

Greater Manchester Combined  
Authority

**Integrated Assessment of the  
Places for Everyone Plan**

Non-Technical Summary

Issue | 12 July 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Ove Arup & Partners Ltd  
6th floor, 3 Piccadilly Place  
Manchester M1 3BN  
United Kingdom  
[www.arup.com](http://www.arup.com)

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# Contents

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	Page
<b>1 Introduction</b>	<b>1</b>
1.1 Purpose of this summary	1
1.2 What is the role of the PfE?	1
1.3 How has the GMSF evolved to the PfE?	1
1.4 Why undertake an Integrated Assessment?	3
1.5 How has the 2021 draft PfE IA evolved?	4
<b>2 What is the method of completing an Integrated Assessment?</b>	<b>5</b>
2.1 Introduction	5
2.2 What are the stages of an Integrated Assessment?	5
2.3 What is the PfE Integrated Assessment Framework?	6
2.4 Integrated Assessment to date	11
<b>3 2020 Assessment overview</b>	<b>12</b>
3.1 2020 Integrated Assessment of the Plan's Strategic Objectives	13
3.2 2020 Integrated Assessment of Growth and Spatial Options	15
3.3 2020 Integrated Assessment of Thematic and Allocation Policies	16
<b>4 2020 GMSF IA key findings and GMCA's response</b>	<b>17</b>
4.1 Strategic Objectives	17
4.2 Growth and Spatial Options	17
4.3 Thematic and Allocation Policies	17
4.4 GMCA response to 2020 IA	18
<b>5 2021 Assessment overview</b>	<b>20</b>
5.1 Introduction	20
5.2 2021 Integrated Assessment of the Plan's Strategic Objectives, Thematic Policies and Allocation Policies	20
5.3 2021 Integrated Assessment of Growth and Spatial Options and Reasonable Alternatives	21
<b>6 2021 PfE IA key findings</b>	<b>23</b>
6.1 Strategic Objectives	23
6.2 Growth and Spatial Options	23
6.3 Thematic and Allocation Policies	23
<b>7 Monitoring</b>	<b>27</b>



# 1 Introduction

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## 1.1 Purpose of this summary

The purpose of this non-technical summary is to explain and summarise the results from the Integrated Assessment (IA) of the Places for Everyone (PfE) Plan. It briefly explains how it has developed from the Greater Manchester Spatial Framework (GMSF). This is done by outlining the methodology, results, and recommendations from each stage of the IA. Each stage of the IA process is explained in further detail within the 2020 and 2021 IA reports.

## 1.2 What is the role of the PfE?

The PfE is a new policy document for nine districts of Greater Manchester which seeks to guide where development should go, and how it should be implemented to 2037. This is achieved through policies addressing certain development themes (such as sustainable development or green spaces) and strategic development locations (such as City Centres or growth corridors). In the PfE IA, these have been grouped together as ‘thematic policies’. In addition, there are site specific allocations made, which identify strategic areas for development in the nine districts of the Plan area (referred to as site allocations).

## 1.3 How has the GMSF evolved to the PfE?

In November 2014, the 10 Greater Manchester local authorities agreed to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”).

Work on the plan commenced, and the first draft was published for consultation in October 2016 and following substantial re-drafting, a second consultation took place between January and March 2019. Work

then continued on an updated plan, ready for the next round of consultation at the end of 2020.

In October 2020 the Association of Greater Manchester Authorities (known as AGMA) Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils. The Councils then needed to gain approval from their Executives/Cabinets to move forward to consultation and submission.

Following two Council meetings in early December 2020, Stockport Council decided not to submit the GMSF 2020 for consultation. As the joint plan needed all 10 Greater Manchester authorities to move forward, this signalled that the GMSF covering all 10 authorities could not be taken forward.

The nine remaining districts agreed that there continued to be a need for a joint plan. In December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint plan of the nine remaining Greater Manchester (GM) districts. Following this, each district also formally agreed to move forward with the joint plan.

Legislation enables a joint plan to continue to progress in the event of one of the local authorities withdrawing, as long as it has 'substantially the same effect' on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis. Consequently, the PfE Plan is continuing to the next Publication stage (as GMSF would have moved on to at the end of 2020).

Whilst the content of the Plan has changed over time, its purpose remains the same. In view of this, the environmental assessments carried out at previous stages remain valid (including their scope). To assess the impact of the changes between GMSF 2020 and PfE 2021 against the IA framework (the IA framework is explained below), a number of updated / additional reports have been prepared which form part of the overall environmental assessment and should be read in conjunction with the GMSF 2020 IA documentation. This includes:

- This PfE IA Non-Technical Summary
- Updated covering statement for the IA Scoping Report
- PfE IA Main Addendum Report
- PfE IA Growth and Spatial Options and Reasonable Alternatives Addendum Report

## 1.4 Why undertake an Integrated Assessment?

As part of the preparation of the PfE Plan, an IA has been undertaken for each draft. The purpose of the IA is to promote sustainable development, health and equality issues and ensure that they are considered as the plan is being prepared. The IA helps to guide the development of the PfE, by testing the policies at each stage, against an agreed list of objectives.

At each stage the IA then suggests ways to improve the policy.

There is a series of national and European legislation that the IA process should meet. The list below highlights which assessments and requirements have been addressed through this integrated assessment approach:

- Sustainability Appraisal (SA): this is mandatory under national legislation (section 19 (5) of the Planning and Compulsory Purchase Act 2004).
- Strategic Environmental Assessment (SEA): this is mandatory under European and national legislation (Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law)).
- Equality Impact Assessment (EqIA): this is a way of showing that the plans, policies and strategies proposed by the GM Authorities meet the Equality Act 2010.
- Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.

Stakeholder consultation is a significant part of the IA, and opinions and inputs from stakeholders have been sought on previous drafts.

## **1.5 How has the 2021 draft PfE IA evolved?**

The 2021 draft PfE IA has developed from the IA of the 2020 draft GMSF. As the 2020 draft GMSF was the starting point for the new PfE Plan, the IA has also taken this approach.

## 2 What is the method of completing an Integrated Assessment?

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### 2.1 Introduction

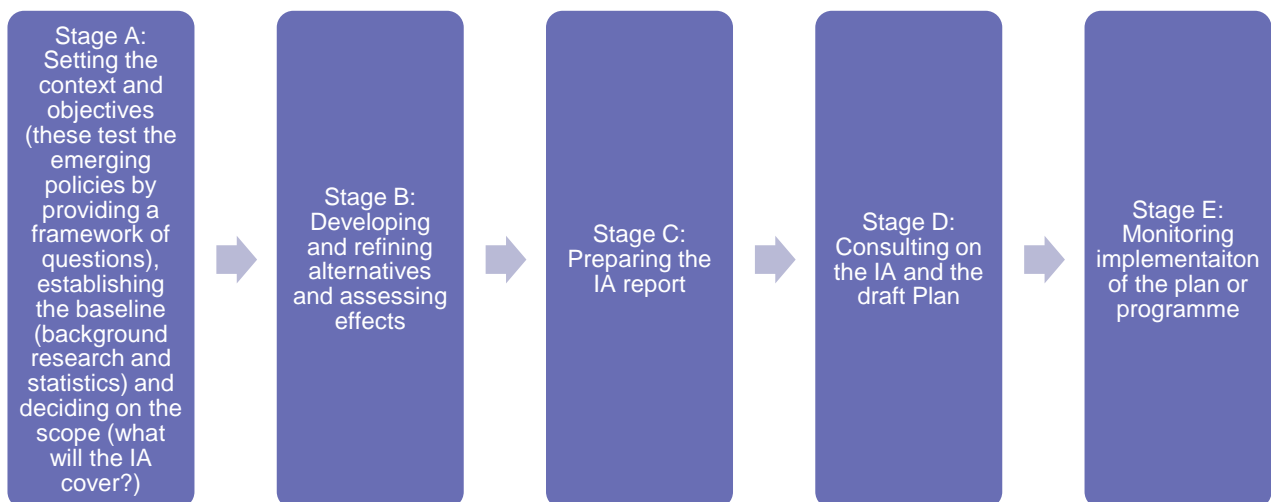
The IA involves a number of assessment stages (meeting the requirements set out in Section 1.3). The assessment works through the stages as the PfE Plan has developed. The assessments have been testing the emerging Plan objectives, strategy and policies against a set of 18 diverse IA objectives.

Further detail on the framework is provided within this section.

### 2.2 What are the stages of an Integrated Assessment?

The diagram below helps to explain the process which the IA has followed:

Figure 1: Integrated Assessment Process





## 2.3 What is the PfE Integrated Assessment Framework?

To undertake the IA stages above, the IA uses an ‘assessment framework’ against which to challenge and test the emerging Plan.

The IA Framework is made up of a series of 18 IA objectives and assessment criteria. They have been developed specifically for the PfE Plan. The IA Framework is used to identify the likely social, economic and environmental effects of the Plan, recommend ways of avoiding or reducing any negative impacts, but importantly, also recommending ways to further enhance the policy.

Stage A, described in Figure 1, results in an IA Scoping Report, which sits alongside the IA. The Scoping Report essentially scopes out the IA, looking at current and future social, economic and environmental characteristics of Greater Manchester and its key issues. It then looks at how the IA will assess the draft Plan. The Scoping Report has been reviewed in 2019 and again in 2020 to ensure it is up to date. The 2020 Scoping Report did not result in any changes to the original IA Framework. It did note the need to ensure climate change be given due consideration, in light of the districts’ climate emergency declarations. This was done using the relevant objectives and criteria in the existing IA Framework.

The Scoping Report was not updated in 2021, given it had been refreshed in 2020. However, a statement has been added to the beginning of the report to acknowledge the GMSF’s evolution to the PfE and to clarify that the existing IA Framework is considered robust and appropriate for the 2021 PfE IA.

The IA Framework (objectives and assessment criteria) is shown below (Table 1).

Table 1: IA Framework

Ref	Objective	Assessment criteria....will the PfE Plan:
1	Provide a sustainable supply of housing land including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	Ensure an appropriate quantity of housing land to meet the objectively assessed need for market and affordable housing?
		Ensure an appropriate mix of types, tenures and sizes of properties in relation to the respective levels of local demand?
		Ensure housing land is well-connected with employment land, centres and green space or co-located where appropriate?
		Support improvements in the energy efficiency and resilience of the housing stock?
2	Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation	Meet current and future demand for employment land across GM?
		Support education and training to provide a suitable labour force for future growth?
		Provide sufficient employment land in locations that are well-connected and well-served by infrastructure?
3	Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development	Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development?
		Improve transport connectivity?
		Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of development?
4	Reduce levels of deprivation and disparity	Reduce the proportion of people living in deprivation?
		Support reductions in poverty (including child and fuel poverty), deprivation and disparity across the domains of the Indices of Multiple Deprivation?
5	Promote equality of opportunity and the	Foster good relations between different people?
		Ensure equality of opportunity and equal access to facilities / infrastructure for all?

Ref	Objective	Assessment criteria....will the PfE Plan:
	elimination of discrimination	Ensure no discrimination based on 'protected characteristics', as defined in the Equality Act 2010? Ensure that the needs of different areas, (namely urban, suburban, urban fringe and rural) are equally addressed?
6	Support improved health and wellbeing of the population and reduce health inequalities	Support healthier lifestyles and improvements in determinants of health? Reduce health inequalities within GM and with the rest of England? Promote access to green space?
7	Ensure access to and provision of appropriate social infrastructure	Ensure people are adequately served by key healthcare facilities, regardless of socio-economic status? Ensure sufficient access to educational facilities for all children? Promote access to, and provision of, appropriate community social infrastructure including playgrounds and sports facilities?
8	Support improved educational attainment and skill levels for all	Improve education levels of children in the area, regardless of their background? Improve educational and skill levels of the population of working age?
9	Promote sustainable modes of transport	Reduce the need to travel and promote efficient patterns of movement? Promote a safe and sustainable public transport network that reduces reliance on private motor vehicles? Support the use of sustainable and active modes of transport?
10	Improve air quality	Improve air quality within Greater Manchester, particularly in the 10 Air Quality Management Areas (AQMAs)?
11	Conserve and enhance biodiversity, green infrastructure and geodiversity assets	Provide opportunities to enhance new and existing wildlife and geological sites? Avoid damage to, or destruction of, designated wildlife sites, habitats and species and protected and unique geological features? Support and enhance existing multifunctional green infrastructure and / or contribute towards the creation of new multifunctional green infrastructure?

Ref	Objective	Assessment criteria....will the PfE Plan:
		Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?
12	Ensure communities, developments and infrastructure are resilient to the effects of expected climate change	Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across GM?
13	Reduce the risk of flooding to people and property	<p>Restrict the development of property in areas of flood risk?</p> <p>Ensure adequate measures are in place to manage existing flood risk?</p> <p>Ensure that development does not increase flood risk due to increased run-off rates?</p> <p>Ensure development is appropriately future proof to accommodate future levels of flood risk including from climate change?</p>
14	Protect and improve the quality and availability of water resources	<p>Encourage compliance with the Water Framework Directive?</p> <p>Promote management practices that will protect water features from pollution?</p> <p>Avoid consuming greater volumes of water resources than are available to maintain a healthy environment?</p>
15	Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions	<p>Encourage reduction in energy use and increased energy efficiency?</p> <p>Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?</p> <p>Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?</p>
16	Conserve and/or enhance landscape, townscape, heritage assets and their setting	<p>Improve landscape quality and the character of open spaces and the public realm?</p> <p>Conserve and enhance the historic environment, heritage assets and their setting?</p> <p>Respect, maintain and strengthen local character and distinctiveness?</p>

Ref	Objective	Assessment criteria....will the PfE Plan:
	and the character of GM	
17	Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination	Support the development of previously developed land and other sustainable locations?
		Protect the best and most versatile agricultural land / soil resources from inappropriate development?
		Encourage the redevelopment of derelict land, properties, buildings and infrastructure, returning them to appropriate uses?
		Support reductions in land contamination through the remediation and reuse of previously developed land?
18	Promote sustainable consumption of resources and support the implementation of the waste hierarchy	Support the sustainable use of physical resources?
		Promote movement up the waste hierarchy?
		Promote reduced waste generation rates?

Each PfE policy is then assessed for the effect it has on the criteria above. It is scored by following Table 2 below.

When thinking about the effect of the thematic policies (such as looking at sustainable development or affordability of new housing for example), the types of effects a policy could have are also considered over the short-, medium- and long-term.

Table 2: Levels of effect

++	Very positive effect
+	Positive effect
?	Uncertain
-	Negative effect
--	Very negative effect
O	Neutral / no effect

Combined symbols are sometimes used in the assessment (e.g. ‘+ / ?’ or ‘- / ?’). Where this occurs, it is because there is a strong likelihood of positive/negative effects, but that there is insufficient information to achieve certainty at this stage. Alternatively, there may be a combination of positive or negative effects, depending on how the option under consideration is eventually delivered.

The assessment also seeks identifies if the effects are direct, indirect, temporary and/or permanent. The assessment also considers whether the effect will be a local, GM or wider concern. Where applicable, a description of what could be affected is also given, along with any cumulative effects which might occur.

## 2.4 Integrated Assessment to date

The IA has assessed the policies throughout the development of the GMSF and PfE Plan. The PfE Plan is based on the 2020 draft GMSF. It has been amended primarily to reflect the withdrawal of Stockport Council.

As such, the majority of 2020 IA remains relevant. All of the changes in the latest version of the Plan have been considered in this version of the IA. Therefore the 2021 IA of PfE is an addendum to the 2020 IA of GMSF; the following sections summarise both assessments.

### 3 2020 Assessment overview

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The Integrated Assessment of the 2020 draft GMSF was completed by following the steps below:

- Acknowledge and understand the progression made from the 2019 version of the GMSF;
- Undertake an analysis of the 2020 draft GMSF, following from the previous GMSF consultations and IAs; and
- Make recommendations to the 2020 draft GMSF following the above assessment as to how the objectives/options/policies can be strengthened). (Key recommendations are highlighted in Section 5).

This section provides a summary of the 2020 IA, looking at the relevant components of the GMSF including:

- The GMSF strategic objectives – the guiding principles for the framework;
- The growth and spatial options – an early stage where the GM Authorities looked at varying levels and locations for growth;
- The thematic policies - as explained above these cover a range of topics including housing, open space, transport and movement, heritage and many more; and
- The strategic site allocation policies – identify particular sites for future development in Greater Manchester.

## 3.1 2020 Integrated Assessment of the Plan's Strategic Objectives

### 3.1.1 Progression of the Plan's Strategic Objectives

A review between the 2019 and 2020 GMSF objectives has been undertaken and is summarised within the main IA report. The 2019 GMSF IA appraised 12 Strategic Objectives; however, following the comments, recommendations and review, the objectives were re-cast to the nine presented in the 2019 draft GMSF.

The 2020 objectives have evolved and reshaped following consultation and previous IA recommendations in 2019; however, their core ambitions are the same, with changes made to sub-objectives and their measurements of success. Objective 10 is a new objective which has been developed in partnership with Public Health colleagues.

### 3.1.2 Analysis of 2020 GMSF Objectives

A review was undertaken to look at the 2020 GMSF objectives alongside the IA objectives, in order to see how compatible they were with each other. This review relates to Stage B1 of the Strategic Environmental Assessment (SEA) process which requires the objectives of the plan to be tested with the SEA (IA) objectives to identify where they align and potential inconsistencies.

The following scoring key (Table 3) has been used in these assessments to highlight how compatible the IA and GMSF objectives are. The results are summarised in Table 4.

Table 3: Scoring Key

Very compatible	Objectives are aligned to the same or a very similar topic and aspiration	++
Compatible	Objectives are related and compatible (i.e. not in conflict) and can be achieved in parallel	+



Uncertain	There is insufficient information to determine compatibility at this stage	?
Incompatible	Conflict between objectives (i.e. they work against each other)	-
Very incompatible	Major conflict between objectives	--
Neutral/ no direct relationship	Objectives are unrelated and do not affect each other	○

Table 4: IA Compatibility Analysis of the 2020 draft GMSF objectives

IA objective	GMSF Objective									
	1	2	3	4	5	6	7	8	9	10
1 Housing	++	++	○	+	+	?	?	+	+	+
2 Employment	○	?	++	++	+	?	○	○	+	○
3 Transport and Utilities	○	+	○	+	+	++	+	?	+	○
4 Deprivation	+	○	+	?	++	?	○	○	+	+
5 Equality	+	+	+	○	++	?	?	+	+	+
6 Health	?	+	○	○	+	?	+	+	+	++
7 Social Infrastructure	?	?	○	?	○	○	○	+	++	+
8 Education and Skills	○	○	?	?	+	○	○	○	+	○
9 Sustainable Transport	○	++	○	+	+	++	+	?	+	+
10 Air Quality	?	+	○	○	○	+	+	?	?	+
11 Biodiversity/ Geodiversity	○	?	○	○	○	○	○	++	○	○
12 Climate Resilience	○	?	○	?	○	○	+	++	○	○

IA objective	GMSF Objective									
	1	2	3	4	5	6	7	8	9	10
13 Flood Risk	○	+	○	○	○	○	○	++	○	○
14 Water Resources	○	○	○	○	○	○	○	○	?	○
15 Greenhouse Gases	?	+	○	?	○	+	++	?	?	○
16 Landscape and Heritage	○	+	○	+	○	○	○	++	○	○
17 Land Resources	?	+	?	○	?	○	○	+	○	○
18 Resource Consumption	○	○	○	○	○	○	+	○	○	○

### 3.2 2020 Integrated Assessment of Growth and Spatial Options

The IA of growth and spatial options is subject to its own report, the 'IA of draft 2020 GMSF Growth and Spatial Options Paper'. The evolution of the growth and spatial options for Greater Manchester is outlined below, to provide context to the 2020 options.

The 2020 draft GMSF puts forward three growth options, and these were assessed using the IA Framework based on the 18 IA objectives. Synergies with the IA Framework were highlighted, and ways to enhance or mitigate any effects were suggested per option. The assessment tables for these options are contained within the appendix of the IA of Growth and Spatial Options Report.

The 2020 draft GMSF puts forward five spatial options (three were carried forward from the 2019 draft GMSF and two additional spatial options proposed). Therefore, the assessment was split into two parts:

- An independent review was conducted on 2020 options carried forward from 2019 (i.e. Spatial Option 1, 2 and 4). This resulted in a commentary on the 2019 draft GMSF IA for each option, as well as highlighting any differing assessment conclusions for consistency and suggestions for ways to enhance / mitigate the effects of the option.
- An assessment was conducted on the two additional spatial options (i.e. Spatial Option 3 and 5). Synergies with the IA Framework were highlighted, and ways to enhance / mitigate the effects of each option was suggested. The assessment tables for these options are contained within the appendix of the IA of Growth and Spatial Options Report.

### 3.3 2020 Integrated Assessment of Thematic and Allocation Policies

A review was undertaken on the 2020 draft GMSF thematic and allocation policies, in order to understand how the policy had changed since the 2019 IA and to identify if any further enhancement / mitigation was needed. Any new policies were appraised using the IA Framework, whereas updated policies were re-appraised to determine:

- If 2019 mitigation was addressed;
- Commentary on changes since 2019 version;
- Updated 2020 assessment (using the levels of effect listed earlier in Table 2) and summary of 2020 scoring; and
- Residual impacts / recommendations.

The full assessment tables for draft 2020 thematic and allocation policies can be found within the appendix of the main IA report.

## 4 2020 GMSF IA key findings and GMCA's response

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### 4.1 Strategic Objectives

As set out in section 3.1.1, the 2020 objectives have evolved since 2019. Their core ambitions are the same, with changes made to sub-objectives and their measurements of success. Objective 10 is a new objective which has been developed in partnership with Public Health colleagues.

### 4.2 Growth and Spatial Options

The IA assessed 2020 options (three growth and five spatial), as presented within the 2020 draft GMSF, against the IA Framework and objectives.

It is considered that enhancement and mitigation on the preferred options can be taken forward primarily through the implementation of GMSF policies. For completeness, enhancement and mitigation was included for every option assessed.

### 4.3 Thematic and Allocation Policies

The majority of 2019 recommendations were positively addressed by the policy itself or another appropriate thematic policy. A small number of residual recommendations remained from the 2020 IA, in order to further strengthen the policies.

In particular, this includes:

- Climate change (Objective 12) - As part of the review of the Scoping Report, it was concluded that there was no requirement to update the objectives. However, since the 2019 IA, there has been greater emphasis on the climate change agenda, reflective of the declaration of a climate emergency by the ten GM authorities. It is considered that Objective 12 does cover climate emergency, but it is recommended that policy references to climate change, net zero development and

sustainable construction are made to help strengthen the policies further. This could be achieved through amendments to each policy where sustainability and climate change is relevant (this would be the majority of policies within the 2020 draft GMSF). An alternative would be to strengthen, in more depth, key policies within the Sustainable and Resilient Chapter (such as GM S1), given the GMSF should be read as a whole. A third option would be to introduce a new climate change policy. If the second or third option is selected, a refreshed IA would be needed against those amended policies.

- Accessible design standards - whilst this is covered broadly in Policy GM-E 1 and within GM-H 3 relating to housing, it is suggested that policies are strengthened with more specific reference to accessible design of buildings and spaces to meet the needs of all users. This could be achieved through amendments to specific policies or through strengthening Policy GM-E 1.
- Deprivation - whilst again, this is covered within the supporting text and broadly within Policy GM-E 1, particularly referencing social inclusivity, it is considered that the policy could be more explicit in terms of inclusive growth and making jobs available to existing local communities or to those suffering from deprivation.

For allocation policies, in addition to the thematic points raised above, consideration could be given to:

- Greater consistency, where appropriate, in inclusion of social infrastructure requirements; and
- Any further mitigation of air quality issues.

#### **4.4 GMCA response to 2020 IA**

Following receipt of the 2020 GMSF IA, the GM Authorities reviewed the residual recommendations as summarised within Sections 6 to 16 of the main IA report, and also as set out in detail within the main report Appendix C and Appendix D.

They also reviewed other evidence and assessments, such as the Habitat Regulations Assessment, and made amendments to policies in order to positively address the findings and recommendations resulting from the assessments and consultations.

It was therefore necessary to produce an addendum to the 2020 IA in order to provide broad consideration of the impacts of changes to policies as set out in the updated 2020 draft GMSF, demonstrating the iterative IA process. The 2020 IA Addendum reviewed the amendments to the thematic and site allocation policies by identifying the following:

- Theme of the change;
- Relevant IA objective which the amendment addresses;
- Brief summary of the 2020 recommended IA mitigation which the change is seeking to respond to;
- Policies which have been amended;
- Summary of the change; and
- IA Addendum Commentary.

It was concluded that the changes to policies and supporting text primarily further strengthen the policies in relation to the associated IA objective. Where no changes to the individual policies were made against recommended IA mitigation, other policies within the 2020 draft GMSF which primarily address the mitigation were noted. Furthermore, it was recommended that consideration be given by the GM Authorities as to how achieving climate change ambitions and supporting the reduction of inequalities and deprivation can best be delivered through local policy.

## 5 2021 Assessment overview

### 5.1 Introduction

GMSF has evolved to PfE and a new 2021 draft PfE Plan produced. The following summarises the 2021 draft PfE IA. As explained above, the 2021 draft PfE IA is an addendum to the 2020 draft GMSF IA.

### 5.2 2021 Integrated Assessment of the Plan's Strategic Objectives, Thematic Policies and Allocation Policies

A review was undertaken of the 2021 draft PfE strategic objectives, thematic policies, and allocation policies to determine the extent and significance of change since the 2020 GMSF IA was conducted on the 2020 draft GMSF. All PfE policies were reviewed to ensure the 2021 IA was comprehensive in its assessment. Additionally, a compatibility analysis (as discussed in Section 3.1.2) was also performed on the strategic objectives. This portion of the 2021 IA is described within the 'GMSF Main Report – Addendum Report'.

The first step was to analyse the policies to summarise changes since the draft PfE Plan evolved from the GMSF. Based on the significance of changes and utilising professional judgement, each objective or policy was then rated as 'significant', 'potentially significant', or 'minor' level of change as indicated in Table 5 below. 'Potentially significant' demonstrates a precautionary approach, balanced with being proportionate.

Table 5: Level of change

Level of change
<b>'Significant' level of change</b> – where changes to the objective or policy are significant; therefore, a full reassessment is required.

**‘Potentially significant’ level of change** - where changes to the objective or policy were potentially significant; therefore, a full reassessment is required.

**No change or ‘minor’ level of change** - where changes to the objective or policy were not considered material; therefore, a full reassessment is not required.

An overall qualitative summary was included for each policy or objective to explain the effect these PfE changes would have on the IA scoring for the 2021 IA. The table containing the summary of changes is located within the main body of the PfE Main IA Addendum Report.

For those policies rated as ‘significant’ or ‘potentially significant’, a full 2021 reassessment was subsequently carried out against the IA Framework. The assessment tables are contained within the appendix of the PfE Main IA Addendum Report.

### 5.3 2021 Integrated Assessment of Growth and Spatial Options and Reasonable Alternatives

The IA of growth and spatial options is subject to its own report, titled ‘PfE IA Growth and Spatial Options and Reasonable Alternatives – Addendum Report’. The 2021 options underwent the same ‘level of change’ review as described in the previous section to determine if a full reassessment was needed against the IA Framework.

A total of three growth options were considered during the preparation of the 2021 draft PfE Plan. These were materially similar to the three growth options included in the 2020 GMSF, with some minor changes to reflect the updated nine districts.

A total of six spatial options were considered during the preparation of the 2021 draft PfE Plan. These were materially similar to the five spatial



options included in the 2020 draft GMSF, with the primary difference being that the preferred 2020 Spatial Option 4 was superseded by two options—Options 4a and 4b—in the 2021 draft PfE. Options 4a and 4b were considered ‘significant’ levels of change and were therefore subject to a full reassessment.

The summary of changes to the PfE options is shown in a table within the main body of the corresponding IA Addendum. The assessment tables for Options 4a and 4b are located within the appendix.

The PfE IA Growth and Spatial Options and Reasonable Alternatives – Addendum Report also includes the PfE Site Selection Background Paper (GMCA, 2021) as an appendix. The paper sets out how the IA Framework and its objectives were embedded into the site selection process undertaken by the districts.

## 6 2021 PfE IA key findings

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### 6.1 Strategic Objectives

Minor changes have been made to the PfE objectives to remove certain GM references, as a result of Stockport withdrawing from the Plan; this is the only reason amendments have been made to the PfE objectives. This does not impact on the IA conclusions.

### 6.2 Growth and Spatial Options

The changes to the 2021 growth options and the 2021 spatial options were minor, so they did not need reassessing. As a result there was no change to the IA scoring.

The two new spatial options (Options 4a and 4b) were assessed. Option 4a performed less well against IA objectives 1 and 17 due to this option proposing more land to be released for development than the identified need. Option 4b performed better than Option 4a as the proposed land for release was the same as the identified demand.

### 6.3 Thematic and Allocation Policies

#### 6.3.1 Summary of 2021 IA scoring

The following section summarises the scoring for the 2021 draft PfE IA.

#### **‘Minor’ changes to thematic and allocation policies as a result of Stockport Withdrawing from the Plan**

The majority of changes made to the thematic and allocation policies were to remove incorrect references to Greater Manchester, GMSF or Stockport references, as a result of Stockport withdrawing from the Plan. Such changes were considered minor as they did not change the key policy drivers or messages and therefore did not materially alter the Plan. As a result in these instances, the 2020 IA assessments were still valid and did not need to be changed.

### **‘Minor’ changes to clarify thematic and allocation policy wording or amend typographical errors**

There were also ‘minor’ changes to clarify policy wording or amend typographical errors. This did not result in any changes to the IA scoring.

### **‘Potentially significant’ changes to allocation policies to amend boundaries**

Five allocation policies underwent minor to moderate boundary changes. Given this amended the site allocation itself, all these changes were identified as ‘potentially significant’ and reassessed. These changes generally were to make the sites smaller and reduce the amount of Green Belt to be released. For the majority of these sites, the changes did not fundamentally change the physical character of the site allocation. One site (JP-A 28 – North of Irlam Station) has a more significant reduction, which has reduced housing yield and Green Belt land take. The sites which had more significant Green Belt removal, did result in improved scoring against Objective 17 (Green Belt). Sites with improved Objective 17 scoring include: JP-A 17 – Land South of Coal Pit Lane (Ashton Road); and JP-A 28 – North of Irlam Station.

### **‘Significant’ changes to allocation policies due to boundary amendments**

The only policy which was identified as a ‘significant’ change was allocation Policy JP-A 15 – Chew Brook Vale (Robert Fletchers), as its boundary and physical character of the site had changed significantly.

It is understood that there are a number of reasons for the reduction in area, which included avoiding area of floodrisk (Zone 3) and reducing land take from the Green Belt. The allocation is now all previously developed land. In addition, there were changes to the policy wording as a result of comments from Historic England.

These changes have resulted in a much smaller site which is not physically connected to the nearby built form of Greenfield village.

When assessed against the IA Framework, these changes result in the allocation performing better against Objective 13 (flooding) and 16 (conserve or enhance landscape or townscape). This is because areas of most significant flood risk were avoided, and additional wording added around a development scheme being informed by Historic Environment Assessment. Due to the site being less well physically connected to Greenfield Village, the allocation now performs less well against Objectives 3, 7, and 9 (which relate to transport network, social infrastructure and sustainable modes of transport), due to the site's changed position in relation to the nearby Greenfield village. It is acknowledged that the policy wording recognises the need for enhancements to connectivity, stating a development should... *“Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site”*. It is recommended that mitigation includes ensuring accessibility is considered and prioritised when bringing this site forward for development in addition to ensuring transport connectivity is considered and integrated for all sustainable modes of transport.

### **‘Potentially significant’ changes to thematic and allocation policy wording to amend land supply figures**

Housing figures have been updated to reflect the 35% uplift required in Manchester (as a result of the governments recalculation of housing need). Due to the new figures meeting the newly identified housing need, the policy is considered to perform the same against the IA Framework.

### **‘Potentially significant’ changes to thematic and allocation policy wording in relation to additional information (comments from Historic England)**

Historic England additionally provided comments which resulted in amendments to one thematic policy and several allocation policies. All of these policies were reassessed. The changes to the allocation boundary or policy wording either resulted in no change to the IA scoring as it had already included reference to the historic environment or performed better against Objective 16 (historic environment) as the wording was strengthened significantly.

### **‘Potentially significant’ changes to thematic and allocation policy wording to strengthen certain themes within the policy**

A number of policies have been amended to strengthen certain themes within the policy, such as improved flood mitigation (Policy JP-A-1.2), upgrades to Elton Reservoir (Policy JP-A 7) and HGV parking provision (Policy JP-A 29). Such changes scored better against the relevant objective, unless the policy was already sufficient strong in this regard.

The PfE policy changes and their resultant effect on IA scoring are summarised in more detail in the Main IA Addendum Report (2021).

## 7 Monitoring

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Monitoring of the PfE will be completed post-adoption, in accordance with the SEA Directive and Regulation 17 of The Environmental Assessment of Plans and Programmes Regulations 2004.

It requires the person by whom the plan or programme was prepared to monitor with a view to identifying, at an early stage, unforeseen adverse effects, and being able to undertake appropriate remedial action.

This IA has set up a framework against which monitoring could be undertaken. It will enable any unexpected adverse effects due to implementation of the PfE to be identified and potential mitigation options explored.

The monitoring arrangements can be set out in the Post-Adoption Statement.