

# Frequently Asked Questions

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# Section 1 – About the plan

## 1. How does this plan relate to the GMSF?

Places for Everyone was developed after Stockport Council decided last year to withdraw from the Greater Manchester Spatial Framework (GMSF). Following this the nine remaining Greater Manchester councils agreed to proceed with a new plan – Places for Everyone.

The plan has been produced using the evidence from drafts of the GMSF, as well as the views that were gathered as part of previous consultations.

Following this consultation, the plan will be submitted to the Secretary of State for Housing, Communities and Local Government in January 2022.

## 2. Why do we need this plan now?

The Government requires every local authority to produce plans that identify enough land to meet local housing and employment needs. It has given local authorities a deadline of December 2023 to have an up-to-date local plan in place. Places for Everyone will help the 9 local authorities to meet this deadline.

The Government has been very clear that we need to positively plan for recovery from the COVID-19 pandemic. The Prime Minister made his Build, Build, Build announcement at the end of June 2020 setting a context for England as we continue to recover from Covid-19.

## 3. Why is there only one consultation?

There have been two previous consultations on the GMSF. The first draft of the GMSF (2016) saw more than 27,000 residents in Greater Manchester provide feedback, and the plans underwent significant review, including reducing Green Belt impact.

The second consultation took place in 2019. More than 17,500 people, businesses and community organisations responded, and more than 67,000 comments were submitted.

Following the withdrawal of Stockport from the Greater Manchester Spatial Framework the remaining 9 Greater Manchester authorities - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan – have prepared a joint development plan document known as Places for Everyone

We've now published the document that we'd like to put forward as the final plan. This means that we have reached the statutory consultation stage known as Regulation 19

This is the final stage before the plan goes to the Secretary of State who will then appoint an independent inspector or inspectors to examine the plan.

#### 4. What makes a local plan 'sound'?

The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. These expectations are set out in paragraph 35 of the National Planning Policy Framework as follows:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

*This means that the councils must produce a plan which promotes economic growth in its areas and makes provision for the homes, employment and infrastructure which it determines are needed.*

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

*This means that the councils must have considered other policies and determined its approach based upon the most up to date and robust evidence including for example population projections, Strategic Housing Market Assessment, land availability, viability.*

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

*This means that the councils must be confident that the policies within PfE can be achieved within the plan period (2021 to 2037). The councils must also work with neighbouring authorities such as Stockport, Rossendale, Cheshire East, Warrington and Derbyshire.*

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

## 5. What makes a Plan 'legally compliant'?

People are also asked to comment on whether they think the plan is '**legally compliant**'.

You should consider the following before making comments on legal compliance:

- The Local Plan should be included in the current Local Development Scheme (LDS) and the key stages should have been followed.
- The process of community involvement for the Local Plan should be in general accordance with the LPA's Statement of Community Involvement (SCI).
- The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations).

The LPA is required to provide a Sustainability Appraisal (SA) when it publishes a plan. This should identify the process by which the SA has been carried out, the baseline information used to inform the process, and the outcomes of that process.

- The local authorities have met the 'Duty to Co-operate' when preparing the plan. The duty to co-operate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from that duty.

## 6. What is in the plan?

The plan sets out the **scale** of housing and employment floorspace we are looking to deliver over the plan period.

### Housing

Standard methodology for calculating housing need is set out in National Planning Practice Guidance. This should be used unless exceptional circumstances justify an alternative approach.

No exceptional circumstances have been identified to justify deviation from the standard methodology in Places for Everyone

Places for Everyone is planning for 10,305 new homes a year which amounts to a total of 164,880 homes by 2037.

### **Employment**

Unlike housing, in terms of economic growth, there is no equivalent methodology set out in planning policy. Our approach is based on the economic forecasting work that underpins wider Greater Manchester strategies. In the light of the UK Exit from the European Union and the Covid 19 pandemic, work has been undertaken to assess whether there is sufficient evidence to inform an alternative forecast, however at the moment the conclusion is, that there is not.

Land for at least 1,900,000 sqm of office floorspace and 3,300,000 sqm of industry and warehousing floorspace will be provided across the plan area between 2021-2037

### **Infrastructure**

Places for Everyone has been developed alongside with Transport for Greater Manchester's (TfGM) Five-Year Transport Delivery Plan, ensuring that new residential and commercial sites are supported by good transport infrastructure, including Metrolink stops and active travel routes.

Active travel infrastructure has been critical to many people as a way of staying active and getting around throughout the pandemic, and will be integral to enabling the city-region to meet the 2038 target of carbon neutrality. Greater Manchester has committed to delivering 100km of high-quality cycling and walking routes by December 2021 as part of the UK's largest cycling and walking network. There are currently 108 schemes in the development pipeline with a combined value of more than £500 million.

## **7. How will Places for Everyone affect district local plans?**

This plan sets out the strategic planning policy framework for the 9 districts. District local plans will need to be in 'conformity' with it, however more detailed policies and local matters are dealt with in the local plans of the individual local authorities. The Greater Manchester plan will not cover everything that a local plan would cover and districts will continue to produce their own plans.

## **8. What happens with Stockport now they aren't part of the plan?**

The Places for Everyone plan was developed after Stockport Council decided last year to withdraw from the Greater Manchester Spatial Framework. Stockport will now prepare its own local plan for new homes and sustainable development, while all local authority areas will continue to work collectively on a range of shared objectives and strategies including the Local Industrial Strategy, the Five-Year Environment Plan, and the 2040 Transport Strategy.

We will continue to work closely and cooperate and collaborate with Stockport. This includes sharing expertise and resources to support economic growth, bring in new investment and promote sustainable development in all areas of Greater Manchester.



## Section 2 – The detail of the plan

### 9. What does the plan say about the environment?

The pandemic has had an unprecedented impact on the way we live and will continue to impact everyone's lives as we learn to live with COVID-19.

As we seek to rebuild our economy, there is an opportunity to do so in a way which does not forfeit the environmental improvements seen over recent months by building back better to tackle our climate emergency and build a fairer, greener society.

Places for Everyone is one of the strategies that Greater Manchester needs if it is to become a carbon neutral city-region by 2038 – 12 years ahead of the UK target.

Places for Everyone will require all new development to be net zero carbon by 2028 – we do not want to build homes and workplaces which require expensive retrofitting in the future.

To reach our target, 96% of the cars on the road by 2038 will need to be electric. Places for Everyone will require new development to provide EV charging points to support this transition.

The GMSF 2020 identifies a Green Infrastructure Network and not only provides protection but also seeks to enhance it – the plan is seeking an overall gain in biodiversity.

Places for Everyone continues its approach to keep fossil fuels in the ground – hydraulic fracturing (fracking) will not be supported.

Greater Manchester's Clean Air Plan, approved by Leaders in June, will tackle air pollution by introducing a Clean Air Zone across the whole of Greater Manchester. More than £120m in government funding has been secured to help businesses upgrade to cleaner, compliant vehicles, ensuring that the city-region can bring down illegal levels of pollution while ensuring local businesses and traders receive fair financial support.

### 10. What type of land are we building on?

Places for Everyone has a 'brownfield preference' policy, and we're doing all we can to bring forward our brownfield sites in the early stages of the plan period.

The majority of land identified for development is in the urban area, including ninety per cent of housing allocations in the new plan are in urban areas.

Greater Manchester has already committed £97m from the Government's Brownfield Housing Fund to unlock brownfield sites for development. In total, 57 schemes have been identified to benefit from two tranches of the funding allocation, and a minimum of 5,500 homes on brownfield will be delivered through this funding, including more than 2,000 affordable homes.

## **11. What about the green belt?**

There is a lack of sufficient urban land to meet all of our housing and employment needs. On this basis, there are strategic exceptional circumstances for releasing some Green Belt land.

Green Belt release has been kept to a minimum, and is targeted in areas that will help us meet our overall vision for sustainable and beneficial growth.

Release of greenbelt has not been proposed lightly, and any release is accompanied by evidence as to how we can improve and enhance the remaining Green belt and green infrastructure elsewhere.

The net loss of Green Belt has been reduced by 60% compared to the 2016 GMSF through:

reducing the number of proposed sites

reducing the loss of Green Belt within sites

proposing 'new' Green Belt additions

The Greater Manchester Green Belt currently accounts for 46.7% of the land area covered by this plan. These proposals in this Plan would result in a net reduction of 3.3% (1,754 hectares) in the Plan's Green Belt ensuring that approximately 45.2% of the Plan area will still be Green Belt.

## **12. What does the plan say about transport and infrastructure?**

Places for Everyone has been developed alongside with Transport for Greater Manchester's (TfGM) Five-Year Transport Delivery Plan, ensuring that new residential and commercial sites are supported by good transport infrastructure, including Metrolink stops and active travel routes.

Active travel infrastructure has been critical to many people as a way of staying active and getting around throughout the pandemic, and will be integral to enabling the city-region to meet the 2038 target of carbon neutrality. Greater Manchester has committed to delivering 100km of high-quality cycling and walking routes by December 2021 as part of the UK's largest cycling and walking network. There are currently 108 schemes in the development pipeline with a combined value of more than £500 million.

## **Section 3 – The consultation**

### **13. What are you asking for views on?**

This is the plan that the 9 local authorities consider to be the plan they intend to submit to the Secretary of State for examination.

This is a formal stage of consultation and is used to gather feedback on 2 specific areas, whether the Plan is 'sound' and 'legally compliant'

### **14. How can I take part in the consultation and give you my views?**

Involving local people, organisations and businesses is an important part of the planning process.

The consultation will be live between 9 August and 3 October 2021.

Due to the Covid-19 pandemic and to help people stay as safe as possible we are urging people to respond online by going to [www.GMConsult.org](http://www.GMConsult.org)

People can read the plan and supporting information on these pages and we have also established a virtual consultation space which will be available through the GMConsult.

This interactive space gives people the chance to explore the plan and associated information in depth and then give an informed view.

### **15. How long is the consultation open for?**

The consultation is open for 8 weeks from 9 August and 3 October 21.

Unfortunately it is not possible for us to accept any comments received outside of the formal consultation period.

### **16. Why is the consultation eight weeks long?**

The Government outlines the terms of the consultation and requires a minimum of 6 weeks.

However, we understand that this is a detailed and lengthy document and want to make sure that everyone has the chance to read it and respond properly.

The evidence base we are consulting on was available in advance of the consultation. This will mean people have had sufficient time to view and familiarise themselves with the content before submitting responses.

### **17. Can I respond anonymously?**

Unfortunately, we can't accept anonymous consultation responses. In order for us to consider your comments as part of the formal planning process, we need to be able to contact you - just your name and an email address is enough.

### **18. Can I respond more than once?**

Please don't respond more than once. If you respond online, you don't also need to send something through the post, and vice-versa. During analysis of the feedback we will be checking for duplicate responses and removing these.

### **19. What happens next?**

At the end of the consultation phase, the plan will be prepared for submission to the Secretary of State next year. Following a public examination and approval by the Secretary of State, Places for Everyone would be ready for adoption by 2023.

## **20. What has been done to make the consultation on the plan effective?**

Consultation on the GMSF and PfE is carried out in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the nine participating districts' Statements of Community Involvement.

The first draft of the GMSF (2016) saw more than 27,000 residents in Greater Manchester provide feedback, and the plans underwent significant review, reducing Green Belt impact.

The last consultation took place in 2019. More than 17,500 people, businesses and community organisations responded, and more than 67,000 comments were submitted.

This plan has taken on board all of the evidence gathered and the views submitted as part of these consultations.

This is the final round of consultation before we submit the plan to the Government for its approval.

This is the version of the plan that the nine districts believe should be submitted to government. This is your opportunity to have your say on that plan.

## **21. Why is the consultation taking place during Covid-19?**

Government has sent a very strong message that Covid-19 should not be a reason to delay the preparation of statutory plans through the publication of emergency guidance to enable local authorities to continue to exercise their planning functions in a Covid-19 compliant way.

The Government has published updated planning guidance, including temporary measures for the planning system (Gov.uk - Coronavirus (COVID-19): planning update).

In terms of Local Plans, the guidance is clear that the Government want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the Government's aspirations to have up-to-date plans in place across the country by 2023.

## **Section 4 – Common challenges**

### **22. How does the Revised NPPF 2021 affect PfE2021?**

The Revised version of the NPPF, published on 20<sup>th</sup> July 2021, applies to PfE2021. It is our opinion that the changes within it are relatively limited within the context of a plan such as the PfE 2021 and we consider that the PfE 2021 remains in accordance with NPPF, including the revision published in July 2021. Therefore it has not been necessary to make any changes to the Plan at this point in time.

### **23. Where can I find the Sustainability Appraisal for Places for Everyone?**

The Places for Everyone plan is accompanied by an Integrated Appraisal which comprises a Sustainability Appraisal (which is mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004); a Strategic Environmental Assessment (which is mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004, which transpose the European Directive 2001/42/EC into English law); an Equality Impact Assessment (which is required to be undertaken for plans, policies and strategies by the Equality Act 2010), and a Health Impact Assessment. Although there is no statutory requirement to undertake HIA, its requirements have been considered to add value and depth to the assessment process.

### **24. How will Places for Everyone benefit me and my local area?**

This is our plan for jobs, new home, and sustainable growth – and that is what it will provide. By working together as the 9 districts we will provide the jobs and homes we need in a sustainable way, so they are integrated into our transport network or supported by new infrastructure.

It will also protect our Green Belt land from the risk of unplanned development and create the condition for achieving our wider ambitions to tackle inequality and address the housing crisis.

We believe this will benefit all of our areas and help them to grow and thrive.

### **25. Surely my area would be better of withdrawing from Places for Everyone and producing its own 5 year local plan with no release of Green Belt?**

A stand-alone local plan for any of the nine local authorities would need to cover the same strategic policies as PfE. Alongside this The National Planning Policy Framework (NPPF) specifies that strategic policies should look ahead over a minimum 15-year period so it would not be possible to prepare a Local Plan covering a 5 year period.

By working together the 9 districts, housing can be distributed to the areas that can support it most sustainably, meaning less Green Belt land is required to meet our collective housing needs.

The Government has previously said that it would take away the planning powers of councils that fail to produce a local plan, so by working together on PfE, we are avoiding a local plan being imposed instead.

Without this plan, all of the Green Belt would be at risk as developers would be able to appeal against refusal of planning permission.

## **26. Why can't my area meet its five-year housing supply without Places for Everyone?**

All councils have to demonstrate a five-year housing supply. If it can't demonstrate this then developers who submit planning applications for housing that are not in the local plan and whose applications are rejected by the council are more likely to win planning permission on appeal. This is because the planning inspector will take into account the fact the council doesn't have a five-year supply of land for housing.

Some of the 9 boroughs are unable to identify the amount of land needed to achieve a five year supply of housing on their own. By working together all of the districts can make sure that housing need is met.

## **27. Doesn't Places for Everyone use the wrong housing figures to calculate the number of homes we need?**

The starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN).

The Government has previously carried out consultation on changes to the methodology based on the 2018 household projections.

However, following the consultation, the Government determined that the 2014-based projections should continue to be used as the baseline for the standard method, but that a 35% cities and urban centres uplift should be applied to the top 20 urban local authorities (including Manchester City Council).

### **28. Are Central Government housing targets mandatory?**

The Local Housing Need is based on the 2014-based household projections.

The standard method for strategic policy making is not mandatory but Government guidance state that there needs to be exceptional circumstances to justify an alternative approach. We don't consider that there are exceptional circumstances to justify not using the standard methodology to calculate local housing need for the Places for Everyone.

### **29. Surely it's down to the individual councils to decide how many houses to plan for?**

National planning policy states that plans should as a minimum provide for sufficient homes unless other policies in the Framework provide a strong reason for restricting this.

It is often argued that Green Belt constraints are sufficient justification for not meeting housing needs in full.

However, during the recent examination of the Welwyn Hatfield Local Plan, the Inspector told the council that it risks having its draft plan found "unsound and so cannot be adopted" if it does not provide a list of potential Green Belt sites to meet its housing need figure.

### **30. Why has the annual housing target not reduced significantly now that Stockport has withdrawn?**

Stockport was a net beneficiary of the GMSF joint plan in that it was able to offset around 5,000 of its housing targets elsewhere within the GM conurbation.

Initially, it was considered that Stockport's withdrawal from the joint plan could have meant that there would be further opportunities to reduce targets in the other districts and, therefore, a potential to reduce the amount of Green Belt that was required to



be released given that the remaining districts would no longer be required to take some of Stockport's housing need.

However, the opportunity to do this was effectively removed with the changes that were made to the Government methodology for calculating LHN (introduced in December 2020). These changes included a requirement for Manchester City Council to accommodate a 35% uplift over its previous housing target (increased their housing target by over 14,000). This meant that the increased targets in Manchester no longer mean that it could absorb some of the housing targets from elsewhere in the conurbation. Consequently, there is no opportunity for other areas to reduce their targets as a result of Stockport's withdrawal.

### **31. You don't need to touch any Green Belt, I think you can just build houses on brownfield site?**

The Government's methodology gives a minimum baseline housing target for the nine boroughs of almost 165,000 homes over the plan period (10,305 homes per year). A land supply buffer is required to provide flexibility and choice and take into account that not all of the identified sites will come forward

Ninety per cent of land identified for housing in the plan is in the urban area, however there is not sufficient housing land in the urban area to fully accommodate our need.

PfE has a strong emphasis on prioritising the use of brownfield sites. Greater Manchester has already committed £97m from the Government's Brownfield Housing Fund to unlock brownfield sites for development. In total, 57 schemes have been identified to benefit from two tranches of the funding allocation, and a minimum of 5,500 homes on brownfield will be delivered through this funding, including more than 2,000 affordable homes.

### **32. Places for Everyone is proposing to release more land than required to meet the nine boroughs housing need?**

This is required as part of the planning process as plans need to demonstrate sufficient flexibility in the event that sites do not come forward as expected or if a Planning Inspector deems sites are not suitable or deliverable. Our viability study highlights some of the challenges we face in bringing forward brownfield land in

some of our towns. An additional supply is therefore needed to act as a buffer and make sure that housing need is fully met.

### **33. If the plan gets approved, won't developers will just build 4 and 5 bedroomed houses and not provide affordable housing? Just to make the biggest profit?**

The Plan identifies land to meet almost 165,000 homes – the type and size of these will be determined by the local authorities to meet local needs.

The Government provides a definition of affordable homes - and of course affordability varies on people's circumstances.

The definition includes social rented homes (housing associations), shared ownership and rent to buy, below market-level rent and many other types. There will be a wide mix of housing types, tenures and choices over purchase or rent.

Policies in the Places for Everyone plan commit the districts to deliver their share of the Greater Manchester target of 50,000 affordable homes as set out in the Greater Manchester Housing Strategy, as well as the detailed allocation policies which include a requirement for developers to make provision for affordable housing in accordance with local planning policy requirements.

### **34. How have the plan's sites been selected in a transparent way?**

In November 2015, a 'Call for Sites' exercise was launched in conjunction with the GMSF whereby local residents, businesses, landowners and developers were invited to identify sites that they thought could be suitable for housing or employment development.

Following the 'Call for Sites', all sites have been assessed against a series of key principles and criteria to determine their suitability as potential sites to be included within the joint plan.

This process is set out in the Site Selection Background Paper which is available on our website.

### **35. Why do we need to build more homes? There are lots of empty houses in Greater Manchester**

Vacant dwellings, or empty homes, are a part of any functioning housing market as homes are bought, sold, re-let and refurbished. Concentrations of empty homes vacant for extended periods are potentially problematic, while conversely extremely low levels of vacant properties may indicate extremely high demand. Just over 2.6% of dwellings across Greater Manchester were classed as empty in 2019, which is slightly lower than the level in England as a whole (2.7%). The Strategic Housing Market Assessment sets out the detailed position across the 9 districts

Empty homes are not allowed to be taken into account in making a local plan

### **36. What infrastructure is being proposed? These plans will lead to unacceptable pressures on the current infrastructure.**

This plan is about a lot more than just homes and jobs. For major developments it outlines what infrastructure, such as schools and doctor surgeries will be provided to support them, meaning that existing services won't face extra pressure.

Transport for Greater Manchester (TfGM) has also released its 2040 Transport Strategy Delivery Plan. This sets out all the transport improvements to be implemented by 2025, as well as longer-term plans that will in part ensure the success of the Places for Everyone joint plan.

### **37. How has the plan taken account of the impacts of Covid-19?**

Covid-19 has had a major impact on the way people live and work over the shorter term and there remains a degree of uncertainty over its impact in the long term. Our evidence paper 'Covid 19 and PfE Growth Options' explores this issue.

However, the Government has been very clear that we need to positively plan for recovery. The Prime Minister made his 'Build, Build, Build' announcement at the end of June 2020 setting a context for England as we continue to live through the pandemic.

The PfE Joint Plan is an essential building block of the city region's long-term success and recovery.