

# FOCM MIQ Response – Matter 6



Friends of Carrington Moss  
Matter Number 6

## Matter 6 Sustainable and Resilient Places

### Policy JP-S1 – Sustainable Development

**Q6.1. a) Is the preference for previously developed land and vacant buildings justified and consistent with national policy? b) Is the policy effective in terms of how the preference for previously developed land and vacant buildings should be considered in determining planning applications or in the preparation of local plans?**

- a) NPPF paragraphs 11(a), 85, 119 and 142 highlight the importance of making “*as much use as possible*” of PDL and land that is well-served by public transport. The Policy could also reference the Government’s encouragement through funding to support the restoration and revival of such sites.
- b) To make this Policy more effective, it must be clear that it should be explicitly applied to Local Plans and all Allocations. In addition, given this Policy aims to help tackle climate change, it needs more emphasis on opportunities to meet the objective of sustainable development (in addition to utilising sustainable construction techniques). The Policy should give guidance about, for example, wetland areas (which may provide relief from localised flooding), irreplaceable habitats (which cannot be substituted by any amount of BNG) and the importance of sustainable passenger and freight transport options (which will reduce air, noise and light pollution, supporting health improvements for both people and wildlife).

**Word Count: 155**

### Policy JP-S2 Carbon and Energy

**Q6.2. a) Is the aim of delivering a carbon neutral Greater Manchester no later than 2038 justified and consistent with national policy b) Is there any substantive evidence that the requirements of policy JP-S2 would render development unviable?**

- a) In addition to NPPF paragraph 152 requirement to “*support the transition to a low carbon future*”, the [Climate Change Act 2008](#) establishes a legally binding target to reduce greenhouse gas emissions by 2050. GM’s 2038 carbon neutral aim will ensure real progress is made.

What is not consistent with national policy is the lack of “[robust and credible](#)” evidence that should support such an objective. Document 04.01.03 states (p27)

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that “To be found sound plans must include; an understanding of baseline carbon dioxide emissions within the council area, the emissions inherent in future development and how the council’s actions and policies will reduce emissions in line with this trajectory to net zero”. We do not believe this information is available.

There is no data, for example, about the carbon emissions implications of construction on GM’s peat mosses or the changes in land use as a consequence of the Allocations. We would also expect to see data about the cost of **not** restoring our peat mosses, including the economic implications of delaying peatland restoration.

Without making this data available, how is GM able to make assessments about the relative suitability of Allocation sites for construction/development? An assessment should have been completed that clearly sets out the impact each Allocation will have on GM’s carbon emissions, incorporating those that accrue from the change of land use and including the loss of carbon sequestration capacity, together with an assessment of the expected additional carbon emissions that arise from the development itself.

In addition, the long-term impact of development cannot be captured unless the life cycle cost and carbon assessment tools are comprehensive and incorporate emissions resulting from (for example) development/construction on a peat moss. Such tools should also feature the benefits of nature-based solutions to enable a full suite of options to be assessed.

Furthermore, document 02.01.02 confirms (within the 2020 Updated Position for New Carrington, page 63) that this Policy (referred to as GM-S2) does not explicitly refer to climate change. We agree that this is a huge gap and whilst the GMCA has introduced a short section (Plan, page 84) which provides a few brief paragraphs under the heading “*Addressing Climate Change*”, this is woefully inadequate given the importance of supporting national, regional and local action plans when executing this Plan and that it is the spatial expression of the Greater Manchester Strategy.

Finally, we would have expected to see some prominence of the potential for public buildings providing suitable locations for renewable energy schemes.

b) Please see our response to (a) above. We have real concerns that the “evidence” related to carbon emissions is inadequate so cannot be used to determine whether development would be unviable.

The Plan (paragraph 5.9) refers to the RTPI Report [Settlement Patterns, Urban Form & Sustainability \(May 2018\)](#) in suggesting that “*new development also enables carbon reduction through the delivery of sustainable patterns of growth*”.

That [document](#) (page 30) states “*settlement patterns and urban forms play an important role in making emissions reductions in the transport sector. As described in sections 3.5 and 3.6, this requires the concentration of large-scale mixed-use new development **within existing settlements, the prioritisation of urban brownfield over peripheral greenfield sites, investment in walking and cycling infrastructure, and high frequency bus and rail connections between settlements.** Development phasing should ensure that public and active transport infrastructure is in place **before** new houses and businesses are occupied, as the preference for car-based travel is difficult to change once established, even with major investment in new infrastructure.*”

This is not what is planned for the Allocations, the vast majority of which are on green belt, are not in sustainable locations and the commitments in the Transport Strategy do not prioritise sustainable passenger and freight transport options.

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The Plan goes on (paragraph 5.9) to assert that such growth can support “*nature based solutions to sequester carbon, which also provide multi-benefits.*” Yet, in addition to lacking most other essentials of sustainability, the Allocations plan to decimate some of GM’s peatmosses.

**Word Count: 666**

**Q6.3. Is criterion 4 of policy JP-S2 justified and consistent with national policy, particularly NPPF 209-217 on facilitating the sustainable use of minerals? b) Are issues of mineral extraction within the scope of the Plan and would the criterion form an effective basis for determining planning applications and/or preparing district local plans?**

- a) Whilst we wholeheartedly agree with criterion 4 of this Policy, it would be helpful to have a specific Policy dedicated to Minerals and how this Plan relates to [GM’s Joint Minerals Development Plan](#). The new Policy should draw attention to NPPF paragraphs 210(a) and 211(d) which relate to sites for peat extraction. A full moratorium on the disturbance of peat should be confirmed in the Policy.
- b) The new Policy suggested at (a) above should incorporate effective advice for determining planning applications and/or preparing district local plans.

**Word Count: 88**

**Q6.5. Is criterion 6 of policy JP-S2 justified and effective? In particular, how is the objective of increasing the range of nature-based solutions, including carbon sequestration through restoration of peat-based habitats, woodland management, tree planting and natural flood management techniques intended to be taken into account in the determination of planning applications and/or the preparation of local plans?**

There is a huge gap (both in the Policy itself and in its associated documents) relating to the objective of increasing the range of nature-based solutions but we note that the Plan (paragraph 5.5) confirms that GM’s vision is to be “*at the forefront of action on climate change*”. With this in mind, the Policy should be significantly strengthened and, given the GM Strategy, GM’s 5-year Environment Plan and the Government’s Peat Action Plan, should include (as suggested in 6.3(a) above) a complete moratorium preventing any construction on GM’s peat mosses. These irreplaceable habitats, including those impacted by the Allocations, should be protected for restoration.

**Word Count: 105**

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## Policy JP-S4 – Resilience

**Q6.12. Are all criteria in policy JP-S4 justified, consistent with national policy and effective? In particular, are each of the criteria clear and unambiguous so that it is evident how a decision maker should react to development proposals and/or how they would be used in the preparation of district local plans?**

Section 14 of the NPPF provides guidance in relation to Policies that focus on resilience. Paragraph 153, for example highlights that “*Plans should take a proactive approach to mitigating and adapting to climate change*”. Whilst the measures set out in the Policy support the achievement of that guidance, the Policy should be strengthened further, particularly to:

- confirm that it must be comprehensively adhered to by the Allocations and any future Local Plans and/or planning applications
- include the protection and restoration of GM's peatlands (peatlands are vital in the transition towards a low-carbon economy, in the prevention of catastrophic repercussions from extreme weather events and they are also essential to GM's efforts to combat climate change and achieve resilience)
- in relation to flood risk (criterion 8), given the document acknowledges that climate change is “*expected to significantly increase peak river flows and surface water run-off as a result of more intense rain events*” (paragraph 5.33), development should not be approved in areas that are subject to anything other than the lowest risk of flooding

The Plan should increase GM's level of resilience and reduce vulnerabilities, yet some of the Allocations include areas that already do regularly have high levels of surface water flooding. The Plan should provide details of which alternative locations were considered and why they were excluded. Any Allocation that does not meet the requirements of this Policy should be withdrawn from the Plan.

**Word Count: 235**

## Policy JP-S5 Flood Risk and Water Environment

**Q6.16. Is the proposed modification to the first sentence policy JP-S5 necessary for soundness?**

The Policy should confirm which organisation is expected to carry out the “*development management*”.

The words “*where practicable*” and “*wherever possible*” should be removed as they add ambiguity to the Policy.

**Word Count: 31**

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## Policy JP-S6 Clean Air

### **Q6.17. What, if any, effect will the review of the Clean Air Plan have on the spatial strategy or scale of development proposed in the Plan?**

It is impossible to determine what effect the review of the Clean Air Plan will have on the spatial strategy or the scale of development as it has not yet been communicated to residents and there is no detail on the [GM Clean Air Plan](#) (CAP) webpage. It is not clear, for example, whether the GM CAP will reference the [Air Quality targets](#) set out in the Environment Act.

That website states that “*participatory policy development will take place with key stakeholders to develop and shape the new Clean Air Plan Policy*” but those impacted by the Allocations in the Plan (who should be considered to be key stakeholders) have not been contacted.

The Allocations should be removed from the Plan until their impact can be fully considered against the objectives in the revised Clean Air Plan.

**Word Count: 137**

### **Q6.18. Are the proposed modifications to criterion 6, paragraphs 5.48 and 5.49 and paragraph 10.14 necessary for soundness?**

Criterion 6, and paragraphs 5.48 and 10.14 should reference adherence to the [Air Quality targets](#) set out in the Environment Act.

Paragraph 5.49 should confirm that all Allocations are expected to adhere to the Policy.

**Word Count: 35**

### **Q6.19. Is policy JP-S6 justified, consistent with national policy and effective? In particular:**

- In criterion 2, expecting development to be in accordance with guidance published jointly by the Institute of Air Quality Management (IAQM) and/or Environmental Protection UK;
- In criterion 3, requiring appropriate provision for future monitoring of air pollution;
- In criterion 4, restricting and regulating developments that would generate significant source point pollution. Is this consistent with NPPF 188?

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- In criterion 5, significantly expanding the network of electric vehicle charging points, having regard to changes to Building Regulations and policy JP-S2;

Given the [increasing evidence](#) about the impact of air pollution on the health of both people and wildlife, it is important that this Policy fully complies with NPPF paragraph 186 and that it is strengthened to encompass the [Air Quality targets](#) set out in the Environment Act.

The Plan also needs to provide evidence relating to the current and predicted levels of air pollution (including for the specific Allocations). Without this information, it is not possible to determine whether schemes are likely to breach national air quality objectives.

The Policy sets out (criterion 10) that GM is aiming to promote *“actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants”*. This should be significantly strengthened to include nature-based solutions and a complete moratorium, preventing any construction on GM’s peat mosses. If restored, the region’s peat mosses would provide a strong nature-based solution to significantly support Policy JP-S6. The Policy states (page 100) that *“A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met”* yet there are no actions which indicate that there will be an increased focus on the measurement of air pollution, particularly in those areas highlighted in the Policy itself.

There is currently insufficient air quality monitoring and that is apparent from the lack of data provided as evidence to this plan. Residents can only be given some responsibility for tackling air pollution if they have access to information about the levels of pollutants in their areas and they understand how they are contributing to the problem, so the Policy needs to address information sharing with the public.

Availability of clear measures will also be important to achieving the WHO ‘BreatheLife City’ status by 2030 (paragraph 5.44), which means that the region will need to considerably extend its air quality monitoring regime.

We note document 02.01.01 suggests (page 121) that GM’s Transport Strategy predicts that *“there will be an additional 600,000 trips on the GM transport network everyday by 2035”* and the document further comments (page 135) that *“transport is now the largest sector emitting greenhouse gas emissions”*, whilst confirming (page 134) *“road is the major means of freight movement in the UK and HGVs are significant contributors to carbon emissions”*.

Whilst criterion 7 of the Policy (page 101) mentions the facilitation of more sustainable distribution of goods within the urban area, there is no action to propose modal change for freight traffic, from the road to other, more sustainable, forms of transport (rail or shipping) to reduce the elevated levels of air pollution caused by HGVs.

Finally, the Transport Locality Assessments do not provide detailed traffic level information that makes the impact of the Allocations on air pollution, either individually or in total, clearly understood. Data should be provided that confirms the current traffic (both cars and HGVs), traffic that will accrue from planning applications that have already been approved in the Allocation areas and traffic that will be generated by the Allocations themselves. Without this detailed information, it is impossible to fully assess the impact of the planned Allocations on air pollution in the GM region.

**Word Count: 557**

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**Total Word Count: 2,009**

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss