

Response to the 2019 draft Greater Manchester Spatial Framework (The Greater Manchester Plan for Homes, Jobs and the Environment)

(Individual identity questions have been redacted and the content of uploaded files pasted into the response)

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Submitted to **The Greater Manchester Plan for Homes, Jobs and the Environment**

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1 If you're submitting a response on behalf of an organisation or group, please also give us their details

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1. Introduction

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

Mostly agree

6 Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

Mostly agree

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

Agree

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

Agree

9 Is the approach that we have outlined in the plan reasonable?

Mostly disagree

What is the reason for your answer?:

Our principal reasons are as follows. More detail to support our points will follow under specific topic questions.

- 1) As a prospective strategic plan for Greater Manchester the draft GMSF begins from the wrong premises. In the publicity for the consultation, the question is posed: "What kind of place do you want Greater Manchester to be?". It is a good question but not one that is answered by the document which is dominated by the economic perspective. Instead we propose that the plan starts from consideration of "retro-fitting" the city region* as a network of localities that are relatively self sufficient (cf. the "20 minute neighbourhood" concept developed in Portland and adopted by Melbourne**). This would imply a highly polycentric conurbation, where citizens' needs are mostly met locally, reducing travel and resource use, increasing local community ties and social capital, supporting local business and community enterprise, and protecting the natural world. Building on the new emphasis on town centres, the strategy would strengthen district centres throughout the region, putting most development there, utilising sites within the urban area, and making best use of existing buildings. The construction of "growth hubs" that pull people and resources into themselves would be resisted in favour of strategies for local community wealth building and plugging the leaks by which wealth and money leaches out of both the local community and the city region. Economic growth would not be sought in the aggregate although some parts of the economy would grow, just as others would shrink, so helping Greater Manchester to minimise its ecological footprint while improving population well-being.
- 2) Economic growth projections are inflated. The consultancy used by GMCA, Oxford Economics, routinely makes forecasts at the upper level of the class of UK economic forecasters, as evidenced in their own paper on their GM Forecasting Model.
So:
GMFM 2018 baseline cumulative GVA growth 2017-2023 = 12.38%
AGS 2018 scenario cumulative GVA growth 2017-2023 = 13.93%
OBR forecast, (UK economy) applied to GM 2017 actual: 2017-23 =9.13%
AGS forecast 2017-2038 is a 59% increase in the scale of the economy. This endless growth is not sustainable on a finite planet, nor in a Greater Manchester that aspires to be one of Europe's greenest cities.
- 3) Housing need projections are based (apparently at government behest) on outdated population figures (2014 rather than the latest, 2016 figures that take brexit into account).
The Housing Minister, Kit Malthouse MP, stated in a Westminster debate on 22 February 2019 and reiterated in a letter to Jim McMahon MP, that the housing need target is not mandatory and an inspector would accept a lower number if there are constraints such as Green Belt. We do appreciate that the guidance from central government has been unhelpfully contradictory but propose that this means that it is inappropriate to attempt to plan for a 20 year period in these circumstances, given that a 20 year plan is not required by central government.
- 4) The plan is not sufficiently explicit about the green space that will be lost, only quoting net Green Belt loss in its main document.
We provide the full figures in our response to question 56.
- 5) Identifying so much Green Belt allocation over a 20 year period is unreasonable, given the uncertainties: the danger is that once identified for building it will be difficult to reverse the allocations should building not be required.
We recommend a 15 year horizon for the revised GMSF. Since there is sufficient land supply for this period this will be a win-win resolution. The plan can always be rolled forward with revisions as trends, needs and supply become clearer.
- 6) There is no analysis of the carbon consequences (baseline and opportunity cost) of building on green land, nor of the preferred "Accelerated Growth Scenario".
We have made some estimates based on our own calculations and present these later on, but this should have been part of the integrated assessment or the supporting papers.
- 7) There is only token reference to food production.
Destruction of farmland for housing and commercial development increases reliance on imported food and destroys farming livelihoods. Leaving the EU, from where much of our food is imported, together with the looming threats of climate change and geopolitical supply chain shocks, mean that this is not a good time to increase our reliance on imported food by building on farmland.
- 8) There is insufficient attention to housing types, in terms of design, mix, tenure.
- 9) Carbon reduction and biodiversity still appear largely as after-thoughts – these sections are vaguer, more tentative than the "we will" language used for proposals such as roads, green belt allocations, and major industrial developments.

* <https://steadystatemanchester.net/2017/03/07/greater-manchester-towards-a-retrofit-garden-city/>

<https://steadystatemanchester.net/2018/05/22/we-need-a-a-social-ecological-spatial-framework/>

** <https://www.eugene-or.gov/1216/What-is-a-20-Minute-Neighborhood>

<https://www.portlandonline.com/portlandplan/index.cfm?a=288098&c=52256>

<https://www.planmelbourne.vic.gov.au/current-projects/20-minute-neighbourhoods>

1. Context

5 Do you have any comments about the context of this plan?

Context comments:

- 1) Population increase cited IS consistent with the latest ONS figures but household increase elsewhere isn't.
Projections are for expected occupancy levels of less than 2 people per dwelling (1.28 compared to 1.3 for GMSF 2016). Even given demographic trends this seems unreasonable. Such occupancy levels imply a pattern of settlement that would be far from convivial and also very resource intensive . Occupancy levels of less than two people per house are probably a luxury that society and the environment cannot afford.

2) The draft GMSF states, " Around two-thirds of the population growth is expected to be in those aged 65 and over, and about 40% will be aged 75 and over."
Given this very high projected elderly population, what are the housing models being proposed? What levels of dependency are forecast for this population? What does this imply in terms of residential space / occupancy levels?

3) The draft GMSF states, at Para 2.5 p 20-21: "The baseline economic forecast foresees an increase of around 110,000 jobs by 2037, with similar changes in the sectoral mix to the recent past, although a more ambitious accelerated growth scenario estimates an increase of about 180,000 jobs."

It is not clear whether this takes account of automation, both in warehouse/logistics employment and also in routine office work.

As noted above, both the GM Forecasting model baseline and accelerated growth forecasts are well above the median of other economic forecasters, including the OBR. The presentation of this model by Oxford Economics does not meet acceptable scientific standards in that confidence estimates are not presented nor is the exact methodology utilised. Moreover the methodology for deriving employment figures, by sector from these forecasts is not provided, making assessment difficult.

Remind them 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 for both local and global equity.

Steady State Manchester calculates that a 2.5% annual GVA growth rate will cause additional greenhouse gas emissions of between +2,609 and +5,645 kilotonnes CO₂. That's between 3.89 and 8.43 % of the Tyndall Centre recommended GM Carbon Budget of 67 megatonnes. These calculations made the rather generous assumption that new economic activity (the growth element) is only 50% as carbon intense as 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 (for the higher figures) at the legislated rate of the UK economy (20% of the carbon intensity of 1990 by 2050). It is possible that the real impact will be somewhere between the two figures since imported goods and services will continue to be more carbon intense than the ambitious GM figure and multiplier effects mean that additional impacts are not restricted to the (hoped for) relatively lower carbon GM economy. It was not a difficult exercise to make these calculations so we are surprised that no attempt appears to have been made to do this by GMCA. This suggests a rather cavalier attitude (at worst negligent) to risk assessment.

4) The draft GMSF, para 2.9, states:

"The Core Growth Area offers the conditions to boost the role of Greater Manchester as a Global City. It is the home of many global businesses and continues to attract high profile companies seeking to invest. Conditions for growth are in place, with high rates of productivity, innovation and global competitiveness."

The strategy of global competitiveness is flawed – a zero-sum gain that we can't all win. Seeking inward investment is a 'two-edged sword' – investors only invest to seek the extraction of profit. It would be appropriate to conduct an options appraisal for alternative economic models, identifying a) the appropriate scale of the GM economy, consistent with the Planetary Boundaries / Paris agreement, b) the prospects for community wealth building maximising the use of local assets rather than the reliance on inward investment.

5 para 2.12 p. 22 [24]

" In 2018 Manchester Airport saw over 28 million passengers use the airport for the first time ever. However, as the only airport in the UK other than Heathrow with two full length runways it has enormous growth capacity, with the potential to accommodate 55 million passengers annually by 2040."

This highly irresponsible proposed doubling of passenger numbers, even with the modest projected increases in aircraft efficiency, will contribute to ecological and climate disaster. It is incompatible with GM's Carbon Budget which is predicated on zero growth in UK aviation & shipping emissions to 2030, followed by a reduction to zero by 2075, in that, such increases will mean that the GM carbon budget has to be revised downwards. It locks the city region into economic dependency on aviation, and the evidence is, that like High Speed Rail, it will serve at least as much as a drain on prosperity as a supplier of it.

In the absence of a scientific and engineering miracle that radically de-carbonised aviation, expansion of the airport is completely unsustainable. Are we going for "growth at any price" in GMSF? This will do much more harm than good in the long term.

6. Draft GMSF Para 2.13: p 22 [24] states:

"Excellent international freight connections will also support Greater Manchester's global role, enabling the large-scale import and export of goods and components. The Manchester Ship Canal provides a direct shipping route from Greater Manchester to the Port of Liverpool, where post-Panamax facilities can accommodate the largest container vessels from around the world. Port Salford will provide an integrated tri-modal facility on the ship canal, with excellent rail and road links, enabling the whole of Greater Manchester to benefit from easy port access. This will be complemented by maintaining and enhancing freight connections to other major ports by rail and motorway, including the Humber ports, Felixstowe, London Gateway and Southampton."

Comment: This means that unprecedented quantities of goods will be shipped directly into the heart of the city region and then distributed onwards by rail and road. Greater Manchester will be blighted by road freight for decades to come. Even if freight transport is successfully converted to low/zero emissions technology, this economic model condemns the people of Greater Manchester to congestion, noise and the sundering of communities by high volume roads. Para 2.17 and 2.18 have more of this flawed thinking.

It is deeply disappointing to see a "Plan for Homes, Jobs and the Environment" relying so transporting freight on roads and motorways, a fundamentally an unsustainable solution with extremely negative impacts on human health, happiness and prosperity, and on the climate.

Draft GMSF Para 2.2 pp. 24-5 [26-7] states,

"The proposed HS2 high-speed rail connections will reduce journey times to London to 67 minutes from the City Centre and just over an hour from Manchester Airport. They would also bring the major regional city of Birmingham within 41 minutes by train. These enhanced connections will help to deliver a more integrated national economy, opening up much greater business opportunities to support UK growth. The timely delivery of HS2 will have major benefits for the Country as a whole as well as for Greater Manchester."

Comment: It is highly inappropriate for the GMSF to merely reproduce government / HS2 propaganda. The evidence on the economic benefits of HSR / HS2 is contested with empirical studies of its impacts on non-dominant cities indicating that the dominant city (London in this case) benefit at the expense of the non-dominant city (see for example, <http://www.publications.parliament.uk/pa/cm201012/cmselect/cmtran/writetv/rail/m14.htm>). Furthermore, the construction of this railway will cause significant loss to ancient woodlands, biodiversity and habitat loss. We would have expected a more balanced assessment of the potential impacts and also an indication that alternative rail investment plans (e.g. improvements to the WCML to resolve pinch points) would be more cost effective.

Tired assumptions of agglomeration economics underpin most of this section e.g. para 2.25.

Draft GMSF paras 2.32 and 2.33 p 32 [34] state: "2.32

Key challenges for the GMSF

"2.33 In light of these issues, the GMSF will need to:

- " - Deliver high levels of economic growth to support the prosperity of Greater Manchester, whilst ensuring that all parts of Greater Manchester and all residents share in the benefits;
- " - Deliver the highest possible quality of life for all residents, and address existing problems such as health disparities and air quality that currently detract from it;"

Our comments on economic growth made above (Question 10) apply here. It is worth additionally pointing out that,

- 1) High levels of economic growth will not (necessarily) deliver prosperity to GM residents. There are winners and losers from economic growth, as we have seen in the last 3 decades. Why should we expect it to be different from now, when the same growthist and agglomeration model is being pursued?
- 2) There is an inherent contradiction between the first and the second of the bullet points in para 2.33.

We made similar points in response to the 2016 draft GMSF consultation and can see little or no sign that they have been taken into account.

The overall context also needs noting: the skewed "playing field". City-based speculation offers a sink for underutilised capital. Powerful, moneyed interests form a strong lobby with budgets several orders of magnitude greater than our modest resources as civil society organisations and citizens. Practically that places the agenda of private developers above the aim of building a Greater Manchester of sustainable and affordable homes and communities. From a human point of view it will not lead to a Greater Manchester of sustainable and affordable homes and communities. It is for this reason that we need a strong Spatial Framework that is not beholden to developer interests. The 2019 draft is an improvement but the playing field is still far from level.

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3. Our Vision

5 Our strategic objectives

Mostly agree

What is the reason for your answer?:

Objective 1

The GM definition of affordable housing should equal or exceed the draft Manchester one.

We endorse the idea of a diverse mix of housing but ask what you actually mean by this and how it is to be realised, especially when developers largely provide a standard model and sell homes off those plans. What will be the process for negotiating and developing a more innovative mix? Please give some examples of what such a diverse mix might include.

Objective 2

We broadly endorse the "brownfield first" policy but note that some brownfield sites should not be built on as they have returned to nature and are valued spaces for biodiversity and/or amenity.

There therefore needs to be a policy for assessing former brownfield sites.

We do note the absence of an effective, robust policy or powers at local, regional or national level, that could enforce brownfield first (or preference. When Green Belt land is released it loses its protection as soon as the plan is adopted. Developers understandably prefer greenfield sites and could win at appeal if refused planning permission.

GMCA needs to lobby this and future Government to produce policy that can mandate brownfield first.

Please provide details about the financing of brownfield restoration (e.g. decontamination).

Re flooding, we suggest that some homes will actually need moving from flood risk areas. and this has implications for the Framework. We would note that this could imply additional pressure for development elsewhere.

A Plan for this duration should also identify the likelihood, in the medium term, of the need to accommodate climate refugees – from within UK (coastal areas), Southern Europe and beyond.

Objective 3

We are concerned at the lack of mention here of green sectors of the economy – already an important component. Its omission does suggest that their sustainability thinking is not joined up. There is, some mention in the more detailed later section on economic growth / prosperity, but its omission here suggests a lower level of priority which is worrying.

Objective 4

We strongly oppose further growth of the airport area which has already taken significant chunks of green belt.

We ask how the concentration of growth in the core growth area and the airport is consistent with the need to regenerate the post-industrial wastelands of the North West, North and North Eastern horseshoe.

We are encouraged by the identification of the needs of the neglected towns and would strongly recommend that this approach is extended to the region's many struggling district centres.

We argue that the need is for more self sufficient districts within the conurbation in terms of more of people's housing, employment, shopping and amenity needs being met in their own area, so cutting down on unnecessary travel. We propose this in opposition to the GMSF's emphasis on certain "growth areas". This relates to the "What Kind of Place do we want GM to be" on the GMSF consultation posters – the answer is hardly posed or answered in the GMSF draft and consultation.

Objective 5 (Reduce inequalities and improve prosperity.)

Very nice – how? - not by the failed agglomeration / trickle down economics that still underpins this draft Framework.

Objective 6

We would support the focus on sustainable transport and freight and encouraging active travel.

Objective 7

You propose to "Promote carbon neutrality of new development by 2028". WHY WAIT til 2028? This really is an abrogation of responsibility. We'd end up building half the new buildings and then have to retrofit them to ensure carbon neutrality. It makes no sense.

Better buses through re-regulation.

Shift a much bigger investment from roads to walking and cycling.

Re-localise within the conurbation to reduce travel (same point as per Obj 6)

Reduce car dependency and aeroplane dependency!

Objective 8

Yes, of course we support this objective but then why build on 20 sq miles of green space? GMCA needs to show it is serious about protecting green space.

3. Our Strategy

5 Our spatial strategy

Mostly disagree

What is the reason for your answer?:

While the draft GMSF aims for efficient use of land resources, the definition of "efficient" is narrowly economic, as evidenced by the schematic map (fig 4.1) with its memes of productivity and growth. There is not sufficient recognition of the quality of the natural environment and the key green areas that connect the urban core with the rural hinterland of our bio-region (the city region plus its rural hinterland).

1) The strategy envisages unsustainable levels of economic (GVA) growth – a 59% increase in the size of the economy. This is inconsistent with the statement in para 4.9 that "The rate of expansion experienced by Greater Manchester over the last 150 years cannot be continued indefinitely." The sense of this statement in the document is that it applies to spatial expansion, but actually it applies to all expansion, simply because such expansion of the economy is inseparable from the expansion of material flows – from the mines, quarries forests, croplands, oceans and rivers, through the shipping and aviation pathways, via the factories and warehouses, to the environmental sinks in land, water and air for the waste products of all this production-distribution-consumption. The UK's ecological footprint already exceeds the available biocapacity of the planet by a factor of 2.85. The priority is to reduce this, not expand it. ref_ <http://data.footprintnetwork.org/#/countryTrends?cn=229&type=earth>

2) We broadly agree with the strategy of densification of settlement to reduce the take of green space and reduce travel emissions. However we do question the specifics of this and note that evidence on the sustainability outcomes of densification is actually mixed, see Waters, J. (2016). Accessible Cities: from urban density to multidimensional accessibility. In D. Simon (Ed.), Rethinking sustainable cities: accessible, green and fair. Retrieved from <https://oapen.org/download?type=document&docid=613676>

There is a big emphasis on the "core growth area" which means many more high rise buildings dependent on high embodied carbon in steel and concrete (as well as the pollution/emission consequences of all the transportation of these materials). The quality of environment that will result will be questionable – poor liveability and walkability with a teeming population in small apartments (the overall occupancy ratio for the whole GMSF new housing is 1.28 – that's an enormous concentration of single person units). That is occupancy levels of less than 2 people per dwelling. Is that a sustainable situation given population growth and climate change? For less impact on the environment would it be better to encourage more sharing of accommodation, multiple occupancy and extended families living in the same house. Mean occupancy levels of less than two people per house are probably a luxury that society and the environment cannot afford.

What about the "missing middle" - the medium rise development that UK cities lack but is common in cities, for example in continental Europe. How does this relate to the town centres, and also the smaller and often neglected district centres.

Is densification what we actually need in a world of looming climate and other shocks, for example to our food supply chains?

We suggest an options appraisal of other models of urban settlement, for example with increased dispersion (including tentatively even into the green belt) for a ruralised and multi-focal city-eco-region., or a "retrofitted city region":

<https://steadystatemanchester.net/2018/05/22/we-need-a-a-social-ecological-spatial-framework/>

Para 4.14 "However, even with increasing densities and the reuse of brownfield land, the scale and distribution of development required to meet the needs of Greater Manchester will necessitate some development of land removed from the Green Belt."

Given that this is a result of the inflated economic growth and housing need figures, this is questionable, as A Burnham has publicly acknowledged, at least in relation to the latter. Recent ministerial statements suggest scope for GMHA to propose an alternative interpretation of the housing need figures.

5 Core Growth Area

Mostly disagree

What is the reason for your answer?:

There is a big emphasis on the "core growth area" which means many more high rise buildings dependent on high embodied carbon in steel and concrete. The quality of environment that will result will be questionable – poor liveability and walkability with a teeming population in small apartments (the overall occupancy ratio for the whole GMSF new housing is 1.28 – that's an enormous concentration of single person units).

As Greater Manchester Housing Action noted in their response to the 2016 draft:

"The growth of single person households is a worrying trend which speaks of the increasing fragmentation of society and the growing isolation of individuals from the communities in which they live. In the long run, this will lead to communities that are less resilient and a broad demographic of individuals who feel no attachment to the place they live in. Such a pattern represents an undesirable future for community life in the region. There is also research evidence that living alone can have negative impacts upon physical and mental health."

6 City Centre

Neither agree nor disagree

What is the reason for your answer?:

We do question to what extent the city centre should be the principal magnet for the rest of the region. Rather than reinforcing the lopsided nature of the city region, building more offices and flats, shouldn't more emphasis be placed on the surrounding districts?

We question where the figure for office space comes from: current occupancy rates for new build disguise the impact of short term incentives ("loss leaders") for occupation. Isn't there a risk of ending up with a lot of under-utilised office accommodation, especially as technological change reduces the admin workforce. We suggest that this is speculative "build and they will come" policy rather than evidence-based planning.

What's the space for small and community-led businesses in this area.

7 The Quays

Mostly agree

What is the reason for your answer?:

High environmental quality? On a recent visit it actually it looked pretty tatty with heaps of rubbish in the waterways. What's the space for small and community-led businesses in this area.

We do support major improvements in walking, cycling and public transport access.

8 Port Salford

Mostly disagree

What is the reason for your answer?:

This development will add considerably to road traffic in the region, and involves loss of green belt (peatland). See fig 4.5 p 53 [55]

There appears to be a bit of fantasy economics again here: the new shipping berths would seem unlikely to be post-Pamamax berths (unless the ship canal is of sufficient dimensions for these mega-vessels, so it relies on goods being trans-shipped onto smaller vessels at Liverpool container port. How likely is this? More likely is that it will go straight onto road and rail.

We would also like to see appraisal of the pollution risks from increased commercial shipping: ships tend to have particularly poor emissions and this could conflict with the GM Clean Air Plan.

9 Inner Areas

Mostly agree

What is the reason for your answer?:

It looks like the idea is to convert these areas into residential areas for the inner core areas.

We support the aims of "sustained neighbourhood regeneration" and the statement that "it will be essential that the network of open spaces and other green infrastructure is improved".

There is mention of the existing population and we would want to emphasise their needs in the face of what will inevitably be a kind of gentrification. Clearly these areas need considerable attention to improve them, and this must be done carefully in order to avoid the mistakes of previous regeneration - e.g. "social cleansing".

There is no mention of local district centres, nor the "missing middle" we mentioned above.

10 Northern Areas

Neither agree nor disagree

What is the reason for your answer?:

We have some reservations about the idea of attracting enclaves of high income people. We accept the point that adding higher income citizens will help the local economies but oppose the idea of "high income enclaves". Councils should be aiming for a broad social mix across their territories, not encouraging such "rich ghettos".

We do support the emphasis on regenerating the towns but the devil is in the detail. What kind of development, for what?

11M62 North-East Corridor

Disagree

What is the reason for your answer?:

We question the scale of development envisaged and the large encroachment on green space.

It is unclear how many jobs would be delivered by all this building. The nature of the employment is vague, but although there is mention of advanced manufacturing, it seems likely that much of it will, given its proximity to the motorway system, actually be large warehousing / logistics - sectors that are low wage, precarious (especially given increasing automation) and linked to unsustainable importation / transport of commodities. This will have implications for air quality - motorways are a problematic source of air pollution - and carbon emissions prior to eventual decarbonisation decades hence.

We should welcome improvements in rail and other public transport but not insofar as they rely on this scale of building.

We question the allocation of large tracts of green space to the creation of industrial parks since the case has not been made for a shortage of brownfield, former industrial land for these purposes. The study commissioned by CPRE suggests that projections for brownfield availability have not taken natural turnover of sites into consideration (more sites will become available over the time-scale of the GMSF). Fig 11.1 only identifies a few small areas of industrial land supply that is non Green Belt which leads to the suspicion that the identification has not been adequate. Anyone travelling around the conurbation is aware of huge tracts of former industrial land. The industrial land supply spreadsheet at https://www.greatermanchester-ca.gov.uk/media/1801/2018_jw_land.xlsx does give a list of identified non GreenBelt sites but it is difficult to interpret since although it identifies the floorspace to be delivered, it does not state the area of the parcels of land concerned (in ha.). It is therefore not possible to draw a conclusion about the utilisation of this land. The documentation is too voluminous for a lay person to digest intelligently and then to assess the claims made in the GMSF draft. This contrasts with the large resources the commercial sector has at its disposal for responding to the consultation.

According to the Employment topic paper, 60% of site area is on brownfield sites. see_

<https://www.greatermanchester-ca.gov.uk/media/1743/employment-topic-paper-w-cover-web.pdf> para 7.3.2

Hidden from the main GMSF paper, but apparent in the Employment topic paper (see table 12), is the fact that in Rochdale, for non-green belt land supply, nearly 10 times as much greenfield space has been identified as brownfield space (for the conurbation as a whole the ratio is roughly 2:1 brownfield to greenfield). Given Rochdale's post-industrial landscape, this looks highly suspicious, making highly contentious the proposal to allocate additional large swathes of green belt to add to the building on green space.

Anecdotally, Kingsway Industrial Estate (which GMSF wants to expand into greenfields) is not running at full occupancy.

Also, no thought has been given to the fact that many warehouse / logistics jobs will be redundant within say 20 years as robotics takes over this type of role so these developments are unlikely to create the number of jobs forecast, even if the inflated economic growth projection used in the draft GMSF were credible.

12Wigan-Bolton Growth Corridor

Neither agree nor disagree

What is the reason for your answer?:

As elsewhere we'd want to question the language of "growth" as main way this is all framed - rather we want to know what kind of a Bolton-Wigan is desirable and what will that mean for local people?

We are concerned about the ribbon development of warehousing along the motorway corridors in recent years and would want effective safeguards to prevent the any more of this.

We support the increased use of the Atherton rail line and extension of bus rapid transit.

It is entirely inappropriate for the draft GMSF to endorse the Ryder Cup proposal: this will mitigate against local residents and representation to the public inquiry regarding this encroachment. Greater Manchester is already over-provided with golf courses which are effectively unproductive, resource-hungry green deserts.

The proposed development at Hulton Park is inappropriate and we endorse the CPRE's comments on this.

13Southern Areas

Disagree

What is the reason for your answer?:

We most emphatically do not agree with expansion of the airport, nor with the further building on green belt to build sheds for goods distribution - much of it probably brought in by air freight and also by road.

We note the contradiction between "maximising the economic potential of, and benefits of investment in, Manchester Airport and associated transport infrastructure" and "neighbourhood quality and environmental attractiveness of the southern areas will be protected and enhanced."

14Manchester Airport

Disagree

What is the reason for your answer?:

We disagree vehemently.

This is ecological illiteracy of the highest degree: proposing a doubling of aviation growth with all the associated emissions from the transport, parking, hotels and warehousing around the airport. The growth of Manchester airport is completely unsustainable and counter to many of the objectives in GMSF including the proposed and very challenging carbon budget for the conurbation (which will have to be reduced if aviation expands).

We also note the noise and air pollution consequences of aviation and the associated traffic. This policy is a proposal for more sprawl, more pollution, more green space encroachment and loss of amenity, liveability and natural ("capital") resources..

Timperley wedge is the last remaining green space between Trafford and Manchester in that area. These spaces in between are important for maintaining the distinctiveness of place.

Allocation 11 is relatively small and does link sensibly with the hospital - but we'd want to question whether the allocation is really necessary to meet the need - have other options been considered?

15 New Carrington

Mostly disagree

What is the reason for your answer?:

A considerable proportion of the Green Belt allocation comprises wildlife corridors and priority habitats. Most of the land is rated as grade 1 or 2 agricultural land.

See Site Selection topic paper and search for Carrington from page 78 (Appendix 3) onwards - detail is split among various separate parcels of land.

We are also concerned about the potential carbon sequestration loss and opportunity cost of the foregone peatland restoration that the green belt allocation would entail.

There may be a case for a smaller development on the formerly industrialised brownfield section. fig

4.9: This map is especially poor.

16 Main town centres

Mostly agree

What is the reason for your answer?:

We support the new emphasis on promoting neglected town centres.

However we do note the contradictions - for example building gigantic people and wealth magnets in the centre, south and north, and building fast transit to the Trafford Centre which sucks the lifeblood out of the town centres and also the smaller district centres.

We are concerned at the lack of consideration for the smaller district centres. The logic of the Mayor's town centre emphasis would be to also promote and enhance the smaller centres. How about a polycentric city region where people can meet their needs for housing, education, employment, provisioning and amenity mostly in their local area? This would help create good places to live, reduce traffic (emissions, costs) and reduce inequalities and deprivation across the region. The document at present has a very limited vision of the kind of Greater Manchester that we might want.

see our: <https://steadystatemanchester.net/2018/05/22/we-need-a-a-social-ecological-spatial-framework/>

17 Strategic green infrastructure

Mostly agree

What is the reason for your answer?:

We support the enhancement of the natural world (jargonised here as "Green Infrastructure"). We would like to see more of this and here we merely note the contradiction with the loss of more than 20 sq miles of green space proposed in the rest of the draft GMSF.

18A sustainable and integrated transport network

Agree

What is the reason for your answer?:

We agree with the broad thrust of this policy.

3. A Sustainable and Resilient Greater Manchester

5 Sustainable development

Agree

What is the reason for your answer?:

We agree with the general thrust of this policy.

However, there needs to be a conversation about how these three goals, economic, social and environmental are weighted. If human survival is threatened by ecosystem destruction, then the environmental goal should be weighted highest (it was different when humans had an ecological footprint much smaller than the planet's available capacity). Without this kind of clarity, this just becomes a vague feel-good statement that means little: trade-offs could be made opportunistically, without clear criteria.

We agree with the brownfield preference with the caveat that some brownfields are of high biodiversity and amenity value having returned to nature.

6 Carbon and energy

Mostly agree

What is the reason for your answer?:

There is a lot to like here, but we note that the levels of development put a strain on all these positive intentions.

A particular problem is delaying net zero buildings til 2028. Do it now - it should have happened by 2015 anyway, nationally but the govt tore up that commitment. We suggest we go further - for example, a systematic programme of retrofit focussing on fuel poor households and bigger emitters, with grants / loans via the envisaged GM low carbon fund. Make it revolving and pump prime it with funding from at least some of GM Pension Fund's current fossil fuel investments add an airport departure tax and voluntary levy on classes of discretionary expenditure (e.g. eating out, hotel stays).

We strongly support

#4: Keeping fossil fuels in the ground (hence the need for the Pension Fund to divest). and

#6: Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting. (but again note the contradiction with 20 sq miles of green space loss).

7 Heat and energy networks

Mostly agree

What is the reason for your answer?:

Agree - as long as it's not powered by fossil fuels, or by imported biomass

8 Resilience

Mostly agree

What is the reason for your answer?:

OK, good but how?

What about more extreme possibilities - severe climate change impacts to supply chains, climate refugee influx, food shortages?

9 Flood risk and the water environment

Agree

What is the reason for your answer?:

We are very happy to support these proposals.

10 Clean air

Agree

What is the reason for your answer?:

We have a legal obligation to meet EU air quality standards in the shortest possible time.

These are sound proposals.

We again note that aspects of the draft GMSF are in contradiction with this aim, particularly road building, the encouragement of HGVs via warehouse and logistics expansion, and airport expansion.

Suggest you add something on peatland fires.

11 Resource efficiency

Mostly agree

What is the reason for your answer?:

Agree but note that economic growth inevitably increases material flows so will threaten these goals.

12 Do you have any comments about a sustainable and resilient Greater Manchester?

Context comments:

It is good to see this section in the draft Framework. However we do note the contradictions and pressures from the aggressive expansionism elsewhere in the document.

supporting info:

No file was uploaded

3. A Prosperous Greater Manchester

5 Supporting long-term economic growth

Disagree

What is the reason for your answer?:

The policy is predicated on the tired old model of maximising GVA growth. While there are some sound proposals within the policy (e.g. retain qualified people locally, maintain economic diversity, expansion of the low carbon economy, health innovation, and potentially the alliance of the knowledge economy and high value manufacturing) the overall model is one of endless and unsustainable expansion. We know that this cannot continue on a finite planet. To promote such levels of GVA growth is therefore reckless.

As stated under Q 13 above:

The strategy envisages unsustainable levels of economic (GVA) growth – a 59% increase in the size of the economy. This is inconsistent with the statement in para 4.9 that “The rate of expansion experienced by Greater Manchester over the last 150 years cannot be continued indefinitely.” The sense of this statement in the document is that it applies to spatial expansion, but actually it applies to all expansion, simply because such expansion of the economy is inseparable from the expansion of material flows – from the mines, quarries forests, plantations, croplands, oceans and rivers, through the shipping, aviation and road pathways, via the factories and warehouses, to the environmental sinks in land, water and air for the waste products of all this production-distribution-consumption. The UK’s ecological footprint already exceeds the available biocapacity of the planet by a factor of 2.85. The priority is to reduce this, not expand it.

In its own terms the aggregate GVA growth level assumed by GMSF (the Accelerated Growth Scenario figure) is unrealistic. This figure is 0.7% p.a. above GMCA’s (GM Forecasting Model) own baseline estimate, itself well above other estimates, including the OBR, and there is no transparency as to how the higher figure has been arrived at beyond an “aspiration” for “accelerated growth”. Indeed for the 2016 GMSF the Accelerated Growth figure was “only” 0.2% above the GMFA baseline estimate. It looks like fantasy has persisted in the face of reality.. The contributions of several civil society organisations (including SSM) that challenged the growth scenarios in the previous consultation draft, have not been included in the consultation document. Fantastic GVA growth figures in the GMSF inexorably lead to unrealistic and speculative plans for building.

Moreover, there is limited evidence that economic growth brings the inclusive prosperity that the Framework aspires to. GDP/GVA growth does not necessarily lead to social well-being. This has been the case in the UK since the mid 1960s after which time levels of life satisfaction have not followed increases in the size of the economy. In the case of Greater Manchester, this is hardly surprising. For example, over the last ten years more than 20% of GVA is accounted for by two sectors, sales (including the motor trade) and real estate (ranking first and third, respectively): these are also the sectors that have shown some of the most the most sustained growth. It is hardly surprising then that GVA growth does not deliver population well-being if significant components are associated with grid-lock and housing cost inflation. Moreover, GDP growth in recent decades has been associated with large increases in inequality.

Over the last 30 years, “growth” has increased inequalities, not diminished them. The chasing of “productivity” is one dimension of this:

Much is made of the lower unit productivity of GM compared to the UK. But increasing productivity means increasing the profitability of business per person employed. That does not mean benefit for employees: it tends to reduce the number of employees per unit of profit. Moreover, the productivity gap is in large part due to the headquartering of firms in the South East, giving a skewed picture.

In relation to manufacturing: a 1.7% growth led to a reduction of 10,000 jobs, but the implications are wider given the increasing automation of all sectors which is exacerbated by continual growth. [For some illustrative data see for example <https://www.coppolacomment.com/2017/09/we-need-to-talk-about-productivity.html>] Rather than trying to maximise productivity, we should probably be looking to decrease it: that is to say, to increase labour intensity - that is vital when GM businesses (and workers) face threats from automation (this is an obvious point in relation to human services such as social care and arguable for other sectors too). It is true that there has been a growth of precarity and low wage jobs, but that is not a result of low productivity. If precarity and low wages are a problem, the answer is to build an economy that includes a more secure future for the lower skilled section of the population - that means using the powers of anchor institutions (including councils) to drive up working conditions and wages, using strategies such as “Local Wealth Building” and investment in the “Foundational Economy”. Resting so much of the economy on freight and logistics does not seem like a good prescription for inclusive prosperity.

The flawed MIER de-emphasised the importance of SMEs - but a sustainable, inclusive strategy needs to have strong policies to encourage them.

The strategy lacks discussion on keeping wealth within the sub-regional economy and this is despite outstanding work by, for example Manchester and Preston councils via their procurement policies favouring local firms which then themselves spend locally.

The old chestnut of the “fiscal gap” is also wheeled out (para 6.7). Why should the gap between tax revenue and government expenditure be a problem? This is a matter of redistribution on a national basis, and includes some of the corporation tax receipts from firms headquartered in the London area, but often with operations here. Just as local leaders are campaigning for reinstatement of local government cuts and for a fair share of transport spending, so they should be campaigning more broadly for the redistribution of national income to the poorer regions.

The continued uncritical appeal to economic growth, competition and productivity is indicative of a limited thinking on economic, ecological and social well-being that pervades much of the Spatial Framework.

6 Employment sites and premises

Mostly disagree

What is the reason for your answer?:

The case has not been made convincingly for allocations from Green Belt.

In the case of manufacturing and warehousing, these amount to 50% of the proposed expansion. This is frankly astonishing given the stated aims of protecting natural environments and focusing development on brownfields.

7 Office development

Neither agree nor disagree

What is the reason for your answer?:

We objections to the additional demand to build on green space in the area of the airport.

We question the projections and the interpretation of figures on office occupancy, especially given incentives for new high-end office accommodation. We note the likely impact of further office automation on lower skilled office jobs.

We note the possibilities of office workers working more remotely, reducing travel demand - for example via the use of locality business hubs, connected digitally to main offices.

There is need for additional office space for small businesses in certain district centres, e.g. Chorlton (according to Chorlton Traders Association).

8 Industry and warehousing development

Mostly disagree

What is the reason for your answer?:

It's hard to see how measures to "significantly increase logistics activity within the sub-region" have the potential to "support environmental objectives by reducing the number of HGV journeys from the ports and distribution parks across England". The opposite would seem to follow.

This passage also suggests the nature of the economic growth we are going to have: consumption-based spending on consumer goods brought from afar and shuttled around the region. Is that "the kind of Greater Manchester that we want?"

para 6.26 states:

"Rising levels of automation and digitisation, increased customisation, greater integration of product services, and demands for more functionally and energy efficient premises are all leading to the need to increase the supply of new high quality floorspace, often with larger floorplates." But this does not follow - in reality the reverse is at least as likely.

It goes on to say "At the same time, there will continue to be a demand for smaller and/or cheaper accommodation to support local businesses and start-ups that may often be working on narrow margins but make an important contribution to the Greater Manchester economy." - and this we do agree with.

Draft GMSF 2019 states at para 6.28:

"6.28 **The GMSF makes provision for an industrial and warehousing supply considerably higher than the overall development requirement**, reflecting the need to compete internationally for investment and provide sufficient choice and flexibility to respond to the varied needs of different businesses...." **our emphasis**

And 6.29: "A range of industry and warehousing development opportunities have been identified by districts through their strategic employment land availability assessments, capable of accommodating around 2,600,000 sq m of floorspace...."

It would help if this could be expressed in hectares of land to be used.

Note again the economic model assumption of global competition for inward investment - investment that is only made to extract profit from GM's people.

International competition is a zero-sum game: if we win then we are crushing other peoples while if we lose we fall behind. Another model is possible.

And 6.30 "The existing supply of potential industrial and warehousing sites identified in the districts' strategic employment land availability assessments are insufficient to meet the overall identified need. Many of the sites they contain are also likely to be attractive primarily to a relatively local market and/or smaller businesses, due to their location, size and surroundings."

If instead we were to plan a more self-sufficient, circular and re-localised economy, then these existing sites are likely to be adequate.

And 6.31 "Table 6.2 'Industry and warehousing land supply 2018-2037' summarises the sources of industry and warehousing land supply up to 2037. Although all of the sites could potentially be developed in full during the plan period. In practice, the high level of land supply, the size of some individual sites and infrastructure requirements mean that some of the Green Belt sites may come forward in part after 2037. This will help to ensure that there is a diverse ..."

Taken together, these passages demonstrate that it is unnecessary, even in the terms of the GMSF 2018-2037 to be taking those sites out of the Green Belt. It is only the attempt to construct a 20 year plan that knows everything that leads to this conclusion.

Added to this the observation that no allowance appears to have been made for the turnover of brownfield sites. That is, the identification of brownfield sites, on which basis the land supply was estimated, is based on a snapshot in time, the stock of brownfield sites as of now. It is necessary to allow for the flow of sites as expanding enterprises move into larger premises and downsizing enterprises move into smaller premises, leave the region or go out of business. Each of these moves makes sites available. Confounding stock and flow is a rather elementary error and we anticipate that it will be corrected, yielding a significantly higher annual supply.

We also note that business does not plan on a 20 year time-scale. It makes far more sense for GMSF to plan in detail for the next 5 years with indicative figures for the two subsequent 5 year periods (a 15 year rather than 20 year time-frame, consistent with the government's housing planning requirements). This would mean the phasing of land and critically that Green Belt need not be allocated for development (and hence unprotected / blighted) until there is robust evidence for it being needed.

We also suggest that the flexibility factor is too high, again leading to inflation of estimated land demand.

9 Do you have any comments about a prosperous Greater Manchester?

Context comments:

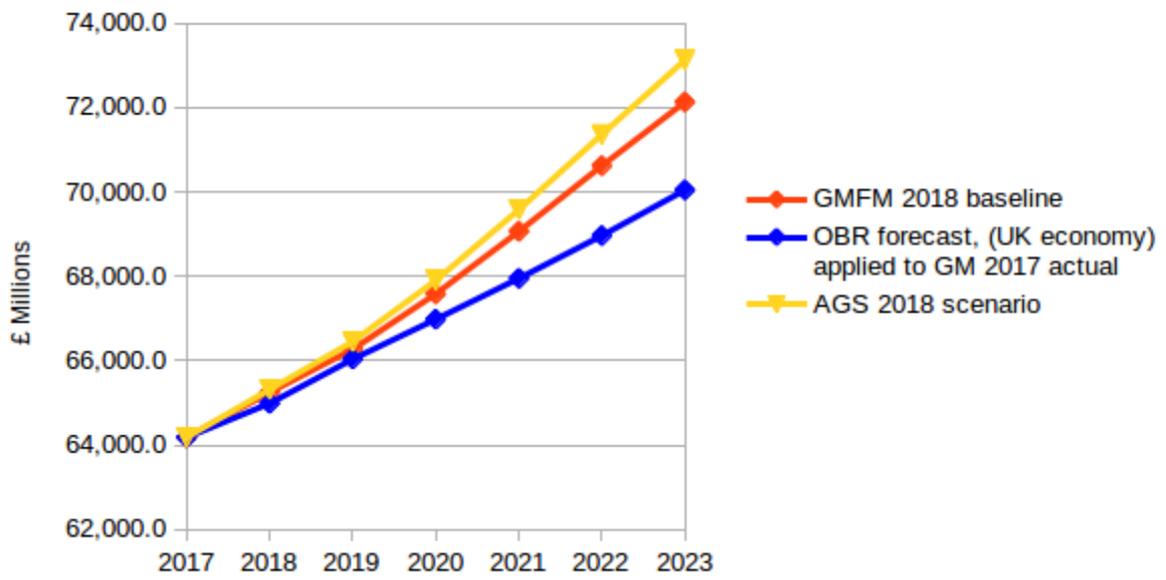
Inflated GVA growth estimates lead to inflated employment estimates and in turn this leads to inflated housing estimates. Medium range uncertainties are not adequately considered.

There is no convincing vision of an economy that supports the kind of just, stable and convivial society that we would want in our region.

supporting info:

GVA 2017 - 2023 GMCA vs OBR.png was uploaded (i.e. the following chart)

GVA comparison of forecasts



3. Homes for Greater Manchester

5 Scale of new housing development

Mostly disagree

What is the reason for your answer?:

We believe that there are grounds for thinking that these numbers are inflated. We acknowledge that many factors influence household formation and for this reason we urge caution in accepting the government imposed methodology to make a 20 year projection and plan. We instead suggest that numbers are considered for the next 5 years in detail and in outline for the two successive 5 year tranches. rolling forward every 2 years.

As noted elsewhere in our response, inflated economic growth projections lead (via inflated employment projections) to inflated housing projections. Were such a scale of housing to actually be built there would be a likely property bubble collapse due to the lack of purchasers and renters to refund a significant portion of the investment. However, in reality that seems unlikely, since this scale of housing will not be delivered when economic reality collides with the inflated forecasts.

We note that even using the housing supply figures presented in the housing topic paper, there is enough land without encroaching on green belt land for 17 years. It is only by using an inappropriately long planning period of 20 years that green belt allocations become relevant. We do accept the need for house building but question the scale proposed. It will be possible to meet government requirements on the pipeline of land supply if a shorter time scale is used for the plan.

We also note uncertainties not mentioned in GMSF in terms of the economy , migration (intra- and inter-national) and patterns of household formation.

We are, of course, aware of the disagreement between GMCA and central government over using outdated ONS population figures. We believe the GMCA and Mayor should stand firm on this matter, demonstrating that it is following para 31 of the NPPF, 2018, that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence" - that is by using the most recent ONS population figures. It should also firmly argue that exceptional circumstances apply given the pressures on green space. The minister's advice in a letter to Jim McMahon MP should be taken at his word: "On Green Belt specifically, I would like to reaffirm that only in exceptional circumstances can a strategic policy-making authority establish the need to alter a Green Belt boundary, using the Plan process of consultation and examination (paragraph 136-137). In fact, the revised National Planning Policy Framework strengthened this policy by saying that local authorities should show fully evidenced justification for a Green Belt boundary change (paragraph 136). I would also advise that the use of the standard method is not mandatory. in exceptional circumstances an alternative approach may be used, provided that the approach also reflects current and future demographic trends and market signals (paragraph 60). "

In summary, the GMCA should use the most recent evidence on population forecasts, downgrade its inflated economic growth estimates, citing, if necessary the exceptional circumstances of the pressures on the green belt to justify an alternative methodology to the government's, and plan for a 15 year period in outline and a five year period in detail.

6 Affordability of new housing

Mostly agree

What is the reason for your answer?:

We are pleased to see the emphasis on affordability and would like to see greater emphasis on homes for affordable rent. We look forward to the forthcoming GM Affordability definition and urge that this be a definition of real affordability.

7 Type, size and design of new housing

Mostly agree

What is the reason for your answer?:

Given the preamble in paras 7.19 to 7.26, it seems surprising that the proposed policy on type, size and design of new housing is really rather vague.

We would like to see innovative thinking on types of housing and how to encourage such a mix. We do not believe a satisfactory range of housing types can be delivered by relying on current market forces and developer preferences which tend to lead to an uninspiring, bland, carbon-copy style of development, with a loss of locality character.

We regard the question of tenure and land ownership as critical and encourage the adoption of models such as housing co-operatives, co-housing, intergenerational housing models, and community land trusts. Opportunities should also be opened for self-build projects, where these are piloting innovative, low carbon and community-building solutions.

Elsewhere (Q. 14) we question the high proportion of single person units envisaged. This is now worse than it was in the 2016 draft.

8 Density of new housing

Mostly agree

What is the reason for your answer?:

While we have some sympathy with the idea of dense settlement to keep sprawl to a minimum, we do not want to encourage building on every scrap of land: it will be important to ensure green spaces near to where people live, for amenity, air quality, beauty, ecosystem "services", and probably urban food production. Evidence on environmental benefits of densification is not altogether clear. See, for example, Waters, J. (2016). Accessible Cities: from urban density to multidimensional accessibility. In D. Simon (Ed.), Rethinking sustainable cities: accessible, green and fair. Retrieved from <https://oapen.org/download?type=document&docid=613676> (open access)

9 Do you have any comments about homes for Greater Manchester?

Context comments:

Comment on Table 7.3 Sources of housing land supply 2018-2037 [Note: the figures appear to be housing units, flats or houses see housing topic paper, tables 16 and 18: the final column of table 18 (below) = final column of the above one minus green belt allocations minus allowances.]

A key point is that , rather than allocating sites for 201k houses the GMSF flexes the numbers to allow for "choice" as well as flexibility and have actually allocated

land for 218k houses see chapter 6, para 6.14 of the Housing Topic paper. Flexibility presumably is to give a safety margin in case sites don't become available - it will be hard to argue with that, but what about "choice"? There will be choice across the entire housing supply - it is hardly going to be constrained so whatever the share of choice+flexibility that is attributable to choice would seem questionable. Unfortunately the housing topic paper is silent on the relative proportions.

The upshot is that more land than necessary is allocated, putting additional pressure on green space.

Land-banking:

On reading the housing topic paper, it does appear that sites with planning permission, and sites with lapsed planning permission ARE included in the land supply. This might suggest that land-banking by developers and others might not be an issue, unless sites are held by developers that have not yet received planning permission and are not known to those compiling the figures in column 4 of table 16, below (other District SHLAA sites) to the Strategic Housing Land Supply Assessment. (table 16 informs table 18). We would welcome clarification as to how the threat of land-banking has been assessed and taken account of.

We also note the potential for speculative land-banking of the sites slated for allocation from the Green Belt, especially given the proposed early designation of such sites which might not become available for years.

A further important point has been made by Kenny Blair, a Stockport independent councillor. He notes that the National Planning Framework does not require a 19 year period for plans. We agree with his argument. It states:

"Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

So the 19 year period is a political choice. As cllr Blair points out, were a 15 year period used, then there would be sufficient land supply without using green belt. Only when an additional 4 years of house completions are added in does the supply run out. Given the enormous uncertainties (reflected in the ONS figures) in planning for such a long time period, it seems to make sense to use the shorter, 15 year period, taking pressure off the green belt, at least for now and actually providing a win-win settlement. See his discussion here:

<https://www.independentcldr.info/home/political-choice-driving-green-built-land-grab-it-doesnt-have-to-be-this-way>

supporting info:

No file was uploaded

3. A Greener Greater Manchester

5 Valuing important landscapes

Agree

What is the reason for your answer?:

We fully endorse the aim of protecting and enhancing the natural assets of our city-region and bioregion.

6 Green infrastructure network

Mostly agree

What is the reason for your answer?:

re para 8.9:

" - Multifunctional, providing multiple eco-system services whilst not detracting from important primary functions;

Comment - what is more important than providing multiple support for the fragile ecosystem? Surely that is a primary function on which all other systems rest. This is all good but there is no sense of an order of priorities here - except to, controversially imply that food production is less important. That implies maybe that our green infrastructure is more important than that elsewhere on the planet.

So, does recreational use, for example have equal rank with carbon sequestration, biodiversity enhancement and climate adaptation? Surely not.

In para 8.10:

reads " The challenge for Greater Manchester is therefore to find a way of accommodating the necessary scale of development to deliver inclusive growth and prosperity, whilst delivering overall improvements to the green infrastructure network."

Somewhere there needs to be a policy on dog and cat control. These strangely favoured species do untold damage to biodiversity, especially through their faeces (especially dogs) and hunting (especially cats). There is evidence of species loss specifically from dogs and cats.

Comment: We suggest rephrasing that: "The challenge for Greater Manchester is to ensure that otherwise desirable economic developments do not and can not damage the fragile fabric of natural systems."

We also suggest a presumption against herbicide use. That would not prevent necessary spraying and weed control but would reduce the casual use of weedkiller where it is not needed, especially throughout the urban environment.

7 River valleys and waterways

Agree

What is the reason for your answer?:

This is good, well thought out, policy.

8 Lowland wetlands and mosslands

Mostly agree

What is the reason for your answer?:

We welcome this policy emphasis.

However we note that there are plans for significant development on at least two areas: Carrington and Chat Moss which is inconsistent with this policy. We are also concerned at the lack of any carbon metrics in the Framework that would enable assessment of the consequences of building on any green space, especially peat and wetlands.

9 Uplands

Agree

What is the reason for your answer?:

We suggest the addition,

- 1) Where powers permit, of a ban on burning of heather.
- 2) In the light of the recent moorland fires to review any other options for fire enhanced prevention.
- 3) Consider the potential economic contribution of upland areas via innovative and ecologically benign options including, woodland and coppice products, high value animal products (e.g. venison, alpaca), moorland berry cropping.

5 Urban green space

Mostly agree

What is the reason for your answer?:

However we propose that the term "in balance with other considerations" be removed since it would appear that a hierarchy has been established where development takes precedence over green space conservation.

1878 hectares of non-green belt have been identified as part of the land supply in the supporting papers. This compares with the net Green Belt loss of 2419 ha and gross green belt loss of 3379 ha.

6 Trees and woodland

Mostly agree

What is the reason for your answer?:

We support the aim of increasing tree cover, except in habitats such as semi-natural grasslands and peat bog, where it could displace other ecosystems and species, though there, selective, ecologically informed, plantings can be appropriate.

Only 1 tree per resident over 25 years looks pitifully small.

Replacing a mature tree with two trees is likely too small a commitment. Eventually this would replace the tree and its active carbon sequestration and embodied carbon, plus its other functions but it will take time. Where does the figure come from - are there metrics to support it?

Community orchards are all well and good but really require a coherent stewardship plan - if left to "the community" without resources and expertise, they fall into neglect. Better to actually encourage commercial (including social businesses / mutuals / co-ops) to establish urban orchards, integrated with poultry runs and other cropping (salads and flowers work well).

The policy needs connecting with policies on timber use in building.

Securing a diversification of broadleaved species, in order to increase biodiversity and disease resilience; That's OK but it would be good to see more on species and cultivar selection. Consider speed of growth, biodiversity support, co-benefits and phasing (e.g. fast growing species sheltering slow growing species as they get established), canopy and water demand, wind resilience in exposed locations, and multiple uses - obtain a yield where possible.

7 Green infrastructure opportunity areas

Agree

What is the reason for your answer?:

8 Standards for a Greener Greater Manchester

Mostly agree

What is the reason for your answer?:

We are uneasy about the concept of developments “delivering overall net gains in green infrastructure value to the benefit of local communities even if the quantity in that particular location may reduce”? How is the value measured?

9 A Net Enhancement of Biodiversity and Geodiversity

Mostly agree

What is the reason for your answer?:

This is good, so far as it goes but we call for each development to deliver a net enhancement of biodiversity, not just the overall plan. This will be much easier to measure and makes it easier to apply the policy which otherwise could suffer from imprecision, inappropriate and poorly quantified trade-offs, and time lags.

10The Greater Manchester Green Belt

Disagree

What is the reason for your answer?:

The table and chart in the attached document give the actual green land loss. It is 5257.6 ha or 20.3 sq miles taking into account the gross green belt loss (net loss plus redesignation of existing green land as green belt) and green fields proposals that are not from the green belt (from the three topic papers on housing, offices and industry/warehousing). This is too much, and such a large allocation all at once is not appropriate for a 20 year (or even our recommended 15 yr) planning period since it will remove protection from sites that may not be required. It also reduces the pressure to use brownfields first.

There is no target for brownfield use, despite the precedent set by the former North West Regional Spatial Strategy which had high targets that councils were successfully achieving. An, backed by performance monitoring would help to restrict greenfield allocations and help to realise the brownfield first preference.

Given the stated brownfield first presumption, we are surprised and alarmed that in the case of Manufacturing and Warehousing, only 50% is to be on brownfield land.

Finally we note again that the 20 year time scale of the GMSF unnecessarily inflates the need for green land usage.

11Do you have any comments about a greener Greater Manchester?

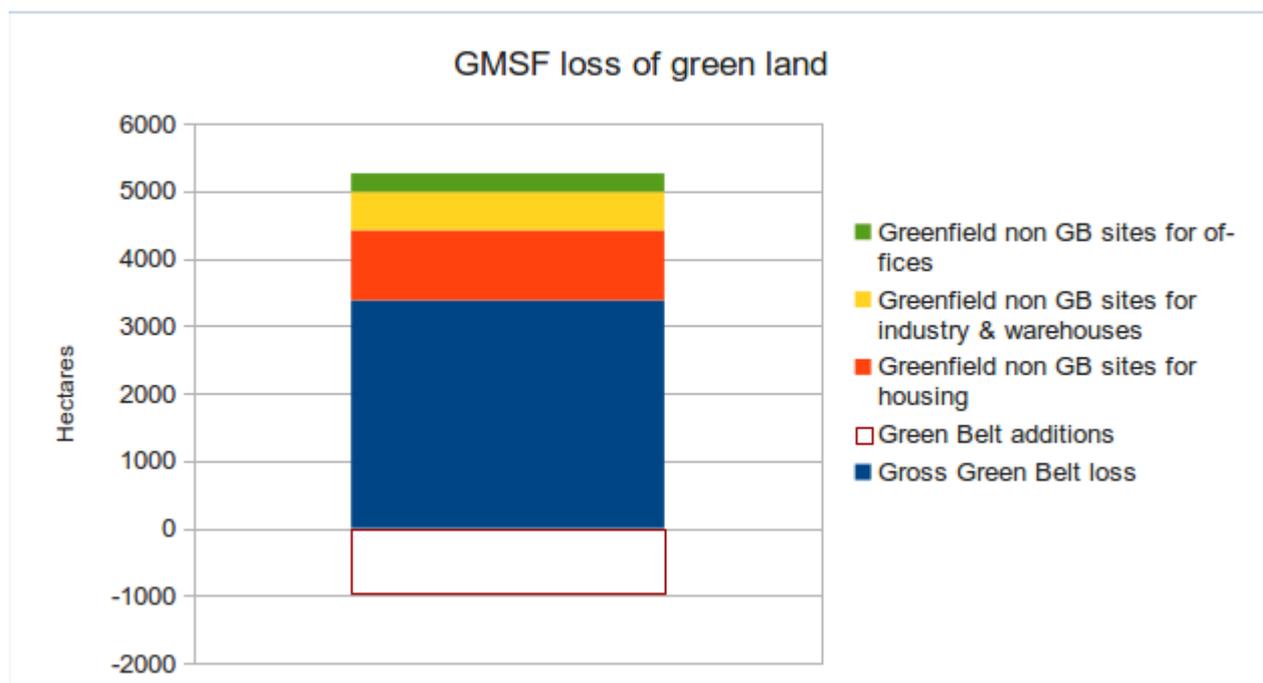
Context comments: supporting

info:

Loss of green land in the 2019 draft GMSF.doc was uploaded (inserted below)

Loss of green land in the 2019 draft GMSF

	ha	sq m
Green Belt net loss	2419	9.34
Green Belt additions	960.5	3.7
Gross Green Belt loss	3379.5	13.04
Greenfield non GB sites for housing	1037.7	4.0
Greenfield non GB sites for industry & warehouses	567.51	2.2
Greenfield non GB sites for offices	272.93	1.1
Total non GB Green Space loss	1878.14	7.3
Total Green land loss	5257.64	20.3



Steady State Manchester
February, 2019

3. A Greater Manchester for Everyone

5 Sustainable places

Mostly agree

What is the reason for your answer?:

But much of the rest of the draft GMSF is contrary to these goals - particularly the encroachments on green spaces and the concentration of economic activity in a limited number of locations. The policy would be better met via a more polycentric model, where citizens can meet the majority of their needs within their locality, venturing further less frequently.

6 Heritage

Mostly agree

What is the reason for your answer?:

Agree but on the evidence so far, particularly in the city centre, we have yet to be convinced that you are serious about this.

7 New retail and leisure uses in town centres

Mostly agree

What is the reason for your answer?:

Omissions from the policy are

- 1) How to curb the impact of out of town shopping complexes - principally the Trafford Centre. You mention the impact of Internet shopping (which may not be a major cause, according to research from IPM at MMU - ref below) but it is the Trafford Centre that has ripped the heart out of our local centres, making stores unviable. Proactive policies, including business rate subsidies for small local retailers, will be vital.
- 2) There is no mention of the necessary levels C and D. C refers to the smaller District Centres, listed in a footnote one of the supporting documents. These are a vital resource for vibrant and local place-making. D refers to the even more local and also threatened resource of corner shops, small parades of shops and also non retail-based resources.

See <http://placemanagement.org/news/web-shoppers-are-not-killing-the-high-street-reports-esrc/>

5 Education, skills and knowledge

Neither agree nor disagree

What is the reason for your answer?:

Don't agree with further expansion of the University sector which is now over-extended.

6 Health

Mostly agree

What is the reason for your answer?:

7 Sport and recreation

Mostly agree

What is the reason for your answer?:

8 Do you have any comments about a Greater Manchester for everyone?

Context comments:

supporting info:

No file was uploaded

3. A Connected Greater Manchester

5 World-class connectivity

Agree

What is the reason for your answer?:

We agree but note the contradiction between reducing the need to travel and enhancement of connectivity as well as the overall strategy of concentrating employment in "growth hubs" and the like.

We urge the prioritisation of the well-being dimensions of mobility, for example accessing the natural environment, visiting and caring for family. Seeing transport largely through the economic lens of economic growth introduces distortions.

6 Digital connectivity

Mostly disagree

What is the reason for your answer?:

It's not a particular priority and the energy use and environmental impacts need examining carefully.

7 Walking and cycling network

Agree

What is the reason for your answer?:

We are very pleased to agree with and support his policy.

We note the priority of improving the local environment so it enables safe walking and cycling. This means curbing car use, including pavement parking, reducing traffic speeds and volumes and enforcing speed limits stringently, and ensuring paths and cycleways are kept repaired and free from hazards.

8 Public transport network

Neither agree nor disagree

What is the reason for your answer?:

Agree with enhancing local connections.

Disagree with High Speed Rail plans.

Want to see active discouragement and disincentivisation of air travel.

Want to see urgent improvements to the bus network to increase coverage, frequency and usability. Improvements to the bus network offer the most cost-effective and quickest way of facilitating a modal shift in transport away from the private motor car. We support calls for the re-regulation and eventual public ownership of the bus network.

9 Transport requirements of new developments

Agree

What is the reason for your answer?:

We urge local councils to establish workplace car parking levies.

Design out the car from new developments and regenerated sites, while ensuring appropriately quantified access for temporarily and permanently disabled citizens.

10 Highway infrastructure improvements

Agree

What is the reason for your answer?:

We agree so long as this means a moratorium on new highway construction.

11 Freight and logistics

Mostly disagree

What is the reason for your answer?:

We oppose any expansion of freight in the city region, especially that which expands HGV traffic and aviation.

We advocate a programmed reduction of air freight at Manchester Airport as a contribution to meeting the global carbon budget.

To advocate expansion of air freight is either an embarrassing oversight in the editing of the document, or more likely is evidence that the GM climate change strategy is not to be taken seriously.

12 Streets For All

Agree

What is the reason for your answer?:

Please see our comments on policy GM-C 3

13 Do you have any further comments on the policies and overall approach proposed in A Connected Greater Manchester?

Greener Greater Manchester comments:

Only to note the tension, contradiction even, between some great policy thinking on liveable and healthy localities on the one hand and the failure to tackle highly resource intensive sectors including aviation and road freight.

supporting info:

No file was uploaded

3. Proposed Additional Sites (Allocations)

11a Cross-Boundary Sites

5 Bury / Rochdale - GM Allocation 1: Northern Gateway

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

6 GM Allocation 1.1 Heywood / Pilsworth (Northern Gateway)

Disagree

What is the reason for your answer?: Supporting

information - file upload:

No file was uploaded

7 GM Allocation 1.2: Simister and Bowlee (Northern Gateway)

Disagree

What is the reason for your answer?:

Supporting information - file upload:

No file was uploaded

8 GM Allocation 1.3: Whitefield (Northern Gateway)

Disagree

What is the reason for your answer?:

Supporting information - file upload:

No file was uploaded

9 Oldham / Rochdale - GM Allocation 2: Stakehill

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

10 Oldham / Rochdale GM Allocation 3: Kingsway South

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

11b Bolton

11 Bolton - GM Allocation 4: Bewshill Farm

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

12 Bolton - GM Allocation 5: Chequerbent North

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

13 Bolton - GM Allocation 6: West of Wingates / M61 Junction 6

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

14 Do you have any further comments on the overall proposals for Bolton, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,

The case has not been made for any Green Belt allocations.

The development envisaged in this area over-emphasised the destructive freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.

supporting info:

No file was uploaded

11c Bury

15Bury - GM Allocation 7: Elton Reservoir Area

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

16Bury - GM Allocation 8: Seedfield

Mostly disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

17Bury - GM Allocation 9: Walshaw

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

18Do you have any further comments on the overall proposals for Bury, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

The development envisaged in this area over-emphasised the destructive freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.

11d Manchester

19Manchester - GM Allocation 10: Global Logistics

Disagree

Please explain your answer:

As noted elsewhere in our submission,
The development envisaged in this area over-emphasised the destructive aviation, freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.

Upload supporting information about this allocation:

No file was uploaded

20Manchester - GM Allocation 11: Roundthorn Medipark Extension

Neither agree nor disagree

Please explain your answer:

This is a small area connected to the hospital complex. Should the destructive Timperley Wedge not go ahead then this might be a reasonable development, subject to careful ecological assessment and appraisal of other options in the area for the proposed buildings.

Upload supporting information about this allocation:

No file was uploaded

21Manchester - GM Allocation 12: Southwick Park

Disagree

Please explain your answer:

We strongly object to this kind of placement of houses on a small piece of green space that borders the motorway. The space should be used for plantings that mitigate the noise and pollution from the motorway, not for placing housing right up against this very busy highway.

Upload supporting information about this allocation:

No file was uploaded

22 Do you have any further comments on the overall proposals for Manchester, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

11e Oldham

23 Oldham - GM Allocation 13: Ashton Road Corridor

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

24 Oldham - GM Allocation 14: Beal Valley

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

25 Oldham - GM Allocation 15: Broadbent Moss

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

26 Oldham - GM Allocation 16: Cowlshaw

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

27 Oldham - GM Allocation 17: Hanging Chadder

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

28 Oldham - GM Allocation 18: Robert Fletchers

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

29 Oldham - GM Allocation 19: South of Rosary Road

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

30Oldham - GM Allocation 20: Spinners Way/ Alderney Farm

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

31Oldham - GM Allocation 21: Thornham Old Road

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

32Oldham - GM Allocation 22: Woodhouses

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

33Do you have any further comments on the overall proposals for Oldham, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

Much of the development envisaged in this area over-emphasises the destructive freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.

11f Rochdale

34Rochdale - GM Allocation 23: Bamford/ Norden

Disagree

Please explain your answer:

This is a remaining accessible area for the local population. Its loss would mean an unacceptable loss of amenity and quality of life.

The idea of high income enclaves goes against the idea of an inclusive Greater Manchester. We encourage Rochdale to rethink its models of housing development.

Upload supporting information about this allocation:

No file was uploaded

35Rochdale - GM Allocation 24: Castleton Sidings

Neither agree nor disagree

Please explain your answer:

Relatively small site..

Upload supporting information about this allocation:

No file was uploaded

36Rochdale - GM Allocation 25: Crimble Mill

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

37Rochdale - GM Allocation 26: Land North of Smithy Bridge

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

38Rochdale - GM Allocation 27: Newhey Quarry

Mostly disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

39Rochdale - GM Allocation 28: Roch Valley

Mostly disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

40Rochdale - GM Allocation 29: Trows Farm

Mostly disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

41Do you have any further comments on the overall proposals for Rochdale, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,

The case has not been made for any Green Belt allocations.

11g Salford

42Salford - GM Allocation 30: Land at Hazelhurst Farm

Neither agree nor disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

43Salford - GM Allocation 31: East of Boothstown

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

44Salford: GM Allocation 32 - North of Irlam Station

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

45Salford - GM Allocation 33: Port Salford Extension

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

46Do you have any further comments on the overall proposals for Salford, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

11h Stockport

47Stockport - GM Allocation 34: Bredbury Park Extension

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

48Stockport - GM Allocation 35: Former Offerton High School

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

49Stockport - GM Allocation 36: Gravel Bank Road / Unity Mill

Mostly agree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

50Stockport - GM Allocation 37: Heald Green

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

51Stockport - GM Allocation 38: High Lane

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

52Stockport - GM Allocation 39: Hyde Bank Meadows

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

53 Stockport - GM Allocation 40: Griffin Farm, Stanley Green

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

54 Stockport - GM Allocation 41: Woodford Aerodrome

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

55 Do you have any further comments on the overall proposals for Stockport, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

11i Tameside

56 Tameside - GM Allocation 42: Ashton Moss West

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

57 Tameside - GM Allocation 43: Godley Green Garden Village

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

58 Tameside - GM Allocation 44: South of Hyde

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

59 Do you have any further comments on the overall proposals for Tameside, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

11j Trafford

60 Trafford - GM Allocation 45: New Carrington

Disagree

Please explain your answer:

We believe the evidence for the need to build on green belt land has not been demonstrated, as we evidence elsewhere in our submission. Certainly a development of this scale is inconsistent with the green city aspirations of Greater Manchester. We are doubtful that there will either be a population increase as anticipated (unless from climate refugees some years away still) or a shortfall in the supply of non-green belt land.

W

e note with concern that this site comprises grade 1 and 2 agricultural land, wildlife corridors and biodiversity hot spots. We do not believe that a net gain in

biodiversity can be delivered with building on this scale.
We are also concerned about the carbon sequestration loss that building on these soils will entail.
We do not necessarily oppose the building on former industrial land in the area.

Upload supporting information about this allocation:

No file was uploaded

61Trafford - GM Allocation 46: Timperley Wedge

Disagree

Please explain your answer:

This is a valued local green space, separating Trafford from Manchester and hence protecting against urban sprawl.
The case for building on this land has not been demonstrated.

Upload supporting information about this allocation:

No file was uploaded

62Do you have any further comments on the overall proposals for Trafford, including strategic transport interventions?

Context comments:

11k Wigan

63Wigan - GM Allocation 47: Land South of Pennington

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

64Wigan - GM Allocation 48: M6 J25

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

65Wigan - GM Allocation 49: North of Mosley Common

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

66Wigan - GM Allocation 50: Pocket Nook

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

67Wigan - GM Allocation 51: West of Gibfield

Disagree

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

68Do you have any further comments on the overall proposals for Wigan, including strategic transport interventions?

Context comments:

As noted elsewhere in our submission,
The case has not been made for any Green Belt allocations.

Much development envisaged in this area over-emphasises the destructive freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.

11. Overall Proposals

69 Do you have any comments on the overall proposals for Greater Manchester as a whole?

Context comments:

We reiterate our key statement that the plan starts from the wrong premises. In our answer to question 10 we explain this and indicate an alternative starting point for strategic planning in the city region. In this respect we note that the plan suffers from being a hybrid of 1) a response to government demands (NPF and housing and housing land supply targets), and 2) a proto strategic plan for the city region. Unfortunately the former, along with traditional and flawed agglomeration economic thinking, dominates the draft Framework so that the many good ideas on protecting the natural world, minimising carbon emissions, and promoting inclusivity for all citizens, appear as after-thoughts. The former is characterised by statements of the form "we will" and the latter by statements of the form "we intend to".

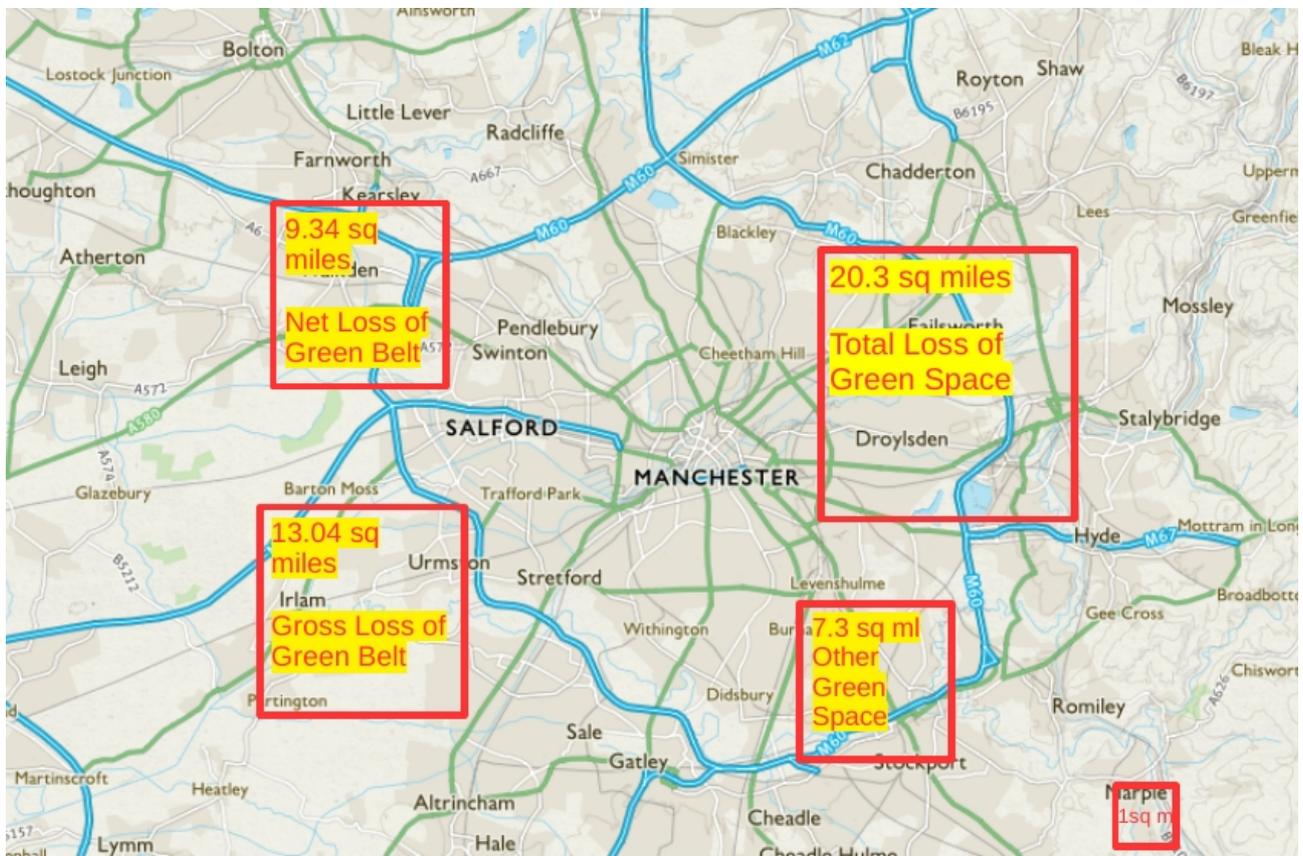
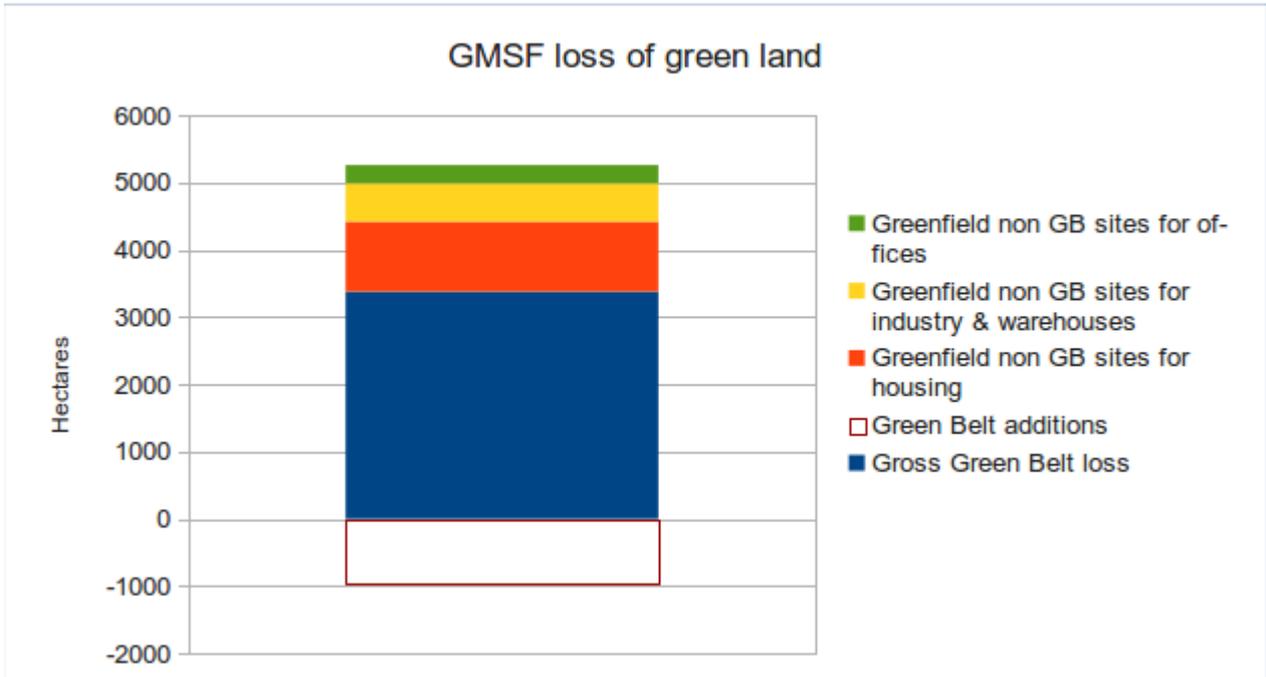
We note the rather disingenuous quotation of "net Green Belt loss". We had to conduct our own calculation to arrive at gross (real) Green Belt loss and other green space loss. The total figure of green land loss, as we demonstrate elsewhere in our response, is twice the net Green Belt loss figure.

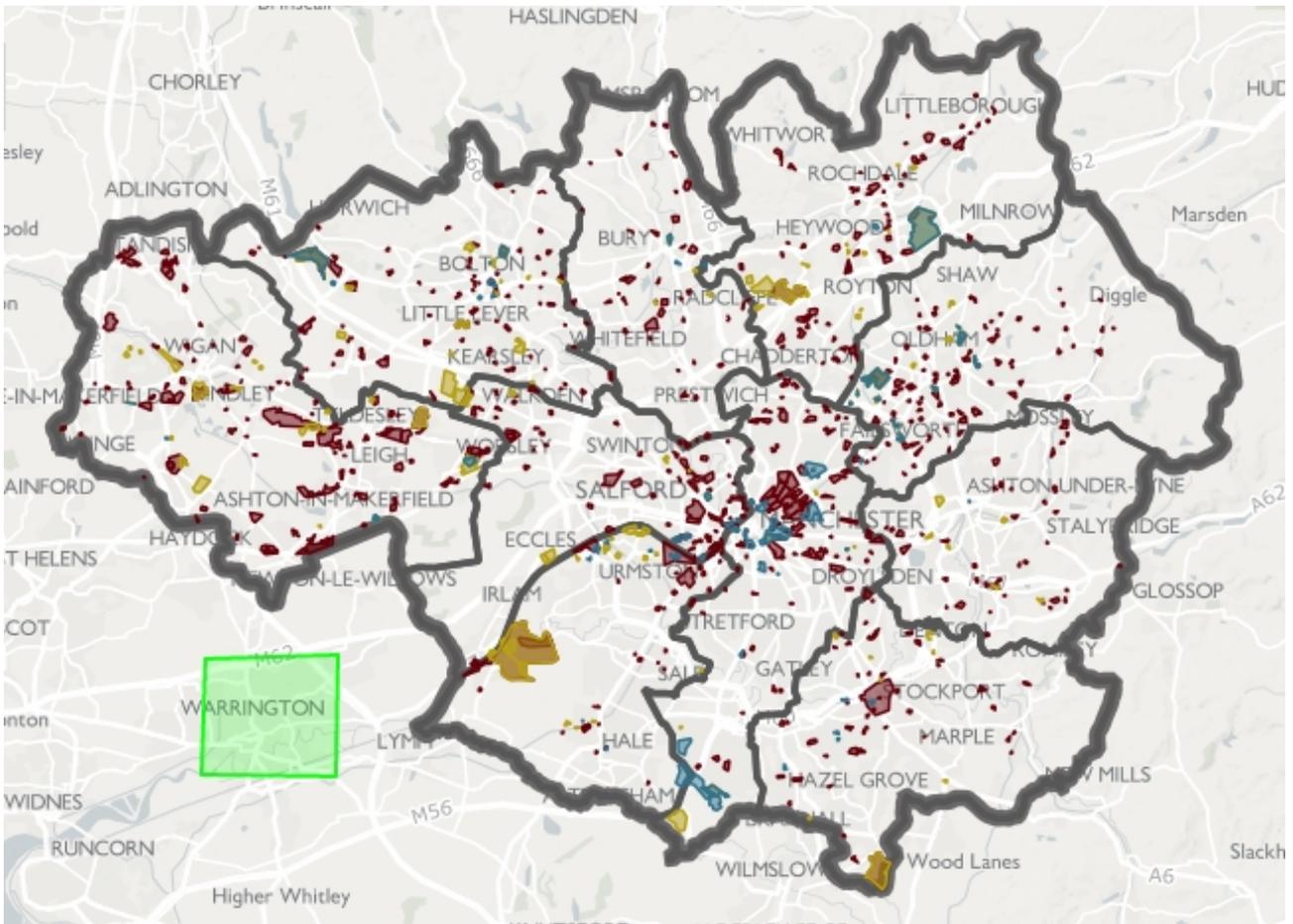
We reiterate our call for a shorter plan period and phasing of any green belt release until it is shown to be absolutely essential.

supporting info:

green space loss compilation.doc was uploaded (inserted below)

Green Space loss in the 2019 draft GMSF





Net Green Belt loss. Gross Green Belt loss. Other green space loss. Total Green Space loss. In relation to the “inside the Motorway ring” area and beyond.

Overall green space loss (the green square) in comparison to the GM territory.

Steady State Manchester. Data from GMSF draft 2019 and topic papers.

3. Delivering The Plan

5 Infrastructure implementation

Mostly agree

What is the reason for your answer?:

6 Developer contributions

Agree

What is the reason for your answer?:

We welcome this firm approach to make it more likely that developers make a real contribution to our community. We caution against the use of s106 funding for offsets of dubious validity.

Nearly there!

7 How did you hear about this survey? (please tick all that apply)

Email from someone else, Twitter – Greater Manchester Combined Authority, Twitter – Other, Other

In what other way did you hear about this survey? :

From other concerned citizens and civil society organisations.

8 To what extent do you agree or disagree with these statements?

Citizen Space - I found it easy to navigate my way through the survey:

Agree

Citizen Space - The survey has given me the opportunity to have my say:

Agree

Citizen Space - I feel better informed as a result of taking part in this survey:

Citizen Space - I feel clear about what I have been able to influence through this survey:

Disagree

Please let us know any other comments you have about using the Consultation Hub::