

# Places for Everyone Modifications Consultation Response

## Friends of Carrington Moss



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### Integrated Assessment

In our original response, we highlighted many issues with the Integrated Assessment. We do not believe the planning inspectors gave sufficient weight to our concerns about the lack of rigour in the IA approach.

Planning Practice Guidance (Paragraph: 019 Reference ID: 11-019-20140306) states that “*An environmental report for the purpose of the regulations must identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and of the reasonable alternatives, taking into account the objectives and geographical scope of the plan. The sustainability appraisal report will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects*”.

One of the Assessment Criteria set out in document 02.01.09 (page 224 relates to promoting a proactive reduction in emissions across GM. The IA suggested that this objective is not considered to be relevant for site selection. Given that legislation (the Planning and Compulsory Purchase Act 2004) requires that “*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*”, it is hard to conclude that a proactive approach to mitigating and adapting to climate change and achieving radical carbon reductions in line with national policy (among others NPPF 152, 153, 154), and to support the achievement of GM’s 2038 Carbon Neutral Target, can be realised when this criteria was not considered when assessing the sites to be allocated.

Sadly, we continue to have more concerns about the IA in the documentation issued as part of the Modifications Consultation.

Plan Objectives 2 and 3 aim to “*Prioritise the use of brownfield land*”. Document MDC6 (page 18 pdf/20 document) states that “*Policy JP-Strat 6 – Northern Areas and Policy JP-Strat 9 Southern Areas have been amended from prioritising the re use of brownfield land to ‘making as much use as possible of suitable previously-developed land’ to make as much use as possible of suitable previously-developed (brownfield) land through urban regeneration. The added policy text **strengthens** ~~to~~ [the] requirement for using previously developed and therefore the scoring has changed to very positive against Objective 17*”. A similar modification has been made for Policy JP-S1 – Sustainable Development.

Removing the word “*prioritising*” and substituting it with “*making as much use as possible*” is not a positive change and the policy no longer reflects the plan objectives, something the IA should be specifically testing. This change does not strengthen the policy and will have significant environmental implications. It means that previously developed land will no longer be the priority for development, contrary to paragraph 1.44 of the plan.

There is an expectation that the plan will comply with national policy, so, whilst we recognise the wording is from NPPF paragraph 119, there is no need, for soundness purposes, to make this change to match national policy. The revised wording weakens the policies, is not compliant with Plan Objectives 2 and 3 (nor paragraph 1.44) and puts more Green Belt land at risk, making the plan ineffective and unsound.

Overall, the updated IA is highly optimistic and appears to ignore serious issues that should have been raised in the assessment. Scoring is often increased without the necessary evidence to justify such a change. We provide further examples in the paragraphs below.

MDC6 concluded (page 8) that “*It should be noted that no amendments have been proposed to PFE’s vision and objectives as part of this process. Therefore, as part of this process it has not felt appropriate to re-assess these as the previous IA assessments of the plan’s vision and objectives still stand.*”

We do not believe this is a sound decision because there have been a number of significant changes set out in the modifications which impact that vision and the objectives, including the following examples:

1. The plan has been modified to remove the reference to prioritising brownfield land (which is explicitly set out in Plan Objectives 2 and 3)



2. The plan has been modified to remove from policy the 'target' for Affordable Housing (which significantly weakens the policy and impacts Plan Objectives 1 and 5, this policy is discussed in more detail in our response to the EQIA)
3. The Peat Pilot Report (OD36) highlighted the importance of peatland restoration to the achievement of the 2038 carbon neutral target, this issue significantly impacts Plan Objective 7, has not been tested in any of the iterations of the IA and should be considered to make any allocation with restorable deep peat unsound
4. The removal of 31 Green Belt Additions from policy has resulted in an increase in the net loss of Green Belt of over 500 hectares (and neither the plan nor the IA mentions the 85 hectares of Green Belt "orphans" that are to be released in addition to the allocation areas)
5. The proposed modification to criterion 8 of JP-S2 (Carbon and Energy) introduces a 'get out of jail' clause for developers by stating that the requirements do not have to be fulfilled if *"it can be demonstrated that it is not practicable or financially viable"*, this is a significant weakening of the policy that will put the 2038 carbon neutral target (and Plan Objective 7) at greater risk of failure.

Despite these (and other) major changes (highlighted in the paragraphs below), the updated IA has not assessed their impact on the achievement of the Vision or the Plan Objectives, which makes the IA ineffective, unjustified and unsound. We believe this indicates that further work is needed to adequately assess the impact of the modifications.

Given that the plan repeatedly highlights that it is focused on delivering the ambitions of the Greater Manchester Strategy, it is anomalous that there is not more emphasis in the IA on its key issue (putting the *"climate and equalities agendas at its heart"*).

In addition, whilst MDC6 (page 13) states that *"It is considered unnecessary to undertake a further round of assessment of reasonable alternatives of the Plan's growth and spatial options. This is because the proposed main modifications, as shown in the 2023 PfE Composite Plan, are felt to not impact the growth and spatial option strategies of the Plan"*. GM's choice of Growth and Spatial Options was agreed prior to the declarations of a climate emergency and the Net Zero target and was aligned with the delivery of HS2 and the associated infrastructure. Given the ambitions of the Greater Manchester Strategy, the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, those Growth and Spatial Options should be reviewed. As a minimum, the IA should be updated to address all the responses received to this consultation and should fully assess the impact of the cancellation of HS2. In addition, the Public Transport Max Spatial Option could now take advantage of funding previously allocated to HS2, making it a very attractive alternative that should be fully reconsidered.

The updated IA notes (MDC6 page 12) that *"Consideration has been given to the proposed Green Belt additions as to whether reasonable alternatives would be required to be considered as part of the IA. However, the proposed additions were felt to be minor when viewed against the Greater Manchester Green Belt as a whole, therefore it was not deemed to be required."* This is a rather astounding decision given that the removal of 31 Green Belt Additions sites from policy resulted in an increase in the net loss of Green Belt of over 500 hectares, making this a material change to the plan. There has been no consideration of the identification of alternatives to reduce this increase (which should have been subject to a consultation, especially given the way in which the changes were introduced during an Examination Hearing).

MDC6 (page 21) in relation to **Policy JP-S2 – Carbon and Energy** states incorrectly that *"Policy text has been added with a requirement to work towards net zero carbon, including calculating unregulated emissions from 2025. The added criterion references all emissions, to clarify the approach to net zero development. Therefore, the scoring has increased to positive in the short term and very positive in the medium and long term against Objective 10."*

- Firstly, the GMCA's proposed modification was reversed by the planning inspectors, so it now no longer refers to *"work towards"* (for information, MDC9 has the correct wording but MDC10 does not)
- Secondly, the policy has been significantly weakened by the inclusion of the words *"unless it can be demonstrated that it is not practicable or financially viable"*. The assessment of this policy commences on page 71 of MDC10. The incorrect wording mentioned above has been used in many of the assessment objectives and the weakening of the policy is not reflected in the scoring



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- Thirdly, there is no mention anywhere in the assessment of the need to reflect the requirement for 50%-75% of peat mosses to be restored to achieve the net zero target. This was not covered in any of the previous IA documents and should have been addressed given the discussion at the Peat Hearing and the confirmation that GM's own modelling resulted in this requirement.

In terms of the presence of deep peat in some of the allocation sites, this has not been adequately considered in the Plan, either in site selection or in the Integrated Assessment. No changes were proposed despite the IA supposedly considering the Government's England Peat Action Plan in 2021. Neither did the IA updated for this modifications consultation address the inclusion of the Peat Pilot Summary to the Examination database in June 2023.

The Peat Pilot Summary (OD36) explicitly mentioned (page 6) that "*Greater Manchester has set a target of net carbon neutrality by 2038. Modelling currently used by Greater Manchester Combined Authority (GMCA) suggests that 50-75% of peatland in the city region will need to be restored in order to achieve these targets, but this modelling may significantly underestimate the role of peat in net emissions budgets*". In addition, the number one priority in GM's 5-year Environment Plan is to manage land sustainably, including key policies such as planting millions of trees and restoring 50–75 percent of the peatland in the conurbation. Yet, the IA did not reflect the importance of peatland restoration to the achievement of the 2038 Carbon Neutral Target in its scoring.

Furthermore, a significant flexibility allowance has been added to housing land supply and a 65% buffer has been added to the Gross Need figure for warehousing land supply. Both of these unnecessary increases facilitate the release of Green Belt sites in isolated locations. This approach will significantly increase traffic movements across the region, particularly for HGVs because there has been no accompanying requirement to provide sustainable freight transport options. PfE will, with its huge volume of development and the associated significant increase in motor vehicle traffic, substantially increase carbon emissions for GM, contrary to its own aspirations. Yet, the plan does not propose any carbon targets linked to the required housing and employment developments, rather, as mentioned above, it has radically weakened the JP-S2 policy.

None of these issues are picked up in the IA, despite the GMCA's own documentation highlighting that GM is behind where it needs to be to achieve the 2038 Carbon Neutral Target (see <https://aboutgreatermanchester.com/media/kedllu/jt/gms-progress-report-july-2022.pdf> and <https://democracy.greatermanchester-ca.gov.uk/documents/g4966/Public%20reports%20pack%2022nd-Mar-2023%2013.00%20GMCA%20Overview%20Scrutiny%20Committee.pdf?T=10>).

This means that PfE, which now covers the period 2022-2039, MUST include policies that drive the achievement of that 2038 Carbon Neutral Target, rather than planning to fail it. The inclusion of allocations in isolated locations, on deep peat and/or land which supports the mitigation of climate change cannot be considered to be sustainable nor supportive of this important aspiration but will substantively undermine it.

In another example, in relation to Figure 3.1 Key Diagram (p44 of the Composite Plan), we can find nothing in the updated IA that tests the importance of Stockport to the achievement of the strategy for the southern areas, despite the statement at paragraph 4.21 of the plan confirming that Stockport "*will play a vital role*". The previous IA (Document 02.01.05) reviewed the impact of the withdrawal of Stockport but concluded (for sites in the southern area) that "*the policy would perform the same against the IA Framework*". This makes assumptions that should be tested. PfE is, for example, pre-empting Stockport's consultation with the Key Diagram, which suggests that Stockport has a role in meeting the PfE objectives. Given Stockport's important role in sustaining southern competitiveness, the impact of that district deciding to adopt a different growth strategy and/or alternative targets to those set out in PfE should have been reviewed in the updated IA.

MDC6 (page 17) highlights that "*Ten thematic policies within the Strategy Chapter were re-assessed. A number of the strategic thematic policies removed the specific number of identified available land supply and instead moved this to the reasoned justification text. Whilst reference to the specific number has been removed from the policy, it is considered that these policies do not change against the assessment criteria when the plan is read as a whole, as the wording remains in the reasoned justification text. Therefore, the scoring has not changed against Objective 1 or 2*".



We disagree with this assessment. Firstly, these modifications introduce inconsistencies between the policies delivering on Green Belt and those delivering on brownfield.

Secondly, it is incorrect to suggest the policies do not change against the assessment criteria. Relegating the numbers to reasoned justification means they no longer have to be achieved as they are no longer in policy (unlike the targets for delivery of Green Belt developments). This reduces the likelihood of the level of brownfield development being delivered, contrary to the Plan Objectives and significantly weakening the policies. Should this result in more Green Belt having to be released, there would be significant environmental consequences that should have been assessed in the IA.

MDC6 (page 19) states that “**Policy JP-Strat 4 – Port Salford** has been amended with added text stating “*the growth of Port Salford will be managed to reflect the creation of additional capacity in the transport network and in accordance with the requirements of policy JPA29. The added policy text **could** ensure that employment land is well connected and well served by infrastructure and therefore has the scoring increased against Objectives 2, 3 and 9*”.

Increasing the scoring on the basis of the word “*could*” is not effective or sound as there is no evidence to demonstrate the likelihood of the change becoming probable rather than possible! The same decision has been made for:

- **Policy JP-S5 – Flood Risk and the Water Environment** which states “*The added wording **could ensure** new developments are resilient to climate change. Therefore, the scoring has increased against Objective 12, 13, 14 and 18.*”
- **Policy JP-S6 – Clean Air** which states “*The added criteria **could contribute** to improving air quality within Greater Manchester. Therefore, the scoring has increased to very positive in the long term against Objective 10.*”
- **Policy JP-C6 – Freight and Logistics** which states “*It was considered that the added criterion supports infrastructure improvements that **could** ensure safer driving conditions. Therefore, the scoring has increased from neutral to positive against Objective 6 and from positive to very positive against Objective 3*”.

MDC 6 (page 22) **Policy JP-S6 – Clean Air** states “*In addition, policy text has been amended to reference the Clean Air Plan, replacing the Clean Air Zone which is under review. This has not had an impact on the scoring against Objective 10*”. Yet, Greater Manchester does not have a Clean Air Plan. This document should, therefore, have highlighted that criterion 6 of the policy cannot be assessed until the Clean Air Plan is published. “*Implementing the **Clean Air Plan** and associated measures*” currently requires communities and developers to agree to a plan they have not seen. This introduces a level of risk given its predecessor was very controversial with over 80,000 residents objecting to the charging zone.

MDC6 (page 25) states “**Policy JP-H4 – Density of New Housing** has been amended to include the requirement to achieve efficient use of land however, no amendments have been made to the policy text which considers previously developed land. Therefore, the scoring remains the same against Objective 17”. Yet, the IA does not mention nor consider the lack of evidence about the expected density in the Strategic Housing Land Availability Assessments meaning that it is not possible to assess whether this policy is effective.

MDC6 (page 25) in relation to **Policy JP-G2 – Green Infrastructure Network** does not make any reference the relegation of the Green Infrastructure Opportunity Areas to reasoned justification. These areas are an important consideration for planning and their removal significantly weakens the policy.

MDC6 (page 26) in relation to **Policy JP-G9 – Biodiversity and Geodiversity** increases the scoring to very positive against Objective 11 in the medium to long term, yet there is no evidence showing how this will be achieved, making the change not justified or sound.

The assessment of **Policy JP-C7 – Transport Requirements of New Development** (MDC6 page 28) is extremely optimistic given that there is no mention of the deliverability of Appendix D and no evidence of how the new criterion (relating to the Manchester Mosses SAC) can be measured. The assessment is not justified or sound.





Given the latest iteration of the IA only considered changes to policies, there are gaps in the assessment, in addition to those mentioned above relating to the importance of peat to the carbon neutral target. As an example, we believe that the new paragraphs introduced into the reasoned justification for JP-C7 should have been included in the policy. To be sound, the IA should, therefore, be updated further to take these gaps into consideration.

### New Carrington Integrated Assessment

The IA for New Carrington is as deficient as the assessment for the thematic policies. Neither the original scorings (which we raised in our original response) nor the revised scorings (which we highlight below) have been assessed adequately, given the existing land use and the level of development (housing, warehousing and roads) proposed in the area.

One of many flaws in the IA is the lack of consideration of the importance of peat as a natural capital resource providing many ecosystem services, supporting climate mitigation and, in particular, supporting the achievement of the 2038 Carbon Neutral Target.

The [SEA requirements checklist](#) states that the report “*shall include such of the information referred to in Schedule 2 as may reasonably be required*”. Point (f) of the list highlights that the likely significant effects on the environment should be recorded, including on issues incorporating, among many other natural capital assets, “soil”. The criterion continues that these effects “*should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects*”. The checklist does not appear to have been followed. The assessment was, therefore, inadequate. Given the significance of the peat deposits at New Carrington, we do not believe the GMCA has taken appropriate steps to ensure that the impact of construction on deep peat was evaluated within the IA and the lack of consideration of the environmental impacts of the decision to allocate land which hosts large quantities of deep peat can be considered to be **irrational** (see our attached document New Carrington Justification for information on the implications of this).

PPG (paragraph: 005 Reference ID: 11-005-20190722) confirms that a “*sustainability appraisal should be prepared for any of the documents that can form part of a local plan, including core strategies, site allocation documents and area action plans*”. The New Carrington allocation included a masterplan document (10.09.06) - which might be considered similar to an area action plan - there was no specific IA prepared for that document.

Furthermore, all the original scoring for the four IA Objective 11 criteria are inexplicably very high (++). The previous update to the IA (02.01.01, page 7) referenced the importance of peat and consideration of the Government’s England Peat Action Plan (2021). Yet, the scoring for the allocations which have a presence of deep peat, including New Carrington, did not reflect the contents of that document. Given the number one priority in GM’s 5-year Environment Plan is to manage land sustainably, including key policies such as planting millions of trees and restoring 50–75 percent of the peatland in the conurbation, the IA should have reflected this in its scoring.

In relation to the presence of deep peat on the New Carrington allocation site, the Peat Pilot Summary (OD36) explicitly mentioned (page 6) that “*Greater Manchester has set a target of net carbon neutrality by 2038. Modelling currently used by Greater Manchester Combined Authority (GMCA) suggests that 50-75% of peatland in the city region will need to be restored in order to achieve these targets, but this modelling may significantly underestimate the role of peat in net emissions budgets*”.

Given the specific peat Hearing during the Examination, the addition of the Peat Pilot Summary (OD36) to the Examination database, and the new policy criterion (to be added after criterion 32 in the JPA33 policy), the scoring should have been corrected in the updated IA. Yet, the scoring remains inexplicably very high (++), meaning the IA lacks credibility and integrity, making it ineffective and unsound.

Looking at the IA in detail, we tested 3 IA Objectives for a recognition of the importance of peat as an irreplaceable habitat and in relation to the achievement of the Net Zero target for GM, including for the Growth & Spatial Options, the thematic policies and the allocations.



We provide examples of our analysis in relation to the New Carrington allocation IA below:

**IA Objective Assessment Criteria: IA 11** – *Avoid damage to or destruction of designated wildlife sites, habitats and species and protected and unique geological features.*

**New Carrington Scoring:** Document 02.01.03 p662 ++(2019), ++(2020). Document MDC11 page 172 ++(2021), ++(2023). No mention of peat or impact on irreplaceable habitat in 02.01.03. Peat is mentioned in MDC11 but damage/destruction is not reflected in the scoring.

**Commentary:** Loss of deep peat as an irreplaceable habitat and a natural capital resource for ecosystem services is not reflected in scoring.

**IA Objective Assessment Criteria: IA 15** – *Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM.*

**New Carrington Scoring:** Document 02.01.03 p663 0 (2019), ++(2020). Document MDC11 page 174 ++(2021), ++(2023). Like many of the other assessments, the scoring increased in 2020 **for consistency between allocation policies** (this is inappropriate given that other sites do not have deep peat that can support this objective).

**Commentary:** Recognises peat impact on carbon storage in 2023 but the importance of restoring 50-75% of GM's peatlands and the impact of damaging/destroying the peat moss on 2038 Carbon Neutral Target is not reflected in scoring.

**IA Objective Assessment Criteria: IA 17** – *Protect the best and most versatile agricultural land/soil resources from inappropriate development.*

**New Carrington Scoring:** Document 02.01.03 p664 --(2019), --(2020). Document MDC11 page 174 --(2021), ++(2023). Loss of Grade 2 Agricultural Land recognised up to 2021. Reasoning for huge change to very positive given as “*Policy wording added that explicitly protects soil resources from inappropriate development*”. This is incorrect, the new policy wording does not prevent inappropriate development and both peat soils and best and most versatile agricultural land **WILL** be lost to development if the allocation goes ahead as currently proposed.

**Commentary:** Loss of Grade 2 agricultural land and peat soils no longer reflected in scoring. Very positive 2023 score does not reflect the actual wording in the new paragraph.

We do not believe the importance of peat as a natural capital resource providing many ecosystem services, supporting climate mitigation and, in particular, supporting the achievement of the 2038 Carbon Neutral Target has been adequately considered within the any iteration or element of the IA.

The lack of understanding of the plan's influences on the achievement of the 2038 Carbon Neutral target began in earlier phases of the planning process and is clearly shown in Table 10 (IA Compatibility Analysis with the 2020 draft GMSF Objectives), page 40 document 02.01.03 and Table 11 (Thematic policies and corresponding IA objective) in the same document. No links were made, for example, between the peatland thematic policies (JP-G4 and JP-G5) and IA objective 15 (reduce greenhouse gas emissions).

It should be no surprise, therefore, that the scoring in the IA does not reflect the likely plan outcomes (ie the loss of peatland habitats means a loss of carbon reduction opportunities and an inability to meet the 2038 Carbon Neutral Target). The plan **does not identify any peatland to be restored**. In fact, despite covering 9 districts, the plan does not designate any sites to be developed for environmental improvement purposes, including nature's recovery, over the whole 17-year period. This is not identified as a gap in policy in the IA.

In addition, in terms of site selection, there is inadequate reasoning to demonstrate why other locations were rejected in favour of sites with deep peat, such as New Carrington, particularly given their importance to meeting the 2038 Carbon Neutral Target.



If the IA for JPS2, for example, had included peatland restoration as one of its assessment criteria, this would have played a crucial role in the site selection process. In fact, the IA does not support the judgement related to site selection or sites being retained within the plan following Examination, because it does not expose the harm to the 2038 Carbon Neutral Target by proposing to develop on deep peat, despite the introduction of OD36 and other analysis available to the GMCA.

Community representatives specifically asked (in the IA Hearing) if any quantitative analysis had been undertaken. Arup informed the Hearing that it hadn't because it's so difficult to do. Yet, the GMCA clearly has done this via the SCATTER modelling. Given the issues that have come to light, these models should not have been withheld from communities. The data is not just important to the allocations, but also to confirm that the spatial option that has been chosen can deliver the GM net zero target.

In order to enable a detailed review of the criteria within the policies, and the site selection criteria, the planning inspectors should have requested that the GMCA make the SCATTER modelling available on the Examination database. We now know (from the Peat Pilot Report) that SCATTER identified that the Carbon Neutral Target is dependent on at least 50–75% of peat being restored. We also know from the GMCA Scrutiny Committee report that SCATTER has identified that the thematic policies are not in place to deliver net zero by 2038. The IA did not pick up either of these flaws.

As discussed at the Examination Hearing, the New Carrington allocation includes brownfield land that already has planning permission and is not subject to the policies in this plan. Yet, there is no differentiation between the various parts of the plan area in the New Carrington IA.

IA Objective 2, for example, criteria *“Provide sufficient employment land in locations that are well-connected and well-served by infrastructure”* states (in the Summary of 2023 scoring) that *“The allocation has been rephrased and has added wording that signposts to Policy JP-C7 and Appendix D. However, the scoring is already positive and so the scoring remains the same”*. The explanation column states that *“The site is adjacent to a number of existing bus stops”*.

The area that is *“adjacent to a number of existing bus stops”* is the brownfield part of the allocation, where the majority of the sites already have planning approval and do not have to comply with the policies in this plan. The Green Belt area (which appears not to have been assessed for this criterion) currently only has access for walking, cycling and horse riding.

Conversely, IA Objective 17 specifically assesses whether the allocation supports *“the development of previously developed land and other sustainable locations”*. The Explanation column suggests the land is *“Mainly urban/brownfield land, with some greenfield”*. This is totally incorrect. The land that does not yet have planning permission is mainly Green Belt, with a small amount of brownfield. The allocation area is not a sustainable location (recognised by Trafford). Yet, the scoring is, once again, incredibly positive.

This lack of distinction between the different parts of the site and the inappropriately positive assessments for the Green Belt areas which DO need to comply with the policies in this plan, makes the IA ineffective and unsound.

The IA also does not take into consideration the lack of committed funding to deliver Appendix D and has scored a number of the IA objectives extremely positively despite our evidence (via a response to an FOI request) which stated that there *“are currently no committed schemes to improve public transport in this area”*.

Some of the assessment objectives refer to paragraphs that have now been removed from policy. The revised IA does not reflect this (for example, IA Objective 4 *“Reduce the proportion of people living in deprivation”* refers to Local Labour Agreements but this JPA33 policy criterion has been totally removed. This not only makes the assessment ineffective because these references have not been removed from the IA, the policy itself is weakened, and that should have been reflected in the scoring (ie reduced the positivity).

The requirement to deliver ‘targets’ for affordable housing, including genuinely affordable housing, have been removed from the JP-H2 policy. This significant weakening should be reflected in the IA scoring for IA Objective 5 *“Ensure equality of opportunity and equal access to facilities / infrastructure for all”* but it remains a ++. Again, demonstrating that the IA is ineffective and unsound.





In another clear example, of poor scoring and a lack of consideration of the issues which have been raised since the original IA, IA Objective 5 *“Ensure that the needs of different areas, (namely urban, suburban, urban fringe and rural) are equally addressed”* states that *“Each allocation is within a specific location and therefore is within one area type”*. This is incorrect. In relation to New Carrington, for example, not only are there various area types, but, as mentioned above, some of the land in the allocation area is not even subject to the policies set out in this plan.

The prioritisation of walking and cycling has been removed from policy, weakening the policy and the intention to support healthier lifestyles. This should have been reflected in the IA scoring of IA Objective 6 *“Support healthier lifestyles and support improvements in determinants of health”* especially given that it is mentioned in the Explanation column. The inappropriate (given the level of air, noise, light, vibration and water pollution that will be caused by this plan) and very positive scoring inexplicably has not changed.

That same IA Objective also references, in the Explanation column, *“new green spaces”*. This is incorrect, there are no new green spaces. The existing green space will be radically reduced. The proposal will result in the huge loss of peat moss, Grade 2 agricultural land, woodland and wetland habitats. There will also be a huge impact on SBIs/SSSIs. There is no indication of the principles of the compensation to be provided for the loss of an irreplaceable habitat and no indication of where the 2:1 loss of thousands of trees will be located. Yet, this IA Objective scores a ++.

The scoring for IA Objective 7 (Ensure access to and provision of appropriate social infrastructure) also remains inexplicably high. Offsite school provision is unsustainable and means significant levels of increased traffic on local roads. The removal of the policy text referencing health facilities also weakens the policy. Yet these issues are not reflected in the IA scoring.

The scoring for IA Objective 9 (for all three assessment criteria) does not reflect the removal of the prioritisation of walking, cycling and using public transport.

The scoring for IA Objective 10 (Improve air quality) does not reflect that Appendix D does not include any sustainable freight options and prioritisation of active travel and public transport has been removed.

As mentioned above, the IA Objective 11 criteria are scored inexplicably highly despite the huge loss of ecology-rich assets, the huge increase in traffic volumes (coupled with the associated air, noise, light, vibration and water pollution) and human/domestic pet footfall (which will impact species populations, including endangered/protected species). In addition, much of the remaining Green Belt is privately owned and used by commercial/sporting businesses and is, therefore, not accessible by the general public. This is not reflected in the scoring.

The scoring of IA Objectives 12 and 13 relating to climate change and flood risk (despite being lowered to reflect the changes in policy) are incredibly positive given the loss of the huge water storage capacity of Carrington Moss (which becomes a lake every year), the lack of sustainable freight transport (the plan could have required the reopening of the former railway lines, the use of the Manchester Ship Canal or the use of pipelines, rather than significantly increasing the number of HGVs on local roads), the lack of confirmed funding for sustainable passenger transport and the proposed huge increase in road traffic, increasing both carbon emissions and pollution. The water that is currently stored on Carrington Moss will have to go somewhere, this is likely to increase flood risk for surrounding (and downstream of the Mersey/Sinderland Brook) communities.

The positive scoring for Objective 16 *“Improve landscape quality and the character of open spaces and the public realm”* is unreasonable and illogical. The impact of the warehousing, in particular, will be impacted by the lack of height limits set out within the policy, which the IA should have recommended. This has been made clear by a recent planning application that has been received for the brownfield area within JPA33, adjacent to the Green Belt. The mosslands are characterised by the flat landscape and long views but the developer wants to completely fell a woodland site of biological importance and replace those trees with a 22m high warehouse. This will be visible right across Carrington Moss and is indicative of the inability of the developments proposed to meet this IA criterion.



### The Equalities Impact Assessment

MDC8 (Appendix A EQIA) states (page 5) that the “*EqIA is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010*”. Yet, neither the IA nor the EQIA highlights the equality issues that are consequential to the subordination of the affordable housing ‘targets’ to reasoned justification and District Local Plans. In fact, MDC 6 states that (in relation to the modification MM7.5), “*the scoring is already very positive and so the scoring remains the same against Objective 1*” but there is no reference to the impact on IA objectives 4 or 5 (nor to Plan Objectives 1 and 5).

This PfE plan now focuses only on the delivery of market housing and warehousing, despite repeatedly asserting that the plan aims to deliver the ambitions of the Greater Manchester Strategy. Paragraph 9.1 of the plan states that “*Delivering a more inclusive Greater Manchester is at the heart of everything that the Greater Manchester Strategy is trying to achieve*” and the Greater Manchester Strategy itself states that it has put “*the climate and equalities agendas at its heart.*”

The EQIA goes on to say (page 5) that “*It should be noted that the EqIA seeks to not only avoid / mitigate negative impacts on equality, but is also focused on enhancing, in this case the PfE Plan objectives and policies, in relation to equality matters. As such, the IA goes beyond the minimum requirements of assessing impacts in line with the Equality Act 2010, but also provides a holistic assessment of equality, diversity and health and wellbeing (an important factor in determining equality) and embeds this within the IA framework and throughout the assessment of the iterations of the draft PfE Plan*”.

MDC6 page 9 states “*To ensure this IA meets the requirements of EqIA, it will consider whether there is potential for PfE policies to affect people differently based on the protected characteristics and this is reflected in the IA Framework*”. But it does not meet that purpose. Land for travelling people, for example, is subordinated to Local Plans, meaning that Local Authorities will consider their requirements AFTER the allocation of land for market housing and warehousing, NOT alongside those considerations. The plan prioritises the allocation of Green Belt and other land for market housing and warehousing. The IAs for the allocations make no reference in IA Objective 5 “*Ensure no discrimination based on ‘protected characteristics’*” to the lack of consideration of land for travelling communities in the plan. The IA dismisses this with the comment “*Policy does not mention this, it is assumed that it is too high level to affect unprotected characteristics*”. Clearly, given the purpose of the strategic plan, the lack of consideration for those with protected characteristics should have been highlighted, not just scored as neutral!

Inequality pervades the plan. Unlike warehousing and logistics, the rural economy will be addressed AFTER significant Green Belt release. This means that some best and most versatile agricultural land is no longer available to those wishing to continue to operate or expand their rural businesses, affecting not just those companies themselves, but also their supply chains. Given the Green Belt covers almost 50% of GM’s land mass, it is inequitable to exclude that land from a strategic plan covering 9 Authorities over the next 17 years, not addressing any aspect of the development or growth of the rural economy, nor allocating any land to support nature’s recovery. It is incomprehensible that the IA did not address this issue.

We believe the PfE Plan does not address the requirements of the Equalities Act 2010, as set out on page 7 of MDC8 and this has not been highlighted by either the EQIA (for those with protected characteristics) or the full IA (for the wider EQIA assessment as mentioned on page 9 of MDC8).

The EQIA goes on to say (page 12) that, in relation to the thematic policies, the “*PfE Main Modifications 2023 have received positive scores against the IA objectives*”. Clearly more work is needed for them to be adequately assessed in relation to the equalities agenda.



### Introduction

#### MM1.2 (paragraph 1.26)

The modification MM1.2 to change the plan period from 16 years to 17 years is not positively prepared, is unjustified and is ineffective, making it unsound. No evidence has been added to the Examination Database to justify the change from the 16-year submitted plan to a 17-year plan.

The modification to increase the plan period by an additional year increases the Government's Housing Need calculation for the plan area by 100,000 homes (see paragraph 1.36). Given that NPPF paragraph 31 requires that the plan policies "*should be underpinned by relevant and up-to-date evidence*", it would be more reasonable for the period to revert to a 16-year plan, covering the years 2023-2039 (for this period to be effective the 2023 SHLAAs and SELAAs would need to be used within the evidence base).

In addition, in relation to the modification which suggests the plan "*sets out policies to inform the preparation and determination of planning applications*", planning applications that come forward in advance of the plan being adopted are not required to adhere to the policies within this plan. This means that, with the current proposal, the policies are ineffective for a minimum of two years of the plan period, leading to ambiguity and confusion, examples of this are provided in our response to the modifications in JPA33 (New Carrington) and in our attached document (New Carrington Justification).

#### MM1.5 (paragraph 1.34)

This modification MM1.5 is unsound because at least some of the "large sites" mentioned require the release of Green Belt. There is no justification for releasing Green Belt when the plan is adopted in 2024 to accommodate sites that will not be delivered prior to the end of the 17-year plan period.

In addition, as highlighted in our response to the JPA33 modifications and in our attached document New Carrington Justification, some of these large Green Belt sites cannot support the "*scale or quality of development required*" and should be subject to a review.

This modification is, therefore, unjustified and unsound. To make it sound Green Belt sites that cannot be delivered within the plan period or cannot accommodate the required development should be removed from the plan for further assessment within the Local Plan process.

#### MM1.6 (paragraph 1.36)

This modification MM1.6 is unsound because it refers to an unjustified plan period and should be amended to reflect a 16-year plan period. In addition, in April 2021, the government published their [response to the Changes to the Current Planning System](#), which stated that "*Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt*".

Given that NPPF paragraph 31 requires that the plan policies "*should be underpinned by relevant and up-to-date evidence*", there should have been a modification to the second sentence of paragraph 1.36 to reference the latest household projections provided by the Census 2021 data, clarifying the level of growth already built into the figures calculated using the government's standard methodology and confirming why there is a requirement to release Green Belt.

This modification is, therefore, both ineffective and unjustified, making it unsound.



### **MM1.8 (paragraph 1.49, 1.50 & 1.51)**

The deletion of paragraph 1.49 is not required for soundness and should be reinstated.

Please see our response to MM8.17 in relation to the revised figures set out at paragraph 1.50. It would be helpful if this paragraph referenced paragraph 8.54.

In addition, the modification MM1.8 (paragraph 1.50) that increases the amount of Green Belt to be released (due to many of the Additions no longer being included in the plan) is a major change to the plan and should have been fully consulted upon. The change to the Green Belt Additions was presented in a Hearing session and many residents have not had the opportunity to comment or to propose alternative additional Green Belt sites to replace those that do not meet the criteria.

The modification is, therefore, not positively prepared or justified, and is unsound.

In considering the soundness of the proposals to release Green Belt in this plan, the planning inspectors should take the latest statement from the government into account. The [government response to reforms to national planning policy report](#) (November 2023) confirms that “*The government has no plans for a national review of the Green Belt. This government is committed to protecting and enhancing the Green Belt. National planning policy includes strong protections for Green Belt land, and this policy will remain firmly in place. National planning policy is also clear that local authorities should make as much use as possible of brownfield land, reducing the pressure to consider greenfield sites, and the government is providing significant financial support for the take-up and completion of brownfield redevelopment. In our recent consultation on our proposed approach to updating the National Planning Policy Framework, we proposed to strengthen Green Belt policy by making clear that local authorities are not required to review Green Belt boundaries to meet housing needs. We are analysing responses to the consultation and expect to publish a response later this year.*”

### **MM1.9 (paragraph 1.52)**

The modification MM1.9 in paragraph 1.52 is a significant weakening of the ambition set out in the submission version and this significant change of approach should be subject to full consultation. This makes the modification unjustified and, therefore, unsound.

Furthermore, this major change, which will impact the achievement of the 2038 Carbon Neutral Target, has not been addressed in the Integrated Assessment.

The deletion of the final sentence in this paragraph is not needed for soundness purposes and should be reinstated.

### **MM1.10 (paragraph 1.57)**

This modification MM1.10 should also reference the requirement for Local Plans to achieve the minimum affordable housing ‘targets’ set out in JP-H2. Without this change, the modification is ineffective and unsound.

### **MM1.11 (paragraph 1.58)**

The modification MM1.11 does not comply with national policy.

Paragraph 9.4 of the plan states that inclusion is promoted within the plan in a wide variety of ways, including “*Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future.*”





Yet, as a strategic plan, the proposed subordination of the affordable housing 'target' to reasoned justification (deleting altogether the reference to social housing), the lack of consideration of sites for (for example) travelling people and students and the lack of focus on the rural economy, means that this plan is discriminatory because the land (including that being released from Green Belt) is being prioritised for market housing and warehousing purposes. Other land uses, which will impact the most vulnerable in our society, including those with protected characteristics, are being relegated for future consideration in local plans. In subordinating these other land uses to reasoned justification and the local plans appears to demonstrate that they are considered secondary to market housing and warehousing.

It should be noted that the plan repeatedly highlights that it is focused on delivering the ambitions of the Greater Manchester Strategy, which states that the most pressing issues for the city-region are **"responding to the interconnected challenges of climate change and inequality"**. In not addressing the issues of inequality within the strategic policies within this plan, the modification, and the plan, is, therefore, unsound.

In addition, no land is set aside in this plan for development to support nature's recovery, despite GM being a pilot for Local Nature Recovery Strategies. This means that, even if the Green Belt sites being proposed for release in this plan, is the land in a district with the highest environmental and/or amenity value (NPPF paragraph 175), it will no longer be available to the district for designation to support nature's recovery because it will have been prematurely allocated for construction.

Furthermore, the policy does not make it clear which plan has precedence in the event of an unexpected conflict with a current Local Plan policy (ie a policy not listed in Appendix A).

## Context

No comments

## Vision

### MM3.1 (Key Diagram Figure 3.1)

Despite the modification MM3.1, Figure 3.1 demonstrates the importance of Stockport to maintaining southern competitiveness (confirmed in paragraph 4.21), yet this has not been assessed in the Integrated Assessment at any point making the plan unjustified, ineffective and unsound. Given Stockport's important role in sustaining southern competitiveness, the impact of that district deciding to adopt a different growth strategy and/or alternative targets to those set out in PfE should have been reviewed in the updated IA.

## Strategy

### MM4.1 (paragraph 4.10)

The modification MM4.1 is not consistent with Plan Objectives 2 and 3, which require the plan to **"Prioritise the use of brownfield land"** and represents a significant weakening of the policy. The modification is unsound as it makes the plan ineffective in its ability to support the achievement of the Plan Objectives.



### **MM4.2 (paragraph 4.11)**

The modification MM4.2 is ineffective and unsound as it is inconsistent with Plan Objectives and should be reworded to confirm that development will “*Prioritise sustainable modes of transport*”, “*Prioritise development in well-connected locations*” and “*Focus new development within 800m of sustainable transport hubs*”.

### **MM4.3 (paragraph 4.20)**

The modification MM4.3 is ineffective and unsound because Appendix D only covers the “*Necessary Transport Interventions*” for the (Green Belt) allocations, which means only 10% of the proposed housing development and 49% of the proposed warehousing development requirements. There is no indication of the “*Necessary Transport Interventions*” required to facilitate the existing land supply (brownfield developments) and the Transport Strategy 2040 (and its associated Transport Delivery Plan) are not aligned with Appendix D.

### **MM4.7 (JP-Strat1 Core Growth Area)**

The deletion of sentences in this modification MM4.7 are not required for soundness and should be reinstated.

In addition, the removal of the numerical requirement from this policy (to Reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

### **MM4.9 (JP-Strat2 City Centre)**

The deletion of sentences in this modification MM4.9 are not required for soundness and should be reinstated.

In addition, the removal of the numerical requirement from this policy (to reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

### **MM4.10 (Figure 4.3 City Centre)**

This modification MM4.10 includes reference to HS2 which should be removed.

### **MM4.12 (JP-Strat3 The Quays)**

The deletion of sentences in this modification MM4.12 are not required for soundness and should be reinstated.



## Friends of Carrington Moss

In addition, the removal of the numerical requirement from this policy (to reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

### **MM4.13 (JP-Strat4 Port Salford)**

The modification MM4.13 does not reflect that the “*Necessary Transport Infrastructure*” is set out in Appendix D. Given its expected strategic importance, consideration should also be given to whether this allocation should be deemed a National Strategic Infrastructure Project and managed through that process, rather than via this plan.

### **MM4.16 (JP-Strat5 Inner Areas)**

The deletion of sentences in this modification MM4.16 are not required for soundness and should be reinstated. In particular, the deletion of the phrase “*prioritising the re-use of previously developed land*” is totally consistent with Plan Objectives 2 and 3 and should be retained.

In addition, the removal of the numerical requirement from this policy (to reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

### **MM4.18 (JP-Strat6 Northern Areas)**

The modification MM4.18 is not consistent with Plan Objectives 2 and 3, which require the plan to “*Prioritise the use of brownfield land*” and represents a significant weakening of the policy. The modification is unsound as it makes the plan ineffective in its ability to support the achievement of the Plan Objectives.

The deletion of the final two paragraphs are not required for soundness and they should be reinstated.

### **MM4.20 (JP-Strat7 North-East Growth Corridor)**

The modification MM4.20 removing the numerical requirement from this policy (to reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans.

Furthermore, the modification which removes reference to the High Crompton Broad Location is one of many major changes to the submitted strategy, which should have resulted in a further full consultation with residents.

The deletion of the final sentence in this modification MM4.20 are not required for soundness and should be reinstated, and should include a reference to Appendix D.



### MM4.23 (JP-Strat8 Wigan-Bolton Growth Corridor)

The modification MM4.23 to remove the numerical requirement from this policy (to reasoned justification) makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. This modification reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

The modifications to the second paragraph significantly weaken the policy, making it ineffective and unsound. They should be reversed as they no longer support the achievement of the Plan Objectives to “*Prioritise sustainable modes of transport*”, “*Prioritise development in well-connected locations*” and “*Focus new development within 800m of sustainable transport hubs*”. In addition, this paragraph should make reference to the need to implement the “*Necessary Transport Infrastructure*” set out in Appendix D.

### MM4.25 (JP-Strat9 Southern Areas)

The deletion of sentences in this modification MM4.25 are not required for soundness and should be reinstated. In particular, the deletion of the phrase “*prioritising the re-use of previously developed land*” is totally consistent with Plan Objectives 2 and 3 and should be retained.

In addition, there is no numerical requirement set out in this policy, which makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. The lack of such data in the policy reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.

This policy (and the reasoned justification) is predicated on the delivery of HS2 and the HS2 station. Given the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, this strategic policy should be fully reviewed and re-issued for consultation.

### MM4.26 (Manchester Airport Reasoned Justification)

Given the emphasis in the plan on achieving the carbon neutral targets by 2038, the deletion of the latter part of paragraph 4.67 in this modification MM4.26 means there is now no reference to the important issue of the airport committing to achieving net zero carbon emissions, making the modification ineffective and unsound. This should be rectified by an amendment to the modification to address this issue and make it sound.

This reasoned justification is predicated on the delivery of HS2 and the HS2 station. Given the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, this strategic policy should be fully reviewed and re-issued for consultation.

### MM4.27 (JP-Strat10 Manchester Airport)

This policy is predicated on the delivery of HS2 and the HS2 station. Given the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, this strategic policy should be fully reviewed and re-issued for consultation. In particular, the expectation (criterion 3) that there will be around 60,000 m2 office space around the new HS2 Station should be removed from this policy and the allocation (especially as there is sufficient existing office floorspace in existing land supply to more than meet GM’s needs). The policy is, therefore, unjustified and unsound.





### MM4.28 (Figure 4.7 Manchester Airport)

This modification MM4.28 includes reference to HS2 which should be removed.

### MM4.29 (Reasoned Justification JP-Strat11 New Carrington)

The modification MM4.29 and the policy does not make it clear that the numbers include land which already has planning permission and that these figures reflect the total expected development for the allocation area (not the expected development that will come forward once the Places for Everyone Plan has been adopted). In addition, the policy does not make it clear that, where the development already has approval, it is not required to follow the policies within this plan. The modification is ambiguous and ineffective (and, therefore, unsound) and could lead to more Green Belt release in the Local Plan, which is contrary to Plan Objectives 2 and 3.

The modification which deletes “~~including through good quality design, enhanced green infrastructure (and access to it)~~” is not required for soundness and should be reinstated.

The paragraph commencing with the words “*Major investment*” should have been modified to include reference to Appendix D.

### MM4.30 (Figure 4.8)

The modification is unsound because the graphic is ineffective and not fit for purpose and is, therefore, unsound. This graphic (figure 4.8) has caused significant confusion for local residents as it appears to show the Carrington Relief Road extending down to Partington – unlike Picture 11.48. It is not representative of the allocation area and does not show the other proposed link roads.

There is no legend on the graphic, so it is not possible to understand whether the dotted lines are roads, active travel routes or other forms of transport.

### MM4.31 (Main Town Centres Reasoned Justification)

The modification AM4.7(paragraph 4.77) deletes text which IS consistent with Plan Objectives 2 and 3 (requiring the plan to “*Prioritise the use of brownfield land*”) and represents a significant weakening of the wording. This should be considered a Main Modification rather than a Minor Modification. The modification is unsound as it makes the plan ineffective in its ability to support the achievement of the Plan Objectives.

### MM4.32 (JP-Strat12 Main Town Centres)

The modification MM4.32 contains no numerical requirement for this policy, which makes it ineffective, inconsistent with the Plan Objectives and, therefore, unsound. The lack of such data in the policy reduces the probability of the expected level of development being delivered to meet this strategic aim and increases the likelihood of additional Green Belt release being required in Local Plans because the expected level of development using existing land supply (brownfield) is not achieved.



### Sustainable and Resilient Places

#### MM5.1 (JP-S1 Sustainable Development)

The modification MM5.1 in the second paragraph should be consistent with the Plan Objectives 2 and 3, that require the plan to “*Prioritise the use of brownfield land*”. The modification is unsound as it makes the plan ineffective in its ability to support the achievement of the Plan Objectives.

#### MM5.2 (Addressing Climate Change)

The modification MM5.2 unnecessarily removes the whole of the third bullet in paragraph 5.7. To be sound, the modification should be reversed and should set out where these measures are now shown as the plan repeatedly highlights that it is focused on delivering the ambitions of the Greater Manchester Strategy, which states that the most pressing issues for the city-region are “**responding to the interconnected challenges of climate change and inequality**”.

#### MM5.3 (JP-S2 Carbon and Energy)

As mentioned in modification MM5.2, the Greater Manchester strategy states that the most pressing issues for the city-region are “**responding to the interconnected challenges of climate change and inequality**”, that GM needs “**to act quickly on decarbonisation**” and that the “**refreshed Greater Manchester Strategy therefore puts the climate and equalities agendas at its heart**”. GM has a Plan Objective (7) to “Promote carbon neutrality of new development by 2028” and an aim to be carbon neutral no later than 2038. Legislation (Planning and Compulsory Purchase Act 2004) states that “*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.*” Furthermore, the Government has confirmed (in its [response to the CCC Annual Progress Report 2023](#)) that the aim remains “*to ensure we reach net zero emissions by 2050*”, and that there is an intention “*to review national planning policy to make sure it further contributes to climate change mitigation and adaptation*”. The response goes on to state that the “*NPPF is already clear that the planning system should support the transition to a low carbon future in a changing climate. At the heart of the framework is the presumption in favour of sustainable development, for plan making, this means that all plans should promote sustainable patterns of development that seeks to improve the environment and mitigate climate change*”.

With these requirements in mind, the modifications to criterion 8 significantly weaken the policy and make it, and the plan, ineffective and unsound. If it is not practicable or financially viable to achieve the requirements of this criterion, the development should not be approved as this would undermine achievement of the 2038 Net Zero Carbon target.

In addition, OD36 confirmed that “*Modelling currently used by Greater Manchester Combined Authority (GMCA) suggests that 50-75% of peatland in the city region will need to be restored in order to achieve these targets, but this modelling may significantly underestimate the role of peat in net emissions budgets*”. To be effective and sound, the modification to criterion 8 should have included reference about how new development on areas of deep peat, or land that otherwise supports the mitigation of climate change, must alleviate the impact on GM's ability to meet the carbon neutral target.

Greater Manchester has produced two recent reports which confirm that the Region is currently behind where it needs to be in order to achieve its ambition for GM to be carbon neutral by 2038:

- (<https://aboutgreatermanchester.com/media/kedllujt/gms-progress-report-july-2022.pdf>
- <https://democracy.greatermanchester-ca.gov.uk/documents/g4966/Public%20reports%20pack%2022nd-Mar-2023%2013.00%20GMCA%20Overview%20Scrutiny%20Committee.pdf?T=10>).



This means that PfE, which now covers the period 2022-2039, MUST include policies that drive the achievement of that target, rather than planning to fail it. A detailed assessment of the Carbon Implications of Places for Everyone (which has been undertaken by community groups because the GMCA failed to provide any quantitative analysis of the implications) is available at this link <https://steadystatemanchester.files.wordpress.com/2023/11/p4e-carbon-impact-report-draft-v5.0.pdf>. The document concludes that GM is likely to over-run its carbon budget and that Places for Everyone (P4E) will exacerbate the problem, while also imperilling the less ambitious national net zero budget.

The inclusion of allocations in isolated locations, on deep peat and/or land which supports the mitigation of climate change cannot be considered to be sustainable nor supportive of this important aspiration. We do not believe the proposed changes (or the issues raised by OD36) have been adequately tested in the Integrated Assessment and set out our concerns in our response related to those documents.

The modification in the final paragraph of this policy suggest that districts can set out specific carbon emissions reduction and energy demand targets within Local Plans. This is contradictory, ineffective and unsound given that this plan sets a target for the number of homes to be built (there should be associated targets related to carbon emissions and energy demand within this plan). The proposed approach will lead to inconsistencies between districts, making the modification ineffective and unsound.

In addition, we do not believe it is necessary to remove criterion 4 for soundness reasons. It should be reinstated.

### **MM5.5 (JP-S3 Heat and Energy Networks)**

The modifications MM5.5 have significantly weakened the policy, making it ineffective and unsound. If criterion 2 cannot be delivered because it is not practicable or financially viable, development should not be approved.

The deletions to criteria 2b, 2c and 3 are not necessary for soundness purposes and should be reinstated in policy.

### **MM5.8 (JP-S4 Resilience)**

The deletion of this policy has weakened the plan as the emphasis on these important issues has been diluted. As originally stated in paragraph 5.25, ensuring resilience is a key element of achieving sustainable development.

We do not believe the impact of deleting this policy has been adequately covered in the updated Integrated Assessment.

### **MM5.10 (JP-S5 Flood Risk and the Water Environment)**

In relation to the MM5.10 modification to criterion 4, if development is unable to achieve greenfield run-off rates, it should not be approved. Many of the allocation sites, for example, currently capture and store huge amounts of surface water. Dismissing the importance of this by suggesting that greenfield run-off rates are not necessary if it can be demonstrated to be impracticable is ineffective and, therefore, unsound.

The deletion of criterion 7 is not required for soundness purposes and it should be reinstated.



### MM5.12 (JP-S6 Clean Air)

We note that the UK Government has, through the Environment Act, set two further air pollution targets. These relate to **fine particulate matter** (PM<sub>2.5</sub>) and the policy and the plan, particularly the allocation of sites in isolated locations that rely heavily on road-based transport options, should be reviewed to ensure it will support participating Councils to achieve these targets.

The modification MM5.12 to criterion 2 weakens the policy as “*having regard to*” is a much lower standard of requirement than “*in accordance with*”. This makes the policy ineffective and, therefore, unsound and the original wording should be reinstated.

The modification at criterion 3 is weak, making the policy ineffective and, therefore, unsound. The modification should be changed to state that development will only be permitted if it does not cause non-compliance with national policy (including affecting achievement of the new targets within the Environment Act). The criterion should also confirm the importance of sustainable transport to the achievement of air quality improvements, in accordance with Plan Objective 7. The deletion in this criterion is not necessary for soundness and should be reinstated.

The Clean Air Plan referenced at criterion 6 has not been published, so it is impossible to determine whether this is an effective policy criterion. We are also concerned that removing reference to the Clean Air Zone without a plan in place to mitigate the implications of the excessive growth strategy could result in non-compliance with air pollution targets.

We can see from GM's own data that NO<sub>2</sub> pollution is rising again and the plan (particularly the unnecessary proposals for large, unsustainable allocations in isolated locations, without sufficient sustainable freight and passenger transport options) will accelerate this.

<https://www.gmtableau.nhs.uk/t/GMCA/views/GMSSharedCommitment-CarbonNeutralGM-January2023/NOExceedances?%3Aembed=y&%3AisGuestRedirectFromVizportal=y>

We believe the policy is not properly prepared, is unjustified, ineffective and, therefore, unsound.

### MM5.13 (JP-S7 Resource Efficiency)

The modification that deletes criterion 2 in this policy is not needed for soundness purposes and should be reinstated.

## Places for Jobs

### MM6.1 (JP-J1 Supporting Long Term Economic Growth)

The modification MM6.1 at criterion G that deletes the phrase “*whilst also securing investment that raises the competitiveness of our northern boroughs*” is not consistent with the aims of the plan and is not required for soundness, so should be reinstated.

### MM6.4 (JP-J2 Employment Sites and Premises)

The modification MM6.4 that deletes the final sentence of the second paragraph is not needed for soundness purposes and should be reinstated. In fact, the modification should be strengthened by introducing reference to Plan Objective 3 “*Prioritise the use of brownfield land*” at the beginning of this sentence.

If there is a view that the final part of the sentence could suggest that further Green Belt release may be required in local plans, this part of the sentence can remain deleted.





### MM6.6 (JP-J3 Office Development)

We referenced our concerns about the additional year added to the plan period in our response to MM1.2. We believe this change is not sound as it results in an increase in the requirement for office land that is not justified or sound.

In addition, the amount (m2) of proposed accessible new office space is predicated on the delivery of HS2 and the HS2 station. Given the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, this policy should be fully reviewed and re-issued for consultation.

### MM6.9 (Reasoned Justification Office Development Land Supply)

We referenced our concerns about the additional year added to the plan period in our response to MM1.2. We believe this change is not sound as it results in an increase in the requirement for office land that is not justified or sound.

In addition, given the huge amount (m2) of available office space across the plan area, and the cancellation of HS2, the release of Green Belt to provide an additional 64,500m2 office space is not justified or sound.

### MM6.10 (JP-J4 Industry and Warehousing Development)

We referenced our concerns about the additional year added to the plan period in our response to MM1.2. We believe this change results in an increase in the requirement for industrial and warehousing space that is not justified or sound.

In addition, the modified figure (3,513,000 m<sup>2</sup>) is neither justified nor sound. In this version of the plan, the Gross Need figure is 2,692,800, to which a **30%** flexibility margin has been applied to create the Policy JP-J4 'target' of 3,513,000. The Baseline Supply was 2,073,986, to which the Allocations were then added bringing the total supply (including post 2039 allocations) to 4,443,971 – meaning that a buffer of **65%** has been added to the Gross Need figure to facilitate the release of Green Belt sites, some of which will not come forward within the plan period!

GM's own evidence base suggests that this figure significantly overstates employment land needs. Nicol Economics advised in their Note on Employment Land needs in Greater Manchester (paragraph 5.9; document 15 in the GMSF 2020 evidence base) that *"A combined need and supply margin of 50% falls well outside the bounds of what has been generally used elsewhere (up to around 25% or at most 5 years of supply)"*.

In addition, Plan Objective 3 (Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester) states that plan participants will:

- "Ensure there is **adequate** development land to meet our employment needs;
- Prioritise the use of brownfield land;
- Ensure there is a **diverse range** of employment sites and premises;
- Facilitate the development of high value clusters in key economic sectors such as:
  - Advanced manufacturing;
  - Business, financial and professional services;
  - Creative and digital;
  - Health innovation;
  - Logistics".

The word "*adequate*" does not suggest the need or justification for a **65%** buffer to be added to the available land supply (resulting in almost 50% of the proposed warehousing being developed on Green Belt). The Plan Objective to prioritise the use of brownfield land should be observed in this plan by removing the Green Belt allocations for consideration within Local Plans **AFTER** available brownfield land has been developed.



When the plan is considered as a whole, there are a range of employment sites and premises within the available land supply (SELAAAs for each participating district). Given the amount of brownfield land available, including the huge surplus of office land supply, in much more sustainable locations, there is no justification for Green Belt release for warehousing and logistics development.

Furthermore, Policy JP-J2 states that the removal of land from the Green Belt will “*provide the quality of well-connected employment land supply necessary to deliver the required scale of long-term economic growth*”. In fact, the land being released from Green Belt is overwhelmingly in isolated locations, without any plans for sustainable freight transport, and will be used only for warehousing and logistics, not providing the diversity of job opportunities needed by existing and new communities.

In addition, the delivery of Greater Manchester’s growth strategy is predicated on the benefits brought by HS2. Given the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, this policy should be fully reviewed and re-issued for consultation.

The deleted paragraphs should be reinstated as the deletions are not needed for soundness purposes. In fact, those reinstated paragraphs need to be strengthened to clarify that the land being released from Green Belt **IS** able to provide the large-scale logistics sites required. This clarification is necessary because, in evidence put forward in a recent planning application, a developer sought to justify a proposal to fell a whole woodland site of biological importance, within the JPA33 allocation area, and replace it with a 22m high warehouse. The developer comments, in relation to the Places for Everyone Plan, (Emery letter 109755/OUT/22), that PfE “*proposes to allocate a quantum of employment land significantly higher than past take-up rates based on the need to address qualitative issues in the market, in particular the need for large-scale logistics*”.

Having made the claim that B2/B8 warehousing space is essential to sustaining southern competitiveness, paragraph 6.21 of the 109755 Planning Statement highlights (in relation to the Green Belt land to be released within the JPA33 allocation for employment purposes) that “*CE3A (land south of Lyondellbasell) largely falls within the Lyondellbasell inner COMAH zone and a large-scale unit (i.e., in excess of 250,000 sq. ft / 23,225 sqm) would not be possible*”.

This suggests that it is unsound for the Green Belt land at CE3A to be released as it will not support the size of development required. This is also true of any other Green Belt land in the region which cannot deliver large-scale logistics. Given the clear lack of exceptional circumstances to release Green Belt, all such sites should be considered unsound and removed from the plan as, when considering PfE as a whole, GM has more than sufficient existing employment land supply to deliver general warehousing units (and ensure SBIs are not prioritised for development).

Furthermore, no Green Belt should be released to satisfy requirements that will not come forward within the plan period.

For the reasons set out above, the policy is not positively prepared, is not justified, nor is it effective. It is, therefore, unsound.

## Places for Homes

### MM7.2 (Reasoned Justification Housing Land Supply)

The modification MM7.2 (paragraph 7.12) is not effective and is unsound as it is not consistent with Plan Objective 2 “*Prioritise the use of brownfield land*”. Prioritising brownfield land would mean that the plan ensured that “*the predominant source of land over the plan period*” would come forward in advance of any Green Belt/greenfield sites.

The modification MM7.2 of the table at paragraph 7.13 is unjustified and ineffective and is unsound (for the reasons set out below). We believe that, in enabling the unnecessarily and premature release of Green Belt land, the planning inspectors have not given sufficient consideration to all the relevant evidence that has been presented in representations and during the Hearings.



In weighing the soundness of this table, the planning inspectors should take the following into account:

- The housing figures have been significantly over-inflated. To be sound, the NPPF only requires sufficient land supply to be identified for the first 15 years of the plan, not for the whole plan period. In addition, national policy only requires a buffer to be added to the 5-year figure, not the whole of the land supply.
- PfE takes no account of the large/medium windfall, which the GMCA acknowledges will continue to come forward, this is estimated at over 10,000 units per annum for the plan area (see our attached document New Carrington justification for the implications of this).
- PfE paragraph 7.14 confirms the organic population increase for Greater Manchester between 2022 and 2039 is expected to be 165,600 which, given an average household size of 2.4 (Census 2021), means the estimated number of additional homes needed to meet the organic household increase is 69,000.
- The government's housing need figure\* requires Greater Manchester to build 175,185 dwellings, providing, what is described in paragraph 7.16 as, "a significant buffer flexibility allowance". At over 100,000 dwellings, the buffer is much greater than the number of additional homes needed to meet the organic household increase and represents housing growth (above organic need) of more than 253%, sufficient additional dwellings to build the equivalent of two new Boroughs in Greater Manchester.
- Planning Practice Guidance (Paragraph: 001 Reference ID: 3-001-20190722) states that "An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period"
- The Strategic Housing Land Availability Assessments (2022) confirm that there is sufficient "suitable, available and achievable" land to develop 178,766 dwellings (without releasing Green Belt), exceeding that already significantly over-stated government housing need figure\*.
- Paragraph 8.60 of the plan states that "*The need to deliver the positive long-term outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt.*" Yet, paragraph 8.3 of the Greater Manchester Strategy states that GM needs "*to build over 10,000 houses a year for the next 20 years*", a figure which can be met by delivering the "suitable, available and achievable" existing land supply (without any requirement to release Green Belt land), meaning that the exceptional circumstances to justify altering the boundaries of the Green Belt have **NOT** been demonstrated.
- Greater Manchester has been awarded significant sums of public money as part of the deeper devolution deal and other government funding to deliver the regeneration of brownfield land.
- GM's choice of Growth and Spatial Options was agreed prior to the declarations of a climate emergency and the Net Zero target, it was also aligned with the delivery of HS2 and the associated infrastructure. Given the ambitions of the Greater Manchester Strategy (putting the "*climate and equalities agendas at its heart*"), the cancellation of HS2 and the time that could elapse prior to a replacement being agreed and funded, both the Growth and Spatial Options and this policy should be fully reviewed and re-issued for consultation.
- Greater Manchester's residents have repeatedly been told that the plan "*focuses on making the most of Greater Manchester's brownfield sites, prioritising redevelopment of town centres and other sustainable locations*".
- PfE paragraph 1.41 states that "*Districts have looked to **maximise the contribution of brownfield land by applying higher densities** in the most accessible locations*" and paragraph 7.30 states that "*A key part of the overall strategy is to **maximise the amount of development on brownfield sites in the most accessible locations** and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends*". Yet, the SHLAAs contain no evidence about the expected densities to be achieved, meaning that the level of Green Belt release proposed could be significantly reduced or removed entirely.



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- NPPF Paragraph 31 states that the “*preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*” and the [Guide for Local Plan Examinations](#) suggests (paragraph 1.12) that evidence base documents “*should be updated as necessary to incorporate the most recent available information*”. The Census data should, therefore, have been taken into consideration when assessing housing need, prior to deciding to include Green Belt allocations within the proposed housing land supply.

\* The Census 2021 data confirms that the government’s standard methodology calculations significantly over-state housing need. It has been widely demonstrated (including in ONS data) that population growth expectations have fallen considerably since the government’s 2014-based dataset was produced. GM’s household growth figure for 2021 was projected to be 100,626 in 2014 - the Census actual was **50,034** (only 50% of the figure projected in 2014). This means that GM’s ability to meet/exceed the government’s housing need figure from existing land supply already provides a huge buffer (without the release of any Green Belt land).

Furthermore, the government has stated ([in their response to the local housing need proposals in “Changes to the current planning system”](#)) that “*Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt*”.

See our attached document New Carrington Justification for the implications of the proposed unnecessary release of Green Belt.

### MM7.3 (JP-H1 Scale, Distribution and Phasing of New Housing Development)

We referenced our concerns about the additional year added to the plan period in our response to MM1.2. We believe this change is not sound as it results in an increase in the requirement for market housing that is not justified or sound.

We have referenced our concerns about the lack of justification for the release of Green Belt to meet housing land supply in our respond to MM7.2.

The modification MM7.3 which deletes the reference to Table 7.1 should be replaced with a statement referring to Plan Objective 2, which states that GM will “*Prioritise the use of brownfield land*”. The current proposal to release Green Belt land on the date the plan is adopted is not consistent with Plan Objectives 2 and 3 and is, therefore, unsound.

In addition, the modification which requires planning authorities to identify and update annually a “*minimum of five years’ worth of housing*” is ineffective given the recent government consultation, and should government policy change, may no longer be compliant with national policy. As such, this modification should be changed to reflect that local planning authorities will produce such data in accordance with government guidance.

### MM7.4 (Reasoned Justification Affordability of New Housing)

This modification MM7.4 paragraph 7.23 is ineffective, unjustified and unsound as it does not make reference to the aim to provide 60% of affordable homes for social and affordable rent. This requirement should be made explicit in the plan as Greater Manchester’s residents have [repeatedly been told](#) that the plan will “*help to address the housing crisis with a minimum target of 50,000 additional affordable homes – 30,000 of which will be social housing*”.





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In addition, we disagree wholeheartedly with the relegation of this 'target' to the reasoned justification. As explained in our response to MM7.5, we believe this change contributes to making the plan discriminatory, inconsistent with national policy, and, therefore, unsound.

### MM7.5 (JP-H2 Affordability of New Housing)

This modification MM7.5 at criterion 2 of JP-H2 is ineffective, unjustified and does not comply with national policy nor with Plan Objective 5 (which aims to reduce inequalities and improve prosperity). It is, therefore, unsound.

The proposed relegation of the affordable housing 'target' to reasoned justification and Local Plans is also contrary to the stated aim of this plan, which it repeatedly highlights is focused on delivering the ambitions of the Greater Manchester Strategy, which emphasises that it puts the ***"the climate and equalities agendas at its heart"***.

Removing the 'target' from policy will result in a reduction in the number of new affordable homes provided by this plan, despite Plan Objective 1. It will also impact the number of homes available to meet *"the wide variety of needs at a price people can afford"* (paragraph 9.4).

There is no "soundness" reason requiring the demotion of the affordable housing 'target' to the reasoned justification (or for entirely removing the 'target' for genuinely affordable homes). Given there is a 'target' for market housing within policy, it is inconsistent to remove the affordable housing 'target' from policy.

Furthermore paragraph 7.24 of the plan states that *"increasing the delivery of affordable housing across the Plan area is a very high priority, and it will be essential that new residential developments play a full role in supporting this"*. This modification is, therefore, not justified and is unsound.

Paragraph 9.4 of the plan states that inclusion is promoted within the plan in a wide variety of ways, including *"Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future"*. Yet, as a strategic plan, the aspiration to provide *"Places for Everyone"* is welcome but cannot be achieved with policies that only emphasise the delivery of market housing and warehousing. The prejudicial interest in those requirements, whilst subordinating affordable housing to the Local Plan, along with sites for (for example) travelling people and students and consideration of the rural economy, means that this plan is discriminatory. It does not tackle the inequalities highlighted in the Greater Manchester Strategy.

In prioritising the available land (including that being released from Green Belt) for market housing and warehousing purposes, other uses, which will impact the most vulnerable in our society, including those with protected characteristics, have been consigned to the, still to be developed, Local Plans, a lack of consistent objectives and policies and the whim of future decision-making. In addition, the stark focus on market housing and warehousing in this plan is emphasised further by the fact that no land is set aside for development to support nature's recovery, despite GM being a pilot for Local Nature Recovery Strategies.

In not addressing the issues of inequality within this plan, the modification, and the plan, is, therefore, unsound.

Furthermore, neither the Equalities Impact Assessment (MDC8, Appendix A EQIA), which (page 5) *"is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010"*, nor the full IA, have addressed these issues.

### MM7.6 (Reasoned Justification Type, Size and Design of New Housing)

Given the importance of density to available land supply, when considering the plan as a whole, the deletion of Table 7.3 is not justified and is, therefore, unsound.



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### MM7.7 (JP-H3 Type, Size and Design of New Housing)

This modification is ineffective and, therefore, unsound as it subordinates all aspects of the “*Type, Size and Design of New Housing*” to Local Plans, without any scrutiny to determine whether the Plan Objectives will be met.

### MM7.9 (JP-H4 Density of New Housing)

The policy has been weakened by the modification MM7.9 in the first paragraph. The change from “*in accordance with*” to “*Regard should be had to*” is not required for soundness purposes and should be reversed. The importance of achieving increased average densities is set out in paragraph 7.34.

The modification in what is now the final paragraph has also been weakened, making it ineffective and unsound. It should be strengthened by using the words “*in accordance with*”, rather than “*having regard to*”.

## Greener Places

### MM8.3 (Reasoned Justification Our Green Infrastructure Network)

Some of the new paragraphs introduced by modification MM8.3 to the reasoned justification should remain in, or be moved to, policy as there are no soundness reasons to move them to the reasoned justification. The paragraphs are ineffective as reasoned justification, making them unsound.

The paragraph commencing with the words “*The following opportunity areas*” should be retained in policy as these areas are “*capable of strategic-scale improvements*” to ecosystem services, essential to GM’s Green Infrastructure Network and to meeting the Enhanced Biodiversity Duty that public bodies must now comply with. It is imperative that development takes the importance of these areas into consideration and that Local Planning Authorities give them a high level of weighting.

The paragraph commencing with the words “*Where these Green Infrastructure Opportunity Areas overlap*” should be in policy as this paragraph incorporates essential policy guidance. It is, however, ineffective as policy JP-G2 does not include appropriate measures to achieve the delivery of major green infrastructure improvements. Where the allocations result in the loss of a peat moss, for example, the principles of suitable compensatory measures have not been defined in this plan. Such an important issue should not be left for negotiation when planning applications come forward.

The paragraphs commencing with the words “*The GMCA will develop standards in relation to*”, “*The GMCA will also develop standards in relation to*” and “*Development has a major role in helping to achieve*” should all be in policy. These, or equivalent, paragraphs were previously included within policy JP-G8, which has been deleted.

The final new paragraph within this modification MM8.3, commencing with the words “*Development proposals that involve*”, should be moved to policy as it incorporates essential policy guidance. Again, this paragraph is ineffective in considering the principles of suitable compensatory measures for the loss or destruction of an irreplaceable habitat.



### **MM8.4 (JP-G2 Green Infrastructure Network)**

The modification MM8.4 which results in the removal of the paragraph which commences “*The following opportunity areas*” to reasoned justification is not justified, nor effective as these are important for consideration in development policy, making the modification unsound.

As per our comments in relation to modification MM8.3, the other paragraphs referenced in that response, should be promoted to policy to make them sound.

The new paragraph that commences with the words “*Development which involves*” is ineffective as it does not provide sufficient guidance about the principles of a suitable compensatory improvement, particularly when the site to be removed from the Green Belt contains irreplaceable habitat. It is ineffective, and, therefore, unsound to leave such an important aspect to negotiation when planning applications come forward.

### **MM8.7 (JP-G4 Lowland Wetlands and Mosslands)**

The modification MM8.7 is unjustified and ineffective and, therefore, unsound, because it does not incorporate the update suggested by Natural England (in OD42) to strengthen the policy to make it clear that there should be no development on restorable deep peat.

### **MM8.10 (JP-G6 Urban Green Space)**

The removal of the words “*which meet accessibility standards*” in this modification MM8.10 is not necessary for soundness and should be reversed. If all the references to access, accessible and accessibility are to be removed from the Plan, there should be an explicit policy which specifically highlights the requirements for development in relation to buildings, travel and green spaces.

### **MM8.12 (JP-G7 Trees and Woodland)**

The modification MM8.12 at criterion 12 is not effective. To be made sound, it should make it clear that tree planting must be carried out in accordance with national guidance, including not planting trees on peatland (which was recently suggested by a developer in a mitigation proposal).

### **MM8.13 (JP-G8 Standards for Greener Places)**

Whilst we do not object to the removal of this policy, the paragraphs must be reinstated as policy as set out in our comments about modification MM8.3 for the plan to be sound.

### **MM8.15 (Reasoned Justification Biodiversity and Geodiversity)**

The modification MM8.15 in paragraph 8.52 referencing the Defra metric is ineffective and, to be made sound, should be changed to refer to the most up to date metric.

The modification MM8.15 in paragraph 8.53 using the words “*unless robust evidence in accordance with relevant government and other guidance indicates otherwise*” is ineffective as the plan has not taken this approach in allocating Green Belt for development. There is, for example, no “*robust evidence*” for JPA33, which comprises peat moss, Grade 2 agricultural land, woodland and wetland habitats (see our attached document New Carrington Justification). The policy, and the plan, is, therefore, unsound.



### MM8.16 (JP-G9 A Net Enhancement of Biodiversity and Geodiversity)

By including the words “*where relevant*”, this modification MM8.7 weakens the policy, making it ineffective and, therefore, unsound. Those words should be removed.

The removal of the words “*in accordance with legislation and national policy*” at criterion 4 is not needed for soundness and those words should be reinstated as other policies/reasoned justification within the plan refer to meeting national guidance, national policy and/or legislation.

The modification of the mitigation hierarchy at criterion 7(a) is not effective as it has not been applied to the Green Belt land allocated for development within the plan.

The removal of criterion 7(e) is not required for soundness purposes and its removal significantly weakens the policy. This criterion should be reinstated or integrated with the paragraph mentioned below.

Whilst the addition of the paragraph commencing with the words “*Development proposals should be informed by*” is welcomed, it is currently ineffective and unsound. To be made sound, the wording should be updated in line with the commentary in GMCA43 (which was produced in response to IN24). This would include reference to Preliminary Ecological Appraisals carried out in accordance with CIEEM 2017 guidelines and the policy should ensure that all such appraisals are carried out for the whole site. A separate paragraph should be inserted that covers the assessments required to accompany a planning application.

Furthermore, once the plan is adopted, the allocations set out in section 11 will be considered to have met the criteria of the policies in this plan. This is currently not the case. Any Green Belt allocation that does not have an assessment that meets the criteria set out in GMCA43 (PEA following CIEEM 2017 guidelines) should be considered unsound and removed from the plan, to be reconsidered within the Local Plan when a Preliminary Ecological Appraisal is available.

### MM8.17 (Reasoned Justification The Green Belt)

The modification MM8.17 at paragraph 8.54 is not effective and is unsound as it does not make the level of Green Belt release clear and transparent.

To be made sound, this paragraph should include a table which sets out the land for each district that is:

- currently designated as Green Belt (per government Live Tables)
- proposed for Green Belt release via the allocations in this plan
- proposed for Green Belt Addition (per the Appendix in this plan)
- proposed release of Green Belt “orphans” (pockets of Green Belt that will no longer be carrying out the Green Belt functions once land has been allocated for development).

The table should show the detail for each district and in total for the plan area.

The Green Belt Additions are land that is typically already “green” so, whilst these are adding to the overall land designated as green belt, they do not add to existing wildlife corridors or biodiversity-rich locations. Conversely, the land that will be released are clear losses to eco-system services, including the Green Belt “orphans”, which should be made explicitly visible in this plan.

It should also be clarified that the number in this paragraph (51,539.02) is the plan area’s designated Green Belt land following the adjustments to be made in this plan.

The modification MM8.17 at paragraph 8.57 is not justified or effective as it does not comply with the Plan Objectives 2 and 3 (which state that the plan will “*Prioritise the use of brownfield land*”). The modification weakens the plan, making it unsound, and should be reversed.



### MM8.19 (JP-G10 The Green Belt)

The modification MM8.19 deleting the statement that the Green Belt “*will be afforded strong protection in accordance with the National Planning Policy*” is not required for soundness purposes, this weakens the policy considerably and should be reversed. As an example, criterion 2 of JP-P2 makes reference to the policy being considered “*in accordance with national planning policy*”.

Please also see our comments in response to MM1.8.

## Places for People

### MM9.2 (JP-P1 Sustainable Places)

The modification MM9.2 amending criterion 8 is not effective and is, therefore, unsound, as it does not set out the principles of what constitutes “*appropriate provision for response and evacuation in the case of an emergency or disaster*”. Allocations in areas that could be affected by this requirement must not be able to plan to saturate the area’s roads with HGVs (especially those carrying hazardous materials), for example, rather than providing sustainable freight transport options, as this could exacerbate the problems caused by such an incident.

### MM9.3 (JP-P2 Heritage)

The modification MM9.3 unnecessarily deletes two paragraphs starting with the word “*Development proposals*”. Neither deletion is required for soundness purposes and significantly weakens the policy. Both paragraphs should be reinstated.

The addition at the end of the second of these paragraphs wording has been inserted which states that heritage assets will be considered “*having regard to national planning policy*”. To make this modification effective and sound, the wording should be changed to “*in accordance with national planning policy*”.

### MM9.5 (JP-P3 Cultural Facilities)

The modification MM9.5 unnecessarily inserts the words “*where appropriate*”. These words are not required for soundness purposes and should be removed.

### MM9.9 (Reasoned Justification Sport and Recreation)

The modification MM9.9 unnecessarily inserts the words “*where appropriate*” within paragraph 9.38. These words are not required for soundness purposes and should be removed.

### MM9.10 (JP-P7 Sport and Recreation)

The modification MM9.10 at criterion 4 is ineffective, as it is not clear what should happen when new development reduces or destroys existing sports or recreational facilities. The modification is not sound and should be revisited. In addition, the word “existing” should be deleted from this paragraph. The requirements of NPPF paragraphs 98 and 99 should be referenced and followed.





### Connected Places

#### **MM10.5 (JP-C2 Digital Connectivity)**

The modification MM10.5 deleting part of the first paragraph is not necessary for soundness purposes and should be reinstated.

The modification MM10.5 which inserts the words “*and/or unviable*” is ineffective and unsound and should be removed. If development cannot provide full fibre to premises due to a lack of viability, it should not be approved.

#### **MM10.6 (JP-C3 Public Transport)**

The modification MM10.6 which deletes the first part of the first paragraph is unnecessary for soundness purposes and should be reinstated.

The criteria in the policy and the reasoned justification paragraphs (10.46 to 10.52) relating to HS2 and NPR need to be completely reviewed and updated. Given that the spatial strategy is predicated on the delivery of HS2, its cancellation, and the time that could elapse prior to a replacement being agreed and funded, makes the growth plan and the transport policies unsound and needing to be fully reviewed and re-issued for consultation.

#### **MM10.7 (Reasoned Justification The Strategic Road Network)**

Whilst we support the modification MM10.7 introducing new wording at paragraph 10.54, it is not effective as “*sustainable economic growth*” requires investment in sustainable freight transport and this is not being proposed anywhere except in the Port Salford allocation, meaning that the plan is advocating a huge increase in HGV traffic on both the local and the strategic road network, which is contrary to national policy, making the plan unsound.

#### **MM10.8 (New Policy The Strategic Road Network)**

Whilst we support modification MM10.8 introducing a new policy, it is very limited and will be ineffective in achieving both national and regional policy requirements to achieve modal shift. At least one additional paragraph is needed to make the policy sound. The new paragraph should prioritise achievement of the PfE Plan Objectives, particularly Objectives 6 and 7.

#### **MM10.10 (JP-C5 Walking and Cycling)**

The modification MM10.10 to criterion 1 should use the words “*in accordance with*” to be effective and sound.

The modification MM10.10 which removes criterion 7 is not required for soundness purposes and should be reinstated.

#### **MM10.13 (Reasoned Justification Transport Requirements of New Development)**

The modification 10.13 introduces seven new paragraphs which should all be included in policy – not reasoned justification. The requirements set out within these paragraphs cannot be enforced from the reasoned justification, making them ineffective and unsound.



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Those paragraphs make a number of references to Appendix D. It should be clear that these policy criteria (when moved to policy) also relate to new development that is approved on previously developed land.

### MM10.14 (JP-C7 Transport Requirements of New Development)

The modification 10.14 that removes the paragraph commencing with the words “*Ensuring that new developments are planned*” significantly weakens the meaning of the paragraph, which previously stated that “*new developments should be planned and constructed with walking and cycling as the primary means of local access*”. The modification makes the criterion ineffective and unsound as it no longer requires such transport modes to be the “*primary*” means of access. The modified wording should be updated to correct this.

The modification 10.14 that changes criterion 7, weakens the policy making it ineffective. Adequate car parking provision should be provided in accordance with any parking standards set out in local plans and the criterion should be updated to reflect this.

The modification 10.14 which introduces a new paragraph after criterion 11 is ineffective as it does not state what should happen if development is likely to generate demand but there are no appropriate locations for overnight parking. If this is the case, and overnight parking cannot be provided, the development should be refused.

The modification 10.14 which adds a new paragraph under the heading Transport Assessment, starting with the words “*Planning applications will*” should also make reference to the Transport Delivery Plan 2040 as some new developments will not be covered by Appendix D.

The modification 10.14 which adds a second new paragraph under the heading Transport Assessment, starting with the words “*Planning applications which are required*” is ineffective and unsound as there is no requirement to reduce reliance on HGV road traffic. The air quality impact on Holcroft Moss could be addressed by the introduction of sustainable freight transport options in key locations that are likely to trigger this criterion. In addition, there is no clear guidance about how such scheme-specific measures will be assessed.

The modifications to this policy should also include the seven new paragraphs that have been included in the reasoned justification (mentioned in MM10.13) to make them (and the policy) effective and sound.

## Introduction to Strategic Allocations

### MM11.1 (Reasoned Justification Allocations)

The modification 11.1 at paragraph 11.2 states that the land supply is “*updated annually*”. In addition, NPPF paragraph 31 and the [Guide for Local Plan Examinations](#) (paragraph 1.12) highlight the importance of up to date evidence, including data relating to development needs and land availability, which should be updated as necessary to incorporate the most recent available information. The Existing Land Supply identified for office, industrial/warehousing and housing development should, therefore, be replaced by the most up to date information (2023).

The modification MM11.1 which introduces a new paragraph after paragraph 11.2 appears to suggest that further Green Belt release may be required within Local Plans. This is inconsistent with the messaging throughout the evolution of this plan, as set out in the Green Belt Topic Paper (07.01.25) submitted as part of the plan, which states that to “*avoid 10 districts proposing further amendments to the Green Belt in Local Plans it is proposed that this will be the only opportunity to make changes*”. Such a major change of approach should be subject to further consultation.



### Strategic Allocations in Trafford

#### MMTr2 Picture 11.48

Graphic 11.48 appears to suggest that all of the land included within this allocation is required to follow the policies within this plan. This is incorrect and has resulted in significant ambiguity and confusion, which is discussed in the paragraphs below (and in our attached New Carrington Justification document). The graphic is, therefore, ineffective and unsound.

The graphic (picture 11.48) shows one of the link roads going through the middle of an area which is designated as a strategic green space. According to criterion 31 of Policy JPA33, such spaces should be “*protected from development*”. The construction of a road here will require the felling of thousands of trees, the draining of wet woodland habitat and will cause damage to the area known as the Manchester United Reserve, causing a huge impact to the ecology and biodiversity of the area, and the populations of red listed birds and endangered wildlife (including protected species). The Indicative Allocation Plan graphic should be updated to ensure compliance with policy criterion 31 as the current version of the graphic renders the policy ineffective and, therefore, unsound.

In addition, graphic 11.48 shows a different route for the Carrington Relief Road to that on Figure 4.8, once again causing ambiguity and confusion.

Much of the pink and purple areas (and some of the land in Partington East) already has planning permission and are **NOT** subject to the policies set out in this plan. PfE cannot determine (for example) the densities or affordable housing to be applied in any of those developments, nor the employment “use type”. This makes the allocation ineffective and unsound.

As suggested previously to the planning inspectors, the allocation should be split into specific geographical areas, so developers and communities are clear about which policies apply. Where the policies of this plan do not apply, that land should be removed from the allocation. The remaining Green Belt part of the allocation should be devolved to the upcoming local plan to enable a genuine assessment of each geographical element against agreed site selection criteria, the production of an ecological assessment (which has not yet been provided) and a more comprehensive understanding of the impact of the development on local communities.

The inclusion of the brownfield land in this allocation area has already introduced ambiguity about which policies should be considered for planning applications that are currently being processed, including one example that falls within the purple employment use area shown in this graphic.

In this example, to support the planning application for a proposal to completely fell a whole woodland site of biological importance and replace it with a 22m high warehouse, the developer comments (Emery letter 109755/OUT/22) that PfE “*proposes to allocate a quantum of employment land significantly higher than past take-up rates based on the need to address qualitative issues in the market, in particular the need for large-scale logistics*”.

When considering PfE as a whole, GM has more than sufficient employment land supply to ensure sites of biological importance are not prioritised for development. In fact, GM has added a **65% buffer** to its warehousing land supply to facilitate the release of Green Belt sites for the provision of such requirements.

Having made the claim that B2/B8 warehousing space is essential to sustaining southern competitiveness, paragraph 6.21 of the 109755 Planning Statement highlights (in relation to the Green Belt land to be released within this allocation for employment purposes) that “*CE3A (land south of Lyondellbasell) largely falls within the Lyondellbasell inner COMAH zone and a large-scale unit (i.e., in excess of 250,000 sq. ft / 23,225 sqm) would not be possible*”.

This suggests that it is unsound for the Green Belt land at CE3A to be released as it will not support the size of development required. This is also true of any other Green Belt land in the region which cannot deliver large-scale logistics.



All such sites should, therefore, be considered unsound and removed from the plan as there are sufficient brownfield sites in the existing land supply to deliver warehousing units, including large-scale logistics.

The planning application mentioned above does not comply with (for example) the Trees and Woodland policy in this plan (JP-G7) which requires (criterion 12) that, where development would result in the loss of existing trees, replacement is made *“on the basis of two new trees for each tree lost”*, and other policies in this plan. Neither does it comply with the policies in the current Local Plan. The developer has used the ambiguity generated by the confusion caused by the inclusion of such sites in PfE for their own benefit.

### MMTr3 JPA33 Policy

There is a lack of clarity in many of the policies, which have been weakened by modification to this and other policies in the submitted plan, introducing huge levels of ambiguity and confusion. As a consequence, and for the reasons set out in the paragraphs below, we believe this policy is unsound and that this allocation should be removed from the plan.

The deletion of criteria 3, 4, 5, 10, 24, 36, 41, 44, 45, 46, 47, 48, 50 and 51 are not required for soundness purposes and weaken the overall policy, removing important signposts and messaging for developers and communities. All should be reinstated in the policy.

The modifications to criterion 1 are ineffective because they do not reference that the masterplan and delivery strategy must incorporate the *“Necessary Transport Interventions”* set out at Appendix D. The modification should also confirm that the masterplan will ensure the delivery of sustainable growth (as this has been removed with the deletion of criterion 12).

Whilst we welcome the reference in the modification to consideration of opportunities to restore habitats, strengthen ecological networks and manage the carbon and hydrological implications of the development, the proposed schemes will, as advised by Natural England, *“cause permanent damage”* and *“will destroy a much larger area of habitat than the actual footprint of development due to hydrological dependency/linkages”* (see our attached document New Carrington Justification). It is clear that, constructing housing, warehousing and roads on, across, through and around 335 hectares of peatmoss and sites of biological importance, will be damaging and destructive, especially given the drainage required to make development possible. The policy is not clear about what happens if the proposed development will destroy rather than benefit the ecology and biodiversity. The modification should make it clear that in those circumstances, development will not be approved. The current ambiguity makes the criterion further ineffective and the policy unsound.

In relation to the new criterion *“Have regard to the relevant Health and Safety Executive’s consultation zones and Land Use Planning advice”*, given the importance of this issue, the term *“have regard to”* is not a strong enough phrase, the term *“in accordance with”* should be used to make the modification effective and sound. A response to a recent FOI request revealed that the inner zone for one of the hazardous businesses in Carrington is the *“spontaneous ignition distance within which combustible materials would catch fire in the event of a BLEVE [boiling liquid expanding vapour explosion] fireball”*. The document continued to identify the impact of such an event, which *“is assumed to lead to around 50% fatalities, for a normal population”*. It is, therefore, essential that adherence to this advice is given the highest level of scrutiny and importance.

Whilst we do not oppose the removal of parts of Criterion 2 to the reasoned justification, the modification does not make it clear that the overall number includes housing that already has planning permission. As it could be read that the allocation intends to develop 5,000 homes from the point of adoption of PfE, this criterion should be updated otherwise it is ineffective and unsound.

In relation to the modifications to criterion 6, we have set out our commentary about picture 11.48 in our response to modification MMTr2 above. It should be made very clear that this plan cannot influence the densities of those areas which already have planning approval or those brownfield sites which are being pushed forward in advance of Places for Everyone being adopted.



There is no indication of the proposed densities in the Strategic Housing Land Availability Assessment. This criterion, therefore, makes the policy ineffective and unsound.

In relation to criterion 7, again, this plan cannot influence the proportion of affordable housing for those sites which already have planning approval. Given that planning applications relating to land that is currently designated as Green Belt are expected to come forward immediately following adoption of this plan (in direct conflict with objectives 2 and 3), the reference to provision “*in accordance with local policy requirements*” is likely to lead to considerable confusion, ambiguity and negotiation by developers to reduce the requirements on their specific plots of land. There is no clarity in the policy about what happens if insufficient provision is made in early applications, leaving later schemes to meet the expectations of this policy criterion. We believe this criterion is, therefore, ineffective and makes the policy unsound.

Criterion 9 does not clarify that this figure includes the land that already has planning permission and the brownfield land that is being pushed forward for development in advance of PfE being adopted. As it could be read that the plan expects delivery of 350,000 m<sup>2</sup> from the point of adoption of PfE, this criterion should be updated otherwise it is ineffective and unsound. This plan cannot influence the “use type” for land that already has planning permission or land that is being pushed forward for development in advance of PfE being adopted, again making this criterion ineffective and the policy unsound.

In addition, in relation to criterion 9, as mentioned in our response to MMTr2, a developer has confirmed, in a recent planning application, that the Green Belt land to be allocated for warehousing development at New Carrington is unsuitable for the provision of the large-scale logistics units required. This suggests that it is unsound for the Green Belt land at CE3A to be released, the Green Belt land proposed for the development of employment opportunities, is, therefore, unsound and should be removed from the policy.

Criterion 11 should be retained as its removal significantly weakens the policy. It is not sound to make this change as Local Labour Agreements are not mentioned in the thematic policies but are a requirement in the KPIs. This suggests that this criterion should be added to each of the allocations and should also be a requirement for brownfield developments (so should also be included in the thematic policies). In addition, in relation to criterion 11, the creation of local employment and training opportunities is a key component of regeneration supporting the local deprived communities of Partington, Carrington and Sale West (see paragraph 11.328).

Criterion 12 should be retained or the reference to ensuring sustainable growth should be included in criterion 1. The removal of this criterion weakens the policy, making it not positively prepared, and, therefore, not sound.

The change to criterion 14 significantly weakens the policy. Prioritising cycling, walking and public transport over the private car is critical to achieving plan objectives 2, 6 and 7 (and to a degree, objective 5). This change should also have been covered in the updated Integrated Assessment.

We believe the modifications to this criterion 14 make the policy ineffective and, therefore, unsound. The new wording is weak and ambiguous (especially as JP-C7 has also been weakened and there are new paragraphs in the reasoned justification that should be promoted to the JP-C7 policy). The criterion should make it clear that the “*Necessary Transport Interventions*” (set out within Appendix D) are all critical to the delivery of the allocation (they MUST be delivered, not just have regard to). There should also be reference to the funding for the “*Necessary Transport Interventions*” and what happens if insufficient funding is available to fulfil this criterion. Appendix D does not indicate any prioritisation of sustainable passenger transport or active travel (nor does it include any sustainable freight transport options, despite the former railway line within the allocation area and proximity to the Manchester Ship Canal), so it is critical that the prioritisation of active travel and sustainable transport is set out within the policy criterion.

Despite the very long list of “*Necessary Transport Interventions*” in Appendix D, criterion 19 singles out the Carrington Relief Road as a specific item to be delivered. The changes remove all the other transport links, although they too are listed in Appendix D. This suggests that the rest of the list at Appendix D is not as important as the Carrington Relief Road, including those mentioned in criterion 20 (which is deleted in its entirety).





This is incorrect as all are considered to be “*Necessary Transport Interventions*”. Criterion 19 should be deleted as it is ambiguous and confusing, making it ineffective and unsound.

Given the size of the development here, the criterion 23 proposal to deliver school places offsite is not a sustainable solution, making the policy unsound. The lack of public transport and the increasing amount of traffic on local roads will mean that a large number of additional children will be driven to their schools. In addition, NPPF paragraph 95 states that “*It is important that a sufficient choice of school places is available to meet the needs of existing and new communities*”. Creating distance between homes and schools causes huge issues with access, due to catchment and admissions policies. The modifications make this allocation policy ineffective and unsound.

The deletion of criterion 24 is not needed for soundness purposes and it is essential that, in line with the presumption in favour of sustainable development, the requirements of NPPF paragraph 20 are met. Having to access healthcare facilities offsite is, once again, not a sustainable solution.

Criterion 25 introduces the word “publicly” to indicate that the general public should be able to access the significant green corridor that remains in the Green Belt. Yet, much of the area of retained Green Belt is **NOT** publicly accessible, it is owned by various commercial and sports businesses, farms and riding stables and areas where it is not desirable to increase human/domestic pet footfall (such as the Wetlands at Carrington Moss SBI). Whilst we recognise that some aspects of this “*public access*” will be addressed in the Masterplan workshops, more guidance is needed in this plan to ensure there is clarity for developers, landowners and communities. This criterion is ineffective and unsound. It may help to include a graphic in the plan which sets out the areas that will actually be “*publicly accessible*”.

Whilst we do not oppose the modifications to Criterion 26, we believe it should clarify that those “*physical features*” should be natural (ie not the built environment) to ensure the modifications are sound.

The modifications weaken criterion 27, which needs to be strengthened given that JP-G2 has also been significantly weakened, making the policy ineffective and unsound. Given the size of the New Carrington allocation, there is no justification to create benefits outside of the allocation area. We, therefore, feel it is unsound to weaken this criterion by removing the words “*Mitigate any impact*” and to suggest that compensatory improvements should be made “*in the vicinity*” of the site. Furthermore, the policy should indicate the key principles of the compensatory improvements to ensure these are clear and understood prior to planning applications coming forward.

The modification to criterion 30 (removing the words “*within the allocation boundary*”) means that there is now no geographical limit to where such spaces should be provided. To make this criterion effective and sound, the words “*within the allocation boundary*” should remain in the criterion.

As mentioned in our commentary about picture 11.48, the graphic shows one of the link roads going through the middle of an area which is designated as a strategic green space. According to criterion 31, such spaces should be “*protected from development*”. The construction of a road here will require the felling of thousands of trees, the draining of wet woodland habitat and will cause damage to the area known as the Manchester United Reserve, causing a huge impact to the ecology and biodiversity of the area, and the populations of red listed birds and endangered wildlife (including protected species). The Indicative Allocation Plan should be updated to ensure compliance with this policy criterion as the current version of the graphic renders the policy ineffective and, therefore, unsound.

Criterion 32 has been significantly weakened by the modifications, making it no longer effective as there is now no requirement to protect and enhance natural environment assets. It seems only some of the SBIs will be taken into “account” (as there are more than 8 within and adjacent to the allocation area), making the wording ineffective and unsound. The removal of the words “*and adjacent to*” are not required for soundness purposes and they should be reinstated. In addition, this criterion does not now provide the level of protection that would meet requirements of the local authority enhanced biodiversity duty introduced by the Environment Act 2021, meaning it is inconsistent with national policy and, therefore, unsound.

As an example of the importance of strengthening this criterion, it should be noted that the northern part of the Grade A SBI (Wetland at Carrington Moss) is currently the subject of a planning application to completely fell the whole woodland in the SBI and construct a 22m high warehouse.



This is contrary to the draft policies in this plan, the policies in the existing local plan and government guidance. It is, therefore, critical that this criterion is significantly strengthened to ensure it is effective in protecting and enhancing these important assets.

The Green Belt land within this allocation area comprises peat moss, Grade 2 agricultural land, woodland and wetland habitats, yet, there are **NO** biodiversity/ecological assessments related to New Carrington in the PFE evidence base and there is no definition in the plan about what constitutes an appropriate assessment. We believe this makes the allocation of the Green Belt land at New Carrington unsound as there is no understanding of the level of impact and harm to the ecology and biodiversity, contrary to government guidelines, including (among many others) NPPF paragraphs 174, 175, 179 and 180 (see our attached document New Carrington Justification).

With this in mind, whilst Policy JP-G9 has also been weakened, making this criterion more likely to be ineffective and, therefore, unsound, it does require that “Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PFE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process”. In addition, paragraph 8.53 states that “Development will ordinarily be directed away from valuable soils, unless robust evidence in accordance with relevant government and other guidance indicates otherwise, and the Plan’s strong preference for brownfield development will assist in this”.

We believe that the New Carrington development will cause significant harm, particularly in relation to huge increases in air pollution, to the Manchester Mosses SAC, directly conflicting with the new criterion (after criterion d) in policy JP-G9, meaning the presumption in favour of sustainable development should not apply, as set out in NPPF paragraph 182.

It is clear that the developments proposed on the Green Belt areas in this allocation are not, therefore, in alignment with the objectives, the policies nor the reasoned justification in this plan, making the policy unsound. Please see our attached New Carrington Justification document for the implications of these inconsistencies.

Whilst we welcome the new criterion (after criterion 32), it will be ineffective and, therefore unsound for the following reasons:

- Given that there is no evidence that this plan has allocated the land *“with the least environmental or amenity value”* in GM (in accordance with NPPF 175), JPA33 should be subject to a Preliminary Ecological Appraisal prior to formal allocation within the plan
- The modification does not take into account the size of the peat extent (335 hectares), which will make it difficult to avoid the deterioration or loss of the irreplaceable habitat
- The modification does not consider the opportunity to reduce the size and scale of the development to limit the loss or deterioration of the irreplaceable habitat
- The modification does not take into consideration the advice of Natural England
- The modification does not explicitly define what would constitute the principles of a suitable compensation strategy for the loss, destruction or deterioration of an irreplaceable habitat. The modification does not set out who/which organisations will be involved in the identification and delivery of such a compensation strategy. It is not effective (and is, therefore, unsound) to leave such an important issue to be negotiated when planning applications come forward.

The modifications to criterion 33 are also ineffective (and, therefore, unsound) for the following reasons:

- Policy JP-G2 has been considerably weakened by the modifications that remove the list of Green Opportunity Areas to the reasoned justification and undermines other paragraphs in the policy
- The objectives of the Great Manchester Wetlands Nature Improvement Area will not be able to be delivered on land that has been extensively drained to accommodate huge amounts of housing, warehousing and a number of new roads.

There should be a modification in criterion 37 to include the word “New” before Carrington to reflect that this criterion applies to the whole of the allocation area.



The modifications to criterion 38 are not effective (and are, therefore, unsound) as they do not address the interface between new development and the surrounding countryside, which JP-G1 states is of “*particular importance*”. To tackle this, the policy should include a maximum height for warehousing, which reflects the landscape characteristics of the area. The planning application mentioned elsewhere in our response is proposing 22m high warehousing within the allocation area (on an SBI). This is totally contradictory to the key characteristics of the mossland and lowland farmland landscape. Furthermore, the modification which changes the emphasis relating to Dunham Massey and Warburton (from “*including*” to “*particularly*”) appears to suggest that it is not as important to respect the landscape characteristics of other parts of the allocation area, which is clearly incorrect and unsound.

The modifications to criterion 43 significantly weaken the policy, especially as thematic policy JP-P2 has also been significantly weakened through modification. Whilst we recognise that the assessments undertaken suggest that the area of highest archaeological potential is land to the south of Partington and to the west of Warburton Lane, which has been identified as a potentially significant medieval deer park, it is ineffective (and, therefore, unsound) for the modifications to suggest that one part of the allocation area is more important than others, especially given the preservative features of peatland.

In addition, the modification to paragraph 11.346 which suggests that “*Further archaeological investigation and a Heritage Impact Assessment will be required as part of future planning applications*” should be included in the policy rather than the reasoned justification.

The removal of the second and third sentences within criterion 49 is not necessary for soundness purposes and both should be reinstated as this is a critical issue in relation to development in the allocation area. A full and detailed assessment of the site will be needed as the level of water capture that is currently provided by the Green Belt area scheduled for release in this plan is extensive. Trafford’s assessment in the Carrington Relief Road Option Appraisal document confirmed that Option F (the route across Carrington Moss) will require “**2.5 times more water storage**” than the alternative.

In relation to the final new criterion, the Joint Minerals Development Plan includes peat, the extraction of which is covered in Policy 7 of that plan and should be referred to in this modification.

### MMTr4 JPA33 Reasoned Justification

The deletion of paragraphs 11.324, 11.328, 11.342, 11.347 are not needed for soundness and those paragraphs should be reinstated.

The modification at paragraph 11.320 does not confirm that the allocation area includes sites that are not required to follow the policies within this plan as they already have planning permission or are being pushed forward in advance of the Places for Everyone Plan being adopted. As stated in MMTr3, this is resulting in ambiguity and confusion, making the policy ineffective (and, therefore, unsound).

In relation to the new paragraph (after 11.321), we disagree with the planning inspectors’ conclusions that, “*in principle, the public benefit arising from the development proposed would be likely to clearly outweigh the loss or deterioration of an irreplaceable habitat*” for the reasons set out in table attached as **231205 JPA33 Benefits v Harms** and in our attached paper **231205 New Carrington Justification**.

That document concludes that the New Carrington allocation, as currently proposed, is not positively prepared, is ineffective, unjustified and not compliant with national policies. It is, therefore, unsound and the planning inspector’s main modifications do not make it sound.

Following the Hearings and a review of all the evidence submitted, the planning inspectors stated, in relation to the New Carrington allocation, that “*The allocation would make a very significant contribution to Trafford’s housing and employment needs, as well as contributing to the strategy of sustaining the competitiveness of the southern areas*”.



We disagree and, in making this statement, we do not believe the planning inspectors have taken all the relevant evidence into consideration. We are particularly concerned that the planning inspectors gave an inexplicably high weighting to the amount of market housing and warehousing proposed and did not give sufficient weighting to the government's commitment to protecting and enhancing the Green Belt, to the climate mitigation requirements, nor to the vast peat extent and, therefore, to the huge, irreversible impact to be caused by the proposed development.

We note, for example, that, to be found sound, the NPPF (paragraph 68) only requires sufficient land supply to be identified for the first 15 years of the plan, not for the whole plan period. In addition, national policy (paragraph 74) only requires a buffer to be added to the 5-year figure, not the whole of the land supply. In the first 15 years of the plan, Trafford is able to meet its government housing need figure, without releasing Green Belt. There is a buffer of over 20% applied to its 17-year figure, which includes the allocations.

Furthermore, PfE does not take large/medium windfall into account, despite acknowledging that such sites will continue to come forward. Windfall is estimated to account for over 10,000 units per annum across the plan area and over 1,000 units per annum for Trafford. The implications of this are set out in our attached document, New Carrington Justification.

NPPF paragraph 31 states that the "*preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*" and the [Guide for Local Plan Examinations](#) suggests (paragraph 1.12) that evidence base documents "*should be updated as necessary to incorporate the most recent available information*".

Whilst accepting that the GMCA has followed the government's standard methodology, the planning inspectors should have taken the Census 2021 data into consideration when assessing housing need. Their evaluation should have reflected the verification (demonstrated in several iterations of ONS data) that population growth expectations have fallen considerably since the government's 2014-based dataset was produced.

As an example, at a Greater Manchester level, GM's household growth figure for 2021 was projected to be 100,626 in 2014 - the Census actual was **50,034** (only 50% of the figure projected in 2014). For Trafford, the over-statement of housing need is even more stark. The household growth figure for 2021 was projected to be 10,040 in 2014 – the Census actual was **1,816** (only 18% of the figure projected in 2014).

In addition, SHLAAs have been submitted by each district in the plan area, the total of these lists of previously developed land exceeds the government's housing need figure. Planning Practice Guidance states that such data should identify "*a future supply of land which is suitable, available and achievable for housing and economic development*" (PPG: paragraph: 001 Reference ID: 3-001-20190722).

The plan is, therefore, able to meet its "*significant flexibility allowance*" (paragraph 7.16) and to deliver "*balanced and inclusive growth, thereby achieving the overall spatial strategy*" (paragraph 7.12) from within existing land supply, without releasing any Green Belt.

Furthermore, Greater Manchester has received significant public monies, including under [GM's deeper devolution deal](#), to regenerate brownfield land.

This should enable that "*suitable, available and achievable*" existing land supply, which exceeds the government's over-stated housing need figure, to deliver Plan Objectives 2 and 3 ("*Prioritise the use of brownfield land*"), rather than unnecessarily releasing environmentally-rich Green Belt for development on the day the plan is adopted.

The following should also have been taken into consideration:

- the brownfield land within the allocation area that **already has planning approval** (see below) delivers a significant proportion of the proposed development contradicting the assertion that the "*allocation would make a very significant contribution to Trafford's housing and employment needs*"
- the minimum Affordable Housing requirement for the allocation is extremely low at just 15% (much lower than Timperley Wedge, for example, at 45%) and can only be enforced in the allocation areas where planning approval has not yet been given





## Friends of Carrington Moss

- warehousing land supply estimates use a flawed methodology which does not take into consideration the negative net demand for B1 & B2 floorspace (a figure that exceeded the positive net demand for B8 storage), this figure should have been incorporated within the land requirement calculations
- in addition, Greater Manchester has added a 65% buffer to the warehousing land supply (a calculation that *"falls well outside the bounds of what has been generally used elsewhere"* according to the GMCA's own expert evidence – see paragraph 5.9; document 15, GMSF 2020)
- a recent planning application (109755) confirmed that the Green Belt land at New Carrington cannot support the size of warehousing development required in Greater Manchester.

We have repeatedly been told, throughout the spatial planning process, including in relation to the evidence we have submitted, that the plan should be considered *"as a whole"*. So, it is also incongruous that Trafford's specific housing and employment needs are given so much weight in this decision. Nevertheless, we believe the paragraphs above demonstrate that the Green Belt land in New Carrington does **NOT** materially impact either Trafford's housing and employment needs, nor the strategy of sustaining the competitiveness of the southern areas.

In addition, the data demonstrates that the initial criteria set out in the Site Selection paper (03.04.01, page 14) *"Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt"* has been met, that Green Belt should not have been released in Trafford and that the case for exceptional circumstances that result in the release of Green Belt has not been made.

Given that GM's ability to exceed the government's housing need figure already provides a huge *"flexibility allowance"* within existing housing land supply (without the release of Green Belt) and that the warehousing land supply has been inflated beyond accepted good practice, the planning inspectors should have given much more weight to the loss or deterioration of 335 hectares (a huge area) of peatmoss, Grade 2 agricultural land, woodland and wetland habitats.

The planning inspectors go on to say that the allocation would *"also involve substantial regeneration of previously developed land, bringing with it associated social and environmental benefits. This is all consistent with the strategic objectives set out in policies JP-Strat9 and JP-Strat11"*.

It is true that the allocation includes a significant area of brownfield land that is expected to support the regeneration of Carrington and Partington. That brownfield land delivers a significant proportion of the allocation's housing and employment requirements (approximately 1,200 of the 5,000 dwellings and 250,000 m<sup>2</sup> of the 350,000 m<sup>2</sup> employment space). That brownfield land, however, already has planning permission and those developments are **NOT** required to comply with the strategic objectives or the policies in this plan. PfE cannot, therefore, determine the level of affordable housing or density to be delivered, nor, for example, the "use type" for employment purposes.

It is clear that, whether or not the Green Belt components of this allocation are progressed, the *"substantial regeneration"* should be delivered by those approved brownfield developments, many of which have either already commenced construction or are completed. This issue should not, therefore, have been considered material when making the decision about JPA33.

The planning inspectors went on to assert that *"The wholly exceptional reasons required by paragraph 180c are therefore also met in this case"*. We disagree. There is nothing *"wholly exceptional"* about delivering the public benefits of development that already has planning approval, is already in place and for which the public benefits were tested elsewhere, some time ago.

In addition, the NPPF makes it quite clear that those *"wholly exceptional reasons"* would be for developments such as *"infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills)"*. This is not what is being considered at New Carrington, there are no plans to, for example, introduce sustainable freight transport, which might be considered to fall within the bounds of those criteria.





Furthermore, Natural England (NE) wrote to the planning inspectors in June 2023 (OD42), providing insights in advance of the specific Peat Hearing on 5<sup>th</sup> July. NE mentioned, in relation to compliance with paragraph 180(c), that there is extensive and restorable deep peat within allocation JPA33, that the deep peat should be considered to be an irreplaceable habitat, and that, *“at JPA33 the combination of the location and the extent of development proposed by the allocation policy means the proposed development is incompatible with avoiding the deterioration of this irreplaceable habitat”*.

NE highlighted that there were differences in the views of those involved in the Statement of Common Ground about the extent of the restorable deep peat within the New Carrington allocation boundary. NE believe there is c335 hectares of restorable deep peat on the site, of which 105 hectares are proposed for development. This is a huge area of irreplaceable habitat that is at risk of deterioration or complete loss and should have been given significant weight in considering whether the *“wholly exceptional reasons”* had been met.

NE’s view, set out in OD23, is that the development will not only prevent future restoration but *“will cause irreversible damage to the body of peat directly under the developed land and the wider peat mass, which depends on the continuity of the flow of water”*. They go on to recognise that the degradation of the peat mass will also result in significant greenhouse gas emissions.

NE confirmed (in OD42) that their position is in line with the England Peat Action Plan, that there should be no development on (restorable) deep peat, and that peat should be kept wet and in the ground. NE drew attention to their *“extensive experience of peatland restoration projects”* which provides considerable credibility to their professional judgement in this matter.

We, therefore, disagree that the *“wholly exceptions reasons”* required by paragraph 180(c) have been met.

The planning inspectors went on to state that *“There is also a reasonable prospect of a suitable compensation strategy being able to be delivered within the allocation as a whole and that the policy can be modified to be effective in ensuring this is delivered”*.

The PPG (paragraph: 033 Reference ID: 8-033-20190721) states that when assessing whether ‘wholly exceptional reasons’ exist that may justify a loss or deterioration of, in their example, ancient woodland, ancient trees or veteran trees, *“it will not be appropriate to take any compensation measures into account. These should be considered only once the existence of ‘wholly exceptional circumstances’ has been ascertained”*.

So, the issue of whether or not there is a *“reasonable prospect of a suitable compensation strategy being able to be delivered”* should be immaterial to the consideration of the public benefit to be delivered by the scheme.

Furthermore, [DEFRA has stated](#), in relation to irreplaceable habitats, that the *“planning authority must be satisfied that as a minimum, the compensation plan meets requirements in relevant policy and guidance and delivers appropriate compensation which **should aim to reflect the same type of habitat that was lost**”* and that the *“legislation will also set out that off-site biodiversity units and statutory biodiversity credits cannot be used to compensate for the loss of irreplaceable habitat”*. For New Carrington, the loss of, or damage to, circa 335 hectares of peatland, a huge area to compensate for, especially given that, as highlighted by Natural England at the peat Hearing, peat can only be generated on a peatland base.

In addition, if the level of Green Belt release is approved as currently proposed, much of the remaining area of peatland is not accessible for compensation options (the land is privately owned and used or rented by, for example, sports clubs (Manchester United, Sale Sharks, Sale Rugby FC), United Utilities, the Solar Farm, National Grid, riding centres and other farms).

Furthermore, Appendix D sets out a number of *“Necessary Transport Interventions”*, including 4 major new roads that will be constructed on, across and around the peat moss, not only appropriating considerable land areas, but also requiring significant drainage (which will extensively impact the remaining mossland) and substantial tree-felling (to be replaced on a 2:1 basis in compliance with JP-G7) to make way for their routes.

The SBIs and SSSIs on and around Carrington Moss will be significantly impacted by the proposed development of housing, warehousing and roads, including as a consequence of:



- drainage and other changes to hydrology to enable the development
- increased human and domestic pet footfall
- increased air, noise, light, vibration and water pollution
- loss of trees, vegetation and wetland habitats.

All-in-all, this suggests that, given the size and scale of the development, the lack of land available for delivery of a suitable compensation strategy within the allocation area and the damage to be caused, not only to the peat mass, but also to trees and woodlands and the SBIs/SSSIs, the required level of mitigation and compensation will be extremely high, so the “*reasonable prospect*”, suggested by the planning inspectors is unlikely to be deliverable.

In addition, the planning inspectors do not determine what the principles of a “*suitable compensation strategy*” for the loss or deterioration of such a huge expanse of peat moss would comprise and there is no indication of how or whether the loss of restoration potential and carbon sequestration opportunities should be taken into consideration. Such a critical issue should not be left to negotiation when planning applications come forward, as this will result in piecemeal, inappropriate solutions that set irresponsible precedents.

For the reasons set out above, we, therefore, believe that the planning inspectors were incorrect to suggest that the allocation meets the requirements of paragraph 180(c), that the allocation is not consistent with national policy, that it is unjustified and ineffective and, therefore, unsound.

The modification adding a second new paragraph (after 11.321) is not effective or sound as there is no indication, anywhere in this plan, that there is funding available to deliver the “*necessary infrastructure to ensure a successful, sustainable development*”. The “*high level, indicative phasing plan*” does not indicate the funding sources for the “*Necessary Transport Interventions*” set out at Appendix D. The deliverability of the site is not demonstrated. With this in mind, the allocation should be found unsound and removed from PFE, for reconsideration in a future Local Plan, once the availability of funding for the “*Necessary Transport Interventions*” is confirmed.

Should the planning inspectors not accept this rejection of the modification, the second new paragraph (after 11.321) should include reference to Appendix D in relation to the necessary infrastructure, to ensure there is clarity that it is the list of “*Necessary Transport Interventions*” at Appendix D that **MUST** come forward in advance of housing and warehousing developments. This new paragraph should also make reference to the inclusion of information on trigger points for when infrastructure, including road improvements, new schools and link roads will be required as this has been removed with the deletion of paragraph 11.330.

In relation to the new paragraph (after 11.323) which describes the picture 11.48, please see our comments in response to modification MMTr2 regarding this graphic. It should be noted that this plan cannot determine the density for land that already has planning approval or land that is being pushed forward in advance of Places for Everyone being adopted.

Please see our comments in MMTr3 in relation to affordable housing (11.326).

The modification at paragraph 11.327, which confirms that the employment development will be for B2/B8 uses, is not effective (and is, therefore, unsound) for the following reasons:

- the policies in this plan cannot be applied to land which already has planning approval (which is the majority of the employment land), or to land that is being pushed forward for development in advance of the adoption of Places for Everyone
- as set out in our response to MMTr2, the Green Belt land set aside for employment within JPA33 is not able to accommodate the need for large-scale logistics.

Given that GM has added a buffer of 65% to the employment land requirements, it is ineffective and unsound for the Green Belt land at JPA33 to be released as it will not support the size of development required.

The modification of paragraph 11.334 significantly weakens the statement. Given the size of the development at New Carrington, there is no justification for making this change for soundness purposes and it should be reversed to make the paragraph sound.



The modification at paragraph 11.340 should be consistent with the policy wording.

The modifications to paragraph 11.341 extensively weaken the wording. The words “*potentially*” and “*may be*” should be removed as the area **is** suitable for peat restoration and important wetland habitats. The advice of Natural England should be fully respected and followed. The statement that “*Much of the area which may be suitable for peatland restoration or wetland habitats is within the identified Green Belt gap*” is incorrect as shown in Appendix 1 of document GMCA89 in the PFE evidence base. In fact, over 100 hectares of the peat area is currently allocated for development (contrary to NPPF 175 and other government guidelines). In addition, some of that which is not allocated for development is not available for restoration (the Manchester United Training Ground, for example, and the areas set aside for new roads).

The modifications to paragraph 11.341 are also ineffective and, therefore unsound for the following reasons:

- Given that there is no evidence that this plan has allocated the land “*with the least environmental or amenity value*” in GM (in accordance with NPPF 175), JPA33 should be subject to a Preliminary Ecological Appraisal prior to formal allocation within the plan
- The modifications do not consider the opportunity to reduce the size and scale of the allocation to limit the loss or deterioration of the irreplaceable habitat
- Allusions to the hydrology of the area are contradictory because the land is currently very, very wet and would have to be extensively drained for housing, warehousing and roads, which would not be beneficial to the continued enhancement of the existing SBIs/SSSIs, nor the creation of new/enhanced wetland areas or the restoration of peat
- The modifications do not explicitly define what would constitute the principles of a suitable compensation strategy for the loss, destruction or deterioration of an irreplaceable habitat. The modification does not set out who/which organisations will be involved in the identification and delivery of such a compensation strategy. It is not effective (and is, therefore, unsound) to leave such an important issue to be negotiated when planning applications come forward.

Furthermore, the statement that “*New Carrington has the potential to be an important part of developing this Wetlands Ecological Network through the creation and restoration of wetland habitats and their designation in the Local Plan, where appropriate*” is inconsistent, given that it is listed as one of the Green Opportunity Areas. This should be changed to reflect Carrington’s role in supporting the delivery of this Wetlands Ecological Network. It should be noted that the objectives of the Great Manchester Wetlands Nature Improvement Area will not be able to be delivered on land that has been extensively drained to accommodate huge amounts of housing, warehousing and a number of new roads.

The modifications to paragraph 11.343 are ineffective and, therefore, unsound. The words “*have regard to*” are not strong enough given that this plan includes warehousing for which there is currently no maximum height limitation, despite the mossland and lowland farmland landscape characteristics. It is anomalous to suggest that specific parts of the allocation areas and the views “*south to Warrington and Cheshire*” are more important than those facing other directions. The whole of the Green Belt area is typical of the mossland and lowland farmland landscape character type and the resulting “*sensitivities*” should be considered across the whole allocation area.

The modification to paragraph 11.346 which suggests that “*Further archaeological investigation and a Heritage Impact Assessment will be required as part of future planning applications*” should be included in the policy rather than the reasoned justification.

The modification which deletes the sentence “*Other areas of the Carrington site which are of potentially high value include areas of peat where assessments to establish the depth and condition of any remaining peat will be required*” is not required for soundness purposes and should be reversed and retained in the plan.

The modification to paragraph 11.348 that deletes the sentence “*and if pumping stations are identified as necessary, the strategy will demonstrate how the number of pumping stations is minimised so to avoid a proliferation of pumping stations between phases*” is not required for soundness purposes and should be reversed and retained in the plan.



The modification to paragraph 11.349 that deletes the sentence “~~The brook currently has a rating of ‘moderate’ under the EU Water Framework Directive, and the development should seek opportunities to improve this to ‘good’~~” is not required for soundness purposes and should be reversed and retained in the plan.

## Delivering the Plan

### Monitoring

#### MM12.4 and MM12.5 (Monitoring)

The modifications MM12.4 and MM12.5 are ineffective and unsound as they do not set out a regime that will monitor the Vision, Objectives and Strategy of this plan.

This plan states explicitly that it is “*focused on delivering the ambitions in the Greater Manchester Strategy*”, which itself states that the most pressing issues for the city-region are “**responding to the interconnected challenges of climate change and inequality**”, that GM needs “**to act quickly on decarbonisation**” and that the “**refreshed Greater Manchester Strategy therefore puts the climate and equalities agendas at its heart**”.

This monitoring regime should unambiguously enable understanding of the level of compliance with the ambitions of the Greater Manchester Strategy. The modification to the Policy Outcome related to Affordable Homes is particularly weak and does not reflect a plan that fundamentally supports reversing the deepening of the inequalities “*we know have existed for many years*”. Removing the indicator that explicitly measures the number of people on housing waiting lists makes this monitoring regime ineffective and unsound.

In addition, given the importance of the restoration of our peat mosses to the achievement of the 2038 carbon neutral target and GM’s ability to mitigate the impacts of climate change, there should be an indicator that monitors progress in this, yet it is not even mentioned.

There are many other gaps in the monitoring of achievement of the Plan Vision, Objectives and Strategy, further examples are provided below:

- The modification which changes the Policy Outcome “*Prioritise brownfield land for development*” is ineffective and unsound as it is inconsistent with Plan Objectives 2 and 3 – the plan objectives do not aim to “*Maximise the use of suitable previously developed (brownfield) land for development*”. If there is to be a change to the Plan Objectives, this is a major change to the plan approach and should be subject to further consultation.
- The indicators relating to the Policy Outcome measuring the prioritisation of brownfield land should include % development on land previously designated as Green Belt that is approved for development prior to land listed on the SHLAAs (for both homes and employment premises)
- The modification which changes the policy outcome to “*No new homes and employment premises at risk of flooding*” is ineffective and unsound as it is inconsistent with Plan Objective 2 – existing homes and premises could be put at risk of flooding by new development, especially given the number of proposed developments on Green Belt areas that currently capture significant levels of surface water flooding.
- The modifications to the indicators to Improve Air Quality should include measures to monitor the Air Quality indicators set out in the Environment Plan (including particulate matter).
- The modification to the indicators to Provision of additional school places to support new development should include an indicator to monitor the number of complaints about access to and choice of school places (especially given NPPF 95, which emphasises the importance that “*sufficient choice of school places is available to meet the needs of existing and new communities*”)



## Friends of Carrington Moss

- Plan Objective 3 suggests there should be a diverse range of employment sites and premises – which is not proposed to be measured – creating warehousing estates on former Green Belt land is not creating diversity of job opportunities and the indicator for improving access to jobs (number of local labour agreements) has been removed from policy for New Carrington and Timperley and is not mentioned elsewhere
- The “Increase tree planting” policy outcome should include an indicator that measures whether trees lost to development have been replaced on a 2:1 basis.

Furthermore, the monitoring regime should set out explicitly how the achievement of the Plan Objectives that have been subordinated to the Local Plans will be scrutinised, measured and monitored (paragraph 12.25 does not make this sufficiently clear).

## Appendix A Replaced District Local Plan Policies

### Replaced Trafford Local Plan Policies

#### MMApxA.9 (Replaced Trafford Local Plan Policies)

The modifications to Trafford policies significantly weakens the existing Local Plan Policies, including, for example, the following:

- SL5.4 page 77 which states “In order for development in this Location to be acceptable the following will be required ..... The protection and enhancement of the mossland as a carbon sink to mitigate the effects of climate change”
- R4.5 page 176 “The Council will protect existing agricultural land as an important resource for Trafford’s local economy. In particular, the Council will seek to protect the Borough’s: (a) Richest soils located south of Carrington Moss (Settled Sandlands) for agricultural purposes”
- R4.7 page 176 “The Council will protect the following areas of open land (that are not included within the Green Belt) **from** development: (a) Land in Warburton (immediately to the south of Partington); and (b) Land south of Shell, Carrington”.

The removal of these and other protections set out in the existing Local Plan is not justified nor compliant with national policy and is, therefore, unsound (especially given the lack of evidence that the land with the least environmental or amenity value has been allocated - NPPF 175).

## Appendix B Additions to Green Belt

No comments

## Appendix C PfE Policies Map

No comments





### Appendix D Indicative Transport Mitigations

#### New Carrington MMApxD1

##### New Carrington MMApxD1

It should be noted that, entitling Appendix D “Indicative” when the lists include “Necessary” Transport Interventions is confusing and ambiguous.

Appendix D sets out the Necessary Transport Interventions which must be delivered to support the developments set out in each of the allocations in the plan - but the list is dominated by new road schemes. This is contrary to policy JP-C1, criterion 5, which requires that transport investment must follow a hierarchy which prioritises active travel and public transport.

There is no indication in the appendix or in any of the lists that active travel and sustainable transport options should be prioritised. Such an approach would also support the substantial carbon emission reduction requirements set out in plan paragraph 10.8, which states that “*action must be taken now*” and that “*significant reductions in carbon emissions from transport are vital in achieving*” the 2038 Carbon Neutral Target.

In addition, there is no indication in any of the PfE evidence documents that sets out the full list of anticipated costs related to Appendix D, neither has that information been made available via Freedom of Information Act requests. Without such data, it cannot be determined that the allocations are viable.

As an example, PfE submission document 03.01.04 (PfE Strategic Viability Assessment Stage 2 Allocated Sites Amendments) includes an assessment of the Strategic Transport Costs for New Carrington (Summary of Results, column H, page 134). The costs included are less than £56m, which does not cover the items listed at Appendix D. The costs related to Appendix D are not included in developer contributions of the Viability Assessment and also exclude the additional £4m set out in OD5.3 for the impact to the SRN.

PfE paragraph 10.10 highlights the five specific transport decarbonisation priorities that are set out in GM’s 5-year Environment Plan. The list includes “*Decarbonising road freight and shifting more freight movement to rail and water*”. This requirement is reinforced in paragraph 10.70.

Yet, despite national and regional transport policy, despite the huge volume of additional HGVs that will be generated by the planned developments and despite the proximity of the Manchester Ship Canal and the disused railway lines, there are no plans for sustainable freight at New Carrington.

There is also no committed/confirmed funding for the public transport initiatives listed (we checked this via an FOI request, which stated that there “*are currently no committed schemes to improve public transport in this area*”).

The Appendix D list for New Carrington does not, therefore, support Plan Objectives 2, 4, 6, 7 and 10. Neither does it enable Greater Manchester’s ambition to be net zero carbon by 2038. In fact, siting allocations in isolated locations like New Carrington will increase carbon emissions, motor vehicle traffic and air, noise, light, vibration and water pollution, contrary to national policies, the plan policies, the Greater Manchester Transport Strategy 2040 and legislation (including the Planning and Compulsory Purchase Act 2004, which requires that plans must include policies that “*contribute to the mitigation of, and adaptation to, climate change*”).

Siting development in isolated locations is more costly than facilitating schemes in more sustainable locations. Viability for New Carrington is, at best, marginal, and, as mentioned above, currently does not include the full list of costs required by Appendix D (our very conservative estimate for these costs is £400m). Appendix D does not include any sustainable freight transport solutions, and there is no confirmed funding for the public transport initiatives listed. These issues are just one of many factors that mean the allocation does not result in sustainable development.

The modifications, including this modification MMApxD1, do not address the lack of sustainability in the allocation, making it non-compliant with national policy and, therefore, unsound.