

Beyond the Fragile Geometry of Space

Places for Everyone consultation response

11 September 2021

This document is a response to the Places for Everyone Joint Development Plan regulation 19 consultation of 2021 by Save Royton's Greenbelt Community Group. It comprises an executive summary and our nine challenges to the soundness of the plan, along with five evidence papers.

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Background

Save Royton's Greenbelt was founded in Autumn 2016 to campaign against the thousands of homes and warehousing that were allocated in the Green Belt and on protected open land in and around Royton. Many local people believed it was excessive, disproportionate and unnecessary. Save Royton's Greenbelt organized the Tandle Hill protest that was attended by over 3,000 local people and featured on Granada Reports. As many people have joined our Facebook page and we submit this response on their behalf.



Our response to the Places for Everyone consultation is divided into a set of six papers. The *Executive Summary and Challenges to Soundness* paper outlines our main arguments and our nine challenges to the soundness of the Places for Everyone Joint Development Plan document and its supporting topic papers. The primary challenges are supported by five evidence papers. Our response comprises the following:

- *Beyond the Fragile Geometry of Space* : Executive summary and Challenges to soundness
- *Windfall* : Analysis of the housing land supply in the PfE area 2020–2037
- *Policy JP-H 4* : Could Greater Manchester be more dense?
- *Criterion 7* : Our case for unexceptional circumstances
- *Policy JP-J 4* : An analysis of PfE employment land supply buffers
- *Policy JP-Strat 7* : Over-saturation of the North-East Growth Corridor

Executive summary and Challenges to soundness

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Introduction

Nobody under-estimates the difficulty of reconciling the competing objectives involved in creating a planning document for the most populous conurbation in the UK outside of Greater London. Given the complex challenges that we must confront as a society, a joint approach across Greater Manchester has much to commend it. However, on the other side of Brexit, in the aftermath of a global pandemic, and amidst an escalating climate crisis, Places for Everyone (PfE), in its current form, is looking increasingly like a solution from another era.

The most contentious issue that has bedeviled PfE and its forerunner the Greater Manchester Spatial Framework (GMSF), since its inception in 2014, is the allocation of housing and industrial floor space in the Green Belt and on Other Protected Open Land (OPOL). The destruction of green space seems entirely inconsistent with what we should be doing in the face of an escalating climate crisis. Since the last consultation in 2019, all ten districts of Greater Manchester have declared climate emergencies. The plan in its current form does not seem to recognize the emerging priorities, and is looking increasingly old hat compared to other emerging plans that are creating carbon emission models to aid their planning decisions.

The plan takes the easy route and, in contravention of the National Planning Policy Framework (NPPF), has not fully explored all reasonable options for meeting the identified need for development. There is a strong historical trend of large windfall sites coming forward in Greater Manchester but the plan makes no allowances for this, despite the fact there are no projected deficits before 2030 in the land supply trajectories. Despite being an integral component of the spatial strategy, the minimum density specifications are also not being fully delivered, which has the knock-on effect of placing more pressure on the Green Belt and undermining the core objectives of the plan.

In the case of industrial and warehousing land a switch to using past completions rather than economic forecasting to predict future employment space needs has led to a reduction in identified need, but this has not been accompanied by a reduction in allocations in the Green Belt. After factoring in the allocations, the plan has a 75 percent surplus of industrial and warehousing floor space. We cannot see the justification for this, and more importantly PfE makes no attempt to provide any.

Given that Greater Manchester aims to be carbon-neutral by 2038, this must be the plan that takes us there. Government policy is explicitly clear about how this should proceed; there is an emerging body of empirical evidence showing that increasing densities close to town and city centres and in areas well served by sustainable public transport is the most carbon efficient model for development. A high density approach in the City Of Manchester is already proving to be very successful at meeting housing targets, but the failure to expand sufficient upscaling to the boroughs is compromising Government policy and undermining our commitment to tackling climate change.

Growth and Spatial Options

PfE houses two strategies to deliver its objectives: a “growth” strategy and a “spatial” strategy. The growth strategy is concerned with the overall quantum of provision for housing and industrial floor space, while the spatial strategy is concerned with the geographic distribution of development.

There have been three broad options for the growth strategy: i) match provision to the baseline supply; ii) meet the objectively assessed need (OAN) for housing and employment space; iii) pursue a higher growth strategy. As with the 2019 draft of the GMSF, PfE has opted to deliver the OAN.

With regard to the spatial strategy five spatial options were considered:

- Option 1 – Business as usual
- Option 2 – Urban Max
- Option 3 – Public Transport Max
- Option 4 – 2019 Spatial Option
- Option 5 – Decentralisation/Sub-urbanisation

PfE has retained the 2019 Spatial Option from the GMSF which had four key components:

- Optimising the baseline housing land supply, to ensure all opportunities to increase densities and identify additional sites have been explored;
- Concentrating development near to town centres and/or sustainable public transport hubs;
- Taking advantage of existing and planned global assets; and
- Delivering inclusive growth across Greater Manchester, seeking opportunities to boost the competitiveness of north Greater Manchester.

The “Business as usual” option was incompatible with the growth option. However, “Urban Max” could deliver the requisite amount of housing by just utilizing the baseline supply to employ high-density formations in and around town centres. The “Public Transport Max” option extended these high-density formations to sites close to sustainable transport hubs. Unlike the 2019 Spatial Option, neither of these two options anticipated Green Belt release.

Therefore it is the spatial option that shapes the argument for allocating housing in the Green Belt, rather than the growth option. The case for altering the Green Belt boundaries with respect to delivering the OAN must be made in the context of the selected spatial option. If the planning authority cannot do this then the Green Belt release is arguably not justified by the terms of the plan, because there are at least two other spatial options that can deliver the OAN without Green Belt release.

Housing targets

Perhaps one of the most intriguing and innovative aspects of PfE (and the GMSF before it) is that it does not set housing targets on a “per district” basis, but rather it takes a county-level view and distributes the targets in such a way that they do not always match the local housing need. This approach subverts the conventional wisdom of building housing where there is a need, and adopts an “If you build it, they will come” philosophy. By rejecting a parochial view of housing provision, PfE becomes more than just a plan for homes and jobs, but also a plan for people. However, if a plan is to regard people as a variable rather than a constant, it is essential that they are consulted and their consent is obtained.

With this in mind, the GMSF put a question to the residents of Greater Manchester: should land be pooled with the view of optimizing living space, and thus improving access to economic opportunities and sustainable transport, and capitalizing on the availability of previously developed land with the aim of protecting the natural environment? Many residents agreed with this in principle; for example, even though Save Royton’s Green Belt opposed development in the Green Belt, they viewed the pooling of land resources as a potential solution to minimizing environmental harm. It was on this basis that the two cities and some of the boroughs absorbed housing need from areas that did not have enough land supply.

However, such an approach comes with certain implications. The main one being that it gives the residents of one district an interest in what happens in another. A change of situation in policy or resources in one has possible consequences for all the others. There have been two significant changes since the 2019 consultation for the GMSF: Stockport has left the arrangement, and there has also been a revision to the Local Housing Need methodology resulting in a 35 percent uplift being applied to the target for the City of Manchester. Stockport’s departure is unlikely to have a negative impact on the nine remaining districts as it was a beneficiary of land resources.

As a consequence of applying the uplift, the City of Manchester is no longer in a position to absorb housing need from the other boroughs. This undermines the arrangement upon which the plan was consulted on. Approximately 20,000 homes have been allocated in the Green Belt and on OPOL across six boroughs; likewise the 35 percent uplift has resulted in almost 15,000 extra homes being added to the target for the City of Manchester—land supply that could have otherwise been utilized to offset Green Belt loss in the boroughs.

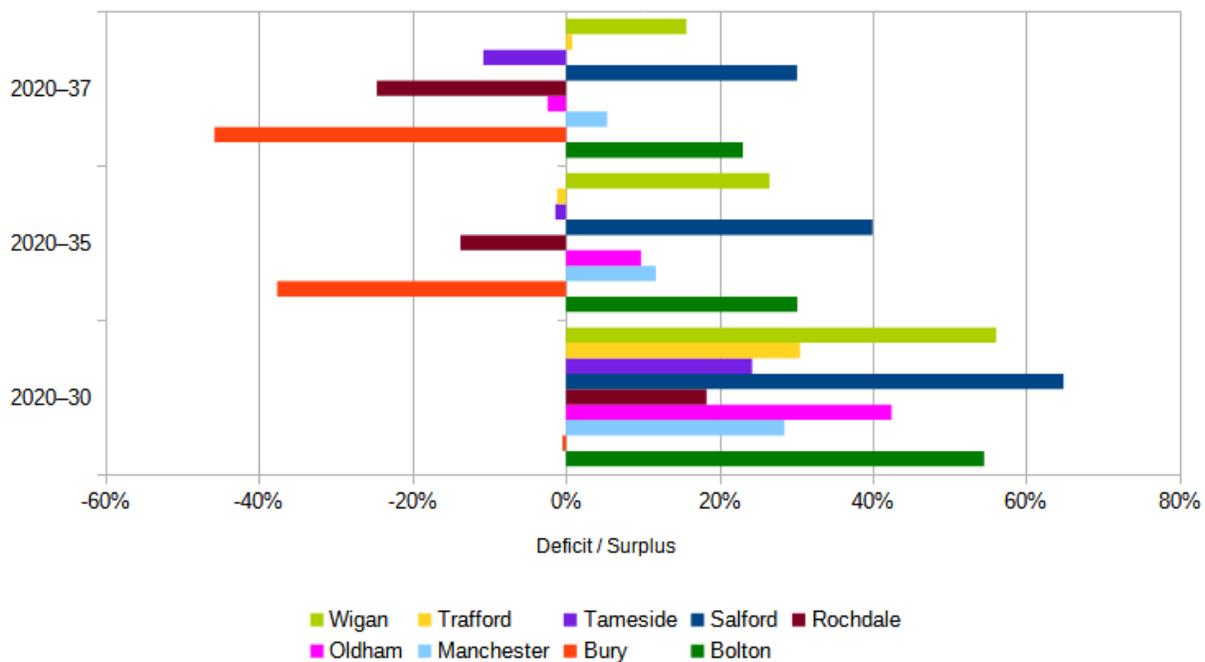
This is not a zero-sum effect: the incentive that existed for some boroughs to join a city-region masterplan is no longer there. Without that incentive many residents may prefer the greater autonomy of a Local Plan. Also, given the symbiotic relationship between the districts the uplift precipitates development in the Green Belt elsewhere in Greater Manchester. This effectively positions the uplift as an exceptional circumstance for changes to the Green Belt, but this has not been advanced as such and subjected to a Regulation 18 consultation.

Housing land deficit

Each planning authority maintains a Strategic Housing Land Availability Assessment (SHLAA) which logs each developable housing site in the district area along with the estimated number of dwellings the site can support. The SHLAA is divided into 5-year increments over a 15-year period to provide an indicative timescale for delivery. A land surplus or deficit can be identified by comparing the housing delivery trajectory in the SHLAA to the annual target for the area. PfE concedes the existing land supply is sufficient to meet the overall numerical need but contends that the allocations are necessary to ensure there is sufficient flexibility in the supply to ensure it is deliverable, viable and robust, thereby achieving the overall spatial strategy.

A comparison of the targets and the existing land supply trajectories in the plan area demonstrates that the case for Green Belt release is not properly evidenced or justified. Four of the districts (City of Manchester, Salford, Bolton and Wigan) all have sufficient existing supplies for the duration of the plan, while the remaining five districts (Bury, Oldham, Rochdale, Tameside and Trafford) all have sufficient land supplies up to 2030 at the earliest.

Fig. Supply to target ratio for the different phases of the plan



A land shortfall that is projected to be at least ten years down the line is not urgent enough to amount to the exceptional circumstances required to alter Green Belt boundaries, as established by judicial judgements on the issue. The quantum of land shortfall in itself does not automatically constitute an exceptional circumstance for altering the Green Belt boundaries, but rather the scale and urgency of the shortfall must be sufficiently acute to be considered as such.

Housing land resources

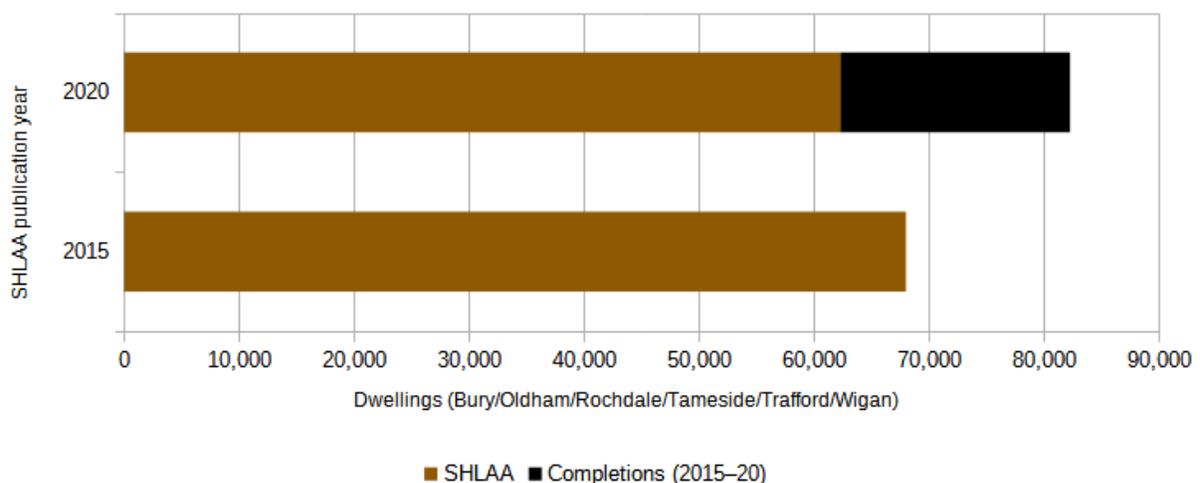
Windfall

A fundamental problem of PfE (and the GMSF before it) is that it does not recognise that the SHLAA is not a finite supply of land, but rather a “living” document, updated in perpetuity, operating much like a queue: as land drops off once it is built on, other land is added.

To this end it is useful to compare the overall quantum of projected dwellings between 2015 and 2037, based on the 2015 and 2020 SHLAAs. The figure below leaves out the City of Manchester and Salford because land comes forward on a different scale compared to the boroughs. Bolton was also omitted due to not having any housing allocations in the Green Belt, so that the comparison focuses on the districts where supply is under the most pressure.

Despite almost 20,000 additional dwellings between 2015 and 2020 across Bury, Oldham, Rochdale, Tameside, Trafford and Wigan, their combined land supply was depleted by less than 6,000 units. As a result, the overall projected supply between 2015 and 2037 has increased from 68,000 units to over 82,000 ([Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2019-20](#), Ministry of Housing, Communities and Local Government, November 2020).

Fig. Projected number of additional dwellings in PfE boroughs 2015–37



Sites that come forward that are not specifically identified by a development plan are defined as “windfall” by the NPPF. PfE acknowledges that large and medium windfall sites will come forward during the implementation of the plan but makes no provision for them. Not taking large windfall into account was one of the factors considered in [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#), and failure to take them into account was one of three grounds that resulted in the judgement remitting the land back to the Green Belt.

Higher densities

In addition to sourcing more land, existing supply can be used more efficiently. The NPPF (para. 141) instructs that before concluding that exceptional circumstances exist to justify altering the Green Belt boundaries, the plan should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. To this end examination of the strategic policies will include “whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”.

Policy JP-H 4 proposes minimum density formations in city centres, town centres and in other designated centres, and within 800 metres of railway stations, tram stops and Bus Rapid Transport stops. Ambiguous and outdated brownfield registers make it difficult to determine whether a site satisfies the criteria of the minimum density specification and if the prescribed minimum density will be delivered. It is not clear from the specification which towns qualify as town centres, large designated centres, and other designated centres. The town boundaries are difficult to discern too, so without further clarity and explicit identification of which sites qualify for the higher densities it is next to impossible to accurately assess the deliverability of this aspect of the specification.

In attempt to understand the effectiveness of the policy, the Bamford Greenbelt Action Group and the Save Apethorn & Bowlacre Greenbelt groups joined forces with Save Royton’s Greenbelt to survey the densities of sites that meet the criteria in Rochdale, Tameside and Oldham. Focusing on just Brownfield sites (which is where you would most expect higher density developments to be found) in close proximity to railway stations and Metrolink stops we found the projected delivery of the minimum density specification to be very patchy. We found that on average the minimum densities were probably being delivered in Oldham and Tameside town centres, but not outside of them. In Rochdale’s case there does not seem to be any attempt at all to deliver the prescribed densities, and analysis was further undermined by the fact Rochdale had not updated its Brownfield register.

Failure to fully implement the minimum density specification is not only a failure to comply with the NPPF, it also severely undermines the spatial strategy at the heart of the plan. Two of the key components of the spatial strategy that the minimum density specification directly supports are optimizing the baseline housing land supply and concentrating development near to town centres and/or sustainable public transport hubs. If the minimum density specification is not being delivered then the spatial strategy is not being delivered.

Besides minimum density standards the NPPF (para. 141) also mandates that, before concluding exceptional circumstances exist, the strategy “makes as much use as possible of suitable brownfield sites and underutilised land”. To this end each district maintains a Brownfield register but two of them—Bolton and Rochdale—are not up-to-date. In Rochdale’s case this is especially grievous in respect of its allocations in the Green Belt and its failure to implement the minimum density specification. But even in those cases where the Brownfield registers are up-to-date a question of “completeness” hangs over them.

Oldham Council published documentation in July 2021 in conjunction with its Local Plan consultation. The [Oldham Local Plan Review: Issues and Options](#) paper announced that the council had commissioned a review of 76 unlisted mills to determine whether they should be protected or whether they have scope for conversion (paras. 20.17–20.24).

Save Royton’s Greenbelt have several concerns with Oldham’s mills strategy. Firstly, we believe that the question of local conservation in regards to mills that do not qualify for National Heritage listing cannot be taken in isolation, given the fact that the council has allocated development in the Green Belt. We believe that a significant portion of Oldham’s population would prefer to retain green space over unlisted mills if it comes down to that choice, and it is a bit late in the day to now put that question to the local population. This brings us to our second concern: the GMSF was first commissioned in 2014, and the mills survey should arguably have been carried out ahead of the first draft of the GMSF in 2016. While we accept that not all 76 mills would be suitable for conversion (a significant portion of them still serve an industrial purpose while others are in unsuitable locations) they would nevertheless offer a sizeable quantum of developable land.

The Chairman of Save Royton’s Greenbelt, Mr. Noel Mahon, Esq., pursued this matter and filed a Freedom of Information request to the council on 26th July 2021 through WhatDoTheyKnow (https://www.whatdotheyknow.com/request/oldhams_mills_strategy), and asked for the following information about the mills: i) the name and location of the mill; ii) the occupancy status of the mill (if known); iii) the proposed “landscape value” i.e. (high/medium/low); iv) the site area; v) whether the mill is included in the SHLAA. The request was denied on 20th August 2021 on the grounds of the Section 22 clause (the information is intended to be published a later date) and accompanied by the explanation “we believe that it is not in the public interest to disclose the information to you”.

It is noted that the refusal came during both the Local Plan consultation and PFE consultation. The information was extremely relevant to both and should have been disclosed to us in our view. If there was a legal reason why the council could not disclose all of the information to us the Freedom of Information Act places an obligation on a public authority to assist in re-phrasing the request to fulfil as much of the original request as it can legally disclose. By withholding this information from both the Brownfield register and PFE, Oldham Council has failed to demonstrate it has policies to “makes as much use as possible of suitable brownfield sites” and therefore has failed to comply with the NPPF (para. 141). The council has also not complied with its [Statement of Community Involvement](#) commitment to be transparent, which means they have contravened the [Planning and Compulsory Purchase Act 2004 \(para. 19\[3\]\)](#).

Site selection criteria

There were two spatial options available that could have facilitated the housing targets without any Green Belt release, and therefore the entire strategic justification for altering the Green Belt boundaries must be formulated within the context of the spatial strategy. To assist the allocation of sites in the Green Belt seven site selection criteria were formulated and applied to the process, to ensure that the allocated sites supported the strategic objectives of the chosen spatial strategy. These strategic objectives have been advanced as the exceptional circumstances justifying the alteration of Green Belt boundaries.

While the first six criteria all play into the strategic objectives of the plan, the seventh is divorced from the spatial strategy, and is designed to deliver benefits to the local community. These benefits include diverse housing mixes; including housing that is affordable and suitable for older people. The plan also proposes to offer exclusive high-end property under this criterion. While some of these aims are laudable, it is questionable that they constitute "exceptional circumstances" to take land out of the Green Belt in the case of sites that do not support any of the plan's strategic objectives. It should be possible to deliver all of these localized benefits through the existing baseline supply or through the allocations that support the strategic objectives of the spatial strategy.

Of the 18 allocations that satisfy Criterion 7, five do not satisfy any other Site Selection Criteria: JPA 9 (Walshaw); JPA 17 (Land South of Coal Pit Lane); JPA 19 (Bamford/Norden); JPA 27 (East of Boothstown); and JPA 32 (South of Hyde). Some of the arguments advanced under Criterion 7 make the case for good access to public transport. However, this seems to contradict the conclusions of the plan's own spatial measures, used to select potential sites for development. None of the sites allocated solely under Criterion 7 are located in the Site Criteria good accessibility area; if they had been, they would have been allocated under Criterion 1. This also raises another question: in the case of those sites that are deemed especially suitable as residential provision for older people, what is the basis for that conclusion? Elderly residents, many of whom will have mobility problems and may have forfeited access to private transport, will be one of the major beneficiaries of the spatial strategy.

We are being asked to take on faith that these local "benefits" qualify as exceptional circumstances. Some of these benefits seem counter-intuitive when taken in conjunction with the over-arching strategic aims of the plan, while others seem contradictory or completely superfluous. No evidence is presented for the local "need"; neither does the plan go into any great detail how the allocation will mitigate that need, or indeed offer any explanation as to why these needs cannot be addressed within the context of the spatial strategy. Criterion 7 sits apart from the spatial strategy, as a coat rack for sites that various parties wish to remove from the Green Belt for whatever reason but which do not fit with the underlying logic of the plan.

Buffers

Places for Everyone (PfE) has identified its employment land supply requirements as 1,453,000 sqm of office floor space and 2,534,000 sqm of industrial and warehousing floor space across the plan area between 2021 and 2037, based on past completions. Policy JP-J 3 sets a target of 1,900,000 sqm of office floor space over the course of the plan, while Policy JP-J 4 sets a target of 3,330,000 sqm of industrial and warehousing floor space; both targets include a 5-year (31 percent) margin to provide flexibility of supply. There is currently a surplus of office space but a shortfall of 728,000 sqm in industrial and warehousing floor space. To this end PfE has allocated 2,633,000 sqm of floor space in the Green Belt for industrial and warehousing purposes. It is illuminating to compare the provision of floor space to the identified need:

Table. PfE industrial & warehousing floor space (square metres)

	Floor space	Surplus (%)
Gross need	2,534,000	0%
Policy JP-J 4 target	3,330,000	31%
Plan period (2021–2037)	3,960,389	56%
Total floor space (2021–)	4,438,182	75%

An assessment of employment land by Nicol Economics for the GMSF concluded that a margin of up to 25 percent on the land supply was justifiable, but a “supply margin of 50% falls well outside the bounds of what has been generally used elsewhere”. PfE adopts a 31 percent margin in its two employment land supply policies, but in reality the margin on the industrial and warehousing land supply is effectively 56 percent over the plan period, and 75 percent in total. It does not evidence or justify its policy margin, the surplus of land over the plan period, and the allocation of land beyond the lifespan of the plan.

There is a crucial difference between the GMSF and PfE: the GMSF used economic forecasting to identify floor space requirements, but PfE has switched to a “past completions” model. This has resulted in the industrial land target for the duration of the plan dropping from 4,100,000 sqm in the 2020 draft to 3,330,000 sqm. However, it would appear the GMSF allocations have been carried forward by PfE but the overall quantum of floor space provision has not been reduced accordingly.

Legal precedent has established that failing to consider a reduced land requirement is a material consideration when concluding if exceptional circumstances have been met for altering Green Belt boundaries. In [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#) the judgement found that the exceptional circumstances justifying Green Belt release had not been adequately explained or consulted on in light of the drop in requirement. The judgement concluded that the plan must take the up-to-date position in respect of all material considerations that contribute to the exceptional circumstances for Green Belt release.

One of the core objectives of PfE is to boost competitiveness in the North of the conurbation. To this end the plan hosts two strategic policies: the Wigan-Bolton Growth Corridor and the North-East Growth Corridor along the M62, spanning Bury, Oldham and Rochdale. In conjunction with these strategic policies, the plan also allocates several sites in the Green Belt for industrial and warehousing purposes, with the stated aim of maintaining a diverse supply of employment sites and delivering economic growth in the North.

The area will comprise the Northern Gateway (JPA 1.1 & 1.2), Stakehill (JPA 2), the High Crompton Broad Location (allocated as Kingsway South in the GMSF) and several other sites in the baseline supply amounting to almost 2,000,000 sqm of floor space, and delivering over 1,100,000 sqm throughout the duration of the plan (*Policy JP-Strat 7* paper, Save Royton's Greenbelt, September 2021). If all the floor space is ultimately delivered, one relatively small geographic area will account for approximately 10 percent of all the industrial and warehousing land in Greater Manchester.

The concentration of industrial and warehousing in this area gives rise to several concerns. Firstly, PfE's own data shows that the Gross Value Added (GVA) change for manufacturing has undergone an annual decline in Greater Manchester, while GVA growth for transportation and storage has lagged the rest of the economy (7 percent between 2004 and 2018 compared to 20 percent for the total Greater Manchester economy). If these rates of growth were to continue they would result in the wealth gap widening between the North and South of the conurbation.

Secondly, PfE's own data also shows a negative demand for B1 and B2 floor space (industrial processes and general industrial), and that the demand is mainly for B8 floor space (storage and distribution). Warehousing employment densities compare unfavourably to other occupations, and is a sub-optimal use of employment space, with a large portion of floor space given over to the storage of goods rather than employment. Such a huge concentration of warehousing in such a confined area will lead to low levels of job creation (compared to employment zones of similar size in other parts of Greater Manchester), and slow wealth creation. These problems will also be exacerbated due to the rise of automation. PfE assumes a static Gross External Area (GEA) employment density for warehousing (77 sqm per FTE job), but it is not difficult to envisage this density increasing over the next couple of decades.

Our third concern is that the North-East Corridor could lead to an over-supply of fulfilment warehousing, where Bury, Oldham and Rochdale end up competing for the same business. This would actually reduce the competitive effectiveness of the Northern Gateway and Stakehill resulting in a "race to the bottom" and putting downward pressure on wages. It seems that this is being dictated not by actual need in the North of Greater Manchester but by the desire to outsource the demographic/geographic problems of the boroughs in the South of Greater Manchester.

Reasonable alternatives

The GMSF, forerunner to PfE, was commissioned in 2014, and some of the evidence base that formed the first draft came from 2012. Since the inception of a masterplan for homes and jobs in Greater Manchester, climate change has escalated to crisis levels. Since the Regulation 18 consultation in 2019, all nine district members of PfE have declared climate emergencies and are required to bring forward and implement a Climate Action Plan. It is imperative that the climate objectives for Greater Manchester must take a greater priority now than they did back in 2014, or even 2019 when the last consultation occurred.

Policy JP-S 1 states that “to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously”. In reality the environment seems to have been a secondary consideration throughout all permutations of the plan. The Growth and Spatial Options prioritised economic and population growth and the environmental consequences were always something that needed to be “mitigated”. All the compromises have come at the expense of the environment.

The lack of consideration given to climate change can be found in the Integrated Assessment for the Growth and Spatial Options. In considering Objective 15 the 2019 Spatial Option, Urban Max and Public Transport Max are all marked positively for promoting a proactive reduction in direct and indirect greenhouse emissions. However the Integrated Assessment does not discriminate between the relative performances of the different Spatial Options on this front. This is a highly compromising weakness when compared to steps that other Local Plans are taking.

For example the Cambridge Local Plan, that is currently being prepared, modelled the projected carbon emissions for each of their spatial options ([Greater Cambridge Local Plan - Strategic spatial options appraisal: implications for carbon emissions](#); Bioregional, on behalf of Greater Cambridge Shared Planning Authority, November 2020; pp. 21–22). The model found that densification and public transport corridors (equivalent to PfE’s Urban Max and Public Transport Max) had vastly superior performances to fringe Green Belt sites. Here, densification outperforms fringe Green Belt by an almost 30 percent projected reduction in carbon emissions, but this nuance of analysis is absent from PfE. The thinking behind PfE will be almost ten years old once the plan commences, and compared to the Cambridge approach it is already showing its age.

A recent report by Shelley Phelps for the BBC ([Council policies 'inconsistent' with climate goals](#), BBC, 13 August 2021) found that a third of councils had policies incompatible with their climate goals. In this context it is difficult to argue against subjecting the spatial options to a more rigorous assessment that discriminates more on climate related issues and addresses the core objectives of each council’s climate action plan.

Challenges to soundness

This section collates all of the challenges along with the requested modifications. Even though all the key points are summarised here, the Executive Summary will provide a complete picture of the background arguments. Evidence is provided in the accompanying topic papers. Some of the proposed modifications are contradictory, but this is a consequence of different arguments having different logical outcomes.

Ground one

The following policy is not legally compliant:

- Policy JP-H 1 (Scale, Distribution and Phasing of New Housing Development)

The following policy is not sound on the grounds it is not consistent with NPPF para. 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- Policy JP-G 10 (The Green Belt)

Reason

As a consequence of the revision to the Local Housing Need methodology resulting in a 35 percent uplift being applied to the target for the City of Manchester, the city is no longer in a position to absorb housing need from the outer boroughs. This fundamentally changes the arrangement upon which the plan was consulted on. Approximately 20,000 homes have been allocated in the Green Belt and on OPOL across six boroughs; likewise the 35 percent uplift has resulted in almost 15,000 extra homes being added to the target for the City of Manchester—land supply that could have otherwise been utilized to offset Green Belt loss in the boroughs.

The main incentive that existed for some boroughs to join a city-region masterplan no longer exists, and without it residents may prefer the greater autonomy of a Local Plan. The plan has chosen to address housing provision on a city-region basis rather than a district basis, so it follows that land supplies must be approached in the same way. Taking this design feature to its logical conclusion, housing need in one part of Greater Manchester can lead to Green Belt allocations in another.

This effectively positions the uplift as an exceptional circumstance for changes to the Green Belt. Without presenting the 35 percent uplift as an evidenced exceptional circumstance and subjecting it to a Regulation 18 consultation, it is difficult to see how progressing to a Regulation 19 consultation is legal.

Modification

The City of Manchester uplift should be used to absorb housing need from the boroughs as proposed in the Greater Manchester Spatial Framework, rather than accommodating an arbitrary target imposed by the Local Housing Need methodology.

Ground two

The following policy is not sound on the grounds it is not effective:

- Policy JP-S 1 (Sustainable Development)

The following policy is not sound on the grounds it is not consistent with NPPF para. 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- Policy JP-G 10 (The Green Belt)

Reason

The release of land from the Green Belt at the outset of the plan has not been fully evidenced or properly justified. All districts will have a 5-year supply upon adoption without dependence on allocations, and all have sufficient supply to service their housing targets until 2030 at the earliest. All districts with the exception of Bury will maintain a buffer of at least 17 percent during this period, over the threshold of 15 percent established by PfE to maintain flexibility. The City of Manchester, Salford, Bolton and Wigan all have sufficient supply for the duration of the plan. Oldham will lose its buffer in the final two years (2035–2037) but this period lies beyond the reliable scope of the SHLAA, so is not sufficiently evidenced.

Recent historical trends suggest that large amounts of windfall will come forward, and PfE documentation acknowledges this, but it is not taken into account. Releasing land from the Green Belt at the outset of the plan when the evidenced deficit is at least ten years away is inconsistent with the Brownfield preference component of Policy JP-S 1.

Recent legal precedent has established that the “exceptional circumstances” required to alter the Green Belt boundaries are not established by housing need alone, but rather by the extenuating circumstances of the housing need, such as the scale and urgency of the need. Legal precedent has also recently established that large windfall should not be ignored, and is a material consideration bearing on the decision to release Green Belt land for housing. *See Save Royton’s Greenbelt “Windfall” paper for evidence.*

Modification

All housing allocations in Salford, Wigan and Oldham should be fully withdrawn. In the absence of a windfall allowance, the rest could be converted into Broad Locations for Growth similar to the High Crompton Broad Location, subject to review over the course of the plan.

There should be no alterations to the Green Belt boundary at the outset of the plan. The decision to release Green Belt land should be delayed until the first 5-year review period at the earliest, at which point more windfall will have come forward and the SHLAAs will fully encompass the remaining lifespan of the plan by this point, providing a more accurate picture of the land supply position.

Ground three

Policy JP-H 4 (Density of New Housing) is not sound on the following grounds:

- It is not effective
- It is not consistent with NPPF para. 141 (Before concluding that exceptional circumstances exist...)

Reason

Ambiguous definitions in Policy JP-H 4 and outdated brownfield registers make it difficult to determine whether a site satisfies the criteria of the minimum density specification and if the prescribed minimum density will be delivered. The minimum density specification plays a vital role in the spatial strategy by delivering housing in a manner that fully exploits proximity to economic assets and sustainable transport infrastructure. Assessment of a sample of sites, that in our judgement satisfy the criteria, suggests that the minimum density specification is not being delivered in Oldham, Rochdale and Tameside, especially outside of the main town centres. If this is the case, then Policy JP-H 4 is not deliverable. If the plan is not able to demonstrate the deliverability of Policy JP-H 4 then this also means it is not compliant with NPPF para. 141. *See Save Royton's Greenbelt "Policy JP-H 4" paper for evidence.*

Modification

The following amendments need to be made:

- Policy JP-H 4 should provide precise definitions for city centres, town centres, large designated centres and other designated centres. All the centres that these definitions apply to should be clearly identified i.e. all town centres should be listed, all designated centres and so forth.
- In addition to identifying the proposed density at the site, the SHLAAs should also clearly indicate if the site meets the criteria for the minimum density specification and state the prescribed minimum density, regardless of whether it will deliver the density.
- The plan should clearly state the average density projected in the SHLAAs for each density categorization in the specification, for each of the nine districts.
- The plan should clearly state how many of the sites are projected by the SHLAAs to deliver the prescribed density, and how many will not, for each density categorization in the specification, for each of the nine districts.
- All brownfield registers should be brought up to date.

There will be instances where delivering the prescribed minimum is not viable; however, it is reasonable to expect that the majority of sites that meet the criteria for the minimum density specification deliver the prescribed densities, and collectively the plan should be on average delivering densities that exceed the prescribed minimum densities.

No Green Belt allocated for housing should be released until the plan demonstrates the deliverability of its minimum density specification.

Ground four

Preparation of the plan is not legally compliant with the [Planning and Compulsory Purchase Act 2004 \(para. 19\[3\]\)](#) on the following grounds:

- Oldham Council has not adhered to its [Statement of Community Involvement](#)

The following policy is not sound on the grounds it is not effective:

- Policy JP-S 1 (Sustainable Development)

The following policy is not sound on the grounds it is not consistent with NPPF para. 141 (Before concluding that exceptional circumstances exist...):

- Policy JP-G 10 (The Green Belt)

Reason

In July 2021 Oldham Council published the [Local Plan Review: Issues and Options](#) paper in conjunction with its Local Plan consultation, which elaborated on its review of 76 unlisted mills to determine if they should be protected or whether they have scope for conversion (paras. 20.17–20.24). This work should have preceded the allocation of sites in the Green Belt during preparation of the GMSF. The Council will not be in a position to fulfil NPPF para. 141 until this work is completed.

Save Royton's Greenbelt pursued this matter with a Freedom of Information request through WhatDoTheyKnow (https://www.whatdotheyknow.com/request/oldhams_mills_strategy) on 26th July 2021, and asked for the following information about the mills: i) the name and location of the mill; ii) the occupancy status of the mill (if known); iii) the proposed "landscape value" i.e. (high/medium/low); iv) the site area; v) whether the mill is included in the SHLAA. The request was denied on 20th August 2021 on the grounds of the Section 22 clause (the information is intended to be published a later date) and accompanied by the explanation "we believe that it is not in the public interest to disclose the information to you". The refusal came during both the Local Plan and PfE consultations, and was relevant to both. If there is a legal reason why the council cannot disclose all of the information to us the Freedom of Information Act places an obligation on a public authority to assist in re-phrasing the request to fulfil as much of the original request as it can legally disclose. By withholding this information the council has also failed to comply with its Statement of Community Involvement commitment to be transparent, which is legally binding for the preparation of local development documents.

Modification

The Council states the work will be completed and published towards the end of 2021. There should be no alterations to the Green Belt boundaries in Oldham until the residents of Oldham have an opportunity to review and consult on the conclusions of this work.

Ground five

The following policies are not sound on the grounds they are not consistent with NPPF para. 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- JPA 9 – Walshaw
- JPA 17 – Land South of Coal Pit Lane
- JPA 19 – Bamford/Norden
- JPA 27 – East of Boothstown
- JPA 32 – South of Hyde

Reason

The cases for exceptional circumstances advanced under Site Selection Criterion 7 mostly lack merit, and in some instances are counter-intuitive and even contradictory:

- Provision of housing that is diverse, affordable and suitable for older people – Such housing could just as easily be provided via sites that support the strategic objectives of the plan or are listed in the SHLAA.
- Provision of exclusive high-end property – Such an argument has no laudable social or economic objective to recommend it and comes into conflict with the core principles at the heart of Green Belt policy.
- Provision of housing with good access to public transport – This directly contradicts the Site Selection Criteria for the plan. Any site that is within the Site Selection good accessibility area is allocated under Criterion 1, and these sites are not.

The first six Site Selection Criteria support the strategic objectives of the plan, and the strategic objectives are advanced as exceptional circumstances. However, Criterion 7 does not support the strategic objectives so what makes it an exceptional circumstance? We are being asked to simply accept the premise that a local benefit is automatically an exceptional circumstance but no evidence or justification is presented to that effect. *See Save Royton's Greenbelt "Criterion 7" paper for further background.*

Modification

Criterion 7 from the Site Selection Criteria should be deleted. Consequently, the following sites that were allocated under Criterion 7 will need to be deleted:

- JPA 9 – Walshaw
- JPA 17 – Land South of Coal Pit Lane
- JPA 19 – Bamford/Norden
- JPA 27 – East of Boothstown
- JPA 32 – South of Hyde

Ground six

The following policies are not sound on the grounds that when considered in conjunction they are not consistent with NPPF para. 140 (Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- Policy JP-J 4 (Industry and Warehousing Development)
- Policy JP-G 10 (The Green Belt)

Reason

PfE does not evidence and justify the following:

- Selection of a 5-year (31 percent) margin over a 4-year (25 percent) margin on industrial and warehousing land supply.
- A 660,389 sqm surplus (over the 5-year margin) of industrial and warehousing land over the plan period.
- The allocation of 478,000 sqm of industrial and warehousing land post-2037.

The sites named in the industrial allocation policies were allocated in the GMSF, in accordance with the target set by Policy GM-P 4 to deliver 4,100,000 sqm of industrial and warehousing floor space. The allocations were carried forward by PfE but have not been aligned with the reduced floor space requirement.

This fails to take into account the legal precedent established by [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#). The judgement found that the exceptional circumstances justifying Green Belt release had not been adequately explained or consulted on in light of the drop in requirement. The judgement concluded that the plan must take the up to date position in respect of all material considerations that contribute to the exceptional circumstances for Green Belt release. *See Save Royton's Greenbelt "Policy JP-J 4" paper for evidence.*

Modification

The following modifications need to be made:

1. The margin on the employment land supply needs to be reduced to 4 years and the revised target needs to be adopted by Policy JP-J 3 and Policy JP-J 4.
2. The following industrial allocation policies need to be amended (either through deletion of sites or by scaling back the land mass of the allocations) so that the overall quantum of Green Belt release is brought in line with Policy JP-J 4:
 - JPA 1.1 (Heywood/Pilsworth); JPA 2 (Stakehill); JPA 4 (Bewshill Farm); JPA 5 (Chequerbent North); JPA 6 (West of Wingates); JPA 10 (Global Logistics); JPA 14 (Broadbent Moss); JPA 29 (Port Salford Extension); JPA 30 (Ashton Moss West); JPA 33 (New Carrington); JPA 34 (M6 Junction 25); JPA 36 (Pocket Nook); JPA 37 (West of Gibfield).

Ground seven

The following policies are not sound on the grounds that when considered in conjunction they are not positively prepared:

- Policy JP-Strat 6 (Northern Areas)
- Policy JP-Strat 7 (North-East Growth Corridor)
- Policy JP-J 1 (Supporting Long-Term Economic Growth) [G7 component]
- JPA 1.1 (Heywood/Pilsworth); JPA 1.2 (Simister and Bowley); JPA 2 (Stakehill); High Crompton Broad Location

Reason

Warehousing already comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in Greater Manchester. The North-East Growth Corridor would further exacerbate this imbalance. *Note on Employment Land needs in Greater Manchester* (February 2020) concludes that due to the decline of manufacturing the requirement for new industrial and warehousing floor space is largely driven by the demand for storage and distribution facilities.

However, compounded GVA growth for storage and distribution between 2004 and 2018 has seen slower growth than that of the overall economy in Greater Manchester (7 percent compared to 20 percent). This economic model will not deliver the "significant increase in economic growth" as promised by Policy JP-Strat 6, nor will it deliver a "better distribution of growth across Greater Manchester" in line with Policy JP-J 1 (G7). The GMCA's own data shows that a better distribution of economic growth would be delivered by diversifying industry, not by doubling down on more of the same. As it stands, PfE will oversee a widening of the wealth gap between the North and South of the conurbation. *See Save Royton's Greenbelt "Policy JP-Strat 7" paper for evidence.*

Modification

The following policy needs to be completely re-written to ensure that industry and employment in the North of the conurbation is diversified and delivers GVA growth in line with the rest of Greater Manchester.

- Policy JP-Strat 7 (North-East Growth Corridor)

The Northern Gateway should be turned into a reserved Broad Location for growth:

- JPA 1.1 (Heywood/Pilsworth); JPA 1.2 (Simister and Bowley)

The following allocation should be deleted:

- JPA 2 (Stakehill)

Ground eight

The following policies are not sound on the grounds that when considered in conjunction they are not positively prepared:

- Policy JP-Strat 6 (Northern Areas)
- Policy JP-Strat 7 (North-East Growth Corridor)
- Policy JP-J 2 (Employment Sites and Premises)
- JPA 1.1 (Heywood/Pilsworth); JPA 1.2 (Simister and Bowley); JPA 2 (Stakehill); High Crompton Broad Location

Reason

The North-East Growth Corridor may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway and Stakehill. It seems that this is being dictated not by actual need in the North of Greater Manchester but by the desire to outsource the demographic/geographic problems of the boroughs in the South of Greater Manchester. As such Oldham and especially Rochdale would be tying themselves to the economic needs of the southern boroughs.

The supply of such a large quantity of floor space (over 1 million sqm over the course of the plan and potentially 2 million sqm beyond the lifespan of the plan) in such a confined area is also a sub-optimal use of employment space. Storage and distribution facilities have a GEA employment density (sqm per FTE job) of almost double general industrial, and both compare unfavourably to the densities of office jobs. The low employment densities and low GVA of warehousing will lead to low levels of job creation (compared to employment zones of similar GEA) and low wealth creation (in comparison to the rest of the plan area).

Another issue is that storage and distribution is extremely susceptible to automation. In its employment land projections, PFE bases its projections on the assumption that the employment density of warehousing will not change, which is unlikely. The North-East Growth Corridor just bakes more unemployment into Oldham's and Rochdale's economic futures. *See Save Royton's Greenbelt "Policy JP-Strat 7" paper for evidence.*

Modification

Please refer to suggested modification for Ground seven.

Ground nine

The plan is not legally compliant with the [Environmental Assessment of Plans and Programmes Regulations 2004 \(para. 12\[2b\]\)](#) on the following grounds:

- It does not evaluate the likely significant effects on the environment with sufficient precision to discriminate between the reasonable alternatives.

The GMSF 2019 Spatial Option is not sound on the grounds it is not justified by the following policy:

- Policy JP-S 1 (Sustainable Development).

Reason

Policy JP-S 1 states that “to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously”. However, the emphasis of the plan has been firmly on homes and the economy through all iterations of PfE/GMSF. Since the Regulation 18 consultation in 2019, all nine district members of PfE have declared climate emergencies and are required to bring forward and implement a Climate Action Plan. It is imperative that the climate objectives for Greater Manchester must take a greater priority now than they did when the plan first originated in 2014, or even in 2019 when the last consultation occurred, taking into account that a recent report found that a third of councils had policies incompatible with their climate goals (Shelley Phelps, [Council policies 'inconsistent' with climate goals](#), BBC, 13 August 2021).

The Environmental Assessment of Plans and Programmes Regulations 2004 requires that plans evaluate the likely significant effects on the environment of the reasonable alternatives, but the Integrated Assessment does not provide enough information to make a meaningful comparison between environmental and climate objectives. Other emerging plans, such as the Cambridge Local Plan ([Greater Cambridge Local Plan - Strategic spatial options appraisal: implications for carbon emissions](#); Bioregional, on behalf of Greater Cambridge Shared Planning Authority, November 2020; pp. 21–22) have attempted to model the carbon emissions for the spatial options, and the findings show there is a wide spectrum of outcomes.

Greater Manchester aims to be carbon neutral by 2038 so this plan needs to take us there, but it is impossible to say if that is a realistic possibility for the selected spatial option on the basis of the planning document.

Modification

The plan needs to provide a more rigorous assessment that discriminates on climate related issues and address the core objectives of each council’s climate action plan. It should clearly indicate how well or poorly each spatial option is likely to perform against meeting the 2038 carbon neutral target.

References

All documents and sources external to PFE/GMSF documentation referred to throughout this document and its supporting papers are listed here. All references to the National Planning Policy Framework throughout this work refer to the 2021 edition.

MappingGM

- GMSF 2021 consultation map (Brownfield registers (2020), Metrolink stops and railway stations selected) – https://mappinggm.org.uk/pfe-consultation-2021/?lyrs=brownfield_2020_gm,tfgm_metrolink_stops,tfgm_rail_stations#os_maps_lig ht/11/53.5562/-2.0867 [note: 2019 Brownfield register was most recent available for Bolton and Rochdale at the time of the consultation]

Government

- *Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2019-20*, November 2020, Ministry of Housing, Communities and Local Government [<https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>]
- *Greater Cambridge Local Plan - Strategic spatial options appraisal: implications for carbon emissions*; Bioregional, on behalf of Greater Cambridge Shared Planning Authority, November 2020; pp. 21–22 [<https://www.greatercambridgeplanning.org/media/1389/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf>]
- OMBC Statement of Community Involvement (2020) – https://www.oldham.gov.uk/downloads/file/7046/2020_statement_of_community_involvement
- Oldham Local Plan Review: Issues and Options (July 2021) – https://oldham.objective.co.uk/portal/oc/planning/spi/local_plan_review/io2021/io2021?pointId=5664998

Legislation:

- Planning and Compulsory Purchase Act 2004 – <https://www.legislation.gov.uk/ukpga/2004/5/contents/made>
- Environmental Assessment of Plans and Programmes Regulations 2004 – <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

Judgements:

- *Calverton v. Nottingham*: [2015] EWHC 1078 (Admin) – <https://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>
- *Compton v. Guildford*: [2019] EWHC 3242 (Admin) – <https://www.bailii.org/ew/cases/EWHC/Admin/2019/3242.html>
- *Aireborough Neighbourhood Development Forum v. Leeds*: [2020] EWHC 1461 (Admin) – <https://www.bailii.org/ew/cases/EWHC/Admin/2020/1461.html>

Articles:

- Shelley Phelps, "Council policies 'inconsistent' with climate goals", BBC, 13 August 2021
[<https://www.bbc.co.uk/news/science-environment-58102578>]

Freedom of Information requests:

- Oldham's mills strategy (Oldham Council) –
https://www.whatdotheyknow.com/request/oldhams_mills_strategy

Windfall: Analysis of the housing land supply in the PfE area 2020–2037

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Introduction

Places for Everyone (PfE) proposes to release enough land from the Green Belt and Other Protected Open Land (OPOL) to build over 20,000 homes. The case put forward for this proposal is that there is insufficient land available to build the 165,000 homes that PfE is committed to delivering across the lifespan of the 16-year plan (2021–2037).

PfE concedes the existing land supply is sufficient to meet the overall numerical need but contends that the allocations are necessary to ensure there is sufficient flexibility in the supply to ensure it is deliverable, viable and robust, thereby achieving the overall spatial strategy.

A comparison of the targets and the existing land supply trajectories in the plan area demonstrates that the case for Green Belt release is not properly evidenced or justified. Four of the districts (City of Manchester, Salford, Bolton and Wigan) all have sufficient existing supplies for the duration of the plan, while the remaining five districts (Bury, Oldham, Rochdale, Tameside and Trafford) all have sufficient land supplies up to 2030 at the earliest.

Analysis of completions data for the boroughs also reveals that based on historical yield a sizeable quantum of “windfall” will come forward throughout the implementation period, but the plan does not properly account for this phenomenon.

Releasing Green Belt land at the outset of the plan when there is sufficient supply for at least ten years and historical trends indicating more will come forward is inconsistent with PfE’s Brownfield preference policy. Moreover, a land shortfall that is projected to be at least ten years down the line is arguably not urgent enough to amount to the exceptional circumstances required to alter Green Belt boundaries, as established by judicial judgements on the issue.

Strategic Housing Land Availability Assessment

Each planning authority maintains a Strategic Housing Land Availability Assessment (SHLAA) which logs each developable housing site in the district area along with the estimated number of dwellings the site can support. The SHLAA is divided into 5-year increments over a 15-year period to provide an indicative timescale for delivery. A land surplus or deficit can be identified by comparing the housing delivery trajectory in the SHLAA to the annual target for the area.

PfE uses the SHLAAs for each district area to identify land supply surplus and deficits across the plan area, over the timescale of the plan. To ensure delivery of sufficient housing in the plan area, PfE redistributes some of the housing need from districts with a land supply deficit to districts with a land supply surplus. Where a deficit still remains, PfE has in total allocated approximately 20,000 dwellings in the Green Belt and on OPOL (*Places for Everyone Joint Development Plan Document*, para. 7.13). The overall land supply of 190,752 dwellings also factors in a 16 percent buffer for the cumulative PfE housing target of 164,881 dwellings (*Places for Everyone Housing Topic Paper*, para. 6.30).

7.13 The table below summarises the sources of housing land supply up to 2037.

District	Strategic Housing Land Availability Assessment			Allowances ⁽⁷⁵⁾	Places for Everyone Allocations ⁽⁷⁶⁾	Total 2020-37	Estimated Completions 2020-21 ⁽⁷⁷⁾	Estimated Land Supply 2021-2037
	Brownfield land	Greenfield land	Mix brownfield land and greenfield land					
Bolton	10,686	2,469	0	2,021	0	15,176	-504	14,672
Bury	3,056	424	362	261	4,700	8,803	-187	8,616
Manchester	49,455	2,591	9,676	805	0	62,527	-2,951	59,576
Oldham	7,712	1,276	1,410	557	2,176	13,131	-330	12,801
Rochdale	5,518	2,836	426	-783	4,006	12,003	-569	11,434
Salford	30,634	2,137	1,473	1,959	1,500	37,703	-1,680	36,023
Tameside	5,017	755	575	576	1,558	8,481	-281	8,200
Trafford	12,293	2,568	824	777	4,827	21,289	-591	20,698
Wigan	10,769	6,403	68	756	1,600	19,596	-864	18,732
Places for Everyone	135,140	21,459	14,814	6,929	20,367	198,709	-7,957	190,752

Table 7.1 Sources of housing land supply 2020-2037

77 Estimated completions 2020-2021 have been deducted from the total supply based on the target for 2020-2021 as presented in the GMSF October 2020

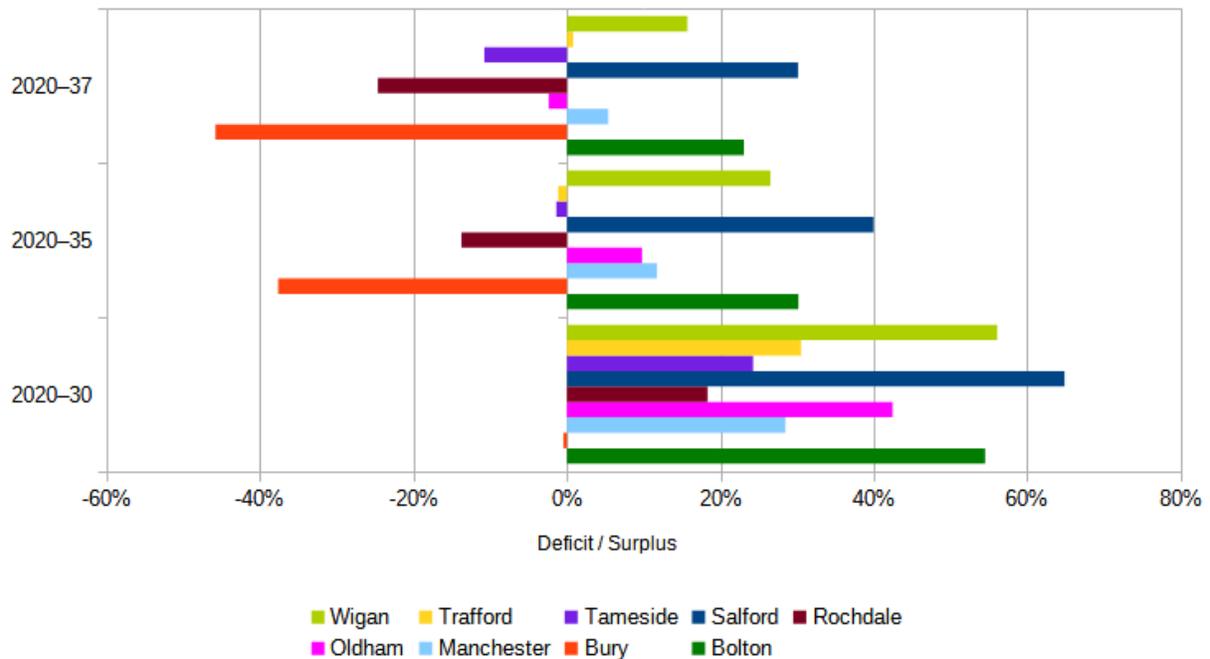
76 Excluding homes identified in existing land supply

75 Allowances are a combination of small sites windfall allowances and demolitions/clearances for four of the districts (Bolton, Manchester, Oldham and Rochdale). Rochdale has a negative allowance figure because the number of dwellings expected to be lost to demolition/clearances is expected to outnumber the number of new dwellings expected to be built on small sites.

Housing land supply surplus/deficit

It is illuminating to compare the cumulative surplus/deficit between the PfE's stepped targets and the projected number of developable dwellings in the SHLAA over three periods: 2021–2030, 2021–2035 and 2021–2037.

Fig. Supply to target ratio for the different phases of the plan



At the outset of the plan all nine districts will have a 5-year supply with a minimum 17 percent buffer, and all but Bury will retain their supplies and buffers over the 2021–2030 phase. Bury will have a 35 percent buffer at the outset but this is projected to erode away by 2030. The 2021–2035 phase will result in a deficit for Bury and Rochdale while Tameside and Trafford will lose their buffers, and in the final two years of the plan Oldham is projected to join them.

Table. Ratio of supply to target through different phases of the plan

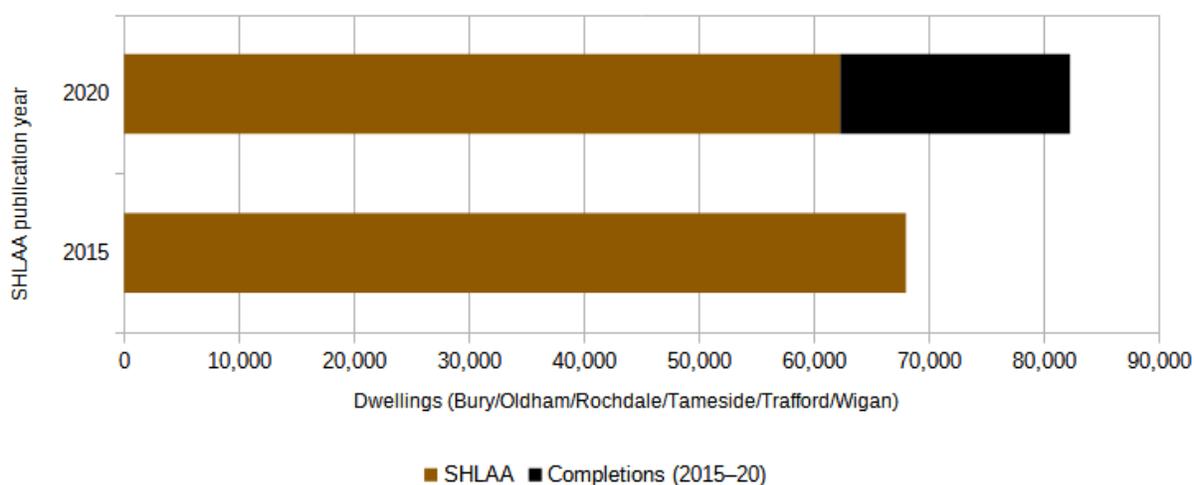
	2020–30	2020–35	2020–37
Bolton	55%	30%	23%
Bury	0%	-38%	-46%
Manchester	28%	12%	5%
Oldham	42%	10%	-2%
Rochdale	18%	-14%	-25%
Salford	65%	40%	30%
Tameside	24%	-1%	-11%
Trafford	31%	-1%	1%
Wigan	56%	27%	16%

The SHLAA is a living document

A fundamental problem of PfE (and the GMSF before it) is that it does not recognise that the SHLAA is not a finite supply of land, but rather a “living” document, updated in perpetuity, operating much like a queue: as land drops off once it is built on, other land is added.

To this end it is useful to compare the overall quantum of projected dwellings between 2015 and 2037, based on the 2015 and 2020 SHLAAs. The comparison below leaves out the City of Manchester and Salford because land comes forward on a different scale compared to the boroughs. Bolton was also omitted due to not having any housing allocations, so that the comparison focuses on the districts where the supply problems occur.

Fig. Projected number of additional dwellings in PfE boroughs 2015–37



Despite almost 20,000 additional dwellings between 2015 and 2020 across Bury, Oldham, Rochdale, Tameside, Trafford and Wigan, their combined land supply was depleted by less than 6,000 units. As a result, the overall projected supply between 2015 and 2037 has increased from 68,000 units to over 82,000.

Table. Projected number of additional dwellings in PfE boroughs 2015–37

SHLAA year	SHLAA	Completions (2015–20)
2015	67,999	0
2020	62,292	19,967

Source for the “Completions” data: [Table 122: housing supply; net additional dwellings, by local authority district, England 2001-02 to 2019-20](#), Ministry of Housing, Communities and Local Government, November 2020.

Sites which come forward that are not specifically identified by a development plan are defined as “windfall” by the National Planning Policy Framework (NPPF). PFE acknowledges that large and medium windfall sites will come forward during the implementation of the plan but makes no provision for them (*Places for Everyone Housing Topic Paper*, July 2021; Appendix A):

“No specific windfall allowance is currently proposed for such sites as part of the land supply due to the inherent difficulties in calculating what an appropriate allowance would be for all districts due to lack of consistent and comparable data on past trends, however there is clear evidence to demonstrate that such sites have come forward in the past and no reason to believe that this will not continue to be the case.”

At a meeting with the Greater Manchester Combined Authority on 30th September 2019, attended by Mr Noel Mahon and Mr Matthew Broadbent of Save Royton’s Greenbelt, accompanied by Mr Stuart Vendy of Cunnane Town Planning, with Ms Anne Morgan and Mr Crispian Logue representing the GMCA, it was put to the GMCA that it was remiss of the GMSF to not make any concession at all to the constant flow of windfall. Mr Logue responded that “broad locations for growth” were being used in place of a “windfall allowance”. His argument was that this is simply a categorisation issue: if a windfall allowance were introduced then these units would be accordingly subtracted from the broad locations for growth.

We accept Mr Logue’s point in part: you would expect a sizeable quantum of windfall to come forward within areas highlighted as broad locations for growth. However, this approach is hamstrung by the absence of a unifying and consistent underlying methodology; it seemingly does not account for windfall that will come forward in areas beyond these broad locations for growth, or indeed in districts that may not have identified any broad locations for growth.

Summary

By comparing the trajectories of the PfE housing targets and the district SHLAAs, it is evident that most of the deficit in the plan area occurs after 2030. Any deficit that occurs in the final two years of the plan (2035–2037) is not an evidenced shortfall, but rather an outstanding requirement that is a product of the mismatched life-cycles of the 16-year plan and the 15-year (2020–2035) SHLAA.

The allocations in Salford, Wigan and Oldham cannot be justified in terms of a shortage of land supply. Salford and Wigan both have enough land to service their housing targets for the duration of the plan. Oldham has enough land to service its target up to 2035; its buffer is wiped out in the final two years, but this is an un-evidenced deficit due to lying beyond the reliable scope of the SHLAA.

In the cases of Rochdale, Tameside and Trafford, Green Belt release cannot be justified when the SHLAA trajectory indicates that all three will have an intact 5-year supply upon commencement of the plan and any potential shortfall is at least ten years away, and recent historical trends indicate that substantial quantities of land will keep coming forward.

Sir Duncan Ouseley in [Compton v. Guildford \[2019\] EWHC 3242 \(Admin\)](#) noted that provision for “unmet need” is “simply not necessarily sufficient of itself” for releasing land from the Green Belt. Mr Justice Jay in [Calverton v. Nottingham et al. \[2015\] EWHC 1078 \(Admin\)](#) also concluded that the “acuteness/intensity of the objectively assessed need” is also a factor in considering whether exceptional circumstances may exist because “matters of degree may be important”. The takeaway from these two judgments is that the quantum of land shortfall in itself does not automatically constitute an exceptional circumstance for altering the Green Belt boundaries, but rather the scale and urgency of the shortfall must be sufficiently acute to be considered as such.

In addition, not taking large windfall into account was one of the factors considered in [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#). Mrs Justice Lieven commented that “It is not clear to me why large windfalls should be ignored in any event, given that they do provide a significant level of housing.” This was one of three grounds that resulted in the judgement remitting the land back to the Green Belt.

If the GMCA and councils are reluctant to incorporate a windfall allowance, then an alternative solution would be to delay any Green Belt release until the first 5-year review period and re-evaluate the land supply position (this is the approach being taken to the High Crompton Broad Location). At this point the SHLAAs would fully encompass the remainder of the plan; the release of Green Belt could be re-considered taking account of where windfall has come forward. The collapse of Bury’s buffer between 2025 and 2030 could be mitigated by slightly restructuring its target.

Soundness

The following policy is not sound on the grounds it is not effective:

- Policy JP-S 1 (Sustainable Development)

The following policy is not sound on the grounds it is not consistent with NPPF para. 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- Policy JP-G 10 (The Green Belt)

Reason

The release of land from the Green Belt at the outset of the plan has not been fully evidenced or properly justified. All districts will have a 5-year supply upon adoption without dependence on allocations, and all have sufficient supply to service their housing targets until 2030 at the earliest. All districts with the exception of Bury will maintain a buffer of at least 17 percent during this period, over the threshold of 15 percent established by PfE to maintain flexibility.

The City of Manchester, Salford, Bolton and Wigan all have sufficient supply for the duration of the plan. Oldham will lose its buffer in the final two years (2035–2037) but this period lies beyond the reliable scope of the SHLAA, so is not sufficiently evidenced.

Recent historical trends suggest that large amounts out of windfall will come forward, and PfE documentation acknowledges this, but it is not taken into account. Releasing land from the Green Belt at the outset of the plan when the evidenced deficit is at least ten years away is inconsistent with the Brownfield preference component of Policy JP-S 1.

Recent legal precedent has established that the “exceptional circumstances” required to alter the Green Belt boundaries are not established by housing need alone, but rather by the extenuating circumstances of the housing need, such as the scale and urgency of the need. Legal precedent has also recently established that large windfall should not just be ignored, and is a material consideration bearing on the decision to release Green Belt land for housing.

Modification

All housing allocations in Salford, Wigan and Oldham should be fully withdrawn. In the absence of a windfall allowance, the rest could be converted into Broad Locations for Growth similar to the High Crompton Broad Location, subject to review over the course of the plan.

There should be no alterations to the Green Belt boundary at the outset of the plan. The decision to release Green Belt land should be delayed until the first 5-year review period at the earliest, at which point more windfall will have come forward and the SHLAAs will fully encompass the remaining lifespan of the plan by this point, providing a more accurate picture of the land supply position.

Policy JP-H 4: Could Greater Manchester be more dense?

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Introduction

Places for Everyone (PfE) proposes to deliver approximately 165,000 dwellings across the plan area, between 2021 and 2037, including a minimum of 20,000 dwellings in the Green Belt. The chosen spatial option for the plan seeks to deliver inclusive growth across Greater Manchester. It will utilise an optimized baseline housing land supply in line with a minimum density specification that sets minimum densities for sites located within town and city centres, and in close proximity to public transport hubs.

The purpose of this report is to investigate how effectively the minimum density specification will be delivered as part of the implementation of the plan. This is not an entirely straightforward exercise because the specification appears to be presented mainly as an aspiration, rather than an integral part of the spatial strategy i.e. it only provides vague criteria for the sites rather than explicitly identifying the sites, which makes it very difficult to evaluate which sites specifically will utilise these higher densities and to what extent PfE will deliver them. Moreover, PfE seems to make no strategic provision for ensuring that councils adhere to the specification.

Without knowing for sure which sites will deliver these optimized densities we lack the necessary information to thoroughly review this aspect of the plan. However, by making use of the brownfield registers and the Greater Manchester Combined Authority's own mapping software we have attempted to construct an inventory of brownfield sites close to public transport hubs that satisfy the criteria for the higher densities.

Our findings indicate that the plan is not effective in fully delivering the minimum density specification. We also reach the conclusion that the plan is not compliant with the National Planning Policy Framework (NPPF), which directs that before establishing that exceptional circumstances exist to alter the Green Belt boundaries a plan must demonstrate that it makes as much use as possible of brownfield sites and promote a significant uplift in minimum density standards in town and city centres and locations well served by public transport.

Green Belt boundaries should only be altered if exceptional circumstances exist, and only if they are fully evidenced and justified. The NPPF (para. 141) also attaches several pre-conditions:

141. *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

(a) makes as much use as possible of suitable brownfield sites and underutilised land;

(b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

(c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

PfE sets about fulfilling these criteria in two principle ways.

All nine districts that comprise the plan area maintain brownfield registers. This is probably the simplest and most effective way for the plan to demonstrate it has complied with criterion #a.

To demonstrate compliance with criterion #b, PfE establishes a minimum density specification at strategic locations, such as designated town centres and within the vicinity of sustainable transport hubs. The density specification is set by Policy JP-H 4 and is reproduced on the next page.

Minimum density specification

Policy JP-H 4 (previously GM-H 4) proposes minimum density formations in city centres, town centres and in other designated centres, and within 800 metres of railway stations, tram stops and Bus Rapid Transport stops (*Places for Everyone Joint Development Plan Document*, p. 138 –139).

Policy GM-H 4			
Density of New Housing			
New housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport, in accordance with the minimum densities set out below.			
Location (use highest density that applies when a site falls within more than one location)	Minimum net residential density (dwellings per hectare)		
	Within the location	Within 400 metres	Within 800 metres
Designated centres:			
City Centre	200	120	70
Designated town centres	120	70	50
Other designated centres	70	50	35
Public transport stops:			
Main rail stations and Metrolink stops in the City Centre	N/A	200	120
Other rail stations and Metrolink stops in large designated centres	N/A	120	70
Other rail stations with a frequent service and all other Metrolink stops	N/A	70	50
Leigh Guided Busway stops	N/A	50	35
Areas within GMAL 6 and above or its equivalent	50	35	35

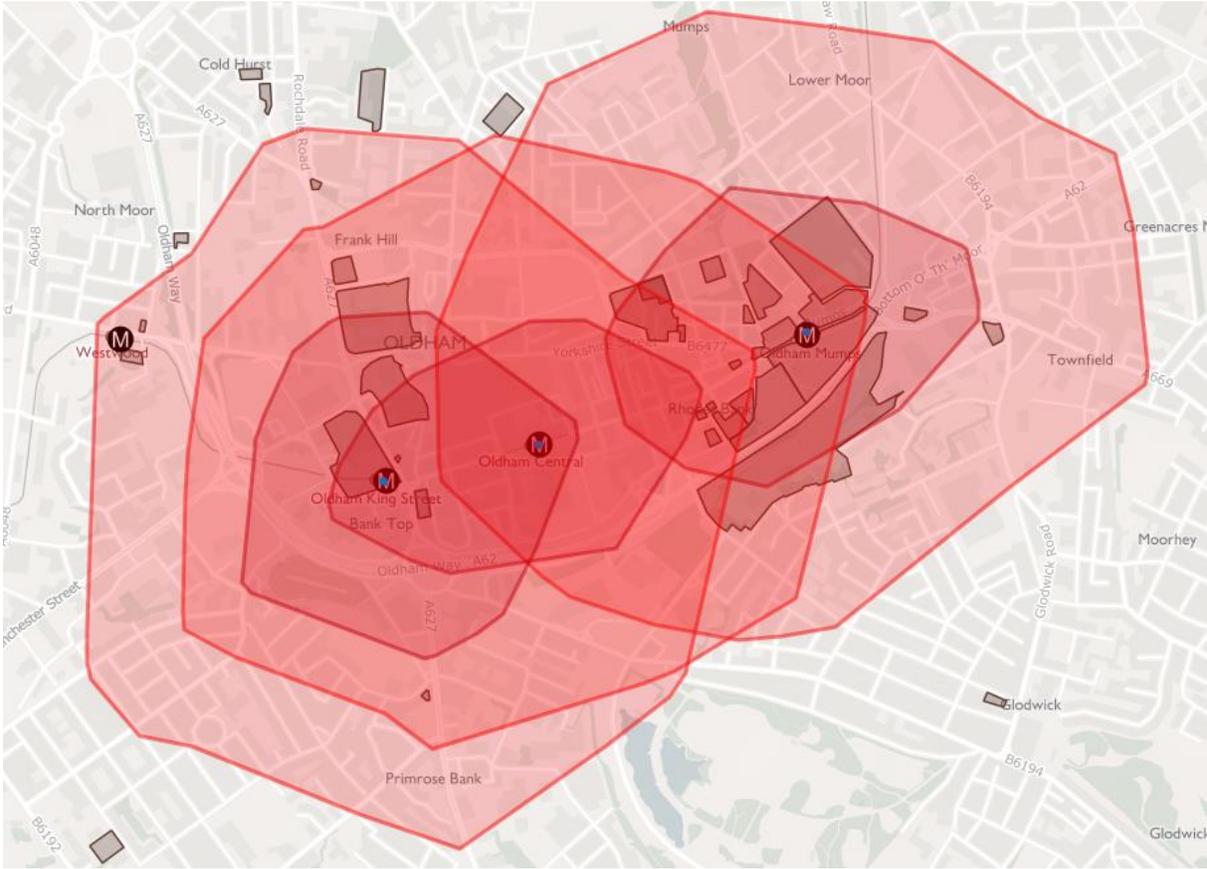
Assessing densities on brownfield close to public transport hubs

One of the key tests of soundness for the plan is effectiveness i.e. the plan should be deliverable over its duration. Therefore, it is necessary to ascertain to what extent the density specification will be delivered. The Strategic Housing Land Availability Assessment (SHLAA) does not indicate if it takes account of this specification, or indeed if it will be met. The failure to do so instigated this review of densities at sites that meet the specification criteria.

The exercise proceeded as follows: using the reachability tool and the brownfield registers available at [Mapping GM](#) (which also provides the site areas and the projected number of dwellings), brownfield sites close to transport hubs were selected and their densities were logged and evaluated. This was done by setting isochrones to 5 minutes (~400m) and 10 minutes (~800m) walking distance and centred on tram stops and railway stations (an example is shown on the next page). If any part of the site was touched by an isochrone it was added to the inventory. The 800m totals also include the 400m sites. Sites were assigned to the closest hub. Because of the vagueness of the criteria, a degree of personal judgement was employed, which opens up the possibility of human error.

Besides transport hubs, the specification also extends to town centres and “designated centres”, but neither these or their boundaries are clearly defined. To this end the study is confined solely to sites in close proximity to public transport hubs. Site selection is also limited to sites listed in the brownfield registers rather than the all-encompassing SHLAA. The reason for this is a pragmatic one: we had relatively little man-power and were working under time constraints. As brownfield seemed the more likely candidate for higher densities, it was the logical decision to make it the focus of the study. Three campaign groups took up the offer to participate in the study, with surveys undertaken in Oldham, Rochdale and Tameside.

The next few pages discuss the findings of this exercise, and a complete log of all the surveyed brownfield sites is provided in the Appendix.



The two tables below tabulate the projected average densities at brownfield sites we consider to be within 800m of a Metrolink stop or a railway station in the borough of Oldham, for the 2019 and 2020 brownfield registers. Since it is not clear which public transport hubs have been designated for higher densities, they were divided into two groups: those in Oldham town centre (interpreted here as a “large designated centre” in the terminology of the specification), and those that are not. An overview of Oldham’s Metrolink stops and railway stations is provided on the next page.

Table. Housing densities on brownfield near transport hubs in Oldham (2019)

Hectares	Dwellings	Density	Council	Location	Distance (m)	Type
18.45	1,961	106	Oldham	Town	800	Residential
24.42	2,239	92	Oldham	Town	800	Mixed
17.13	1,868	109	Oldham	Town	400	Residential
23.10	2,146	93	Oldham	Town	400	Mixed
27.09	1,456	54	Oldham	Other	800	Residential
28.65	1,466	51	Oldham	Other	800	Mixed
18.31	991	54	Oldham	Other	400	Residential
18.31	991	54	Oldham	Other	400	Mixed

Table. Housing densities on brownfield near transport hubs in Oldham (2020)

Hectares	Dwellings	Density	Council	Location	Distance (m)	Type
24.38	2,857	117	Oldham	Town	800	Residential
24.89	2,999	120	Oldham	Town	800	Mixed
23.06	2,764	120	Oldham	Town	400	Residential
23.57	2,906	123	Oldham	Town	400	Mixed
37.49	2,273	61	Oldham	Other	800	Residential
39.05	2,283	58	Oldham	Other	800	Mixed
24.76	1,470	59	Oldham	Other	400	Residential
24.76	1,470	59	Oldham	Other	400	Mixed

On average, the minimum density specification is not being fully delivered at hubs outside of the town centre (highlighted in red). There does not seem to be a concerted effort to deliver the 400m spec of 70 dwellings per hectare. At 59 dwellings per hectare it is slightly worse than the 800m spec of 61 dwellings per hectare.

As evidenced by the tables there was some upscaling of densities between the 2019 and 2020 editions of the brownfield register. Oldham Council reduced the footprint of its allocations in the Green Belt in PFE, so it is possible this upscaling has contributed to that decision.

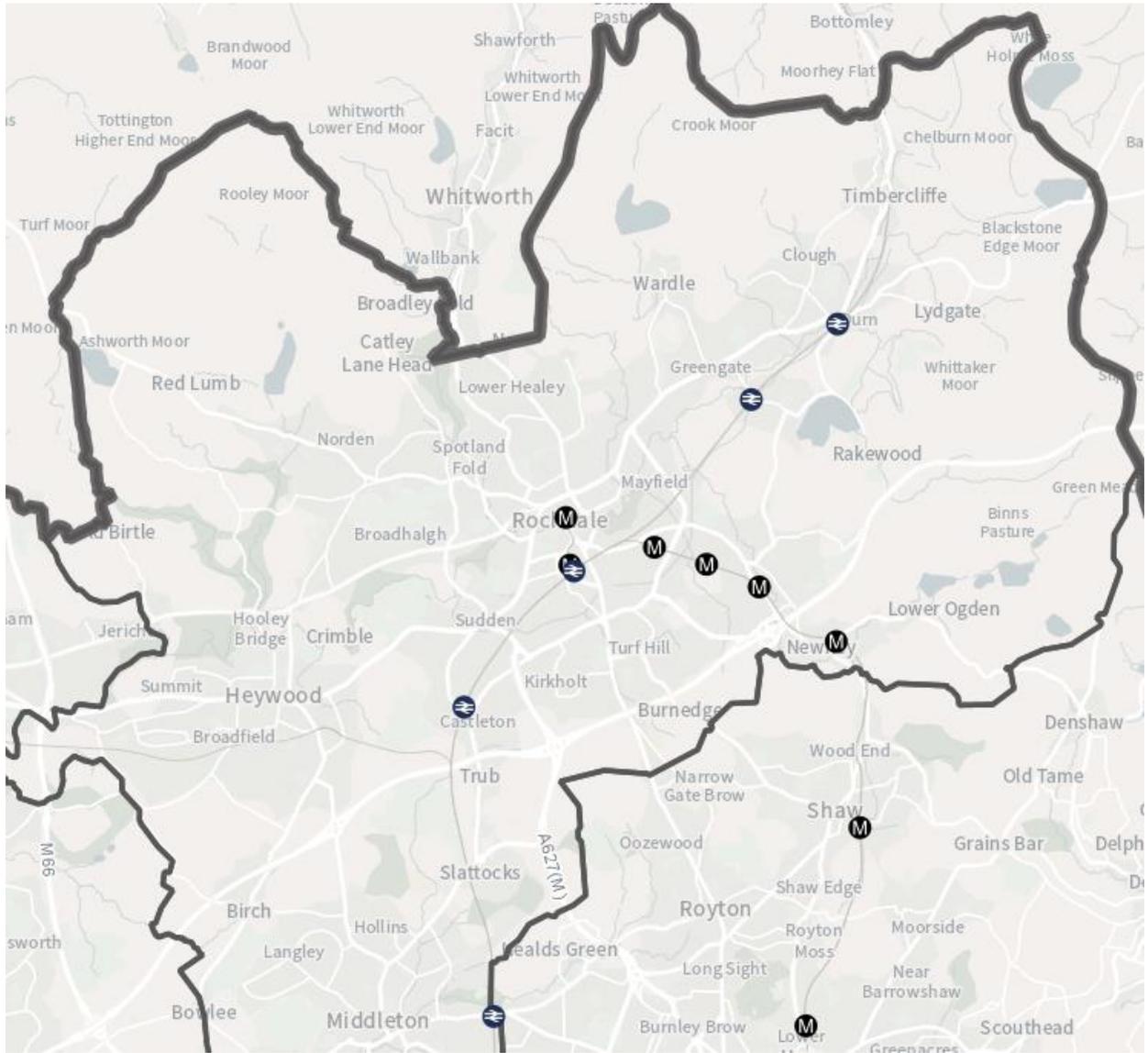
The table below tabulates the projected average densities at brownfield sites we consider to be within 800m of a Metrolink stop or a railway station in the borough of Rochdale, for the 2019 brownfield register. This is the most recent edition of the brownfield register publicly available for Rochdale. As with Oldham, the public transport hubs have been split between those in the town centre and those outside of it. An overview of Rochdale’s Metrolink stops and railway stations is provided on the next page.

Table. Housing densities on brownfield near transport hubs in Rochdale (2019)

Hectares	Dwellings	Density	Council	Location	Distance (m)	Type
22.61	1,147	51	Rochdale	Town	800	Residential
22.65	1,153	51	Rochdale	Town	800	Mixed
5.09	386	76	Rochdale	Town	400	Residential
5.09	386	76	Rochdale	Town	400	Mixed
17.17	770	45	Rochdale	Other	800	Residential
24.67	944	38	Rochdale	Other	800	Mixed
6.45	349	54	Rochdale	Other	400	Residential
13.95	523	37	Rochdale	Other	400	Mixed

As evidenced by the table, the densities being delivered close to public transport hubs fall far short of the minimum density specification, particularly in the town centre. If the minimum density specification were to be met on average on the sites we have catalogued, then they would deliver an extra 400 dwellings close to town centre transport hubs, and at least another 100 outside of the town centre. In other words, adherence to the minimum density specification could deliver on average at least another 500 dwellings in Rochdale.

It is possible that when the 2020 edition of the brownfield register is eventually published there will be a significant upscaling in the densities being delivered, as was the case with Oldham. As they stand, the densities being delivered in Rochdale are clearly not compliant with the minimum density specification.



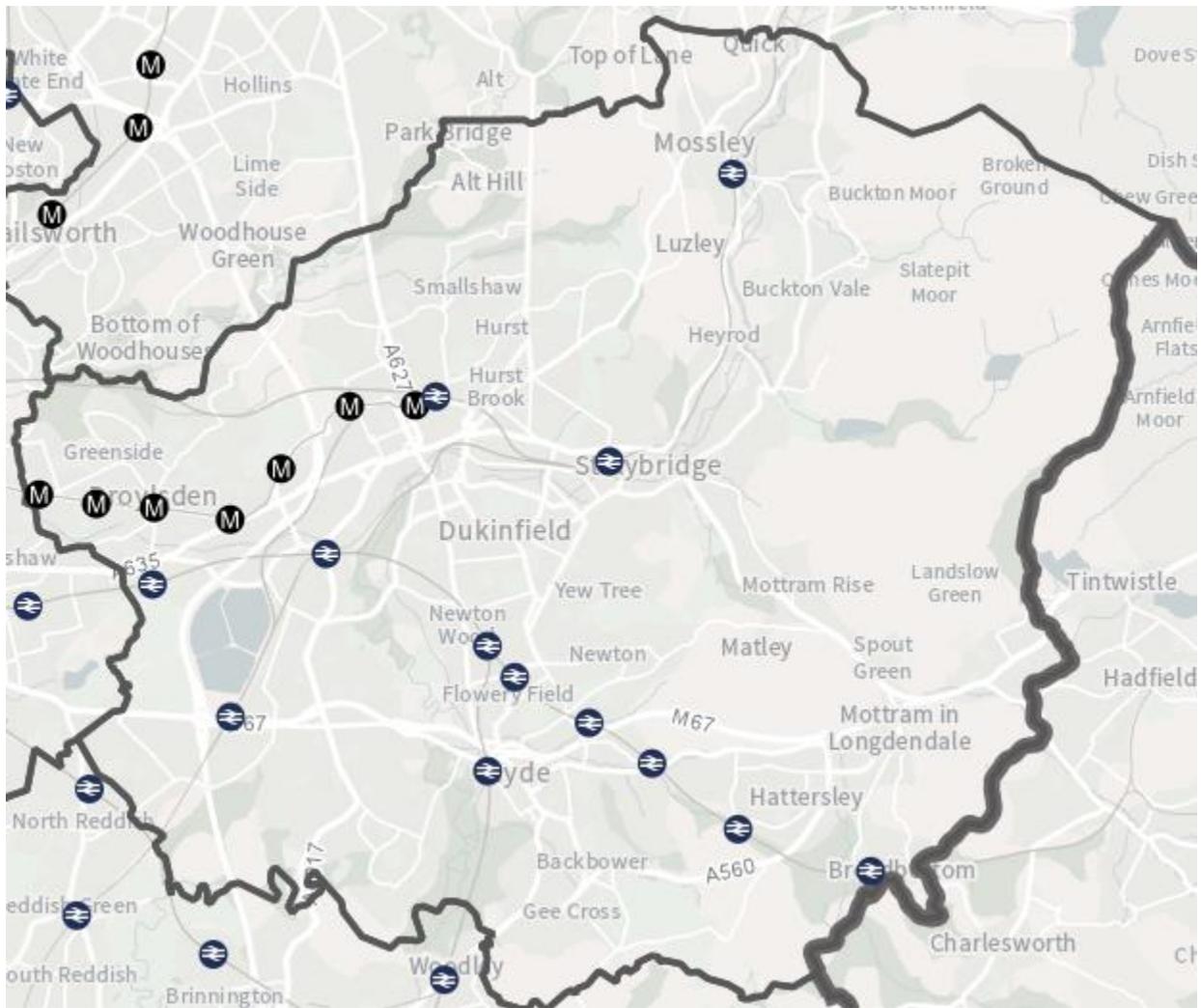
The table below tabulates the projected average densities at brownfield sites we consider to be within 800m of a Metrolink stop or a railway station in the borough of Tameside, for the 2020 brownfield register. Once again, the public transport hubs have been divided into two groups. Ashton-Under-Lyne railway station and tram stop have been classified as town centre transport hubs, along with Hyde Central railway station. All others have been treated as hubs outside of a town centre. An overview of Tameside's Metrolink stops and railway stations is provided on the next page.

Table. Housing densities on brownfield near transport hubs in Tameside (2020)

Hectares	Dwellings	Density	Council	Location	Distance (m)	Type
14.24	1,032	72	Tameside	Town	800	Residential
14.24	1,032	72	Tameside	Town	800	Mixed
2.71	417	154	Tameside	Town	400	Residential
2.71	417	154	Tameside	Town	400	Mixed
37.53	2,173	58	Tameside	Other	800	Residential
37.53	2,173	58	Tameside	Other	800	Mixed
21.97	1,423	65	Tameside	Other	400	Residential
21.97	1,423	65	Tameside	Other	400	Mixed

Of the three boroughs we have analyzed, Tameside appears to be the most successful in delivering the minimum density specification. The specification is easily being delivered at town centre hubs and the 800m spec is being delivered at hubs across the borough (highlighted in green).

However, the densities at sites within 400m of hubs outside of the town centres appear to be falling short of the minimum density specification. Our analysis shows that the average density (65 dwellings per hectare) is only slightly falling short of the 70 dwellings per hectare specification, but it is worth bearing in mind that the density specification is not a target but rather a minimum standard. While it would be unreasonable to expect every site to deliver the minimum density specification, it is arguably not unreasonable to expect the average density being delivered to exceed the minimum specification. By falling short, this means that the densities on a majority of sites are failing to deliver the minimum standard.



Summary

Due to the study only cataloguing brownfield sites close to transport hubs, a substantial number of sites have been overlooked in this survey:

- i. brownfield sites that meet the town centre criteria but are more than 800m from a transport hub;
- ii. sites in the SHLAA that meet the criteria of the specification but are not listed in the brownfield register.

The ambiguity of the specification criteria also poses another question: for the purposes of this survey only major town centres were interpreted as town centres/large designated centres, but what do small town centres such as Royton and Shaw qualify as? Would they be categorized as town centres, “large designated centres” or “other designated centres” or none of these? Without further clarity and explicit identification of which sites qualify for the higher densities it is next to impossible to accurately assess the deliverability of this aspect of the specification.

Regardless of the categorization issues, the study demonstrates that the minimum density specification is not being delivered in full on brownfield sites outside of town centres. If the densities of those sites omitted from this study follow the same pattern, then the minimum density specification is being under-delivered.

If this is the case—and it is a reasonable hypothesis based on the work undertaken by this study—then the strategic objectives of the plan are undermined, and the exceptional circumstances for releasing land from the Green Belt are compromised. Green Belt allocations were selected in accordance with the following spatial measures:

- The site is within the Site Selection good public transport area
- The site is considered to be brownfield land
- The site is within the buffer area of an identified town centre
- The site is within or adjacent to one of the 10% most deprived wards in England

The first three measures are consistent with the site criteria for the minimum density specification, and the fourth also will be in some instances. Clearly, if the minimum density specification is not being delivered then that creates two problems:

- i. PfE is not efficient in its use of existing land resources, which will lead to it failing to fully capitalize on economic assets and its sustainable transport infrastructure.
- ii. Failure to deliver the specified minimum densities on sites that are consistent with the four spatial measures will inevitably lead to more Green Belt sites being allocated for housing.

The first of these suggests a lack of commitment by the plan-makers to the strategic objectives of the plan, while the second appears at odds with the wording and intended goal of NPPF para. 141.

Soundness

Policy JP-H 4 (Density of New Housing) is not sound on the following grounds:

- It is not effective
- It is not consistent with NPPF para. 141 (Before concluding that exceptional circumstances exist...)

Reason

Ambiguous definitions in Policy JP-H 4 and outdated brownfield registers make it difficult to determine whether a site satisfies the criteria of the minimum density specification and if the prescribed minimum density will be delivered. The minimum density specification plays a vital role in the spatial strategy by delivering housing in a manner that fully exploits proximity to economic assets and sustainable transport infrastructure. Assessment of a sample of sites, that in our judgement satisfy the criteria, suggests that the minimum density specification is not being delivered in Oldham, Rochdale and Tameside, especially outside of the main town centres. If this is the case, then Policy JP-H 4 is not deliverable. If the plan is not able to demonstrate the deliverability of Policy JP-H 4 then this also means it is not compliant with NPPF para. 141.

Modification

The following amendments need to be made:

- Policy JP-H 4 should provide precise definitions for city centres, town centres, large designated centres and other designated centres. All the centres that these definitions apply to should be clearly identified i.e. all town centres should be listed, all designated centres and so forth.
- In addition to identifying the proposed density at the site, the SHLAAs should also clearly indicate if the site meets the criteria for the minimum density specification and state the prescribed minimum density, regardless of whether it will deliver the density.
- The plan should clearly state the average density projected in the SHLAAs for each density categorization in the specification, for each of the nine districts.
- The plan should clearly state how many of the sites are projected by the SHLAAs to deliver the prescribed density, and how many will not, for each density categorization in the specification, for each of the nine districts.
- All brownfield registers should be brought up to date.

There will be instances where delivering the prescribed minimum is not viable; however, it is reasonable to expect that the majority of sites that meet the criteria for the minimum density specification deliver the prescribed densities, and collectively the plan should be on average delivering densities that exceed the prescribed minimum densities.

No Green Belt allocated for housing should be released until the plan demonstrates the deliverability of its minimum density specification.

Appendix – Log of brownfield sites close to public transport hubs

Oldham (2020)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (r)	Type
HLA3104	0.02	12	600	Mumps	Town	400	Residential
SHA1128	0.10	10	100	Mumps	Town	400	Residential
SHA2016	5.76	250	43	Mumps	Town	400	Residential
SHA2031	0.08	7	88	Mumps	Town	400	Residential
HLA3082	0.36	16	44	Mumps	Town	400	Hybrid
SHA1069	0.03	9	300	Mumps	Town	400	Residential
SHA1068	0.25	24	96	Mumps	Town	400	Residential
SHA1067	0.23	22	96	Mumps	Town	400	Residential
HLA2796	0.03	30	1,000	Mumps	Town	400	Residential
HLA3696	0.03	8	267	Mumps	Town	400	Residential
SHA1057	2.34	224	96	Mumps	Town	400	Residential
SHA2129	3.95	332	84	Mumps	Town	400	Residential
SHA2015	0.46	44	96	Mumps	Town	400	Residential
SHA0139	0.06	6	100	Mumps	Town	400	Residential
SHA1053	0.20	41	205	Mumps	Town	400	Residential
SHA2002	1.27	175	138	Mumps	Town	400	Residential
HLA3462	0.43	42	98	Mumps	Town	400	Residential
SHA1050	0.08	10	125	Mumps	Town	400	Residential
HLA3678	0.04	11	275	Mumps	Town	400	Residential
HLA2856	0.40	30	75	Oldham Central	Town	800	Residential
SHA1998	1.12	244	218	Oldham Central	Town	400	Residential
SHA1759	1.50	185	123	Oldham Central	Town	400	Residential
HLA3588	0.14	26	186	Oldham Central	Town	400	Residential
HLA3588.1	0.14	10	71	Oldham Central	Town	400	Residential
SHA2132	0.12	18	150	Oldham Central	Town	400	Residential
HLA3766	0.02	8	400	Oldham Central	Town	400	Residential
HLA3566	0.01	5	500	Oldham Central	Town	400	Residential
HLA2831	0.15	126	840	Oldham King Street	Town	400	Hybrid
HLA3600	0.04	5	125	Oldham King Street	Town	800	Residential
HLA2831	0.15	126	840	Oldham King Street	Town	400	Residential
SHA1314	1.77	275	155	Oldham King Street	Town	400	Residential
SHA1797	0.01	12	1,200	Oldham King Street	Town	400	Residential
SHA2001	0.60	165	275	Oldham King Street	Town	400	Residential
SHA2000	2.12	433	204	Oldham King Street	Town	400	Residential
SHA1796	0.26	25	96	Oldham King Street	Town	800	Residential
SHA1002	0.59	24	41	Oldham King Street	Town	800	Residential
HLA3353	0.03	9	300	Oldham King Street	Town	800	Residential
Total	24.38	2,857	117		Town	800	Residential
Total	24.89	2,999	120		Town	800	Mixed
Total	23.06	2,764	120		Town	400	Residential
Total	23.57	2,906	123		Town	400	Mixed

Table. Housing densities on brownfield near transport hubs beyond Oldham town centre (2020)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (r)	Type
HLA2091(2)	0.59	26	44	Greenfield	Other	400	Residential
SHA1723	0.17	10	59	Greenfield	Other	400	Residential
HLA3734	0.10	5	50	Greenfield	Other	800	Residential
HLA3277	0.11	6	55	Shaw & Crompton	Other	800	Residential
HLA3481	0.12	10	83	Shaw & Crompton	Other	400	Residential
SHA0169	0.20	11	55	Shaw & Crompton	Other	400	Residential
SHA2046	0.14	10	71	Shaw & Crompton	Other	400	Residential
SHA2131	6.35	455	72	Shaw & Crompton	Other	400	Residential
SHA0161	0.50	20	40	Shaw & Crompton	Other	400	Residential
SHA1006	0.27	11	41	Shaw & Crompton	Other	400	Residential
HLA3028	1.93	80	41	Shaw & Crompton	Other	800	Residential
SHA0905	1.54	86	56	Shaw & Crompton	Other	800	Residential
HLA2836	0.09	10	111	Shaw & Crompton	Other	800	Residential
HLA2923	0.07	6	86	Shaw & Crompton	Other	800	Residential
SHA2133	0.02	6	300	Shaw & Crompton	Other	800	Residential
HLA3564	0.31	26	84	Derker	Other	400	Residential
SHA1630	0.63	35	56	Derker	Other	400	Residential
SHA0901	0.11	6	55	Derker	Other	400	Residential
SHA0899	1.76	100	57	Derker	Other	400	Residential
HLA2664	1.18	65	55	Derker	Other	800	Residential
HLA1863	0.07	6	86	Derker	Other	800	Residential
SHA2017	0.26	10	38	Derker	Other	800	Residential
SHA1858	0.07	7	100	Westwood	Other	400	Residential
HLA3387	0.03	1	33	Westwood	Other	400	Residential
HLA3384	0.11	14	127	Westwood	Other	400	Residential
HLA3385	0.02	5	250	Westwood	Other	400	Residential
SHA1862	0.88	49	56	Westwood	Other	400	Residential
HLA2659	0.49	32	65	Freehold	Other	800	Residential
HLA2999(1)	0.44	12	27	Freehold	Other	800	Residential
HLA2661	2.15	36	17	Freehold	Other	400	Residential
HLA2662	1.39	72	52	Freehold	Other	400	Residential
HLA2663	2.70	158	59	Freehold	Other	400	Residential
SHA0060	2.02	141	70	Freehold	Other	400	Residential
SHA0820	2.73	153	56	Freehold	Other	800	Residential
HLA3743	0.15	16	107	South Chadderton	Other	800	Residential
SHA2032	2.19	122	56	South Chadderton	Other	400	Residential
HLA3120	1.46	89	61	Hollinwood	Other	400	Residential
HLA3118	0.32	18	56	Failsworth	Other	800	Residential
HLA2842	0.42	26	62	Failsworth	Other	400	Residential
HLA3512	0.04	8	200	Failsworth	Other	400	Residential
HLA2357	0.13	22	169	Failsworth	Other	400	Residential
HLA3674	0.10	6	60	Failsworth	Other	800	Residential
SHA2059	0.84	34	40	Failsworth	Other	800	Residential
SHA0810	0.32	13	41	Failsworth	Other	800	Residential
SHA1683	1.53	216	141	Failsworth	Other	800	Residential
HLA3517	0.21	14	67	Failsworth	Other	800	Residential
SHA2060	0.23	9	39	Failsworth	Other	800	Residential
HLA2090	1.56	10	6	Failsworth	Other	800	Hybrid
Total	37.49	2,273	61		Other	800	Residential
Total	39.05	2,283	58		Other	800	Mixed
Total	24.76	1,470	59		Other	400	Residential
Total	24.76	1,470	59		Other	400	Mixed

Rochdale (2019)

Table. Housing densities on brownfield near transport hubs beyond Rochdale town centre (2019)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (m)	Type
SH2239	1.01	100	99	Rochdale Metro Station	Town	400	Residential
SH2219	0.27	14	52	Rochdale Metro Station	Town	400	Residential
SH2036	0.01	5	500	Rochdale Metro Station	Town	800	Residential
SH2218	0.04	6	150	Rochdale Metro Station	Town	800	Hybrid
SH2298	0.09	9	100	Rochdale Metro Station	Town	400	Residential
SH1159	0.02	8	400	Rochdale Metro Station	Town	400	Residential
SH0596	0.04	12	300	Rochdale Metro Station	Town	400	Residential
SH2234	0.04	28	700	Rochdale Metro Station	Town	400	Residential
SH1635	0.04	6	150	Rochdale Metro Station	Town	800	Residential
SH2242	11.94	486	41	Rochdale Metro Station	Town	800	Residential
SH2374??	1.12	55	49	Rochdale Metro Station	Town	800	Residential
SH2332	2.35	120	51	Rochdale Metro Station	Town	800	Residential
SH1840	0.33	17	52	Rochdale Railway / Met Station	Town	800	Residential
SH2199	0.19	12	63	Rochdale Railway / Met Station	Town	400	Residential
SH2071	0.05	5	100	Rochdale Railway / Met Station	Town	400	Residential
SH2240	2.15	120	56	Rochdale Railway / Met Station	Town	400	Residential
SH2302	0.03	8	267	Rochdale Railway / Met Station	Town	400	Residential
SH1780	0.05	15	300	Rochdale Railway / Met Station	Town	400	Residential
SH1745	1.04	41	39	Rochdale Railway / Met Station	Town	400	Residential
SH1019	0.07	8	114	Rochdale Railway / Met Station	Town	400	Residential
SH0483	0.04	6	150	Rochdale Railway / Met Station	Town	400	Residential
SH2304	0.06	5	83	Rochdale Railway / Met Station	Town	800	Residential
SH0660	1.67	67	40	Rochdale Railway / Met Station	Town	800	Residential
Total	22.61	1,147	51		Town	800	Residential
Total	22.65	1,153	51		Town	800	Mixed
Total	5.09	386	76		Town	400	Residential
Total	5.09	386	76		Town	400	Mixed

Table. Housing densities on brownfield near transport hubs beyond Rochdale town centre (2019)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (m)	Type
SH1882	0.43	17	40	Newbold Metro	Other	400	Residential
SH2197	0.09	5	56	Kingsway Business Park	Other	800	Residential
SH2279	0.56	68	121	Milnrow Metro	Other	400	Residential
SH2341	0.04	6	150	Milnrow Metro	Other	800	Residential
SH2064	1.59	50	31	Castleton Rail station	Other	400	Residential
SH1473	2.49	116	47	Castleton Rail station	Other	400	Residential
SH1717	0.02	6	300	Castleton Rail station	Other	400	Residential
SH1715	0.03	8	267	Castleton Rail station	Other	400	Residential
SH2080	1.34	29	22	Castleton Rail station	Other	800	Residential
SH2230	5.84	250	43	Castleton Rail station	Other	800	Residential
SH2326	1.36	47	35	Mills Hill Railway	Other	800	Residential
SH2292	0.39	14	36	Smithy Bridge Railway	Other	800	Residential
SH1550	7.5	174	23	Littleborough Railway	Other	400	Hybrid
SH0594	0.85	34	40	Littleborough Railway	Other	400	Residential
SH0569	1.34	53	40	Littleborough Railway	Other	800	Residential
SH2379	0.04	5	125	Littleborough Railway	Other	400	Residential
SH2207	0.05	8	160	Littleborough Railway	Other	400	Residential
SH1881	0.39	37	95	Littleborough Railway	Other	400	Residential
SH2231	0.26	9	35	Littleborough Railway	Other	800	Residential
SH2056	0.06	8	133	Littleborough Railway	Other	800	Residential
Total	17.17	770	45		Other	800	Residential
Total	24.67	944	38		Other	800	Mixed
Total	6.45	349	54		Other	400	Residential
Total	13.95	523	37		Other	400	Mixed

Table. Housing densities on brownfield near transport hubs beyond Tameside's town centres (2020)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (r)	Type
h-stmich-033	0.23	22	96	Ashton-Under-Lyne	Town	800	Residential
h-waterl-010	0.11	5	45	Ashton-Under-Lyne	Town	800	Residential
h-stmich-064	0.01	6	600	Ashton-Under-Lyne	Town	800	Residential
h-stpete-036	0.07	11	157	Ashton-Under-Lyne	Town	400	Residential
h-stpete-039	0.63	95	151	Ashton-Under-Lyne	Town	400	Residential
h-stpete-157	0.04	12	300	Ashton-Under-Lyne	Town	400	Residential
h-stpete-131	0.56	84	150	Ashton-Under-Lyne	Town	400	Residential
h-stpete-132	0.67	101	151	Ashton-Under-Lyne	Town	400	Residential
h-stpete-008	0.02	5	250	Ashton-Under-Lyne	Town	400	Residential
h-stmich-009	0.06	8	133	Ashton-Under-Lyne	Town	800	Residential
h-stpete-004	0.02	7	350	Ashton-Under-Lyne	Town	400	Residential
h-stpete-145	0.02	8	400	Ashton-Under-Lyne	Town	800	Residential
h-stpete-052	0.05	8	160	Ashton-Under-Lyne	Town	800	Residential
h-stpete-029	0.05	7	140	Ashton-Under-Lyne	Town	800	Residential
h-stpete-024	0.05	18	360	Ashton-Under-Lyne	Town	800	Residential
h-stpete-056	0.09	12	133	Ashton-Under-Lyne	Town	800	Residential
h-stpete-053	0.13	21	162	Ashton-Under-Lyne	Town	800	Residential
h-stpete-057	0.09	13	144	Ashton-Under-Lyne	Town	800	Residential
h-stpete-007	0.08	35	438	Ashton-Under-Lyne	Town	800	Residential
h-stpete-144	0.01	5	500	Ashton-Under-Lyne	Town	800	Residential
h-stpete-030	0.04	8	200	Ashton-Under-Lyne	Town	800	Residential
h-stpete-010	0.13	19	146	Ashton-Under-Lyne	Town	800	Residential
h-stpete-009	0.05	7	140	Ashton-Under-Lyne	Town	800	Residential
h-stpete-015	0.03	6	200	Ashton-Under-Lyne	Town	800	Residential
h-stpete-065	0.34	50	147	Ashton-Under-Lyne	Town	800	Residential
h-stpete-133	0.01	8	800	Ashton-Under-Lyne	Town	800	Residential
h-stpete-022	0.44	66	150	Ashton-Under-Lyne	Town	400	Residential
h-stpete-160	0.06	7	117	Ashton-Under-Lyne	Town	400	Residential
h-stpete-063	0.20	29	145	Ashton-Under-Lyne	Town	400	Residential
h-stpete-061	0.82	50	61	Ashton-Under-Lyne	Town	800	Residential
h-hydnew-083	0.22	11	50	Hyde Central	Town	800	Residential
h-hydnew-007	2.77	60	22	Hyde Central	Town	800	Residential
h-hydnew-003	5.69	155	27	Hyde Central	Town	800	Residential
h-hydgod-070	0.05	12	240	Hyde Central	Town	800	Residential
h-hydgod-069	0.10	14	140	Hyde Central	Town	800	Residential
h-hydwer-074	0.02	7	350	Hyde Central	Town	800	Residential
h-hydwer-059	0.03	6	200	Hyde Central	Town	800	Residential
h-hydwer-066	0.10	16	160	Hyde Central	Town	800	Residential
h-hydwer-062	0.06	9	150	Hyde Central	Town	800	Residential
h-hydgod-039	0.09	9	100	Hyde Central	Town	800	Residential
Total	14.24	1,032	72		Town	800	Residential
Total	14.24	1,032	72		Town	800	Mixed
Total	2.71	417	154		Town	400	Residential
Total	2.71	417	154		Town	400	Mixed

Table. Housing densities on brownfield near transport hubs beyond Tameside's town centres (2020)

Site ref	Hectares	Dwellings	Density	Station	Location	Distance (m)	Type
h-mossle-146	0.21	11	52	Mossley	Other	800	Residential
h-mossle-139	0.27	6	22	Mossley	Other	800	Residential
h-mossle-015	0.34	10	29	Mossley	Other	800	Residential
h-mossle-025	0.88	11	13	Mossley	Other	800	Residential
h-mossle-043	0.13	6	46	Mossley	Other	800	Residential
h-mossle-045	0.03	8	267	Mossley	Other	800	Residential
h-mossle-130	0.41	62	151	Mossley	Other	400	Residential
h-mossle-131	1.04	76	73	Mossley	Other	400	Residential
h-mossle-022	0.23	22	96	Mossley	Other	400	Residential
h-mossle-132	0.67	26	39	Mossley	Other	400	Residential
h-mossle-077	0.24	12	50	Mossley	Other	400	Residential
h-mossle-011	0.33	32	97	Mossley	Other	400	Residential
h-mossle-111	0.25	14	56	Mossley	Other	800	Residential
h-mossle-012	3.74	155	41	Mossley	Other	800	Residential
h-mossle-178	0.87	47	54	Mossley	Other	800	Residential
h-mossle-007	0.19	6	32	Mossley	Other	800	Residential
h-stpete-108	0.08	5	63	GuideBridge	Other	800	Residential
h-stpete-018	0.22	21	95	GuideBridge	Other	800	Residential
h-stpete-143	0.04	8	200	GuideBridge	Other	800	Residential
h-stpete-028	0.17	21	124	GuideBridge	Other	400	Residential
h-stpete-083	0.17	8	47	GuideBridge	Other	400	Residential
h-audens-082	0.24	8	33	Audenshaw	Other	800	Residential
h-audens-110	8.08	330	41	Droylsden	Other	400	Residential
h-droest-069	0.20	23	115	Droylsden	Other	400	Residential
h-droest-013	0.18	9	50	Droylsden	Other	800	Residential
h-droest-038	0.07	6	86	Droylsden	Other	400	Residential
h-droest-020	0.09	9	100	Droylsden	Other	400	Residential
h-droest-025	0.13	13	100	Droylsden	Other	800	Residential
h-drowst-031	0.08	8	100	Cemetery Road	Other	400	Residential
h-droest-035	1.24	127	102	Cemetery Road	Other	400	Residential
h-drowst-019	0.08	7	88	Edge Lane	Other	400	Residential
h-droest-014	0.02	5	250	Edge Lane	Other	400	Residential
h-droest-055	2.24	174	78	Edge Lane	Other	400	Residential
h-droest-004	1.34	116	87	Edge Lane	Other	800	Residential
h-stanth-041	0.08	5	63	Stalybridge	Other	400	Residential
h-stanth-043	0.11	11	100	Stalybridge	Other	400	Residential
h-stanth-032	3.70	277	75	Stalybridge	Other	400	Residential
h-stanth-066	0.04	6	150	Stalybridge	Other	800	Residential
h-stanth-038	0.39	38	97	Stalybridge	Other	800	Residential
h-dukstb-036	0.08	18	225	Stalybridge	Other	800	Residential
h-dukstb-020	0.13	3	23	Stalybridge	Other	800	Residential
h-dukstb-049	0.04	5	125	Stalybridge	Other	800	Residential
h-stanth-042	0.02	6	300	Stalybridge	Other	400	Residential
h-dukstb-024	0.30	38	127	Stalybridge	Other	400	Residential
h-dukstb-061	0.17	18	106	Stalybridge	Other	400	Residential
h-dukstb-023	0.51	51	100	Stalybridge	Other	400	Residential
h-dukstb-039	0.15	24	160	Stalybridge	Other	800	Residential
h-dukstb-040	0.21	10	48	Stalybridge	Other	800	Residential
h-hydnew-001	2.10	48	23	Hyde North	Other	800	Residential
h-hydnew-088	0.19	5	26	Hyde North	Other	800	Residential
h-hydnew-093	0.41	20	49	Flowery Field	Other	400	Residential
h-hydnew-066	0.90	33	37	Flowery Field	Other	800	Residential
h-hydnew-095	0.04	5	125	Flowery Field	Other	800	Residential
h-dentne-005	0.29	28	97	Denton	Other	800	Residential
h-hydgod-022	1.43	39	27	Newton For Hyde	Other	800	Residential
h-hydgod-034	0.15	15	100	Newton For Hyde	Other	800	Residential
h-hydgod-081	0.05	6	120	Newton For Hyde	Other	800	Residential
h-hydnew-020	0.10	5	50	Newton For Hyde	Other	800	Residential
h-hydgod-047	0.38	15	39	Hattersley	Other	400	Residential
h-hydgod-046	0.34	8	24	Hattersley	Other	400	Residential
h-longde-206	0.59	26	44	Hattersley	Other	400	Residential
h-longde-205	0.13	8	62	Hattersley	Other	800	Residential
Total	37.53	2,173	58		Other	800	Residential
Total	37.53	2,173	58		Other	800	Mixed
Total	21.97	1,423	65		Other	400	Residential
Total	21.97	1,423	65		Other	400	Mixed

Criterion 7: Our case for unexceptional circumstances

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Introduction

Places for Everyone (PfE) proposes to deliver approximately 165,000 dwellings across the plan area, between 2021 and 2037. This will be facilitated by 29 allocations on protected land, such as Green Belt and OPOL. Sites in the Green Belt were allocated in accordance with seven Site Selection Criteria. Six of the criteria were designed to support the strategic objectives of the plan, while the seventh, Criterion 7, was designed to deliver benefits to the local community.

These benefits include diverse housing mixes; including housing that is affordable and suitable for older people. The plan also proposes to offer exclusive high-end property under this criterion. While some of these aims are laudable, it is questionable that they constitute “exceptional circumstances” to take land out of the Green Belt in the case of sites that do not support any of the plan’s strategic objectives. Of the 18 allocations that satisfy Criterion 7, five do not satisfy any other Site Selection Criteria: JPA 9 (Walshaw); JPA 17 (Land South of Coal Pit Lane); JPA 19 (Bamford/Norden); JPA 27 (East of Boothstown); and JPA 32 (South of Hyde).

Most of the “local” benefits outlined under Criterion 7 may be localized in their impact, but they are not localized in their characteristics. Housing provision that is affordable and suitable for older people can easily be offered via any sizeable development, including those sites allocated under the other six Site Selection Criteria. In fact, many of the allocations that support the strategic objectives of the plan do make this offering, so it is not necessary to allocate sites that do not support the strategic objectives, on this basis. It might be arguable that such allocations may mitigate some localized issues, but by virtue of its strategic decision to re-distribute housing need across the plan area PfE has made a conscious decision to not take such a parochial view of housing provision. Some of the other reasons advanced, such as good access to public transport, seem at odds with the plan’s own Site Selection Criteria.

We are of the opinion that most of the arguments advanced under Criterion 7 do not qualify as exceptional circumstances, in the instances where the site does not support the strategic objectives of the plan.

Growth and Spatial Options

The GMSF houses two strategies: a “growth” strategy and a “spatial” strategy (*Growth and Spatial Options Paper*, July 2021). The growth strategy is concerned with the overall quantum of provision for housing and employment floor space, while the spatial strategy is concerned with the geographic distribution of development.

There have been three broad options for the growth strategy as far as housing was concerned:

- match provision to the baseline supply;
- meet the objectively assessed need (OAN);
- pursue a higher growth scenario.

PfE has elected to deliver the objectively assessed housing need, which stands at slightly over 10,000 homes per annum, amounting to approximately 165,000 dwellings between 2021 and 2037.

With regard to the spatial strategy, PfE retained the GMSF 2019 Spatial Option from the Greater Manchester Spatial Framework, modified to compensate for the withdrawal of Stockport. The Spatial Option had four key components:

- Optimising the baseline housing land supply, to ensure all opportunities to increase densities and identify additional sites have been explored;
- Concentrating development near to town centres and/or sustainable public transport hubs;
- Taking advantage of existing and planned global assets; and
- Delivering inclusive growth across Greater Manchester, seeking opportunities to boost the competitiveness of north Greater Manchester whilst sustaining the competitiveness of south Greater Manchester.

Four other spatial options were considered alongside the 2019 GMSF option:

- Business as usual
- Urban Max
- Public Transport Max
- Decentralisation/sub-urbanisation

The “Business as usual” option was incompatible with the growth option. However, “Urban Max” could deliver the growth strategy just using the baseline supply by employing high-density formations in and around town centres. The “Public Transport Max” option extended these high-density formations to sites close to sustainable transport hubs. Unlike the GMSF 2019 option, neither of these two options anticipated Green Belt release.

Therefore it is the strategic objectives of the spatial option that shape the argument for allocating housing and employment space in the Green Belt, rather than the growth option. The case for altering the Green Belt boundaries with respect to delivering the OAN must be made in the context of the chosen spatial option. If the planning authority cannot do this, then the Green Belt release is arguably not justified by the terms of the plan, because there are two other spatial options that can deliver the raw numerical need without Green Belt release.

Site Selection Criteria

Areas of Search were identified using the Site Selection Criteria (*Site Selection Background Paper*, July 2021) to ensure that identification of sites was driven by the overall spatial strategy and its objectives. The first six of the seven criteria support the spatial strategy. They are listed in full here, and a graphical example is provided below.

- **Criterion 1** – Land which has been previously developed and/or land which is well served by public transport.
- **Criterion 2** – Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors.
- **Criterion 3** – Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth.
- **Criterion 4** – Land within 800 metres of a main town centre boundary or 800m from the other town centres' centroids.
- **Criterion 5** – Land which would have a direct significant impact on delivering urban regeneration.
- **Criterion 6** – Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits.
- **Criterion 7** – Deliver significant local benefits by addressing a major local problem/issue.

Oldham

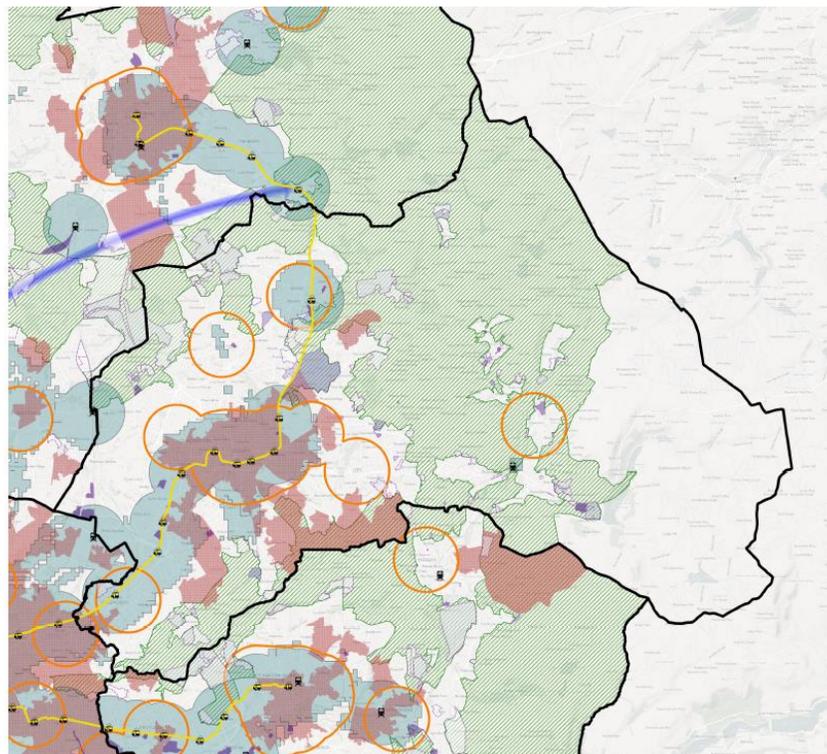
Site Selection Criteria

Legend

- Criterion 1: Call for Sites by PDL
 - No PDL
 - Up to 10% PDL
 - 10% - 25% PDL
 - 25% - 50% PDL
 - 50% - 75% PDL
 - 75%+ PDL
- Criterion 1: Good transport accessibility
- Criterion 2: Strategic assets
- Criterion 3: Strategic corridors
- Criterion 4: Town centre buffers
- Criterion 5: 10% most deprived areas
- Existing Green Belt
- Railway stations
- Guided busway stops
- Metrolink stops
 - Existing
 - Under construction
- Metrolink lines
 - Existing
 - Under construction
- HST Proposed route
- GM Local authorities

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0 0.5 1 1.5 2 mi



Criterion 7

Criterion 7 relates to sites which can demonstrate direct links to addressing a specific local need. To meet this criterion a site would be required to bring benefits across a wider area than the development itself and/or would bring benefits to existing communities. The types of benefits that potential sites could deliver are:

- Provide deliverable sites for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end market housing area and / or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north,
- Provide a specific type of housing to meet a locally identified need, e.g. older persons accommodation,
- Development would allow for the re-use and enhancement of an at risk heritage asset,
- Development would allow for the provision/retention of unviable community facility e.g. sports pitches,
- Development would deliver significant highway improvements which will help to resolve existing issues in the wider area,
- Development that can contribute to the delivery of additional healthcare and other wellbeing facilities.

There are 18 allocations that satisfy Criterion 7 (*Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary*, July 2021), although there are only five allocations where Criterion 7 is the only criteria they satisfy: JPA 9, JPA 17, JPA 19, JPA 27 and JPA 32. In addition to these five sites, Hanging Chadder was previously allocated under Criterion 7 as GMA 17 in the GMSF.

Table. Sites allocated under Criterion 7 only

Key	Allocation	District	Dwellings
JPA 9	Walshaw	Bury	1,250
JPA 17	Land South of Coal Pit Lane	Oldham	175
JPA 19	Bamford/Norden	Rochdale	450
JPA 27	East of Boothstown	Salford	300
JPA 32	South of Hyde	Tameside	440
<i>GMA 17</i>	<i>Hanging Chadder</i>	<i>Oldham</i>	
Total			2,615

Exceptional circumstances

Site Selection Criteria 1–6 shape the strategic objectives of the plan as the “exceptional circumstances” for releasing land from the Green Belt. However, Criterion 7 does not support the strategic objectives and advances a local level case for exceptional circumstances.

For example, the Criterion 7 cases for JPA 9 (Walshaw) and JPA 17 (Land South of Coal Pit Lane) argue that the sites have the potential to offer a diverse mix of housing types, including affordable housing for the local area. Even if affordable housing is regarded as an exceptional circumstance, most large developments have the potential to offer a diverse mix of housing types, including many of the sites that were allocated under the other six criteria or listed in the Strategic Housing Land Availability Assessment. It is difficult to see how provision of a diverse housing offer on sites that do not support the strategic objectives of the plan can be regarded as an exceptional circumstance when such a provision is already being made at sites that do.

On the other hand, the cases for JPA 19 (Bamford/Norden) and JPA 27 (East of Boothstown) stretch credulity by arguing for the provision of high-end exclusive property as an exceptional circumstance. While the provision of affordable housing has sympathetic social objectives, the local-level case for these two allocations seems contradictory at best, in the context of PfE’s social and economic objectives. If such an argument were to be accepted then this would surely violate the golden principle at the heart of Green Belt policy, in that market forces alone cannot be trusted to deliver socially, economically and environmentally conscientious development.

The case for JPA 9 also makes the argument that the site has potential to deliver housing for older people. It would be interesting to know how this conclusion was reached. Most modern developments should be looking towards Lifelong Housing Certification, and most large developments are probably capable of providing this, but in terms of location then older people would be better served by housing close to local amenities and with access to good local transport. In other words, the older population would be one of the major beneficiaries of the strategic objectives of the plan. In that respect you would expect locations considered suitable for housing for older people to satisfy at least one of the other Site Selection Criteria.

The cases for JPA 17 (Land South of Coal Pit Lane) and JPA 32 (South of Hyde) also put forward the argument that the sites have good access to public transport, but this seems at odds with the Site Selection Criteria. Sites that are “well served by public transport” are allocated under Criterion 1, which is defined using several spatial measures. Neither of these sites was located in the Site Selection good accessibility area so why is PfE partially basing the case for exceptional circumstances on good access to public transport?

In conclusion, the arguments advanced under Criterion 7 for the most part lack merit or seem counter-intuitive, and even contradictory in regards to its claims about good transport accessibility. In regards to the laudable provision of housing that is affordable and suitable for older people, such arguments would be far more convincing if made within the context of the plan’s strategic objectives.

Soundness

The following policies are not sound on the grounds they are not consistent with NPPF para. 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...):

- JPA 9 – Walshaw
- JPA 17 – Land South of Coal Pit Lane
- JPA 19 – Bamford/Norden
- JPA 27 – East of Boothstown
- JPA 32 – South of Hyde

Reason

The cases for exceptional circumstances advanced under Site Selection Criterion 7 mostly lack merit, and in some instances are counter-intuitive and even contradictory:

- Provision of housing that is diverse, affordable and suitable for older people – Such housing could just as easily be provided via sites that support the strategic objectives of the plan or are listed in the SHLAA. Older people with mobility problems and who do not own a vehicle would be one of the primary beneficiaries of the strategic objectives of the plan.
- Provision of exclusive high-end property – Such an argument has no laudable social or economic objective to recommend it and comes into conflict with the core principles at the heart of Green Belt policy.
- Provision of housing with good access to public transport – This directly contradicts the Site Selection Criteria for the plan. Any site that is within the Site Selection good accessibility area is allocated under Criterion 1, and these sites are not.

The first six Site Selection Criteria support the strategic objectives of the plan, and the strategic objectives are advanced as exceptional circumstances. However, Criterion 7 does not support the strategic objectives so what makes it an exceptional circumstance? We are being asked to simply accept the premise that a local benefit is automatically an exceptional circumstance but no evidence or justification is presented to that effect.

Modification

Criterion 7 from the Site Selection Criteria should be deleted.

Consequently, the following sites that were allocated under Criterion 7 will need to be deleted:

- JPA 9 – Walshaw
- JPA 17 – Land South of Coal Pit Lane
- JPA 19 – Bamford/Norden
- JPA 27 – East of Boothstown
- JPA 32 – South of Hyde

Policy JP-J 4: An analysis of PfE employment land supply buffers

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Introduction

Places for Everyone (PfE) has identified its employment land supply requirements as 1,453,000 sqm of office floor space and 2,534,000 sqm of industrial and warehousing floor space across the plan area between 2021 and 2037, based on past completions.

There is currently a surplus of office space but a shortfall of 728,000 sqm in industrial and warehousing floor space. To this end PfE has allocated 2,633,000 sqm of employment land in the Green Belt.

An assessment of employment land by Nicol Economics for the Greater Manchester Spatial Framework concluded that a margin of up to 25 percent on the land supply was justifiable, but a "supply margin of 50% falls well outside the bounds of what has been generally used elsewhere". PfE adopts a 31 percent margin in its two employment land supply policies, but in reality the margin on the industrial and warehousing land supply is effectively 56 percent over the plan period, and 75 percent in total. It does not evidence or justify its policy margin, the surplus of land over the plan period, and the allocation of land beyond the lifespan of the plan.

The allocations were selected in accordance with the land requirements of the Greater Manchester Spatial Framework and carried over to PfE. However, PfE uses a different methodology to identify the employment land requirements, resulting in a significantly lower need. The allocation policies do not appear to have been updated to reflect the newer targets.

The lack of evidence and justification for the excessive allocation of land in the Green Belt is in contravention of the National Planning Policy Framework (NPPF), which stipulates that alterations to Green Belt boundaries must be fully evidenced and justified. A judicial review in 2020 concluded that a plan must take the up to date position in respect of all material considerations that inform the exceptional circumstances for altering the Green Belt boundaries.

As a result, the allocations on Green Belt land for industrial and warehousing usage are no longer evidenced or justified, and therefore are not sound.

Employment needs

PfE assesses employment land requirements at city region level (i.e. Greater Manchester less Stockport), divided into two categories: office space and industrial & warehousing. Past completions are used to identify the employment floor space requirements over the plan period:

Table. Weighted gross need (square metres)

	Annual	2021–2037
Offices	90,800	1,453,000
Industrial & warehousing	158,400	2,534,000

It is normal to affix a margin/buffer to provide some flexibility to allow for:

- Potential margin of error associated with any forecasting process for future need
- Choice of sites to facilitate competition in the property market
- Some level of vacant floor space within functioning markets
- Flexibility to allow for any delays in individual sites coming forward.

PfE sets the margin at 31 percent:

Table. PfE floor space (square metres)

	Annual	2021–2037
Offices	119,000	1,910,000
Industrial & warehousing	208,000	3,330,000

Policy JP-J 3 establishes that at least **1,900,000 sqm** of new office floor space will be provided in the plan area 2021–2037.

Policy JP-J 4 establishes that at least **3,330,000 sqm** of new industrial and warehousing floor space will be provided in the plan area 2021–2037.

Floor space supply

The existing floor space supply over the PfE area is:

- Offices: 3,129,263 sqm
- Industrial and warehousing: 1,805,509 sqm

In addition to the baseline supply, PfE has allocated 2,155,000 sqm of floor space in the Green Belt for industrial and warehousing usage to be delivered 2021–2037, and a further 478,000 sqm post-2037 (*Places for Everyone Employment Topic Paper*; July 2021, para 7.20).

A further 21,500 sqm of floor space was also allocated for office purposes. Along with the industrial and warehousing supply and allocations, the total supply of floor space for the plan period is:

- Offices: 3,150,763 sqm
- Industrial and warehousing: 3,960,389 sqm

It is illuminating to compare the total amount of floor space that will be made available, during the plan period and beyond, to the identified need:

Table. PfE office floor space (square metres)

	Floor space	Surplus (%)
Gross need	1,453,000	0%
Policy JP-J 3 target	1,900,000	31%
Plan period (2021–2037)	3,150,763	117%
Total floor space (2021–)	3,150,763	117%

Table. PfE industrial & warehousing floor space (square metres)

	Floor space	Surplus (%)
Gross need	2,534,000	0%
Policy JP-J 4 target	3,330,000	31%
Plan period (2021–2037)	3,960,389	56%
Total floor space (2021–)	4,438,182	75%

There is an organic surplus of office space across the plan area, and no land has been allocated for office usage with the exception of a strategic allocation of 21,500 sqm at Medipark (JPA 3.1). However there is a clear deficit of industrial and warehousing floor space over the plan period (a supply of 1,805,509 sqm against an identified need of 2,534,000 sqm) and it is under this rationale that allocating employment land in the Green Belt has been justified.

However, the provision of floor space for industrial and warehousing purposes (taking the allocations along with the baseline supply) far outstrips the identified need. Over the plan period there is a surplus of 56 percent, and if you also take allocations that exceed the lifespan of the plan into consideration this increases to 75 percent. At the heart of this issue is the scale of the margin: how much land above the identified need should be allocated?

Margin on supply

The *Updated Note on Employment Land Needs for Greater Manchester* paper (March 2021) states that buffers are typically 10–20 percent in magnitude, or 2 to 5 years for a 20-year plan. A 5-year margin for a 16-year plan equates to 31 percent, which is adopted by policies JP-J 3 and JP-J 4.

In *Note on Employment Land needs in Greater Manchester* (February 2020) Nicol Economics concluded that a 25 percent margin was justifiable. It is worth noting that Nicol Economics advocated for a 4 or 5 year margin on the basis that margins are commonly set in annual multiples and the advocated 25 percent margin would fall between 4 and 5 years. The 5-year margin that was selected by the GMSF stood at 29 percent.

PfE has retained a 5-year margin, but has not been candid in regard to why it was selected. The plan has been reduced to a 16-year timeframe, so the 25 percent margin that Nicol Economics believed to be justified would reduce to a 4-year margin. *Updated Note on Employment Land Needs for Greater Manchester* further advances the argument for a 4–5 year buffer by adding “especially given that we are now relying on the past completions approach with its inherent backward looking focus”. However, this justification seems strange in relation to its comment in para 4.11 of *Places for Everyone Employment Topic Paper* that states “Most employment land studies rely primarily on past take-up as the preferred approach to assessing future needs for Industrial and Warehousing land.” In other words, the typical approach is to use past completions, and typical margins range from 10–25 percent for plans of up to 20 years. There is nothing unusual by being “backward looking” that is in need of mitigation.

In this context, Nicol Economics found a 25 percent margin to be justified, equivalent to 4 years for a 16-year plan. A 4-year margin would set the industrial and warehousing land requirement at 3,168,000 sqm, equating to a 1,363,000 sqm deficit. However, approximately double that (2,633,000 sqm) has been allocated in the Green Belt, equating to a total land supply of 4,438,000 sqm (3,960,389 sqm during the plan period). This equates to a margin of 75 percent (56 percent over the plan period). The report by Nicol Economics at no point justifies a margin of this magnitude. In fact, para. 5.9 of *Note on Employment Land needs in Greater Manchester* explicitly states 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).”

PfE does not adequately justify the adoption of a 5-year margin over a 4-year margin in light of the analysis by Nicol Economics. It does not evidence and justify the 660,389 sqm surplus industrial and warehousing land over the plan period (*Places for Everyone Employment Topic Paper*; para. 7.15), and nor does it evidence and justify the 478,000 sqm of allocated land post-2037. The GMSF used economic forecasting to project employment land needs which led to a higher land requirement of 4,100,000 sqm of floor space in the 2020 draft. However, it would appear these allocations have been carried forward by PfE but the overall quantum has not been reduced to reflect the lower land requirements established by the new methodology.

Exceptional circumstances

The National Planning Policy Framework (NPPF) para. 140 stipulates that “Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”. PfE does not evidence and justify the following:

- Selection of a 5-year (31 percent) margin over a 4-year (25 percent) margin on industrial and warehousing land supply.
- A 660,389 sqm surplus (over the 5-year margin) of industrial and warehousing land over the plan period.
- The allocation of 478,000 sqm of industrial and warehousing land post-2037.

Legal precedent has established that failing to consider a reduced land requirement is a material consideration when concluding if exceptional circumstances have been met for altering Green Belt boundaries. In [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#) the judge upheld Ground Three of the claimant’s case in relation to housing need. The judgement found that the exceptional circumstances justifying Green Belt release had not been adequately explained or consulted on in light of the drop in requirement. The judgment concluded that the plan had to take the up to date position in respect of all material considerations and that must include the actual level of housing requirement if the policy had become out of date.

While the site selection is driven by the spatial strategy, the overall scale of Green Belt release is clearly tied to the outstanding land requirement. Para. 6.33 of the *Places for Everyone Joint Development Plan Document* states “The existing supply of potential industrial and warehousing sites identified in the districts’ strategic employment land availability assessments are insufficient to meet the overall identified need ... The only realistic option for doing so is to remove some land from the Green Belt.” The total floor space area of the industrial and warehousing allocations is numerically equivalent to the outstanding identified need in the 2020 draft of the GMSF. They have clearly been carried over to PfE, but have not been scaled back to reflect the reduced land requirement. This is in contravention of the Aireborough judgement in instances where the land requirement is a contributing factor to exceptional circumstances.

Soundness

The following policies are not sound on the grounds that when considered in conjunction they are not consistent with NPPF para. 140 (Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified):

- Policy JP-J 4 (Industry and Warehousing Development)
- Policy JP-G 10 (The Green Belt)

Reason

PfE does not evidence and justify the following:

- Selection of a 5-year (31 percent) margin over a 4-year (25 percent) margin on industrial and warehousing land supply.
- A 660,389 sqm surplus (over the 5-year margin) of industrial and warehousing land over the plan period.
- The allocation of 478,000 sqm of industrial and warehousing land post-2037.

The sites named in the industrial allocation policies were allocated in the GMSF, in accordance with the target set by Policy GM-P 4 to deliver 4,100,000 sqm of industrial and warehousing floor space. The allocations were carried forward by PfE but have not been aligned with the reduced floor space requirement.

This fails to take into account the legal precedent established by [Aireborough Neighbourhood Development Forum v. Leeds City Council \[2020\] EWHC 1461 \(Admin\)](#). The judgement found that the exceptional circumstances justifying Green Belt release had not been adequately explained or consulted on in light of the drop in requirement. The judgement concluded that the plan must take the up to date position in respect of all material considerations that contribute to the exceptional circumstances for Green Belt release.

Modification

The following modifications need to be made:

3. The margin on the employment land supply needs to be reduced to 4 years and the revised target needs to be adopted by Policy JP-J 3 and Policy JP-J 4.
4. The following industrial allocation policies need to be amended (either through deletion of sites or by scaling back the land mass of the allocations) so that the overall quantum of Green Belt release is brought in line with Policy JP-J 4:
JPA 1.1 (Heywood/Pilsworth); JPA 2 (Stakehill); JPA 4 (Bewshill Farm); JPA 5 (Chequerbent North); JPA 6 (West of Wingates); JPA 10 (Global Logistics); JPA 14 (Broadbent Moss); JPA 29 (Port Salford Extension); JPA 30 (Ashton Moss West); JPA 33 (New Carrington); JPA 34 (M6 Junction 25); JPA 36 (Pocket Nook); JPA 37 (West of Gibfield).

Policy JP-Strat 7: Over-saturation of the North-East Growth Corridor

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Introduction

One of the core objectives of Places for Everyone (PfE) is to boost competitiveness in the North of the conurbation. To this end the plan hosts two strategic policies: the Wigan-Bolton Growth Corridor and the North-East Growth Corridor along the M62, spanning Bury, Oldham and Rochdale. In conjunction with these strategic policies, the plan also allocates several sites in the Green Belt for industrial and warehousing purposes, with the stated aim of maintaining a diverse supply of employment sites and delivering economic growth in the North.

Due to the decline of manufacturing, the floor space requirement will be largely driven by the demand for storage and distribution facilities which historically have lower Gross Value Added change than the overall economy. There are concerns that if the historical growth rates are maintained then the North-East Growth Corridor, with its dependency on warehousing, would see lower wage growth than the rest of the conurbation, and rather than “level up” the wealth gap between North and South would increase.

Also, the lower employment densities associated with warehousing jobs compare unfavourably to other jobs, resulting in a large quantity of employment space in a relatively small geographic area being lost to a sub-optimal purpose. This in itself will lead to lower levels of job creation in comparison to other employment areas in Greater Manchester of comparable size. A tangential problem with the plan’s dependency on warehousing is the industry’s susceptibility to automation: the plan assumes that employment densities in warehousing will remain constant but this is unlikely to be the case, and a significant fluctuation in employment density in this sector would likely lead to a substantial number of job losses, baking unemployment in to the North’s economic future.

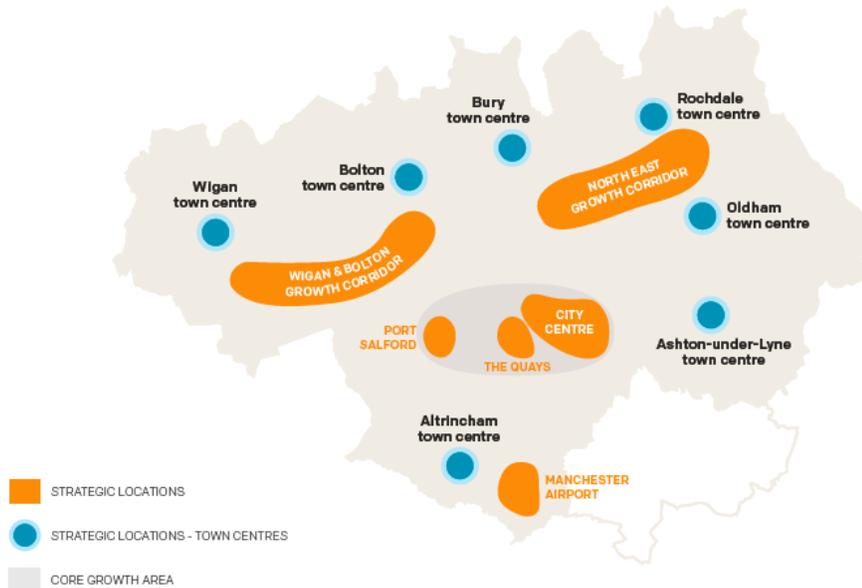
Finally, there are worries that an over-supply of warehousing over a relatively small geographic area could result in the industry in this area effectively cannibalising itself i.e. competing with each other rather than other regions of Greater Manchester and beyond. Taking business off each other could result in a “race to the bottom” and downward pressure on wages.

The driving dynamics of the plan appear to be less concerned with re-distributing inclusive growth across Greater Manchester and more with outsourcing less lucrative industries to the North; thereby freeing up premium land in the South of the conurbation for more attractive opportunities and essentially turning Bury, Oldham and Rochdale into satellite towns of the City of Manchester.

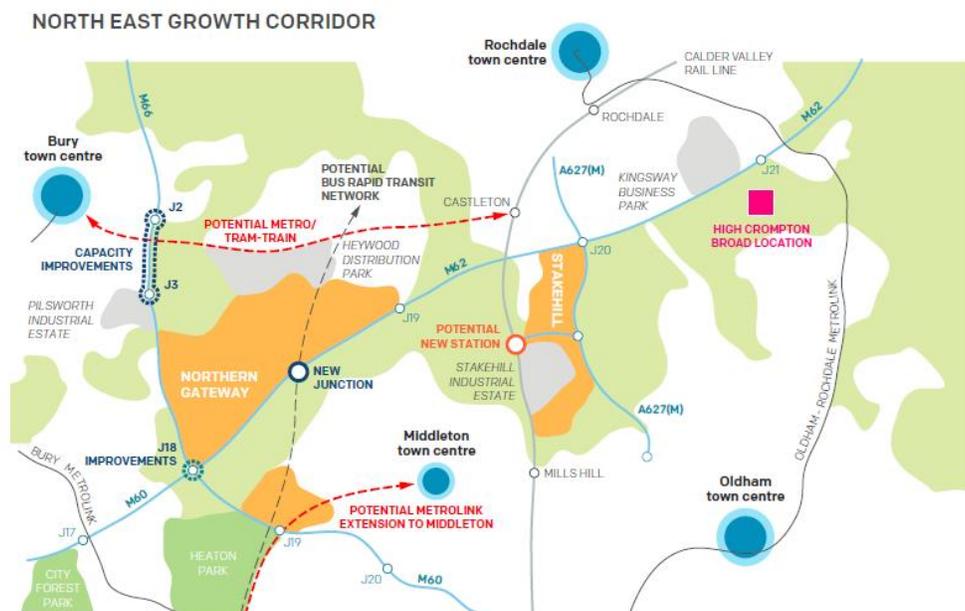
Boosting Northern competitiveness

PfE hosts two policies designed to boost northern competitiveness: the Wigan-Bolton Growth Corridor and the North-East Growth Corridor, spanning Bury, Rochdale and Oldham.

STRATEGIC LOCATIONS

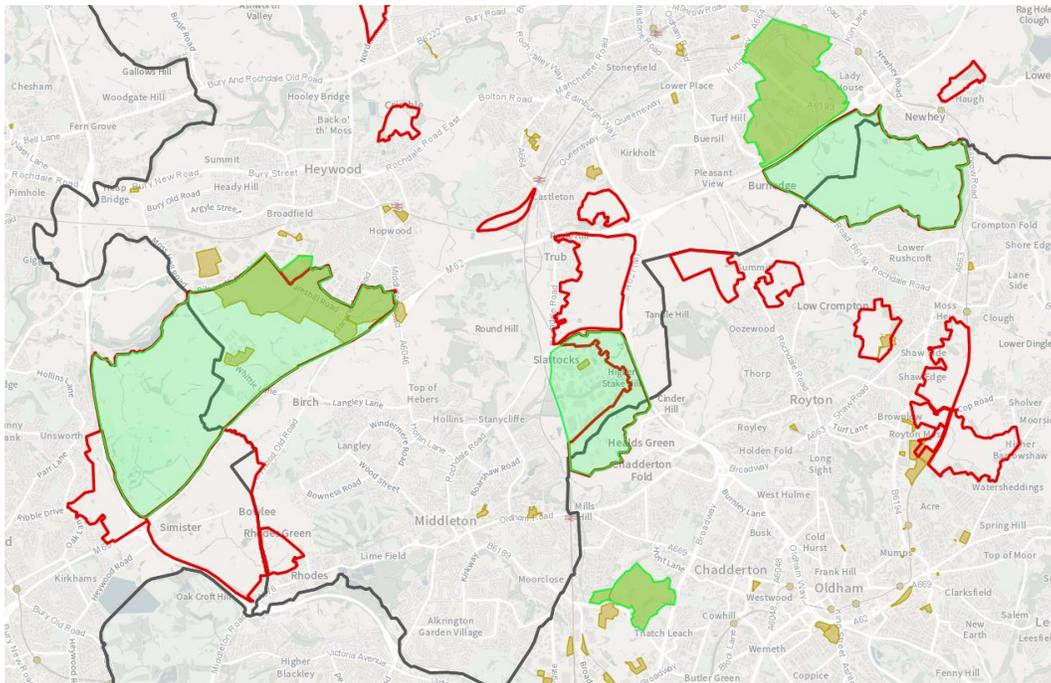


PfE has identified over 1 million sqm of employment land along the M62 North-East Corridor, to be delivered over the plan period (*Places for Everyone Employment Topic Paper* ; July 2021, para 8.37).



M62 North-East Corridor

The North-East growth Corridor will be supported by three strategic allocations in the Green Belt: JPA 1.1 (Heywood/Pilsworth), JPA 1.2 (Simister and Bowley) and JPA 2 (Stakehill). In addition to the allocations, there are several other sizeable sites that have been identified for industrial and warehousing usage: the land bounded by Manchester Road in Rochdale (which forms part of JPA 1.1), Foxdenton and the adjoining former Junction Mill south of Stakehill, and Kingsway Business Park. There is also the broad location at High Crompton which was previously allocated as Kingsway South in the Greater Manchester Spatial Framework.



These six sites alone will deliver over 1,100,000 sqm of industrial and warehousing floor space between 2021 and 2037. The six locations, all within a 3 mile radius of Stakehill, will deliver a quarter of all the plan area's industrial and warehousing floor space. Beyond the plan period, they will potentially deliver another 675,000 sqm. Along with 260,000 sqm that already exists at Stakehill, there would be around 2,000,000 sqm of floor space along the North-East Corridor.

Table. I&W floor space along the M62 North-East Corridor (square metres)

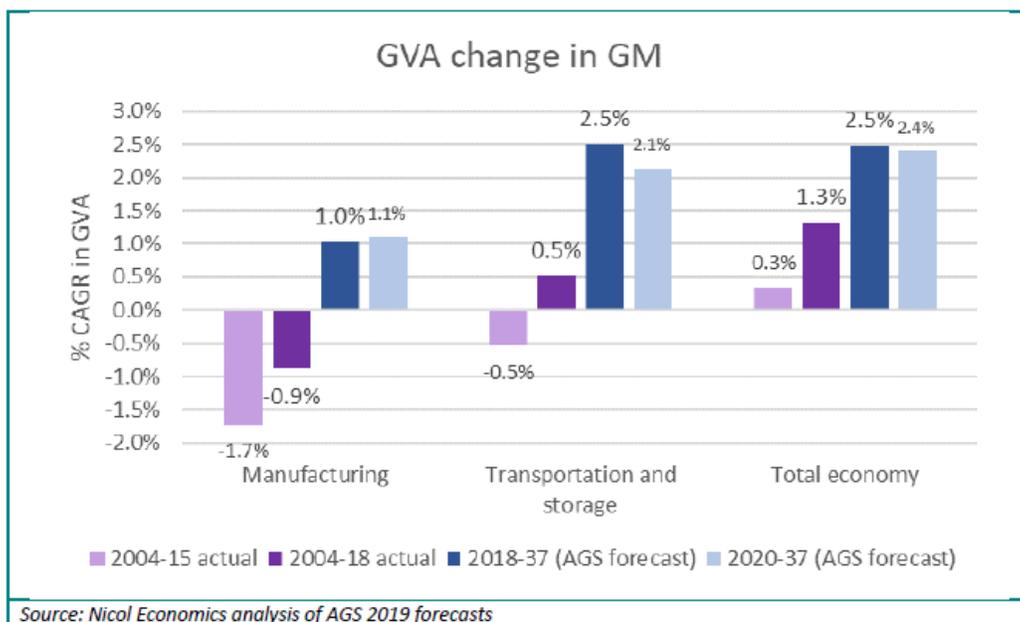
Ref	Site	2021–2037	2021–
JPA 1.1	Heywood / Pilsworth	700,000	1,065,000
EMP88	Land bounded by Manchester Rd	135,460	135,460
OLD0051	Foxdenton	60,387	60,387
OLD0064	Former Junction Mill	4,865	4,865
JPA 2	Stakehill	150,000	150,000
EMP01	Kingsway Business Park	51,831	51,831
GMA 3	Kingsway South		310,000
	M62 North-East Corridor	1,102,543	1,777,543

Levelling down?

There are currently 18,000,000 sqm of industrial and warehousing floor space across the plan area (*Note on Employment Land needs in Greater Manchester*, February 2020; Table A3). If all the floor space that has been identified along the North-East Corridor is ultimately delivered, then a small geographic area within a 3 mile radius will account for around 10 percent of all the industrial and warehousing floor space in the plan area.

The GMCA's own data suggests that this could be counter-productive, and could inadvertently lead to a widening of the wealth gap between North and South.

The Gross Value Added (GVA) change for manufacturing has undergone an annual decline between 2004 and 2018. Over the same period, transportation and storage have undergone GVA growth, but it has been below the level of the overall economy in Greater Manchester (*Note on Employment Land needs in Greater Manchester*, February 2020; Figure 4.2).



Compounded over the 2004–2018 period, manufacturing has seen a decline of 12 percent in GVA. Conversely, transport and storage have seen GVA grow by 7 per cent over the same period, compared to 20 percent for the total economy.

Lower GVA growth limits wage growth, while GVA decline would invariably lead to job losses in those sectors affected. Providing so much industrial and warehousing space in such a confined location would appear to be tying the local economy to a model that would at best see wages rise more slowly than in the rest of Greater Manchester, and at worst would see unemployment levels rise. Rather than boosting competitiveness, the wealth gap between the northern and southern districts of Greater Manchester would widen.

Analysis of the Accelerated Growth Scenario undertaken by Nicol Economics (*Note on Employment Land needs in Greater Manchester*, February 2020; Table A1) concluded that employment land requirements were driven by B1 (office) space and B8 industrial space (storage or distribution). There was a negative demand for B1 (industrial processes) and B2 (general industrial) space, driven by the decline in manufacturing. It is therefore reasonable to assume that the bulk of the industrial and warehousing allocations are driven by demand for storage facilities and distribution centres. This has important implications for employment because the average Gross External Area (GEA) per warehousing job (80–90 sqm) is roughly double that of other industrial occupations (40–50 sqm). Industrial and warehousing in general compares unfavourably to the employment densities of office jobs (14 sqm).

Table A1: 2019 AGS scenario - implications for employment floorspace need 2020 to 2037					
	All	B1 Office	B1/2 I&W	B8 I&W	Non-B Class
	000s	000s	000s	000s	000s
Employment change 2018-37					
Total change in jobs detailed method	219.8	87.9	-34.9	16.7	150.1
Total change in jobs high level apportionment	219.8	124.8	-32.4	20.5	107.0
Average	219.8	106.3	-33.6	18.6	128.6
Annual average	11.6	5.6	-1.8	1.0	6.8
Applied over 17 years 2020 to 2037	196.7	95.1	-30.1	16.6	115.0
Convert to floorspace					
FTE jobs		89%	96%	91%	
Sqm NIA per job		12.0			
Sqm GEA per job	Mid	14.1	40	77	
Sqm GEA per job	High	14.1	50	90	
Vacancy rate		10%	10%	10%	
Implied floorspace needed	Mid	1,324	-1,280	1,292	
	Higher	1,324	-1,600	1,510	
	Simple average	1,324	-1,440	1,401	
	Re-weighted average for I&W*	1,324	-1,440	1,365	
Average annual		78	-85	82	

Source: Nicol Economics calculations. Note: weighted 2/3 to Mid and 1/3 to Higher figure

Warehousing is an inefficient use of employment space because a large quantity of floor space is given over to the storage of goods rather than employment. The provision of storage facilities is of course a logistical necessity for industry, but its purpose is predominantly to support other industry, manufacturing and services. If the goal is to use it to drive employment then it is an extremely sub-optimal solution due to the low employment densities. If the goal is to use it to close the wealth gap with other areas then it is doomed to fail due to the low GVA growth.

Such a huge concentration of warehousing in such a confined area will lead to low levels of job creation, and slow wealth creation. These problems will also be exacerbated due to the rise of automation. PfE assumes a static GEA density for warehousing (77 sqm per FTE job), but it is not difficult to envisage this density doubling over the next couple of decades.

Supporting Long-Term Economic Growth

The following policies are not sound on the grounds that when considered in conjunction they are not positively prepared:

- Policy JP-Strat 6 (Northern Areas)
- Policy JP-Strat 7 (North-East Growth Corridor)
- **Policy JP-J 1** (Supporting Long-Term Economic Growth) [G7 component]
- JPA 1.1 (Heywood/Pilsworth)
- JPA 1.2 (Simister and Bowley)
- JPA 2 (Stakehill)
- High Crompton Broad Location

Reason

Warehousing already comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in Greater Manchester. The North-East Growth Corridor would further exacerbate this imbalance. *Note on Employment Land needs in Greater Manchester* (February 2020) concludes that due to the decline of manufacturing the requirement for new industrial and warehousing floor space is largely driven by the demand for storage and distribution facilities.

However, compounded GVA growth for storage and distribution between 2004 and 2018 has seen slower growth than that of the overall economy in Greater Manchester (7 percent compared to 20 percent). This economic model will not deliver the "significant increase in economic growth" as promised by Policy JP-Strat 6, nor will it deliver a "better distribution of growth across Greater Manchester" in line with Policy JP-J 1 (G7). The GMCA's own data shows that a better distribution of economic growth would be delivered by diversifying industry, not by doubling down on more of the same. As it stands, PFE will oversee a widening of the wealth gap between the North and South of the conurbation.

Employment Sites and Premises

The following policies are not sound on the grounds that when considered in conjunction they are not positively prepared:

- Policy JP-Strat 6 (Northern Areas)
- Policy JP-Strat 7 (North-East Growth Corridor)
- **Policy JP-J 2** (Employment Sites and Premises)
- JPA 1.1 (Heywood/Pilsworth)
- JPA 1.2 (Simister and Bowley)
- JPA 2 (Stakehill)
- High Crompton Broad Location

Reason

The North-East Growth Corridor may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway and Stakehill. It seems that this is being dictated not by actual need in the North of Greater Manchester but by the desire to outsource the demographic/geographic problems of the boroughs in the South of Greater Manchester. As such Oldham and especially Rochdale would be tying themselves to the economic needs of the southern boroughs.

The supply of such a large quantity of floor space (over 1 million sqm over the course of the plan and potentially 2 million sqm beyond the lifespan of the plan) in such a confined area is also a sub-optimal use of employment space. Storage and distribution facilities have a GEA employment density (sqm per FTE job) of almost double general industrial, and both compare unfavourably to the densities of office jobs. The low employment densities and low GVA of warehousing will lead to low levels of job creation (compared to employment zones of similar GEA) and low wealth creation (in comparison to the rest of the plan area).

Another issue is that storage and distribution is extremely susceptible to automation. In its employment land projections, PFE bases its projections on the assumption that the employment density of warehousing will not change, which is unlikely. The North-East Growth Corridor just bakes more unemployment into Oldham's and Rochdale's economic futures.

Modification

The following policy needs to be completely re-written to ensure that industry and employment in the North of the conurbation is diversified and delivers GVA growth in line with the rest of Greater Manchester.

- Policy JP-Strat 7 (North-East Growth Corridor)

The Northern Gateway should be turned into a reserved Broad Location for growth:

- JPA 1.1 (Heywood/Pilsworth)
- JPA 1.2 (Simister and Bowley)

The following allocation should be deleted:

- JPA 2 (Stakehill)

Acknowledgements

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Save Royton Greenbelt's campaign would not have been possible without the tireless efforts of Gary and Paul. Alongside Noel Mahon, Chairman of Save Royton's Greenbelt, they organized demonstrations, delivered thousands of leaflets and raised thousands of pounds.

Nobody has shaped my thinking in regards to this consultation response more than Mike Halley. Throughout our discussions (occasionally fractious but always illuminating) Mike encouraged me to see past the numbers and look at the underlying logic driving the Greater Manchester Spatial Framework. Mike also undertook considerable research into judicial reviews and his findings have been used to shape this response. It goes without saying this piece of work would have been very different and narrower in scope if it were not for Mike.

Thanks should also go to Yassamin (whose surname is unknown to me) who set up meetings between our team and Mayor Andy Burnham and the Greater Manchester Combined Authority. We also thank Stuart Vendy for accompanying us to these meetings, who gave us credibility and ensured we were taken seriously. We extend our appreciations to the Mayor, Anne Morgan of the GMCA, and also Councillor Sean Fielding, Leader of Oldham Council, for agreeing to meet with us.

We also thank the Save Greater Manchester Greenbelt team. There are a few individuals who deserve special mention, but I will resist doing so because somebody is always forgotten.

Lastly, and most importantly, we thank the people of Thornham and Royton who gave such fantastic support to the campaign. They turned out in their thousands on cold winter days to make their feelings known and generously donated thousands of pounds to support our efforts.