must enable a large modal shift through investment in sustainable modes such as walking and cycling and modern public transport systems. The contribution of homeworking to travel reduction and planning of mixed land uses so people can live near to where they work is important.

3.17.5 Manchester Friends of the Earth supports the P4E 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 approach to major development allocations in the Green Belt (adjacent motorway corridors and the airport) undermine the stated key policy aims, such as “delivering sustainable patterns of development that minimise the need to travel and reliance on the car.” (para 5.4)

### **3.18 Policy JP-C 3 Public Transport**

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

3.18.2 Encouraging people out of their cars, especially for short and medium journeys should be the priority (re para 124 (c) NPPF)<sup>29</sup> and we support the policy’s attempts to increase journeys made by public transport (including by a variety of modes).

### **3.19 Policy JP-C 4 Streets For All**

3.19.1 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.

### **3.20 Policy JP-C 5 Walking and Cycling**

3.20.1 Manchester Friends of the Earth fully supports the aims of the policy, as per NPPF para 104 to 113 (re Promoting Health and Sustainable Transport Modes).

3.20.2 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 previous Transport Topic Paper and updated Impact Assessment for Transport).

3.20.3 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 network” project (with reference to the Mayor’s Challenge Fund for walking and cycling).

3.20.4 We welcome the funding for new trams and public transport interchanges

### **3.21 Policy JP-C 6 Freight and Logistics**

3.21.1 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).

3.21.2 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.

3.21.3 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. Existing employment sites are available across Greater Manchester, as demonstrated by individual employment land reviews.

3.21.3 Whilst the NPPF supports employment sites at "a variety of scales and at suitable, accessible locations" – (para 83)<sup>30</sup>, this should not override the need to maintain the permanence of the greenbelt and protect it and would not justify exceptional circumstances.

### **3.22 Policy JP-C 7 Transport Requirements for New Developments**

3.22.1 While Manchester Friends of the Earth mostly supports the policy's other aims, Point 7 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 are to be realised.

3.22.2 Without addressing this issue, 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.

3.22.3 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.

3.22.4 We feel that the government and housing industry must be challenged on this point, and if the P4E 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).

3.22.5 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)

### **3.23 Policy JP-D1 Infrastructure Implementation**

3.23.1 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.

3.23.2 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.

3.23.3 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 has allocated circa £27 billion for more road building / widening schemes.

3.23.4 A 2017 report from Transport for Quality of Life, entitled “The end of the road? Challenging the road-building consensus”<sup>31</sup> highlighted the most comprehensive evidence to date that building new roads is not the solution.

3.23.5 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

3.23.6 At the Greater Manchester level we also question the funding for new road building / widening schemes. In 2018 it was reported that £400 million was earmarked for “improving junctions and tackling bottlenecks”<sup>32</sup> dwarfing the new investments in Metrolink and Active Travel measures.

3.23.7 In November 2019, a senior Transport for Greater Manchester officer acknowledged that whilst the Regent Road scheme had given a 10-15% increase to capacity levels that this “capacity had soon been filled” clearly reinforcing the ‘induced traffic’ argument.<sup>33</sup>

3.23.8 Manchester Friends of the Earth strongly object to this P4E policy if it will be used as a means to create additional road capacity to service unsustainable employment and housing locations, particularly 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).<sup>34</sup>

### **3.24 Policy JP-G 1 Valuing Important Landscapes**

3.24.1 Manchester Friends of the Earth supports the policy 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.

### **3.25 Policy JP-G 2 Green Infrastructure Network**

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

3.25.2 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 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.

3.25.3 We welcome the policy references to tree planting. The Committee on Climate Change (CCC) have highlighted the benefits of planting trees for reducing CO<sub>2</sub> levels and helping the UK meet current and future Carbon Budgets going forward. The CCC have previously stated 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)* would mean the policy is justified linked to the tests of soundness (re based on sound evidence).

3.25.4 There should also be a focus on ‘bringing the countryside into the city’. We recommend reference to the Hedgerow Regulations 1997<sup>35</sup> as this offers statutory protection in recognition of the importance to local archaeology and history, and wildlife and landscape.

3.25.5 Figure 8.3 ‘Green Infrastructure Opportunity Areas’) broadly identifies areas having particular potential for delivering improvements to our Green Infrastructure Network. Bullet Point m) lists Carrington (Trafford). Therefore we find it difficult to understand how the Policy JP-Strat 11 New Carrington which proposes a new relief road, 4,300 houses and 350,000sq.m of employment floorspace can be found considered “sound” as there is a clear conflict with the aims of protecting priority habitat of significance for the benefit of future generations.

### **3.26 Policy JP-G 3 River valleys and waterways**

3.26.1 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.

3.26.2 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).

3.26.3 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.

### **3.27 Policy JP-G 4 Lowland Wetland and Mosslands**

3.27.1 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).

3.27.2 However, as highlighted in previous sections (**Policy JP-Strat 11 New Carrington**) we are concerned at the reference to some areas of undeveloped mossland being considered appropriate for future development and we strongly object to these proposals. This text should be deleted to best protect this rare and threatened habitat.

3.27.3 P4E para 8.30 states that lowland bog areas “will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.” However, the New Carrington area is significantly high ecological value. Therefore we would again argue that Policy JP-Strat 11 New Carrington is contrary to the stated ambitions of protecting and enhancing lowland wetlands and mosslands.

### **3.28 Policy JP-G 5 Uplands**

3.28.1 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.

3.28.2 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.

### **3.29 Policy JP-G 6 Urban Green Space**

3.29.1 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 JP-G 2 Green Infrastructure Network above)

3.29.2 However, the inclusion of 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.

3.29.3 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).

3.29.4 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.



3.29.5 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.

### **3.30 Policy JP-G 7 Trees and Woodland**

3.30.1 Manchester Friends of the Earth supports this policy as it's in line with our newest campaign objectives (see detail on policy JP-G 2 for further information).

We support the Greater Manchester Trees and Woodland Strategy.

### **3.31 Policy JP-G 8 Standards for a Greener Greater Manchester**

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

3.31.2 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. (Friends of the Earth briefing: Net Gain – the new threat to nature ).<sup>36</sup>

3.31.3 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 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.

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

3.31.5 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.

### 3.32 Policy JP-G 9 A Net Enhancement of Biodiversity and GeoDiversity

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

3.32.2 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.

3.32.3 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 JP-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.

3.32.4 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).

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

3.32.6 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 174)**

### 3.33. Policy JP-G 10 The Greater Manchester Green Belt.

3.33.1 Manchester Friends of the Earth notes that this most current version of the strategy has reduced the allocation of Green Belt for development, a move we welcome. However, Manchester Friends of the Earth does not support the removal of such strategic tracts of land from the Green Belt. NPPF Paras 137 reiterates the Government commitment to Green Belt and its aim of keeping land permanently open. Para 138 sets out the five purposes, namely:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

3.33.2 Para 139 states “the general extent of Green Belts are already established”, and Para 140 goes on to state “once established boundaries should only be altered in exceptional circumstances”. The NPPF also states that **“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”**

3.33.3 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 again we ask for more detail to what is actually meant.

3.33.4 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.

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

3.33.6 Manchester Friends of the Earth believes that the Places for Everyone plan fails to be compliant with NPPF paragraph 138 on green belt purpose and paragraph 140 in terms of ‘exceptional circumstances’ through local plan review.

### **3.34 Policy JP-J 1 Scale, Distribution and Phasing of New Housing Development**

3.34.1 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.

3.34.2 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.

34.3 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 Greater Manchester.

3.34.4 Manchester Friends of the Earth recommends that the P4E plan should also encourage the introduction of car-free developments.

3.34.5 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.

### 3.35 Policy JP-P 6 Health

3.35.1 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.

3.35.2 However, the 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 previous **Transport Topic Paper** details how car use is detrimental to many of the plans overarching policy aims.

Manchester Friends of the Earth  
2<sup>nd</sup> October 2021.

### End notes

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<sup>1</sup> <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/the-plan/>

<sup>2</sup> 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](http://www.manchesterfoe.org.uk)

<sup>3</sup> <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

<sup>4</sup> Five-year environment plan for Greater Manchester - Executive Summary. Page 6. "Informing the scale of the challenge we face – reductions on this scale will be extremely challenging to achieve, requiring unprecedented transformational change and financial investment."

<sup>5</sup> [https://www.gmtabureau.nhs.uk/t/GMCA/views/GMSPrioritySeven-May2021/GMSPrioritySeven?origin=card\\_share\\_link&embed=y&isGuestRedirectFromVizportal=y](https://www.gmtabureau.nhs.uk/t/GMCA/views/GMSPrioritySeven-May2021/GMSPrioritySeven?origin=card_share_link&embed=y&isGuestRedirectFromVizportal=y)

<sup>6</sup> <https://unric.org/en/guterres-the-ipcc-report-is-a-code-red-for-humanity/>

<sup>7</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

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<sup>8</sup> <https://www.businessgrowthhub.com/green-technologies-and-services/green-intelligence/resource-library/greater-manchester-becomes-uk-s-first-breathelife-region>

<sup>9</sup> <https://airqualitynews.com/2021/09/07/house-of-lords-vote-in-favour-of-stricter-air-pollution-laws/>

<sup>10</sup> <https://www.greatermanchester-ca.gov.uk/media/1743/employment-topic-paper-w-cover-web.pdf>

<sup>11</sup> 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”. See <https://www.greatermanchester-ca.gov.uk/media/1743/employment-topic-paper-w-cover-web.pdf>

<sup>12</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

<sup>13</sup> Greenhouse gas emissions from aviation: These include carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), water vapour, and some methane (CH<sub>4</sub>). Of these, CO<sub>2</sub> has by far the largest effect. Carbon dioxide, methane and nitrous oxide are among a basket of greenhouse gases identified by the Kyoto Protocol, which also includes methane, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF<sub>6</sub>). The UK Climate Change Act of 2008 limits emissions of Kyoto Protocol gases. Water vapour is not a Kyoto Protocol gas, and so isn't covered by the Act.

<sup>14</sup> Proportion of aviation emissions: The CCC reported to Parliament in June 2020 that 8% of UK emissions in 2019 were from aviation. Committee on Climate Change, “Reducing UK emissions - Progress Report to Parliament”, 2020, page 22, <https://www.theccc.org.uk/wp-content/uploads/2020/06/Reducing-UK-emissions-Progress-Report-to-Parliament-Committee-on-Cli...-002-1.pdf>

<sup>15</sup> Most aviation emissions are from long-haul flights: Committee on Climate Change, “The Sixth Carbon Budget - Aviation”, 2020, page 17, <https://www.theccc.org.uk/publication/sixth-carbon-budget>

<sup>16</sup> Non-military aviation emissions more than doubled: Emissions from domestic and international aviation in 2018 were 124% above 1990 levels (and were higher in 2019). Military aviation emissions have fallen 71% from 1990 levels. Committee on Climate Change, “The Sixth Carbon Budget - Aviation”, 2020, page 7, <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

<sup>17</sup> Overall UK emissions reduced by 45%: Provisional government figures show that in 2019, total UK greenhouse gas emissions were 45.2% lower than in 1990. Department for Business, Energy & Industrial Strategy, “2019 UK greenhouse gas emissions, provisional figures – statistical release”, 2020, page 1, <https://www.gov.uk/government/statistics/provisional-uk-greenhouse-gas-emissions-national-statistics-2019>

<sup>18</sup> See also TSGB0207 (AVI0107): Mode of transport to the airport <https://www.gov.uk/government/statistical-data-sets/tsgb02#air-traffic-at-uk-airports>  
The 81% figure included trips made by Private Car, Hire Car or Taxi/Minicab.

<sup>19</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/15-conserving-and-enhancing-the-natural-environment>

<sup>20</sup> <http://publications.naturalengland.org.uk/publication/30021>

<sup>21</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/17-facilitating-the-sustainable-use-of-minerals>

<sup>22</sup> <https://www.theguardian.com/cities/ng-interactive/2019/jan/30/high-street-crisis-town-centres-lose-8-of-shops-in-five-years>

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- <sup>23</sup> CPRE recently published research undertaken independently with the Organic Research Centre [www.cpre.org.uk/ORC21](http://www.cpre.org.uk/ORC21)
- <sup>24</sup> <https://policy.friendsoftheearth.uk/publications/transforming-public-transport>
- <sup>25</sup> <https://policy.friendsoftheearth.uk/insight/opportunity-costs-hs2>
- <sup>26</sup> <https://tfgm.com/our-five-year-transport-delivery-plan>
- <sup>27</sup> <https://www.businessgrowthhub.com/green-technologies-and-services/green-intelligence/resource-library/greater-manchester-becomes-uk-s-first-breathelife-region>
- <sup>28</sup> <https://policy.friendsoftheearth.uk/insight/net-gain-new-threat-nature>
- <sup>29</sup> 124 (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>
- <sup>30</sup> <https://www.gov.uk/guidance/national-planning-policy-framework/6-building-a-strong-competitive-economy>
- <sup>31</sup> <https://www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus>
- <sup>32</sup> ITV News 23rd March 2018. <https://www.itv.com/news/granada/update/2018-03-23/major-scheme-to-tackle-greater-manchesters-congestion-problem/>
- <sup>33</sup> <https://democracy.greatermanchester-ca.gov.uk/documents/s3941/5%208%20November%20GMC%20minutes.pdf>
- <sup>34</sup> <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>
- <sup>35</sup> <http://www.legislation.gov.uk/ukxi/1997/1160/schedule/1/made>
- <sup>36</sup> <https://policy.friendsoftheearth.uk/publications/net-gain-new-threat-nature>