

Background Paper

GMSF Winter 2015/16 Consultation

Summary of Responses Received

October 2016



Greater Manchester Spatial Framework

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1. Background and Introduction

- 1.1. A consultation on the draft vision, strategic objectives for the GMSF, three potential growth options and five background papers were published for public consultation between the 9 November 2015 and 11 January 2016. A “call for sites” exercise was also undertaken alongside the consultation exercise and local residents, businesses, land owners and developers were invited to identify sites that could be suitable for housing or employment development. Whilst an initial deadline of 11 January was set for the call for sites exercise the map remains available to anyone wishing to submit a site.
- 1.2. Over 180 responses to the consultation were received (just over 140 to the options paper 40 to the background papers). Just under 25% of responses were made online (i.e. through the Objective system) and the majority of the rest by email. A full list of the organisations who responded to the consultation is provided in Appendix A.
- 1.3. The Options consultation consisted of six documents - one options document and five background papers. The background papers include: *Area of Assessment*; *Economic Development Needs Assessment*; *Objectively Assessed Housing Need*; *Infrastructure and Environment* and *Integrated Assessment*.
- Area of Assessment - identifying the overall area of assessment, and the implications for translating need and demand into individual district requirements.
 - Economic Development Needs Assessment - identifying the evidence that informs employment floor space requirements;
 - Objectively Assessed Housing Need - identifies the evidence available to inform the objectively assessed housing need for GM;
 - Infrastructure and Environment – this paper begins to identify and draw out key strategic issues for GM; and
 - Integrated Assessment – an independent report, produced by Arup, which provides a Sustainability Appraisal (SA), Strategic Environment Assessment (SEA), Equality Impact Assessment (EIA) and Health Impact Assessment (HIA).
- 1.4. Whilst this report aims to provide more detail regarding the consultation of the options document, it does refer to the background papers throughout. More detailed analysis of the comments that were received regarding the background papers is in the Annex.
- 1.5. Representations were submitted by a wide range of respondents including other Local Authorities (including adjoining districts), service providers, housebuilders, planning consultants and land and property developers. There were a number of environmental groups represented as well as a number of individual responses and others from interest groups. A full list of the organisations who responded to the consultation is provided in the Appendix.
- 1.6. This report identifies the key themes that emerged from the responses. As part of the process of validating the representations to the consultation, the responses were categorised into a number of themes and sub-themes as follows:
- General consultation
 - Area of assessment
 - Employment and Economy
 - Environment
 - Housing
 - Place
 - Transport

- People
- Social infrastructure
- Options

1.7. This report does not provide any commentary or response to the comments received. Rather, it seeks to identify the variety of comments received, and highlight the different approaches recommended by the respondents to the consultation.

2. General Consultation

2.1 This section looks in more detail at the comments related to the consultation as a whole. These include practical issues related to timescales and the process of producing the plan. Further general comments included the defined scope of the papers, opportunities for development and the overall vision. These all represented sub themes that are the cross-cutting basis of the plan going forward.

Key Messages

- Documents were difficult to understand. More accessible information, such as summary documentation, would be useful.
- Respondents wanted to ensure that the Duty to Co-operate is fully met, with GM engaging with adjoining authorities and private sector, such as the house building industry, effectively;
- The objectives should reflect the differences between the ten GM authorities;
- There have been no responses made to the 2014 consultation comments;
- GM should amend or broaden the scope to include the various suggestions that respondents have made;
- GMSF must set out the scale and distribution of housing and employment for the 20 years following its adoption, not the next 20 years;
- The GMSF should clearly set out what it will and will not be dealing with;
- The GMSF should clearly set out what the role of Local Plans will be;
- The ambition, vision and aspirations are constrained by the approach used to test the options;
- GM should consider having a 'Challenges' sub-heading in the Vision and Ambition chapter;
- GM should clarify what is local and what is strategic;
- GM should assess which growth options will deliver the Vision and Ambition, potentially through an independent commission

General

2.2 There were a number of consultation comments as to what GMSF should cover and should do. These are briefly set out below:

- Summarise the evidence used to influence the GMSF;
- Establish development needs across GM for the plan period;
- Identify strategic sites and the spatial distribution of sites that are required to meet those development needs;
- Identify economic growth aspirations to meet the aims of the Northern Powerhouse;
- Reconsider and define the city and regional centre in terms of spatial definition and approach;
- Review the green belt, set out the methodology for review and assess the impact on any green belt release;
- Identify nationally and regionally important infrastructure investment;
- Clarify the balance between growth and environmental objectives;
- Provide a greater focus on sustainability and quality of life factors;
- Respondents sought clarity to understand what constituted strategic issues and what constituted local issues. This also related to understanding the strategic allocations of sites.

2.3 A critical element in GMSF will be engagement and the need to meet the requirements of the Duty to Co-operate. A number of specific points were made in relation to this:

- Bordering authorities noted that cross-boundary issues have been appropriately considered and to date Duty to Co-operate is fully met. Others welcomed the fact that issues had been identified and sought meetings to support the development of the evidence base;
- Some authorities that are not prescribed bodies in relation to the Duty to Co-operate legislation were highlighted. GMCA was asked to consider the connectivity between them as neighbouring authorities, with a joint Core Strategy in consultation of their strategic growth options and detailed policies.;
- Utilities providers and Highways England both commented that they are happy to be involved in the development of the GMSF. For utilities providers, this was in respect of identifying any infrastructure issues and appropriate resolutions. For Highways England, this involved ensuring the transport implications, particularly in so far as they relate to the strategic road network, are adequately addressed).

Strategic issues

2.4 Overall, respondents commented that the GMSF should deal with strategic issues and local issues should be left to the districts. One respondent stated that local and strategic issues should be integrated and another that strategic working will be essential across GM so the balance should be strategic with less priority given to local issues within GMSF.

2.5 It was felt that there is value in a countywide strategic approach, but it was also highlighted that there is value in fitting this within a North West regional perspective too. Linked to this, it was felt that the GMSF should not prevent local areas from departing from the strategic blueprint for GM in their Local Plans if they should choose to do so.

2.6 It is argued by some that the balance must be in favour of local strategic issues, and subsequently the design of a consultation and further political processes should allow citizens easy input to the planning process. With a focus on local strategic issues, it was felt that there should be a drive to devolve power to the lowest appropriate level.

2.7 Respondents noted that the status of the GMSF with regards to the Local Plans of the ten GM districts needs to be clarified. The GMSF should aim to be an exemplar project of how many local authorities can work together as one combined authority to achieve the visions and ambitions of GM.

2.8 Devolution was generally seen in a favourable light by respondents. Previous attempts at devolution were judged to be unsuccessful because there was not enough democratic support. It was felt that there needs to be a clear proactive approach to engage the public. Blackburn with Darwen Council, for example, support devolution in GM. The authority highlighted that the consideration of younger people and affordability for future transport is particularly welcomed. A substantial proportion of Blackburn with Darwen residents, many of whom are young people, regularly travel to GM for education, leisure and employment

2.9 A number of comments argued that the power to make decisions regarding the issues raised in the GMSF should be devolved to the lowest appropriate level. This would enable more people to engage with the economy and help to reduce the potential negative impacts of poor economic decisions that are made elsewhere, and which local people have no control over.

2.10 The GMSF's countywide approach to strategic planning was considered valuable, but it should also be consistent with a North West regional planning perspective. Similarly, the GMSF should allow the ten districts of GM the flexibility to depart from the strategic plan in their Local Plans, if they choose to. However, it was not clear to a number of consultees how the ten districts of GM would be bound to the plan.

2.11 It will be important to ensure that the drafting of Strategic Development Management policies recognises the diversity and quality of the conurbation's assets and allows distinctiveness to be celebrated. GM already has a number of distinctive assets and qualities but the proposed evidence base work does not give some respondents the confidence that these are adequately appreciated at present. Similarly, it does not provide confidence that these assets will be appropriately assessed and their contribution to GM properly understood as part of the GMSF. It was felt that, there is currently a real danger that those distinguishing features will be overlooked to the detriment not only of their intrinsic qualities but also of the wider benefits and opportunities that they bring to GM and its people.

2.12 As well as the vision and strategic direction, the strategic issues that respondents felt should be dealt with at the GM level included :

- The appropriate housing and employment need required across GM and for each district;
- A requirement for NPPG compliant housing and employment market areas;
- Strategic land allocations, including any necessary alterations to the green belt boundary;
- Broad locations of development should be identified to focus development in certain areas;
- How individual authorities will assess sites;
- The deliverability of sites across GM;
- Key infrastructure requirements;
- Strategic Development Management Policies;
- What will be expected from each LA in delivering the GMSF;
- Requirements of Local Plan documents;
- The strategic aims of other key documents such as the Northern Powerhouse, the Highways England Road Investment Strategy and more specifically the M60 NW Quadrant Study; and
- GM's approach to energy, waste and minerals.

2.13 Respondents also raised the importance of local input:

- Voices of local people must not be ignored by creating one GM vision;
- Communities are best placed to decide on issues in their local areas;
- Local Plans and master-planning should set out the intricacies of how sites will come forward;
- Power needs to be given to local opinions and councils to ensure 'buy in' to the GMSF; and
- Housing and employment distribution needs to be set out in Local Plans, informed by GMSF.

Timescales and Local Plans

2.14 With reference to the first sentence of paragraph 1.19, it was felt that the GMSF must set out the scale and distribution of housing and employment for the 20 years following its adoption, not the next 20 years. The reason for this is that the emerging plan will have two parts and the second part (Local Plans) will be produced by the individual authorities following the adoption of the GM Spatial Framework. By including a 20 year time horizon from the adoption of the GM Spatial Framework, this will ensure that at least 15 years of the plan period still exists when the subsequent Local Plans are adopted as required by paragraphs 47 and 157 of the National Planning Policy Framework (NPPF).

2.15 Further to this, respondents noted that if "non-strategic" allocations are dealt with by Local Plans, which commence after the GMSF is adopted, the earliest Local Plans will be prepared by is 2020. This was felt to be too late for GM to have a deliverable land supply. GM cannot wait almost a decade after the start of the plan period (2014) to begin meeting the development needs that exist now. Respondents argued it must aim to meet the Government's Local Plan deadline of 2017. Strategic sites sometimes have longer lead-in times associated with master planning and infrastructure delivery. As such, if the GMSF deals only with strategic land, delivery in the first years of the plan-period will be overly dependent upon current sources of land, much of which is in weaker market areas, is not being delivered at the rate needed, and is not suited to the full range of current housing and employment needs. This means it will be the early to mid-2020s before the development that is needed can actually be delivered. This is a threat to the sustainability of the conurbation and its ambition to become one of the world's most successful cities.

2.16 The relationship between the GMSF and GM Authority Local / Neighbourhood Plans should be made clearer, according to respondents, including a timescale for their preparation. This is particularly pertinent given the Governments clear intention to ensure that all Local Planning Authorities (LPAs) have an up-to-date Local Plan in place by early 2017.

2.17 The ten districts have great variation and as such, the Development Management policies are better placed at Local Plan level. Trying to establish regional development management standards will be a long and complex process that is likely to unduly delay the progress of the GMSF.

Process

2.18 There were criticisms of the GMSF process itself:

- The website was felt to be difficult to access and negotiate;
- There has been no attempt to inform the community of the GMSF, according to some respondents. This could be interpreted as apathy or agreement with the plans. More specifically there was felt to be little evidence of any concerted effort to engage with local

deprived communities. Planning Aid England can offer qualified planning professionals to assist with this process on a voluntary basis if this is required;

- Respondents felt that there has not been adequate engagement with the development industry or business community;
- The general consultation process has not been adequate, according to some of the respondents. The deadline date for a response to the consultation should be extended to enable the residents and businesses of GM to be properly informed of the existence of the GMSF and to give a proper opportunity to submit comments;
- There were felt to be too many weighty documents within this consultation; it is not realistic to expect the layman to be able to offer specific feedback. A concise summary and an illustration of the geographical framework would be welcomed;
- Respondents were disappointed that there is no review of the information and advice provided by consultees in response to the initial consultation on the evidence (from 2014) and in particular no indication of how it had been taken into account in the subsequent work that has been carried out.

2.19 There was also some concern that the evidence base is not an objective starting point of the GMSF process. It was felt that the evidence base has been applied in a pessimistic manner and underrates the growth potential of GM. These concerns were raised previously at the Initial Evidence stage but remain unaddressed. To resolve this further discussion and consultation is welcomed before the next plan making stage.

2.20 Similarly, there is criticism that the GMCA has not engaged with GM adjoining authorities effectively. The question was raised as to whether the in-depth discussions have taken place and if they have this should be referenced.

2.21 Overall, it is argued that GMCA has undertaken little meaningful engagement and best practice elsewhere has involved engaging with the business community, LEPs and the development industry. GMCA should adopt a similar approach. Failure to do so risks the GMCA plan being found unsound. As it stands the GMCA's work has not been peer-reviewed and is therefore neither objective nor independent.

Vision

2.22 There was much support for the *Vision and Ambition* to drive economic growth in GM and in the wider region as part of the Northern Powerhouse. However, many respondents believed that the evidence base and the preferred Growth Option 2 were not ambitious enough to deliver this Vision and Ambition.

2.23 Only one respondent explicitly objected to the *Vision and Ambition* because they believed that there was too much emphasis on ambitious growth, competing with other cities. The respondent felt that there should be more emphasis on wellbeing, health and quality of life.

2.24 Another idea put forward was to consider having a 'Challenges' sub-heading in the Vision and Ambition chapter to outline the challenges to achieving the Vision. These could include balancing economic growth with protecting the environment, climate change reduction and adaptation; infrastructure provision; and delivering viable sites.

2.25 Most respondents neither supported nor objected to the *Vision and Ambition* but suggested amendments. These included references to specific projects, planning issues that they thought were missing or should have a spatial dimension and references to specific areas and places in GM.

2.26 There were various elements submitted that it was felt should be referred to within the Vision:

- The aim should be for GM to become the UK's second city and the driver behind the Northern Powerhouse;
- Retaining the character / identity and requirements of different areas in GM;
- The redevelopment of the area around Piccadilly Station, including the new HS2 terminal;
- Recognising the value of having greater connectivity between urban and rural areas, including those within GM's wider catchment area (e.g. High Peak, for potential leisure, recreation and health benefits);
- Stating that greenfield and green belt land will be required to meet growth in GM;
- Statements about protecting the environment, reducing use of finite resources and improving health to counter balance the drive for economic growth;
- Including a greater ambition and a measurable commitment to reduce carbon emissions;
- Referencing the historic environment and place;
- Acknowledging affordable housing as part of the housing offer and recognising the different types of affordable housing that are preferred in the districts;
- Growing employment sectors such as the logistics industry;
- Place making and delivering sustainable regeneration;
- Identifying a vision or strategy for the town centres in GM, including defining the hierarchy of centres;
- Referencing the contribution of the existing population in GM, such as the need to ensure up-skilling, training and enhanced employment opportunities, rather than focus on attracting new people into the region; and
- Identifying the importance of the visitor economy.

2.27 suggestions for actual wording in this regard included

- *'GM will be one of the worlds most revered and successful regions, driving sustainable growth across a thriving North of England in a way which values its environmental and historic assets. It will be ever more productive, innovative and creative, known for the excellent quality of life enjoyed by its residents who are able to contribute to and benefit from the prosperity that growth brings, whilst having sufficient open spaces, countryside and fresh air to reap all benefits to the full.'*
- *'Create truly sustainable communities with the social and community facilities required to deliver improved health and well-being'.*

Opportunities and constraints

2.28 The responses highlight that it is important that GMCA give considerable weight to and explicitly refer to the opportunities that exist to fully capitalise upon the significance of Manchester International Airport. If GM is to become a city recognised on a global scale, it will be necessary to ensure that the potential of the airport can be maximised through the allocation of appropriate strategic sites in locations well-connected to the airport, which can respond to a variety of market demands.

2.29 It was highlighted that there is a perceived disconnect between the opportunities arising through both the Northern Powerhouse and the devolution of powers, and the constrained approach to evidence and options testing put forward in GMSF. The approach was felt to be heavily influenced by past trends, projecting similar levels for the future. This could lead to a missed opportunity.

- 2.30 Respondents noted that the generalised nature of the objectives meant that there is very little differentiation between the diverse locations in GM. This was not felt to be appropriate and would miss the opportunity provided by the GMSF to recognise such difference.
- 2.31 Several respondents felt that the plan should highlight that constraints and opportunities will vary from site to site. The importance of each constraint and opportunity will therefore vary depending on the site in question. When assessing future opportunities it should be acknowledged that there is a distinction between site-specific environmental constraints and planning policy designations such as settlement limits and green belts.
- 2.32 It was equally felt that it is important to note that constraints apply equally to existing urban sites and land outside the urban area. The GMSF suggests that constraint information will only be considered for sites outside the existing urban area. This approach was felt to be flawed.
- 2.33 There were two types of constraints identified: physical or environmental constraints, and policy constraints. The constraints that have been identified were felt to fall significantly short of the factors that will influence development and need to be taken into account. Likewise the opportunities component was not felt to be addressed clearly in the document.
- 2.34 Some respondents noted that the list of constraints fails to properly identify the range of factors that should reasonably be taken into account, even when considering possible strategic allocations. Furthermore the question was argued to make no distinction between strategic and non-strategic sites. Therefore, it was felt that a significantly greater range of factors should be considered. Suggestions included:
- Existing infrastructure and associated easements and consultation zones;
 - Planned Infrastructure;
 - Landscape;
 - Hazardous Installations and HSE consultation Zones;
 - Highways;
 - Tree Preservation Orders;
 - Heritage Designations;
 - Flood Maps; and
 - Ecological designations.
- 2.35 A further general point was raised that constraints and opportunities are all equal and therefore need equal consideration.

Scope

- 2.36 A number of respondents were supportive of the scope. However, as with the Vision, suggestions were made as to topics or themes that the scope should include:
- Being sufficient enough to provide a suitable strategic framework for the delivery of Local Plans;
 - Referring to the importance of the quality of place and supporting communities to grow;
 - Recognising the need to identify a broad range of partners and players to deliver the strategy;
 - Recognising the need to co-ordinate health and social care functions and funding;
 - Including spatial dimensions;
 - Encouraging a modal shift to public transport, walking and cycling;
 - Referring to economic "growth" as a focus on decent jobs and a relatively re-localised economy;

- Including a greater emphasis on carbon sequestration and water management;
- Including a consideration of food production within the conurbation and its hinterland;
- Replacing "welfare reform" with a commitment to social justice and equity;
- Replacing "independence" with one that values interdependence and social risk sharing;
- Including explicit reference to social and community infrastructure;
- Referring to the impact the GMSF may have on waste and minerals, and their associated plans;
- Establishing clear timescales within which Local Plans are consistent with the GMSF;
- Ensuring a robust framework for the conservation and enhancement of the historic environment;
- Establishing how development needs will be met across GM;
- Identifying strategic sites and some smaller sites to support delivery in the shorter term;
- Clarifying what the GMSF is not intended to be, and what it will not cover;
- Including retail requirements and hierarchy over the plan period;
- Defining what is meant by a 'strategic land allocation';
- Setting out how the framework is to be used and also how its ambitions will be delivered;
- Defining how far the GMSF will suggest type / tenure of housing, set housing standards and set design standards, amongst other things;
- Considering development needs beyond the 20 year plan period;
- Providing a framework of sustainable development that meets the needs of all communities;
- Consider the environmental and social pillars of sustainability;
- Mentioning the new responsibilities that the GMCA will be taking on with regard to health;
- Ensuring a clear framework for the timing of the release of land;
- Setting out the type of development required in specific local growth areas;
- Taking account of the diversity within GM and within each district;
- Outlining how rural communities can prosper rather than becoming 'feeder suburbs'; and
- Referencing the relationship between transport infrastructure and development, regeneration, housing needs, housing location, viability and place-making. This includes key place-based issues relating to transport provision, which still need to be addressed and planned for.

2.37 Concerns were raised in relation to the compliance with existing legislation, such as NPPF and the PPG. The Plan will not exist in isolation and there are basic legal conditions that it must satisfy given that it will be a Statutory Development Plan Document. Respondents felt there were a number of pieces of evidence base documents within its scope that need to be completed, including an SHMA, SHELAA, Green Belt Assessment and Retail Assessment. In addition, respondents identified that the Duty to Co-operate should be satisfied to ensure cross-boundary issues are appropriately considered.

3. Area of Assessment

3.1 This theme aims to look at whether it is agreed that Greater Manchester is a suitable area of study to plan for. It covers the issue of local identity within GM, identifies any sub-markets put forward by respondents and in particular looks at the identified Housing Market Area (HMA) within the options and Background Paper.

Key Messages

- Ensure existing communities benefit not suffer from planned new development;
- Embrace Natural Capital rather than seeing it as a constraint;
- Tackle the poor reputation of some of our neighbourhoods;
- Look at a neighbourhood approach to the GMSF with 'bottom-up' evidence base
- Look at the potential of meeting some of GMs OAN in areas outside of GM.
- Make reference to the retention of local services and community facilities;
- Greater Manchester should not be looked at as a single HMA;
- Large, family homes are required;
- Regard should be given to each Local Authority SHMA;
- Without a SHMA or a SHELAA there cannot be a clear understanding as to the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period

Strategic and local issues

- 3.2 Respondents sought clarification of whether issues in the GMSF were being addressed at neighbourhood, local or strategic levels. They also wanted to understand how these issues interacted with one another. Some stated that a top-down and bottom up approach is needed integrating Strategic (GM), Local and Neighbourhood Plans. Strategic management as well as local management policies should be provided at GM level.
- 3.3 Some respondents felt that GMSF should be restricted to strategic infrastructure, growth strategies and overall development strategies. They advocated that LPAs should be responsible for developing local detail.
- 3.4 Respondents stated that they needed to understand the nature, attributes and constraints of the separate areas that make up GM and an understanding of the connectivity (actual and required) between the regions prior to finalisation of an overarching Development Plan.

Neighbourhoods

- 3.5 Most of the responses to the GMSF consultation focussed on strategic or local issues. However some key issues concerning neighbourhoods were raised. Neighbourhoods were discussed in terms of communities, neighbourhoods and local issues at a sub-local authority level.
- 3.6 One respondent noted that the GMSF needs to establish the difference between areas and place across the authorities, as there are differences in the ability to develop in different areas at the local level. Cost value issues and overcoming these need to be considered.
- 3.7 There was a call that the GMSF took a bottom-up “neighbourhood approach” and that an evidence base that informs strategic issues should be prioritised. This was interpreted as ensuring that the wishes of people, businesses and communities at a local level need to be understood and recognised in term of the development of the plan.
- 3.8 The specific issues concerning neighbourhood involvement included:
- Recognising the value of neighbourhoods and their unique assets in terms of the physical environment. In many cases this related to the value of both green and blue infrastructure;
 - Ensuring that existing communities are recognised in the development of the plan and that it is clear on how to link existing neighbourhoods in attracting investment and the benefits that new development will bring to an area;
 - Ensuring that the economic aims in the GMSF should be focused around tackling the poor reputation of some areas of GM; and arguing without this investment there may be limited attraction to new stakeholders / investors in GM, which will mean that the gaps between neighbourhoods will increase;
 - It was felt that for GMs rural communities the GMSF at present does not refer to local services or community facilities. Respondents asked that they were referred to as assets that support rural economies;
 - Clarifying in the GMSF how new homes will be integrated into existing communities to ensure physical and social cohesion;
 - Identifying how the GMSF will protect sites that are important to existing communities; and
 - Identifying the role of town centres and supporting them to keep their identity.
- 3.9 It was also highlighted that it would be helpful to consider how the different principles of the GMSF might influence development at a neighbourhood level. In particular, it would be useful

to identify the potential links that exist between the principles underpinning sustainable regional growth and interventions to improve the quality of life within neighbourhoods - for example, how age-friendly government policies could be combined with spatial planning policies throughout the GMSF.

Housing Market Area definition

- 3.10 The consensus from respondents was that GM is not a single Housing Market Area. They argued that the spatial geography of housing need across the city region is complex. Examples of differences included that there is very little commonality between the northern districts with those in the south. Respondents argued that by having a single HMA the GMSF is assuming that people are willing to move long distances across Greater Manchester to find a suitable home. The reality is that many people want to stay in areas that they are familiar with, and the vast majority of house moves are over a short distance.
- 3.11 Respondents also noted the GMSF must consider housing needs in different areas and be wary of imposing a top-down figure that treats GM as a single HMA. They argued that GM should assess areas separately, which would enable a more responsive plan to housing needs in relation to dwelling type, size, tenure and market indicators. The analysis of market signals must be undertaken at a much finer scale that reflects functional housing market areas, acknowledging the range of differences in the housing market conditions and economics of each authority.
- 3.12 As with the responses to the November 2014 consultation, respondents reiterated their view that GM is made up of at least four housing market areas – Central, North West, North East and Southern. They argue that looking at the four different HMAs would be a more appropriate starting point and in accordance with NPPF guidelines. Not doing so risks creating an overt focus on the potential of the regional centre to deliver new homes and these may only cater for a certain demographic and economic needs.
- 3.13 In relation to the four suggested HMAs, some respondents provided a view on the types of development in each area - for example, inner-city areas of Manchester for high-density apartment-led schemes in order to support regeneration and renewal.
- 3.14 It was also stated that it may be appropriate to seek to redistribute housing requirements between districts within GM. However the redistribution should only occur within the same HMA and where there is an identified relationship.
- 3.15 Some respondents also noted that some of the GM HMAs are also impacted by markets in authorities / areas outside of GM. It therefore needs to be clear how this will be addressed in the GMSF. Respondents provided the example of the southern part of Greater Manchester, arguing that it is intrinsically tied with the housing market in the former Macclesfield authority area (now Cheshire East). This is reflected in house prices, demand, affordability and migration patterns amongst these areas. Respondents refuted the argument that housing need in the southern part of GM could be met in the northern part on the basis that it represents one market area. If all of the needs within the south Manchester market area cannot be met within the GM area, it is imperative to apply the Duty to Co-operate with Cheshire East Council. Similarly, Rossendale is no longer defined as a self-contained HMA. It is expected that the wider HMA in which Rossendale sits will include parts of northern Greater Manchester. There would be concern if the spatial distribution within GM as a whole led to pressure being put on Rossendale to accommodate any of the development provision that is needed within Bury and Rochdale.

3.16 Related to the definition of the Housing Market area and the Housing OAN respondents argue that a SHMA consistent with PPG and NPPF should be undertaken. It is argued that without a SHMA only one aspect of housing need has been considered i.e. the overall scale. In addition, a SHELAA will also need to be completed before Greater Manchester decides on the preferred growth option.

4. Economy and Employment

4.1 This chapter looks at the key economic and employment issues that have been raised in the consultation. This particularly includes issues related to economic growth, sectoral distribution and employment, and any economic issues put forward in relation to the Northern Powerhouse and devolution. This section also includes a more detailed look at employment issues including skills, sectors, employment locations and comments related to the requirement for office and industrial employment.

Key Messages

The following key messages and requests were provided by respondents:

- Recognise the substantial growth in emerging sectors – such as innovation and technology, creative and digital industries, and life sciences – and how this will affect demand for modern workspaces;
- Recognise the ambitions of the Northern Powerhouse;
- Make more reference to the city centre and regional centre as key drivers of the regional economy;
- Highlight the explicit link between house building and economic growth;
- Emphasise the economic impacts of significant infrastructure projects such as High Speed 2;
- Address the issues of retail and leisure should be addressed in further detail;
- Assumptions made about some of the factors that link housing/population to need to be sensitivity tested;
- Analyse how planned investment will impact upon jobs growth and labour force supply;
- The economics of viable and deliverable development should be identified;
- Consider the full extent of the growth planned to achieve global city status. T - there is too much emphasis on past trends;
- Recognise that a regional centre- based economic plan will increase the need to travel and drain resources from the rest of GM / NW;
- Address the tourism economy in urban areas outside Manchester city centre;
- All economic scenarios be subject to PopGroup modelling;
- Incorporate the issues raised in the consultation, such as addressing the low wage economy, land for food production and the implications of an older working population in the future;
- Refer to culture and its link to employment needs;
- Plan sufficiently for the logistics sector;
- Explicitly support the ambition to increase the skills of GM's workforce;
- A more thorough assessment of the quality and viability of employment land this supply is required;.
- Consider how more people working from home and less floor space required for manufacturing industries would affect economic development land requirements;
- Growth of the industrial, warehousing, logistics and manufacturing sectors have been constrained by a lack of high quality accommodation and the availability of large, developable sites in suitable locations; and
- The Deep Dive sector work is unavailable to comment on, but is recognised as being crucial evidence.
- Need to ensure that the GMSF employment land requirements have been prepared on a proportionate evidence base which complies with the guidance in paragraphs 160 – 161 of the NPPF

General

- 4.2 Respondents generally consider that the key economic issues have, overall, been identified and addressed. However, it was argued that the approach to the economy is both cautious and inflexible, and falls significantly short of the rhetoric set out in the Vision. A further criticism was that economic issues are promoted as individual themes, and that the consultation does not adequately draw them together to present a view of how each theme is inter-related.
- 4.3 There were a number of comments around sustainability and it was put forward that a major flaw of the GMSF is that it does not make the fundamental linkages between housing and sustainable economic growth. One of the significant barriers to economic growth is argued to be not just the quantity of housing but that new homes also have to be of the right quality, in the right places and of the right tenure type. There also appears to be no consideration of the economic role housebuilding can and should play in GM. The availability of housing is key to attracting and retaining the skilled workforce necessary to achieve growth. Respondents noted a need to ensure that objectives for economic growth are suitably matched with housing and associated infrastructure to ensure a sustainable approach to development. Also in terms of sustainability it was emphasised that there should be a focus on the maintenance and improvement of the sustainability of existing towns and neighbourhoods by investing in existing homes and improving local social infrastructure. More specifically, food production is a key economic issue for our long term sustainable future and GMSF should include a strong commitment to protect good quality agricultural and horticultural land.
- 4.4 In terms of the distribution of employment, the future plan should make sure that employment opportunities need to be spread more evenly across GM. The economic assets identified reflect stronger links and growth to the centre and south of GM. For example, Manchester Airport, links to London, Port Salford and generally the city centre itself. This creates a challenge for those areas that are less well connected to these key economic assets.
- 4.5 There were also a number of comments linking the environment to economic issues. There was a general argument that the inter-relationships with the economy were inadequately dealt with, and that there is a far from adequate focus on environmental objectives and how these fully integrate with the economic imperatives. Examples are given of the very significant role the environment plays in the visitor economy, the income derived from it and the jobs, services and management activities that it supports.
- 4.6 The historic environment, local identity and character need to be referenced in relation to economic issues. The GMSF should consider the role that the historic environment can play in delivering its other planning objectives (NPPF, Para 126t). It is argued that green infrastructure should be incorporated into the economy section as there is evidence that green and attractive areas are more desirable to investors. The natural environment is an economic issue and economic growth and the natural environment are not mutually exclusive. It was also argued that GMSF needs to address climate change in economic terms and make sure that building climate resilience supports economic growth.
- 4.7 The omission of retail and leisure uses was felt to be a weakness in the economic evidence base.
- 4.8 It is noted that the housing outputs from the economic scenarios are not modelled using PopGroup. It is argued that this inevitably leads to inconsistencies in the way that the various scenarios and OAN range are determined. It is recommended that for consistency and transparency all economic scenarios are subject to PopGroup modelling.

4.9 It is argued by a number of respondents that GMSF will result in economic leakage. More specifically, Option 2 would harm GM's economy through leakage of local tax revenues and loss of consumer spending. GMSF is being built around a trend based strategy, where GM trains skilled labour and provides a growing workforce but fails to encourage its people to stay. It is argued that these people will migrate away to live elsewhere and contribute to other local economies. They go on to argue that there is a growing local supply of economically active residents, which means the area can be less reliant on inward migrated labour to secure economic growth. The affordability of GM needs to be protected and improved and it should be highlighted as a key economic issue for the area, both for the benefit of attracting inward investment and attracting/retaining employees.

Economic Growth

4.10 Although the growth scenarios are considered in more detail in the Options section of this report there are some points that are worth addressing specifically related to economic growth.

4.11 In relation to the growth modelling there is criticism as to whether the baseline demographic need would provide sufficient workforce to support the Accelerated Growth Scenario. There are a number of 'policy-on' assumptions applied that are not justified as they would only serve to significantly overestimate the potential workforce and therefore underestimate the actual number of people and houses required to provide a sufficient workforce. PopGroup modelling should incorporate the AGS-SNPP 2.8% annual average GVA growth scenario, alongside the AGS-High (3.1% growth) and AGS-Higher (3.3% growth).

4.12 There are two trains of thought that emerge under this theme - one that thinks that proposed growth is too high, and one that thinks that growth rates need to be more ambitious.

4.13 For those that think growth rates are too high, there was felt to be an emphasis on promoting impossible economic "growth" and that there is no recognition of the social and economic diseconomies of "growth". This respondent group regards economic "growth" as undesirable, as they believe it is likely to make the city less liveable, and increase its vulnerability to climactic and geopolitical-economic shocks. The respondents felt that the paper seems to assume that GM must stand out nationally by achieving a very ambitious level of growth, becoming second only to London and the South. They argue that this is at odds with the intention to protect the environment and is a flawed basis on which to base the GMSF.

4.14 For those that think the growth levels are not ambitious enough it is argued that the objectively assessed employment need for GM are based on unsound assumptions. The GMSF is therefore not positively prepared as it fails to fully embrace the pro-growth agenda set out in the Vision by not identifying sufficiently high employment targets over the Plan period. GM is exhibiting strong economic recovery in contrast to the world and other UK cities. It is noted that the 2.8% GVA target is lower than the recent GVA growth achieved across GM (4.2%). The growth rate proposed in the GMSF is below that predicted for London, resulting in the gap between Manchester and London widening (albeit more slowly) instead of closing. It is argued that the premise that GM can never be expected to grow as fast as London is defeatist thinking. The growth potential of GM is underestimated and reference is made to the Frontier Economics assessment that shows that 0.7% per annum is low. Respondents in this group felt that GM is the engine of the Northern Powerhouse and needs to plan for growth at a level close to London (at least 3% GVA per annum) to drive the rest of the region forward. Several respondents argue that the Accelerated Growth Scenarios in Background Paper 2 are more appropriate, and are far too readily dismissed.

- 4.15 The emphasis on past trends was felt to result in an underestimation of the growth potential of GM. The pivotal role that both labour markets and skills play as drivers of economic growth are poorly captured and understood, and that this has led to an underestimation of the level of growth required for economic success.
- 4.16 There were a number of responses relating to sectoral growth. It was highlighted that it is important that a range of opportunities are provided across sectors to provide the desired economic growth. More specifically there is limited reference to Advanced Manufacturing being a key growth sector for the sub-region, even though it has been one of the driving forces of growth in recent years. It is projected that there will be substantial growth in emerging sectors, including innovation and technology, creative and digital industries, and life sciences. This will drive job creation and demand for new, modern workspaces and should be reflected in the plan.
- 4.17 Given the direct correlation between investment in new transport infrastructure and aspirations for economic growth, it was felt that an integrated approach should be adopted by the GMSF.
- 4.18 Assumptions underpinning the economic activity growth rate and issues such as “double jobbing” should be clearly set out. Respondents argue that the background papers make excessively optimistic and unrealistic assumptions concerning the extent to which growth in double-jobbing and economic activity rates account for much of the job growth. They state that the assumptions are also insufficiently justified.
- 4.19 Generally, it was felt that undue weight is given to GVA and productivity as a benchmark of performance. It was argued that quality of life should not be measured solely by GDP per head. Similarly, gross national product (GNP) was argued to be a poor indicator of true progress, not adequately measuring people's sense of wellbeing. Some form of alternative economic indicators or genuine progress indicators should be used as an alternative.

Employment

- 4.20 Respondents noted that GMSF represents an opportunity to address and make explicit reference to the low wage economy, which is such an important economic issue for GM. It should also consider the implications of an older working population in the future.
- 4.21 The majority of consultees believe that GM should be aiming for higher economic growth, which should be reflected in the Objectively Assessed Needs (OAN). As such, consultees believed that the current OAN for economic growth should be seen as a starting point. They do not currently take account of the Deep Dive work, which is yet to be released.
- 4.22 Some argue that the calculation of the employment land requirement is out of date. It does not take account of the need for less employment floor space from people working from home or that less land is required for manufacturing industries due to technological advancements. They therefore believe that the employment land figures are too ambitious and would not realistically achieve Options 2 and 3. Options 2 and 3 are therefore probably based on stronger market conditions that are unlikely to occur over the plan period.
- 4.23 The assumptions about the factors that link housing to jobs are very important but many respondents felt that they have not been sensitivity tested. In particular, the assumed increase in employment rate is very ambitious and includes a significant increase in economic activity for the over 65s, but this might not be realised.

- 4.24 GMSF does not identify the scale of job growth that it aims to deliver and there was some scepticism about the quality of much of the employment land supply that has been identified by the GM authorities. A much more thorough assessment of the quality and viability of this claimed supply is, therefore, required. There was only one comment in this sub-theme that said that employment locations should not only rely on job density data and the number and type of jobs (in absolute terms) in specific locations should be considered.
- 4.25 It was also argued that the GMSF should refer more to culture, cultural infrastructure and cultural wellbeing because they are important elements of sustainable development and planning for future housing and employment needs.
- 4.26 It is argued that the logistics sector will be the key driver of economic growth in the NW and GM, but the GMSF does not recognise this in the text enough, or plan for it under Growth Option 2. For example, the new docks at Liverpool 2 will have a direct impact on GM's economy via Port Salford. Similarly, Airport City is a logistics development opportunity that has started to attract businesses.
- 4.27 Respondents highlighted that there will be substantial growth in other emerging sectors, including innovation and technology, creative and digital industries, advanced manufacturing and life sciences. Infrastructure investment will also drive job creation and demand for new, modern workspace. It was felt that the GMSF needs to do more to plan for these industries. The impact of the growth in these industries is considered in the assessment of GM's economic potential by Frontier Economics.
- 4.28 Many commentators mentioned that it was disappointing that the Deep Dive sector work was unavailable to comment upon and that it should have been made available at this stage.
- 4.29 There is an argument put forward against the assumptions made about key economic sectors, and respondents referred to the work of the Manchester Business School on the Foundational Economy and bringing about a more balanced economy¹.
- 4.30 It is felt that there is a failure to appreciate the criticality of the historic and natural environment assets to the significant tourism sector of the economy. Opportunities for tourism in towns and rural areas on the periphery of GM, including the Peak District National Park should be reflected along with sustainable means of access.
- 4.31 There were a number of specific employment locations discussed within the responses to the consultation, as highlighted below:
- Media City and Salford Quays were argued to rank alongside the commercial core of the city centre as an office location, due to their location and accessibility;
 - Trafford City area (former Trafford Centre Rectangle) was also highlighted as suitable for designation as a strategic mixed-use growth location;
 - Carrington was identified as a location to deliver industrial and warehousing development as it is the largest single ownership development opportunity in GM, consisting of 1,630 acres of former petrochemical plant and agricultural land. The land is strategically located and has the potential to support wider transport infrastructure improvements that could have a significant beneficial impact upon the wider Trafford and Salford area. The land at Carrington could also deliver significant residential development, and as such should be identified as a Strategic Site capable of delivering both employment and housing development;

¹ <http://www.cresc.ac.uk/our-research/remaking-capitalism/foundational-economy/>

- Northbank industrial estate, the west side of Fairhills Road and the Boundary Park industrial area around Irlam and Cadishead should be designated as employment zones;
- Thornham Mill at the end of Oozewood Road, Royton is only partially occupied and is in an area of existing housing but could easily incorporate light industrial use;
- Locations with existing infrastructure should be developed such as between Woodford Aerodrome and Poynton Relief Road;
- Kingsway Business Park in Rochdale can provide a significant amount of jobs; and
- Persimmon Homes considers its sites at West of Irlam (Salford), Chew Moor Lane (Westhoughton) and Langley Lane (Middleton) are located in sustainable locations and represent deliverable development sites.

4.32 More generally the existing and future provision of industrial and warehousing development is biased towards the west and south-west of GM and it is argued that provision should be made in the east and north-east of GM as well.

Skills

4.33 There is general agreement that attracting people into GM and retaining those skilled people are key issues for the future of the area. However, there is no evidence that the skills and needs of GM's residents are aligned with the type of jobs that will be created or that those who are long-term unemployed will come back into work. The extent of the alignment between existing residents and job creation must be carefully and robustly assessed. It is understood that this will be explored as part of the Deep Dives work currently being undertaken by the GMCA, but this work should be undertaken before the key issues and growth options of the GMSF are identified.

4.34 There is endorsement of the role that the Universities play in the growth of the economy, arguing that this can be encapsulated by the enhancement of local businesses and expenditure through critical mass footfall in local areas strategically through the attraction of highly skilled talent who are retained and form part of the workforce.

4.35 It is highlighted that the lack of housing ambition within the GMSF risks creating a situation where companies struggle to recruit and retain talented graduates and more senior employees. There will be a need to attract new business and a new skilled workforce if GM is to truly become a world leading region and that this will require the GMSF to consider the type of housing not only required to meet existing shortages but also to fulfil its economic potential. GMSF is being built around a trend-based strategy where GM trains skilled labour, provides a growing workforce but fails to encourage its people to stay. Respondents argue that these people will migrate away to live elsewhere and contribute to other local economies.

4.36 In terms of evidence it is argued that insufficient analysis is undertaken regarding how planned investment will impact upon jobs growth and labour force supply. The pivotal role that labour markets and skills play as drivers of economic growth are poorly captured and understood.

5. Environment

5.1 This theme looks at general comments related to the environment and includes its representation within the report and its balance with economic goals. Comments related to the more specific issues of low carbon, energy, climate change, pollution, blue and green infrastructure, flooding and water management are also looked at in detail.

Key Messages

- It is considered that the strategy is overly dominated by an economic agenda, with environmental and social factors not being given equal consideration;
- GMSF should make specific reference to synergies between with climate change mitigation / adaptation;
- GMSF needs to strengthen its approach to waste management and the role of energy from waste;
- GMSF needs to acknowledge an increased surface water flood risk through new development;
- There is a lack of clear commitment to addressing climate change within the Vision and ambitions, pointing out that despite climate change is being a crucial factor in their achievement;.
- It is considered that the strategy is overly dominated by an economic agenda, with environmental and social factors not being given equal consideration.
- All parts of the GMSF should recognise the contribution of the landscape as an asset;
- Opportunities for decentralised energy networks and both strategic and community- led energy schemes should be identified and enabled;
- Green and blue linfastructure assets – both individually and as a strategic network – are important, as are their role in people’s physical and mental wellbeing.. ;
- Inadequate reference is made to poor air quality. and that the credibility of the GMSF is reduced through contradictory statements, where it suggests addressing air quality issues is a priority and yet discusses is reduced by contradictory statements relating to increased air travel and more road building;
- It should be recognised that heritage assets are an important element of green infrastructure as they generally preserve both cultural and historically significant assets;
- Major environmental improvements are needed to enhance the function and ecological quality of GM river corridors and investment into upstream catchment areas.; and
- Addressing flood risk in GM requires a multi-agency cross-border approach.

General

- 5.2 It is considered that the GMSF's stated Vision and Ambition needs to go further on environmental considerations and social assets, setting out an intention to ensure provision of high quality multifunctional greenfield and public realm as well as encouraging and supporting healthy communities. Some consider that the Vision is unclear in terms of the purported environmental aspirations of the GMSF. It is considered that the Vision should include indicators of health, wellbeing, quality of life, poverty, pollution, environmental degradation and democratic empowerment. The Vision should also recognise the need to improve understanding and enable the positive contribution of historical, cultural and natural assets.
- 5.3 There is a fairly widely held view that environmental considerations need better integrating into all parts of GMSF. In particular, it was felt that the options consultation was unbalanced in favour of economic growth over community, social and environmental impacts, benefits, constraints and opportunities. A number of comments referenced the need to strengthen the GMSF with regards to the environmental factors identified by the Integrated Assessment. The GMSF should also be strengthened by referencing the key roles of historic and environmental assets, such as those relating to health, education, carbon reduction, energy creation, flood risk and air quality.
- 5.4 There is a consideration that development should be focused in locations that have existing infrastructure capacity and will ensure the lowest negative impact on the natural environment (or greatest scope to enhance it). This should follow a sequential approach, as it is necessary to have a fully informed understanding of environmental capacity to inform judgements and secure sustainable development. Some respondents argued that environmental assets, at a strategic scale, should be considered as one of the key strategic issues that GMSF identifies. There is support for a framework to safeguard and enhance a high quality natural and built environment, but also recognition that there needs to be more detail on how this will be achieved. At the same time there were suggestions of the need to set raised standards of environmental policy and management.
- 5.5 Many comments focused on the importance of both safeguarding and enhancing the natural environment as well as the countryside and urban greenspace (especially that which is valuable for recreation). It is noted that if considerable change is to be brought about, then it must not be allowed to result in environmental damage – where environmental damage has occurred historically it has commonly afflicted low income and minority communities. The historic influence of humans on the natural environment needs to be recognised. A number of comments suggested that there is conflict between the various issues GMSF purports to be addressing and the suggested options - for example between air quality and climate change issues and the use / expansion of strategic highway networks. There is some concern that existing safeguards might be weakened or lost.
- 5.6 Some consultees set out a view that environmental protection should not await economic growth and that protection of habitats and species needs to be seen beyond the perspective of benefits to businesses and residents. There is considered to be a need for clear evidence of the value of environmental assets and a greater focus on the environment in its own right.
- 5.7 A wide range of other general environment-related comments were made, including:
- The GMSF should consider food security and the protection of the best and most versatile agricultural land;
 - Advocating of localised economies and production;

- The need for regard to land stability, the non-sterilisation of mineral resources and hazards arising from disused mineral workings in assessing potential site development capacity;
- The value of the environment to the visitor economy and as an attractor of people;
- The need to protect countryside for its own sake;
- The environmental benefits that will likely arise from HS2 (such as enabling redevelopment of previously developed, or 'brownfield', land);
- The conflict between environmental protection and green belt release;
- The need for quality of life elements and health benefits of environmental factors to be given a higher profile;
- The need to consider cross-boundary effects and implications;
- The impact of ecological constraints on development delivery; and
- Support of the emphasis given to the contribution of rural areas.

Landscape

5.8 It is considered important that all parts of the GMSF recognise the contribution of the landscape as an asset that should be safeguarded and enhanced, with development being focused in locations that have the least adverse impact upon it. The options consultation is considered to not go far enough in this respect.

5.9 There is support for undertaking of an assessment of landscape quality and a suggestion that this be incorporated into a wider ecosystem services assessment. Wider referencing (than just Background Paper 4) of Natural England's National Character Areas is considered to be needed.

Low Carbon

5.10 It is considered that GMSF needs to set a framework to actively reduce carbon outputs beyond simply looking out for 'low carbon opportunities'. More information is requested in terms of how GMSF will deliver a low carbon economy. In particular:

- Opportunities for decentralised energy networks and both strategic and community-led energy schemes should be identified and enabled;
- There should be low carbon investment in the existing housing stock;
- New housing should be required to be zero-carbon; and
- Details of standards expected of developers should be provided.

5.11 Additionally it is considered that the GMSF needs to have better regard to factors identified by the Integrated Assessment and needs to recognise the role of land as a carbon sink, for climate adaptation purposes and for water / flood management. There is a further need to recognise the potential of mixed-use development in delivering spatial objectives as well as reducing carbon emissions and congestion.

Energy

5.12 It is considered that although the GMSF rightly identifies climate change and flood risk as key issues for GM, especially with the projected growth potential, it still requires a strategic approach that refers to evidence gathering and policy formulation on historic environment, landscape and natural resources, including unconventional gas. A Sustainable Energy Action Plan (SEAP) is suggested as a strategic planning and energy mechanism to coordinate activities, Local Plans and strategies. This is something that the Town and Country Planning

Association are promoting through the European SPECIAL (Spatial Planning and Energy for Communities in All Landscapes) project.

- 5.13 National energy policy encourages production and use of indigenous natural resources to become self-sufficient in energy production. The GMSF should seek to align with this by including a policy to cover all hydrocarbons potentially found in the area - and which could be extracted over the plan period - to be licenced by the Department of Energy and Climate Change (DECC) under the Petroleum Exploration and Development Licence (PEDL) regime. It has been separately noted that the proposals map should safeguard PEDL areas to ensure land use proposals take account of PEDL rights. Other consultees, however, request that GMSF be explicit in opposing 'fracking'.
- 5.14 It was also proposed that the GMSF should take advantage of opportunities for renewable energy afforded by the canal network through biomass capacity; the reuse and recycling of energy through the waste market; and heating and cooling purposes through thermal energy of the canal water. Consultees also reference the need for discussion around renewable energy generation in the southern Pennines.
- 5.15 It was suggested that a reduction in energy demand is the first step toward better efficiency. This would then be followed by an increase in energy supply through renewable projects, incorporating, where possible, local energy generation. Community energy schemes should be encouraged through neighbourhood plans, including encouragement for onshore wind, ground mounted and rooftop solar PV schemes. This is because local generation for local consumption can help to reduce the wider environmental impact of global transport. It is widely considered that new houses should be built to improved energy efficiency standards, and that existing houses should be retrofitted with energy efficiency measures where practicable. More detail is needed in the GMSF on incorporating low carbon techniques in new development and regeneration; renewable energy generation to achieve the ambition for a low carbon economy; improved energy security; and a reduction in fuel poverty. This should also be emphasised in the Vision and Ambition section of the document.

Climate Change

- 5.16 A number of consultees commented on the lack of clear commitment to addressing climate change within the Vision and Ambitions, pointing out that climate change is a crucial factor in their achievement. There is clear support for using GMSF as a tool to deal with climate change and for cross-references to the GM Climate Change Strategy Implementation Plan.
- 5.17 It is suggested that the Vision and aims of the framework should specifically reference the target of reducing carbon emissions by 80% by 2035 and being on track to be zero carbon by 2050, reflecting international agreements to limit global temperature rises.
- 5.18 A number of consultees focus on climate change resilience. In particular, it is noted that the GMSF needs to seek to bring about resilience across GM, not just aim to ensure new development / growth is resilient. It is specifically suggested that the ambition should include text setting out what a resilient GM will look like:
- 'By 2035 GM will: have integrated a network of high quality and multifunctional green and blue infrastructure into our towns and cities: with improved access by everyone for individual health and wellbeing; designed and maintained to create climate resilience; used by communities and industry for transport, leisure and food growing opportunities; and funded by a wide range of beneficiaries from the public and private sectors.'*

- 5.19 Comments also focused on the linkages between GMSF, climate change, transport and the need for integration of and mutual support between relevant strategies. There appears to be a widely held view that, presently, climate change strategy and goals are incompatible with transport growth, especially growth in road transport and aviation. Transport and economic growth must meet needs without increasing global warming emissions, pollution or environmental degradation.
- 5.20 Many comments focused on fairly detailed elements of climate change mitigation and adaptation. Priority should be given to approaches that address both mitigation and adaptation, such as green infrastructure (especially within urban areas), local food production and upland landscape restoration.
- 5.21 The potential for use of land for carbon sequestration and flood management was raised and there was support for climate change and flood risk being identified as key issues that the GMSF needs to commit to addressing. Specific reference was made to the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) and the need for GMSF to provide a strategic context for the ten districts to meet legal requirements on the inclusion of climate change mitigation / adaptation policies within their development plans. Mention was also made of the B-Lines Project being undertaken by the charity "Buglife", which aims to identify, protect and create routes for pollinator and insect dispersal in response to climate change.
- 5.22 Several consultees focus on the disruptive impact of climate change to the global economy. It was highlighted how climate change mitigation / adaptation activities might provide economic growth opportunities but also that climate change is a threat to food production and security, which in turn has a detrimental economic impact.
- 5.23 It is suggested that references in the options paper to the GMSF theme of seeking health improvement should be extended to make references to the impact of climate change on health, particularly in relation to vulnerable groups (reference to paragraph 3.45 in particular).
- 5.24 Quite a number of consultees highlight apparent contradictions or conflicts within the emerging strategy. In particular, it is considered that the strategy is overly dominated by an economic agenda, with environmental and social factors not being given equal consideration. It is suggested that there needs to be recognition of the impossibility of realising a low carbon economy and meeting climate change goals alongside economic growth. There was also a suggestion that the growth rates set out in the options are incompatible with meeting international obligations on climate change.

Pollution, Air Quality and Noise

- 5.25 In focusing on matters relating to air quality, consultees argue that Air Quality Management Areas (AQMAs) should not preclude the allocation of land for development. It is pointed out in particular that woodland adjacent to the motorway network can provide air treatment buffers to potential development sites and that work to improve air quality should be continued with Highways England in locations including Trafford Park, the Trafford Centre, Port Salford, Heywood and the M60 Corridor. It is suggested that there is a need to recognise the linkages between air quality and poor health.
- 5.26 There is a view, however, that inadequate reference is made to poor air quality. Additionally, it was felt that the credibility of the GMSF is reduced as it suggests addressing air quality issues

while simultaneously contradicting this with statements relating to increased air travel and more road building.

- 5.27 A number of comments reference pollution, but generally in the context of air pollution and the role of blue / green infrastructure in its mitigation. No comments were received that make reference to issues relating to noise.

Blue and Green Infrastructure

- 5.28 The GMSF should reference the quality and multi -functionality of green infrastructure as a network. It should be defined by the river valley network that cuts across district boundaries. The waterway corridors across GM should be used to provide the opportunity to improve connectivity both within and between the city and town centres and beyond.

- 5.29 It should recognise that green spaces in urban areas can be equally important in different ways as the greenfield in rural areas. The GMSF should also recognise GI as a cross-boundary issue with strategic green infrastructure located beyond GM. This is crucial to reducing flood risk in the city region.

- 5.30 Further work is needed to identify what is an 'important green and blue asset'. A range of site types should be identified (e.g. sporting opportunities both formal and informal, allotment, cemetery to garden etc.). Heritage assets are also considered an important element of green infrastructure as they generally preserve both cultural and historic significance and can often also have natural significance.

- 5.31 GI assets also need to be recognised in their own right (e.g. biodiversity, flood risk, food production). However, it is also considered reference to GI as existing assets fails to recognise the inter-related nature of such infrastructure and the necessity of treating it as a whole. By doing so GM can ensure that all parts work for the wider benefit of the conurbation overall.

- 5.32 In terms of the role of GI, it should form part of a wider approach to mitigating and adapting to climate change, flood alleviation, relieving air pollution and water flow management. Its role in people's physical and mental health and wellbeing is also important. It has the potential to increase the use of sustainable transport modes, thereby improving air quality, lowering carbon dioxide levels and reducing congestion on roads. GI has the ability to give a local identity and sense of place, reducing fragmentation of the ecological networks. It is also important to identify where new GI sites are required - for example, in areas deficient in quantity, function and quality of GI. This provides the opportunity to enhance existing assets. Also questioned is what Eco System Services the GI is providing.

- 5.33 More widely, GI would contribute to the tourism and leisure sector against a range of different objectives, and an assessment such as in the Manchester Green and Blue Infrastructure Strategy should be completed for Greater Manchester. Opportunities for improvements to the water environment (blue infrastructure) are also possible, and should be more explicit in order to align with the Water Framework Directive objectives. It should be noted canals and rivers have very significant differences in terms of their characteristics, role and function. This will require very different policy approaches. GMSF should also make greater use of standards such as Woodlands Access Standards and Accessible Natural Greenspace Standards - ANGSt (Natural England).

5.34 In the *Ambition* section, there should be a statement that economic growth will be accompanied, wherever possible, by protection and enhancement of environmental assets. It should also state that damage to irreplaceable semi-natural habitats, such as ancient woodland, will be avoided other than in the most exceptional circumstances.

New Development

5.35 An increase in the number of houses also increases the pressure on open space and leisure facilities and this should not result in overcrowded places with poor quality outside space due to the density of housing. For future sustainable development it is important everyone has good quality green spaces near to their homes, that there are coherent ecological networks, with more and better quality places for nature, for the benefit of people and wildlife. Local residents should be consulted on green spaces to understand how the space contributes to local people.

5.36 Sites identified for protection for conservation or biodiversity purposes will not be deliverable for development particularly the loss of irreplaceable habitat, or where mitigating measures can be put in place. However it is also considered that GI should only be used as a constraint to development when it serves a strategic purpose and is demonstrably required to continue to be protected. This should be based upon an up to date assessment of open space needs and the degree to which they need protecting some may need to be lost to meet the targets of the GMSF. The alternative loss is of green belt land, which should be a last resort.

5.37 Green belt land offers opportunity to deliver significant environmental and recreational enhancements to green and blue infrastructure on the urban fringe, which currently affords little public access and contributes little to the quality of the recreational "offer" of GM. Other opportunities could be via a "Parkland" model whereby new and enhanced GI are linked to and facilitated by new development. There is also the potential increased tree planting and woodland creation as a result of new development.

Flooding and Water Management

5.38 The importance of green infrastructure for flood risk management has been highlighted by a high number of consultees. The retention of green spaces, trees and hedgerows are also acknowledged for reduced pluvial flooding and relieving air pollution. It is also suggested that land use as a carbon sink for climate change adaptation and flood management is referenced within the framework. Research by Mersey Forest and the University of Manchester indicates green infrastructure lying beyond the GM boundary is crucial to reducing flood risk in the city region.

5.39 Flood risk and flood plains, though a recognised high priority constraint, do not necessarily indicate an inability to accommodate development. Instead, they indicate a need for proper flood risk management to avoid significant economic, social and environmental damage. It is suggested that in light of recent flooding and the impact of climate change that a more proactive approach is needed toward implementing realistic flood risk scenarios; analysing river catchment and capacities; protecting existing and future properties from flooding; for policies to recognise these issues; and for policies to ensure that flood risk appraisals and avoidance measures are up-to-date and meet present day challenges.

5.40 In terms of water management, it is suggested that major environmental improvements are needed to enhance the function and ecological quality of GM river corridors for both quality

and hydro morphology. Additionally, investment into upstream catchment areas to manage and slow water flow is essential for mitigating future flooding.

5.41 It is considered by some consultees that a rethink is needed on UK flood defence, including improving warning systems, waterproofing and protection of homes. In line with this, it is widely considered that properly addressing flood risk in GM requires a multi-agency cross-border approach with potential endorsement of intervention beyond GMCA territory, where necessary, to address critical flood risk issues. This is further demonstrated by the aforementioned Mersey Forest and University of Manchester research.

5.42 While the inclusion of flood risk reduction action and the focus on mitigation is supported, it is considered that further emphasis is needed in the GMSF on: fluvial flood risk as being significant to GM; the role of nature in flood mitigation; and flooding as a significant climate pressure. It is suggested that the section be widened to “Flood and Water Management” and that strengthening of the section is necessary with a presumption against development of flood risk areas. A reference to applying a sequential approach to growth rather than the current catchment based approach is also suggested.

5.43 It is noted that the Water Framework Directive objectives should be more evident in the GMSF as it plays an important role within the key ambitions for GM.

5.44 It is widely acknowledged that new development should manage surface water run-off in a sustainable and appropriate way and that developers should look at ways to incorporate an element of betterment within their proposals. This approach is in accordance with paragraph 103 of the NPPF. It is also acknowledged that flood risk will inevitably impact on deliverability and that areas resilient to climate risks are more desirable for living, working and investment. As such it is crucial that developers work toward sustainable flood risk management schemes.

5.45 United Utilities recommend and suggest the following detailed policy on surface water management:

“Surface water should be discharged in the following order of priority:

- An adequate soakaway or some other form of infiltration system.*
- An attenuated discharge to watercourse.*
- An attenuated discharge to public surface water sewer.*
- An attenuated discharge to public combined sewer.*

Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. On Greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.

Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces. The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A

discharge to groundwater or watercourse may require the consent of the Environment Agency.”

5.46 They also suggest a detailed policy regarding water efficiency measures and the design of new development as follows:

“The design of new development should incorporate water efficiency measures. New development should maximise the use of permeable surfaces and the most sustainable form of drainage, and should encourage water efficiency measures including water saving and recycling measures to minimise water usage.”

5.47 There are a number of methods that developers can implement to ensure their proposals are water efficient, such as utilising rainwater harvesting and greywater harvesting. Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for treatment and pumping of both clean and wastewater. It is also suggested that where practicable the water management processes seen in canals (controlled weirs / sluices) may provide an alternative and sustainable opportunity for surface run-off from new development.

Biodiversity

5.48 Climate resilience has been referred to throughout the comments received during the consultation. It is noted by a number of respondents that by building on climate resilience there is an opportunity to better support health and wellbeing, economic growth and biodiversity conservation. In line with the need to create a resilient landscape, it is suggested that there is a need to identify the most important areas and establish a hierarchy of priority for protection through the plan with European designations and other land management designations (e.g. Environmental Stewardship areas) included, as they are not at present. It is also suggested that more detail is needed on ecological assets and that a change in the way that ecological designations are carried forward with all existing designations being reviewed before being carried forward. Further protection of irreplaceable ancient woodland, restoration of woodland and addition of new diverse woodland would assist with resilience. A strategic coordinated approach to addressing invasive species is also vital to encouraging resilience, especially in river valleys.

5.49 The connection between the natural environment and economic growth was recorded by several consultees with a reference made to the recognised value of green infrastructure to economic growth in London demonstrated in the document *“Natural Capital: Investing in a Green Infrastructure for a Future City”*. It is suggested that a large number of small urban extensions will have a lesser impact on the character and biodiversity richness of sites. It is also suggested that city region-wide standards for biodiversity, given the mobile nature of habitats and species, will alleviate environmental pressure and encourage economic growth on that basis.

5.50 The opportunities and constraints noted in the GMSF are not considered to be thorough enough, especially as the Integrated Appraisal shows that biodiversity needs to be strengthened. The need for GMSF to identify biodiversity designations of national or international significance is raised. It is suggested that the ambitions section should note that economic growth will be accompanied by protection and enhancement of environmental assets and damage to irreplaceable semi-natural habitats (ancient woodland) will be avoided other than in the most exceptional circumstances.

5.51 A range of other key documents were suggested for the GMSF to consider and/or align with. These included:

- GM Biodiversity Project
- GM Ecological Framework
- GM Green Infrastructure Framework
- The Lawton Principles, Government White Paper for Nature (2011)
- The Government's proposed 25-year Plan for Nature
- The UK Ecosystem Assessment (2011)
- Nature Positive Local Plans (RSPB/Wildlife Trust, May 2015)
- Biodiversity 2020 Strategy (Defra 2011)
- Natural Environment White Paper (Defra 2011)
- Making Space for Nature (Defra 2011)

6. Housing

6.1 There are a number of sub themes within this section related to housing. These range from general broad themes of the housing requirement of GM, tenure mix, housing delivery, affordability and locations, to more specific housing issues related to particular groups such as older people, students and gypsies and travellers

Key Messages

- A shortage of housing is the key constraint to quality of life across GM;
- There is an over-reliance on middle- to high density development in the inner core;
- GMSF is too focussed on the number of new homes needed and no consideration is given to size, type, and tenure of this requirement;
- The type and location of new housing is critical to securing economic growth and tackling constrained labour mobility;
- GMSF does not make the fundamental linkages between housing and sustainable economic growth;
- The document does not make enough reference to the relationship between transport infrastructure and development;
- GMSF overlooks the health problems associated with a lack of appropriate housing provision;
- There is a clear role for GMSF in design and housing standards;
- There is a need to address the criticisms of the OAHN modelling of demographics and the economy;
- There is an over-reliance on past trends and outdated growth assumptions;
- It is not just about new homes, it is also about the repair, renewal and replacement of existing homes;
- Urban extensions should be considered;
- There is concern with delivery that the current supply is not viable and needs a comprehensive review;
- The GMSF needs to reference housing construction and its economic impacts on local amenities via construction, labour and to local amenities
- The assessment needs to reflect the consequences of past under delivery of housing; and
- Future delivery needs to attract households to the northern districts of GM to balance growth and redistribute supply.

General

- 6.2 A shortage of housing was highlighted by the respondents as the key constraint to quality of life across GM. A significant boost in housing supply of the right type and quality in the right locations is critical to reverse the outward migration of the most economically active population of GM and achieving sustainable communities and growth. Quickly reallocating land for housing should be a priority. Too little housing will affect affordability and will fail to provide support for the necessary labour market.
- 6.3 The housing target cannot be met on the current identified housing land supply for GM - the shortfall equates to around 64,550 units. It is noted that adjoining areas, such as Chorley are unable to provide any deliverable housing sites within their borough that could contribute to meeting any housing shortfall identified in GM.
- 6.4 Questions remain amongst respondents about the suitability of some of the land allocated for housing. The figure of 152,784 ha. total housing land requirement is accepted with little analysis of whether the sites are viable or still suitable for residential use. There is a large concentration of sites in the city centre and a heavy reliance on sites in weaker value areas, posing major questions over whether the market will support the development of these sites.
- 6.5 Whilst densities could be increased to avoid development in the green belt, there is an over-reliance on medium-high density development in the inner core. At the same time, sites to accommodate lower density, family or aspirational housing are very limited, particularly in higher demand market areas. GMSF suggests a higher proportion of new homes would need to be apartments, yet areas outside the city centre and in the periphery of GM would be unsuitable for such high density development to deliver Option 3 in respect of demand and depth.
- 6.6 In terms of housing type / mix, Peel agrees that a broad distribution of dwelling types is required across GM. However, GMSF is too focussed on the number of new homes needed and no consideration has been given to the size, type, tenure and range of housing required. The ambition for new housing needs to reference affordability, variety, choice, mix, quality and place.
- 6.7 Revitalisation of the city centre has helped to retain groups more centrally over the last decade. When such groups start to have families, they are typically looking towards the south of the city for their housing needs. If the needs of all demographic groups are not met, this will result in an undesirable migration trend of a skilled, educated and talented workforce moving out of the city region. The type and location of new housing is critical to securing economic growth and tackling constrained labour mobility. It is essential that family-sized and aspirational housing is provided in locations of high demand in the out-lying areas of the city region. This should particularly be in the southern and north-western housing market areas in order to help retain and attract the most economically active people.
- 6.8 A general point raised is that the GMSF does not make the fundamental linkages between housing and sustainable economic growth. Any housing development must make a strong commitment to sustainable development to ensure the creation of mixed-use areas. This needs to be a priority to help reduce car-commute trips. Greater reference is also needed to culture, cultural infrastructure and cultural wellbeing as an important element of sustainable development.

- 6.9 It is argued that the document does not make enough reference to the relationship between transport infrastructure and development, regeneration, housing needs, location, viability and place-making. Furthermore, it is better to create entirely new settlements as the gradual expansion of existing settlements does not allow for infrastructure capacity to be improved at all or sufficiently.
- 6.10 There is disappointment expressed that GMSF completely overlooks the health problems associated with a lack of appropriate housing provision. Shelter has published numerous reports on this topic and the issues identified should be considered within the health section.
- 6.11 GMSF is seen to have a clear role in design and housing standards and this includes a sufficient commitment to ensure the repair and renewal of existing homes. There is also opportunity to develop new financial instruments and loan products which enable home owners to release part of the equity in order to repair and renew their homes. GMSF needs to recognise that in some neighbourhoods design quality, quality of homes and quality of infrastructure are poor. The decline of existing neighbourhoods will mean expensive public intervention will be required in the absence of property owners investing in maintenance and improvement.
- 6.12 There is also some support expressed in recognition of a growing private rented sector of the need for the introduction of landlord licensing, which could be GM-wide, to help improve the quality of the housing offer and that this could also help to improve energy efficiency.
- 6.13 Many of the responses to the GMSF focussed on the overall housing numbers in the plan. Feedback focussed on the overall methodology to develop the housing numbers, the delivery of housing and the mix and tenure of developments.

Objectively Assessed Housing Need (OAHN)

- 6.14 A number of criticisms are put forward of OAHN within the GMSF. They focussed on the following demographic modelling issues:
- The use of the ten year migration rates and international migration rates;
 - Household formation rates and queries about why the 2008 household formation rate is not used. The respondents argue that using the 2012 rate suppresses 'normal' household formation;
 - Explanation of why the forecasts change international migrations flows after ten years from SNPP to ONS levels;
 - Unattributable Population Change (UPC) needs to be reviewed and analysed again.
- 6.15 There were also a number of issues related to the economic modelling and how it is used in relation to the GMSF. The following queries were made by the respondents:
- What is the role of the economic downturn from 2008 in the economic projections and how is it included in the projections?;
 - What are the roles of the different economic projections produced?;
 - How did the modelling use GVA figures, and which ones were correct?;
 - How does improved economic performance link to the modelling, showing leads to domestic outflows from GM?
 - Which policy scenarios achieve the Northern Powerhouse objective?
- 6.16 It is suggested that the GMCA should commission objective and independent forecasts of the economic potential of the city region. This should then be used to evidence demographic and socio-economic trends and identify the full objectively assessed need for housing and

employment land in GM. The Deep Dive work is awaited, and without its findings informing the options the Strategic Options document is flawed.

6.17 Feedback was also received regarding household type and the delivery of housing, which are outlined below:

- How to ensure GM is attractive to working households who cannot access the type of good quality housing they aspire to in GM;
- The need for GM to analyse housing numbers at a lower housing market area than GM. Some advocate for individual districts to be treated as HMAs, while others put forward four areas which are discussed in the area of assessment section;
- The need to develop an SHMA for GM;
- The need to review the current housing supply, as some argued that housing need would not be met if it is used;
- The OAN is focused heavily on delivery of homes for one and two person households. The respondent argued that this virtually ignores the issue of whether a greater range and choice of family housing is needed.

Housing Requirement

6.18 It is argued that the approach used to identify levels of housing and employment land is overly influenced by past, outdated growth trends and assumes only modest levels of growth in jobs, investment and population. Past trends in housing delivery in the case of GM are not a robust indicator of the housebuilding industry's ability, or desire, to deliver an upsurge in housing to meet demand. Respondents argue that current housing market indicators should be reviewed as opposed to looking at past trends.

6.19 The existing identified supply of 152,800 net additional dwellings is questioned. Respondents sought more information about these figures, in terms of size of site, planning status, location, greenfield / brownfield, etc.

6.20 Some argue that overcrowding and the number of concealed families has worsened. Background Paper 3 puts this down to a lack of larger properties. The respondent argued that this assumption is justified by ethnicity without further explanation. This does not negate the need to consider an adjustment to account for lack of supply of larger houses. GM authorities have under-delivered against housing requirements for a significant period of time so the under-delivery will have affected the household projections.

Vacant Dwellings/Empty Homes

6.21 It should be recognised within the plan that the commitment to provide housing is not just about building new homes. It is also about ensuring the repair, renewal and replacement of existing homes in some areas. It is argued that, where appropriate, the use of existing buildings and properties should be maximised such as flats above shops and through subdivision.

6.22 However, the GMSF must be explicit in recognising that past unmet demand and the future housing needs of the city region cannot all be met through the redevelopment of previously developed land or the re-use of vacant buildings within the urban areas.

Housing Delivery

- 6.23 It is argued within the representations that what is needed is a more flexible and imaginative approach to identifying development sites to meet housing delivery requirements. For example, flats over shops and other commercial property may be suitable for housing use. The division of existing large houses into smaller residential units could be promoted.
- 6.24 Respondents also argue that the plan does not look at types of housing in enough detail and more focus should be placed on family housing.
- 6.25 Some respondents argue that urban extensions should be considered as they will be the only way to meet the growth that GM is planning for. Some of these respondents also put forward sites for urban extensions as part of the 'Call for Sites' process.
- 6.26 However, some were against urban extensions and suggest that any decision on housing outside of the existing urban area should be informed by a robust evidence base, including the findings of the Green Belt Assessment, transport evidence base and any associated infrastructure delivery planning work. The need for flexibility is crucial given the serious under-delivery of housing across the city region in recent years and the length of time it has been since the last review of the green belt across GM.
- 6.27 A further proposition for delivery was rather than attempting to bolster failing town centres, it would be better for there to be a policy of turning over peripheral retail areas which are unlikely to be resuscitated to housing. The more housing there is in town centres, the more likely the remaining retail outlets will succeed. In relation to this there should be a review of all retail centres to establish where there are peripheral areas that could be changed over to housing. Similarly, where there are failing out-of-town centres, they should be assessed for conversion to housing.
- 6.28 In terms of housing delivery, some argued that there is a need for GMSF to be realistic when establishing how quickly developments will be completed in GM and recognise that markets vary across the region.
- 6.29 Linked to delivery was a concern that some of the current supply is not viable and therefore work needs to take place to review it to ensure GM has enough sites. Others noted a concern that the GMSF appeared to rely too heavily on city centre development and that other areas should be considered. This consideration needed to also look at the overall GM housing market, with some respondents arguing that some areas of GM are far stronger than others. In this respect, they wanted clarity on how areas with weaker markets should be supported through the GMSF process.
- 6.30 Linked to development was a concern from some groups that the levels of development that GMSF proposes would impact on transport infrastructure, and this needed to be looked at in more detail.

Affordable Housing

- 6.31 To understand the housing needs across GM, a SHMA compliant with PPG and NPPF is required, as following judgement on the recent case against Warrington BC. In this case, it was clarified that affordable housing need comprises an integral element of the OAN rather than a discrete element. It is not acceptable for affordable housing needs to be dismissed on the basis of government statements in relation to starter homes.

6.32 District SHMAs have continued to identify affordable housing needs. Without analysis it is impossible to identify what the level of housing need may be and what uplift may be required. This critical flaw in the evidence base is contrary not only to the PPG but also to recent High Court judgements. In response to the worsening affordability issues, it is considered that uplift to the demographic starting point in the order of 10% would be justified.

Student Housing

6.33 The role of student housing on the economy and housing market as a whole is highlighted in the comments, with its role in releasing other market housing on to the general market, such as HMOs to family housing. Purpose built student accommodation could help alleviate some supply issues and fulfil the strong demand for higher quality university product amongst international and post-graduate students thus stimulating further investment. Although there is permission on Oxford Road for significant numbers of luxury serviced apartments, for international students this would not directly compete with the future delivery of the Universities' own accommodation needs. It is clear there remains a capacity and requirement to sustain the University product via purpose built student accommodation.

6.34 It is argued that the GMSF needs to include delivery of a wide range of new purpose-built student housing within local markets. There is a requirement to attract and retain talent to University institutions in the Greater Manchester area. This can be successfully achieved through the availability and range of high quality purpose-built student accommodation that can attract a variety of students.

Older Persons Housing

6.35 A number of comments felt that the GMSF has not sufficiently considered the needs of older people and will not provide policies to meet those needs. An assessment of the scale of this type of housing is required.

6.36 The scope of the GMSF should include co-ordination of health and social care functions and funding. It could be argued this is not a matter for the GMSF, but when this comparator is considered in the context of mortality comparators, the need for better older persons / supported care and accommodation, for example, it is clear these should be major considerations.

6.37 Specialist accommodation for the elderly will have a vital role in meeting the areas housing needs and therefore commend the commitment in paragraph 3.48 of the GMSFGMSF to meeting the diverse housing needs of older people. As a result funding for this type of housing needs to be available.

6.38 National guidance emphasises the need for new housing to meet demographic needs, with particular reference to the growing number of older persons. Unless the increasingly ageing demographic profile across GM is properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives.

6.39 It is suggested that the focus for the mix of housing built should reflect both the needs of the 65-74 age group as well as attracting them to look at downsizing. A suitable home would be one that is well designed so all would then be adaptable and healthy for all ages. It needs to be also recognised that some older people may wish to move to the more central

neighbourhoods to take advantage of leisure, cultural and civic facilities. For this to be an option, the quality of the building and in particular space and access are more important.

Housing Locations

6.40 There were a number of site specific comments within the Options consultation document that had already been submitted in the 'Call for Sites' exercise. This will not be discussed further here but there are a few broad points raised that are relevant to this report.

6.41 It was highlighted that the GMSF should refer to HS2 and the regeneration of Piccadilly, in accordance with the HS2 Manchester Piccadilly Strategic Regeneration Framework, in the same manner that Manchester International Airport and Port Salford are referred to within the GMSF. It is considered that the regeneration of this sustainable location will act as an important component of meeting identified residential and commercial need in Greater Manchester.

6.42 Canals were highlighted as a catalyst for the development of property alongside them, and this is particularly evident at the present time in Manchester with increasing interest in the development of sites in proximity to the canals. Canals help to establish developer and investor confidence, particularly in disadvantaged areas. Improvements to canal environments have been shown to bring forward the development of previously vacant or underused sites. Their linear form means that canals can also help integrate discrete development schemes.

6.43 Generally it was felt that the GMSF should seek to release those sites within the most sustainable locations that are considered the most likely to be delivered. This will help to ensure actual delivery within the Plan period, and provide an appropriate balance of brownfield, greenfield and scale.

6.44 The density of development has to reflect the character of the area, so what is suitable for the city centre Manchester has to be distinguished from suburban areas. The land take suggested maximises the opportunity of the housing units required being delivered on-time. It would not be acceptable for the over-provision of apartments within the inner-area to outweigh the need to provide family-sized housing elsewhere.

6.45 It will be important to attract households to the northern districts of GM to balance growth and redistribute supply. Smaller urban extensions will be required to address short term needs (1-5yrs.). Major urban extensions will be required for the medium to long-term (5-20yrs), complemented with further smaller urban extensions over the same period. Additionally, a new settlement may also complement the major urban extensions but will have a longer lead-in, so delivering in 8-20 years.

6.46 There were concerns cited that the perception of the south of conurbation having a stronger housing and employment offer will attract young workers to that area, compounding existing affordability and density issues. A quality housing and neighbourhood offer in Rochdale and other areas north of the city centre is critical to retaining the benefits of growth within GM, It is also crucial in reducing the risk of neighbourhoods becoming a drag on growth, and therefore using increasingly disproportionate levels of scarce public resources.

6.47 It is argued that the opportunities for the co-location of new homes and jobs in sustainable, urban extensions with access to new and existing local services, community and retail facilities is a significant opportunity that should be considered within the GMSF. This would

also provide the opportunity to commute to work and undertake business more conveniently. The regeneration benefits arising from urban extensions to existing settlements is an extremely important opportunity that should not be under-valued.

6.48 It was stressed by the majority of responders that any new development should have adequate regard to infrastructure capacity and in particular to public transport. It was generally a criticism that the GMSF does not make enough reference to the relationship between transport infrastructure and development, regeneration, housing needs, location, viability and place-making.

Gypsies and Travellers.

6.49 The GMSF does not acknowledge the need to equally meet the accommodation needs of Gypsies and Travellers. It is argued that the document is tellingly absent of any reference to meeting the distinct needs of Travelling Show people. The document only refers specifically to housing assessments that do not include the travelling community.

6.50 The GMGTAA recommends that new transit provision for 59 transit pitches should be spread across the study area's ten local authorities (six in each local authority).

7. Place

7.1 This theme relates to comments with a particular geographical element such as the city centre, regional centre or town centres. This section also includes comments related to land use policy such as green belt, sustainability, greenfield and brownfield land. There are also sub-themes within this section that look at particular elements of what makes up a sense of place, such as through design quality, critical infrastructure, the historic environment, development viability and regeneration.

Key Messages

- Place-making issues are not given sufficient strength and importance in GMSF;
- There needs to be clarity around what sites are strategic and non-strategic;
- Establish a more detailed evidence -led network or hierarchy of centres;
- There should be more reference to the city centre as a key driver of regional economy ;
- There should be more reference to town centres as key drivers of their local economies and there was general support for the town centre first approach;
- Media City and Salford Quays should rank alongside the commercial core of the City Centre as an office location due to its location and accessibility;
- The existing and future provision of industrial and warehousing development is biased towards the west and south-west of GM. Provision should be made in the east and north-east of GM too;
- Respondents recognised that it was likely that not all development would be on brownfield land and argued that brownfield sites should be complemented with new settlements and sustainable urban extensions;
- Re-use existing buildings and previously developed land prior to greenfield land; and
- The release of green belt land which is otherwise unconstrained should be prioritised ahead of the development of non-green belt land which would result in significant environmental harm.

General

- 7.2 Place-making issues are not given sufficient strength and importance in the GMSF, particularly culture, retail, food and drink. These issues, alongside high quality public realm, are to be supported as these are also required for a world-class environment, to attract students, academics, visitors and staff to enable the area to flourish.
- 7.3 There was also support for the inclusion of Salford city centre as part of the regional centre and core development area for residential and employment uses.

Locations and sites

- 7.4 Many of the respondents asked for clarity around sites and whether they were strategic or non-strategic. In relation to site allocations it was suggested that GMSF needs to contain a key diagram that identifies broad locations for housing and employment development, along with key strategic site allocations for the GM area.
- 7.5 Land allocations will be required to maintain a rolling five-year supply of deliverable housing land. Concern is raised about the timescales associated if the allocation of non-strategic sites is to be undertaken by local authorities in Local Plans. This will result in the GMSF being dependent on current sources of land (located in weaker market areas) for the first years of the plan period and will not meet current housing and employment needs. The land allocations identified in the GMSF need to identify infrastructure requirements for delivery of growth and co-ordinated infrastructure investment.
- 7.6 Related to sites within GM, for those who did not believe that GM will be able to meet the growth set out in the OAN, they asked that GM understand what provision can be provided close by and ideally within the same GM market area. They argued that in this instance the GM market area stretches beyond the political boundaries of GM.
- 7.7 Within GM there was a view from some respondents that the growth identified by the GMSF will not be met in the existing neighbourhoods and urban core. Suggestions for meeting this need in terms of location included:
- Focussing on the attractive neighbourhoods (often in suburban areas) of high demand that will retain and attract families in professional occupations; and
 - Urban extensions of varying scales that will be the most sustainable growth options.
- 7.8 Respondents argued that at present the GMSF lacks consideration given to demand and what people and businesses want to see. It also lacks consideration of providing the types of sites and property the industry wants to deliver and people want to work or live in.
- 7.9 In relation to delivery of the plan, there was feedback that planning regulations should be adjusted so that zoning is discouraged. The respondent argued that strict segregation of residential, industrial and commercial areas kills the natural growth of a community. By allowing uses such as small part-time businesses and workshops to spring up in housing areas, incentives will be available for people to use their leisure time for useful part-time work at home, all of which will add to the national stock and to the character of the community.
- 7.10 There is an urgent need to provide family-sized and aspirational housing to the suburban locations of the city region (e.g. Tameside, Oldham, Stockport, Bolton, and Bury). As a result, economically active residents are encouraged to move outside of the city region for family-

sized housing. New housing must be delivered in the specific areas in which need arises and in areas that can fulfil this need.

Brownfield and greenfield land

7.11 Respondents recognised that it was likely that not all development would be on brownfield land. The main issues in relation to land type concerned green belt and the value of greenfield land, which is discussed in the 'Green Belt' section below.

7.12 Not all respondents felt that the brownfield land would be sufficient for the level of development that GM is aiming for. They therefore argued that brownfield sites should be complemented with new settlements and sustainable urban extensions.

7.13 One respondent argued that GM has ample brownfield land and empty properties, and that these should be developed ahead of greenfield land or any release of green belt sites. They argue that GM should take a 'brownfield first' policy, and call for GMSF to set a target for the development of brownfield land. Incentives should be given to encourage the development of these sites.

7.14 It was recognised by respondents that much of the existing land supply is on brownfield sites. Some respondents argued that the analysis of the existing supply is insufficient and should be reviewed to understand what further capacity brownfield sites can have to support development.

7.15 Where brownfield sites are developed one respondent noted that sufficient greenspace also needs to be provided.

7.16 The development of brownfield sites was also linked to regeneration and development. Specifically, one respondent asked that the redevelopment of the land around Manchester Piccadilly, which is being developed as part of HS2, should be referenced alongside other large-scale developments in the same manner as Manchester Airport and Port Salford.

7.17 For those who advocated more greenfield development, some argued that greenfield sites may be more sustainable sites than brownfield ones.

Green Belt

7.18 The below comments are grouped in to three themes; Green Belt Assessment methodology support for a Green Belt Assessment and against development in the green belt.

Green Belt: Assessment Belt assessment methodology

7.19 Respondents provided various views on how the GM green belt should be assessed and provided views on what should be looked at if the green belt is reviewed.

7.20 In terms of the assessment and any review, the general consensus was that this should be done at a GM level as opposed to each local authority undertaking a review. It was also argued that the GMSF should set out a methodology for any future local green belt reviews.

7.21 One respondent suggested that the green belt should be assessed against the five purposes of the green belt set out in paragraph 80 of the NPPF and the sites identified should be further reviewed against paragraph 85 of the NPPF.

7.22 Respondents suggest that if the green belt is reviewed the scope and methodology should be consulted on with residents and the development industry.

7.23 A number of respondents noted that when the assessment takes place the value of the natural environment should be considered. If there is a release of green belt land there should be a consideration of what opportunities exist to define new areas of green belt to compensate for loss of land.

Support for Green Belt Review

7.24 Those who supported a green belt Green Belt assessment also supported an eventual review of the green belt boundary. They argued that review was necessary to ensure that GM meets its housing numbers.

7.25 It was felt by those who supported a change in the green belt that the assessment should be carried out on a GM basis as opposed to by individual Local Authorities.

7.26 In general, those who supported a review of the green belt felt that it was necessary as the green belt is very tightly drawn in GM and they therefore argued that it inhibits growth. They argue for GMSF to succeed there will need to be identification of safeguarded parcels of land within the green belt.

7.27 Those supporting a review of the green belt also argued that release should be for urban extensions, which would be the most practical solution to meet the identified OAN housing numbers for GM.

Against Green Belt Assessment

7.28 The respondents who objected to the assessment of the green belt did so in relation to environmental concerns, character of areas and use of land.

7.29 One respondent noted that the grades of agricultural land should be considered when assessing green belt.

7.30 It was argued that alternatives to green belt release should be considered, including increased density on sites and development of more flats.

7.31 One respondent argued that any review of green belt should be maintained for the next 20 to 30 years.

Design quality

7.32 Respondents commented on design in relation to three areas:

- Ensuring that design took into account environmental considerations and sustainability;
- Requesting clarification on design standards at a GM level and space standards. There were calls both for and against them; and
- The link between new design and the character of current towns and cities.

Regeneration

7.33 A number of respondents saw the GMSF as an opportunity to focus on regeneration. They also argued that the GMSF should ensure that it does not just focus on prosperous areas.

7.34 A key issue noted in relation to regeneration and the GMSF was that it does not focus enough on the relationship between transport infrastructure and development, regeneration, housing needs and location. Some respondents also noted that the GMSF should focus on place making and the relationship between jobs and homes.

Utilities

7.35 Specific feedback was received in relation to water provision and ensuring that GMSF takes account of the impact of growth options set out on water supply. There were also a number of comments that GMSF should also consider issues concerning waste provision and drainage.

Critical infrastructure

7.36 Issues concerning water supply and management were raised in terms of critical infrastructure. Respondents asked that GMSF considers the impact of large scale development on infrastructure and the overall impact on the environment.

Development viability

7.37 Responses in relation to development viability focussed around ensuring appropriate levels of viability assessment. Specifically there was a call to fully analyse the 'Call for Sites' process, which took place at the same time as the consultation.

7.38 Respondents also asked that the following issues were considered when looking at the viability of potential sites: utility infrastructure; schools capacity; ground conditions / potential contamination; ownership; and mining activity.

Historic environment

7.39 The historic environment was raised by a number of respondents in relation to the character of a place.

7.40 Respondents who addressed the historic environment asked that the GMSF consider the historic environment when setting out development management policies. They also asked for clarity about how such policies would relate to local planning development policies.

Sustainable development

7.41 Respondents in relation to sustainable development requested that the GMSF recognises both environmental and cultural factors more fully.

7.42 In general, those who raised comments concerning sustainable development felt that the GMSF vision was too focussed on economic factors and did not take into account wider factors. Other respondents felt that the scope was correct in terms of the Vision.

City Centre/Regional Centre

7.43 Several respondents stressed the importance of the city centre / regional centre. There should be more reference to the city centre as a key driver of regional economy and the protection and significant enhancement of the economic role of the city centre should be a fundamental policy within the GMSF. There is also recognition and support of the wider

regional centre as a key geographical area central to the success of GM as a whole and complementary to the city centre as the central core. However, there was some caution voiced with a 'regional centre'-based economic plan as it should be recognised explicitly that this will increase the need to travel by reducing employment opportunities elsewhere. This will likely drain resources from the rest of GM and the North West as a whole.

7.44 In terms of hierarchy, there was support of the intention to maintain the existing hierarchy of a single city centre, complemented by eight main town centres.

Town Centres

7.45 Several respondents point out the importance of town centres and town centre growth. There was general support for the town centre first approach. Town centres should be allowed to agglomerate and grow and there should be more reference to town centres as key drivers of their local economies.

7.46 The section on town centres should be expanded to include reference to culture and cultural assets. Venues such as theatres and cinemas play an important role in promoting the night-time economy and supporting diverse and vibrant town centres. Additionally they state that the performing arts is only acknowledged under tourism, and whilst this is important, they consider the role of cultural assets, events and opportunities in attracting and retaining residents and a skilled workforce should also be highlighted and supported in the framework.

7.47 There should be a stronger emphasis on the agglomeration benefits of residential and office space development in town centres, specifically supporting growth and preventing leakage to the regional centre. In addition, the GMSF should consider whether industrial / warehousing land in town centres should be developed for housing, thus reducing the amount of HGV traffic. Similarly, it was argued that peripheral retail areas in town centre should be developed for housing and that this will increase the likelihood of the remaining town centre retail succeeding.

7.48 The issues of retail, leisure and town centres should be addressed in further detail; there should be up to date evidence on the retail hierarchy below the eight main town centres. The GMSF should also; acknowledge of the recommendations of the GM Town Centres Project (2013,) and there should be up-to-date evidence of the potential for new town centre designations (e.g. Salford Quays and Media City).

Northern Powerhouse

7.49 There is general support for the Northern Powerhouse concept in itself and for a powerful Northern Powerhouse economy. There was some reservation that cities within the Northern Powerhouse could suffer from a loss of identity, but it was fully recognised that GM is extremely well positioned at the heart of the powerhouse to take advantage of the potential rapid growth and inward investment that is likely to take place over the coming years. Levels of growth associated with this are, if properly planned for, achievable and clearly available.

7.50 It is argued that Option 1 is in direct contravention with the Northern Powerhouse aspirations, and that it would effectively constrain economic growth. A number of respondents felt that the messages behind the concept of the Northern Powerhouse are clearly in line with Option 3. Dismissing Option 3 raises questions about GM's commitment to playing a leading role in the Northern Powerhouse.

7.51 If the Northern Powerhouse ambitions of the area are to be satisfied and enable the retention of skilled labour, new housing must be provided. It is estimated that the failure to build enough new homes means an estimated £4.6bn less GVA growth and £1.7bn less spending on retail and leisure in GM every year.

7.52 There are a number of specific spatial issues regarding the economy put forward:

- It was stated that a wider connection could be made to the broader scientific corridor across the north of Cheshire, which includes important institutions such as Jodrell Bank.
- In terms of larger key sites there was support for the continued promotion of Salford Quays and Media City as a core hub of development opportunity across sectors.
- In addition to office and industrial uses, further detail could be included on wider relevant land uses such as retail and leisure. There was specific support of the recognised role of Trafford Park and other key employment locations and the Trafford Centre as a key retail and leisure destination.
- It was put forward that the Trafford Centre Rectangle / Trafford City should be designated as a Strategic Mixed-Use Growth Location, reflecting the status given to it within the Adopted Trafford Core Strategy (Policy SL4).
- There is support for the proposal for comprehensive redevelopment of the area identified in the draft HS2 Manchester Piccadilly SRF, and some respondents argued that the vision of the GMSF should be similarly positive and directly reflect the ambition of the Manchester Piccadilly SRF. Additionally, specific mention of the wider Piccadilly area should be made in section 3.
- The socio-economic benefits of the proposed Carrington Strategic Site development include developing an economy that is strong and sustainable with a wider range of employment opportunities to meet the needs of GM. This was also highlighted in the comments.

7.53 Urban extensions were generally put forward as being preferred over new settlements. Sites in sustainable locations, which are considered the most deliverable, should be released to ensure delivery within the Plan period.

7.54 It was advocated that the GMSF should contain a key diagram that identifies broad locations for housing and employment development, along with key strategic site allocations for the GM area that make the best use of existing and new infrastructure and deliver regeneration and growth.

8. Transport

8.1 This section gives details of all the comments related to transport. This includes transport issues such as commuting and public transport, as well as individual transport modes such as Manchester Airport and Manchester Ship Canal as well as comments related to HS2.

Key Messages

- There should be a stronger linkage with the Transport Strategy 2040;
- Transport should have its own theme alongside economy, place and people;
- The Strategic Objectives should make reference to the Metrolink and proposed expansion;
- There needs to be a background document on transport ;
- There should be more emphasis on reducing the need to travel and modal shift;
- GMSF needs strengthening in the area of sustainable transport;
- Opportunities should be capitalised on (e.g. Manchester Airport, Port Salford and HS2/3);
- There needs to be reflection on the scale of congestion and, the issues it causes and the measures and investment required to resolve them;
- GM should make a commitment within the GMSF to avoiding building- in car dependency in new developments;
- Recognise the role that aviation plays in creating carbon and other harmful emissions; and
- Identify a clear delivery strategy for the Manchester Ship Canal.

General

- 8.2 There are various comments as to the document not making enough reference to the relationship between transport infrastructure and development, regeneration, housing needs, housing location, viability and place-making.
- 8.3 Transport currently falls under the economy theme within the Options papers. However, given its importance to the delivery of the Plan it should form its own theme alongside economy, place and people.

It was highlighted that there is currently no reference to the Metrolink or the proposed expansion of the network in the strategic objectives.

- 8.4 It was felt that the constraints that have been identified fall significantly short of the factors that will influence development and need to be taken into account. Likewise the opportunities component is not addressed clearly in the document. In relation to travel and transport it is an important factor as both a constraint and a key issue for economic growth. This needs to be approached from multiple perspectives and a simple statement that all development must be accessible by public transport is overly simplistic.
- 8.5 Accessibility mapping is entirely dependent on the methods used and the use of GM Accessibility Layer needs to be carefully considered. The accessibility mapping should be accompanied by other assessments, such as routing and travel times, proximity to shops, services and centres of employment, and should not be taken on their own.
- 8.6 In general terms the GMSF should seek to set policy on those issues that are best planned on a larger scale, such as strategic transport planning.
- 8.7 Transport is referred to as fundamental to the achievement of the GMSF. It is therefore important to ensure within the Spatial Framework that the infrastructure requirements to achieve the full growth aspirations are actually deliverable. In some circumstances that may be well beyond what an individual authority can actually consider in isolation. When it comes to transport provision therefore, this should be considered fully within the GMSF and its associated documents and not left to be dealt with later in individual Local Plans. The balance would be wrong if it wasn't dealt with in that manner.
- 8.8 There should be a moratorium on airport expansion, new road building and car parking provision in city centres. Similarly, broader strategic matters such as national and regional transport routes will be crucial to GM's future growth and development and should be recognised. The GMSF should be closely linked to sub-regional transportation improvements in line with the Northern Powerhouse initiative and the Highways England Road Investment Strategy in order to address regional transportation issues.
- 8.9 It is argued that the Consultation Document itself makes little reference to connectivity and contains no proposals or strategy for how this will be achieved. For the ambition to mean anything it must be accompanied by a proposed strategy for achieving better connections between the various communities of GM.
- 8.10 There was also concern expressed that there is not a sufficiently strong linkage with the Transport Strategy 2040. An integrated approach in which the transport and spatial strategies are developed fully together is encouraged. At this stage in its preparation the TfGM

Transport Strategy 2040: Our Vision strategy does not provide a sufficiently robust transport evidence base upon which to determine strategic land allocations.

- 8.11 A number of representations state that the GMSF should note that spatial planning should be directed towards reducing the need to travel, not encouraging more of it. It is considered that there should be a statement recognising that soft measures / smart choices can have a positive cumulative effect. Finding additional sites for development and the analysis of locations also appears to be devoid of consideration of either the intention to reduce the need to travel or the intention to secure modal shift.
- 8.12 There is general support in the principle that residents should be able to make use of sustainable means of transport in order to reduce reliance on the use of the private car. The ability to achieve this can be enhanced by the development of significant mixed-use sites, which can bring a number of complimentary uses together in order to maximise the sustainability of new developments.
- 8.13 The conflict is noted on numerous occasions of the ambition to double passenger numbers at Manchester Airport, support major improvements in road links and to facilitate major improvements in motorway capacity, all being incompatible with climate change obligations. It is put forward that instead there should be a greater focus on modal shift for freight and commuters and on reducing the need to travel by careful siting of new developments and by investing in high-speed broadband and video conferencing facilities. To reduce the need to travel, transport planning must aim to create mixed-use developments (e.g. shopping with housing and small business premises etc.) Additionally, all new houses should be built to improved standards for accessibility.
- 8.14 The background document makes clear reference to lorries and freight movement by road rather than alternative sources such as rail and water being the main contributor to poor air quality. More information is needed in the GMSF in regards to the importance and maintenance of existing rail heads where freight is moved, and the potential for new sites to increase movement to more sustainable options to reduce impact on air quality. GM is a net importer of minerals with significant amounts of its requirements met from outside its boundaries. As such pushing for growth is likely to increase this demand and the number of vehicle movements in to the area. Therefore this is a real issue that is likely to have a continued impact on air quality for many years and is a recognised concern of those areas from which the mineral is sourced.
- 8.15 There was support expressed for the objective of improved transport connections in Para. 3.15. Better and more integrated transport infrastructure will also be likely to benefit residents in High Peak in being able to access a wide range of job opportunities in GM. Transport links used by commuters in outlying towns are often shared by freight and other business-related journeys. Congestion and delays on these routes, including the A6 and A57, can therefore be particularly harmful to the economy. It will be essential for the GMSF and parallel strategies to adopt a joint approach to identifying and delivering the necessary measures to tackle the issue. One example of this is *'The A6 Corridor Study'*, commissioned by Stockport MBC and supported by High Peak Borough Council, Derbyshire County Council, Cheshire East Council and TfGM. However, more co-ordination is required in terms of infrastructure delivery. Further feedback on transport infrastructure matters was submitted by the Councils to the recent consultation on the Transport Strategy for GM and this should be referred to within the GMSF.
- 8.16 The ability to keep traffic moving on roads and to provide other infrastructure needs never keeps up with the problems created when new housing or other building developments take

place. Even a very small number of additional houses in a particular area can create challenges on the roads by their marginally increased use. However by creating an entirely new settlement, this enables these issues to be resolved at source i.e. in the design of the new settlements and its links with other areas.

Commuting

8.17 Close proximity of workplaces to homes and services cuts down commuter movements and saves time and energy. The GMSF doesn't recognise the potential for mixed-use development to assist in delivering spatial objectives, reduce carbon emission and congestion

8.18 There is no real attempt to recalculate what it means to have over 12% of employed people in the North West now working from home for all or part of the week – a trend that is steeply rising. It is illogical to plan for more commuting movements using out of date formulae to calculate the amount of employment land that will be required. Linked to this, CPRE recommend that homes should be designed with offices or live / work space to create more self-sufficient communities.

8.19 There is an increased demand for travel in to Manchester that is not currently met by the road or rail network, compounding the ability of people to access the regional centre. Good transport links are critical to attract commuters to and from Manchester. Attention should be given to improving transport congestion and the ease of connectivity so as to enable economic growth. There is insufficient transport infrastructure and high levels of congestion in central Manchester, Manchester's inner suburbs, Stockport, Trafford and Salford and they are the main constraints to growth aspirations after land availability. The GMSF needs to reflect the scale of this challenge, the issues, measures and investment required to resolve the issue.

8.20 It is argued that ONS data shows an outflow of young economically active families and an increase of in-commuting in to the city. Households are leaving the city for locations that meet housing needs. To stop this cycle additional land for attractive family housing needs to be released. Those living with parents who are unable to move out due to affordability lead to more commuting as households move out to find more affordable homes.

Modes

8.21 It is argued that GMSF should support everything possible to achieve a modal shift away from vehicular transport and implement improvements to public transport. Achieving a modal shift from the private car to sustainable transport to achieve economic growth is widely supported and policies should restrict private car use. The GMSF should ensure that the location and density of development should maximise the potential for this to be achieved.

8.22 Development should take place in locations with existing infrastructure (such as between Woodford Aerodrome and Poynton Relief Road), not in peripheral areas only accessible by car. The location and density of development should maximise walking, cycling and public transport usage opportunities. They should also reduce dependency on the car and the need to travel. Additional sites that are required to accommodate large numbers of new housing should be focussed around public transport modes.

8.23 Generally comments refer to a requirement for high density and high quality development served by sustainable transport. For this to be achieved the same connectivity as London, urban areas must be developed at a higher density to make public transport connections

viable. Sites in the city and town centres should be maximised due to their accessible nature but it is acknowledged that they are under the greatest pressure for land resources. The significant investment in public transport that is set out will be required (if development outside of these locations is considered appropriate) in order to minimise further increase congestion and air pollution.

8.24 It is highlighted that the emphasis on improving health and healthy lifestyles in the Strategic Approach and Objectives is good, but the document should make a stronger commitment to ensure that the planning and design of new housing avoids building in a future of car dependency. This will benefit residents and the wider population in terms of reducing pollution and congestion.

8.25 The Strategic Approach and Objectives provide mixed messages. The emphasis on maximising non-car modes is welcomed, but is inconsistent with supporting major road and rail improvements. GM can and should be at the European and global forefront of radically changing the transport model (which is currently focussed on personal car transport and large scale motor infrastructure projects).

8.26 Furthermore, major new roads or trans-Pennine tunnels should not be prioritised; high quality public transport and cycle facilities should be instead. Infrastructure should be planned to cope with the greater use of electronic cars. New roads (if needed) should have segregated cycle routes. High priority should be given to segregated footpaths and cycle ways and resourced as infrastructure projects in their own right. Cycling has the potential to become a highly sustainable mass transit mode with health, air quality and reducing congestion benefits. Serious infrastructure investment is required for this to occur. New developments should provide cycle parking and secure cycle storage.

8.27 The framework should also show the full potential of the waterways to help deliver the emerging vision. They play a key role in the development of sustainable, resilient and smart developments. They provide the opportunity for improved connectivity and to increase the use of sustainable transport.

8.28 Those who commute from outside in to GM for work should be able to do so by non-car modes, particularly by train and bus. There should be new public footpaths in rural areas.

8.29 Section 2 should emphasise more clearly that new development must be accessible by sustainable forms of transport and embedded within them.

8.30 Overall it is welcomed that the need for major improvements in walking, cycling and public transport links is recognised; Statements in para 3.22 regarding the location and density of development encouraging sustainable modes of transport, reducing car dependency and supporting public transport investment is particularly welcomed.

Airport

8.31 The GMSF should identify nationally and regionally important infrastructure investment, including Manchester Airport. Manchester Airport is acknowledged as a key asset for the country and there is significant importance in attracting a range of global businesses to develop around the airport. Manchester Airport offers the city region huge potential to stimulate growth and deliver new jobs.

8.32 Reference for the need for any investment to be done in an environmentally sustainable manner is welcomed and it is proposed that any growth be achieved in line with the international agreement to limit global temperatures. There is the need for greater recognition within GMSF of the role that aviation plays in generating carbon and other harmful emissions. It is argued that whilst pursuing sustainable economic development we must not adopt plans that will contribute to air travel and airport capacity. Transport systems that are carbon neutral should be encouraged, while development that increases emissions should not be.

8.33 There is real conflict between supporting airport expansion and policies that tackle pollution. There are incompatibilities between the air quality objectives and greenhouse emissions policies and the desire to increase passenger numbers.

Manchester Ship Canal

8.34 The objective to make better use of the Manchester Ship Canal is supported and welcomed. Almost a quarter (22%) of all GM households are within 1km of the waterway, and the availability of high quality waterway infrastructure will encourage people to use it for commuting and recreational purposes.

8.35 The development of nationally significant logistics facilities by means of a link with the Port of Liverpool and Port Salford can put GM at the forefront of sustainable freight movement. Further opportunities to expand this link and logistics should be encouraged. The GMSF must identify a clear delivery strategy that sets out how and when those objectives will be delivered.

8.36 Port Salford should be expanded and the opportunity to create a national logistics hub of approximately 500,000m² delivering 10,000 jobs should be recognised in the GMSF. Green belt land release is needed to realise the potential of this national project.

HS2

8.37 If GM, as its vision advocated, is to become one of the world's leading regions, reference should be made to the implementation of nationally significant infrastructure, such as HS2 and the associated economic and regeneration opportunities. HS2 will: Respondents argued that

- Deliver fast, frequent and reliable services;
- Create opportunities for GM's businesses;
- Be worth hundreds of millions of pounds to the regional economy;
- Regenerate the area around the stations and create development opportunities;
- Support 30,000-43,000 jobs; and
- Deliver 3,100 new homes to GM.

8.38 The Strategic Regeneration Framework is an appropriately ambitious and positive framework for the Piccadilly area. It responds to the opportunities that HS2 will bring and seeks to ensure that its delivery has maximum positive spin-off benefits for the city centre and its fringes. Comprehensive redevelopment of the area will allow for the integration of this area with the wider central area. This can considerably enhance the residential offer of the area, creating jobs and services and providing a landmark approach to Manchester.

8.39 The redevelopment of the Piccadilly area would be on previously developed land in a sustainable location, which will have a positive impact on many potential constraints including ecology, air quality and health. It will act as an important component of meeting identified

residential and commercial need in GM.GMSF should therefore refer to HS2 and the regeneration of Piccadilly in the same manner that Manchester International Airport and Port Salford are referred to in the document.

8.40 The Vision of the GMSF should be similarly positive and directly reflect the ambition of the Manchester Piccadilly SRF. The Vision should be more ambitious and amended to include specific reference to the role of HS2 and the regeneration of the wider Piccadilly area, which should be identified in subsequent versions of the GMSF as a strategic site. It is of such fundamental importance to the city centre and the economic prosperity of GM that its subsequent inclusion as a strategic site in the GMSF Vision is justified. There is, however, opposition to the proposed HS2 station in the countryside and the idea that this would result in additional car trips to access the station. There is some concern about the threat the proposed HS2 route poses to areas of ancient woodland, particularly at Coroners Wood and Sunbank Wood. The land owner of Davenport Green, where the proposed HS2 Manchester Airport Station will be located, strongly supports the GMSF intent to improve transport links to London through initiatives like high speed rail. Links to other northern cities through initiatives like HS3 are also supported.

8.41 It is argued that the GMSF only provides cursory consideration of the economic impacts of significant infrastructure projects such as HS2. Projections are felt to have been diluted by the recent economic recession. The proposed scale of infrastructure investment including HS2 has not been seen in the north for many decades and could not be implicit within any projection based solely upon past results.

8.42 Generally it is seen that the redevelopment of Piccadilly is key to enhancing the quality of place in central Manchester, it is fundamental to achieving the main aim of the Vision of the GMSF for GM to become one of the world's leading regions by 2035. By 2033 Piccadilly needs to have provided Grade A office space and residential units necessary to fully deliver and maximise the ambition for the area. Reference should be made to the delivery of HS2 and the associated regeneration necessary for the project to be a success.

9. People

9.1 The theme on people relates to comments about the statistics used to assess the population, including migration and household growth, and also issues such as health, crime and social care that affect the population's welfare and wellbeing.

Key Messages

- Add an ambition and vision to “improve the health and well-being of Greater Manchester”;
- Include indicators to show increases in health, well-being and quality of life;
- Include reference to mental health as a key goal of the strategy;
- Increase focus on social objectives and how they integrate with growth priorities;
- Understanding the growth in certain groups and cohorts (e.g. older people);
- Seek to explore the reasons for past household formation rates and why the 2012-based projections forecast less population growth relative to previous household projections;
- Evidence should assume higher levels of international migration coming into GM;
- Seek to reverse migration out of GM, particularly younger, economically active families;
- Need to consider longer trends in migration in order to address artificial impacts of the recession;
- More work required in relation to headship rates and the impacts of the recession;
- GMSF should not be based on negative past trends in terms of household formation; and
- The Ambition lacks any counter-balancing statements, e.g. – for example, ensuring that no drive for growth will have deleterious impacts on health.

General

- 9.2 An overarching view appears to be that the GMSF does not fully recognise some of the issues relating to people and overall quality of life and that these should be given a higher profile. Some comments consider that the people section is more limited in its scope and impact than either the place or economy sections, and there is a view that economic growth and ambition should not be at the expense of the community and environment. Interconnectivity between the economy, place and people elements will be key, and it is important that the GMSF recognises the importance of the built and natural environment in delivering economic, social and environmental objectives.
- 9.3 The role that a good quality housing offer, that meets the needs of all groups, can play in improving overall quality of life for GM residents was emphasised by respondents. This relates to both new housing and the regeneration of older housing areas.
- 9.4 There was argued to be a need to acknowledge the pressure that additional houses and residents will have on open space and leisure facilities. Making GM a good place to live must include ensuring that everyone has good quality green spaces near to their homes. Reference is also made to increased tree planting and access to woodland (e.g. City of Trees project).
- 9.5 Comments were received that the GMSF needs to recognise the cultural and social diversity of the sub-region. Failure to address social and economic inequalities may stifle growth. In addition, the value of older people living in and visiting the city centre was noted. This requires an age friendly approach that plans for appropriate housing, neighbourhood services, sufficient transport services and sufficient infrastructure.
- 9.6 GMCA needs to demonstrate its health credentials by interweaving health throughout the plan, notably in relation to air quality, road safety, active travel and the condition of the public realm. This should not be left to the final stages. Whilst the GMSF acknowledges poor health and health inequalities it is considered that the promise to tackle it is less than credible given statements elsewhere relating to increased air travel and roadbuilding, and their associated emissions.
- 9.7 There is a lack of conformity to NPPF since there is an imbalance between economic, social and environmental gains with no ambition put forward for social or environmental assets. An example was provided at paragraph 1.8 that in relation to health matters only negative impacts of a poor environment are considered when instead it should recognise the benefits of a good environment. This is supported by general health and wellbeing advantages from the natural environment and the role of voluntary work in terms of training and social gains.
- 9.8 The plan should recognise that the benefits of sport to the economy are even wider than identified. These include, but are not limited to increased happiness and wellbeing; improved health and thereby reduced costs to the health service; improved educational attainment; lower crime; and increased walking and cycling leading to a reduction in, emissions and congestion.
- 9.9 In essence, it is considered that whilst the plan is rightly focused on key economic, innovation and employment ambitions the plan lacks key social ambitions. GMSF should adopt an approach to development and regeneration that places planning for people at the centre of the spatial framework and it is suggested that the TCPA Planning for People manifesto should be referred to.

Population Change

9.10 Understandably there is significant cross-referencing in relation to population change, population projections, migration and household growth. Many of the points made here will also have been made in relation to Background Paper 3.

9.11 Most of the comments in relation to population change repeat the points set out below:

- Population change has been underestimated because the assumptions made in relation to migration are flawed. This is particularly the case in relation to the impacts of international migration on population change;
- The GMSF must seek to understand the implications of projecting forwards on the basis of reduced international immigration in terms of the working age population and sustainable economic growth and communities. This is important as the GMSF also appears to be based upon the increased outflow of the most economically active residents away from GM
- The GMSF should urgently seek to reverse the trend of the outward flow of the most economically active away from GM; and
- Unattributable Population Change (UPC) has not been properly taken account of in the evidence underpinning the GMSF.

9.12 Some of the comments also reflect the characteristics of population change. Understanding the changes in the spatial distribution of different ethnic groups is essential for planning appropriate services at a neighbourhood level, and the GMSF should take account of this. There will be more elderly people in Greater Manchester in the future. The GMSF should consider their needs and wants - for example, housing for elderly people and associated transport needs. This might involve drawing on the opportunities presented by the growth in the population aged 50 and over, notably with policies such as extending working life (EWL), increasing participation in volunteering, and an expansion in the consumer market geared towards older people. Reference is also made to the opportunity for the Framework to link strategically into parallel initiatives currently being developed by GM, for example the development of the vision, priorities and year 1 action plan for the GM Ageing Hub.

Population Projection

9.13 Most of the comments in relation to population (and household) projections repeat the points set out below:

- The 2012 Sub National Household Projections (SNHP) are used to define the housing OAN. This should also be the starting point with consideration given to other factors;
- The 2012 SNHP will have been heavily influenced by the preceding five recessionary years. Plans should not be made on the basis of perpetuating recent negative past trends forward. Such an approach has been rejected by Local Plan Inspectors (e.g. Derbyshire Dales EiP);
- GMSF states that GM is losing around 5,000 working age people a year to other areas and the GMSF appears to justify the continuation of this trend;
- Migration assumptions that have underpinned the projections have been shown to be flawed as they reflect a period of suppressed household formation and internal migration rates. The assumptions also seriously under-estimate levels of net international migration;
- The 2012-based projections do not take any account of the substantial shortfall in housing delivery across GM;
- There is no justification for not seeking to return growth to the 2008-based household formation rates, which was a more 'normal' period of growth;

- The 2014-based national population projections show much higher levels of international migration than the 2012-based projections. Therefore the plan should proceed with a higher international migration assumption in line with that now adopted in the 2014-based projections;
- The issue of Unattributable Population Change (UPC) and its treatment in demographic projections is one that GM authorities still need to consider. While the ONS decided at a national level to exclude UPC from the population projections, this does not automatically mean it is the correct decision at the local level;
- There is market signal evidence suggesting that some of the districts underprovided new homes in the past. Therefore at least some market signal adjustment is warranted and this needs to reflect those parts of Greater Manchester where there is the strongest evidence that need has been suppressed;
- There is a need to consider the population implications of an ambition that seeks to attract and retain residents; and
- The population growth rate of Option 2 is 0.5% pa over the period 2014 to 2035. This is well below the growth rate for England as a whole and all the high-performing regions in the UK. The AGS-High scenario growth rate matches London, which would significantly contribute to rebalancing the economy

Migration

9.14 Most of the comments in relation to migration repeat the points set out below:

- Past underperformance in relation to housing delivery and the recession will have artificially inhibited and suppressed inward migration into Greater Manchester;
- National assumptions within the 2012 projections regarding immigration into the UK are lower than actual trends and therefore the figure for GM is likely to be an underestimate. Net international migration in the period 2012-2015 has been very high. This needs to be addressed in respect of the GMSF evidence base;
- There is the view that the GMSF approach of projecting forward average flows taken over the ten-year period 2002-2012 for the years 2014-19 only with a full return to 2012-based projections (i.e. 150,000 per annum) by 2023 is fundamentally flawed. The two main flaws being that firstly the ten-year average flows should be taken from the most recent database available rather than the period up to 2012, thereby reflecting recent peaks. Secondly, there is no evidential basis for anticipating that levels of net immigration will fall to 150,000 per annum. A five-year growth followed by a long term decline appears arbitrary;
- GMSF (para 3.39) must provide the flexibility for the region to respond to levels of migration that reflect long-term trends. Greater Manchester, at the heart of the Northern Powerhouse and the second city region in the UK to London, is likely to continue to be seen as a principal destination for international migrants settling in the UK;
- The GMSF must seek to understand the implications of projecting forwards on the basis of reduced international immigration in terms of the working age population and sustainable economic growth and communities;
- The GMSF should urgently seek to reverse the trend of outward flow of the most economically active residents away from GM. It is not appropriate to have an approach that assumes that the most economically active would continue to move away in greater numbers;
- To reverse the outward migration the GMSF must provide the right housing in the right locations, particularly attractive family housing. This will inevitably require the release of green belt land;

- Respondents noted that AGMA has accepted that demographic baseline needs to be adjusted to take account of the flaws on the ONS projections relating to net-international migration;
- Taking a longer ten year migration trend can help to iron out any fluctuations that occur. Many local authorities therefore compare the impact of using both five-year and ten-year migration trends;
- It is considered that a ten-year migration trend applied to the entire plan period, as per Option 3, represents the most robust assumption to adopt in order to fulfil OAN for Greater Manchester; and
- A specific point made in relation to migration notes the role the Universities play in the growth of the economy both locally and strategically. Through growing trends and migration patterns, student numbers will be seen to increase steadily in terms of growth forecasts and will ensure that GM universities can continue to compete successfully with the best across the world.

Household Growth

9.15 Most of the comments in relation to household growth repeat the points set out below:

- The GMSF should seek to explore the reasons for past household formation rates and why the 2012-based projections forecast less population growth relative to previous household projections;
- have particular regard to younger age cohorts as these are likely to have been most affected by the under-supply of housing and the consequences of economic recession. In particular 25 - 34 year olds should be considered further as they have the highest propensity to form households;
- GMSF should have particular regard to younger age cohorts as these are likely to have been most affected by the under-supply of housing and the consequences of economic recession. In particular 25 - 34 year olds should be considered further as they have the highest propensity to form households;
- It is reasonable to assume that as the economy recovers and housing delivery increases, it is likely that there will be at least some return towards previous trends in household formation rates. In this context the 2012 rates would be too low and a return to the 2008 rates in the longer term, as assumed by Option 3, is to be preferred;
- The GMSF consultation document favours household growth that will entrench and perpetuate past economic failings and the present housing market crisis. Negative past trends do not provide a sound basis for projecting the GMSF forwards, and it falls well short of the GM Vision;
- Household formation rates over the last decade have undoubtedly been affected by 2008 recession;
- There was support for the use of the DCLG 2012 household projections ahead of the GMFM. This aligns to PPG and avoids the use of demographic projections that are clearly constrained; and
- Respondents did not believe that the adjustments applied to demographic projections go far enough. The assessment was not felt to applying an adjustment to headship rates despite evidence that household formation rates for 25-29 and 30-34 age groups in particular are constrained.

Health

9.16 Improved health and social care provision and ensuring access to employment and good quality homes and neighbourhoods across all parts of GM will be vital in delivering these

ambitions. The general health and wellbeing of the population is seen as important in order to share the benefits of economic growth.

- 9.17 The report should consider the benefits of a more integrated approach. For example, para 1.8 considers health matters without considering the relationship with environmental factors. The natural health services provided by our green and blue infrastructure play a significant role in sustaining people's physical and mental health and wellbeing, in addition to helping people on the road to recovery after illness.
- 9.18 The promotion of healthier transport modes (walking and cycling) is supported as a way of improving health whilst reducing congestion and air pollution. However, it is considered that there is a need for significant infrastructure improvements to encourage walking and cycling, including the safety of new and existing routes. Linked to this is the need to avoid patterns of development that are car dependent.
- 9.19 Access to sport, leisure and recreation, including in rural areas, is also important. Comments support the commitment to improving the quality of GI and emphasise the importance of incorporating new GI in development in order for it to be sustainable.
- 9.20 Improving mental health will be a key input for the achievement of the goals listed and it will be more likely to be achieved if it is specifically included.
- 9.21 There is a general view that there is an over emphasis on economic indicators in terms of measuring progress. The Greater Manchester *Vision* should instead have as its core ambition the achievement of measurable improvements for residents, including health, wellbeing and quality of life. A thriving conurbation cannot grow on an unhealthy population. The health of the environment is critical to a healthy place and population
- 9.22 Sustainable development, linked to improvements in public transport (e.g. HS2) of this nature will have a positive impact on many of the potential constraints identified within the consultation document, including ecology, air quality and health. The importance of air quality is raised as a key issue. It is considered that plans to increase road and air travel capacity are fundamentally at odds with the aims of the Climate Change Strategy and the health of residents in terms of increased global warming emissions.
- 9.23 By 2035 the GM population should be healthier across the range of health indicators. The GMSF and overall ambition for Greater Manchester provides an opportunity to close the health inequalities gap not just via health and social care but through ensuring access to employment and good quality homes.
- 9.24 The stated intention to improve health and longevity is welcomed. There is a mismatch within the framework between the aspiration and the reality of what it will achieve. Joined up thinking between the Climate Change and Transport Strategy is admirable and essential, however increasing road and air travel capacity is fundamentally at odds with the Climate Change Strategy - they will increase air pollution with adverse health consequences for residents.

10. Social Infrastructure

10.1 Social Infrastructure is a subset of the infrastructure sector and typically includes assets that accommodate social services. As such this section looks at comments received that relate to such services as schools, universities, health, emergency services and prisons.

Key Messages

- There is a need for a GM wide health strategy with the coordination of JSNAs through a GM wide assessment;.
- There needs to be a specific reference to meeting an increasing older population who would not be in employment;.
- Increase focus is recommended on social objectives and how they integrate with economic priorities;.
- Greater focus is required on the role that the historic and environmental assets play on social roles;.
- The GMSF should show how the provision of community infrastructure such as sports facilities across GM will be influenced; and
- Include reference to the quality and quantity of education provision across GM.

General

10.2 It is accepted that the scope of the GMSF is limited in setting out the role of social infrastructure. The framework should highlight the role cultural assets, events play in retaining residents and a skilled workforce. The GMSF should be clearer on how it will influence the provision of community infrastructure across GM, in particular the direct influence that the location of services has on social inclusion, health, wellbeing and access to education and skills.

10.3 There is inadequate focus on social objectives and the roles they play in GM; it should be shown that they fully integrate with economic priorities. Social goals and dependencies are not clearly set out or shown as being part of an integrated approach to sustainable development. The emphasis of the plan is economic with social issues dealt with in a peremptory manner. it was felt that a thriving conurbation cannot grow on an unhealthy population.

10.4 New housing growth must be supported by close links to health and social care to lead to enhanced wellbeing. It is important to ensure infrastructure is in place before development occurs to ensure social infrastructure is available before housing and employment uses are developed. New sports facilities should be considered when allocating strategic sites for housing.

10.5 There is a failure to appreciate the health, educational and economic roles that the historic and natural environment assets of GM play. GM's distinctive character needs protecting and enhancing as it plays a range of social roles, not just environmental ones. The Vision needs to set out future aspirations for the 'distinctive character' of the area. A one-dimensional

approach has been taken in identifying economic topics in isolation from the services required to support them. Social opportunities, goals and dependencies are not set out as part of an integrated approach to sustainable development.

- 10.6 The two-tiered approach of the GMSF has the potential to plan at city region and local level. However, this will only deal with strategic land and there is insufficient consideration to the likely infrastructure requirements needed to deliver growth.

Schools

- 10.7 The delivery of schools will need to form part of an assessment of viability and deliverability. School capacities are an important constraint / opportunity when identifying and assessing new sites for housing and employment.

- 10.8 The GMSF should be clear on how it will influence the provision of community infrastructure across GM. There is currently limited reference to the quantity and quality of education provision, which has a strong influence on economic growth and the demand for housing

Health

- 10.9 There is adequate reference to the need for the co-ordination of health and social care function throughout the document, but it is not central within the document's scope. These should be major considerations within the scope of a spatial framework.
- 10.10 Addressing health inequalities both within GM and in comparison with other cities and national data is an important component of the plan. It is not a significant constraint to development but instead an underlying issue that needs to be addressed irrespective of the location of development.
- 10.11 Joint Health and Wellbeing Strategies (JHWS) and Joint Strategic Needs Assessments (JSNA) should be taken in to account as part of plan-making evidence. There is the perfect opportunity to set out strategic public health and healthcare priorities and needs within the GMSF. This can be achieved by considering the benefits of developing a GM health strategy and if appropriate coordinating the development of JSNA's through a GM-wide health assessment.
- 10.12 The framework would benefit from clarity on how it will influence the provision of community infrastructure across GM - in particular, the capacity to care for all ages of current and future populations. The framework overlooks health problems associated with a lack of appropriate housing provision.
- 10.13 Climate resilience can support health and wellbeing goals and this should be highlighted within the framework. The multifunctional nature of waterways and the contribution they make to social objectives such as public health needs to be recognised within planning policy. The 'blue lungs' they create have physical and mental health benefits.
- 10.14 *"The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local Planning Authorities should take a proactive, positive and collaborative approach to meeting this requirement and to development that will widen choice in education"* (NPPF, para 72)

11. Options

11.1 This section looks in more details at the specific comments received about the growth options put forward as a basis for the GMSF. These growth scenarios argue and put forward three future scenarios for GM in terms of future growth. The comments received looked at each option as well as suggesting further possible options.

Key Messages

- The vast majority of representations are against Option 1;
- As with Option 1, Option 2 has been discounted by a number of responders as not aligning growth with the vision of the GMSF to compete successfully on a global scale and constrains aspirations of the Northern Powerhouse, devolution agreement and the GM Growth Deal;
- Options 2 and 3 are argued, by some, to be completely unsustainable and unrealistic.;
- The Options presented are unsubstantiated in sustainable development terms, being based purely upon growth scenarios and not, for example, any proper assessment of the impacts of each upon environmental capacity. A balance is needed.;
- The Options need to be clearly linked to infrastructure provision including raw materials;
- A number of representations expressed concern that Option 3 was just dismissed as being too ambitious and not seriously assessed, when it is the only one that fits with the Vision;
- A compromise option put forward by a number of representations is one between 2 and 3.: An option based on 2 but with a managed ambition to pursue 3.;
- Other options include a more sustainable option, an enhanced critical mass such as at Carrington, or an option commending the idea of the Garden City.

General

11.2 There were 41 direct responses to the question on preferred options (question 9). Of these responses almost half preferred Option 3 and just under 20% (8 responders) preferred Option 1. There are a number of common issues put forward that relate to all the options.

11.3 There was disappointment expressed that neither option 1 nor 2 seek to align growth with the vision of the GMSF to compete successfully on a global scale. This was felt to constrain aspirations of the Northern Powerhouse, devolution agreement and the GM Growth Deal. It is suggested that all options should be tested against these stated ambitions of sustainable growth. This would be a much needed and bold step change in GMSF's approach to facilitating economic growth.

11.4 Deliverability at the local and strategic level is seen as crucial. Without assurance regarding the deliverability of sites the assessment of Options remains an almost futile exercise. The document assumes an existing bank of land despite there being no evidence that this is the case and that the majority of the supply will be found to be either brownfield (now largely unviable without public funding) or has no planning status.

11.5 A number of responses called for further assessment of all options as to how well they contribute to the achievement of sustainable development to support the Northern Powerhouse in accordance with NPPF. This would include a SHLAA that has been scrutinised by the development industry, inclusion of the Deep Dives work and an SHMA. In

particular this would include targets for affordable housing and assess the health benefits of having the correct amount of housing. The GMCA should commission objective and independent forecasts of the economic potential and then use these forecasts to evidence demographic and socio-economic trends to identify the full objectively assessed need for housing and employment land in GM.

- 11.6 It was also argued that it is very difficult to rationally assess options when inadequate consideration has been given to understanding existing assets, the role that they play and the consequences for them of differing scenarios. The Options presented are unsubstantiated in sustainable development terms, being based purely upon growth scenarios and not, for example, any proper assessment of the impacts of each upon environmental capacity. A set of social, economic and environmental criteria should be established to ensure that the most sustainable GMSF is produced.
- 11.7 What is clear from numerous comments is that there needs to be a balanced approach between economic, social and environmental objectives and that any growth has to be realistic. Whichever growth option is chosen, it is essential to ensure that no irreplaceable habitats are destroyed and new developments are provided with ample green infrastructure.
- 11.8 This balance also has to be reflected spatially and there were a number of concerns of the effects on the emphasis on growth would have locally. For example, it was highlighted that over the period 2014-2035, Salford supplies the joint third largest supply of industrial and warehousing sites at 11% of GM's overall total provision. The second largest supply of sites for offices - 23% of GM's total; and the second largest number of sites for housing - 19% of GM's total. Seeking to increase these totals as is proposed in Options 2 and 3 raises serious concerns for the district. Similarly, the reality on certain communities is highlighted as a real concern in areas such as Saddleworth, with its own distinct character and community cohesion. Whether or not such levels of growth are achieved it is argued that this would still have drastic and irreversible effect on many local communities and environments.
- 11.9 Any option must have a mechanism within the assessment to ensure that there are the correct levels of infrastructure to support growth. GM should consider the advantages and disadvantages of each growth option, particularly in terms of existing transport infrastructure and networks so that they can be appraised in terms of their deliverability.
- 11.10 The call for further assessment is in part a result of what is argued by a number of responders as a lack of evidence. OAN for housing and economic development is not a complete or robust evidence base to provide due consideration of the options. The absence of a SHMA means that GMSF has considered only one aspect of housing need and the overall scale and other Local Plans have been found unsound due to this. It is therefore fundamentally flawed. It is also seen as premature to put forward any options for consultation in advance of a full and robust SHMA.
- 11.11 The absence of a full economic assessment means that the growth options are based on economic forecasts that only provide a starting point. The Deep Dive work is awaited and without its findings informing the options the Strategic Options document is flawed. Furthermore it was pointed out that some important evidence has not been published even though referred to (e.g. the GM Logistics Study) making it very difficult for stakeholders to give an informed judgment evidence base.

- 11.12 A general lack of engagement, particularly with the development industry and business community was also cited as a reason that it was difficult to reach any conclusions about a preferred option.
- 11.13 Whilst comments were predominantly critical of the approach there was some support for the evidence presented as set out in the options document and also in the OAHN. They consider that it has been prepared in the context of a robust assessment in the wider context for growth. The background information that supports the options consultation correctly identifies the migration and commuting relationship between areas outside of GM, such as in High Peak. Regeneris were commissioned to undertake a review of the GMSF documents and its consultants are satisfied that the GMCA has produced a comprehensive evidence base to inform the preparation of the GMSF. There was some concern, however, about the apparent disconnect between the comprehensive work, which informs the background papers, and the presented options in the Strategic Options document.
- 11.14 Some comments were put forward specifically about each option. These are now looked at in some detail.

Option 1

- 11.15 The majority of responders viewed this option as one that would lead to economic decline or, at best, very minimal growth. This was judged as being completely contrary to the Vision and not a genuine option. It is judged that Option 1 does not have any regard for the technical evidence base and does not reflect actual needs in accordance with the NPPF. As such it should be fully discounted. Furthermore it was argued that this option will not be found sound at examination and should not have been included within the consultation as an option.
- 11.16 A number of respondents stated that "*Option 1 would risk GM gradually falling behind the rest of the UK, which could make it increasingly difficult to attract and retain people and businesses.*"
- 11.17 It is argued that this scenario is fundamentally flawed and is set below the GM authorities' own assessment of housing need. The figures used but highlight that such an approach would either require neighbouring authorities to assist GM in meeting its objectively assessed needs through the Duty to Co-operate (increasing net commuter flows) or mean that GM was planning to fail.
- 11.18 There also needs to be spatial recognition that local authorities may have different limitations, capacity and competitiveness that needs to be overcome. In Option 1 it is highlighted that Tameside and Stockport combined would deliver just 10% of the housing need for the whole of GM over the life of the plan. It is argued that this is not fair. Further consideration should be paid to increasing the housing provision in some of the other authority areas through the release of greenfield sites within the urban area, which offer little to no amenity value to the wider local community, as opposed to widespread green belt release.
- 11.19 Whilst the vast majority of representations are against this option it does accrue some support. Option 1 is seen by a few as an absolute maximum and that GM should differentiate itself from many other city regions in the UK and elsewhere by embracing a truly sustainable vision of the future. This would build on Manchester's reputed 'radical' past with development being limited to existing sites and possibly some brownfield land or sites with derelict buildings on them. It is argued that better and more efficient use of land should be prioritised with limited encroachment into green belt and the countryside. The respondents noting this go

on to highlight, as an example, the many empty warehouses that are sited off Broadway in Oldham that could be used before encroaching on green belt.. Some think that Option 1 is more acceptable than Options 2 and 3, but only because Option 1 protects land in the green belt and countryside whilst still providing adequate housing provision and meeting climate change obligations. In terms of this obligation Mark Burton of Steady State Manchester highlights that the University of Manchester climate scientists Aderson and Bows have shown that *"continuing with economic growth over the coming two decades is incompatible with meeting our international obligations on climate change"*.

Option 2

- 11.20 As with Option 1 a number of respondents feel that Option 2 is flawed and should be discounted. They feel that it does not seek to align growth with the Vision of the GMSF to compete successfully on a global scale. Option 2 can be summed up as being unduly pessimistic, being *"timid"* or (having) *"no ambition"* as it is based on past trends with only marginal rates of increase. This option would result in only marginal increases on recent development rates and is not the transformational approach required for the Northern Powerhouse
- 11.21 It is argued that a more ambitious economic target is required with an upward adjustment of housing requirements for Manchester, Stockport and Trafford (giving evidence of monthly average rents and vacancy rates in these areas). Growth in housing stock would be below the national household growth of 0.9%, and widen the gap between GM and London. The level of growth proposed in this option is also behind Leeds, Bradford and Sheffield, seeing planned housing growth in Manchester falling behind its competitors.
- 11.22 A number of consultees say Option 2 is fundamentally flawed, particularly as it omits any possible affordable housing uplift, which means that its status as an OAN is legally questionable within the Northern Powerhouse agenda. Sensitivity testing carried out by Regeneris demonstrates that the overall housing requirement may have to increase to around 12,600 dwellings per annum across GM, in order to achieve the stated economic growth rate in Option 2. As a result they think that this option should be discounted as an option for growth.
- 11.23 Furthermore it is stated that the dismissal of the AGS-High and even the AGS-Higher economic growth scenarios in Background Paper 2 is made far too readily.
- 11.24 There are a number of responses regarding option 2 that contradict the views outlined above.
- 11.25 A few responses have major issues with the way the housing and employment land figures have been interpreted and cannot support the higher levels of growth proposed in Options 2 (or 3). NPPF and Planning Practice Guidance is used to emphasise that only future scenarios that could be reasonably expected to occur can be planned for. Options 2 and 3 are argued to be completely unsustainable and unrealistic.
- 11.26 A number of responses have highlighted concern with the capacity of the infrastructure, resources and environmental capacity with the higher growth options. It is argued that raw materials (such as bricks) and labour do not exist for such levels of growth and the development industry has never yet met such housebuilding figures. It was also highlighted that during the examination in public into the last North West Regional Spatial Strategy, the Environment Agency expressed grave concerns to the panel of planning inspectors about being able to supply sufficient water to and get waste away from the numbers of houses that

were being proposed. Numbers that were much lower than are currently being proposed in Options 2 and 3. It was also pointed out that, should future needs be greatly increased, a review of sections of the GM Minerals Plan would be required.

- 11.27 However, there is some support for this option. The option is seen as *“a positive option in trying to boost economic growth and prosperity at an attainable level”* It also appears to present a more sustainable growth level for GM as a whole. Option 2 is well researched and sets challenging targets, but with political commitment across the districts this could be achieved.
- 11.28 A number of representations support option 2 if this is taken as a minimum, and not a ceiling of growth and development, with a managed ambition to pursue option 3. Symphony Housing Group think that it is seen as the most sensible and achievable option, but necessitates a Green Belt Review. A number of others also emphasise that any development should provide green infrastructure as a significant and integral component.

Option 3

- 11.29 A number of representations suggest that Option 3 is the only option presented that closely aligns housing and economic growth with the Vision of the GMSF. They were all concerned that the GMSF dismisses the option on the basis of it being too ambitious, requiring the release of large areas of green belt land and its potential impact on infrastructure. An advantage of option 3, however, is that large, strategically located sites for industrial / warehouse development will be more readily accommodated and would ensure GM is more likely to become more economically self-sufficient, driving greater opportunity for GM citizens. In terms of housing it is viewed by some that this option would ensure a range of choices in terms of location, type and tenure of new houses essential to attract and retain a varied labour supply in GM. This would help to realise growth potential and be a boost to the construction industry.
- 11.30 The figures for 2004-14 used as a comparison are argued to be affected by restrictions imposed by authorities and the decrease in construction resulting from the recession. Therefore, the increase of 116% for the 'growth figures' is not a reasonable comparison and with international migration the proposed figures may indeed underestimate demand.
- 11.31 A number of representations raise serious concerns about how the growth options have been presented in a misleading way, and that generally the consultation document does not seek to undertake a serious assessment of Option 3. It is dismissed too readily and primarily on the basis of it being too ambitious, requiring the release of large areas of green belt land and potential impacts on infrastructure. It does so without any regard for evidence (e.g. in the absence of a Green Belt Review or an infrastructure study). The Home Builders Federation go on to say that there is incorrect reference to their economic footprint report, which they are happy to discuss further.
- 11.32 Reference to Option 3 doubling the size of GM by 2073 is objected to and the presentation of the growth option is inaccurate and should be withdrawn from the document.
- 11.33 A number of representation, however, think that Option 3 is overly ambitious and stretches the boundaries of credibility to an untenable extent so that the figure is not an objective, evidence-based assessment. It was also felt that it does not represent a credible option for housing provision. It is unachievable without at least acknowledging the challenge to deliver this option. It would require substantial green belt release across GM, possibly meaning that

adjoining districts would be unable to deliver their own OAHN. It is argued that it is “*complete fantasy to imagine the conurbation could double the number of dwellings in just 45 years as proposed by Option 3*”.

Other options

11.34 The consultation also allowed for consultees to put forward alternative options as outlined below.

11.35 A number of representations suggest that the GMSF should represent an option that lies between the second and third option, with further consideration of employment-led growth scenarios and scenarios with varied headship rates, as well market signals adjustments.

11.36 A number of consultees suggest that GMSF should set aside enough land for high growth but only release it in batches to satisfy market demand, to maintain agglomeration and discourage a ‘boom and bust’ cycle of development. It is argued that this approach could be applied sub-regionally and where there is over development in one area the slow release of further land could encourage development moving to areas where development has been slower. In summary, a growth scenario based on Option 2 but with a managed ambition to pursue Option 3. One more detailed suggestion is an ‘Option 2.5’, with 282,000 net additional dwellings (13,428 net additional dwellings per annum); 5,194,847m² of new industrial and warehousing floor space (247,373m² per annum); and 3,495,134m² of new office floor space (166,434m² per annum).

11.37 Other suggested options include:

- An option be included that is compatible with an 80% reduction in carbon emissions by 2030 and a 100% reduction by 2050;;
- Any preferred option should be carefully balanced against the other elements of sustainable development, including the conservation and enhancement of the historic environment as required by the NPPF;;
- Potential to grow the existing settlement of Ashley as an existing sustainable settlement. Given the single and unique land holdings of this area as shown on a plan, the extent of growth achievable for Ashley could be strategic and effectively create a significant, sustainable, mixed-use settlement with an existing heart;;
- A figure between Option 1 and the NW Regional Spatial Strategy figure for the years up to 2021 – and hold regular reviews of figures feeding into this;
- A policy on growth scenario that seeks to achieve the GMSF Vision and Northern Powerhouse ambitions, such as one providing for 13,500 - 14,000 dwellings per annum. This would be as a minimum, to replace Option 2;;
- An enhanced critical mass of housing, employment and support services as a catalyst for the renaissance of Carrington village;
- A need to adopt a radically different approach, such as the idea of a new model of the Garden City, as a re-working of the entirety of the GM land-space. In this the principle of zonal subsidiarity is central;;
- An option that would constrain development land, encouraging higher densities, and more efficient use of space. Closer integration will make it easier to service developments, provide high quality infrastructure, and sustainable transport facilities. It is argued that evidence suggests that if more land is made available in peripheral locations (which will be easier and cheaper to develop) it will be more attractive for builders and developers than brownfield sites. There is likely to be a lot of pressure to allow this particularly for the high growth scenarios and it should be resisted;;

- A series of alternative housing targets based on Option 2 should be considered. These should ideally consider alternative targets both above and below Option 2 taking into account the findings of the 'Call for Sites' and reflect that an even rate of delivery over 20 years will not be achievable.

12. SUMMARY OF ISSUES RAISED IN RELATION TO THE BACKGROUND PAPERS

Background Paper 1: Area of Assessment

- The evidence highlights the substantial differences in terms of migration patterns and to some extent travel to work of the northern part of GM compared to the southern part. Clearly these differences should be taken into account when thinking about spatial distribution of the housing and employment requirements. This will lead to higher growth and need for houses in these areas e.g. Trafford. The point is also made that the Travel to Work Areas (TTWA's) have recently been amended and these changes need to be taken account of in the evidence.
- The House Builders Federation (HBF) notes that the paper provides a significant amount of data in an attempt to justify Greater Manchester as a single Housing Market Area (HMA). This masks substantial differences between the various parts of GM. They add that the SHMA produced in 2008 is discredited within the background paper as being overly complex and providing arbitrary boundaries. Whilst boundary issues may be apparent the HBF consider it provides a better reflection of the actual market compared to a single HMA.
- Further objections to a single HMA and Functioning Economic Market Area (FEMA) note that the 2015 Rochdale and Wigan SHMAs both suggest the Boroughs are effectively standalone HMAs. This appears to be inconsistent with the conclusions of Background Paper 1 and undermines the accuracy and robustness of the GMSF evidence base. Such comments are linked to a rejection of the conclusions reached in Paper 1 that there is considerable scope for redistributing household growth around the sub-region and consider that need should be met as and where it arises.
- There are concerns that, despite the detail in the Background Paper regarding migration and commuting, nothing is said about home working.
- Cheshire East Borough Council welcomes the detailed evidence that underpins the GMSF. There are some specific technical issues with certain aspects of the supporting documentation which they intend to raise as part of their ongoing duty to cooperate discussions.
- Support is given for the continued acknowledgement of the Salford Quays and Media City as a core assessment area within the regional centre.

Background Paper 2: Economic Development Needs Assessment

- There was significant crossover in relation to the comments made on both the economic and housing background papers given the link between job growth and the need for housing.
- An overall view is that the GMSF represents a critical opportunity for AGMA to align job growth and household growth, and it is essential that the stated ambition of the city-region becoming one of the most successful cities on a global stage is central to the GMSF. The evidence base needs to fully consider the full extent of the growth planned to achieve those ambitions.
- A point raised is that there is too much focus on housing delivery and not enough on the job creation. The emphasis must be on jobs first and housing second. Too many employment sites are closing and being developed for housing. If town centres and high streets are to survive, we must get back to the point where well over 60% of the working population, of an area, can be found working in that area. A further point made is that consideration should

also be given to what opportunities exist to change economic/ housing market relationships over time through regeneration, to achieve a more strongly integrated economy and labour market.

- Views are given that the GMSF is not being ambitious enough about how its economy could perform and its population could grow and this could result in a relative shrinkage of the population compared to more dynamic parts of the UK. There is a general view on the appropriateness of the Economic Development Needs Assessment, which appears to be based on past trends (which themselves have been impacted on by the recession) and does not take into account the likely economic activity over the plan period and the ambitions of a Northern Powerhouse. A rate of growth in GM well in advance of the UK and potentially close to or equal to London would be needed to provide a strong motor at the heart of the Northern Powerhouse. There is a view that 'game changers' such as HS2 and HS3 have not been taken fully into account, although an alternative view on this makes the point that such infrastructure projects in other countries have had greater benefits for the capital than the sub-regions. The higher than average GVA growth rate appears to be due to the ambitious move towards the future UK average employment rate, rather than a rate of increase in productivity per job above the UK average. The assumed increase in employment rate is ambitious and appears unrealistic and risky. Based on plausible alternative assumptions the same economic growth rates might require significantly more housing than assumed for Option 2. Points are also made that the evidence does not take sufficient account of people over 65 remaining in work or the issue of 'double jobbing'. Several objectors conclude that the AGS-High Scenario should be considered as a minimum for employment growth whilst there is also support for a position somewhere between Options 2 and 3. Past take up in terms of offices would imply that the AGS growth rate is more appropriate.
- There are concerns that no detailed breakdown is provided for any of these scenarios at a district level, making comparisons with the demographic outputs difficult. There are also concerns that where labour force supply is less than the projected job growth could result in unsustainable commuting patterns and could reduce resilience of local businesses. In addition not enough consideration is given to the well identified key spatial economic and property market drivers or the impact of lifestyle changes such as increases in home working.
- The growth of the industrial and warehousing sectors has been constrained to date by a lack of high quality accommodation and the availability of large, developable sites in suitable locations. Not sufficient reference to the growth sectors of professional, scientific and technical and business, administration and support services is made. There is a view that there is too much emphasis on logistics. A key message is that there need to be an emphasis on the need to ensure an adequate labour supply both in terms of size and nature.
- Economic growth needs to be balanced against environment capacity in order to achieve the ambition for Greater Manchester to be one of the World's leading regions as set out in the Vision.
- In terms of more site specific comments, there is support for the recognition of Carrington within the GMSF as a suitable site for delivering industry and warehouse development along with significant infrastructure improvements which will deliver economic growth and act as a catalyst for regeneration. Also support for the identification of Salford Quays as one of the foremost locations for meeting economic development requirements with particular emphasis on its suitability for office development. CPRE consider that the claims made in para. 3.13 in respect of the Manchester Ship Canal lack foundation. There are no proposals to deepen or widen the Manchester Ship Canal in order for it to handle bigger vessels and therefore cargo coming into the new deep sea facility at Liverpool on the mega size ships will have to be off-loaded there. CPRE has always supported making more use of the Manchester Ship Canal for freight but is realistic about what it is possible to achieve.

Background Paper 3: Objectively Assessed Housing Need

- The evidence base underestimates the growth in population and households and therefore underestimates the amount of additional homes required over the plan period.
- It is considered that the Background Paper informing the OAN does not seek to align the aspirations of the GMSF and is based upon the continuation of past economic performance that has been influenced by recessionary trends, and planning policies which have contributed to a shortage of housing.
- Additionally planning for the demographic trend baseline is only likely to perpetuate trends, rather than meet the opportunity Manchester has to become a genuine economic powerhouse.
- The staged approach to identifying housing FOAN has not been properly applied. The clear evidence of demand pressures in many parts of the conurbation has been ignored.
- Comments are made that a full SHMA should be undertaken and the full affordable housing need provided for. The total housing land supply identified does not consider deliverability or developability and it is unclear how they have been identified by the LPAs involved. The apparent reliance in Paper 3 of high density apartments to meet the future housing FOAN is not supported by any analysis as to whether this is viable nor whether this matches the dwelling aspirations of GM residents. Any revised density assumptions should seek to consider the overall mix and type of properties required in GM, including the need for traditional family housing and older persons housing. A specific point is also made in terms of the importance of the universities and it is therefore imperative that University accommodation is provided and sustained to support future growth.
- It is considered inappropriate for the GMSF to be prepared on the basis of not meeting full OAN. Some comments disagree with the conclusions of the consultation document that market signal uplift is not justified. A market uplift must be applied within areas of the city region experiencing housing market stress e.g. the southern housing market area where worsening affordability has far outstripped national trends. It is unclear whether any district level checks have been conducted to establish extent to which implied district OAN numbers are consistent with district level employment forecasts, and the extent to which GMSF is proposing to use these implied OANs as targets for districts or whether any transfer of numbers is envisaged across district boundaries. It is asserted that the significant benefits arising from releasing land in the Green Belt for housing development significantly outweigh the adverse impacts of releasing land from the Green Belt
- It is considered that increasing the supply of financially viable and attractive sites within the sub-region would go a long way to increasing delivery rates within GM. It is considered that the identification of broad locations for future housing and employment development in the GMSF will support the delivery of housing and economic development in GM. There is a particular need to identify additional land in stronger markets within GM. Other areas of focus/growth have also been specifically identified in some of the comments e.g. the south of the city region, Salford Quays and Media City, and Bury-
- It is considered that to continue to prepare the GMSF where it is acknowledged that there is an insufficient housing supply to meet the identified OAN is contrary to the core principles that underpin the NPPF. To base strategic growth options, including the future provision of housing on out of date evidence, and prior to the publication of the SHLAA is considered illogical and unsound. Concern is also raised as no attempt is made to set out the likely delivery timescales of the supply.
- The GMSF should not seek to release employment land for housing to the detriment of the supply of land for future employment development
- The methodology used for calculating housing land supply varies between districts. A singular methodology should be used by all districts to ensure a consistent assessment. It should also

be noted that adjoining authorities are unlikely to be able to accommodate any significant quantum of GM housing requirements.

- The lack of any uplift in the OAN to take account of affordable housing need is considered to be contrary to NPPG. Reference made to the *Satnam v Warrington BC (2015)* which clarifies that affordable housing need should form a component of the OAN.
- Views on the HMA vary. Some state that the evidence does support the existence of separate housing markets affecting different parts of the conurbation whilst others consider it is more sensible to look at the GM conurbation as a whole. A point is made that it is also important to explicitly recognise that there are functional relationships and influences beyond the 10 GM Local Authorities, particularly with areas such as Cheshire East, Rossendale and High Peak.
- The 2012 Sub National Household Projections (SNHP) are used to define the housing OAN. This should be the starting point with consideration given to other factors also.
- The 2012 SNHP will have been heavily influenced by the preceding 5 years which were in recession. Plans should not be made on the basis of perpetuating recent negative past trends forward. Such an approach has been rejected by Local Plan Inspectors (e.g. Derbyshire Dales EIP)
- Need to consider the impact this had on particular age groups i.e. the 25-34 year old age group should be considered further as it traditionally has the highest propensity to form households and take up jobs but was particularly hard hit by the recession.
- The background paper states that GM is losing around 5,000 working age people a year to other areas and the GMSF appears to justify the continuation of this trend.
- Migration assumptions that have underpinned the evidence have been shown to be flawed as they reflect a period of suppressed household formation and internal migration rates, and seriously under-estimate levels of net international migration.
- National assumptions within the 2012 projections regarding immigration into the UK are lower than actual trends and therefore figure for GM is likely to be an underestimate. Net international migration in the period 2012-2015 has been very high. This needs to be addressed in respect of the GMSF evidence base.
- View that the GMSF approach of projecting forward average flows taken over the ten-year period 2002-2012 for the years 2014-19 only with a full return to 2012-based projections (i.e. 150,000 per annum) by 2023 is fundamentally flawed. The two main flaws being that firstly the ten-year average flows should be taken from the most recent database available rather than the period up to 2012, thereby reflecting recent peaks. Secondly, there is no evidential basis for anticipating that levels of net immigration will fall to 150,000 per annum. A 5-year growth followed by a long term decline appears arbitrary
- The 2012-based projections do not take any account of the substantial shortfall in housing delivery across GM.
- There is no justification for not seeking to return growth to the 2008-based household formation rates which was a more 'normal' period of growth.
- The 2014 based national population projections show much higher levels of international migration than the 2012 based projections. Therefore the plan should proceed with a higher international migration assumption in line with that now adopted in the 2014 based projections.
- The issue of Unattributable Population Change (UPC) and its treatment in demographic projections is one which GM authorities still need to consider. While the ONS decided at a

national level to exclude UPC from the population projections, this does not automatically mean it is the correct decision at the local level.

- There is market signal evidence suggesting that some of the districts underprovided new homes in the past. Therefore at least some market signal adjustment is warranted and this needs to reflect those parts of Greater Manchester where there is strongest evidence that need has been suppressed.
- Need to consider the population implications of an ambition which seeks to attract and retain residents.
- The population growth rate of Option 2 is 0.5% pa over the period 2014 to 2035. This is well below the growth rate for England as a whole and all the high performing regions in the UK. The AGS-High scenario growth rate matches London, which would significantly contribute to rebalancing the economy.
- The three Oxford Economics growth projections have not been modelled in PopGroup with no valid reason offered for this disparity.
- Reference made to the findings of the Barton Willmore study which is considered by some to be robustly prepared and more consistent with national guidance and recent case law upon the derivation of the OAN.
- The HBF would also like to see further information upon the assumptions utilised for economic activity and commuting.
- Views that the FOAN for the Greater Manchester area is likely to be closer to the 16,000 dwellings per annum figure set out by Option 3 than the 10,350 dwellings per annum figure set out by Option 2, but that this figure must also be tested through the consideration of an economic-led analysis.
- There are also some views that a more conservative approach in terms of growth and the release of sites should be adopted. One comment is that new housing should ONLY be built on brownfield sites, which are abundant. Only when all brownfield sites have been used up should other areas be considered. In addition the CPRE cite work they commission in relation to the Sefton Local Plan which concluded that the proposed housing figure was actually double what it should be. It is feasible that the GM figures also represent an overestimation of what is required.

Background Paper 4: Infrastructure and Environment

- Investigation into the historical energy source of water power in this area of high rainfall is scarcely mentioned.
- The National Trust notes the absence of any reference to the historic and cultural environment. The single page in Background Paper 4 on the Historic Environment does not provide a comprehensive assessment of the resource itself says nothing about its condition and does not recognise the many wider social and economic benefits of the conurbation's unparalleled heritage resource. The importance of recognising the value of heritage assets is also raised by Historic England.
- There is no background document on Transport and the recent consultation on a Transport Vision that is referred to appears to have been partial.
- Technical Report 4 does not specifically address onshore hydrocarbons, which is a land use issue that will require specific consideration during the GMSF period and is sufficiently complex to require a policy and supporting justification.

- Pleased to note a reference to national character areas but it is not clear if there are any local landscape character assessments that should be included or if further assessment is considered necessary (Natural England)
- Impacts of air quality on the natural environment has not been considered, certain habitats are sensitive to changes in air quality.
- It is not clear if water quality, protected species and priority habitats have been considered. If this background paper is a presentation of the evidence base for the environment then there should be more information on these topics.
- Pleased to see reference to GM Wetlands here but this should be carried across to the plan itself. Consideration should be given to the proposed West Pennine Moors SSSI. Opportunities for ecological networks should be mapped and also details on priority habitats and species in GM. Check for SSSIs designated for their geological interests as there are some within GM.
- Should acknowledge that sometimes previously developed land can be an important wildlife habitat so this will require consideration.
- The paper misses the important link between energy generation and waste and the potential benefits for decentralised energy from this area
- Mineral and waste planning should be considered in Background Paper 4 because the Joint Waste DPD and Joint Minerals DPD were prepared some time ago before the GMSF and the level of economic and housing growth proposed in the GMSF will have an impact on mineral deposits and the generation of waste in Greater Manchester
- Whilst often desirable it should be noted that GI does not always have to be multi-functional to have value
- In terms of open land, whilst agricultural production is recognised; other significant roles are not; for example, in carbon storage and sequestration, water catchment management and nature conservation.
- The benefits from treating energy efficient domestic retrofit as a critical infrastructure priority should be emphasised,
- Some views that the document lacks ambition in terms of infrastructure types/solutions going forward e.g. GM underground system, LED street lights and local illuminations, use of electric vehicles (particularly taxis/PH /buses) and use of waterways
- The document should consider the environment impacts outside the GM area
- Section 16 needs to be significantly revised in view of the UK Government's recent actions: abandonment of a carbon capture and storage trial scheme; the reduction in subsidy/renewables obligation credits for renewable energy schemes; and planning policies which act against the ongoing development of onshore wind turbines.
- Support for the section dealing with transport. The need to promote cycling as a major transport mode with health benefits should be emphasised e.g. providing segregated cycle ways and promoting Intermodal transport hubs
- The Environment Agency welcomes the positive statement on climate change, particularly in relation to resilience/adaptation. Critical though will be the extent that this is taken into and across the wider GMSF and any associated implementation plans/strategies. Also offers support relating to critical infrastructure to deal with flood risk.

- Real opportunity could exist to ensure the GMSF aspirations around natural environment and green and blue infrastructure are taken forward in ways which cool urban heat island, remove air pollutants and even reduce vehicle emissions through provision of active travel opportunities
- Figure 5 does not contain a key and seems to just include the Yorkshire bits of the SPA/SAC/SSSI but not LWS which is not considered a great issue on a map of this scale. Also noted that the ecological framework is quite dated. In addition the Calderdale Wildlife Habitat Network map should be noted.
- The Environment Agency make some specific recommendations which are:
 - Recommend the following text for inclusion within the background paper: “In 2016 the updated North West River Basin Management Plan was published. This provides a framework for protecting and enhancing the benefits given by the water environment in the North West including Greater Manchester. It informs decisions on land-use planning and sets out the improvement requires in the local river catchments that will support a high quality network of blue infrastructure. It presents an opportunity for these improvements to be aligned to / compliment the growth and development ambitions of Greater Manchester alongside developing its economic, social and recreational attractiveness”.
 - In paragraph 9.5 recommend that this section specifically also refers to ‘enhancing and increasing’ ~~networks~~ ~~existing~~ ~~in~~ ~~the~~ ~~area~~ ~~to~~ ~~reflect~~ ~~the~~ ~~real~~ ~~need~~ ~~to~~ ~~offset~~ ~~the~~ ~~pressures~~ ~~from~~ ~~new~~ ~~development~~ ~~and~~ ~~address~~ ~~some~~ ~~areas~~ ~~of~~ ~~current~~ ~~deficit~~, both in terms of extent and functionality.
 - Page 13 recommend that the reference to additional costs is replaced with the following paragraph: “This identifies likely remediation costs associated with different sites and development uses, which can be influenced by constraints such as Groundwater Source Protection Zones (see figure 7), depth to water table and the proximity of a site to a sensitive surface water, among other factors” . Alternatively we would recommend deleting the sentence including the additional costs associated with remediating land for residential development above ground water source protection zones which is the case for parts of Manchester, Stockport and Wigan(see figure 7.)
 - Section 15 Flood and Water Management. Flood risk infrastructure is not expressly covered here or in the Critical Infrastructure section. We recommend that this issue be reflected somewhere within the document as part of either section

Background Paper 5: Integrated Assessment

- Concerns about the lack of detail on containing pollution / particulates / carbon.
- That the most uncertainty lies with the environmental / ecological criteria, ref no.'s 9-18. In particular "Incompatibilities were identified between the draft GMSF objectives on Manchester Airport and IA objectives related to air quality and greenhouse gas emissions."
- That there is uncertainty in many areas of environmental concern on whether the impacts of the draft GMSF will be positive or negative. For example, on: sustainable transport; air quality; biodiversity; climate change; flooding; water resources; land resources; and sustainable consumption.
- Concern that the apparent compatibility between the GMSF and IA objectives is intentional in order to support the overall approach in the GMSF i.e. is not a true reflection of sustainability/environmental impacts.
- Historic England disagrees with the GMSF IA that the Framework’s vision is compatible (+) with the IA objectives (i.e. not in conflict) and can be achieved in parallel. The vision for Greater Manchester fails to mention how it will conserve and enhance its historic environment and retain its unique character and identity.

- Not enough consideration given to access to education and health facilities, particularly in relation to new development
- There needs to be a wider cross cutting recognition of infrastructure, buildings providing public and other services and the resilience of these in the context of a changing climate and the IA should consider this as plan develops
- When considering the Water Framework Directive there has to be a wider ecological status approach which would, amongst other things, consider modifications, riparian habitat areas as well as chemical/biological quality and water levels
- The EA raises issues in relation to some of the scoring (e.g. impact of climate change and flood risk in relation to social infrastructure, landscape and heritage and land resources) and recommend that further consideration is given to the compatibility at this stage. Is there an issue where possibly these IA objectives would constrain or impact upon levels of economic activity?
- EA also comment agree that there is insufficient detail at this stage to say how climate resilience or reductions in flood risk will be achieved when looking at various growth options. However, to be consistent with other IA objectives, particularly 10, 11 and 14, ask that reference is made that high growth or even option 1 could lead to negative impacts
- There needs to be a wider cross cutting recognition of infrastructure, buildings providing public and other services and the resilience of these in the context of a changing climate and the IA should consider this as plan develops.
- Greater Manchester Green Parties Forum comment that it is hoped that the GMSF can be strengthened in the ways the IA, and themselves, recommend.
- The IA has included some consideration to existing transport infrastructure uses and future demands. There is though further work required to ensure those demands are fully considered and addressed as the Framework develops.
- There are some site specific comments made in relation to the IA. This includes a view that the amount of building along the banks of the Manchester Ship Canal is unsustainable in terms of increased run off from new development, risk of flooding and their location deep in the moss lands.

Cheshire East Borough Council welcomes the detailed evidence that underpins the GMSF. There are some specific technical issues with certain aspects of the supporting documentation which we intend to raise as part of our ongoing duty to cooperate discussions.

Appendix A: List of Responders

Options Paper

Full Name	Company / Organisation
Mr Simon Plowman	2BG Ltd
Mr Andrew Ford	AFORDABLE HOMES
Mr Roger Bravey	Allotments Stockport
Anne McNally	Anne McNally
Mr Chris Hall	Arndale Properties Limited
Mr Matthew Waugh	Arqiva
	Aubrey Wise
B Turner	B Turner
Mr Craig Barnes	Barton Willmore
	Batley Properties Limited
	Bill Hetherington & Greenbank Partnerships
Mr. David Proctor	Blackburn with Darwen Borough Council
Bernard Greep	Bloor Homes and Jones Homes
Ms Elizabeth Shepherd	Bolton Friends of the Earth
C & J Bradley	C & J Bradley
Mr John Houston	Calderdale MBC
Mrs Debbie Fifer	Canal and River Trust
Wendy Cocks	Care and Repair England
	CBRE Global Investors
Cheshire East Council	Cheshire East Council
Ms Alison Marland	Chorley Council
Mr. Alan Chorlton	Chorlton Planning Ltd
Church Commissioners for England	Church Commissioners for England
Mr. Anthony Aitken	Commercial Estates Group
Ms. Claire Lowe	Corridor Manchester
Mr. Michael Durrington	Culcheth and Glazebury Parish Council
David Kemp	David Kemp
	Denton South Councillors
Dr Jeremy Carter	Dr Jeremy Carter
EDF Energy	EDF Energy
Elaine Hallows	Elaine Hallows
Ellandi LLP	Ellandi LLP
	English Cities Fund
Mrs Helen Telfer	Environment Agency
Frederic Robinson	Frederic Robinson
Chris Sinton	GL Hearn Limited
Ms. Nicole Penfold	Gladman Developments Ltd
Sophie Handler	GM Ageing Hub
GM Green Parties Forum	GM Green Parties Forum
GM Property Venture Fund	GM Property Venture Fund
Grasscroft Homes and Property	Grasscroft Homes and Property
Mr Fred Crawshaw	Great Places Housing Group
Mr. David Butler	GM Cycling Campaign
Mr Bernard Ekbery	GM Green parties Forum
Ms. Anne Selby	GM Natural Capital Group
Mr. Peter Davies	GM Waste Disposal Authority
Dr Andrew Taylor	Greenfield and Grasscroft Residents Association

Marlene Bailey	Greenfield and Grasscroft Residents Association
Mrs Julie Thompson	Hamilton Davies Trust
	Hardy Family
Mr. Rhian Davitt-Jones	Harworth Estates
Mr. Mark James	High Peak
Kristian Marsh	Highways England
HIMOR Group Ltd	Himor Group Ltd
Ms. Emily Hrycan	Historic England
Mr. Matthew Good	Home Builders Federation
Housing the Powerhouse	Housing the Powerhouse
	INEOS Upstream LTD
	intu Properties PLC
Mr. John Shephard	J & J Design on behalf of Manchester Gospel Hall Trust
Jean Kay	Jean Kay
Mr Richard Hollinson	Kirklees Council
Ms Barbara Keeley MP	Labour MP for Worsley and Eccles South
	Leigh Pemberton Estate
Liz Plevin	Liz Plevin
M Miles	M Miles
Maggie McKay	Maggie McKay
Manchester Friends of the Earth	Manchester Friends of the Earth
Jonny Sadler	Manchester: A Certain Future Steering Group
Andrew Moorhouse	Marple Civic Society
	McCarthy and Stone Retirement Lifestyles Ltd.
Messrs P and J Jeffries	Messrs P and J Jeffries
	Minerals and Waste Planning Unit
Mr Andrew Grundy	Mr Andrew Grundy
Mr Christian Name Kenneth Lowndes	Mr Christian Name Kenneth Lowndes
Mr David Leaver	Mr David Leaver
Mr David Steel	Mr David Steel
Mr Keith Williams	Mr Keith Williams
Mr Mike Holliss	Mr Mike Holliss
Mr Paul Jeffries	Mr Paul Jeffries
Mr Richard Fordham	Mr Richard Fordham
Mr Richard Venes	Mr Richard Venes
Mr Rob Hallows	Mr Rob Hallows
Mr William Griffiths	Mr William Griffiths
Mr. Ian Estall	Mr. Ian Estall
Ms Jane Douglas	Ms Jane Douglas
Ms Patricia Scott	Ms Patricia Scott
Ms Susan Hawksworth	Ms Susan Hawksworth
Colin Robinson	Nathaniel Litchfield and Partners
	National Federation of Gypsy Liaison Groups
Mr Alan Hubbard	National Trust
Ms. Janet Baguley	Natural England
Mr David Neame	Neame Sutton
Mr. Justin Cove	Nexus Planning Ltd
Mrs Andrea Hallissey	North West Counties Allotment Association
Ms. Christine Ellis	North West Planning Aid Service
Mr robin Lawler	northwards housing
Graham Bee	Orbit Development part of Emerson Group
Mr Andrew Coney	P Wilson and Company LLP

Pam Rimmer	Pam Rimmer
Ms. Louise Morrissey	Peel Group
Mr Sebastian Tibenham	Pegasus group
Mr. Sean McBride	Persimmon Homes North West
R Shenton	R Shenton
Rachel Jones	Rachel Jones
Mr. Tony Hothersall	Red Rose Forest
Mr Christian Name Kenneth Lowndes	Resident
Mr Christopher Self	Resident
Mr. Jonathan Bloor	Richborough Estates
Mr Phil Snowden	Road Haulage Association Ltd.
Ms. Clare Tostevin	Rochdale Boroughwide Housing
Wendy Cocks	Rochdale Community Energy Group
Anne Storah	Rossendale Council
Royal London Mutual Insurance Society Ltd.	Royal London Mutual Insurance Society Ltd.
	Royal Mail
Russell Homes	Russell Homes
Ms Pam Bailey	Saddleworth Parish Council
Dr Ray Hughes	Shaw and Crompton Parish Council
Ms. Hannah Richardson	Spawforths
Mr David Steel	Stamford Estate
Mr. Mark Burton	Steady State Manchester
Ms Sarah Knowles	Symphony Housing Group
	Tata Steel (UK)
Teignbridge District Council Simon Eaton	Teignbridge District Council
Ms Jackie Copley	The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
Miss Rachel Bust	The Coal Authority
Mr. Michael Kingsley	The Estate of Marques Kingsley Deceased
Mr Ross Anthony	The Theatres Trust
Mr David Dunlop	The Wildlife Trust for Lancashire, Manchester & North Merseyside
Mr Ronald Schwarz	Tottington District Civic Society
Mr Michael Chang	Town and Country Planning Association
Mr. Graeme Scott	Trafford Housing Trust
Ms. Jenny Hope	United Utilities PLC (Operations)
	UniteGroupPLC
Wainhomes Development Ltd	Wainhomes Development Ltd
Wallace Land Nicholas Maguire	Wallace Land Nicholas Maguire
Mrs Lucy Houghton	Warburton Parish Council
Mrs Joanne McGrath	Warrington Borough Council
Mr. Peter Richards	West Lancashire Council
	Willsgrove Developments Limited
Mr Nick Sandford	Woodland Trust
Yvonne Fovargue MP	Yvonne Fovargue MP

Background Papers

Name	Organisation
	Batley Properties Limited
Mr John Houston	Calderdale MBC
Cheshire East Council	Cheshire East Council
David Kemp	David Kemp
Mrs Helen Telfer	Environment Agency
Chris Sinton	GL Hearn Limited
Ms. Nicole Penfold	Gladman Developments Ltd
GM Green Parties Forum	GM Green Parties Forum
GM Property Venture Fund	GM Property Venture Fund
Mr Bernard Ekbery	GM Green parties Forum
Kristian Marsh	Highways England
HIMOR Group Ltd	Himor Group Ltd
Ms. Emily Hrycan	Historic England
Mr. Matthew Good	Home Builders Federation
	INEOS Upstream LTD
	intu Properties PLC
	Minerals and Waste Planning Unit
David Kemp	Mirrlees Field Friends Group
Mr Andrew Grundy	Mr Andrew Grundy
Mr John Mullen	Mr John Mullen
Mr Neil Openshaw	Mr Neil Openshaw
Mr Richard Venes	Mr Richard Venes
Mr. Steve Birchall	Mr. Steve Birchall
Mrs Frances Henry	Mrs Frances Henry
Ms Jacqui Greenfield	Ms Jacqui Greenfield
Colin Robinson	Nathaniel Litchfield and Partners
Mr Alan Hubbard	National Trust
Ms. Janet Baguley	Natural England
Graham Bee	Orbit Development part of Emerson Group
Ms. Louise Morrissey	Peel Group
Mr Sebastian Tibenham	Peel Group, DB Symmetry, Tatton Estates and Brookhouse Group
Mr. Sean McBride	DB Symmetry,
Prof David Yates	Tatton Estate Management Limited, and
R Shenton	Brookhouse Group.
Royal London Mutual Insurance Society Ltd.	Royal London Mutual Insurance Society Ltd.
Russell Homes	Russell Homes
Ms Sarah Knowles	Symphony Housing Group
Ms Jackie Copley	The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
Mr David Dunlop	The Wildlife Trust for Lancashire, Manchester & North Merseyside
	UniteGroupPLC
Wainhomes Development Ltd	Wainhomes Development Ltd

OPTIONS CONSULTATION WINTER 2015-16 RESPONSES

A full report outlining the range of responses received to the consultation in November 2015 has been prepared. The majority of responses related to the scope and content of the draft GMSF with more detailed responses to the 3 strategic growth options. All responses have been considered in the development of the Draft GMSF. The table below outlines the key messages from the consultation and how they have been addressed in the Draft GMSF.

General Comments	
<ul style="list-style-type: none"> Documents were difficult to understand. More accessible information, such as summary documentation, would be useful. 	<p>The general comments highlight that there are conflicting and contradictory views on many issues, reflecting the different priorities of a wide range of stakeholders</p> <p>We will endeavour to make documents as accessible as possible and to provide summary documents</p>
<ul style="list-style-type: none"> There have been no responses made to the 2014 consultation comments 	<p>Responses to the 2014 informal consultation on the evidence base were used to inform the November 2015 consultation on vision, strategic objectives and growth options.</p>
<ul style="list-style-type: none"> The objectives should reflect the differences between the ten GM authorities 	<p>The GMSF is a strategic document, not simply a collation of 10 local plans. It recognises that Greater Manchester comprises hundreds of different neighbourhoods, all with particular issues and priorities, but it focuses on those issues where there are shared objectives.</p>
<ul style="list-style-type: none"> GM should amend or broaden the scope to include the various suggestions that respondents have made The GMSF should clearly set out what it will and will not be dealing with The GMSF should clearly set out what the role of Local Plans will be; GM should clarify what is local and what is strategic 	<p>There were varying views on the scope of the GMSF with some respondents arguing for a wider scope and others for a more strategic approach with issues being dealt with at the lowest level possible</p> <p>The GMSF is being prepared as a joint Development Plan Document and its scope has been agreed by the 10 local planning authorities. The Greater Manchester Spatial Framework will set the context for lower level/district local plans and will cover;</p> <ul style="list-style-type: none"> set out how Greater Manchester should develop over the next two decades up to the year 2035 identify the amount of new development that will come forward across the

	<p>10 districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused</p> <ul style="list-style-type: none"> •support the delivery of key infrastructure, such as transport and utilities •protect and enhance the important environmental assets across the conurbation •allocate sites for employment and housing to be released from the Green Belt •define a new Green Belt boundary for Greater Manchester <p>The GMSF identifies strategic locations for growth and allocates sites for development which are outside of the urban area. Local Plans will continue to allocate sites within the urban area.</p> <p>The Local Development Schemes for each district set out the approach to local preparation.</p>
<ul style="list-style-type: none"> • GMSF must set out the scale and distribution of housing and employment for the 20 years following its adoption, not the next 20 years 	<p>The GMSF will set out the scale and distribution of housing and employment land for the period 2015-2035. Adoption is programmed for 2018 therefore the GMSF will provide a strategic context for 15+ years to inform local plans.</p>
<ul style="list-style-type: none"> • The ambition, vision and aspirations are constrained by the approach used to test the options • GM should consider having a 'Challenges' sub-heading in the Vision and Ambition chapter • GM should assess which growth options will deliver the Vision and Ambition, potentially through an independent commission 	<p>Greater Manchester is ambitious for its people and places and has an ambitious strategic vision articulated in the Greater Manchester Strategy and other documents, for example the Growth and Reform Plan. The preferred growth option is supported by appropriate evidence and was chosen by the GMCA as that which is considered to deliver the vision and ambition effectively</p>
<ul style="list-style-type: none"> • Respondents wanted to ensure that the Duty to Co-operate is fully met, with GM engaging with adjoining authorities and private sector, such as the house building industry, effectively 	<p>There is ongoing discussion and dialogue with our neighbouring authorities as required under the duty to Co-operate. Discussions have taken place with the development industry collectively and through individual district meetings however mechanisms are being established to enable more effective engagement over the next 12 months.</p>
<ul style="list-style-type: none"> • Strategic Development Management policies should be included in the GMSF 	<p>The Draft GMSF does not contain Development Management Policies, it provides the context for these to be prepared by individual districts is set by the GMSF</p>
<p>Area of Assessment</p>	
<ul style="list-style-type: none"> • Greater Manchester should not be looked at as a single HMA • GM consists of at least 4 HMAs 	<p>In preparing the evidence base we have considered previous work that has been undertaken both at the regional/sub regional and local level.</p>

<ul style="list-style-type: none"> • Regard should be given to each Local Authority SHMA; • Look at a neighbourhood approach to the GMSF with 'bottom-up' evidence base 	<p>We believe that our evidence supports the definition of Greater Manchester as a single housing market area and that this is in line with NPPF and PPG.</p>
<ul style="list-style-type: none"> • Evidence highlights the substantial differences in terms of migration patterns and to some extent travel to work of the northern part of GM compared to the southern part. Clearly these differences should be taken into account when thinking about spatial distribution of the housing and employment requirements. 	<p>We have published a SHMA which explores these issues.</p>
<ul style="list-style-type: none"> • Some GM housing markets are impacted by areas outside of GM • Look at the potential of meeting some of GMs OAN in areas outside of GM. 	<p>We have ongoing discussions with neighbouring authorities about cross boundary planning issues We have ongoing discussion with neighbouring local authorities and recognise that there are cross boundary issues where we need to co-operate. To date none of our adjoining neighbours has indicated that they have capacity to accommodate any of our housing requirement.</p>
<ul style="list-style-type: none"> • Without a SHMA or a SHELAA there cannot be a clear understanding as to the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period • Large, family homes are required; 	<p>We have published a SHMA and information on our land supply as part of the consultation on the Draft GMSF.</p>
<p>Economy and Employment</p>	
<ul style="list-style-type: none"> • Recognise the substantial growth in emerging sectors – such as innovation and technology, creative and digital industries, and life sciences – and how this will affect demand for modern workspaces; 	<p>The Deep Dive Phase 1 report explores these issues and has informed the strategy in Draft GMSF. The Deep Dives Phase 1 are published as part of the evidence base.</p>
<ul style="list-style-type: none"> • Recognise the ambitions of the Northern Powerhouse • Consider the full extent of the growth planned to achieve global city status. There is too much emphasis on past trends; 	<p>Greater Manchester is nationally recognised as being an ambitious and innovative city region as demonstrated by our ground breaking devolution agreements. The GMSF is not a stand alone strategy but is integral to Greater Manchester's overall approach to Growth and Reform and reflects the ambitions to become a net contributor to the UK economy by growing sustainably and inclusively.</p> <p>We have considered all comments received and reviewed our evidence, specifically challenges around our ambition for growth and what scale of growth we need to aim for to maximise our position as the engine of growth driving the Northern Powerhouse.</p> <p>The economic forecast was updated (Accelerated Growth Scenario (AGS) 2015) by Oxford Economics and tested against a range of factors including the Northern</p>

	<p>Powerhouse Independent Economic Review; forecasts produced by other leading forecasting houses (Cambridge Econometrics and Experian); our assumptions around resident employment rate and the potential impacts of Brexit. We also undertook further work on population and household growth taking into account the 2014 SNPP (released May 2016) and the Sub National household projections (released July 2016). In line with our previous reports we modelled various scenarios using different household representation rates and also modelled the impact of the Government's Local Plan Expert Group (LPEG) recommendations which were made in spring 2016.</p> <p>Having completed this additional work it was concluded that the ambition set out in the AGS 2015 whilst challenging, is robust and necessary to demonstrate our continuing role in driving growth in the north of England. The AGS 2015 also delivers on Greater Manchester's ambition to increase the resident employment rate to ensure that more residents share in the benefits of economic growth.</p>
<ul style="list-style-type: none"> • Make more reference to the city centre and regional centre as key drivers of the regional economy; • Recognise that a regional centre- based economic plan will increase the need to travel and drain resources from the rest of GM / NW; • Address the tourism economy in urban areas outside Manchester city centre; 	<p>The importance of the City Centre to the future success of Greater Manchester is recognised in the Strategic Locations policy.</p> <p>The GMSF is a plan for inclusive growth seeking overall growth by promoting competitive locations as well as accelerating growth in those areas performing weakly.</p> <p>The GMSF also recognises the role of tourism in GM.</p>
<ul style="list-style-type: none"> • Highlight the explicit link between house building and economic growth; • Assumptions made about some of the factors that link housing/population to need to be sensitivity tested; • Analyse how planned investment will impact upon jobs growth and labour force supply; • All economic scenarios be subject to PopGroup modelling; • Explicitly support the ambition to increase the skills of GM's workforce; 	<p>We have considered all comments received and reviewed our evidence, specifically challenges around our ambition for growth and what scale of growth we need to aim for to maximise our position as the engine of growth driving the Northern Powerhouse.</p> <p>The economic forecast was updated (Accelerated Growth Scenario (AGS) 2015) by Oxford Economics and tested against a range of factors including the Northern Powerhouse Independent Economic Review; forecasts produced by other leading forecasting houses (Cambridge Econometrics and Experian); our assumptions around resident employment rate and the potential impacts of Brexit. We also undertook further work on population and household growth taking into account the 2014 SNPP (released May 2016) and the Sub National household projections (released July 2016). In line with our previous reports we modelled various scenarios using different household representation rates and also modelled the impact of the Government's Local Plan Expert Group (LPEG) recommendations</p>

	<p>which were made in spring 2016.</p> <p>Having completed this additional work it was concluded that the ambition set out in the AGS 2015 whilst challenging, is robust and necessary to demonstrate our continuing role in driving growth in the north of England. The AGS 2015 also delivers on Greater Manchester's ambition to increase the resident employment rate to ensure that more residents share in the benefits of economic growth.</p> <p>Work on economic forecasting takes into account the need to ensure that there is a labour supply adequate to meet the job requirements and adjust migration/commuting assumption if not. A key objective of the Greater Manchester strategy is to enable all residents to participate and contribute to economic success. It is the ambition that a significant number of the jobs created will be taken by Greater Manchester residents who are not currently working.</p>
<ul style="list-style-type: none"> • Emphasise the economic impacts of significant infrastructure projects such as High Speed 2; 	<p>Opportunities offered by significant infrastructure is acknowledged particularly HS2 in the City Centre and Airport Gateway policies.</p>
<ul style="list-style-type: none"> • The issues of retail and leisure should be addressed in further detail; 	<p>The Draft GMSF contains policies on Retail/Culture/Tourism. The GMSF is not identifying a retail hierarchy below the City Centre and principal town centres and is not identifying a retail floorspace requirement for each district. This will be dealt with through local plans.</p>
<ul style="list-style-type: none"> • A more thorough assessment of the quality and viability of employment land this supply is required. • The economics of viable and deliverable development should be identified; 	<p>The viability of employment land is under constant review.</p>
<ul style="list-style-type: none"> • Incorporate the issues raised in the consultation, such as addressing the low wage economy, land for food production and the implications of an older working population in the future; • Refer to culture and its link to employment needs; 	<p>The Draft GMSF is a spatial planning document which will be supported by other plans and strategies.</p>
<ul style="list-style-type: none"> • Plan sufficiently for the logistics sector; • Growth of the industrial, warehousing, logistics and manufacturing sectors have been constrained by a lack of high quality accommodation and the availability of large, developable sites in suitable locations; 	<p>The Draft GMSF identifies a significant supply of land for industry and warehousing uses (including logistics) across the conurbation. This section of the plan is supported by appropriate evidence</p>
<p>Environment</p>	

<ul style="list-style-type: none"> • It is considered that the strategy is overly dominated by an economic agenda, with environmental and social factors not being given equal consideration; • GMSF should make specific reference to synergies between with climate change mitigation / adaptation; • There is a lack of clear commitment to addressing climate change within the Vision and ambitions, pointing out that despite climate change is being a crucial factor in their achievement;. 	<p>Draft GMSF acknowledges the central importance of Greater Manchester's environment to its sustainable future, and the threat that climate change plays in this. Mitigating and adapting to climate change is a cross cutting theme through the GMSF.</p> <p>In addition to policies around Strategic Locations for Growth and thematic policies around offices, industry and warehousing and housing, the draft provides the policy framework to protect and enhance key assets and increase the resilience of Greater Manchester's places and people through the following policies:</p> <p>Green Infrastructure, Nature Conservation, Trees and Woodland, The Uplands, the Lowland Wetlands, River Valleys and Canals, Carbon Emissions, Resilience, Air Quality, Flood Risk and Water Quality, Design, Heritage, Education, Skills and Knowledge, Health and Social Inclusion. The plan is supported by appropriate evidence</p>
<ul style="list-style-type: none"> • GMSF needs to strengthen its approach to waste management and the role of energy from waste; 	<p>Waste anagement is covered in the GM Waste Plan.</p>
<ul style="list-style-type: none"> • GMSF needs to acknowledge an increased surface water flood risk through new development; 	<p>The GMSF recognises the importance of flood risk when planning new development with the inclusion of a flood and water quality policy</p>
<ul style="list-style-type: none"> • All parts of the GMSF should recognise the contribution of the landscape as an asset; 	<p>The GMSF recognises the importance of Greater Manchester's landscape scale assets and seeks to protect and enhance these</p>
<ul style="list-style-type: none"> • Opportunities for decentralised energy networks and both strategic and community- led energy schemes should be identified and enabled; 	<p>The GMSF requires developers to identify and plan for decentralised energy networks</p>
<ul style="list-style-type: none"> • Green and blue infrastructure assets – both individually and as a strategic network – are important, as are their role in people's physical and mental wellbeing ; 	<p>The GMSF recognises the importance of green and blue infrastructure assets</p>
<ul style="list-style-type: none"> • Inadequate reference is made to poor air quality. and that the credibility of the GMSF is reduced through contradictory statements, where it suggests addressing air quality issues is a priority and yet discusses is reduced by contradictory statements relating to increased air travel and more road building; 	<p>The GMSF recognises the need to ensure that growth is sustainable. References to increased air travel are reflective of something which GMSF needs to have regard to rather than something which GMSF itself proposes or creates.</p>
<ul style="list-style-type: none"> • It should be recognised that heritage assets are an important element of green infrastructure as they generally preserve both cultural and historically significant assets; 	<p>The GMSF recognises the importance of heritage assets</p>
<ul style="list-style-type: none"> • Major environmental improvements are needed to enhance the function and ecological quality of GM river corridors and investment into upstream catchment areas.; and 	<p>The GMSF recognises the importance of GM rivers and upland areas.</p>

<ul style="list-style-type: none"> Addressing flood risk in GM requires a multi-agency cross-border approach. 	The GMSF recognises the importance of developing catchment wide solutions to flood risk
Housing	
<ul style="list-style-type: none"> A shortage of housing is the key constraint to quality of life across GM; 	Accelerating housing delivery is a key objective for Greater Manchester. We currently have land available for over 170,000 units with delivery of 5-6000 units per annum and GMSF will be allocating further land to ensure that needs and growth aspirations are met.
<ul style="list-style-type: none"> There is an over-reliance on middle- to high density development in the inner core; 	<p>Development of apartments at the core of conurbation is an important element of Greater Manchester's supply and the population of the City Centre has risen significantly over the last 20 years. The city centre will continue to be important for both employment and housing, supported by appropriate infrastructure.</p> <p>Draft GMSF provides opportunities for increased home building in every district to meet the wide range of demand</p>
<ul style="list-style-type: none"> GMSF is too focused on the number of new homes needed and no consideration is given to size, type, and tenure of this requirement; 	A SHMA has been published alongside the Draft GMSF, detailing matters such as size and type.
<ul style="list-style-type: none"> The type and location of new housing is critical to securing economic growth and tackling constrained labour mobility; 	Draft GMSF seeks to provide housing opportunities in strategic locations
<ul style="list-style-type: none"> GMSF does not make the fundamental linkages between housing and sustainable economic growth; 	The overall housing target set out in draft GMSF and its component parts are established with full regard to sustainable economic growth.
<ul style="list-style-type: none"> The document does not make enough reference to the relationship between transport infrastructure and development; 	There are close working arrangements with TfGM to ensure that Transport 2040 is aligned with GMSF
<ul style="list-style-type: none"> GMSF overlooks the health problems associated with a lack of appropriate housing provision; 	The Draft GMSF policy on health references the importance of good quality housing.
<ul style="list-style-type: none"> There is a clear role for GMSF in design and housing standards; 	Draft GMSF has a policy around design.
<ul style="list-style-type: none"> There is a need to address the criticisms of the OAHN modelling of demographics and the economy; There is an over-reliance on past trends and outdated growth assumptions; The assessment needs to reflect the consequences of past under delivery of housing; 	We have set out our approach to OAN in the SHMA and this is transparent and reasonable in the context of the evidence we have gathered and in relation to national guidance.
<ul style="list-style-type: none"> It is not just about new homes, it is also about the repair, renewal and replacement of existing homes; 	Draft GMSF is primarily concerned with new development.
<ul style="list-style-type: none"> There is concern with delivery that the current supply is not viable 	The Draft GMSF gives a strong priority to development in the urban area. There

and needs a comprehensive review;	are issues with the viability of some of this land however it is imperative that solutions are found and that sites are brought forward to improve the quality of our existing neighbourhoods and increase the choice of housing available across Greater Manchester. Greater Manchester is pursuing a range of initiatives to accelerate housing development including the Housing Investment Fund, the Land Commission, Memorandum of Understanding (MoU) with Registered Providers.
<ul style="list-style-type: none"> • The GMSF needs to reference housing construction and its economic impacts on local amenities via construction, labour 	This is out of scope of the GMSF
<ul style="list-style-type: none"> • Future delivery needs to attract households to the northern districts of GM to balance growth and redistribute supply. 	Draft GMSF sets out a strategy for inclusive growth
Place	
<ul style="list-style-type: none"> • Place-making issues are not given sufficient strength and importance in GMSF; 	Draft GMSF recognises the importance of place-making.
<ul style="list-style-type: none"> • There needs to be clarity around what sites are strategic and non-strategic; • There should be more reference to the city centre as a key driver of regional economy • There should be more reference to town centres as key drivers of their local economies and there was general support for the town centre first approach; • Media City and Salford Quays should rank alongside the commercial core of the City Centre as an office location due to its location and accessibility; 	The GMSF identifies strategic locations for growth (including the City Centre, The Quays and Town Centres) and allocates sites for development which are outside of the urban area. Local Plans will continue to allocate sites within the urban area
<ul style="list-style-type: none"> • Establish a more detailed evidence-led network or hierarchy of centres; 	The GMSF identifies Greater Manchester's principal town centres. The GMSF is not identifying a retail hierarchy below the City Centre and principal town centres and is not identifying a retail floorspace requirement for each district. This will be dealt with through local plans.
<ul style="list-style-type: none"> • The existing and future provision of industrial and warehousing development is biased towards the west and south-west of GM. Provision should be made in the east and north-east of GM too; 	Draft GMSF proposes significant provision for industry and warehousing in the north and east of the conurbation
<ul style="list-style-type: none"> • Respondents recognised that it was likely that not all development would be on brownfield land and argued that brownfield sites should be complemented with new settlements and sustainable urban extensions; 	Draft GMSF has a strong focus on development in the urban area however our evidence demonstrates that land outside of the urban area will also be required to meet our identified employment and housing land need. Green Belt release will be minimised. Our Green Belt assessment shows that all parcels of greenbelt

<ul style="list-style-type: none"> • Re-use existing buildings and previously developed land prior to greenfield land; and • The release of green belt land which is otherwise unconstrained should be prioritised ahead of the development of non-green belt land which would result in significant environmental harm 	<p>meet at least one of the purposes of Green Belt therefore we have taken a strategy driven approach and identified land which is, for example, of a scale to accommodate growth to support infrastructure and facilities; is well connected to existing public transport or can be made accessible; meets a strategic need to foster inclusive growth.</p>
Transport	
<ul style="list-style-type: none"> • There should be a stronger linkage with the Transport Strategy 2040; 	<p>There are close working arrangements with TfGM to ensure that Transport 2040 is aligned with GMSF</p>
<ul style="list-style-type: none"> • Transport should have its own theme alongside economy, place and people; 	<p>Draft GMSF contains a separate policy on 'Accessibility' although transport (and infrastructure in a wider sense) underpin several policies particularly the strategic locations and site allocations</p>
<ul style="list-style-type: none"> • The Strategic Objectives should make reference to the Metrolink and proposed expansion; 	<p>References to Metrolink are included, as appropriate, in the draftGMSF.</p>
<ul style="list-style-type: none"> • There needs to be a background document on transport ; 	<p>The GMSF is underpinned by the Transport 2040 evidence base which is comprehensive and wide ranging</p>
<ul style="list-style-type: none"> • There should be more emphasis on reducing the need to travel and modal shift; • GMSF needs strengthening in the area of sustainable transport; • GM should make a commitment within the GMSF to avoiding building- in car dependency in new developments; 	<p>Draft GMSF is committed to sustainable growth and recognises the important role of transport role in this.</p>
<ul style="list-style-type: none"> • Opportunities should be capitalised on (e.g. Manchester Airport, Port Salford and HS2/3); 	<p>Draft GMSF recognises the potential of significant infrastructure proposals</p>
<ul style="list-style-type: none"> • There needs to be reflection on the scale of congestion and, the issues it causes and the measures and investment required to resolve them; 	<p>Draft GMSF needs to be read alongside other GM plans and strategies including Transport 2040.</p>
<ul style="list-style-type: none"> • Recognise the role that aviation plays in creating carbon and other harmful emissions; and 	<p>Draft GMSF needs to be read alongside other GM plans and strategies including the Climate Change Strategy and low carbon Implementation Plan</p>
People	
<ul style="list-style-type: none"> • Add an ambition and vision to “improve the health and well-being of Greater Manchester”; • Include indicators to show increases in health, well-being and quality of life; • Include reference to mental health as a key goal of the strategy; • Increase focus on social objectives and how they integrate with 	<p>The GMSF is a strategy to deliver sustainable development and an improved quality of life for residents. The Draft GMSF contains policies around health, social inclusion, education and skills as well as accessibility, resilience and environmental quality.</p> <p>OAN methodology considers international migration (and it is still unclear what</p>

<p>growth priorities;</p> <ul style="list-style-type: none"> • Understanding the growth in certain groups and cohorts (e.g. older people); 	<p>impact Brexit will have on this in the long term) and household formation rates.</p> <p>The draft GMSF seeks to capture the benefits of growth for Greater Manchester by providing a good range of new housing types for economically active household</p>
<ul style="list-style-type: none"> • Seek to explore the reasons for past household formation rates and why the 2012-based projections forecast less population growth relative to previous household projections; • Evidence should assume higher levels of international migration coming into GM; • Need to consider longer trends in migration in order to address artificial impacts of the recession • More work required in relation to headship rates and the impacts of the recession; • GMSF should not be based on negative past trends in terms of household formation 	<p>The SHMA sets out our approach to population forecasts, migration and household formation.</p>
<ul style="list-style-type: none"> • Seek to reverse migration out of GM, particularly younger, economically active families 	<p>Draft GMSF sets out a strategy to meet a diverse range of housing needs including providing choice and opportunity for working households.</p>
<ul style="list-style-type: none"> • The Ambition lacks any counter-balancing statements, e.g. – for example, ensuring that no drive for growth will have deleterious impacts on health. 	<p>Comments noted</p>
<ul style="list-style-type: none"> • There is a need for a GM wide health strategy with the coordination of JSNAs through a GM wide assessment; 	<p>Comments noted, Draft GMSF needs to be read alongside other GM plans and strategies</p>
<ul style="list-style-type: none"> • There needs to be a specific reference to meeting an increasing older population who would not be in employment. 	<p>The SHMA, published alongside the GMSF identifies the needs of the older population.</p>
<ul style="list-style-type: none"> • Increase focus is recommended on social objectives and how they integrate with economic priorities. • Greater focus is required on the role that the historic and environmental assets play on social roles. • The GMSF should show how the provision of community infrastructure such as sports facilities across GM will be influenced; 	<p>Draft GMSF is a plan for sustainable development and sets out a strategy to achieve social and environmental improvements as well as economic growth. The Plan includes policies on heritage, social inclusion and infrastructure.</p>
<ul style="list-style-type: none"> • Include reference to the quality and quantity of education provision across GM. 	<p>Draft GMSF contains a policy of Education, Skills and Knowledge</p>
<p>Options</p>	

<ul style="list-style-type: none"> • The vast majority of representations are against Option 1 • As with Option 1, Option 2 has been discounted by a number of responders as not aligning growth with the vision of the GMSF to compete successfully on a global scale and constrains aspirations of the Northern Powerhouse, devolution agreement and the GM Growth Deal • Options 2 and 3 are argued, by some, to be completely unsustainable and unrealistic A compromise option put forward by a number of representations is one between 2 and 3: An option based on 2 but with a managed ambition to pursue 3 • A number of representations expressed concern that Option 3 was just dismissed as being too ambitious and not seriously assessed, when it is the only one that fits with the Vision 	<p>The November 2015 consultation tested 3 growth options. There was no consensus on which option was most appropriate although Option 1 was considered to be too low by the majority of respondents. We considered all of the comments particularly those in relation to Greater Manchester's growth ambition (outlined above) and the results of the Integrated Assessment report.</p> <p>We tested the assumptions we had made in our Accelerated Growth Scenario and benchmarked against other forecasts.</p> <p>Option 2 was considered to be challenging yet realistic but would require release of land outside of the urban area and the consequences of this would need to be assessed.</p> <p>Option 3 was considered to require a level of growth which was unachievable and would require release of land outside of the urban area of a significantly greater scale than Option 2 and, or alternatively, development at such high densities across the urban area that could not be sustained without undue impact upon existing residents, the environment, quality of design or the standard of housing.</p> <p>Draft GMSF is based on an updated Option 2 and tests the social and environmental implications of this.</p>
<ul style="list-style-type: none"> • The Options presented are unsubstantiated in sustainable development terms, being based purely upon growth scenarios and not, for example, any proper assessment of the impacts of each upon environmental capacity. A balance is needed. • The Options need to be clearly linked to infrastructure provision including raw materials 	<p>The consultation was on strategic economic growth options and did not seek to fully consider the social and environmental impacts of these.</p> <p>Draft GMSF considers the social and environmental impact of the preferred level of growth, through the Integrated Assessment.</p>
<ul style="list-style-type: none"> • Other options include a more sustainable option, an enhanced critical mass such as at Carrington, or an option commending the idea of the Garden City. 	<p>'More' sustainable options such as concentration on land in the urban area have been fully explored and we have looked at ways in which we could optimise the contribution of brownfield land. Our conclusion is that it is not possible to meet our Objectively Assessed Need for housing or employment needs purely within the urban area.</p> <p>Draft GMSF sets out a strategy for sustainable urban extensions including a critical mass of activity at Carrington and other locations, based on 'Garden village' principles.</p>