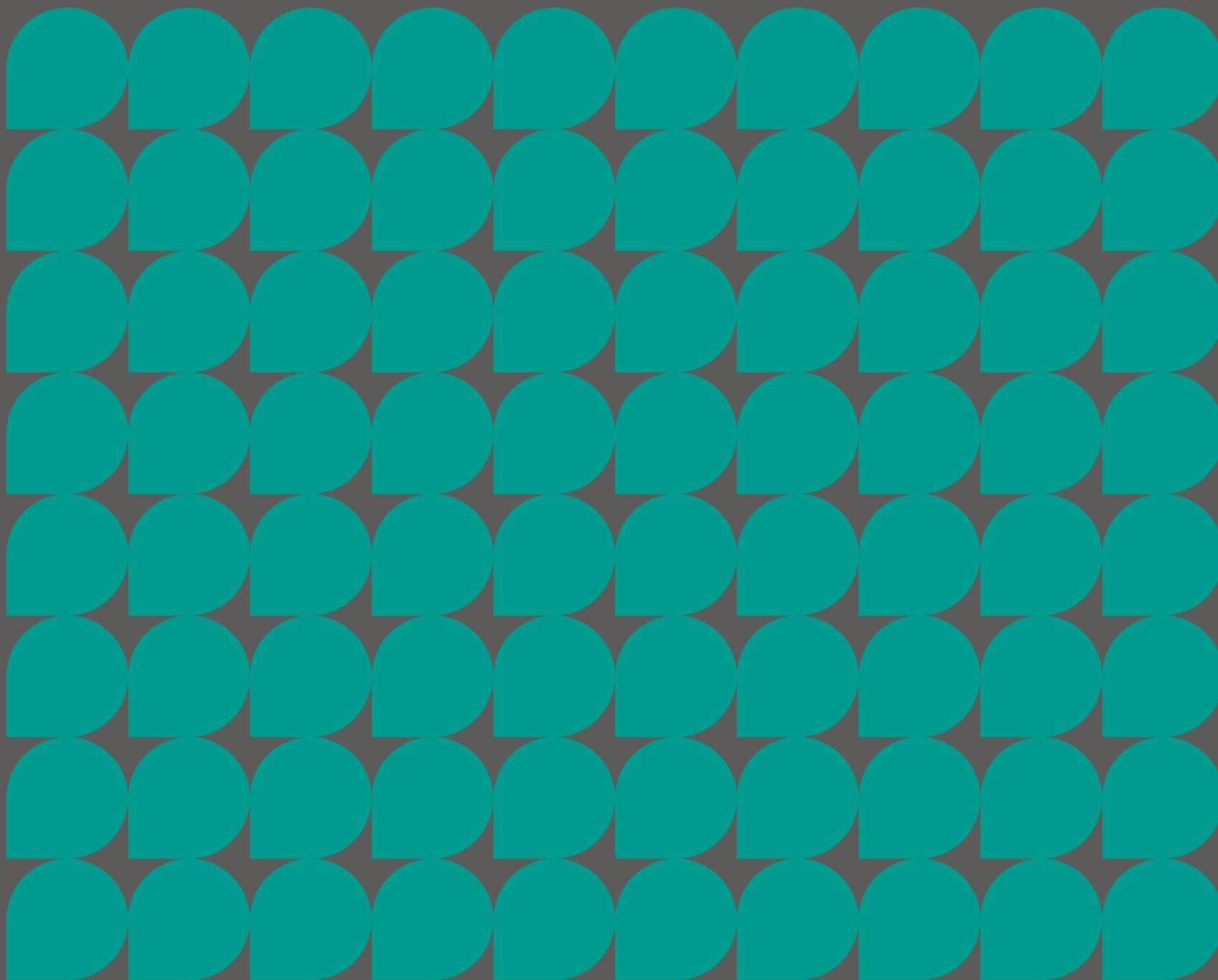


Places for Everyone

Allocations: Manchester Issues Summary

February 2022



Chapter 11 - Allocations

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 11 and the relevant respondents to PfE 2021 is set out below.

Policy GM Allocation 10: Global Logistics

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Principle/Scale of Development		
Policy JPA10.1	Policy considered to be sound	Support Noted	Stephen Kershaw Terence Kelly Adam Birds George Clancy
Policy JPA10.2	Policy considered to be unsound (no specific comments submitted)	Noted	Anne Isherwood Mary Sharkey Carol Mole Rob Shield
JPA10.3	Further expansion of the airport/air freight is contrary to the need to tackle climate change.	The allocation is intended to meet unmet employment land needs and does not deal with air travel. The impacts of additional flights is a matter for national and international policy – the UK Government published its green paper, “Aviation 2050 – the future of UK Aviation” in late 2018. The Government’s response to the consultation on the green paper is awaited.	Paul Roebuck Laura Charlotte
Policy JPA10.4	Development requirement figures have not been reviewed in light of the pandemic.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	David Brownhill
Policy JPA10.5	Huge parts of the existing airport site are underutilised (e.g., used for carparks).	The land in the airport is within the management of the Manchester Airport for their operational uses. The Airport authorities are developing a revised sustainable development plan that will consider the efficient use of land. Notwithstanding	David Brownhill

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		<p>this, there is a need to provide for additional employment opportunities in proximity to the airport with the specific case briefly set out at in section 2 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03) and the strategic case set out with respect for the need for additional industry and warehousing in the Employment Topic Paper (05.01.04).</p>	
Policy JPA10.6	<p>Proposed employment growth at the airport would be more sustainably located in town / city centres</p>	<p>The employment allocation proposed has a synergy with its location adjacent to the airport including existing development that is directly next to the allocation. The specific case is briefly set out at in section 2 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03) and the strategic case is set out with respect for the need for additional industry and warehousing in the Employment Topic Paper (05.01.04).</p>	CPRE
JPA10.7	<p>The allocation should only be used for business that genuinely depends on close proximity to the airport. To do otherwise risks placing other areas currently in the Green Belt under pressure for essential airport-linked development.</p>	<p>The allocation is designated for employment opportunities that have a synergy with the airport. The specific case is briefly set out at in section 2 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03) and the strategic case is set out with respect for the need for additional industry and warehousing in the Employment Topic Paper (05.01.04).</p>	Ringway Parish Council
JPA10.8	<p>There are many brownfield sites around the airport that could be considered for this kind of development.</p>	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper (02.01.10). The site was considered through the site selection process with details set out in the Site Selection Background Paper (03.04.01).</p>	Craig Sevant

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JPA10.9	Scale of development should not be limited as set out, and accordingly the policy soundness is in question.	The figure in the policy is expressed as “around” to indicate an approximate number considered deliverable to meet development needs. Additionally, chapters 6 and 7 clearly set minimum targets for employment and housing development. The Plan should be read as a whole. Therefore it is not considered necessary to make any change to the policy.	Manchester Airports Group The Hut Group
JPA10.10	Boundaries need amending for the proposed allocation to assist in the delivery of the site.	The boundaries drawn up for the proposed allocation reflect the necessary requirements for the site and no change is proposed.	Th Hut Group
JPA10.11	If the site is to be developed, it should be used for eco/affordable housing	The site is not suitable for residential due to its close proximity to the airport and existing large scale employment development on the adjacent site.	Vicky Harper
JPA10.12	Support for B2/B8 employment uses, to complement Davenport Green development	Support noted	Royal London Asset Management
	Green Belt		
JPA10.13	No exceptional circumstances for the loss of Green Belt have been demonstrated.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).	Ringway Parish Council Craig Sevant David Brownhill Vicky Harper
JPA10.14	The proposals should be amended to avoid/minimise the loss of Green Belt/green space/natural environment.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the	Craig Sevant

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		<p>urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).</p>	
JPA10.15	<p>This area of Green Belt is an important barrier to prevent urban sprawl from Manchester Airport.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).</p>	<p>Paul Roebuck Greater Manchester Housing Providers</p>
JPA10.16	<p>The overall quantity of Green Belt loss is excessive.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).</p>	<p>CPRE</p>
	<p>Transport</p>		

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JPA10.17	Concerned about traffic congestion/inadequate public transport provision. The infrastructure is saturated. No concessions have been made for any of the additional traffic/commuting.	The policy includes in clauses 5,6 and 7 requirements for transport mitigation that address the concerns raised. The transport analysis in the Transport Locality Assessment – Manchester (09.01.10) has considered the transport impacts of the proposed allocation and suitable mitigation has been identified in section 13 of the assessment.	Graham Winstanley Paul Roebuck National Highways Vicky Harper Graham Winstanley
JPA10.18	Five footpaths were closed to permit Application 100263/OO/2012/S2 and some diverted through this land.	Clause 5 of the policy addresses mitigation with respect to public rights of way.	Ringway Parish Council
JPA10.19	The transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements.	<p>The Transport Locality Assessment – Manchester (09.01.10) provides detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p>	National Highways

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JPA10.20	Proposals would attract industry that will necessitate large amounts of air or road travel. This cannot be sustainable in the long term and is incompatible with climate change targets.	The transport analysis in the Transport Locality Assessment - Manchester (09.01.10) has considered the transport impacts of the proposed allocation and suitable mitigation has been identified. The proposed allocation has been considered through the Integrated Appraisal – Main Report (02.01.02) and is considered to be appropriate. The IA conclusions are summarised in sections 8 and 9 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).	Paul Roebuck
	Environmental (Green Infrastructure, Biodiversity and Open Space)		
JPA10.21	There would be a loss of outdoor space and a loss of access to the countryside.	The policy sets out the need to minimise any adverse impact on national and locally designated assets of conservation, ecological and landscape value. In particular, development should avoid the Cotterill Clough SSSI, nearby SBIs and ancient woodland, and any existing landscape mitigation affected by development must be appropriately re-provided.	David Brownhill Vicky Harper
JPA10.22	<p>Concerned about the potential harm to wildlife and biodiversity. No supporting evidence has been provided for this allocation. No information about site's biodiversity assets nor its position in identified ecological networks.</p> <p>The proposal must undertake surveys of all the ecological features on and adjacent to the development. These should include surveys for bats, badgers, newts and farmland birds. Avoidance and/or mitigation and/or compensation plans must be drawn up to ensure no loss of current wildlife interest and to ensure that sustainable biodiversity net gain is built into the proposals.</p> <p>The policy should be reworded to: “Avoid any adverse impact on national and locally designated assets of conservation, ecological and landscape value and enhance these habitats with the provision of suitably managed buffer zones.”</p>	<p>The advice with respect to mitigation received from GMEU is set out at in section 18 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03)</p> <p>The policy should be read alongside other policies in the plan, in particular the policies in Chapter 8 (Greener Places) that set out the approach to landscape, green infrastructure and habitats.</p>	Vicky Harper CPRE The Wildlife Trusts
JPA10.23	The whole allocation, and particularly the SSSI, woodland, and footpaths, are mitigation for habitat and footpath destruction caused by airport expansion (planning permission 100263/OO/2012/S2)	The advice with respect to mitigation received from GMEU is set out at in section 18 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03)	Ringway Parish Council Jeremy Williams

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JPA10.24	JPA 10 is proposed to extend to the border of Sunbank Wood, a biological site of special scientific interest (SSSI). Sunbank Wood is a place of outstanding beauty and tranquillity. It is an ancient woodland, which has a unique and unspoilt character.	The advice with respect to mitigation received from GMEU is set out at in section 18 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03)	Craig Sevant David Brownhill
	Air Quality		
JPA10.25	The airport currently causes significant air pollution and noise disturbance for residents in Woodford, as well as Heald Green, Gatley and Cheadle Hulme. This would be made worse by increased number of flights.	The impacts of additional flights is a matter for national and international policy – the UK Government published its green paper, “Aviation 2050 – the future of UK Aviation” in late 2018. The Government’s response to the consultation on the green paper is awaited.	Joanne Maffia Laura Charlotte Vicky Harper
JPA10.26	The site currently provides a ‘green lung’ (role in reducing air pollution).	The policy sets out the need to minimise any adverse impact on national and locally designated assets of conservation, ecological and landscape value.	Vicky Harper
	Other Comments		
JPA10.27	The reference to high quality design and construction standards including the use of sustainable drainage systems has been removed since the previous consultation on this policy. To support wider plan policies and objectives as well as for consistency reasons, we would support additional reference to the use of Sustainable Urban Drainage (SuDS) and a wider net gain approach for this site.	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. Therefore, no change to the plan is considered as necessary.	United Utilities
JPA10.28	Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
JPA10.29	Not sustainable development	The proposed allocation has been considered through the Integrated Appraisal – Main Report (02.01.02) and is considered	Vicky Harper

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		to be appropriate. The IA conclusions are summarised in sections 8 and 9 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).	
JPA10.30	Potential flood risk, or contribution to flooding	The GM SFRA Level 1 Appendix C - Development Sites Assessments Summary Reports (04.02.13) and the accompanying spreadsheet - GM SFRA Level 1 Appendix B Sites Assessment Part 2.xlsx (04.02.12) identify that the site falls within recommendation D of the assessment which recommends that development could be permitted due to low flood risk perceived from the EA flood maps, assuming a site-specific FRA shows the site can be safe and it is demonstrated that the site is sequentially preferable.	Graham Winstanley