

Examination of Places for Everyone

Joint Development Plan Document

Inspectors: William Fieldhouse, Louise Gibbons and Steven Lee

Programme Officers: Yvonne Parker and Helen Wilson

Tel (Yvonne Parker): 07813334305

Tel (Helen Wilson): 07879443035

Email: info@programmeofficers.co.uk

Examination webpage: www.hwa.uk.com/projects/gmca/

IN8: Matters, Issues and Questions relating to legal, procedural and other general matters, and the Plan's spatial strategy

This note sets out some of the Matters, Issues and Questions that will help us decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is (**Annex 2**). Matters, Issues and Questions relating to other parts of the Plan will be set out in separate Inspector Notes.

The GMCA should submit written statements that respond to all of our Matters, Issues and Questions on behalf of the nine local planning authorities¹.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to their original representations made under regulation 20 in response to the consultation held between August and October 2021. Representors' statements should set out the key points from their original representation against the relevant questions, and not introduce new arguments or evidence.

Written statements must be prepared in accordance with the advice in **Annex 1**.

Written statements in response to the questions in this note must be emailed to the Programme Officers in PDF format by **midday on Thursday 8 September 2022**.

A further deadline will be set for statements in response to our other Matters, Issues and Questions when they are published. No written material will be accepted after the relevant deadline (unless it has been specifically requested by us).

¹ All references to "the GMCA" in this document, and by us throughout the examination, should be taken to refer to the nine local planning authorities where relevant in accordance with the provisions of section 28(1) and other parts the Planning and Compulsory Purchase Act 2004 (as amended).

Written statements will be published on the examination website as soon as possible after the deadline so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be circulated directly to participants. Anyone who is unable to access them on the website should contact the Programme Officers.

Where relevant, our Matters, Issues and Questions refer to the GMCA's proposed main modifications and other responses to our Preliminary Questions. We will take account of the GMCA's proposed main modifications, along with all of the published evidence, representations made in accordance with regulation 20, and written statements in coming to our conclusions at the end of the examination. However, we can only recommend main modifications if we decide that they are essential to make the Plan sound or legally compliant. We cannot recommend a modification because it would "improve" the Plan, irrespective of the wishes of the GMCA or anyone else.

Any queries about this note should be taken up with the Programme Officers.

William Fieldhouse Louise Gibbons Steven Lee

4 July 2022

Written statements

All written statements must be prepared in accordance with this advice.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to the representations that you made under regulation 20 (ie during the consultation held from 9 August to 3 October 2021). Statements should set out the key points from your representation against the relevant questions, and not introduce new arguments.

Statements should be concise and focussed, and in any event must contain no more than 3,000 words for each Matter.

The GMCA should produce a statement for every Matter on behalf of the nine local planning authorities. These should also be focused and succinct. However, because the GMCA has to answer every question, it may be necessary to exceed the limit of 3,000 words per Matter. In some cases, the GMCA's response to one of our Preliminary Questions may suffice as a response in which case that can be stated.

A separate statement must be submitted for each Matter that contains a question or questions that you wish to respond to. Each statement must:

- Include your name and Matter number in the top right corner of each page.
- Answer each question that you wish to respond to separately with clear reference to the relevant question number.
- Include a word count at the bottom of the final page.
- Have no appendices attached.

Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework 2021 ("NPPF") (paragraph numbers) and associated Planning Practice Guidance ("PPG") (eg ID:61-002-20190315) with an explanation of why you think the policy in question is consistent or inconsistent with it. Reference should also be made to specific parts of evidence in the examination library, including the GMCA submission and supporting documents and any documents submitted by representors with their regulation 20 representations. The document reference, title, page and paragraph number should be stated.

There is no need to quote extensive parts of the NPPF, PPG or evidence documents, although a brief extract or summary of key factual information from evidence in the examination library may be included if it is directly relevant to one of our questions.

Written statements are not the opportunity to introduce new evidence. If the GMCA or any representor considers that there is evidence that it is essential to refer to in order to answer one of our questions, but which is not in the examination library, please check with the Programme Officers before submitting it. If, exceptionally, we agree to accept additional evidence, for example because it has only become

available since the Plan was submitted and it is essential for us to consider, it would be added to the examination library.

If your response to any of our questions concludes that the relevant part of the Plan is not sound, your statement should set out how you think it should be modified to ensure that it is. Where relevant, refer to any proposed modifications or changes to the Policies Map that have been proposed by the GMCA.

End of IN8 Annex 1

Matters, Issues and Questions relating to legal, procedural and other general matters, and the Plan's spatial strategy²

Matter 1: legal, procedural and other general matters

Issue 1.1: Was the Plan prepared in accordance with relevant legal requirements?

Withdrawal of Stockport Metropolitan Borough Council from the Plan

The Introduction to the Places for Everyone Joint Development Plan Document ("the Plan") explains that work started in 2014 to produce a joint plan for the ten Greater Manchester local authorities: the Greater Manchester Spatial Framework (GMSF). Four consultations took place on the GMSF under regulation 18 between 2014 and 2019. The consultation responses in 2019 informed the preparation of GMSF 2020 which was intended to be published for consultation under regulation 19. However, Stockport Metropolitan Borough Council decided in December 2020 to not publish GMSF 2020 for consultation or submit it for examination.

The nine remaining local planning authorities resolved in February and March 2021 to establish a Joint Committee to continue to prepare a joint plan for the nine districts based on GMSF 2020. The Plan was subsequently published in August 2021 for consultation under regulation 19. The GMCA advised that the publication Plan included changes compared to GMSF 2020 that fell into five broad categories:

- As a direct result of the withdrawal of Stockport Council from GMSF.
- As a direct result of changes to government policy since October 2020.
- As a direct result of new evidence/information being made available since October 2020.
- Clarification of policy wording.
- Minor typographical changes.

Section 28 of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint development plan document. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has "substantially the same effect" on the remaining authorities as the original joint plan.

Section 20(2) of the 2004 Act states that an authority must not submit a development plan document for independent examination unless they have complied with any relevant requirements contained in regulations under Part 2 of the Act. It is clear from the Plan, and the submission and supporting documents, that the nine local planning authorities are satisfied that they complied with section 28 of the 2004 Act

² Further Matters, Issues and Questions relating to policies JP-Strat12 to JP-Strat14, the thematic policies in chapters 5-10 and 12, 38 allocated sites, and changes to the Green Belt will be set out in separate notes.

and regulation 32 of the 2012 Regulations. The GMCA's responses to PQ1 to PQ4 and FPQ3 clarify why the local planning authorities consider that the Plan has substantially the same effect as the original joint plan with regard to:

- The housing delivery figure for Manchester City Council in terms of the implications for development management and its future local plan.
- The omission of strategic allocations GMA11 Southwick Park, Manchester (20 dwellings) and GMA17 Hanging Chadder, Oldham (260 homes) that were included in GMSF 2020
- Changes to the detailed boundaries of the Green Belt and strategic allocations JPA2 Stakehill; JPA9 Walshaw; JPA15 Chew Brook Vale; JPA17 Coal Pit Lane; JPA27 Boothstown; and JPA28 Irlam Station compared to GMSF 2020.
- The amount of new industrial and warehouse floorspace proposed in policy JP-J4.

Q1.1. Does the Plan have substantially the same effect on the nine remaining local planning authorities as GMSF 2020?

Duty to cooperate

Section 33A of the 2004 Act sets out a duty to cooperate during the preparation of the Plan in relation to strategic matters³.

The Duty to Cooperate Statement and Log of Cooperation and Statement of Common Ground⁴ provide information about engagement with local planning authorities and prescribed bodies on strategic matters during the preparation of the Plan.

The GMCA's responses to PQ5 and PQ6 advise that the strategic matters addressed in the Plan are set out in paragraph 1.26, and summarise the main mechanisms that were used to engage with other local planning authorities and prescribed bodies to address those matters.

The GMCA response to PQ7 summarises the cross boundary strategic matters that needed to be addressed with Stockport Metropolitan Borough Council following the decision of that authority to withdraw from the joint plan in December 2020, and the specific steps that were taken to engage constructively and actively after that date up until the Plan was submitted for examination in February 2022.

The GMCA's response to PQ8 advises that no local planning authorities or prescribed bodies claim that the duty to cooperate has not been complied with.

Q1.2. Is there any substantive evidence to demonstrate that, during the preparation of the Plan, the nine local planning authorities failed to engage constructively,

³ A "strategic matter" is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter [section 33A(4) of the 2004 Act].

⁴ SD6 and SD7.

actively and on an ongoing basis with other local planning authorities and/or prescribed bodies in relation to strategic matters?

The GMCA's response to PQ9 advises that some strategic matters are subject to ongoing discussions with a number of local planning authorities and prescribed bodies following submission of the Plan for examination including St Helens Council, Stockport Council, Historic England, Natural England and National Highways. We will consider any soundness issues associated with those strategic matters under subsequent matters where relevant.

Local development schemes

Section 19(1) of the 2004 Act requires local plans to be prepared in accordance with the Local Development Scheme. Section 15 of the Act sets out that Local Development Schemes should specify the subject matter and geographical area to which a plan relates, as well as the timetable for preparation.

The GMCA's response to PQ10 advises that the Plan was carried out in accordance with the Local Development Schemes of each of the local planning authorities, both in terms of content and timescales.

Q1.3. Is there any substantive evidence which demonstrates the Plan was not prepared in accordance with the relevant Local Development Schemes?

Public consultation

Section 19(3) of the 2004 Act requires local planning authorities to prepare local development documents in accordance with their statement of community involvement. The summary of representations made during the regulation 19 consultation⁵ indicates that concerns were raised that a number of local planning authorities had failed to comply with their statement of community involvement (SCI).

The GMCA's responses to PQ11 and FPQ11 advise that specific concerns were raised about Bury, Oldham, Rochdale, Trafford and Wigan's consultation and whether they were in accordance with the relevant SCIs. The responses also set out what the specific concerns were, the activities that were carried out by the local planning authorities and how they relate to the relevant parts of their statements of community involvement.

Q1.4. Is there any substantive evidence to indicate that any of the local planning authorities failed to comply with their SCI during the preparation of the Plan?

Sustainability appraisal

Local planning authorities are required to carry out a sustainability appraisal during the preparation of local plans and prepare a report of its findings⁶.

⁵ Part LEG6 of submission document SD56 (Appendix C22 Other Issues Summary).

⁶ Sections 19(5) and 39 of the 2004 Act, and the *Environmental Assessment of Plans and Programmes Regulations 2004*

The GMCA carried out an “Integrated Assessment”, which includes sustainability appraisal, during the preparation of the Plan and published reports and addendums in 2020 and 2021⁷.

Q1.5. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?

Q1.6. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development?

Habitat Regulations Assessment

The GMCA carried out a Habitat Regulations Assessment (HRA) during the preparation of the Plan and published a report in February 2022⁸.

The GMCA response to PQ13 advises that Natural England has outstanding concerns about the HRA relating to the impacts of recreational disturbance and air quality on sites within the national site network⁹, including how these will be mitigated, and how the mitigation will be secured.

The GMCA response to FPQ13 indicates that the following work is being carried out to address Natural England’s concerns:

- Preparation of a Suitable Alternative Natural Greenspace and Strategic Access Management and Monitoring Strategy to mitigate recreation disturbance impacts on the South Pennines Moor Special Area of Conservation (including South Pennines Moor Phase 2 Special Protection Area and Peak District Moors Special Protection Area).
- Further assessment to find out if blanket bogs, transition mires and quaking bogs are present in the relevant parts of the South Pennines Moor Special Area of Conservation (including South Pennines Moor Phase 2 Special Protection Area and Peak District Moors Special Protection Area) along with the preparation of an air pollution mitigation strategy.
- Preparation of an air pollution mitigation strategy for the Rochdale Canal Special Area of Conservation.
- Completion of an air quality modelling study of new tree belts at Holcroft Moss Special Area of Conservation and the preparation of a mitigation strategy.

Each of the above pieces of work is expected to be completed in September 2022 (with draft reports available in July/August). GMCA anticipate that a statement of common ground will be agreed with Natural England following completion of the work in September 2022.

The GMCA response to FPQ13 advises that concerns about the HRA were also raised in representations by Save Greater Manchester’s Green Belt Group in 2021 at

⁷ SD8-SD17.

⁸ SD20

⁹ Special Areas of Conservation and Special Protection Areas in and close to Greater Manchester.

regulation 19 stage, and that those concerns were addressed in the updated HRA published in February 2022 and/or will be by the ongoing work referred to above.

We are likely to publish a question about the HRA and further work referred to above when we publish our matters, issues and questions about the Greener Places thematic policies. We may also publish a supplementary question when the further work and a statement of common ground with Natural England has been published, currently expected to be in September.

Superseded policies in existing local plans

Regulation 8(5) of the 2012 Regulations states that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. Appendix A seeks to meet this requirement. However, the tables do not identify the names of the relevant local plans and it is not made clear which parts of partially superseded policies are being replaced in all instances.

The GMCA response to PQ19 proposes a main modification to Appendix A to name the relevant existing local plans and specify which parts of partially superseded policies are being superseded. It also seeks to amend other elements of the schedule, including adding or removing policies from existing Plans.

Q1.7. Is the proposed main modification to Appendix A necessary to ensure the Plan is compliant with Regulation 8(5) of the 2012 Regulations, and would it be effective in that regard?

Equalities

Public authorities are required under section 149 of the Equality Act 2010 to have due regard to the following aims when exercising their functions:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
- b) advance equality of opportunity between persons who share a relevant protected characteristic¹⁰ and persons who do not share it
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

The GMCA response to PQ12 advises that an Equalities Impact Assessment was carried out as part of the Integrated Assessment. It also states that, while the assessment was based on the GMSF 2020, the Plan has substantially the same effect. It concludes that the thematic policies of the plan score either neutrally or positively with regard to protected characteristics and that no policies score negatively.

¹⁰ Age; disability; gender reassignment; marriage and civil partnerships; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

Q1.8. Is there any substantive evidence which demonstrates that the requirements of section 149 of the Equality Act 2010 have not been met?

Issue 1.2: Is the role of the Plan, and its proposed relationship with local plans and neighbourhood plans, legally compliant and consistent with national policy?

Paragraph 1.57 in the Plan makes clear that it is a strategic plan that does not cover everything that a district local plan would, and that districts will continue to produce their own local plans setting out more detailed policies. Paragraph 1.26 summarises what the Plan does as follows:

- sets out how the nine boroughs should develop up to the year 2037.
- identifies the amount of new development that will come forward in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused.
- identifies the important environmental assets which will be protected and enhanced.
- allocates sites for employment and housing outside of the urban area.
- supports the delivery of key infrastructure, such as transport and utilities.
- defines a new Green Belt boundary for the nine boroughs.

Tables 6.1, 6.2 and 7.1 summarise the “existing land” for office, industrial and warehouse, and housing developments as identified through land availability assessments. Paragraph 11.2 states that local plans will allocate sites from that supply as appropriate. Paragraph 11.5 explains that some additional development sites, outside the urban area, are required and that “the role of this Plan is to identify those sites, provide the policy context for their development and make the associated changes to the Green Belt”.

The GMCA responses to PQ18 and PQ28 confirm that, once the Plan is adopted:

- Local plans may contain strategic and non-strategic policies¹¹.
- Local plan policies will need to be consistent with policies in the Plan¹².
- All nine local planning authorities are intending to prepare local plans that are consistent with the Plan.
- Local plans will allocate sites from the “existing supply” as appropriate, and identify a sufficient supply of housing sites (in addition to the relevant allocations in the Plan) to ensure that the minimum delivery rates in their district set out in policy JP-H1 Table 7.2 can be achieved¹³.
- Neighbourhood plans will need to be in general conformity with the strategic policies in the Plan and any strategic policies in adopted local plans for the relevant area¹⁴.

It is our understanding, therefore, that it is not the intended role of the Plan to identify land to ensure that objectively assessed needs for housing and other uses can be met, as much of the supply will be brought forward through local plans. Nor is it the

¹¹ NPPF 17-23 and 28.

¹² Regulation 8(4).

¹³ NPPF 68.

¹⁴ NPPF 29 and footnote 18.

intended role of the Plan to address all strategic priorities in all districts, and local plans will be able to contain any strategic and non-strategic policies provided that they are consistent with the Plan and with national policy. Neighbourhood plans will be able to contain any non-strategic policies, provided that they are in general conformity with the strategic policies in the Plan and any strategic policies in adopted local plans for the relevant area.

Q1.9. Is the role of the Plan, and its relationship with local plans and neighbourhood plans, as described above, legally compliant and consistent with national policy? Does the Plan need to be modified to clarify its role in relation to local plans and neighbourhood plans?

Greater Manchester Strategy

We will consider whether policies JPA-Strat1 to JPA-Strat11 are justified and would be effective in providing a strategic framework for local plans and informing the preparation and determination of planning applications under a later matter. However, the GMCA response to PQ47 advises that the Plan is also the spatial expression of the Greater Manchester Strategy as it relates to the nine districts, and that policies JP-Strat1 to JP-Strat11 provide the overall spatial strategy which underpins Greater Manchester's wider investment and infrastructure decisions.

Paragraph 12.1 states that the Plan has a vital role in delivering the Greater Manchester Strategy, but many necessary actions lie outside its scope and will be taken forward through other strategies, plans and programmes. Paragraph 12.3 lists various delivery mechanisms that will be used by the local authorities, the Mayor and the GMCA in partnership with other agencies and organisations and the private sector.

Q1.10. Is it legally compliant and consistent with national policy for the Plan to set out the spatial expression of the Greater Manchester Strategy to underpin Greater Manchester's wider investment and infrastructure decisions?

Peak District National Park

The GMCA response to PQ44 proposes main modifications to paragraph 1.57 and various maps and illustrations in the Plan (and changes to the Policies Map) to clarify that part of Oldham Borough is within the Peak District National Park and that area is not subject to policies in the Plan but rather subject to development plan documents prepared by the Peak District National Park Authority.

Q1.11. Are the proposed main modifications, and changes to the Policies Map, relating to part of Oldham being in the Peak District National Park necessary to make the Plan sound and would they be effective in that regard?

Plan period

National policy advises that strategic policies should look ahead over a minimum 15-year period from adoption. The Plan will not be adopted until 2023 or later.

Q1.12. Is the plan period 2021 to 2037 justified, and will it provide an effective framework for local plans?

Matter 2: Amount of land needed for housing, office, and industrial and warehousing developments

Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, other than in certain circumstances defined in national policy¹⁵.

Issue 2.1: Does the Plan set out a housing requirement figure for the Plan area that is justified and consistent with national policy?

Strategic policy-making authorities should establish a housing requirement figure for their whole area. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals¹⁶.

The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

Circumstances where this may be appropriate include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth;
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

There may, occasionally, also be situations where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method.¹⁷

An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes¹⁸

¹⁵ NPPF 11b.

¹⁶ NPPF 61 and 66.

¹⁷ PPG ID:2a-010-20201216.

¹⁸ PPG ID:2a-024-20190220.

Policy JP-H1 states that a minimum of 164,880 net additional dwellings will be delivered over the period 2021-2037, or an annual average of around 10,305. Paragraph 7.4 explains that this figure has been derived using the standard methodology provided in national planning policy guidance for calculating local housing need.

The GMCA response to PQ22 advises that around 140,000 net additional dwellings were provided in the Plan area between 2001/02 and 2019/20 and that this represents an average annual rate of 7,370 net additional dwellings. The proposed average annual rate over the Plan period 2021 to 2037 of 10,305 would represent an increase of around 40% compared to the average annual rate between 2001 and 2020.

The GMCA response to PQ23 advises that levels of household growth higher than Local Housing Need were considered during the preparation of the Plan, as described in the Growth and Spatial Options Paper¹⁹.

Q2.1. Is the requirement to deliver a minimum of 164,800 net additional dwellings over the period 2021-2037 positively prepared, justified and consistent with national policy?

Issue 2.2: Are the amounts of industrial and warehousing and office development that the Plan identifies as being required positively prepared, justified and consistent with national policy?

The Employment Topic Paper indicates that the amount of additional floorspace for offices and industry and warehousing that the Plan identifies as being needed is based on the amount of development that took place between 2004 and 2020 with the addition of a “flexibility margin” of 31%. Employment forecasting was also undertaken, and this suggested similar future needs for offices, but significantly lower for industry and warehousing, compared to past trends²⁰.

Need for land for industrial and warehouse developments

Policy JP-J4 states that at least 3.33 million sqm of new, accessible industrial and warehousing floorspace will be provided in the Plan area over the period 2021-2037. Paragraph 6.32 refers to a range of industry and warehousing development opportunities having been identified that is capable of accommodating just over 1.9m sqm of floorspace. Paragraph 6.33 concludes that additional allocations are required to meet the overall requirement.

Q2.2. Is the requirement to provide at least 3.33 million sqm of new, accessible industrial and warehousing floorspace in the Plan area over the period 2021-2037. positively prepared, justified and consistent with national policy?

¹⁹ 02.01.10.

²⁰ 05.01.04 section 4.

Need for additional land for office developments

Policy JP-J3 states that at least 1.9 million sqm of accessible new office floorspace will be provided in the Plan area over the period 2021-2037. Paragraph 6.23 refers to opportunities to accommodate over 3.275 million sqm of office floorspace having been identified in strategic employment land availability assessments.

Q2.3. Is the requirement to provide at least 1.9 million sqm of new, accessible office floorspace in the Plan area over the period 2021-2037 positively prepared, justified and consistent with national policy?

Matter 3: Spatial strategy and methodology for selecting site allocations

Issue 3.1: Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives?

Spatial strategy

Paragraph 4.17 in the Plan states that the overall spatial strategy seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth. Paragraph 4.19 states that if forecast patterns of growth continue unchecked then Greater Manchester will become increasingly southward focussed with greater disparities between its northern and southern areas. The Plan seeks to boost significantly the competitiveness of the northern areas whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. Four elements to the spatial strategy are illustrated in Figure 4.1 and summarised in paragraph 4.21:

- Core growth area
- Inner area regeneration
- Boost northern competitiveness
- Sustain southern competitiveness

We will consider policies JP-Strat1 to JP-Strat 11, that relate to each of those four areas, under a subsequent matter. We will consider the proposed distribution of housing development between the nine districts set out in Table 7.2, and how it relates to the Plan's overall spatial strategy, under the next issue.

Q3.1. Is the overall spatial strategy aimed at achieving core growth and inner area regeneration, boosting northern competitiveness, and sustaining southern competitiveness an appropriate strategy, taking into account reasonable alternatives?

Housing distribution (Table 7.2)

We considered whether the total housing requirement of a minimum of 164,880 net additional dwellings between 2021 and 2037 (annual average around 10,305) is sound under matter 2, and we will consider various aspects of policy JP-H1 under a later matter. This issue is concerned with the spatial strategy as expressed by the proposed distribution of housing development between the nine districts (2021 to 2037) set out in Table 7.2

National guidance is clear that joint plans should be based on local housing need that is at least the sum of the local housing need for each local planning authority within the area, and that it will be for the relevant strategic policy-making authority to distribute the total housing requirement across the plan area²¹.

Table 7.2 sets out the proposed distribution of housing development across the Plan area between 2021 and 2037 by specifying minimum “delivery rate” figures for each district²².

Determining the housing distribution proposed in the Plan

Paragraphs 7.14 and 7.15 in the Plan provide reasoned justification for the proposed distribution of housing development in Table 7.2 with reference to projected demographic changes; inequalities between northern and southern parts of the Plan area; regeneration; economic success; access to public transport, employment and leisure opportunities; and the availability of suitable sites. In other words, the distribution seems to have been influenced by demographic trends, land supply, and Plan objectives.

The GMCA response to PQ24 advises that the proposed distribution of housing development reflects the overall spatial strategy and that the figures were derived from the application of the following “rules”²³ applied to the site selection process summarised in paragraph 5.7 of the Growth and Spatial Options Paper²⁴:

- all districts aim to meet at least 70% of their local housing need.
- no single district should exceed its local housing need by more than 125%.
- the northern districts should collectively meet around 100% of their collective local housing need.
- the southern districts should collectively meet a significant amount of their local housing need.

The Growth and Spatial Options Paper also refers to two further “rules” used in the site selection process:

- Each district was encouraged to meet their own local housing need.
- Where a single district has sufficient existing land supply to meet its own local housing need, and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt.

²¹ PPG ID:21-013.

²² The GMCA response to PQ25 proposes a main modification to policy JP-H1 to clarify that those “delivery rates” are the minimum number of net additional dwellings that each district is expected to identify a sufficient supply of sites for in their local plans. We will consider that proposed modification, and other aspects of policy JP-H1, under a later matter.

²³ The “rules” are also sometimes referred to by GMCA as “principles”.

²⁴ 02.01.10.

Q3.2. Is the proposed distribution of housing development between districts (2021-2037) in Table 7.2 based on adequate and proportionate evidence?

Housing distribution and spatial strategy

The GMCA response to PQ21 includes a table intended to illustrate how the housing delivery rates set out in Table 7.2 achieve the six “rules” referred to above. Amongst other things, the table in response to PQ21 seems to indicate:

- The housing requirement figures for Bolton, Manchester and Oldham are the same as their local housing need.
- The housing requirement figures for Bury (76%), Tameside (74%) and Trafford (81%) are below their local housing need.
- The housing requirement figures for Rochdale (122%), Salford (125%) and Wigan (111%) are above their local housing need.

The GMCA response FPQ26 provides the following indicative figures for each of the strategic areas referred to in Figure 4.1 and policies JP-Strat1, JP-Strat5, JP-Strat6 and JP-Strat9:

	Local housing need	Table 7.2 minimum requirement ²⁵	Table 7.1 Total supply
• Core Growth Area ²⁶	8,273	61,942	70,302
• Inner Areas ²⁷	43,644	25,303	29,724
• Northern Areas ²⁸	73,903	67,142	78,897
• Southern Areas ²⁹	39,060	10,495	11,829
• Total	164,880	164,882	190,752

Q3.3. Is the proposed distribution of housing development between districts (2021 to 2037) in Table 7.2 consistent with the spatial strategy summarised in Figure 4.1 and paragraphs 4.17 to 4.19 and detailed in policies JP-Strat1 to JP-Strat11? In particular:

- a) Will the minimum housing requirement figures in Table 7.2 for Manchester, Salford and Trafford collectively help to deliver core growth and inner area regeneration?
- b) Will the minimum housing requirement figures in Table 7.2 for Manchester and Trafford collectively help to sustain southern competitiveness?
- c) Will the minimum housing requirement figures in Table 7.2 for Bolton, Bury, Oldham, Rochdale, Salford, Tameside and Wigan collectively help to boost northern competitiveness?

²⁵ These minimum requirement (delivery rate) figures were provided by GMCA in response to FPQ26, which differ from those provided in response to PQ26 to reflect the geographical boundaries used to determine the other figures provided in response to FPQ26. In the interests of consistency, we will use the FPQ26 figures.

²⁶ Central Manchester, south-east Salford, and north Trafford.

²⁷ Surrounding inner parts of Manchester, Salford and Trafford.

²⁸ Bolton, Bury, Oldham, Rochdale, Tameside, Wigan, and west Salford.

²⁹ Most of Trafford and south Manchester.

Housing distribution and housing market areas

The Housebuilding Consortium's representation advises that Greater Manchester is not a single housing market area and refers to the Greater Manchester Strategic Housing Market Assessment 2008 which identified four housing market areas. The GMCA response to SPQ26 advises that, based on the figures in Table 7.2 in the Plan, the minimum housing requirement figures in those four housing market areas are estimated to be as follows³⁰:

- | | |
|--|---------|
| • Central: Manchester, Salford and Trafford | 81,029 |
| • Southern: Manchester, Stockport and Trafford | 14,508 |
| • North Eastern: Tameside, Oldham and Rochdale | 29,309 |
| • North Western: Bolton, Bury, Salford, Wigan | 40,035 |
| • Total | 164,881 |

Q3.4. Would the proposed distribution of housing development help to ensure that sufficient land will be available in the right places to meet the housing needs of present and future generations³¹?

Issue 3.2 Were the allocations in the Plan selected using an appropriate methodology based on proportionate evidence?

Paragraph 11.5 in the Plan explains that, having taken account of the existing supply of land for housing, offices, and industry and warehousing, some additional development sites outside the urban area are required. 38 sites are allocated in the Plan: 23 for housing, 9 for employment, and 6 for a mix of housing and employment development.

Paragraph 11.6 advises that the allocations in the Plan reflect the spatial strategy set out in chapter 4 and aim to make the most of existing locations and assets whilst providing opportunities across the Plan area that help address current disparities.

The Site Selection Background Paper³² describes the four stage process that was used to select the 38 allocations in the Plan:

- Consider opportunities on Protected Open Land and Safeguarded Land
- Identify Areas of Search in line with seven site selection criteria and associated considerations (Table 1).
- Assess planning constraints and site suitability for all "call for sites" in the Areas of Search, having regard to six principles aimed at ensuring the spatial strategy and Plan objectives were met.
- Further analysis of sites within preferred Areas of Search based on more detailed evidence about planning constraints, Green Belt harm, and masterplanning.

Paragraph 6.42 advises that a total of 115 Areas of Search were identified containing 400 sites in 2016 and approximately 30 more sites that fell within Areas of Search

³⁰ The estimates include proportions of the districts Table 7.2 requirement figures based on the proportions of existing supply in the relevant housing market areas defined in the 2008 assessment.

³¹ NPPF 8.

³² 03.04.01.

were assessed following the GMSF 2019 stage. Sites that fall outside the Areas of Search were not considered further as they were not deemed to be reasonable alternatives for meeting the overall vision, strategy and objectives.

The Council's responses to PQ20 summarises the key findings of site selection methodology for each of the allocations in the Plan, along with the overall findings of the viability assessments.

Housing allocations

Paragraph 11.8 advises that the housing allocations in the Plan provide an opportunity to widen housing choice within districts, including the provision of affordable housing as well as larger and higher value homes in those areas currently lacking such housing.

Q3.5. Were the housing allocations in the Plan (including the relevant parts of mixed use allocations) selected using an appropriate methodology based on proportionate evidence³³?

Q3.6. Are the locations of the housing allocations in the Plan (including the relevant parts of mixed use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?

Employment allocations

Paragraph 11.7 in the Plan advises that the employment allocations were selected based on their location and the opportunity they provide to address some of the economic disparities in the conurbation. Some allocations are of a scale that is nationally or globally significant in terms of attracting new businesses.

Q3.7. Were the employment allocations in the Plan (including the relevant parts of mixed-use allocations) selected using an appropriate methodology based on proportionate evidence³⁴?

Q3.8. Are the locations of the employment allocations in the Plan (including the relevant parts of mixed-use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?

Issue 3.3 Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?

National Highways regulation 19 representation (1 October 2021) advised that they and their consultants WSP were working with Transport for Greater Manchester and

³³ We consider the evidence about the impact of allocations on the strategic road network under the next issue.

³⁴ We consider the evidence about the impact of allocations on the strategic road network under the next issue

SYSTRA to support ongoing work known as “Highways England Future Work Programme”. National Highways stated that they considered that work to be of critical importance to understanding the impacts of the Plan on the strategic road network (“SRN”).

The GMCA responses to PQ9 and PQ43 referred to a draft SRN report³⁵ being shared with National Highways on 3 May 2022. The GMCA response to FPQ43 indicates that they expect:

- a) to receive a response from National Highways to the draft SRN report by 29 July 2022;
- b) that all further work relating to the impact of development on the strategic road network will be in support of planning applications rather than in relation to the Plan, but this will be confirmed by National Highways once it has completed its review of the draft SRN report on 29th July; and
- c) to agree a statement of common ground with National Highways (that addresses the issue of whether or not the Plan will have an unacceptable impact on highway safety or the residual cumulative impacts on the strategic road network would be severe) by 8 September 2022.

We may ask a supplementary question relating to this issue when we have considered National Highways review of the draft SRN report and statement of common ground referred to above.

Q3.9. Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?

Q3.10. Is there substantive evidence to indicate that the development proposed in the Plan, in combination with other committed and planned development, would have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would be severe? In particular:

- a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?
- b) Does the Plan include effective policies to secure the necessary mitigations?

Matter 4. Green Belt

Background

The Greater Manchester Green Belt was originally designated in full in 1984 and was subsequently subject to a series of minor changes through individual districts’ local plans³⁶. Almost half of the Plan area is currently designated Green Belt in adopted local plans³⁷.

³⁵ SRN Future Work Programme – Draft Final Technical Report

³⁶ Plan paragraph 8.54.

³⁷ Plan paragraph 1.51.

The GMCA response to PQ31 advises that a total of 2,430 hectares is removed from the Green Belt in the Plan to facilitate the allocation of the sites proposed in chapter 11. All but 4 of the 38 allocations in the Plan are currently wholly or partially in the Green Belt.

National policy advises that the essential characteristics of Green Belts are their openness and their permanence. Therefore, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans.

As all of the sites removed from the Green Belt are proposed for development, all would become less open to varying degrees if the Plan were to be implemented. This matter is concerned with the strategic reasons why the Plan removes land from the Green Belt. We will consider site specific issues related to each allocation, including the impacts on Green Belt purposes, the proposed Green Belt boundaries and proposals for compensatory improvements to remaining Green Belt, under a subsequent matter. We will reach conclusions on whether there are exceptional circumstances to justify removing each of the sites from the Green Belt following all of those considerations.

Issue 4.1 Were all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined?

Land within existing urban areas

Figure 6.2 in the Plan indicates that, without the allocations in the Plan, there is capacity for around 1.8 million sqm of new industrial and warehousing floorspace on land identified in the employment land availability assessments for the period 2021 to 2037³⁸. This compares to the identified requirement for 3.3 million sqm.

Table 7.1 indicates that, without the allocations in the Plan, there is capacity for around 170,385 new homes on land identified in the strategic housing land availability assessment for the period 2021 to 2037³⁹. This compares to the identified requirement for a minimum of 164,800 net additional dwellings.

Paragraph 1.41 states that each of the districts has looked to maximise the contribution of brownfield land by applying higher densities in the most accessible locations, reviewing the employment land supply, and seeking to identify more opportunities in town centres.

Paragraph 1.42 states that, between 2021 and 2037, around 90% of housing, 99% of offices, and 47% of industrial and warehousing development will be within the urban area.

Q4.1. Were all reasonable opportunities for meeting the need for (a) housing and (b) industrial and warehousing development within the existing urban areas fully

³⁸ 3,960,389 – 2,154,880 = 1,805,509.

³⁹ 190,752 – 20,367 = 170,385.

examined, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

Safeguarded land and protected open land

The Site Selection Background Paper indicates that stage one of the site selection process (for land outside urban areas) considered opportunities on protected open land and safeguarded land. Paragraph 6.12 of the Paper states that the approach taken in the Plan to protected open land and safeguarded land varies depending on the policy in the relevant adopted local plan. If the relevant policy allows development of the land within the current plan period, and it has been considered appropriate in principle for development, it has been included within the baseline housing land supply. However, where development would be contrary to an adopted local plan policy, the sites are brought forward for development in the Plan. The Plan includes five allocations on protected open land or safeguarded land⁴⁰.

The GMCA response to PQ34 advises that there is no protected open land or safeguarded land in the adopted local plans for Manchester, Salford or Tameside. The other districts have the following quantities of protected open land or safeguarded land in their adopted local plans:

- Bolton 736 ha
- Bury 30 ha
- Oldham 317 ha
- Rochdale 627 ha
- Trafford 147 ha
- Wigan 680 ha

The response to PQ34 includes information about each of the 96 individual areas of protected open land and safeguarded land in the adopted local plans. It indicates that all of that land (that is not allocated in the Plan) is either now developed; included in the existing land supply in Table 7.1 (total around 910 ha); or not considered to be available or suitable for development. Some of the land has been added to the Green Belt in the Plan.

The GMCA response to PQ35 identifies a limited number of non-Green Belt sites (some protected open land or safeguarded land, some within urban areas) that representors consider suitable for development that are not allocated in the Plan. The response explains why each site is not allocated in the Plan.

Q4.2. Were all reasonable opportunities for meeting the need for housing and industrial and warehousing development on existing safeguarded land and protected open land fully examined?

Neighbouring authorities

⁴⁰ JPA16 Cowlshaw; JPA24 Roch Valley; JPA25 Trows Farm; JPA33 New Carrington (part); and JPA36 Pocket Nook.

The Duty to Cooperate Statement of Common Ground 2022 advises that during the preparation of the Plan neighbouring authorities outside Greater Manchester responsible for local plan preparation were asked if they could accommodate any of Greater Manchester's housing or employment development needs. The responses indicate that no neighbouring authority could accommodate Greater Manchester's development needs, and that a number of neighbouring authorities have either released or are proposing Green Belt release to accommodate their own growth requirements⁴¹.

Q4.3. Is there any substantive evidence to indicate that relevant neighbouring local planning authorities outside the Plan area could accommodate some of the housing or industrial and warehousing development identified as being needed?

Issue 4.2 Is removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development?

The spatial strategy and methodology for selecting the allocations in the Plan were considered under matter 3. Site specific issues related to each allocation, including in relation to Green Belt purposes, the new Green Belt boundaries, and compensatory improvements to the environmental quality and accessibility of remaining Green Belt, will be considered under subsequent a matter.

Sustainable patterns of development

National policy advises that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport.

Q4.4. In selecting the allocations that are removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

Removing land from the Green Belt to provide land for housing development

The Plan identifies an existing land supply (without allocations in the Plan) sufficient to accommodate over 170,000 new homes between 2021 and 2037⁴². This compares to the requirement in the Plan to deliver at least 164,880 net additional dwellings. Paragraph 7.12 states that the land supply needs to be sufficiently flexible and deliver balanced and inclusive growth to achieve the overall spatial strategy meaning that there is a need for additional new sites some of which are currently in the Green Belt.

⁴¹ SD7 paragraphs 10.14 and 11.14.

⁴² Table 7.1: 190,752 minus 20,367 (Plan allocations) = 170,385.

Q4.5. Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 164,880 net additional homes in the period 2021 to 2037?

The Plan removes land from the Green Belt to allocate sites for new homes in each of the nine districts apart from Bolton and Manchester. The GMCA response to PQ21 indicates the existing housing land supply in each of the other seven districts as a proportion of local housing need:

- Bury 41%
- Oldham 98%
- Rochdale 92%
- Salford 163%
- Tameside 64%
- Trafford 72%
- Wigan 123%

Notwithstanding the existing land supply being more than sufficient to meet local housing need in both districts, the Plan removes around 75 hectares from the Green Belt in Salford to allocate three sites for a total of 1,500 dwellings⁴³, and around 106 hectares from the Green Belt in Wigan to allocate two sites for a total of 1,600 dwellings⁴⁴.

The GMCA response to PQ36 explains that the three allocations in Salford are in west Salford which is part of the northern area as defined in paragraph 4.21. The 1,500 dwellings on those three allocations therefore help to ensure that the northern areas collectively meet around 100% of their local housing need as well as adding to the residential offer in Salford in terms of mix, type, quality and range.

The GMCA response to PQ36 advises that the 1,600 homes on the two allocations in Wigan are needed to meet a housing requirement figure in excess of local housing need, and to meet qualitative need in the borough and wider sub region through providing highly quality residential neighbourhoods.

Q4.6. Is there a need to remove land from the Green Belt in each of the seven districts to ensure that the identified need for new homes can be met in accordance with the Plan's spatial strategy? In particular, is there a need to remove land from the Green Belt in Salford and Wigan to meet housing needs?

Removing land from the Green Belt to make employment allocations

The Plan removes land from the Green Belt to allocate sites for employment development in each of the nine districts.

Policy JP-J2 (employment sites and premises) states that a strong portfolio of prime investment opportunities for new floorspace will be brought forward in the key locations identified in policy JP-J1 including (through) the selective removal of land

⁴³ JPA26, JPA27 and JPA28.

⁴⁴ JPA35 and JPA37 (partly allocated for employment development).

from the Green Belt. Policy JP-J4 identifies a need for land to accommodate at least 3.33m sqm of new industrial and warehousing floorspace⁴⁵, and paragraph 6.32 refers to an existing supply of land for just over 1.9m sqm of floorspace. Paragraph 6.33 states the only realistic option to meet the overall need is to remove some land from the Green Belt.

The Plan allocates 15 sites wholly or partly for employment development. Table 6.2 identifies a total of nearly 2.2m sqm of new industrial and warehouse floorspace on the site allocations in the Plan, and a total supply of nearly 4m sqm for the period 2021-2037.

Q4.7. Is there a need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met between 2021 and 2037?

Q4.8. Will the employment allocations removed from the Green Belt promote sustainable patterns of development?

Matter 5 Key Diagram and policies JP-Strat1 to JP-Strat11⁴⁶

Issue 5.1 Does the Key Diagram (Figure 3.1) effectively illustrate the spatial strategy and indicate the broad locations for development proposed in the Plan?

The Plan's Key Diagram (Figure 3.1) indicates elements of the spatial strategy set out in policies JP-Strat1 to JP-Strat11, principal town centres, Green Belt, strategic allocations, strategic locations, a broad location, potential rapid transit routes, HS2 route, and existing rapid transit routes and motorways, all in relation to the built up areas.

The GMCA response to PQ45 advises that the three "strategic locations" shown on the Key Diagram are the North East Growth Corridor (JP-Strat 7), the Wigan Bolton Growth Corridor (JP-Strat 8), and Manchester Airport (JP-Strat 10).

The GMCA response to PQ45 advises that the "potential rapid transit" routes shown on the Key Diagram are extracted from the 2040 Transport Strategy and Five Year Delivery Plan⁴⁷. The routes are long term aspirations, and are not critical to realise opportunities for large scale development proposed in the Plan.

⁴⁵ The requirement for 3.33m sqm of floorspace includes a 31% flexibility allowance.

⁴⁶ Policies JP-Strat12 to JP-Strat14 relate to town centres, green infrastructure, and the transport network. We will consider those policies under a subsequent matter alongside the relevant thematic policies in chapters 8, 9 and 10 of the Plan.

⁴⁷ 09.01.01 and 09.01.02.

The GMCA response to PQ46 advises that the “principal town centres” shown on the key diagram are the same as ones referred to in policy JP-Strat12 and the City and Main town centres listed in JP-P4. Policy JP-P4 refers to “City Centre (within Manchester and Salford)” and seven “main town centres”.

Q5.1 (a) Does the Key Diagram (Figure 3.1) effectively illustrate the spatial strategy and indicate the broad locations for development proposed in the Plan? (b) Does the notation panel need to be modified to use terminology consistent with policies in the Plan and/or to refer to relevant policies?

Issue 5.2 Are the diagrammatic maps (Figures 4.2 to 4.8 and Picture 4.8) justified, and do they help to ensure that policies JP-Strat1 to JP-Strat11 can be effectively applied?

Figures 4.2 to 4.8 and Picture 4.8 consist of diagrammatic maps associated with some of the spatially specific strategic policies in Chapter 4 of the Plan relating to the Core Growth Area, Inner Areas, Northern Areas and Southern Areas. Some of those maps indicate improvements to transport infrastructure, including extensions to the Metrolink, new rail and Metrolink stations, tram-train routes, bus rapid transit routes, and new and improved roads.

The GMCA responses to PQ51, PQ53, PQ59, PQ62, PQ65 and PQ70 advise that the transport infrastructure improvements indicated on those maps are not critical to realise opportunities for large scale development proposed in the Plan⁴⁸ and that the maps are for illustrative purposes only. The transport improvements are selected from the 2040 Transport Strategy and Five Year Delivery Plan which set out the interventions and policies important to improving the transport network across Greater Manchester.

Q5.2. (a) Is the content of Figures 4.2 to 4.8 and Picture 4.8 justified? (b) Do those diagrammatic maps help to ensure that policies JP-Strat1 to JP-Strat11 can be effectively applied? (c) Should the Plan be modified to clarify the purpose of the diagrammatic maps and the status of the transport infrastructure improvements that are shown?

Issue 5.3 Is the purpose and nature of policies JP-Strat1 to JP-Strat11 clear such that they will be effective?

Policies JP-Strat1 to JP-Strat11 relate to different geographical areas⁴⁹. The GMCA response to PQ47 advises that the intended purpose of those policies is to provide a strategic justification for the site allocations in chapter 11 of the Plan; to provide a strategic framework for local plans; and to set out clearly written and unambiguous policies to inform the preparation and determination of planning applications. The response also states they have a role in expressing and underpinning Greater

⁴⁸ NPPF 106c.

⁴⁹ Policies JP-Strat12 to JP-Strat14 relate to town centres, green infrastructure, and the transport network. We will consider those policies under a subsequent matter alongside the relevant thematic policies in chapters 8, 9 and 10 of the Plan.

Manchester's wider investment and infrastructure decisions, which we considered under matter 1.

Q5.3. Are policies JP-Strat1 to JP-Strat11 clearly written and unambiguous such that they will be effective in terms of (a) providing a strategic framework for local plans and/or (b) informing the preparation and determination of planning applications?

Issue 5.4 Are policies JP-Strat1 to JP-Strat4 relating to the Core Growth Area justified and effective?

Paragraphs 4.21 defines the Core Growth Area as central Manchester, southeast Salford and north Trafford. Paragraph 4.23 refers to the huge agglomeration of economic activity at the centre of Greater Manchester as perhaps being the city region's greatest strength and the city centre being the largest office market in the country outside London.

Policies JP-J1 and JP-J3 refer to some locations identified in policies JP-Strat1-4. Where relevant, and to avoid duplication, we have also included reference to these policies in our questions below. Additional questions relating to these policies will be set out in later matters.

Policy JP-Strat1 Core Growth Area

Policy JP-Strat1 states that the economic role of the Core Growth Area will be protected and enhanced; that there will be a significant increase in the number and range of new homes; and that infrastructure will support the growth. Policy JP-J1 part G(iii) identifies an area stretching from the Etihad Campus in the east, through the City Centre and the Quays to Trafford Park and the Trafford Centre as one of the key locations that will maximise economic growth.

The GMCA response to PQ48 advises that the figure of 98,000 homes identified in policy JP-Strat1 is not intended to be a requirement for local plans. It proposes main modifications to delete references to the housing supply in the policy and move them to the reasoned justification. It also advises that the figure of 98,000 dwellings referred to in the policy is an error and should be 69,000 new homes.

Q5.4. Are policies policy JP-Strat1 and JP-J1 part G(iii) sound? In particular:

- a) Are policies JP-Strat1 and JP-J1 part G(iii) justified and effective in protecting and enhancing the economic role of the "Core Growth Area" while also promoting significant increase in the number and range of homes?
- b) Are policies JP-Strat1 and JP-J1 part G(iii) clearly written, such that they would provide an effective strategic framework for local plans and an unambiguous policies to inform the preparation and determination of planning applications?
- c) Is it necessary for soundness to delete reference in policy JP-Strat1 to 98,000 dwellings and to insert reference in the reasoned justification to 69,000 homes?

Policy JP-Strat2 - City Centre

Policy JP-Strat2 states that the role of the City Centre as the most significant economic location outside London will be strengthened considerably. Policy JP-J1 part G(i) identifies the City Centre as a key location that will help maximise economic growth. It also specifically highlights the Oxford Road corridor will continue to develop as a world-class innovation hub. Policy JP-J3 part 1 identifies the City Centre as an area which should be a focus for office development.

The GMCA response to PQ49 advises that the supply figures of around 2,200,000 sqm of office floorspace, around 56,000 new dwellings and minimal industry and warehousing (just over 35,000sqm) are not intended to be requirements for local plans. It also proposes main modifications to delete references to the housing and employment supply in the policy and move them to the reasoned justification.

Q5.5. Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 sound? In particular:

- a) Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 justified and effective in seeking to strengthen the economic role, including as a focus for office and innovation-based development, of the “City Centre” while also expanding the area’s residential role?
- b) Are policies JP-Strat2, JP-J1 part G(i) and JP-J3 part 1 clearly written, so that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?
- c) Is it necessary for soundness to delete reference in policy JP-Strat2 to 2,200,000 sqm of office floorspace, 56,000 new dwellings and minimal industry and warehousing (35,000 sqm) and insert these figures into the reasoned justification?

Policy JP-Strat3 - The Quays

Policy JP-Strat3 states that The Quays will continue to develop as an economic location of national significance, characterised by a wide mix of uses. Policy JP-J1 part G(ii) identifies The Quays as a key location that will help maximise economic growth. Policy JP-J3 part 2 also identifies The Quays as an area that should be a focus for office development.

The GMCA response to PQ50 advises that the supply figures of 12,500 new dwellings, 192,000 sqm of office floorspace and around 6,000 sqm of industry and warehousing are not intended to be requirements to be met in local plans. Main modifications are also proposed to delete these references from the policy and move them to the reasoned justification.

Q5.6. Are policies JP-Strat3, JP-J1 part G(ii) and JP-J3 part 2 sound? In particular:

- a) Is “The Quays” a suitable location for nationally significant economic activity, including being a focus for office space, and expansion of its residential, leisure and tourism roles?
- b) Are policies JP-Strat3, JP-J1 part G(ii) and JP-J3 part 2 clearly written, such that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?

c) Is it necessary for soundness to delete reference in policy Strat3 to 12,500 new dwellings, 192,000 sqm of office floorspace and around 6,000 sqm of industry and warehousing and insert these figures into the reasoned justification?

Policy JP-Strat4 Port Salford

Policy JP-Strat4 states that Port Salford will be developed as an integrated tri-modal facility with on-site canal berths, rail spur and container terminal as essential elements of the scheme. Policy JP-J1 part G(vi) identifies Port Salford as a key location for maximising economic growth.

The GMCA response to PQ52 advises that the reference to 500,000 sqm of employment floorspace refers to the anticipated delivery from allocation JPA29, existing commitments and development that has already taken place in the Port Salford area. This amounts to around 150,000 sqm. Policy JPA29 allocates land for the delivery of around 320,000 sqm of employment floorspace. Accordingly, the total floorspace committed or proposed by JPA29 is 470,000 sqm. The response to PQ52 advises that the remaining 30,000 sqm provides flexibility. We will specifically consider JPA29 under a later matter.

Q5.7. Are policies JP-Strat4 and JP-J1 part G(vi) sound? In particular:

- a) Are policies JP-Strat4 and JP-J1 part G(vi) justified in identifying Port Stratford as a suitable location for a tri-modal facility that will deliver 500,000 sqm of employment floorspace?
- b) Given the scale of existing commitments and the requirements of policy JPA29, how is it anticipated the 500,000 sqm of employment floorspace will be delivered?
- c) Are policy JP-Strat4 and JP-J1 part G(vi) otherwise clearly written, such that they would provide an effective strategic framework for local plans and unambiguous policies to inform the preparation and determination of planning applications?

Issue 5.5 Is policy JP-Strat5 relating to Inner Area Regeneration justified and effective?

Policy JP-Strat5 Inner Areas

Policy JP-Strat5 states that the continued regeneration of the inner areas will be promoted and that high levels of well-designed new development will be accommodated.

The GMCA response to PQ55 advises that the reference to 270,000 sqm of office, 132,000 sqm of industry and warehousing and 30,000 new dwellings are not intended to be requirements for local plans. It also proposes main modifications to delete these references from the policy and move them to reasoned justification.

Paragraph 4.21 defines the Inner Area as surrounding inner parts of Manchester, Salford and Trafford. Paragraph 4.39 refers to 22 wards being 'at the heart' of the inner area. Footnote 12 lists these wards. The GMCA response to PQ54 advises that the 22 wards referred to do not constitute the full extent of the 'inner areas'.

Q5.8. Is policy JP-Strat5 sound? In particular:

- a) Are the “inner areas” a suitable location for “high levels of well-designed new development”, comprising a mix of housing and necessary supporting infrastructure?
- b) Would it be clear to decision makers which area of Greater Manchester the policy applies to and would the Plan be effective in this regard?
- c) Is it necessary for soundness to delete reference in the policy to 270,000 sqm of office, 132,000 sqm of industry and warehousing and 30,000 new dwellings and insert these references into the reasoned justification?
- d) Is policy JP-Strat5 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

Issue 5.6 Are policies JP-Strat6 to JP-Strat8 relating to the Boosting Northern Competitiveness justified and effective?

Policy JP-Strat6 Northern Areas

Paragraph 4.21 defines the northern areas as Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford.

Policy JP-Strat6 states that a significant increase in the competitiveness of the northern areas will be sought complemented by improvements to transport connectivity. The GMCA response to PQ56 proposes a modification to clarify that the reference to “the selective release of Green Belt and previously safeguarded land in key locations” relates to the allocations made in the Plan, rather than a proposal to be implemented through future local plans

Q5.9. Is policy JP-Strat6 sound: In particular:

- a) Is policy JP-Strat6 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?
- b) Is the proposed modification relating to selective release of Green Belt and safeguarded land necessary to ensure soundness and would it be effective in that regard?

Policy JP-Strat7 North East Growth Corridor

Paragraph 4.49 advises that the most significant proposed intervention in the northern areas is focused on the M62 corridor from junction 18 (M60/M66) to junction 21 (Milnrow), extending across parts of Bury, Rochdale and Oldham. Policy JP-Strat7 refers to a nationally significant area of economic activity which will be supported by a significant increase in the residential offer. Policy JP-J1 part G(vii) refers to the Northern Gateway and a massive expansion of the existing employment areas helping to deliver a better distribution of growth across Greater Manchester and boosting the economy of the northern part of the city region.

Three of the Plan's allocations are in the north east growth corridor:

- JPA1.1 Heywood / Pilsworth (Northern Gateway), Bury / Rochdale
- JPA1.2 Simister and Bowlee (Northern Gateway), Bury / Rochdale
- JPA2 Stakehill, Oldham / Rochdale

The GMCA response to PQ57 advises that the references in policy JP-Strat7 to land for almost one million sqm of new employment floorspace and around 19,000 new dwellings in the North East Growth Corridor reflects the capacity of the existing land supply and allocations in the Plan. The figures are not intended to be requirements to be met in local plans. Main modifications are proposed to delete these references from the policy and include figures in the reasoned justification. The response advises that the figure of around 19,000 dwellings should in fact be around 16,000

The penultimate paragraph of policy JP-Strat7 refers to the "High Crompton Broad Location ... a potential opportunity for further expansion of the economic and residential offer in the eastern most part of this key gateway location". The policy goes on to state that "the land will remain in the Green Belt until such time that a review of this Plan and / or the Oldham Local Plan can demonstrate that it is necessary". The broad location is indicated on the key diagram and picture 4.2.

The GMCA response to PQ58 advises that the purpose of those references is to signal a possible location for future development which would be broadly in line with the spatial strategy in the Plan but that removal of the land from the Green Belt in the future would need to be justified, including in terms of demonstrating exceptional circumstances. The response proposes a main modification to paragraph 4.49 to refer to the High Crompton Broad Location.

Q5.10. Is policy JP-Strat7 sound? In particular:

- a) Is the "North East Growth Corridor" (as indicated on Picture 4.2) a suitable location for nationally-significant economic activity and a significant increase in residential development?
- b) Is it necessary for soundness to delete reference in the policy to one million sqm of floorspace and 19,000 dwellings and to insert reference in the reasoned justification to one million sqm of floorspace and 16,000 dwellings?
- c) Is the policy relating to the High Crompton Broad Location justified and consistent with national policy? Would the proposed modification to paragraph 4.49 provide adequate reasoned justification for the High Crompton Broad Location?
- d) Is policy JP-Strat7 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

Policy JP-Strat8 Wigan Bolton Growth Corridor

Paragraph 4.54 indicates that the Wigan-Bolton Growth Corridor is located in the north-west of Greater Manchester. Policy JP-Strat8 refers to a regionally significant area of economic and residential development. Policy JP-J1 part G(viii) identifies the M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) as providing a major cluster of warehousing and distribution activity along the M6 corridor.

Five of the Plan's allocations are in the Wigan Bolton growth corridor:

- JPA4 Bewshill Farm
- JPA5 Chequerbent North
- JPA6 West of Wingates/M61 Junction 6
- JPA34 M6 Junction 25
- JPA35 West of Gibfield

The third paragraph of policy JP-Strat8 states that land to accommodate over one million sqm of new employment floorspace and around 13,000 new dwellings has been identified in the Wigan-Bolton Corridor.

The GMCA response to PQ60 advises that the references in policy JP-Strat8 to land for over million sqm of new employment floorspace and around 13,000 new dwellings in the Wigan-Bolton Corridor reflects the capacity of the existing land supply and allocations in the Plan. The figures are not intended to be requirements to be met in local plans. Main modifications are proposed to delete these references from the policy and include figures in the reasoned justification.

The penultimate paragraph of policy JP-Strat8 refers to supporting the restoration of Hulton Park, and the provision of a Ryder Cup standard golf course and associated leisure and tourism facilities, and the development of land at Royal Bolton Hospital, including a health village. The GMCA response to PQ61 indicates that these have a role to play in the wider conurbation.

Q5.11. Is policy JP-Strat8 sound? In particular:

- a) Is the "Wigan-Bolton Growth Corridor" (as indicated on Figure 4.6) a suitable location for regionally significant economic and residential development?
- b) Is Policy JP-J1 part G(viii) justified in identifying the M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) as providing a major cluster of warehousing and distribution activity along the M6 corridor?
- c) Is it necessary for soundness to delete reference in the policy to just over million sqm of floorspace and 13,000 dwellings and to insert reference in the reasoned justification to just over one million sqm of floorspace and 13,000 dwellings?
- d) Is the policy relating to Hulton Park and land at Royal Bolton Hospital justified and consistent with national policy?
- e) Is policy JP-Strat8 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

Issue 5.7 Are policies JP-Strat9 to JP-Strat11 relating to Sustaining Southern Competitiveness justified and effective?

Paragraph 4.21 defines the southern area as most of Trafford and south Manchester but also Stockport, who will play a vital role through its own local plan.

Policy JP-Strat9 Southern Areas

Policy JP-Strat9 states that the economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced.

The GMCA response to PQ63 advises that reference to the “selective release of Green Belt and previously safeguarded land in key locations” relates only to the allocations in the Plan. A main modification to the first paragraph of the policy has been proposed which seeks to make this clear.

Q5.12. Is policy JP-Strat9 sound? In particular:

- a) Is policy JP-Strat9 justified in identifying the “Southern Areas” as an area where economic competitiveness and distinctive local neighbourhood character and environmental attractiveness will be protected and enhanced? Is the policy also justified in prioritising brownfield land, promoting the roles of town centres and other key assets and expecting an increase in the area's residential offer and strengthening of its economic role?
- b) Is it necessary for soundness to modify the first paragraph of the policy in terms of Green Belt release?
- c) Is policy JP-Strat9 clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

Policy JP-Strat10 Manchester Airport

Policy JP-Strat10 stated intention is to seek to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and the surrounding locality.

Policy JP-J1 part G(iv) identifies the Manchester Airport Enterprise Zone as a key location for economic growth, including the expansion of the airport and increased employment activity around the airport, Wythenshawe Hospital/Medipark and the proposed HS2 station. Policy JP-J2 part 3 identifies the Enterprise Zone as an area where office development is expected to be focussed. Policy JP-C6 part 3 supports the expansion of air freight activities at Manchester airport. We have included questions about those below to avoid duplication. Other questions about these policies will be set out in later matters.

The GMCA response to PQ64 advises that criteria 1 to 5 of policy JP-Strat10 do not all relate to specific allocations or proposals in the Plan but that there would be no requirement for either the Manchester or Trafford Local Plans to allocate additional land to meet the requirements of the policy. It goes on to state that planning applications in the area will need to have regard to policy JP-Strat10 to consider how they can contribute to the wider development and regeneration of this area.

The first paragraph of policy JP-Strat10 states that development which meets three criteria, including being in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSRS) will be supported. The GMCA response to PQ66 advises that the CSRS is not a formal planning document and has no planning status

but would be a material consideration as it addresses many issues covered by separate legislation.

Q5.13. Are policies JP-Strat10, JP-J1 part G(iv) and JP-J3 part 3 sound? In particular:

- a) Are policies JP-Strat10, JP-J1 part G(iv) and JP-J3 part 3 justified and effective in identifying Manchester Airport as a key location for economic growth and where benefits of the continued operation and sustainable growth of the airport should be maximised?
- b) Is the geographical scope of the policy JP-Strat10 clear and unambiguous such that it would be effective in providing a strategic framework for local plans and/or considering planning applications?
- c) Are policies JP-Strat1, JP-J1 part G(iv) and JP-J3 part 3 clear and unambiguous about the form and scale of development would be considered acceptable in principle at or around the airport?
- d) Is the reference in policy JP-Strat10 to development being 'in line' with the CSRS justified, consistent with national policy and effective? In particular, (i) the relevance of this document for development outside Manchester Airport itself (ii) whether it unnecessarily duplicates other legislation that is outside the scope of the planning process and (iii) whether it would defer important policy matters to a separate document and whether such matters should be included in the Plan.
- e) Are criteria 1-5 of policy JP-Strat10 clear and unambiguous in terms of development that is proposed through the Plan, development that is already committed, or development that is expected to be delivered through other Plans or strategies?
- f) Is what constitutes the "Airport City" in criterion 1 of policy JP-Strat10 sufficiently clear and how is the 500,000 sqm of employment floorspace identified intended to be delivered? What of this are existing commitments and what is allocated in the Plan?
- g) Is criterion 5 of policy JP-Strat10 clear and unambiguous in terms of what is meant by "providing sufficient development to take full advantage of the introduction of HS2 and NPR into this location"?
- h) How are criteria A-F of policy JP-Strat10 intended to be used either in providing a strategic framework for local plans or informing the preparation and determination of planning applications?
- i) Is policy JP-Strat10 otherwise clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

- Q5.14. a) Is part 3 of policy JP-C6 justified and consistent with national policy in supporting the expansion of air freight at Manchester Airport? Would the policy be effective in supporting efficient and sustainable movement of freight?
- b) Is this part of the policy intended to refer only to allocation JPA10 – Global Logistics Park?

Policy JP-Strat11 New Carrington

Policy JP-Strat11 states over the plan period land to accommodate around 4,300 dwellings and 350,000 sqm of employment floorspace has been identified and will be delivered in the New Carrington area. Policy JPA33 allocates the development site and establishes a requirement of 5,000 new dwellings.

The GMCA response to PQ68 confirms that it is not intended that there will be any need for the Trafford Local Plan to make provision for further development or infrastructure at this location.

Q5.15. Is policy JP-Strat11 sound? In particular:

- a) Is policy JP-Strat11 justified in identifying the New Carrington as a suitable location to deliver significant mixed-use development?
- b) To ensure effectiveness, should the policy establish the full amount of development expected to be delivered in the New Carrington area?
- c) Is policy JP-Strat11 otherwise clearly written, such that it would provide an effective strategic framework for local plans and an unambiguous policy to inform the preparation and determination of planning applications?

End of IN8 Annex 2