

Supplementary response to Manchester Local Plan consultation

From Mark H Burton on behalf of

Steady State Manchester.

To be read in conjunction with our main submission (emailed 30 April, 2020 and also available at <https://steadystatemanchester.files.wordpress.com/2020/04/ssm-response-to-mcc-local-plan-issues.pdf>)

The consultation document was somewhat confusing in that it listed objectives from the previous core strategy, then posed questions about vision and objectives and THEN listed proposed revised objectives for the local plan. We do not think we will have been alone in making comments on those former objectives. The proposed local plan objectives are rather better but still flow from what we have argued is a flawed vision. In this addendum to our response we comment on two things, 1) the proposed local plan objectives and 2) the accessibility of the consultation process to community groups.

Local Plan Objectives

(file under Q 6)

We list the proposed objectives together with our *comments*.

Local Plan proposed objectives

1. Proposed Progressive and Equitable City Objectives:

- Ensure that through high quality design we continue to create an inclusive, sustainable, attractive and accessible city.

Agree, but this needs to run throughout the other objectives and policies.

- Ensure that social infrastructure (education, social care and health) needs are considered at an early stage in the planning process

Agree, but this needs to run throughout the other objectives and policies.

2. Proposed Highly Skilled City Objectives:

- Ensure sufficient land for employment

In the abstract there is nothing to disagree with in this statement.

However, its implementation depends critically on the assumptions and forecasts made for the scale of the economy (inter alia, its growth) and the types of employment that is delivered. On the first aspect we have noted in our main response the badly flawed assumptions underpinning the core strategy and draft spatial framework. Assumptions and

projections need revision in the light of the overall global slow down, apparent at the end of 2019, the impact of brexit and the impact of Covid19 and the likelihood of an L shaped “recovery”. On the second point, if, for example, there is to be a growth in local environmental stewardship (restoration, maintenance and protection of so called natural capital) and local food production, then this will be a necessary constraint on the encroachment of the built environment on green space.

- Support low-carbon development in accessible locations that will improve the economic performance of the city and provide and attract new accessible employment, particularly in the City Centre and around the airport.

We fully support the aim of low carbon, or better, zero carbon, development. We fundamentally disagree with the strategy of concentration of development (and hence employment) in particular “hub” locations. See our comments under question 2 on the alternative principle of a polycentric city region, or better, “bioregion”.

- Improve the education and skills of Manchester residents so that they are able to participate in the growth of the city and through employment, benefit from its prosperity.

This is an improvement on the statement in the core strategy that fetishises global competitiveness. There is an opportunity in Greater Manchester to develop, in partnership with colleges, other anchor institutions and the SME sector, an education and vocational curriculum fit for the post carbon, low energy future.

3. Proposed Connected City Objectives:

- Improve the physical connectivity of the city, through sustainable, accessible and resilient transport networks, to enhance its competitiveness, provide access to jobs, services, shops, and leisure opportunities, whilst addressing air pollution and greenhouse gas emissions.

We agree to some extent. It is important to move to a lower carbon, lower emissions model for human mobility throughout the city.

However, as noted elsewhere, we reject all reference to the zero sum and unethical “game” of competitiveness. The key issues are ensuring people can get to work, play and to loved ones, easily and affordably, in ways that maximise health and well-being. That means maximising active travel and low carbon, integrated public transport (which will be challenged due to lower occupancy, post Covid) and making a full frontal assault on the private car as well as unnecessary white van “final

mile” deliveries. The return of urban space, commanded by motor vehicles, to pedestrians and non-mobility uses will be an invaluable co-benefit.

- Ensure that the opportunity created by the proposed High Speed 2 station at Piccadilly to increase investment within the city and the wider conurbation is fully captured.

We broadly commend the proposals for the Mayfield development. We call for an urgent review of Manchester's commitment to HS2. As Lord Jim O'Neill noted this week¹, it seems less likely that it will actually be built. Instead the priority of improving local and regional integrated and low carbon public transport should be prioritised. A complete rethink of the previously dominant agglomeration economics is required.

- Support the growth of Manchester Airport as the North of England's principal international gateway.

We completely reject this folly, incompatible as it is with the first draft objective. As a consortium of scientists recently noted in a closely argued and referenced report, Absolute Zero², UK airports will need to close in order to meet the UK's carbon budget target (let alone the more ambitious Manchester one). Start planning now!

4. Proposed Thriving and Sustainable City Objectives:

- Protect and enhance the quality and function of both the natural and built environment of the city, and providing improved opportunities for a healthy, active lifestyle.

Agree.

- Enable everyone living, working or visiting the City to enjoy the experience and contribute towards its sustainable growth.

Elsewhere we note that there is no such thing as sustainable growth. We would amend this to say that everyone should enjoy and contribute to the city's sustainable prosperity (a concept that is compatible with the required contraction of the material flows of the modern economy³).

- Support the sustainable growth of the City Centre as the primary focus for economic and housing development in the City, and as the principal public transport hub for the north of England.

We reject the objective of expanding the city centre, whether, laterally, vertically or in terms of its overall exchange values (economic transactions). As we argue elsewhere, we propose instead a

1 <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/weve-seen-nothing-like-1930s-18170878>

2 <https://climatenewsnetwork.net/uk-airports-must-shut-to-reach-2050-climate-target/>

3 See for example Jackson, T. (2017). *Prosperity without growth: Foundations for the economy of tomorrow* (Second Edition). Routledge, Taylor & Francis Group. <https://tinyurl.com/y7v1kzs3>

polycentric 20 minute model for the city and the city region. It makes no sense for Manchester to be the principal public transport hub for the North: that would be geographically nonsensical as a glance at the map will show.

- Continue to enhance the environment of the City Centre to make it a more attractive and resilient place and thereby help ensure its future prosperity.

We agree with this aim. It means radical restriction of motorised traffic and the reclamation of public space: it is good to see moves such as the experimental closure of a section of Deansgate, but much more is required. We propose a moratorium on high rise development in the city, though this is likely to ensue de facto as speculative capital dries up.

5. Proposed Living and Low Carbon City Objectives:

- Contribute to addressing the causes and consequences of climate change by reducing carbon emissions to meet the carbon budget of 15mill tonnes, promoting green infrastructure, using sustainable natural resources and incorporating resilience within its design and operation.
Fully agree but please ensure all other objectives are consistent with this.
- Provide for a significant increase in high quality housing provision, affordable to all income groups, in attractive, safe and cohesive neighbourhoods.

The comment we made in our main response, in relation to the core strategy objectives is still relevant here so we reproduce it:

Fisrtly, projections on population, household formation and housing need need a radical review in the light of brexit, the Covid19 pandemic and slowing economic growth/contracting economy.

Much of the housing stock is perfectly sound but it requires improvements, particularly to reduce its energy demand. Newly built housing can only meet a small part of the emissions reduction target and the energy costs (both on and off site) of construction, and hence carbon emissions, are significant. So a policy of refurbish and restore first should be followed.

As the climate crisis intensifies, and hence the need to protect green space and other natural resources is heightened, it may be that a “presumption against development” would be more apt to our collective predicament, although we do recognise that this would run counter to the present, developer-centric, National Planning Framework.

- Support a network of distinctive high quality centres, strengthening local identity and providing essential services close to homes.
We are pleased to see this objective introduced. It is consistent with our thinking and recommendation of a polycentric city and region. However, some of the other objectives are inconsistent, in particular the emphasis on growth hubs, such as the city centre and airport districts.
- Use existing assets to define and improve the character and sense of place within neighbourhoods.
This is consistent with our argument in response to the objective before the previous one. We support it.

Accessibility of consultation

(file under **Q 36**, Other Issues)

As the mistake we made in originally responding to the wrong set of objectives might suggest, even relatively informed and IT-competent citizens are challenged by the way this consultation has been designed and presented. This is a major problem and Manchester still has a long way to go in making consultations genuinely accessible and responsive to citizen interests and views. The pre-lockdown plan to hold just three public meetings for this consultation was woefully inadequate. We suggest that the consultation should start before objectives and plans are drafted so they can be shaped by citizen voices. We are particularly concerned that efforts be made to engage with and facilitate the participation of less advantaged community groups. There are a number of networks in the City of Manchester that would be able to work with the council to facilitate this sort of targeted engagement either at local levels or city-wide such as the Inner City Exchange Manchester platform facilitated by CLASS and the Greater Manchester Savers network which draws together community groups from disadvantaged neighbourhoods across the City of Manchester. The burgeoning of locally based climate activism, partly initiated and supported by Manchester councillors and officers in the wake of the climate emergency declaration is another good example of citizen input to the design and redesign of our city. Areas such as Whalley Range and Chorlton have developed or developing consortia of community organisations: for this to happen elsewhere will require investment by the council in independently governed community development officers.

1st May, 2020