

Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	Stakeholder Submission
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	Our Strategic Objectives
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Objective 1: Morris Homes (North) Ltd support the objective to meet housing need. However, the specified measures and policies within PfE will not achieve this. To increase net additional dwellings is an unambitious aim which would be achieved regardless of PfE and has no relevance to the scale of need nor the Government's objective of "significantly boosting"the supply of homes (NPPF parag. 60).</p> <p>It is not considered that the components of the housing land supply and associated PfE policies concerning density of housing sites (particularly those in proximity to public transport hubs) will support delivery of a diverse mix of housing as defined in Objective 1. Similarly, the over reliance on apartment developments to achieve housing requirements is unlikely to support a sufficient increase in the number of affordable homes; evidence suggesting that such developments fail to deliver sufficient affordable homes due to viability constraints.</p> <p>Objective 2: It is not realistic to focus new homes within 800m of public transport "hubs"as there are an insufficient number of hubs available with</p>

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	suitable development sites within this distance to allow the objective to be met; further there is little justification for setting 800m as an appropriate distance to focus development.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Objective 1: It should be ensured that need for market and affordable housing is met, and that there should be sufficient housing to support the economic growth of Greater Manchester. Objective 2: Having regard to paragraph 105 of NPPF, significant development should be focussed on developments which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes.
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JP-Strat 6 Northern Areas
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Morris Homes support the intentions of Policy JP-Strat 6. It is welcome that the policy recognises that it is not only important to regenerate brownfield land but to increase the mix, type, quality and range of the residential offer. It is also welcome that it is recognised that the selective release of Green Belt and previously Safeguarded Land may be needed to achieve this.</p> <p>The pattern of growth has historically been uneven with growth concentrated in Manchester, Salford and Trafford and with the key assets and locations set out at 4.3 being in central parts of Manchester, this is set to continue without decisive action. Indeed, it is acknowledged at 4.6 that low forecast growth rates risk reinforcing rather than tackling the significantly worse performance of these areas. However, the Policy does not indicate the scale of growth which is expected across the Northern Areas and it will only be effective with sufficient developable land in the right places, as we comment upon under Policy JP-H1 and elsewhere.</p> <p>Paragraph 4.48 of PfE refers to the potential to increase the number of higher income workers who choose to live in the north. An influx of entrepreneurs and skilled workers would support business creation, support economic activity and reduce pressures within the southern areas. However, the Plan identifies an insufficient range of sites to achieve this, and none of the sites listed in 4.48 are in Wigan, despite suitable land being available, including sites outside of the Green Belt.</p>

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	The policy could indicate the scale of growth proposed, and refer to opportunities which the Plan should identify to diversify the housing offer in Wigan in order to attract an increased number of higher income households and rebalance the City Region by providing greater opportunities in the north
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Scale</p> <p>The Housing Topic Paper purports to discuss how the scale of housing proposed by Policy JP-H1 has been arrived at, beginning with the sentence at paragraph 6.6 "As expected by NPPF, the housing need set out in Joint Plan has been derived using the standard methodology provided in the NPPG for calculating Local Housing Need (LHN)."</p> <p>However, Planning Practice Guidance makes it apparent that it is necessary to distinguish between the outcome of the application of the standard method and the development of an appropriate plan strategy. This is inherent throughout the document, beginning with the statement that "Assessing housing need is the first step in the process of deciding how many homes need to be planned for." (ID: 2a-001-20190220). It goes on to say "The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure." (ID: 2a-002-20190220). Similarly, NPPF at paragraph 61 only requires that strategic policies to determine the minimum number of homes required are "informed by" a local housing need assessment conducted using the standard method, rather than automatically adopting the resultant figure.</p> <p>Planning Practice Guidance sets out when it might be appropriate to plan for a higher housing need figure than the standard method indicates, highlighting how the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. It reiterates how the standard method provides a minimum starting point, which does not predict the impact that future government policies, changing</p>

economic circumstances or other factors might have on demographic behaviour.

Some of the examples of where a higher figure might be justified are given at ID: 2a-010-20201216:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

- 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;

- where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.

To these it can be added that a higher total could be justified where it could help deliver the required number of affordable homes. (ID: 2a-024-20190220).

Morris Homes are not advocating an alternative approach to establishing housing need to the standard method, but request that the standard method is properly utilised as the first step in identifying the minimum housing requirement. The Housing Topic Paper simply ignores the issue of how the minimum level of need should be translated into a requirement.

In the case of Greater Manchester, a higher total would be justified by the following considerations:

- The Housing Topic Paper at 6.40 outlines a range of schemes and mechanisms intended to boost delivery. These include funding from the Housing Investment Loan Fund (which has committed over £458m to build over 6,100 units at 55 sites across Greater Manchester), the Brownfield Housing Fund, Getting Building Fund, Housing Infrastructure Fund and the Marginal Viability Fund. In addition, there is a pending Strategic Place Partnership with Homes England.

- PfE expressly proposes strategic infrastructure improvements which are specifically tied to increases in housing delivery. These are set out in the Greater Manchester Transport Strategy 2040 Refresh and accompanying Delivery Plans. They include investment in the motorway network and integrated public transport to support the scale of development proposed within the North-East Growth Corridor, together with new road and rail infrastructure in the Bolton-Wigan Growth Corridor.

- As noted in the PfE - Statement of Common Ground August 2021 (parag. 4.1) "The withdrawal of Stockport MBC from the joint development plan process does not negate that they are part of the Greater Manchester housing market area or travel to work area."

To expand upon the last point, it is apparent from the Statement of Common Ground that the relationship between the housing requirement of Stockport and PfE remains unresolved. The letter from PfE to Stockport Council of 11th June 2021 noted that work on Stockport's needs was incomplete and requested that details be shared when available "so that districts may consider whether it is possible to meet all or some of the need in PfE". The letter sought "to agree a process for future engagement between Stockport Council and the other nine districts regarding the scale and distribution of housing across Greater Manchester", but there is apparently no progress with this.

NPPF parag 26 states that "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy" and there is no

evidence that this has occurred. It remains highly unlikely that Stockport will meet its own development needs for both market and affordable housing and it is inevitable that people who might otherwise have chosen to live in Stockport will look elsewhere in Greater Manchester and add to housing pressure in the PfE constituent authorities.

With regard to whether a higher requirement should be proposed to help deliver the required number of affordable homes, affordability is clearly a serious concern in Greater Manchester. PfE refers at 7.2 to a "housing crisis" and says "lying behind this is a much more extensive problem of many people being unable to access suitable housing at an affordable price and with certainty of tenure. Over 70,000 people are on our local authority housing waiting lists with almost 27,000 "reasonable preference". A lack of appropriate housing options prevents some people from forming their own households, particularly younger adults, whilst those who can may have to cope with substandard or expensive accommodation."

It is acknowledged that "the supply can only be truly met through a more diverse range of new provision including a major boost in the supply of affordable housing", which is consistent with the evidence contained within Table 5.5 of the SHMA which shows that an annual average of only 1,446 dwellings have been completed over the last 8 years in Greater Manchester outside of Stockport. This compares with an annual need of 5,214 as revealed by Table 7.15, again excluding Stockport, which will far exceed the target of affordable 50,000 dwellings should this persist over the plan period.

However, no such major boost will result from a Plan which only proposes the minimum number of houses expected by the standard method, incorporating an annual affordability uplift of 1,164. Paragraph 22 of Executive Summary of the Strategic Viability Assessment finds that only about one fifth of the target of 50,000 units of affordable housing is capable of being delivered through Section 106 agreements. Therefore, there is compelling evidence that a higher housing requirement, in conjunction with the identification of viable greenfield sites, is justified.

Flexibility

The plan proposes a flexibility allowance of 16%. When almost 150,000 of the existing supply is either wholly or partially brownfield, much of which is long-standing and could have come forward already if it were genuinely developable, there continue to be significant doubts about the deliverability of a substantial proportion of the supply.

Much of Greater Manchester, including large swathes of the north, is covered by lower value areas (outside of VA1-3 as defined in the Strategic Viability Report Stage 1 September 2020) where there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft plan. In this context it is notable that, even looking at just the 5 year supply, the Strategic Viability Assessment Stage 1 Addendum June 2021 finds that 31% is unviable. This assessment is in any case based on a questionable assumption that all of the supply from large sites within the 5 year supply is viable.

An additional concern is that, according to the Strategic Viability Assessment Stage 2 Allocated Sites Report, viability is negative or marginal on a number of proposed allocations. Indeed, thirteen of the allocated sites are within Category 4, within which public sector funding is likely to be required or landowners and developers will not receive an acceptable return. This may result from viability not being adequately assessed as part of the site selection process, and substantiates the case to provide additional flexibility by means of the allocation of additional deliverable sites.

It is therefore requested that a buffer or at least 20% is provided for.

Distribution

The proposed distribution is intended to support higher levels of housing in the northern districts to achieve a more balanced pattern of growth. This is consistent with Policy JP-Strat 6 and supported by Morris Homes. It is also stated that "The proposed distribution of housing development also reflects the availability of suitable sites in each of the districts" and we dispute that this is the case.

As a general point, it is apparent that the consequence of a significant proportion of the supply being directed towards Salford and Manchester is that the balance of house types is disproportionately skewed towards city centre apartments rather than family housing, creating a balance of provision which is not aligned with needs arising within the PfE area. We also wish to comment on the numbers apportioned to Wigan in which Morris Homes have land interests.

The adopted Wigan Core Strategy (Policy CP6) currently makes provision for an average of at least 1,000 net additional dwellings per year between 2011 and 2026. However, Table 7.2 of the Housing Topic Paper shows that that average annual provision for 2021-2037 would be 972 dwellings. This compares with 1,350 completions in 2019/19 and 1,367 completions in 2019/20. It is perverse that PfE is actually proposing a reduction in housing development in Wigan when a key element of the spatial strategy of PfE is to rebalance the pattern of growth across Greater Manchester so that the potential of the northern areas is fully realised.

In discussing the attractiveness of the northern areas to a wider range of people, paragraph 4.48 says "In particular, there is the potential to increase the number of higher income households who choose to live in the north. The influx of more entrepreneurs and skilled workers could help to increase business creation and support local economic activity, as well as reducing pressure in the southern areas which currently have high levels of demand."

Wigan contains safeguarded land in Standish, which is eminently suitable for more aspirational housing as identified by the Inspector following the examination of the Wigan Core Strategy. Wigan as a whole has historically been affected by under-delivery of housing. It is appropriate to maintain the recent success of Standish in addressing this, by ensuring the continued availability of suitable sites including those which will attract higher income households as promoted by Policy JP-Strat 6. However, successful delivery to date means that there is only a limited residual supply with planning permission.

The safeguarded site which Morris Homes jointly own is at Rectory Lane, Standish. The case for the development of this site is set out in the accompanying Development Framework previously provided, although it should be noted that 413 of the 500 dwellings previously approved in phases 1 and 2 have now been completed.

-The site is jointly owned by Persimmon Homes and Morris Homes and under construction.

-As such the wider site has already been accepted as an appropriate location for residential development and access and services are already in place.

-The submitted Masterplan shows that some 438 dwellings could be accommodated based on a net density of 30 per hectare.

-Allocation of Phase 3 will allow continuity of development at the site to ensure the contribution to Wigan's housing land supply to be maintained following sustained under delivery.

Safeguarded land in Standish should be preferred in sequential terms to the release of Green Belt yet, contrary to the policy claim within JP-H1 that regard has been had to the availability of suitable sites, nowhere in the PfE evidence base have these opportunities for additional housing been fully

examined in advance of Green Belt review as required by paragraph 141 of NPPF.

The PfE Site Selection Paper discusses Safeguarded Land as follows:

"□the approach to POL / safeguarded land must vary in relation to its consideration in the GMSF. If the policy allows development of this land within the current plan period, and it has been considered appropriate in principle for development to be brought forward via a planning application, it has been included within the baseline housing land supply. However, where adding the land to the 2021 baseline supply would be contrary to a district's current Local Plan policy it was considered necessary to bring these sites forward for development through the Draft PfE 2021. This is because the PfE is being produced in advance of the adoption of district Local Plans in order that it can provide the overarching principles for those plans. However, because the Site Selection process outlined in this paper relates only to sites within the currently adopted Green Belt, these POL / safeguarded sites were not subject to the Site Selection process."

The Site Selection Background Paper therefore exclusively considers sites within the Green Belt and this represents a serious flaw in the evidence base for PfE which therefore cannot be regarded as justified. Instead, the sites only receive cursory attention in the 2020 Wigan SHLLA, the thrust of which is that the sites could be suitable for development subject to further consideration of infrastructure capacity which Wigan Council has not actually undertaken. This is apparent from the following extracts:

Wigan 2020 SHLAA site 0426 Residual land at former Standish golf course, Rectory Lane, Standish "Site owned by Morris and Persimmon Homes who intend to deliver as a further phase (or phases) to the existing approved adjacent development. The site is within the broad location for new development as set in Policy SP4 of the Local Plan Core Strategy. Suitability of the site for housing development is subject to the impact on local infrastructure capacity, including the local road network. Site is assumed unsuitable until suitability can be demonstrated. Areas of protected woodland have been removed from the developable area. Green infrastructure corridors running north-south and east west across the site would be sought to enhance sustainable connectivity."

It can only be concluded that the approach to Wigan has not been justified by consideration of reasonable alternatives or proportionate evidence and the PfE is not sound in this respect.

Phasing

The proposed phasing of housing delivery reveals a lack of confidence in the ability to deliver the brownfield sites on which PfE relies, concerns which are understandable in the light of how previous forecasts of delivery have fared, and the issues of viability across substantial areas of Greater Manchester as confirmed by the Strategic Viability Report. Paragraph 6.9 of the Policy refers to the need to understand the impact of Covid and refers to insufficient evidence of its impact, but table 7.2 proposes that acceptable delivery rates should be as low as 8,732 between 2021 and 2025 compared with 10,797 dwellings achieved in 2018/19 and 12,443 in 2019/20. As a consequence of the resultant lack of accountability in housing delivery, there will be a prolonged failure to satisfy housing need so that fewer people have access to suitable accommodation.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect

-Translate the Local Housing Need figure into an appropriate housing requirement taking account of the specific factors relevant to Greater Manchester which we have identified.

-Work effectively with Stockport MBC which is within the same housing market to address housing provision.

-Increase the flexibility allowance to 20%

of any legal compliance or soundness matters you have identified above.	<p>-Allocate an improved range of deliverable sites to ensure sufficient completions early within the plan period and avoid uncertain back-loaded delivery which will exacerbate the housing crisis in the short term</p> <p>-Review housing distribution for Wigan in particular and the range of sites which will be required to ensure delivery.</p> <p>-Undertake a site selection process consistent with national guidance by fully examining the potential of safeguarded land to influence housing distribution.</p>
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JP-H 2 Affordability of New Housing
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The first of the identified means of improving the ability of people to access housing at a price that they can afford within the policy is to significantly increase the supply of new housing in general terms, thereby reducing the potential for a shortfall to lead to large house prices and rent increase. However, PfE only proposes an average of 10,305 dwellings per annum, having treated local housing need as a proxy for the overall requirement rather than correctly treating it as a starting point.</p> <p>The affordability adjustment applied in the calculation of Local Housing Need is set at a level "to ensure that minimum annual housing need starts to address the affordability of homes." (PPG ID: 2a-006-20190220). There is no suggestion that it is intended to ensure that real affordable need is satisfied. Regarding the actual level of need, the Strategic Housing Market Assessment is an annual total of 5,214 households for the PfE plan area. Whilst this cannot be simply translated into a policy requirement for the plan period as a whole plan, it confirms why the delivery of affordable housing across the Plan area should be treated as a very high priority in accordance with paragraph 7.24.</p> <p>A policy approach which seeks to deliver the minimum amount of housing proposed by the standard method is not consistent with the declared priority. In Wigan, it remarkably actually proposes a reduction in new housing supply. In addition, the nature of the supply suppresses the availability of viable housing sites which will be able to make a full Section 106 affordable housing contribution. This is in contrast to high density apartment schemes which invariably fail to deliver policy compliant levels of affordable housing due to viability issues. As noted under our response to Policy JP-H1, paragraph 22 of Executive Summary of the Strategic Viability Assessment finds that only</p>

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	<p>about one fifth of the target of 50,000 units of affordable housing is capable of being delivered through Section 106 agreements. The supply is overwhelmingly dominated by previously developed land, yet it is predominantly greenfield sites which are able to deliver affordable housing at 30%, the minimum level which is required to make significant inroads into the shortfall. The substantial reduction in greenfield site allocations cannot do other than harm affordable provision.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Translate Local Housing Need into a housing requirement which is consistent with the identification of affordable need as a 'very high priority'.</p>
<p>Company / Organisation</p>	<p>Morris Homes (North) Ltd</p>
<p>Person ID</p>	<p>1287418</p>
<p>Title</p>	<p>JP-H 3 Type Size and Design of New Housing</p>
<p>Agent Company / Organisation</p>	<p>Mosaic Town Planning</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287418.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>NA</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>NA</p>
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Type</p> <p>Figure 4.29 of the Strategic Housing Market Assessment Update 2021 shows that Greater Manchester's dwelling composition differs from the national and regional picture, with higher proportions of terraced and semi-detached housing and lower proportions of bungalows, flats and detached housing.</p> <p>Paragraph 7.27 of PfE notes how many of the higher value suburban neighbourhoods are located in the south of the conurbation, and paragraph 7.28 states that "It is a key aim of this Plan to boost the supply of well designed, adaptable new homes with appropriate access to private open space." It is said that focusing a significant proportion of housing growth in the northern areas will assist this and that this will deliver higher value housing relative to prevailing values in the local area.</p> <p>Persimmon Homes support this key aim which is in accordance with Policy JP-Strat 8, but unfortunately Policy JP-H3 is in fundamental conflict with this. The reason for the tension is explicit in paragraph 7.30, which refers to the intention to maximise the amount of development on brownfield locations</p>

and minimise the loss of greenfield land. Whilst this is not objectionable in itself, the issue is how this is balanced with other land-use planning objectives, in addition to the question of whether the strategy will be effective as we have discussed under Policy JP-H1.

The approach chosen by PfE achieves no such balance, saying in paragraph 7.30 that "In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends."

At present, only Manchester and Salford are identified in the SHMA Update as authorities in which flats are the most prevalent property type. This is a reflection of the past tower block social housing construction, the relatively new city centre apartment market and the number of large houses split into flats to cater for students and young professionals as well as housing with multiple occupation (HMO) in light of the bedroom tax.

There is no evidence that it will be viable to develop 59% of the housing supply across the PfE area as a whole as apartments as envisaged in Table 7.3. The conditions in the urban core do not apply to the outer boroughs, some of which have unrealistic proportions of apartments proposed. As acknowledged in paragraph 7.31, smaller household sizes do not necessarily translate into demand for apartments where larger dwellings are sought to facilitate home working or accommodate visiting relatives.

Paragraph 7.33 states "The provision of appropriate outdoor amenity space will be vital in delivering high quality homes that support good health". The importance attached to this by consumers has increased due to Covid-19, as demonstrated by the strong demand experienced by volume housebuilders including Morris Homes. The PfE approach is manifestly incoherent as, notwithstanding issues of consumer demand and viability, it is not possible to provide "vital" amenity space to the degree required with such imbalanced provision.

Space and Accessibility Standards

The policy sets out concerns about "less adaptable dwellings that are unable to respond to the changing needs of households" yet this is precisely what will result from a high proportion of apartments for which there is only a limited demand outside of the urban core.

Notwithstanding this point, national guidance is clear that where the nationally described space standards or universal use of the "accessible and adaptable" standard is proposed, this must be substantiated by evidence. Had the universal use of the standards been considered appropriate by the Government, they would not have been made optional. People will make choices as to whether a home is suitable for them based on their circumstances and priorities including affordability, proximity to work or family, costs of upkeep and how they wish to use accommodation. For example, the size standard which might be sought for a bedroom is not necessary for a home office.

It should be borne in mind that the use of the standards incurs costs and that these may run counter to other objectives of the Spatial Framework. Paragraph 7.33 states that "cost considerations for both developers and households are placing further downward pressure on dwelling size". These will not be resolved by only allowing the construction of larger properties. Give the viability issues identified across much of Greater Manchester in the Strategic Viability Assessment, the likely result will be to reduce housing completions.

Neither the policy itself nor the Housing Topic Paper refer to the necessary evidence and so the policy approach cannot be considered as "sound".

**Redacted modification
- Please set out the**

It is appropriate to plan for a higher proportion of houses rather than apartments outside of the urban core to achieve both the overall housing

modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	numbers proposed and to provide the private amenity space required to provide residential amenity. An evidence-based approach is necessary to any application of specific space and accessibility standards.
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JP-H 4 Density of New Housing
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Paragraph 124 of NPPF sets out a list of considerations which should be taken into account to achieve appropriate densities. First amongst these is "the identified need for different types of housing, and the availability of suitable land for accommodating it". However, PfE has approached this from the opposite starting point. Paragraph 7.30 confirms that the delivery of the "necessary densities" is the imperative, and the conflicts inherent in the explanation to Policy JP-H3 (discussed in our representation) result from this, leading to an excessive focus on apartments which will lack "vital" amenity space. Similarly, local market conditions and viability seem to have taken a back seat outside of the urban core, where the market for high density development is uncertain.</p> <p>Morris Homes support the concept that new housing development should be at a density appropriate to the location and reflecting the degree of accessibility by walking, cycling and public transport. However, Policy JP-H4 sets out a highly prescriptive approach to minimum densities and neither the policy nor the Housing Topic Paper give any indication of how the proposed densities have been arrived at. For example, the physical context of suburban Metrolink stops and rail stations should not automatically be assumed to be suitable for 70 dwellings per hectare within a 400m radius. Such lack of justification reinforces the impression that density is regarded as an end in itself</p> <p>The policy seeks to apply rigid categorisations of centres and straight line distances from boundaries but there is no current uniformity in how the ten local plans currently designate centres and local plans are to continue to define them. The GMAL score data incorporated into the policy is not accessible to anybody without the technical skills to interpret the data.</p>

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	The policy purports to provide some flexibility on the basis of local housing market issues and site-specific issues, but then immediately negates this by adding "where it would not compromise the overall delivery of new homes in the district". The creates an expectation that unviable developments which would harm the townscape including heritage assets and green infrastructure should somehow be relied upon to achieve housing numbers, which is clearly untenable.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<ul style="list-style-type: none"> -Review approach on basis of the identified need for different types of housing and the availability of suitable land for accommodating it. -Review the unduly prescriptive approach. -Remove the use of GMAL data or provide this is an acceptable format. -Delete the phrase 'where it would not compromise the overall delivery of new homes in the district'
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JP-G 10 Green Belt
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Morris Homes object to the process by which Green Belt releases have been identified, as set out in the Site Selection Paper as this is not comprehensive and lacks transparency.</p> <p>It refers to a Stage One which considers opportunities on safeguarded land, but this forms no part of the process described within the Topic Paper which purely considered Green Belt sites. There is not systematic analysis of how safeguarded land has been "fully examined"elsewhere within the evidence based as required by paragraph 141 of the Framework.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance	Undertake transparent and comprehensible site selection process in order to do so, beginning with the proper evaluation of land which is currently safeguarded in Standish.

or soundness matters you have identified above.	
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JPA 35: North of Mosley Common
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The development is proposed to provide around 1,100 dwellings in the Green Belt.</p> <p>The Green Belt Assessment identifies that the allocation currently makes a significant contribution to checking sprawl (Purpose 1), preventing encroachment on the countryside (Purpose 3), and a relatively significant contribution to maintaining the separation of Tyldesley and Astley and Walkden. In terms of cumulative harm on Strategic Green Belt Area 8 (SGBA 8), release would constitute significant urban sprawl (Purpose 1), reduce the gap between settlements (Purpose 2) and encroach on the countryside (Purpose 3).</p> <p>With reference to the justification in the Green Belt Topic Paper, proposed additions to Green Belt elsewhere would constitute a long-term policy intervention rather than changing the effect of the proposed development.</p> <p>In accordance with paragraph 141 of NPPF, "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."</p> <p>Wigan already contains Safeguarded Land within Standish which is deliverable and has not been reasonably assessed within either the 2020 Wigan Strategic Housing Land Availability Assessment (which provides the baseline supply for Wigan) or within PfE. The Site Selection Background Paper only considers sites within the Green Belt and exceptional circumstances cannot be said to exist when the potential of safeguarded land within Wigan has not been examined fully.</p>

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	Allocation 35 therefore fails the test of soundness as not being justified or consistent with national policy.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	A proper site selection for Wigan should be undertaken to fully assess the potential of safeguarded land in accordance with paragraph 141 of NPPF.
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	JPA 37: West of Gibfield
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The development is proposed to provide around 500 dwellings in the Green Belt.</p> <p>As summarised in the Green Belt Topic Paper, the site at present makes a relatively significant contribution to checking sprawl (Purpose 1) and preventing encroachment on the countryside (Purpose 3), with land in the north making a lesser contribution, although land in the north makes a significant contribution to maintaining the narrow separation between inset land at Atherton and Westhoughton.</p> <p>The proposed allocation would narrow the gap between Westhoughton and Atherton and the area of Green Belt left would make a weaker contribution to preventing urban sprawl (Purposes 1 & 2). Its release would increase containment of the remaining strip of Green Belt to the east, although this area is already well contained (Purpose 3).</p> <p>In accordance with paragraph 141 of NPPF, "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</p>

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	<p>has examined fully all other reasonable options for meeting its identified need for development."</p> <p>Wigan already contains Safeguarded Land within Standish which is deliverable and has not been reasonably assessed within either the 2020 Wigan Strategic Housing Land Availability Assessment (which provides the baseline supply for Wigan) or within PfE. The Site Selection Background Paper only considers sites within the Green Belt and exceptional circumstances cannot be said to exist when the potential of safeguarded land within Wigan has not been examined fully.</p> <p>Allocation 37 therefore fails the test of soundness as not being justified or consistent with national policy.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	A proper site selection for Wigan should be undertaken to fully assess the potential of safeguarded land in accordance with paragraph 141 of NPPF
Company / Organisation	Morris Homes (North) Ltd
Person ID	1287418
Title	Other Comments
Agent Company / Organisation	Mosaic Town Planning
Type	Web
Include files	PFE1287418.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA