

Response to public consultation on Greater Manchester Combined Authority's *Places for Everyone* Plan.

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Preamble

Steady State Manchester supports the drawing up of a sub-regional strategic spatial plan. Done to an adequate standard it would,

- Provide a vision for a Greater Manchester fit for the unprecedented environmental, social and economic challenges of the coming decades.
- Strengthen the planning function to mitigate the threat of speculative development that puts profits before social and environmental considerations.
- Ensure that local councils can work together on those issues most suited for resolution at the sub-regional level.

However, while an improvement on earlier iterations, and containing some very positive elements, we submit that the present plan is flawed on a number of counts and we therefore believe that it does not meet the tests of soundness in the National Planning Framework. We believe that it should be revised and resubmitted to address these shortcomings.

Throughout there has been a lack of true collaboration with citizen groups who collectively have considerable expertise and commitment and who, with the support of planning professionals, could have helped write a more

adequate plan, consistent with protecting and restoring the the region's ecological assets while meeting objective economic and social needs.

Loss of Green Space

It is important to be clear about the amount of green space to be lost according to the plan. This information is not presented transparently in the P4E report which presents a figure for net green belt loss. This figure is the total green belt loss minus the re-designations of currently unprotected green space as green belt. While the improved protection for those spaces is welcome, the net figure is misleading since it reduces the total by those spaces that are already green space. So the gross green belt loss is the relevant figure. This is either 2336.9 hectares (the sum of the green belt "allocations", i.e. withdrawals from the allocations spreadsheet in the supporting documents) or 2429.4 hectares (the sum of the net green belt loss and the green belt additions, from the main P4E paper).

This is not the whole picture, however. P4E identifies non green belt earmarked for building under three categories, housing, industry and warehouses, and offices. The main Places for Everyone report and the supplementary papers give most of the relevant figures, although it takes an effort to put them together, given that they are scattered across several documents. Most of the sites are identified in terms of area, either hectares or square metres, and the former unit is used below. However, non-green belt housing sites did not have areas identified: instead it was the number of housing units. Therefore a series of Freedom of Information Act requests were made to GMCA and the 10 councils for the relevant information in December 2020¹. Note that the plan at that time included Stockport which has since withdrawn. Figures below have been amended to reflect that. Bury council stated that they did not have the information. We asked for an internal review since this was considered implausible but have had no response other than an acknowledgement in early 2021. Therefore Bury's area of non-green belt housing sites has been estimated from their figure for housing units, using the mean density of the two peripheral neighbouring councils, Bolton and Rochdale (considered more similar to Bury than Manchester and Salford).

Non-green belt sites are classified as greenfield, brownfield, or mixed. We have not included brownfields and mixed sites. The brownfields classification

¹ https://www.whatdotheyknow.com/user/mark_h_burton/requests

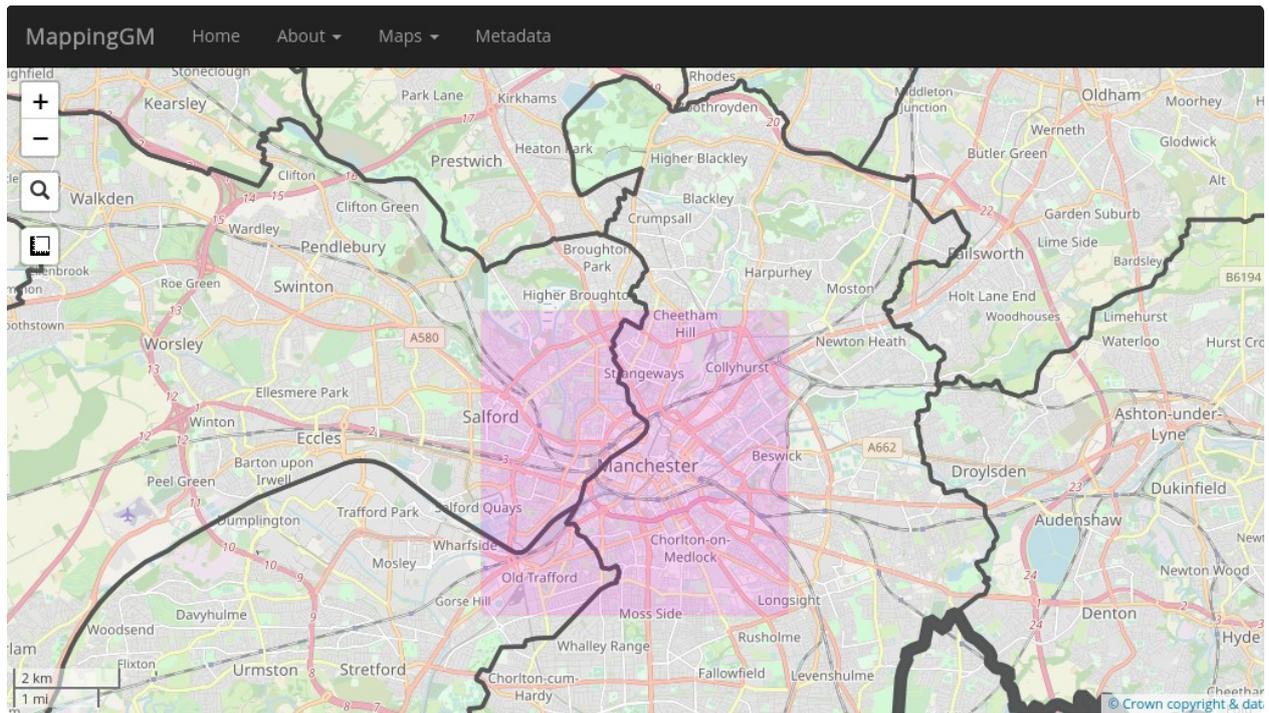
probably includes some sites that were formerly industrial but then returned to nature but there is no way to quantify that proportion. Moreover, if greenfields are to be protected and some development is to take place, then it will be necessary to prioritise brownfields. Similarly, the figure for the green element of mixed sites is not included. Although this is small, the total below will nevertheless therefore be an underestimate. The resultant figures are as follows:

Category	hectares	sq miles
Net Green Belt release	1,754	6.8
Green Belt additions	675	2.6
<i>Gross Green Belt loss²</i>	<i>2,337</i>	<i>9.0</i>
(Gross Green Belt loss ³	2,429)	
Greenfield non GB sites for housing	1,089.7	4.2
Greenfield non GB sites for industry & warehouses	60.6	0.2
Greenfield non GB sites for offices	24.4	0.1
<i>Total non GB Green Space loss</i>	<i>1,174.8</i>	<i>4.5</i>
Total Green land loss Ha	3,511.7	13.6

To visualise the area of land that would be lost, the equivalent area can be superimposed on a map showing the boroughs of Manchester, Salford and Trafford.

2 from allocations spreadsheet (supporting document): this figure used in calculations

3 from additions plus net release (main paper)



We submit that the plan has not presented this information clearly to the public. The information is mostly there in the documentation but it requires a considerable effort for a citizen to establish the actual figures. **We propose that the plan be revised to include a transparent and concise summary of the changes to land use that are envisaged or implicit in the plan.**

Comments on the Integrated Assessment for *Places for Everyone*.

The Integrated Assessment (IA) underpins the Places for Everyone Plan (P4E). It includes the Sustainability Appraisal, Strategic Environmental Assessment, Equality Impact Assessment and Health Impact Assessment. The Integrated Assessment of 2020 was updated with a scoping paper for 2021. It seems that there are no major changes.

Following the IA Scoping Report baseline evidence update in 2020, no changes to the IA objectives or criteria are recommended. It is noted that the declaration of climate emergencies by GMCA and the 10 local authorities, is the most significant shift since the previous update to the Scoping Report. The IA objectives and criteria particularly related to climate emergency have been carefully considered to establish whether there has been a material change requiring an amendment. As a result of the update, it is concluded that no additions or changes are required at

this stage, but any emerging evidence will be considered as part of the updated IA assessment. Scoping Report, page 15.

We make the following comments on flaws that we have identified in the IA.

The IA assesses a number of desirable outcomes (IA objectives) against the P4E Objectives. Table 10: IA Compatibility Analysis of the 2020 draft GMSF objectives is reproduced here with labels for objectives (abbreviated where necessary).

IA Objective	GMSF Objective									
	1	2	3	4	5	6	7	8	9	10
	Meet our housing need.	Neighbourhoods of choice	Thriving and productive economy	Maximise potential of assets	Reduce inequalities / improve prosperity	Promote sustainable movement.	Resilient and carbon neutral city-region	Natural env. / green spaces	Ensure access phys & soc infrastructure	Promote community health and wellbeing
1 Housing	++	++	○	+	+	?	?	+	+	+
2 Employment	○	?	++	++	+	?	○	○	+	○
3 Transport and Utilities	○	+	○	+	+	++	+	?	+	○
4 Deprivation	+	○	+	?	++	?	○	○	+	+
5 Equality	+	+	+	○	++	?	?	+	+	+
6 Health	?	+	○	○	+	?	+	+	+	++
7 Social Infrastructure	?	?	○	?	○	○	○	+	++	+
8 Education and Skills	○	○	?	?	+	○	○	○	+	○
9 Sustainable Transport	○	++	○	+	+	++	+	?	+	+
10 Air Quality	?	+	○	○	○	+	+	?	?	+
11 Biodiversity/ Geodiversity	○	?	○	○	○	○	○	++	○	○
12 Climate Resilience	○	?	○	?	○	○	+	++	○	○
13 Flood Risk	○	+	○	○	○	○	○	++	○	○
14 Water Resources	○	○	○	○	○	○	○	○	?	○
15 Greenhouse Gases	?	+	○	?	○	+	++	?	?	○
16 Landscape and Heritage	○	+	○	+	○	○	○	++	○	○
17 Land Resources	?	+	?	○	?	○	○	+	○	○
18 Resource Consumption	○	○	○	○	○	○	+	○	○	○

We consider that ratings of P4E Objectives against the IA Objectives are inappropriate. The lack of any negative ratings in the summary table (i.e. that there is some incompatibility between P4E and IA objectives)

suggests a bias towards optimism or even the suppression of inconvenient evidence. This point can be made with respect to many of the objectives but the following two will be used illustratively.

1, Biodiversity / Geodiversity Full definition (our emphasis): *“Conserve and enhance biodiversity, green infrastructure and geodiversity assets.”*

Criteria:

1. *“Provide opportunities to enhance new and existing wildlife and geological sites?”*
2. *“Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features?”*
3. *“Support and enhance existing multifunctional green infrastructure and / or contribute towards the creation of new multifunctional green infrastructure?”*
4. *“Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?”*

P4E objectives 1, 3 and 5 (housing, thriving economy, increased prosperity), as the plan proposes to meet them, are relevant to this objective in that the projected loss of green space proposed in the plan (3,511.7 hectares or 13.6 sq miles, for all green space and 2,336.9 ha or 9.0 sq miles for green belt allocations, is potentially highly incompatible with this IA objective.

Likewise, P4E objective 4, (maximise use of assets) is likely to be relevant in that it entails impacts on natural assets and wildlife.

15, Greenhouse Gases Full definition: *“Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions.”*

Criteria:

1. *“Encourage reduction in energy use and increased energy efficiency?”*
2. *“Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?”*
3. *“Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?”*

P4E objectives 3 and 5 (thriving economy and increased prosperity), as the plan proposes to meet them, are relevant to this objective in that the projected levels of economic growth, with the consequent material and energy usage (in construction, embodied and operational), together with loss of green spaces are potentially highly incompatible with this IA objective.

Likewise, P4E objectives 1 and 4, (Housing and “maximise use of assets, insofar as the latter entails airport expansion) are clearly relevant and again potentially threaten the objective of reducing greenhouse gas emissions (and staying within Greater Manchester’s Carbon Budget).

With regard to the inadequate assessment of impacts on these environmental processes and resources, it is worth noting the government regulations on strategic environmental assessment (which form part of the integrated assessment). The assessment needs to assess the following.

f) *The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects*⁴.

We submit that the Integrated Assessment fails in meeting this requirement, since it does not take into account the systemic interrelations among these factors, including the cumulative impacts. Instead, a simplistic checklist approach has been taken, which is insufficient for proper understanding of impacts and how they combine.

We propose that the relevant (Strategic Environmental Assessment) sections of the Integrated Assessment be conducted again, to the required standard (or above).

The Health component of the IA is supposed to take a number of determinants of health into account. In particular we highlight “Climate change, Biodiversity, Natural Environment: Natural habitat; Air; Water; land”. These are listed but again the P4E objectives that are identified as covering them (10, 11, 12, 14) are limited to those that deal with these elements **directly**. However, as indicated above, P4E objectives 1, 2, 3, 4, 5, 9 will all impact on these determinants of health. The Department of Health HIA screening questions, quoted on page 17 (logical page number 23) of the IA report are (we have numbered them),

- 1. *Will the proposal have a direct impact on health, mental health and wellbeing?***
- 2. *Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?***
- 3. *Will the proposal affect an individual’s ability to improve their own health and wellbeing?***
- 4. *Will there be a change in demand for, or access to, health and social care services?***

⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580073/Strategic_Environmental_Assessment_Regulations_requirements_checklist.pdf

5. Will the proposal have an impact on global health?

We submit that the proposals in the plan under objectives 1, 2, 3, 4, 5, 9 will either directly or indirectly have impacts under all the above questions. This is because reducing access to green space, reducing the carbon sequestration resource and natural capital resource, and emitting significant constructional and operational emissions, will affect people's opportunities for recreation and connection with the natural world, will reduce the scope for mitigating both greenhouse gas emissions and their impact, for populations locally and globally, and will with some likelihood indirectly lead to an increase in demand for health and social care services.

We therefore submit that the Health Impact Assessment component of the IA has not been carried out adequately.

We recommend that it be carried out again, to at least an adequate standard, utilising expert advice from the experts on the relationships between public health, the natural environment and climate change.

Carbon

This section expands on the comment on the Integrated Assessment, that the carbon consequences of the plan have not been properly assessed. If we are to evaluate a spatial plan then we need to understand the likely carbon impacts of development on what are now green spaces.

Freedom of information request and GMCA's refusal.

A Freedom of Information Act (FOIA) request was made as follows on 17 August, 2021.⁵

1) Assessments and/or calculations of the projected carbon emission impacts of the Places for Everyone 2021 plan. This should cover,

a) Gains and losses of carbon sequestration due to proposed land use changes in the plan.

b) Embodied carbon estimates due to the proposed building programme in the plan.

c) Carbon impact of projected aggregate GVA growth that the plan assumes.

d) Carbon emission estimates from changes to journeys made by GM's population and to transport infrastructure.

e) Carbon emissions estimated due to the proposed near doubling of flights from Manchester Airport.

2) Estimates made of the carbon emissions consequences (as defined in a, b and d above) for each of the 38 Green Belt Allocations identified in Places for Everyone.

⁵ The request and the response are available at https://www.whatdotheyknow.com/request/carbon_metrics_places_for_everyo#incoming-1875367

3) *In the event of the above information not existing, please supply details (including minutes, correspondence, reports) of the process by which it was decided not to make these assessments and how these relate to both the GM and UK government Climate Budgets.*

GMCA responded to our request on 14 September with a refusal⁶. They say that the information requested is in the P4E main document and supporting documents, referring us to several documents. **Having checked those documents we are still of the view that the information requested is not there. Most significantly, there are no calculations of the carbon consequences of the developments proposed and the green space lost.** Accordingly, we made our own calculations to arrive at estimates of the likely scale of the carbon emission consequences. These are available on request and might be of assistance for when GMCA makes the necessary assessments missing from the IA and plan.

As Paragraph 1a of the Planning and Compulsory Purchase Act 2004 makes clear,

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.”⁷

We submit that P4E falls far short of this requirement.

We propose that the plan be rewritten to a) estimate its carbon consequences and b) to build in proportionate and adequate mitigation and preventative measures, together with proposals for radically increasing the carbon sequestration from the City Region's green spaces.

Growth assumptions

P4E makes very high assumptions about the overall growth of the Greater Manchester Economy.

“This plan supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the even longer-term.

However, delivering these high levels of growth will become increasingly challenging. Beyond the slowdown in productivity growth seen across the UK economy, and increasing international competition for trade and

6 For the FOIA request and refusal see

https://www.whatdotheyknow.com/request/carbon_metrics_places_for_everyo#incoming-1875367

7 <https://www.legislation.gov.uk/ukpga/2004/5/section/19>

capital, Greater Manchester also faces the challenges of accommodating rapid technological change, and political risks and economic shocks such as Brexit and Covid-19. Greater Manchester will therefore need to continue to invest in the sites that will make it an even more attractive place for businesses to invest, bringing high-value, well paid jobs, to the city region, and supporting the continued progress towards a low-carbon economy⁸.”

GMSF Growth Option 2: “Meeting assessed needs” was the preferred one which informed the two previous versions of GMSF. However, *“the assumed path of GVA for GM under the Accelerated Growth Scenario (AGS-2019) used to inform the GMSF Growth Option 2: “Meeting assessed needs” was, over this period around 2.4% pa.”* i.e., despite the GMCA choosing option 2, it used option 3 (Accelerated growth) to inform it.

The Nicol report⁹, commissioned by GMCA to advise on growth projections, suggests:-

- 1) Likely 2-3%¹⁰ smaller UK economy as a result of EU exit and Covid19. This works out at about -0.1% to -0.2% p.a. (note that this is cumulative). The AGS scenario had a “deliberately ambitious” 2.4% pa. There is evidence that GM is slightly worse affected than the UK economy as a whole.
- 2) Increased need for warehousing and logistics as a result of a 5% (residual) shift to internet shopping and need for higher stock inventories due to EU exit. However, it should be noted that the total volume of sales is not likely to be higher, and given economic scarring could be lower. The increase in Internet retail will be subject to a ceiling (it cannot increase for ever). Moreover, the biggest increase is likely to have happened already: this appears to have been absorbed by current infrastructure. (the Savills report cited by Nicol, indicates that there is still a 5% level of spare capacity). *“The effect of Covid-19 and the lockdowns has been to “supercharge” what was already an established trend”*. So it seems unlikely that this will in the medium to longer term alter the level of requirement for this kind of industrial space.
- 3) There are some indications that demand for office space will decrease as a longer-term impact of working from home arrangements. Firms and other organisations have discovered that they can reduce accommodation costs by maintaining in part these arrangements.
- 4) There is uncertainty about the future pattern of housing need as a result of Covid-19 and EU exit. Household formation rates could reduce in the near term but affordability could increase due to reduced competition.

8 Employment topic paper, paras 8.7, 8.8.

9 Nicol consulting report: <https://greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/05%20Places%20for%20Jobs/05.01.03%20COVID-19%20and%20Pfe%20Growth%20Options.pdf>

10 OBR: 3%, BoE 2%

“As of March 2021, our conclusion remains broadly similar to that set out in August 2020. This was that given the significant degree of uncertainty that exists about future events and their implications for GM, there is not sufficient certainty/evidence currently available to inform a robust “reasonable alternative” growth option for purposes of the PfE 2021 Plan.”¹¹

However, there is certainly no cause to argue for greater levels of growth. The consensus view of the UK’s annual growth rate in 2024 (after the misleading annual gains in earlier years, which are an artefact of recovery from the very depressed levels during the Covid lockdowns) is that growth will be well below 2%¹². The annual rate for the North West in that year could be 0.2% below the UK rate¹³. The question is what will be the reduction on the forecasts and scenarios that informed GMSF and continue to inform P4E? It is worth noting that **in the last 13 years there have been three major economic disruptions**. The Great Financial Crash, the Global Covid pandemic, and Brexit. **It seems, a priori, unlikely that there will not be further major economic shocks¹⁴ over the 17 years of the P4E plan.** Therefore the economic scenarios used in P4E would likely be over-“optimistic”.

GMCA will probably argue that lower expected GVA/GDP growth rates are a case for more aggressive speculative development of hard infrastructure to secure more economic growth. This is a dangerous assumption. Increased economic growth brings a host of problems, including increased material and energy use and hence increased carbon emissions and costs¹⁵, displacement of labour and increased inequality since “a rising tide sinks some boats”¹⁶. We submit that rather than seeking increased economic growth, the GMCA

11 *Covid-19, EU-Exit and the Greater Manchester Economy - Implications for the Greater Manchester Places for Everyone Plan*. Nicol Economics, March 2021 Paragraph 1.89, page 32.

<https://greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/05%20Places%20for%20Jobs/05.01.03%20COVID-19%20and%20PfE%20Growth%20Options.pdf>

12 <https://www.gov.uk/government/collections/data-forecasts>

13 <https://www.niesr.ac.uk/publications/uk-economic-outlook-summer-2021-emerging-shadow-covid-19>

14 Due to cyclical crisis tendencies of the global economic system, future pandemics, climate change, wars and conflict, resource supply shocks, major pollution incidents and “unknown unknowns”.

15 Haberl, H., Wiedenhofer, D., Virág, D., Kalt, G., Plank, B., Brockway, P., Fishman, T., Hausknost, D., Krausmann, F., Leon-Gruchalski, B., Mayer, A., Pichler, M., Schaffartzik, A., Sousa, T., Streeck, J., & Creutzig, F. (2020). A systematic review of the evidence on decoupling of GDP, resource use and GHG emissions, part II: Synthesizing the insights. *Environmental Research Letters*, 15(6), 065003. <https://doi.org/10.1088/1748-9326/ab842a>

Parrique, T., Barth, J., Briens, F., Kraus-Polk, A., Spangenberg, S. H., Kerschner, C., & Spangenberg, J.H. (2019). *Decoupling debunked: Evidence and arguments against green growth as a sole strategy for sustainability*. European Environmental Bureau. <http://eeb.org/library/decoupling-debunked>

Wiedmann, T. O., Schandl, H., Lenzen, M., Moran, D., Suh, S., West, J., & Kanemoto, K. (2015). The material footprint of nations. *Proceedings of the National Academy of Sciences*, 112(20), 6271–6276. <https://doi.org/10.1073/pnas.1220362110>

16 Tcherneva, P. R. (2015). When a Rising Tide Sinks Most Boats (Policy Note No. 2015/4). Levy Economics Institute. <http://www.levyinstitute.org/publications/when-a-rising-tide-sinks-most-boats-trends-in-us-income-inequality>

should be establishing a steady state economy fit for the post-growth reality of climate change and constraints on materials and energy¹⁷.

We submit that the plan has consistently over-estimated future growth rates. It has failed to make sufficient adjustment for the reduced GVA growth rate following recent and future systemic shocks.

We propose that the plan be amended to reduce the growth assumptions. This should be supplemented by an assessment of the impact of moving to a steady state economy, the adoption of which is indicated by the climate crisis¹⁸.

Industry

Airport

Other submissions will go into this question in detail. We make the following points.

- It is reckless to propose a doubling of flights from Manchester Airport, given the inevitable rise in greenhouse gas emissions, noise and sprawl that will follow.
- Given that P4E states its commitment to reducing greenhouse gas emissions, a near doubling of flights must be thought to be possible while reducing greenhouse gas emissions. The scientific consensus view it that while it is reasonable to expect some further improvement in aircraft fuel efficiency and hence relative reduction of CO₂ emissions, this will be nowhere near enough to allow the kind of increase projected

17 Jackson, T. (2017). *Prosperity without growth: Foundations for the economy of tomorrow* (Second Edition). Routledge, Taylor & Francis Group.

<https://www.book2look.com/embed/eFJiPjyMKG&euid=68185891&ruid=68174127&referurl=www.routledge.com&clickedby=H5W&bibletype=html5>

Lange, S. (2018). *Macroeconomics without growth*. Metropolis-Verlag.

Millward-Hopkins, J., Steinberger, J. K., Rao, N. D., & Oswald, Y. (2020). Providing decent living with minimum energy: A global scenario. *Global Environmental Change*, 65, 102168.

<https://doi.org/10.1016/j.gloenvcha.2020.102168>

Wiedmann, T., Lenzen, M., Keyßer, L. T., & Steinberger, J. K. (2020). Scientists' warning on affluence. *Nature Communications*, 11(1), 3107. <https://doi.org/10.1038/s41467-020-16941-y>

18 Hickel, Jason, Paul Brockway, Giorgos Kallis, Lorenz Keyßer, Manfred Lenzen, Aljoša Slameršak, Julia Steinberger, and Diana Ürge-Vorsatz. 'Urgent Need for Post-Growth Climate Mitigation Scenarios'. *Nature Energy*, 4 August 2021. <https://doi.org/10.1038/s41560-021-00884-9>.

<https://doi.org/10.1038/s41560-021-00884-9>

Keyßer, Lorenz T., and Manfred Lenzen. '1.5 °C Degrowth Scenarios Suggest the Need for New Mitigation Pathways'. *Nature Communications* 12, no. 1 (December 2021): 2676.

<https://doi.org/10.1038/s41467-021-22884-9>.

Nieto, Jaime, Óscar Carpintero, Luis J. Miguel, and Ignacio de Blas. 'Macroeconomic Modelling under Energy Constraints: Global Low Carbon Transition Scenarios'. *Energy Policy* 137 (1 February 2020): 111090. <https://doi.org/10.1016/j.enpol.2019.111090>.

Bordera, F Valladares, A Turiel, F Puig Vilar, F Prieto, and T Hewlett. 'Leaked Report of the IPCC Reveals That the Growth Model of Capitalism Is Unsustainable.' *Monthly Review*, 23 August 2021.

<https://mronline.org/2021/08/23/leaked-report-of-the-ipcc-reveals-that-the-growth-model-of-capitalism-is-unsustainable/>.

by P4E. Moreover, neither electric flights nor clean aircraft fuels are likely to be developed within the strategic period, at least not to the scale required for mass aviation¹⁹.

- It is bizarre to say the least to claim that, somehow developing the airport (in this way) will help to address climate change. (Policy JP-Strat 10).

We submit that the proposal to increase the activity of Manchester airport by a factor of two contradicts the plan's commitment to reducing carbon emissions.

We propose that the plan be re-written with robust proposals for reducing the number of flights from the airport and eventual closure of at least one runway. Those proposals should specify a strategy for alternative employment and alternative economic activity to replace the city region's economic aviation dependency on an equitable basis.

Port Salford

The proposals in the plan rest greatly on the following assumptions.

"The combination of excellent water, rail and road access, including direct shipping links to the post-panamax facility at the Port of Liverpool, will make Port Salford one of the most attractive locations in the country for industrial and warehousing development." Paragraph 11.262

"One of the key attributes of Port Salford is its potential to remove freight from roads and move it more sustainably by rail and water, and it will be vital that any development of the site takes advantage of this by utilising the infrastructure delivered as part of the permitted scheme." Paragraph 11.263

There seems to have been no robust assessment of the plausibility of these assumptions. The plan appears to assume that containers will be trans-shipped from the large post-panamax vessels at Port Liverpool, carried by ship-canal going boats to Port Salford and then trans-shipped again onto roads, that will have to be expanded and rail that does not exist. We submit that this is in the realm of fantasy.

As the plan itself notes,

"...the expansion of Port Salford will generate significant additional traffic and highway improvements (sic) to cater for these demands should be delivered as part of the site's development." So expansion of motorways and other roads is inherent in the proposal. Paragraph 11.263

This requires a proper consideration in the Strategic Environmental Assessment (part of the IE), but this is missing from the documentation. **We**

¹⁹ See for example the Absolute Zero report by University of Cambridge-based scientists.
<https://doi.org/10.17863/CAM.46075>

consider this to be in breach of both the planning and climate change legislation.

As we noted in our response to the last consultation,

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"²⁰ relying so much on transporting freight on roads and motorways, a fundamentally unsustainable solution with extremely negative impacts on human health, happiness and prosperity, and on the climate.

Again, it is clear that the consequences for health and environment, including air quality and greenhouse gas emissions have not been properly assessed and taken into account. The Integrated Assessment concluded that in relation to population health and well-being, there would be “Neutral/no effect against this objective and assessment criteria anticipated” from the Port Salford proposals. This is clearly incorrect.

In relation to air quality (with the exception of an increase in private car transport), the IA concluded that “*This policy seeks to develop an integrated tri-modal facility at Port Salford. Integrating operations could reduce emissions and therefore this policy has a positive effect.*” Yet clearly the increase in lorry journeys will have the opposite effect, as anticipated in the plea for road “improvements”.

In relation to greenhouse gas emissions the IA is similarly blasé: “*This policy seeks to develop an integrated tri-modal facility at Port Salford. Integrating operations could reduce emissions and therefore this policy has a positive effect.*” This is again highly implausible suggesting at best an incompetent assessment.

We submit that the Port Salford element of the plan is based on unsound assumptions and inadequate assessment.

We propose the scaling down of the proposal, based on a realistic appraisal of the potential of the ship canal for replacing road transport.

²⁰ The title of the 10-district version of P4E

Office accommodation

The plan has not made changes to the projections for new office accommodation. Yet research indicates the strong likelihood of a permanent change in the proportion of hours worked from home following a post-covid economic recovery.²¹

We submit that the permanent reduction in the need for office accommodation has not been used to revise the plan's projections for office development.

We propose that the plan be revised to allow for these changes.

The Rural Economy

40% of Greater Manchester is green space and much of this is rural. There is no mention of the rural economy in the plan. This is a serious omission from a plan that aspires to be strategic and covers such a long period. With the likelihood of geopolitical, resource, supply chain, climatic, economic and other systemic shocks over that period, there will almost certainly be a need to maximise the contribution from the rural economy.

We propose that the plan be revised to include a section with proposals for strengthening and greening the rural economy as a key element of the region's economic, social and environmental strategies.

Housing

Population

Population increase, 2021-2037 for the nine districts is now projected to be:

2021 (ONS mid year estimate): 2,554,000

2037 (P4E): 2,712,194

Change: 158,194 (6.19%)

Interestingly, the equivalent figures for the GM Area, i.e. including Stockport are

2021: 2,848,286

2037: 3,038,286

Change: 190,000 (6.67%)

²¹ <https://www.cipd.co.uk/about/media/press/home-working-increases>
<https://employernews.co.uk/news/survey-finds-huge-rise-in-home-working-increased-human-resources-workloads/>

In other words, taking Stockport out has decreased the projected population growth rate significantly: Stockport will now have to accommodate that change within its own boundaries, reducing pressure on the other districts, principally Manchester and Salford.

Households and housing

P4E projects building 164,880 homes over the 16 year period 2021-2037. That is 10,305 per year. Note that this figure is the result of using the standard government Housing Need Methodology.

This gives a ratio of 1.04 people per home. That's an extraordinary ratio, although it assumes that the inhabitants of the new homes are those counted in the population growth figures. Instead, we should take account of the rehousing of people presently in the population and also assume that some of the population growth would be accommodated in the existing housing stock. To estimate that we can compare the two overall ratios of people per homes at the start and end of the plan.

2021: People: 2,554,000 Homes: 1,064,167 Occupancy: 2.4

2027: People: 2,712,194 Homes: 1,229,047 Occupancy: 2.21

But we should assume that some of the population growth would be assimilated by the existing housing stock.

If we did take the new average occupancy figure of 2.21, then the new population could be accommodated by 71,687 homes. Even if we took a mid point figure, between 2.21, the projected overall occupancy level (from P4E figures) and the apparent occupancy P4E assumes for new stock, 1.04, i.e. 1.625, then there would be a need for 97,350 new homes.

Yet the housing land supply in P4E is estimated at 170,385 **before** Green Belt allocations. That gives **an excess of some 73,000 housing units**. Indeed, the sites identified as brownfield alone provide for an estimated 135,140 homes. Indeed, as Friends of Carrington Moss have noted,

“ even without the (20,000) green belt allocations, there is more than sufficient land supply (170,000) for every single expected additional member of our population (the increase of 158,200) to have their own home!”²²

Even if some of those sites turned out to be unfeasible, it seems unlikely that the additional population couldn't be accommodated there, particularly as some of the increasing densification of housing (e.g. building several houses on an existing housing plot, or extending existing houses to accommodate

²² <https://friendsofcarringtonmoss.com/2021/07/26/is-places-for-everyone-gmsf2021-the-right-plan-for-trafford-and-gm/>

additional family members, or to add flats) is not accounted for in the P4E projections.

We consider this grounds for GMCA to argue that it should not follow the standard Housing Need Methodology but instead apply one of its own, more appropriate to the characteristics of the GM population.

P4E identifies one location as a potential Green Belt withdrawal, the High Crompton Broad Location in Oldham. That land is not to be considered as a Green Belt allocation at this stage, awaiting demonstration that it is required. The same arrangement could be applied to most, if not all the allocations, rather than at this premature stage, assigning all of them.

We submit that the housing need projections are manifestly implausible. We acknowledge that this is a result of using the government's recommended methodology. However, when it was seen how absurd the figures were, GMCA should have made the case that an alternative method should be used. Indeed they did do something like this in the earlier stages of the GMSF process. We understand that there has not been a successful argument on exceptional grounds for using a different methodology but this should not mean that a competent authority then uses a methodology that it knows to give erroneous and absurd results.

We propose a recalculation of housing need based on plausible occupancy and population growth figures. However, there could be an uplift for the accommodation of climate refugees²³ (internal and international) over the plan period.

We also propose that any Green Belt allocations be given the same status as the High Crompton location. That will reduce the likelihood of developers opting for a *greenfields first* strategy and also reduce the risk of speculation and land banking.

Steady State Manchester, September 2021

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²³ The plan and associated documents appear to make no mention of this likely area of need.