

Examination of Places for Everyone

Joint Development Plan Document

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IN9: Matters, Issues and Questions relating to thematic policies

This note sets out some of the Matters, Issues and Questions that will help us decide if the Plan is sound and legally compliant and, if not, how it could be modified to ensure that it is (**Annex 2**). Matters, Issues and Questions relating to other parts of the Plan are set out in separate Inspector Notes.

The GMCA should submit written statements that respond to all of our Matters, Issues and Questions on behalf of the nine local planning authorities¹.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to their original representations made under regulation 20 in response to the consultation held between August and October 2021. Representors' statements should set out the key points from their original representation against the relevant questions, and not introduce new arguments or evidence.

Written statements must be prepared in accordance with the advice in **Annex 1**.

Written statements in response to the questions in this note must be emailed to the Programme Officers in PDF format by **midday on Thursday 6 October 2022**.

No written material will be accepted after the relevant deadline for statements (unless it has been specifically requested by us).

Written statements will be published on the examination website as soon as possible after the deadline so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be

¹ All references to "the GMCA" in this document, and by us throughout the examination, should be taken to refer to the nine local planning authorities where relevant in accordance with the provisions of section 28(1) and other parts the Planning and Compulsory Purchase Act 2004 (as amended).

circulated directly to participants. Anyone who is unable to access them on the website should contact the Programme Officers.

Where relevant, our Matters, Issues and Questions refer to the GMCA's proposed main modifications and other responses to our Preliminary Questions. We will take account of the GMCA's proposed main modifications, along with all of the published evidence, representations made in accordance with regulation 20, and written statements in coming to our conclusions at the end of the examination. However, we can only recommend main modifications if we decide that they are essential to make the Plan sound or legally compliant. We cannot recommend a modification because it would "improve" the Plan, irrespective of the wishes of the GMCA or anyone else.

Any queries about this note should be taken up with the Programme Officers.

William Fieldhouse Louise Gibbons Steven Lee

21 July 2022

Written statements

All written statements must be prepared in accordance with this advice.

Any representor may submit a written statement or statements. However, these should only be in response to questions that relate to the representations that you made under regulation 20 (ie during the consultation held from 9 August to 3 October 2021). Statements should set out the key points from your representation against the relevant questions, and not introduce new arguments.

Statements should be concise and focussed, and in any event must normally contain no more than **3,000 words** for each Matter. However, we will allow statements to exceed 3,000 for Matters 6 to 12 in the following circumstances:

- If a representor made representations under regulation 20 relating to all or most questions under one of our Matters.
- Responses to individual questions do not exceed **500** words.
- The statement is succinct, focussed on our questions and avoids repetition

The GMCA should produce a statement for every Matter on behalf of the nine local planning authorities. These should also be focused and succinct. Because the GMCA has to answer every question, it may be necessary to exceed the limit of 3,000 words per Matter. In some cases, the GMCA's response to one of our Preliminary Questions may suffice as a response in which case that can be stated.

A separate statement must be submitted for each Matter that contains a question or questions that you wish to respond to. Each statement must:

- Include your name and Matter number in the top right corner of each page.
- Answer each question that you wish to respond to separately with clear reference to the relevant question number.
- Include a word count at the bottom of the final page.
- Have no appendices attached.

Where appropriate, reference should be made to relevant parts of the National Planning Policy Framework 2021 ("NPPF") (paragraph numbers) and associated Planning Practice Guidance ("PPG") (eg ID:61-002-20190315) with an explanation of why you think the policy in question is consistent or inconsistent with it. Reference should also be made to specific parts of evidence in the examination library, including the GMCA submission and supporting documents and any documents submitted by representors with their regulation 20 representations. The document reference, title, page and paragraph number should be stated.

There is no need to quote extensive parts of the NPPF, PPG or evidence documents, although a brief extract or summary of key factual information from evidence in the examination library may be included if it is directly relevant to one of our questions.

Written statements are not the opportunity to introduce new evidence. If the GMCA or any representor considers that there is evidence that it is essential to refer to in order to answer one of our questions, but which is not in the examination library, please check with the Programme Officers before submitting it. If, exceptionally, we agree to accept additional evidence, for example because it has only become available since the Plan was submitted and it is essential for us to consider, it would be added to the examination library.

If your response to any of our questions concludes that the relevant part of the Plan is not sound, your statement should set out how you think it should be modified to ensure that it is. Where relevant, refer to any proposed modifications or changes to the Policies Map that have been proposed by the GMCA.

End of IN9 Annex 1

Matters, Issues and Questions relating to thematic policies

Local plans must set out the local planning authority's policies (however expressed) relating to the development and use of land in their area². Policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the NPPF). Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and be limited to those necessary to address the strategic priorities of the area (and any relevant cross boundary issues) to provide a clear starting point for any non-strategic policies that are needed³.

Policies JP-Strat12 to JP-Strat14 relate to main town centres; strategic green infrastructure; and the transport network. Those matters are also addressed by policies in chapters 8, 9 and 10 of the Plan which contain thematic policies relating to energy, resources and climate change; the economy; housing; natural environment, landscape and greenspaces; design, heritage, health and community facilities; and transport and digital infrastructure. Chapter 12 contains two policies related to delivering the Plan.

The GMCA response to PQ71 advises that the intended purpose of policies JP-Strat12 to JP-Strat14 is to provide a strategic justification for thematic policies in chapters 8, 9 and 10 of the Plan; provide a strategic framework for local plans (but not set out specific requirements to be taken forward in local plans); and set out clearly written unambiguous policies to inform the preparation and determination of planning applications. Policy JP-Strat14 is also intended to provide an expression of the rationale which underpins the Greater Manchester Transport Strategy 2040 which guides transport investment and infrastructure decisions.

The GMCA response to PQ72 advises that the intended purpose of the policies in chapters 5 to 10 and 12 of the Plan is to provide a strategic framework for local plans and set out clearly written unambiguous policies to inform the preparation and determination of planning applications. Some policies also set specific requirements to be taken forward in local plans. Policies JP-C1 to JP-C7 also support and facilitate the delivery of the Greater Manchester Transport Strategy 2040.

The GMCA response to PQ73 advises that the vast majority of the parts of the thematic policies in chapters 5 to 10 of the Plan relate to the development and use of land, and are intended to be implemented through the preparation of local plans, supplementary planning documents, and/or development management decisions. A limited number of parts are not directly related to the development and use of land and/or are intended to be implemented by other means.

² Section 17(3) of the 2004 Act.

³ NPPF 16, 20 and 21.

Various policies in the Plan refer to documents (that are not development plan documents), some existing and some to be produced. The GMCA response to PQ74 identifies all such instances and proposes modifications to a number of policies aimed at ensuring that the references are necessary and appropriate in terms of the weight they are to be given in making planning decisions.

We consider whether the approach described above is sound in relation to each thematic policy under subsequent matters and issues.

Matter 6 Sustainable and Resilient Places

This chapter contains seven policies relating to sustainable development, energy, resilience, flooding and drainage, air quality and resource efficiency.

Policy JP-S1 – Sustainable Development

The second paragraph of policy JP-S1 states that preference will be given to using previously developed (brownfield) land and vacant buildings to meet development needs.

Q6.1. a) Is the preference for previously developed land and vacant buildings justified and consistent with national policy? b) Is the policy effective in terms of how the preference for previously developed land and vacant buildings should be considered in determining planning applications or in the preparation of local plans?

Policy JP-S2 Carbon and Energy

This policy establishes an aim of delivering a carbon neutral Greater Manchester no later than 2038.

Q6.2. a) Is the aim of delivering a carbon neutral Greater Manchester no later than 2038 justified and consistent with national policy b) Is there any substantive evidence that the requirements of policy JP-S2 would render development unviable?

Q6.3. Is criterion 4 of policy JP-S2 justified and consistent with national policy, particularly NPPF 209-217 on facilitating the sustainable use of minerals? b) Are issues of mineral extraction within the scope of the Plan and would the criterion form an effective basis for determining planning applications and/or preparing district local plans?

The GMCA response to PQ75 states that the purpose of criterion 5 is to provide a broad framework to apply a policy approach across Greater Manchester for a balanced and smart electricity grid. It is anticipated that district local plans will identify locations for such energy assets as considered necessary or appropriate.

The GMCA response to PQ76 states the purpose of criterion 7 is to provide a broad framework to apply a policy-based approach across Greater Manchester for the development of Local Energy Plans to develop cost-effective pathways to achieve carbon targets in line with Government policy. The response proposes a modification to the reasoned justification to include background information on Local Area Energy Plans, their purpose in being part of the evidence base for district local plans and how they will be expected to use them in local plan preparation.

Q6.4. Are criteria 5 and 7 of policy JP-S2 effective in providing a strategic framework for local plans? In particular:

- a) Is criterion 5 clear about how, and on what basis, individual authorities would be expected to identify locations for energy assets?
- b) Is criterion 7 clear about how Local Area Energy Plans are to be used in the preparation of district local plans or what local plans should include?
- c) Are the proposed modifications to reasoned justification set out in the GMCA response to PQ76 necessary for soundness?

Q6.5. Is criterion 6 of policy JP-S2 justified and effective? In particular, how is the objective of increasing the range of nature-based solutions, including carbon sequestration through restoration of peat-based habitats, woodland management, tree planting and natural flood management techniques intended to be taken into account in the determination of planning applications and/or the preparation of local plans?

Under amendments to the Building Regulations laid before Parliament on 15 December 2021, the Government has introduced new requirements for installing electric vehicle charge points in new homes, new non-residential buildings, and when some buildings are renovated, as well as requirements in relation to overheating in new residential dwellings, ventilation for dwellings and other buildings, and energy performance for new and existing buildings.

The GMCA response to PQ17 suggested a main modification to criterion 8a of policy JP-S2 which would delete the reference to Part L of the 2013 Building Regulations and footnote 32. In relation to electric vehicle (EV) charging points, the GMCA response also suggested a modification to paragraph 5.19 to add new text relating to the siting of EV charging points and their effect on the street scene, amenity and access.

Q6.6. Are the requirements of criterion 8 justified, consistent with national policy and effective? In particular:

- The expectation that development will be net zero carbon from 2028;
- The incorporation of 'adequate' EV charging points, having particular regard to the requirements of Building Regulations;
- Connections to renewable energy/heating/cooling networks; and
- Achieving energy demand reductions.

Q6.7. Are the suggested modifications to delete the reference to Part L of the 2013 Building Regulations in criterion 8a and footnote 32 from policy JP-S2 necessary for soundness?

Q6.8. Is the suggested modification to paragraph 5.19 necessary for soundness? In particular, how does the suggested additional text help to explain what would constitute 'adequate electric vehicle charging points' in criterion 8b?

Policy JP-S3 Heat and Energy Networks

The GMCA response to PQ77 advises that the purpose of criterion 1 of policy JP-S3 is to set a strategic approach and policy framework in relation to development opportunities for heat and energy networks. The response also advises that Figure 5.1 identifies the broad Heat and Energy Opportunity Areas across the nine districts and these will be further refined by districts when more local evidence becomes available.

The response also proposes modifications to criterion 1 of the policy and associated reasoned justification which seeks to clarify the meaning and role of Heat Energy Network Opportunity Areas.

Q6.9. a) Is criterion 1 of policy JP-S3 justified, consistent with national policy and effective? In particular:
a) Have the Heat and Energy Opportunity Areas identified on Figure 5.1 been identified on a robust basis?
b) Is it sufficiently clear to decision makers, developers and local communities what the geographical extent of the Heat and Energy Opportunity Areas are?
c) Is it sufficiently clear in what circumstances district local plans would be expected to identify new Heat and Energy Opportunity Areas or amend those in the Plan?
d) Are the proposed modifications to criterion 1 and paragraphs 5.20 and 5.22 necessary for soundness?

Criterion 2 of policy JP-S3 sets out the requirements for development which takes place within identified 'Heat and Energy Network Opportunity Areas'.

Q6.10. Are the detailed development requirements set out criterion 2a-f justified, consistent with national policy and effective? In particular:
a) In criterion 2a, the requirement for all new developments of 10 dwellings or more or over 1000 sqm floorspace to evaluate the viability of connecting to an existing or planned heat/energy network or installing a site wide or communal heat/energy network solution.
b) In criterion 2b, requiring development which is unviable for connection under criterion 2a. to incorporate capability to enable future connection.

- d) In criterion 2c, the reference to a ‘presumption in favour of network connection’ and how it relates to NPPF 11 (as indicated in footnote 41)? How would this ‘presumption’ apply to the determination of development proposals?
- e) In criterion 2d, expecting all new industrial development to demonstrate that opportunities for using waste heat locally have been fully examined and included in proposals unless proven not to be viable.
- f) In criterion 2e, the expectation that where publicly owned buildings and assets adjoin development sites, opportunities for these buildings and assets to connect to site-wide proposals will be considered.

Criterion 3 of policy JP-S3 sets out the requirements for heat/energy network viability assessments. National guidance⁴ states that a local planning authority may request supporting information with a planning application but that its requirements should be specified on a formally adopted ‘local list’ which has been published on its website less than 2 years before an application is submitted. Local information requirements have no bearing on whether a planning application is valid unless they are set out on such a list.

Q6.11. Criteria 3a-g appear to refer to the content of evidence documents that would be submitted to support a planning application. Is it necessary, justified or effective to contain this type of information in policy?

Policy JP-S4 – Resilience

Policy JP-S4 sets out 13 ‘key measures’ for managing development to increase the capacity of its citizens, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges.

Q6.12. Are all criteria in policy JP-S4 justified, consistent with national policy and effective? In particular, are each of the criteria clear and unambiguous so that it is evident how a decision maker should react to development proposals and/or how they would be used in the preparation of district local plans?

Policy JP-S5 Flood Risk and Water Environment

Criterion 1 of policy JP-S5 refers to returning rivers to a more natural state, where practical, in line with the North West River Basin Management Plan (BMP). The GMCA response to PQ78 advises that the BMP is the overarching evidence base for information on the water environment, that there is a statutory obligation for all public bodies to have regard to them and it should be taken into consideration in relevant planning applications.

⁴ PPG ID:14-039

Q6.13. Is reference in criterion 1 to development being ‘in line’ with the BMP justified and consistent with national policy?

Criterion 7 of policy JP-S5 refers to securing further investment in wastewater treatment to reduce the frequency of intermittent discharge of storm sewerage.

Q6.14. Is criterion 7 justified, consistent with national policy and effective? In particular, who is intended to secure, or provide, further investment in wastewater treatment and is the criterion intended to look beyond the direct mitigation of the effects of development?

Criterion 8 of policy JP-S5 refers to conserving water and maximising water efficiency in new development. National guidance⁵ states that where there is a clear local need, local planning authorities can set out local plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

Q6.15. How does the reference to ‘maximising water efficiency in new development’ relate to national guidance outlined above? Is the criterion clear and unambiguous so that it is clear how decision makers should react to development proposals?

The GMCA response to PQ78 proposes a modification to the first sentence of the policy to make it clear that the “integrated catchment-based approach” will be delivered through development management.

Q6.16. Is the proposed modification to the first sentence policy JP-S5 necessary for soundness?

Policy JP-S6 Clean Air

Criterion 6 of policy JP-S6 refers to implementing the charging Clean Air Zone within the Plan area, as directed by Government and associated measures. The GMCA response to PQ79 proposes a number of modifications to the policy and reasoned justification, including deleting the reference to Clean Air Zone in criterion 6, replacing it with reference to a Clean Air Plan and deleting information about the Clean Air Zone in paragraphs 5.48 and 5.49.

Q6.17. What, if any, effect will the review of the Clean Air Plan have on the spatial strategy or scale of development proposed in the Plan?

Q6.18. Are the proposed modifications to criterion 6, paragraphs 5.48 and 5.49 and paragraph 10.14 necessary for soundness?

⁵ PPG ID: 56-014

Q6.19. Is policy JP-S6 justified, consistent with national policy and effective? In particular:

- In criterion 2, expecting development to be in accordance with guidance published jointly by the Institute of Air Quality Management (IAQM) and/or Environmental Protection UK;
- In criterion 3, requiring appropriate provision for future monitoring of air pollution;
- In criterion 4, restricting and regulating developments that would generate significant source point pollution. Is this consistent with NPPF 188?
- In criterion 5, significantly expanding the network of electric vehicle charging points, having regard to changes to Building Regulations and policy JP-S2;

Policy JP-S7 Resource Efficiency

The GMCA response to PQ80 confirms that the Zero Waste Strategy and Resource Strategy referred to in paragraph 5.54 and the policy respectively are the same document. A modification is proposed to the policy to correct this.

Q6.20. Is policy JP-S7 justified, consistent with national policy and effective? In particular:

- The relationship between the Plan and the Greater Manchester Joint Waste Development Plan adopted in 2012 and referred to in paragraph 5.56?
- The role and status of the Zero Waste Strategy and how this will be used in the determination of planning applications and/or the preparation of district local plans?
- In criterion 2, ensuring design of new development incorporates storage space and processing of waste on site.

Matter 7 Places for Jobs

This chapter contains four policies which establish the overall strategy and approach to economic development, set out the office, industrial and warehousing requirements for the whole of Greater Manchester and detailed matters relating to the protection of employment land and what would be expected from new employment related development.

We considered under Matter 2 whether the minimum overall office requirement of 1.9m sqm of office floorspace and 3.33m sqm of industry and warehousing is justified and consistent with national policy. We also consider some aspects of policies JP-J1-J4 under Matter 3 in relation to the spatial strategy. This issue is therefore concerned with other aspects of policies JP-J1-J4.

Policies JP-J1 – JPJ4

Q7.1. Are policies JP-J1 to JP-J4 justified, consistent with national policy and effective? In particular:

- a) Do the locations identified in JP-J1 part G and parts 1-4 of policy JP-J3 fully reflect and help deliver the strategy set out in policies JP-Strat1 – JP-Strat12?
- b) Is the final paragraph of policy JP-J3 justified and consistent with national policy, in particular NPPF 82d which requires planning policies to be flexible to accommodate unanticipated needs, allow new and flexible working practices and enable rapid response to changing circumstances?
- c) Are criteria A - C of policy JP-J4 justified and effective in expecting developments of more than 100,000 sqm to provide opportunities for manufacturing businesses, units capable of accommodating small and medium enterprises and overnight parking for heavy goods vehicles?

The second paragraph of JP-J2 refers to the selective removal of land from the Green Belt. The GMCA response to PQ37 proposes a modification to policy JP-J2 which would add text to the policy making it clear that reference to the 'selective release' of Green Belt refers only to allocations in the Plan.

The final sentence of the second paragraph refers to increasing the delivery of previously developed sites for employment use and hence minimise the need for any further Green Belt release.

Q7.2. a) Is the suggested modification to policy JP-J2 to include reference to chapter 11 necessary for soundness? b) Does reference to 'minimising the need for any further Green Belt release' mean the policy is proposing that district local plans could remove land from the Green Belt to provide additional floorspace to that identified in Table 6.2?

Matter 8 Places for Homes

Chapter 7 contains four policies relating to the scale, distribution and phasing of housing development; the affordability of new housing; the type, size and design of new housing; and the density of new housing.

Issue 8.1 Is the approach in policy JP-H1 to delivery rates, phasing and five year supply positively prepared, justified and consistent with national policy?

We considered under matter 2 whether the minimum housing requirement figure of 164,880 net additional dwellings (2021 to 2037) is justified and consistent with national policy. And we considered under matter 3 whether the proposed distribution of housing development between the nine districts (2021 to 2037) set out in Table 7.2 represents an appropriate spatial strategy, having regard to reasonable alternatives. This issue is concerned with other aspects of policy JP-H1, including the proposed phasing of housing development and the approach to demonstrating a five year supply of deliverable sites.

“Delivery Rates”

The GMCA responses to PQ25 and PQ28 propose modifications to policy JP-H1 and paragraph 7.20 to make clear that the “delivery rates” in Table 7.2 are the minimum number of net additional dwellings each district is expected to identify a sufficient supply of sites for in their local plans as required by national policy.

JP-H1 states that each local planning authority will monitor delivery rates within their area and take action, including development management action, as necessary to ensure that delivery rates are maintained as anticipated.

The GMCA response to PQ82 advises that the types of action that Council’s may take include seeking loans or Government funding to make development viable; building homes themselves or in joint ventures with the private sector; and improving development management performance.

Q8.1. Are the modifications to policy JP-H1 and paragraph 7.20 (to clarify that the “delivery rates” in Table 7.2 are the minimum number of net additional dwellings each district is expected to identify a sufficient supply of sites for in their local plans) necessary to make the Plan sound? If so, would they be effective in that regard?

Housing land supply

Policy JP-H1 states that Table 7.1 “defines the land supply”. Table 7.1 summarises housing land supply in each district from strategic housing land availability assessments, allowances (small site windfalls, combined in 4 districts with demolitions), and allocations in the Plan. Table 7.1 identifies a total supply from those sources of 190,752 dwellings in the Plan area for the period 2021-2037. Table 7.1 indicates that 20,367 dwellings will be provided on the allocations proposed in the Plan. The other sources of supply identified in Table 7.1 do not seem to be proposals in the Plan, and are not identified on the Policies Map.

The GMCA response to PQ27 proposes a main modification to delete reference to Table 7.1 in policy JP-H1 as the housing supply figures summarised in that table form part of the reasoned justification rather than policy.

Q8.2. Is the proposed modification to delete reference to Table 7.1 from policy JP-H1 necessary to make the Plan sound? If so, would it be effective in that regard?

Phasing of housing development

National guidance advises that a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period⁶.

⁶ PPG ID:68-021.

Policy JP-H1 sets out a phased approach to housing development with annual rates in the Plan area as a whole rising from 8,732 in 2021-25 to 10,305 in 2025-30 and 11,204 in 2030-37. All districts, apart from Manchester and Salford, have rates that increase between those different periods.

Paragraphs 7.16-7.19 refer to the need for a realistic trajectory; uncertainties associated with the pandemic; challenges associated with urban brownfield sites in the early years of the Plan; the need to develop new markets for housing; and the need for masterplanning and infrastructure investments for some sites, including many of the allocations in the Plan. The GMCA response to PQ81 refers, in addition to the above, to significant increases in the level of housing requirement compared to existing policies in Bolton, Oldham, Rochdale, Tameside and Trafford. The response also clarifies that the phased approach does not preclude delivery above the minimum rates in any parts of the plan period.

Q8.3. Is the proposed phasing of development in the Plan area as a whole and in each district (other than Manchester and Salford) as set out in Table 7.2 justified and consistent with national policy? In particular:

- a) are the housing requirement figures for each of the seven districts that have a stepped trajectory significantly higher than in previous policies; and/or
- b) are there strategic sites that are likely to be delivered later in the Plan period that justify the phased approach?

Five year housing requirement and supply in each of the nine districts

The GMCA response to PQ30 proposes a modification to add a sentence to policy JP-H1 to make clear that each local planning authority will be required to identify and update annually a supply of specific deliverable sites in their district to provide a minimum of five years' worth of housing against the minimum delivery rates for the district set out in Table 7.2, irrespective of any shortfalls or surpluses in other districts and in the Plan area overall.

Q8.4. Is the proposed modification to policy JP-H1 (relating to the requirement for each local planning authority to demonstrate a minimum of five years' worth of housing against the minimum delivery rates for the district set out in Table 7.2) necessary to make the Plan sound? If so, is it effective in that regard?

Taking account of under or over supply since the start of the Plan period

JP-H1 states that any shortfall or surplus (in delivery, compared to the rates set out in Table 7.2) should be distributed over the remainder of the full plan period when calculating five year supply.

National guidance states that any shortfall should be added to the plan requirements for the next five year period, then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process⁷.

⁷ PPG ID:68-031.

Paragraph 7.19 suggests that distributing any shortfall or surplus over the remainder of the plan period is due to uncertainties with the trajectory set out in Table 7.2, and to avoid local planning authorities being adversely affected when it comes to calculating their five year housing land supply. The GMCA response to PQ83 refers to reducing the risk of unplanned speculative sites and homes being built ahead of necessary infrastructure. The stepped trajectory and approach to any shortfall or surplus is intended to ensure a plan-led approach.

Q8.5. Has an adequate case been made to justify the approach in policy JP-H1 to distributing any shortfall in delivery over the remainder of the Plan period?

Issue 8.2 Does policy JP-H2 set out a justified and effective approach to the provision of affordable homes?

Policy JP-H2 aims to deliver “our share of 50,000 affordable homes across Greater Manchester with at least 60% being for social rent or affordable rent”.

The Greater Manchester Strategic Housing Market Assessment⁸ identifies a net annual affordable housing requirement of 5,850 in Greater Manchester. The figure for Stockport is 636, meaning that the annual requirement for the nine authorities covered by the Plan seems to be 5,214.

The GMCA response to PQ84 advises that the reference to 50,000 affordable homes in policy JP-H2 is to a Greater Manchester ambition and is intended to act as a guide for districts. The Plan does not set affordable housing requirements, other than in relation to some allocations, as that will be done in local plans.

Q8.6. Are the references in policy JP-H2 to 50,000 affordable homes and 60% being for social rent or affordable rent justified? Will policy JP-H2 provide an effective strategic framework for local plans and an unambiguous approach to inform the preparation and determination of planning applications?

Issue 8.3 Are the requirements in policy JP-H3 relating to the type, size and design of new housing justified?

Mix of dwelling types and sizes

Policy JP-H3 states that the precise mix of dwelling types and sizes will be determined through local plans, masterplans and other guidance. The GMCA response to PQ74 proposes a modification to so that it states that the precise mix of dwelling types and sizes will be determined through local plans, and have regard to masterplans and other guidance.

Table 7.3 indicates the proportion of new homes that are expected to be provided as houses and apartments in each district and overall in the Plan area between 2020 and 2037. The GMCA response to PQ85 advises that Table 7.3 demonstrates that

⁸ 06.01.02.

the land supply identified in the Plan responds to the forecast need for apartments and houses.

Q8.7. Is the requirement in policy JP-H3 for local plans, masterplans and other guidance to determine the precise mix of dwelling types and sizes justified? If not, would the GMCA proposed modification make it sound? Does Table 7.3 provide reasoned justification for that requirement, or for other policies in the Plan?

Accessible and adaptable homes

Policy JP-H3 requires all dwellings to be built to the accessible and adaptable standard in part M4(2) of the building regulations unless specific site conditions make this impracticable.

National policy states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties. Planning policies for accessible housing should be based on evidence of need, viability and a consideration of site specific factors such as vulnerability to flooding, site topography and other circumstances which may make a specific site less suitable for M4(2) compliant dwellings particularly where step free access cannot be achieved or is not viable⁹.

The GMCA response to PQ86 refers to a Housing Technical Standards Report (June 2022)¹⁰ which collates evidence from a number of sources relating to the need for accessible and adaptable homes. This includes:

- higher levels of disability, and lower healthy and disability-free life expectancy, in the Plan area compared to regional and national averages;
- an ageing population in the Plan area; and
- over half of new homes expected to be apartments, which are more difficult to adapt and make accessible at a later stage.

The GMCA response to PQ86 also refers to viability evidence¹¹ which assumed an additional cost of £1,500 per home to meet the standard. GMCA consider that to be a conservative assumption as some such additional costs are now likely to be reflected in general build costs prepared by BCIS.

Q8.8. Is the requirement in policy JP-H3 for all dwellings to be built to the accessible and adaptable standard in part M4(2) of the building regulations (unless specific site conditions make this impracticable) justified taking account of need and viability?

Internal space standards

Policy JP-H3 requires all dwellings to comply with nationally described space standards.

⁹ NPPF 130(f) footnote 49 and PPG ID:63-009 and PPG ID:56-008.

¹⁰ GMCA 5.2.

¹¹ 03.01.01 and 03.01.04.

National policy states that planning policies for housing may make use of the nationally described space standard where the need for an internal space standard is justified taking account of need, viability and timing¹².

The GMCA response to PQ87 refers to a Housing Technical Standards Report (June 2022)¹³ which collates evidence from a number of sources relating to the need for internal space standards. This includes:

- 45% of new homes recently built in the Plan area failing to meet the standards (63% of houses and 27% of apartments); and
- average sizes of new homes in the Plan area being smaller than the national averages.

The GMCA response to PQ87 also refers to viability evidence¹⁴ which assumed unit sizes consistent with the nationally described space standards. Whilst the evidence shows that some types of residential development, including on some allocations in the Plan, would not be viable without public subsidy, GMCA state that it would not be appropriate to exempt such development from the requirement particularly as this would include more deprived areas.

The GMCA response to PQ87 advises that the requirement to meet the nationally described space standards has been included in various drafts of the Plan since 2016 and therefore it is not necessary to include any transitional arrangements.

Q8.9. Is the requirement in policy JP-H3 for all dwellings to comply with nationally described space standards justified taking account of need, viability and timing?

Issue 8.4 Are the minimum net residential densities set out in policy JP-H4 justified and consistent with national policy, and will they be effective in making optimal use of sites and achieving well designed places?

Policy JP-H4 states that new housing development should be delivered at a density appropriate to the location, reflecting the accessibility of the site by walking, cycling and public transport, in accordance with specified minimum net residential densities for different types of location ranging from 35 dwellings per hectare to 200 dwellings per hectare. Paragraph 7.34 refers to higher densities making efficient use of land, minimising loss of Green Belt, reducing the need to travel by car, and increasing population close to services and facilities.

NPPF 124 sets out factors that should be taken into account when setting policies to achieve efficient use of land. NPPF 125 refers to making optimal use of sites including through setting minimum density standards that seek a significant uplift in the average density of residential development in city and town centres and other locations well served by public transport unless there are strong reasons why this would not be appropriate.

¹² NPPF 130(f) footnote 49 and PPG ID:56-020.

¹³ GMCA 5.2.

¹⁴ 03.01.01 and 03.01.04.

The GMCA response to PQ88 advises that the specified minimum densities were developed using district knowledge of land supply, past delivery, and the existing character of areas. They are considered to be realistic and reflective of the Plan's ambitions to use land as efficiently as possible.

Q8.10. Are the minimum net residential densities set out in policy JP-H4 justified and consistent with national policy, and will they be effective in making optimal use of sites and achieving well designed places?

Issue 8.5 Is the approach of addressing the accommodation needs of different groups in the community, in particular those relating to travellers, through local plans (rather than in the Plan) justified and consistent with national policy?

NPPF 62 states that the size, type and tenure of different groups in the community should be assessed and reflected in planning policies. This includes meeting the needs of travellers (Gypsies, Travellers and Travelling Showpeople). Detailed national policy is set out in Planning Policy for Traveller Sites (2015).

The GMCA response to SPQ27, SPQ28 and FPQ28 advises that the needs of different groups will be addressed through district local plans in the timescales set out in the Local Development Schemes.

Q8.11. Is deferring the assessment of needs for different groups in the community, in particular those relating to Gypsies, Travellers and Travelling Showpeople, justified and consistent with NPPF 62?

Matter 9 Greener Places

This matter is concerned with the Habitats Regulation Assessment, policy JP-Strat 13 and the thematic policies in Chapter 8 of the plan relating to landscape, the green infrastructure network, biodiversity and the Green Belt.

Issue 9.1 Habitats Regulation Assessment

The GMCA carried out a Habitat Regulations Assessment (HRA) during the preparation of the Plan and published a report in February 2022¹⁵.

The GMCA response to PQ13 advises that Natural England has outstanding concerns about the HRA relating to the impacts of recreational disturbance and air quality on sites within the national site network, including how these will be mitigated, and how the mitigation will be secured.

The GMCA response to FPQ13 indicates that the following work is being carried out to address Natural England's concerns:

¹⁵ SD20

- Preparation of a Suitable Alternative Natural Greenspace and Strategic Access Management and Monitoring Strategy to mitigate recreation disturbance impacts on the South Pennines Moor Special Area of Conservation (including South Pennines Moor Phase 2 Special Protection Area and Peak District Moors Special Protection Area).
- Further assessment to find out if blanket bogs, transition mires and quaking bogs are present in the relevant parts of the South Pennines Moor Special Area of Conservation (including South Pennines Moor Phase 2 Special Protection Area and Peak District Moors Special Protection Area) along with the preparation of an air pollution mitigation strategy.
- Preparation of an air pollution mitigation strategy for the Rochdale Canal Special Area of Conservation.
- Completion of an air quality modelling study of new tree belts at Holcroft Moss Special Area of Conservation and the preparation of a mitigation strategy.

Each of the above pieces of work is expected to be completed in September 2022 (with draft reports available in July/August). GMCA anticipate that a statement of common ground will be agreed with Natural England following completion of the work in September 2022.

The GMCA response to FPQ13 advises that concerns about the HRA were also raised in representations by Save Greater Manchester's Green Belt Group in 2021 at regulation 19 stage, and that those concerns were addressed in the updated HRA published in February 2022 and/or will be by the ongoing work referred to above.

Q9.1. Subject to the satisfactory completion of the additional work currently being carried out, will the Habitats Regulations Assessment comply with the Conservation of Habitats and Species Regulations 2017?

We are likely to publish a supplementary question or questions relating to this issue in due course. This may be when the draft reports relating to the further work have been published (in July or August) and / or when the final reports and statement of common ground with Natural England have been published (in September).

Issue 9.2 Are policies JP-G1 to JP-G9 justified, effective and consistent with national policy?

The GMCA response to PQ72 and PQ73 advises that the policy JP-Strat 13 and thematic policies in Chapter 8 provide a strategic framework for local plans and informing the preparation and determination of planning applications.

Policy JP-G1 Landscape

NPPF 174 states that planning policies and decisions should contribute to enhance the natural and local environment by protecting and enhancing valued landscape amongst other things. NPPF 175 amongst other things indicates that plans should plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

The second paragraph of policy JP-G1 refers to 'transitional areas around new development and the interface of new development with the surrounding countryside/landscape'. The GMCA response to PQ90 advises that 'interface' and 'transitional' areas are 'one and the same' and proposes a modification to this effect.

Q9.2. Is policy JP-G1 justified, consistent with national policy and effective? In particular:

- a) Paragraph 1 - the list of special qualities and sensitivities of the key landscape characteristics?
- b) Paragraph 2 - Taking opportunities to improve the intactness and condition of the landscape, and how will this work in practice in conjunction with JP-G9?
- c) Paragraph 3 - The role and status of the Greater Manchester Landscape Character and Sensitivity Assessment and how this will be used in the determination of planning applications and/or the preparation of district local plans?

Q9.3. Is the proposed modification to policy JP-G1 relating to the interface of new development necessary to make the Plan sound? If so, is it effective in that regard?

Policies JP-Strat13 and JP-G2 Strategic Green Infrastructure and the Green Infrastructure Network

The GMCA response to PQ71 and PQ72 advises that JP-Strat13 and the thematic policies in Chapter 8 provide a strategic framework for local plans and informing the preparation and determination of planning applications.

NPPF 174, NPPF 175, NPPF 179 amongst other things refer to the role of plans in contributing to and enhancing the natural and local environment, a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and in protecting and enhancing biodiversity.

Policy JP-G2 lists 13 Green Infrastructure Opportunity Areas which are identified as having potential to delivering improvements to the Green Infrastructure Network. The GMCA response to PQ91 advises that the Green Infrastructure Opportunity Areas listed in Policy JP-G2, and Figure 8.3 are a consolidated list of district opportunities set out in Figure 2 and Table 3 of the Natural Environment Topic Paper¹⁶.

Q9.4. Are policies JP-Strat13 and JP-G2 justified, effective and consistent with national policy? In particular:

- a) The strategic green infrastructure assets to be protected and enhanced (JP-Strat13).
- b) The role and status of the Nature Recovery Network and how this will be used in the determination of planning applications and/or the preparation of district local plans? (JP-G2).
- c) The role and status of Green Infrastructure Opportunity Areas and how this will be used in the determination of planning applications and/or the preparation of district local plans? (Paragraphs 3 and 4 of JP-G2).

¹⁶ 07.01.26

d) The requirements of paragraph 5 for new development (JP-G2)

Policies JP-G3 to JP-G5 River Valleys and Waterways, Lowland Wetlands and Mosslands, Uplands

Policies JP-G3, JP-G4 and JP-G5 refer to planning decisions and 'other associated activities' in relation to seek to deliver the policies. The GMCA response to PQ89 advises that there is an expectation that partners referred to in chapter 8 will take these policies into account when developing initiatives.

Q9.5. Are Policies JP-G3 to JP-G5 justified, effective and consistent with national policy? In particular:

- a) Are policies JP-G3 to JP-G5 clearly written such that they will provide an effective strategic framework to inform the preparation of local plans?
- b) Are policies JP-G3 to JP-G5 clearly written such that they will provide an effective strategic framework to inform the preparation and determination of planning applications?
- c) The requirements in the policies relating to 'other associated activities' (JP-G3, JP-G4 and JP-G5)
- d) The requirements in the policies relating to recreation and health and wellbeing (JP-G3 (Criteria 2 and 8), JP-G4 (Criteria 6), JP-G5 (Criteria 6))

Policy JP-G6 Urban green space

The second bullet in policy JP-G6 refers to accessibility standards. The GMCA response to PQ92 advises that the standards relate to the commitment by the Government's 25 Year Environment Plan to develop a national framework of green infrastructure standards, and also that the Greater Manchester districts should set locally applicable standards.

Q9.6. Is Policy JP-G6 justified, effective and consistent with national policy? In particular:

- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
- b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?
- c) The requirements of the policy relating to accessibility standards (second bullet)

Policy JP-G7 Trees and Woodland

The Greater Manchester Tree and Woodland Strategy is referred to in policy JP-G7 and at paragraph 8.44 of the supporting text. This is being prepared and it is intended that it is formally adopted as guidance. The GMCA response to PQ93 advises the Strategy has now been prepared and proposes a modification to this effect.

Q9.7. Is Policy JP-G7 justified, effective and consistent with national policy? In particular:

- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
- b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?
- c) The requirements of the policy relating to tree planting (Criterion 3), the new City Forest Park (Criterion 5)

Q9.8. Is the proposed modification to policy JP-G7 relating the Greater Manchester Tree and Woodland Strategy necessary to make the Plan sound? If so, is it effective in that regard?

Policy JP-G8 Standards for greener places

The second bullet point in policy JP-G8 refers to applying a 'Green Factor', which is intended to set out the level of on-site GI that developments are expected to provide. There is no supporting text to indicate its status or whether it is in place. The GMCA response to PQ94 indicates that the 'Green Factor' has yet to be developed.

- Q9.9 Is Policy JP-G8 justified, effective and consistent with national policy? In particular:
- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
 - b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?
 - c) The requirements of the policy relating to the 'Green Factor', including any implications for viability of new development.

Policy JP-G9 Biodiversity and Geodiversity

NPPF 179 amongst other things refer to the role of plans in protecting and enhancing biodiversity and sets out several criteria.

The GMCA response to PQ74 advises that references to legislation, government guidance and policy are not necessary and proposes modifications to that effect.

- Q9.10. Is Policy JP-G9 justified, effective and consistent with national policy? In particular:
- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
 - b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications, with particular regard to a mitigation hierarchy (second paragraph bullet a) and biodiversity net gain?

Q9.11. Are the proposed modifications to policy JP-G9 relating to legislation, government guidance and policy necessary to make the Plan sound? If so, is it effective in that regard?

Issue 9.3 Are Policies JP-G10 and JP-G11 justified, effective and consistent with national policy?

This issue is concerned with the thematic policies in Chapter 8 which deal with the Green Belt. Strategic matters relating to the Green Belt are covered in IN8 (Matter 4). We will consider site specific issues related to each allocation, including the impacts on Green Belt purposes, the proposed Green Belt boundaries and proposals for compensatory improvements to remaining Green Belt, under a subsequent matter.

The GMCA response to PQ72 advises that the thematic policies in Chapter 8 provide a strategic framework for local plans and informing the preparation and determination of planning applications.

Policy JP-G10 The Green Belt

The GMCA response to PQ38 (a) advises that the reference to ‘strong protection’ is intended to summarise NPPF 147 to NPPF 151.

The GMCA response to PQ38 (b) advises that the reference to ‘managed positively’ repeats what is set out in the second paragraph of the policy and proposes a modification to that effect. The GMCA response to PQ38 (c) advises that the reference to ‘positive and beneficial use’ were intended to reflect the requirements of NPPF 145 but acknowledge it could cause confusion. A modification is proposed to that effect.

Policy JP-G10 (third paragraph) refers to the proposed application of Green Belt policies to the strategic allocations that the Plan removes from the Green Belt, “except in the case of planning applications complying with the relevant allocations policies” The GMCA response to PQ38 (d) advises that without this element of the policy, the land could be vulnerable to less desirable development which may not achieve the overall objectives of the Plan.

The GMCA response to PQ38 (e) advises that the policy is not intended to change to the approach to altering established Green Belt boundaries set out in NPPF 140 to NPPF 142.

The GMCA response to PQ74 advises that references to the NPPF (first part of the policy) are not necessary and proposes a modification to that effect.

Q9.12. Is Policy JP-G10 justified, effective and consistent with national policy? In particular:

- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
- b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

Q9.13. Are the proposed modifications to policy JP-G10 necessary to make the Plan sound? If so, are they effective in that regard?

Policy JP-G11 Safeguarded land in the Plan

Policy JP-G11 identifies one area of safeguarded land adjacent to the proposed HS2 Manchester Airport Station, and this is identified on the Policies Map. Paragraph 8.66 of the Plan refers to “a small number of sites” being identified as safeguarded land. The GMCA response to PQ39 indicates the reference to a small number of sites is an error and proposes a modification to paragraph 8.66 of the Plan to this effect.

Policy JP-G11 states that safeguarded land will only be released for development through a review of the Plan or through the preparation of a local plan, and if four defined criteria are met. The GMCA response to PQ40 indicates that this would apply to only the one area of safeguarded land and proposes modifications to this effect.

Q9.14. Is Policy JP-G11 justified, effective and consistent with national policy? In particular:

- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?
- b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

Q9.15. Are the proposed modifications to policy JP-G11 necessary to make the Plan sound? If so, are they effective in that regard?

Matter 10 Places for People

This matter is concerned with policy JP-Strat 12 and the thematic policies in Chapter 9 of the plan relating to sustainable places, heritage, cultural facilities, retail and leisure uses in town centres, education, skills and knowledge, health, sport and recreation.

Issue 10.1 Are policies JP-P1 to JP-P7 justified, effective and consistent with national policy?

The GMCA response to PQ71 and PQ72 advises that JP-Strat12 and the thematic policies in Chapter 9 provide a strategic framework for local plans and informing the preparation and determination of planning applications. In addition, JP-P2 sets specific requirements to be taken forward in local plans.

Policy JP-P1 Sustainable Places

Q10.1. Is Policy JP-P1 justified, effective and consistent with national policy? In particular:

- a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?

b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

Policy JP-P2 Heritage

NPPF 189 indicates that there are a range of heritage assets and refers to that these should be conserved in a manner appropriate to their significance. NPPF 190 sets out that plans should set out a positive strategy for the conservation and enjoyment of the historic environment and sets out several factors to be taken into account in the strategy.

Q10.2. Is Policy JP-P2 justified, effective and consistent with national policy? In particular:

a) Will JP-P2 be effective in dealing with designated and non-designated heritage assets?

b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans with particular regard to be able to determine which specific requirements are to be taken forward into local plans?

c) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

d) Is JP-P2 justified and consistent with national policy, in particular NPPF 190 (Criteria c and d) relating to character and distinctiveness?

Policy JP-P3 cultural facilities

Policy JP-P3 refers to 'Creative Improvement Districts' (CIDs). The GMCA response to PQ95 advises that CIDs are intended as culture and creative-led regeneration programmes consistent with appropriate local planning frameworks. A modification is proposed to clarify the purpose of CIDs.

Q10.3. Is Policy JP-P3 justified, effective and consistent with national policy? In particular:

a) Is it clearly written such that it will provide an effective strategic framework to inform (i) the preparation of local plans and (ii) the preparation and determination of planning applications?

b) The requirements of the policy relating to the Creative Improvement Districts (Criteria 7 and 8).

Q10.4. Is the proposed modification to the supporting text for policy JP-P3 necessary to make the Plan sound? If so, are they effective in that regard?

Policy Strat12 Main Town Centres and Policy JP-P4 New Retail and Leisure uses in Town Centres

The GMCA response to PQ46 advises that references the principal town centres on the Key Diagram are those referred to in JP-Strat12 and JP-P4.

Q10.5. Are policies JP-Strat12 and JP-P4 justified, effective and consistent with national policy? In particular:

a) Are they clearly written such that it will provide an effective strategic framework to inform (i) the preparation of local plans and (ii) the preparation and determination of planning applications?

b) Are the requirements of policy JP-P4 relating to the hierarchy of town centres sufficiently clear?

Policy JP-P5 Education, Skills and Knowledge

NPPF 95 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities.

Q10.6. Is Policy JP-P5 justified, effective and consistent with national policy? In particular:

a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans?

b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

Policy JP-P6 Health

Q10.7. Is Policy JP-P6 justified, effective and consistent with national policy? In particular:

a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans and,

b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications, with particular regard to the requirements for Health Impact Assessments?

Policy JP-P7 sport and recreation

Bullet 2 of Policy JP-P7 refers to developing a 'common standard' for provision of designated play areas. The GMCA response to PQ96 advises that the standard has yet to be developed and that once developed it would be applied at the local level. A modification is proposed to align the supporting text with the policy.

Q10.8. Is Policy JP-P7 justified, effective and consistent with national policy? In particular:

a) Is it clearly written such that it will provide an effective strategic framework to inform the preparation of local plans with particular regard to the development of a 'common standard for designated play areas' (Criterion 2)?

b) Is it clearly written such that it will provide an effective strategic framework to inform the preparation and determination of planning applications?

c) Are the requirements relating to standards (Criteria 3,4 and 7) justified?

d) Is the requirement relating to the location of recreation facilities (Criterion 5) justified?

Q10.9. Is the proposed modification to the supporting text for policy JP-P7 necessary to make the Plan sound? If so, are they effective in that regard?

Matter 11 Connected Places

We consider various transport issues, including the impacts of development on the road network, under other matters including those relating to the spatial strategy and site allocations. This matter is concerned with policy JP-Strat14 and the seven thematic policies in chapter 10 of the Plan relating to transport and digital connectivity.

The GMCA response to PQ72 advises that, as well as providing a strategic framework for local plans and informing the preparation and determination of planning applications, these policies are intended to support and facilitate the delivery of the Greater Manchester Transport Strategy 2040.

The GMCA response to PQ74 proposes various main modifications to those policies relating to the references to Global Street Design, Five Year Transport Delivery Plan, Bee Network, and national and locally adopted design guidance.

Issue 11.1 Are transport policies JP-Strat14, JP-C1 and JP-C3 to JP-C7 justified, effective and consistent with national policy?

Q11.1. Are transport policies JP-Strat14, JP-C1 and JP-C3 to JP-C7 justified and consistent with national policy? In particular:

- a) The various references to investment in infrastructure (JP-Strat14, JP-C1 and JP-C3)?
- b) Following the Global Street Design Guide hierarchy (JP-C1).
- c) Development being planned with walking and cycling as the primary means of local access and fully integrated into the existing walking and cycling infrastructure (JP-C5)
- d) The transport requirements for new development (JP-C7)

If not, would the GMCA proposed modifications make those policies sound?

Q11.2. Are policies JP-Strat14 and JP-C1 to JP-C7 clearly written such that they will provide an effective strategic framework to inform (a) the preparation of local plans and (b) the preparation and determination of planning applications?

Q11.3. Is it legally compliant and consistent with national policy for JP-Strat14 and JP-C1 to JP-C7 to support and facilitate the delivery of the Greater Manchester Transport Strategy 2040?

Issue 11.2 Is policy JP-C2 relating to digital connectivity justified, effective and consistent with national policy?

Q11.4. Is policy JP-C2 relating to digital connectivity justified, effective and consistent with national policy? In particular:

- The expectation that developers will work and share costs with telecoms operators as appropriate to maximise coverage and enable consumers to make informed choices.
- The expectation that internet connections will work immediately when residents move into new properties.
- The requirement for all new developments to have full fibre to premises connections unless technically infeasible, and to incorporate multiple-ducting compliant with telecoms standards.

Matter 12 Delivering the Plan

Paragraph 12.1 states that the level of growth proposed in the Plan will require substantial amounts of investment from both the public and private sector, and that it is therefore important that it is supported by sources of funding and delivery mechanisms that are both timely and appropriate. Paragraph 12.3 lists various delivery mechanisms that will be used by the nine local authorities, the Mayor and the GMCA in partnership with other agencies and organisations and the private sector.

Policy JP-D1 – Infrastructure Implementation

The GMCA response to PQ74 proposes a modification to criteria 3 to replace the expectation that investment providers would ‘have regard to’ the Plan, rather than an expectation they should be consistent with it.

It also proposes a modification to criterion 6 that would expect developers to ‘have regard to’ an infrastructure and phasing strategy they are required to prepare in support of any application.

Q12.1. Policy JP-D1 starts by stating “to make this happen we will ...” Is it sufficiently clear what the purpose of the policy is and what criteria 1-9 are seeking to achieve? Is a modification required to ensure the plan is effective in this regard?

Q12.2. a) Are all criteria in policy JP-D1, in particular 1-4, 8 and 9, clear and unambiguous such that it is evident to a decision maker how they should react to development proposals? In addition, how would local authorities be expected to have regard to these criteria in preparing district local plans? b) Is the proposed modification to criterion 3 necessary for soundness?

Q12.3. Is criterion 4 of policy JP-D1 justified and consistent with the relevant legislation on planning obligations and national policy, particularly NPPF 34 and 56-58?

Q12.4. a) In referring to ‘strategic sites’ does criterion 6 of policy JP-D1 relate only to allocations in the Plan or is it intended to refer to any site identified as ‘strategic’ in district local plans? b) Is the proposed modification to criterion 6 necessary for soundness?

Q12.5. Is criterion 7 of policy JP-D1 justified and consistent with national policy? In particular:

a) Do any aspects of the criterion duplicate other statutory or regulatory regimes for the provision of utility infrastructure and is the criterion consistent with NPPF 56-58 and relevant legislation in terms of planning obligations?

b) How do requirements in this criterion for full fibre digital connections and decentralised energy networks relate to policies JP-C2 and JP-S3 respectively?

Policy JP-D2 – Developer Contributions

Policy JP-D2 sets out requirements for developers relating to the use of planning conditions, “legal contracts” and community infrastructure levy, and to viability assessments in support of planning applications.

The GMCA response to PQ74 proposes a modification to the second paragraph of policy JP-D2 to refer to relevant “material considerations” rather than “documents”.

Q12.6. Is policy JP-D2 justified, consistent with national policy and effective? In particular:

a) Is policy JP-D2 consistent with NPPF 57 which sets out the circumstances in which planning obligations may be sought?

b) Is policy JP-D2 consistent with NPPF 58 and PPG ID:10-007 and 10-008 which sets out the circumstances in which viability assessments may be considered as part of a planning application?

c) Is the reference to ‘legal contracts’ in the first paragraph of policy JP-D2 intended to refer to anything other than S106 agreements or S278 of the Highways Act as referred to in paragraph 12.16?

End of IN9 Annex 2