

IN19 Action Points from weeks 2 and 3 hearing sessions

Proposed modifications to the policy/reasoned justification is shown as black struck through deletions and underlined additions. The green text is modifications previously published in PMM2.1. Where green text is both underlined and struck through, this indicates that the previously proposed modification in PMM2.1 is now proposed to be deleted.

M3. Site Selection Methodology

Mineral Safeguarding Areas and Site Allocations

AP9. GMCA to prepare main modifications to clarify that development proposed on each allocation in the Plan that is within a minerals safeguarding area defined in the Greater Manchester Joint Minerals Plan will be expected to demonstrate compliance with policy 8 of that plan or any relevant policies in subsequent minerals plans (and which allocations are within which minerals safeguarding area).

PfE Response

1.1 Main modifications are proposed to the policy text and reasoned justification for all the allocations which include a Mineral Safeguarding Area (MSA), as identified in the Greater Manchester Joint Minerals Plan. This is in order to set out a clear and unambiguous policy framework for these allocations. These modifications relate to all allocations with the exception of the following, which do not contain a MSA:

- JPA 3.1 Medipark
- JPA 3.2 Timperley Wedge
- JPA 10 Global Logistics
- JPA 15 Chew Brook Vale (Robert Fletchers)
- JPA 16 Cowlshaw
- JPA 28 North of Irlam Station
- JPA 36 Pocket Nook

1.2 The following new policy requirement is proposed to be added to the relevant allocations:

Consider the extraction of any viable mineral resources within Mineral Safeguarding Areas, in accordance with Policy 8 of the Greater Manchester Joint Minerals Development Plan (or any relevant policies in subsequent minerals plans).

1.3 The following modifications will also be required to the reasoned justification of the relevant allocations. This is set out in the table below.

Allocation	MSA Reasoned Justification text
Cross boundary allocations	
JPA 1.1 Heywood / Pilsworth	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (3.9% of the site); sand and gravel (10.2%); surface coal (99.4%); and brickclay (99.4%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised</u>
JPA1.2 Simister / Bowlee	<u>The allocation is identified as containing Mineral Safeguarding Areas for sand and gravel (2.9%); surface coal (63.9%); and brickclay (63.9%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised</u>
JPA2 Stakehill	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.6% of the site); sand and gravel (97.5%); and surface coal (99.6%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Bolton	
JPA4 Bewshill Farm	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (98.8% of the site); surface coal (98.8%); and brickclay (98.8%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA5 Chequerbent North	<u>The allocation is identified as containing Mineral Safeguarding Areas for surface coal (99.8%); and brickclay (99.8%) as defined in the Greater</u>

Allocation	MSA Reasoned Justification text
	<u>Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA6 West of Wingates	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (11.5% of the site); surface coal (99.4%); and brickclay (99.4%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Bury	
JPA7 Elton Reservoir	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (15.5% of the site); sand and gravel (40.2%); surface coal (96.2%); and brickclay (96.2%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA8 Seedfield	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (5.4% of the site); sand and gravel (36.4%); surface coal (64%); and brickclay (64%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA9 Walshaw	<u>The allocation is identified as containing Mineral Safeguarding Areas for sandstone (6.3% of the site); sand and gravel (9.8%); surface coal (94.3%); and brickclay (94.3%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any</u>

Allocation	MSA Reasoned Justification text
	<u>subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Oldham	
JPA12 Beal Valley	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (77.3% of the site); sand and gravel (11.9%); sandstone (2.4%) and surface coal (77.3%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA13 Bottom Field Farm	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (92.5% of the site); and surface coal (99.8%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA14 Broadbent Moss	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (79.3% of the site); sand and gravel (29.7%); sandstone (19.2%) and surface coal (79.3%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA17 Land south of Coal Pit Lane	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (96.4% of the site); and surface coal (96.4%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA18 South of Rosary Road	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (98.1% of the site); and surface coal (98.1%) as defined in the</u>

Allocation	MSA Reasoned Justification text
	<u>Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Rochdale	
JPA19 Bamford and Norden	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.9% of the site); sand and gravel (10.6%); sandstone (22.0%) and surface coal (99.9%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA20 Castleton Sidings	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (72.8% of the site); sand and gravel (57.8%); and surface coal (72.8%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA21 Crimble Mill	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (96.8% of the site); sand and gravel (52.8%); and surface coal (96.8%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA22 Land north of Smithy Bridge	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.6% of the site); sandstone (34.7%); and surface coal (99.6%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals</u>

Allocation	MSA Reasoned Justification text
	<u>plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA23 Newhey Quarry	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.7% of the site); sand and gravel (0.9%); sandstone (10.4%) and surface coal (99.7%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA24 Roch Valley	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.3% of the site); sandstone (94.5%) and surface coal (99.3%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA25 Trows Farm	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (100% of the site); sand and gravel (99.5%); and surface coal (100%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Salford	
JPA26 Hazelhurst Farm	<u>The allocation is wholly within the brick and clay Mineral Safeguarding Area as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA27 East of Boothstown	<u>The allocation is wholly within the brick and clay Mineral Safeguarding Area as defined in the Greater Manchester Joint Minerals</u>

Allocation	MSA Reasoned Justification text
	<u>Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA29 Port Salford Extension	<u>The allocation is identified as containing a Mineral Safeguarding Area for brick and clay (4.6%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Tameside	
JPA30 Ashton Moss West	<u>The allocation is identified as containing Mineral Safeguarding Areas for brick clay (92.4% of the site) and surface coal (92.4% of the site) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA31 Godley Green Garden Village	<u>The allocation is identified as containing Mineral Safeguarding Areas for brick clay (22.5% of the site), sand and gravel (29.0% of the site) and sandstone (1.7% of the site) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA32 South of Hyde	<u>The allocation is identified as containing Mineral Safeguarding Areas for brick clay (66.4% of the site), surface coal (66.4% of the site) and sandstone (13.7% of the site) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that</u>

Allocation	MSA Reasoned Justification text
	<u>specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Trafford	
JPA33 New Carrington	<u>The allocation is identified as containing a Mineral Safeguarding Area for sand and gravel (26.5%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
Wigan	
JPA34 M6 Junction 25	<u>The allocation is wholly within a Mineral Safeguarding Area for brickclay and surface coal as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA35 North of Mosley Common	<u>The allocation is wholly within a Mineral Safeguarding Area for brickclay and surface coal as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>
JPA37 West of Gibfield	<u>The allocation is identified as containing Mineral Safeguarding Areas for brickclay (99.7% of the site); sandstone (18.1%) and surface coal (99.7%) as defined in the Greater Manchester Joint Minerals Development Plan. The need for extraction prior to development commencing will be assessed against policies of that minerals plan (or any subsequent minerals plan) to ensure that specific mineral resources of local or national importance are not unnecessarily sterilised.</u>

M5. Diagrammatic maps (Figures 4.2 to 4.8 and Picture 4.2)

AP10. GMCA to keep under review potential changes that may be required to paragraph 4.20 and Figures 4.2 to 4.8 and Picture 4.2 as a result of relevant action points that we set out throughout the examination (including following discussion of matter 11 Connected Places and the site allocations) including with regard to:

- a) The status of the transport schemes indicated on the diagrams, and how they relate to other policies in the Plan including those that require transport improvements needed to facilitate development proposed.
- b) The geographical extent of the Core Growth Area as illustrated on Fig 4.2.
- c) Figure 4.3 to clarify that Salford Quays does not form part of the City Centre.
- d) Any other changes required as a result of further action points that we identify.

PfE Response

- 2.1 The PfE response to AP10 will be provided at the end of the Examination in response to relevant action points set by the Inspectors throughout the examination. This will include amendments to any other similar diagrams, such as Figure 6.1.

M5. Policies JP-Strat1 to JP-Strat11

AP11. GMCA to prepare revised main modifications to policies JP-Strat1 to JP-Strat11 and associated reasoned justification to include relevant figures for numbers of new homes and amount of employment floorspace, based on the updated 2022 land supply information and revised plan period 2022 to 2039, in the reasoned justification rather than the policy.

PfE Response

JP-Strat1

- 2.2 No change required to the modification proposed in PQ48.

JP-Strat2

- 2.3 It is proposed that policy JP-Strat2 be modified as per the PfE response to PQ49 and PQ50, however it is proposed to amend the previously proposed modification to paragraph 4.29, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

- 2.4 Proposed modification to paragraph 4.29:

“Although there is already a very high level of activity within the City Centre, the area has significant development potential and will be the largest source of new jobs and homes in Greater Manchester over the next few decades.

Over the period ~~2020-2037~~ 2022- 2039, land to accommodate around ~~2,200,000~~ 1,700,000 sqm of office floorspace, around ~~56,000~~ 54,000 new dwellings and minimal industry and warehousing (just ~~over 35,000~~ under

38,000 sqm) has been identified within the City Centre. The City Centre offers significant opportunity to maximise the use of previously developed land. It will enable the delivery of a range of...”

JP-Strat3

2.5 It is proposed that policy JP-Strat-3 be modified as per the PfE response to PQ49 and PQ50, however it is proposed to amend the previously proposed modification to paragraph 4.32, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.6 Proposed modification to paragraph 4.32:

“Although the Quays has seen very significant levels of investment in recent years, there is still enormous development potential within the area across all of its functions, including major expansion of the digital/creative cluster and significant residential opportunities. Over the period 2020—2037 2022-2039, land to accommodate around ~~192,000~~ 155,000 sqm of office floorspace, around ~~12,500~~ 12,200 new dwellings and minimal industry and warehousing (around 6,000 sqm) has been identified within the Quays. It offers significant opportunity to maximise the use of previously developed land by delivering large scale residential development close to a major source of jobs, education...”

JP-Strat4: No modification proposed

JP-Strat5

2.7 It is proposed that policy JP-Strat5 be modified as per the PfE response to PQ55, however it is proposed to amend the previously proposed modification to paragraph 4.41, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.8 Proposed modification to paragraph 4.41:

“Increasing housing provision in the inner areas would enable more people to access easily the opportunities of the Core Growth Area by walking, cycling and public transport and thereby reducing the need to travel. Maintaining a good supply of affordable housing will be especially important, helping to reduce travel costs for those on lower incomes who need access to the Core Growth Area for employment and services. Over the period 2020-2037 2022-2039, land to accommodate around ~~270,000~~ 175,000 sqm of office, around ~~86,500~~ ~~132,000~~ sqm of industry and warehousing and around ~~30,000~~ 35,000 new dwellings has been identified within the inner areas.”

JP-Strat6: No modification

JP-Strat7

2.9 It is proposed that policy JP-Strat7 be modified as per the PfE response to PQ57, however it is proposed to amend the previously proposed modification to paragraph 4.50, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.10 Proposed modification to the penultimate sentence of paragraph 4.50:

Land to accommodate almost one million sqm of new employment floorspace and around ~~19,000~~ ~~16,000~~ 20,000 new dwellings has been identified in the north east growth corridor.

JP-Strat8

2.11 It is proposed that policy JP-Strat8 be modified as per the PfE response to PQ60, however it is proposed to amend the previously proposed modification to paragraph 4.56, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.12 Proposed modification to the final sentence of paragraph 4.56:

Over the period ~~2020–2037~~ 2022-2039, land to accommodate just over 1 million sqm of new employment floorspace and approximately ~~13,000~~ 13,600 new dwellings has been identified within the area."

Policy JP-Strat9: no modification proposed

JP-Strat10

2.13 It is proposed that policy JP-Strat10 be modified as per the PfE response to PQ64, however it is proposed to amend the previously proposed modification to part 4, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.14 Proposed modification (Part 4)

Providing a minimum of ~~1,700~~ 1,800 new homes to the west of the M56 at Timperley Wedge, up to ~~2037~~ 2039 (See Policy JP Allocation 3.2 'Timperley Wedge')

JP-Strat11

2.15 It is proposed that policy JP-Strat11 be modified as per the PfE response to Q5.15, however it is proposed to amend the previously proposed modification to first paragraph, to take account of both a potential change in plan period from 2021 - 2037 to 2022 - 2039 and the updated land supply to a 2022 base date.

2.16 Proposed modification to first paragraph:

“Lying within the area and policy framework covered by JP-Strat 9 this policy seeks to deliver a significant mixed use development. Overall, around 5,000 new dwellings are expected to be delivered in the New Carrington area, Over the period 2020-2037 with land identified to accommodate around 4,300 dwellings and 350,000 365,000 sqm of employment floorspace has been identified and which will be delivered together with a new local centre over the period 2020-2037 2022-2039.”

AP12. GMCA to consider what main modifications would be required to policies JP-Strat1 to P-Strat11 to ensure consistency of approach across those policies in relation to general matters such as infrastructure provision and quality of design.

PfE Response

- 2.17 In response to AP12, Strat policies 1 to 11 have been reviewed in order to bring a greater level of consistency in respect of general issues. In doing so regard has also been had to issues that are adequately dealt with elsewhere in the plan and alternative policies could be relied upon instead. This includes issues such as design and social infrastructure dealt with under policies JP-P1 (Sustainable Places), JP-P5 (Education), JP-P6 (Health). The proposed modifications to policies JP-Strat 1 to 11 to address this action point, along with some of those proposed under AP11 to AP18, are shown below.

Policy JP-Strat1: Core Growth Area

The economic role of the Core Growth Area will be protected and enhanced, with sustainable development supporting a major growth in the number of jobs provided across the area providing opportunities to create jobs for local communities.

Complementary to, but not at the expense of, its economic function it will see a significant increase in the number and range of homes in areas with good connections to employment, training and education facilities. ~~These homes will be supported by necessary green spaces and social infrastructure and will be of an appropriate design.~~ In total sufficient land has been identified in the Core Growth Area for almost 98,000 new homes.

Infrastructure provision will support the growth and continued capacity of the Core Growth Area ~~having particular regard to the Greater Manchester Transport Strategy 2040 refresh and accompanying Delivery Plans.~~

Policy JP-Strat2: City Centre

The role of the City Centre as the most significant economic location in the country outside London will be strengthened considerably. The City Centre will continue to provide the primary focus for business, retail, leisure, culture and tourism activity in Greater Manchester, but the increasingly important residential role of the City Centre will be expanded ~~considerably by a range of high density new homes, supported by necessary infrastructure.~~

Development will generally be high density. It ~~Development~~ will enable people to take advantage of the access to education and training and the extensive public transport offer, reducing the need to travel to work whilst supporting economic growth and reducing levels of poverty.

It will be a priority for investment in development and infrastructure. This will include addressing current network capacity issues in the City Centre which will enable the future expansion of the rapid transit public transport network across Greater Manchester. Improvements in the public realm, walking and cycling facilities, and green infrastructure will help to enhance the local character and environmental quality of the City Centre so that it can rival city centres across the globe, enabling it to compete effectively at the international level for investment, businesses, skilled workers, residents and tourists. A broad range of commercial accommodation will be delivered, helping the City Centre to capture growth across key economic sectors.

The new functions within the City Centre will be delivered in a way that complement, rather than displace the area's non-residential functions and will seek to protect and enhance the city centre's historic environment and assets.

~~Over the period 2020-2037, land to accommodate around 2,200,000 sqm of office floorspace, around 56,000 new dwellings and minimal industry and warehousing (just over 35,000 sqm) has been identified within the City Centre.~~

Policy JP-Strat3: The Quays

The Quays will continue to develop as an economic location of national significance, characterised by a wide mix of uses. Its business, housing, leisure and tourism roles will all be significantly expanded, in a mutually supportive way, reinforcing the area's interest, vibrancy and unique identity ~~to reduce levels of unemployment and poverty in our communities.~~

Development will generally be high density. The high environmental quality of the Quays (including its public realm, green infrastructure, wildlife sites and heritage assets) will be protected and enhanced as one of its essential distinguishing features, and excellent, distinctive design will continue to be a priority.

~~Over the period 2020-2037, land to accommodate around 192,000 sqm of office floorspace, around 12,500 new dwellings and minimal industry and warehousing (around 6,000 sqm) has been identified within the Quays. The new homes will be a range of high density homes, close to major sources of jobs and education, supported by the necessary infrastructure and amenities. Major improvements in accessibility by public transport, cycling and walking will be sought, including much better links to key rail stations and greater connectivity with the City Centre.~~

Policy JP-Strat4: Port Salford

Port Salford will be developed as an integrated tri-modal facility, with on-site canal berths, rail spur and container terminal as essential elements of the scheme.

The overall facility will provide around 500,000 sqm of employment floorspace. This will include an extension of the permitted scheme onto land to the north and west of Barton Aerodrome, as allocated under Policy JP Allocation 29 'Port Salford Extension'.

The development of Port Salford must be delivered together with ~~ensure that~~ necessary transport infrastructure ~~is delivered~~, including highway improvements to accommodate the likely scale of traffic generation, in a way that is compatible with committed proposals for the enhancement of the wider motorway network and the provision of appropriate sustainable travel opportunities to meet the needs of the employees accessing the site. The growth of Port Salford will be managed to reflect the creation of additional capacity in the transport network and in accordance with the requirements of policy JPA29.

Policy JP-Strat5: Inner Areas

The continued regeneration of the inner areas will be promoted and will be linked to reducing levels of deprivation and poverty and supporting the improved health and wellbeing of the communities. High levels of ~~well-designed~~ new development will be accommodated in this highly accessible and sustainable location, ~~prioritising the use of previously developed land.~~

New development will be ~~of high quality, predominantly, residential (in providing a mix of size, type and tenure).~~ It will be supported by necessary infrastructure, including high quality open space and improved access to the wider green infrastructure network, together with improved transport and social infrastructure.

~~Where a mix of uses is being proposed, it will seek to protect the amenity of existing and new residents and it will seek to protect and enhance the location's historic and natural environment and assets.~~

~~New development and~~ will be integrated with existing communities, enhancing the quality of places and their local character, ~~including through good quality design, enhanced green infrastructure (and access to it) and improvements in air quality.~~ Infrastructure provision will facilitate the growth and continued capacity of the Inner Area, including high quality open spaces and improved access to the wider green infrastructure network.

~~Over the period 2020-2037, land to accommodate around 270,000 sq m of office, around 132,000 sq m of industry and warehousing and around 30,000 new dwellings has been identified within the inner areas.~~

Policy JP-Strat6: Northern Areas

A significant increase in the competitiveness of the northern areas will be sought.

There will be a strong focus on making as much use as possible of suitable previously-developed ~~prioritising the re-use of~~ (brownfield) land through urban regeneration, enhancing the role of the town centres and diversifying ~~increasing the mix, type, quality and range of~~ residential offer. This will be complemented by ~~improvements to transport connectivity and the allocation of sites for development identified in Chapter 11 of this plan, as identified in JP-Strat7 and JP-Strat8,~~ the selective release of Green Belt and previously safeguarded land in key locations that will help to boost economic opportunities and diversify housing provision ~~(GM-Strat7 and GM-Strat8).~~ Improving transport connections and accessibility by public transport, cycling and walking will be a priority to ensure access to key employment opportunities. In supporting the principles of inclusive growth, the significant increases in economic growth in this location will help to reduce deprivation.

~~Development in this location will be of good quality and design, supported by the necessary infrastructure and amenities including improved access to green spaces.~~

~~Development in this location, particularly that on land which is being proposed to be released from the Green Belt, will seek to identify opportunities to protect and enhance the natural and historic environments to improve the local character.~~

Policy JP-Strat7: North-East Growth Corridor

Lying within the area and policy framework covered by JP-Strat 6, the North-East Growth Corridor which extends eastwards from Junction 18 of the M62 will deliver a nationally-significant area of economic activity ~~and growth.~~ This ~~which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix,~~ thereby delivering truly inclusive growth over the lifetime of the Plan.

~~Over the period 2020-2037, land to accommodate almost 1 million sqm of new employment floorspace and around 19,000 new dwellings has been identified within the whole Growth Corridor.~~

Specifically this Plan allocates ~~two~~three major sites within the area, ~~and makes associated changes to the Green Belt boundaries,~~ as identified in Chapter 11 to support this growth:

- Policy JP Allocation 1.1 'Heywood / Pilsworth (Northern Gateway)'
- Policy JP Allocation 1.2 'Simister and Bowlee (Northern Gateway)'
- Policy JP Allocation 2 'Stakehill'

~~In addition to these twothree allocations, there is considered to be a potential opportunity for further expansion of the economic and residential offer in the eastern-most part of this key gateway location. As such the Key Diagram identifies the High Crompton Broad Location. The land will remain in the Green Belt until such time that a review of this Plan and / or the Oldham Local Plan can demonstrate that it is necessary. The opportunity presented by the High Crompton Broad Location would serve to meet future employment and housing needs and demand of businesses and local communities in this part of the conurbation well beyond the end of the Plan period. Well designed, sustainable development at this Broad Location would diversify further the employment and housing offer in Oldham by ensuring truly inclusive growth could be achieved which would help to reduce further the levels of deprivation and poverty.~~

~~The development of the area must ensure that necessary infrastructure is delivered to accommodate the likely scale of development.~~

Policy JP-Strat8: Wigan-Bolton Growth Corridor

Lying within the area and policy framework covered by JP-Strat 6, the Wigan – Bolton Growth Corridor will deliver a regionally-significant area of economic and residential development.

New highway infrastructure ~~will~~ is intended to connect Junction 26 of the M6 and Junction 5 of the M61 including public transport provision. Measures to improve the provision of bus services and to increase the use of rail lines are also planned, ~~will be implemented~~, potentially including a Wigan to Bolton Quality Bus Transit corridor, conversion of the Atherton line to allow for metro/tram-train services, and the electrification of the Bolton to Wigan line.

~~Over the period 2020-2037, land to accommodate just over 1million sqm of new employment floorspace and approximately 13,000 new dwellings has been identified within the area.~~

~~The majority of this new development will be on previously developed land, within the urban area. However, in order to meet the overall spatial strategy, Specifically this Plan allocates the following sites as identified in Chapter 11, within the area, and makes associated changes to the Green Belt, to further support the success of the growth corridor:~~

- Policy JP Allocation 4 'Bewshell Farm'
- Policy JP Allocation 5 'Chequerbent North'
- Policy JP Allocation 6 'West of Wingates / M61 Junction 6'
- Policy JP Allocation 34 'M6 Junction 25'
- Policy JP Allocation 37 'West of Gibfield'

In addition, the following will also be supported:

- The restoration of Hulton Park, and the provision of a Ryder Cup standard golf course and associated leisure and tourism facilities
- The development of ~~land at Bolton Royal Hospital~~ a health innovation cluster, including a health village on land at Royal Bolton Hospital.

Policy JP-Strat9: Southern Areas

The economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced. There will be a strong emphasis on ~~prioritising the re-use~~ making as much use as possible of suitable previously developed ~~of (brownfield) land~~ and promoting the roles of the areas' town centres and its other key assets, including education and training facilities enabling people to gain access to employment opportunities. ~~There will be an increase in the mix, type, quality and range of residential offer and a strengthening of its economic role. This will be complemented by improvements to transport connectivity, local character and the selective release of Green Belt in key locations~~ aAs identified in Chapter 11 of this Plan a number of sites have been specifically allocated through this Plan in support of the area's future growth.

The economic potential of, and benefits of investment in Altrincham, Trafford's Main Town Centre and Manchester Airport, along with associated transport infrastructure will be maximised. There will be an emphasis on improving transport connections and accessibility by public transport, cycling and walking, ensuring access to key employment opportunities in this area. ~~Development in these areas will contribute to reducing poverty and will be inclusive.~~

~~Development in these locations will be of good quality and design, supported by the necessary infrastructure and amenities and will seek to identify opportunities to protect and enhance the natural and historic environments and to improve the local character.~~

Policy JP-Strat10: Manchester Airport

Lying within the area and policy framework covered by JP-Strat 9 this policy seeks to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and its surrounding locality. Development which is in line with:

- Government policy and
- Manchester's Local Plan policies and
- ~~Manchester Airport Group's Corporate Social Responsibility Strategy~~

will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. With high quality services and facilities it will be the UK's principal international gateway outside London. The airport and its surrounding locality will make a major contribution to the competitiveness of the North, Midlands and Wales by supporting inward investment, international trade and tourism, high quality new homes and

supporting our economic and social regeneration. It will be central to raising our global profile and economic performance.

The accessibility and connectivity of the area will be greatly enhanced, including through:

- A. The development of a new HS2 station immediately to the west of the airport;
- B. Northern Powerhouse Rail connections to other city regions;
- C. The construction of the Western Leg extension of Metrolink via the proposed HS2 station, connecting through Davenport Green back to the existing line near Wythenshawe Hospital;
- D. Improved local public transport services and connections such as Bus Rapid Transit links by a new spine road through the Timperley Wedge allocation towards Altrincham;
- E. Improved local public transport services and connections, including to Stockport and Cheshire East areas;
- F. The provision of a network of cycling and walking routes.

The benefits of the exceptional connections will be maximised, including by:

1. Completing the development of Airport City immediately around the airport, which will provide a total of around 500,000 sqm of office, logistics, hotel and advanced manufacturing space ([See Policy JP Allocation 10 'Global Logistics' and Manchester Local Plan](#));
2. Continuing to develop Medipark and Roundthorn Industrial Estate as a health and biotech cluster, taking advantage of the research strengths of the adjacent Wythenshawe Hospital and the wider Manchester University NHS Foundation Trust ([See Policy JP Allocation 3.1 'Medipark' and Manchester Local Plan](#));
3. Delivering approximately 60,000 sqm of office floorspace around the new HS2 Station ([See Policy JP Allocation 3.2 'Timperley Wedge'](#));
4. Providing a minimum of 1,700 new homes to the west of the M56 at Timperley Wedge, up to 2037 ([See Policy JP Allocation 3.2 'Timperley Wedge'](#));
5. Providing sufficient development opportunities to take full advantage of the introduction of HS2 and NPR into this location.

This Plan allocates three sites near the airport, ~~and makes associated changes to the Green Belt boundaries,~~ as identified in Chapter 11 to support these developments:

- Policy JP Allocation 3.1 'Medipark'
- Policy JP Allocation 3.2 'Timperley Wedge'
- Policy JP Allocation 10 'Global Logistics'

Policy JP-Strat11: New Carrington

Lying within the area and policy framework covered by JP-Strat 9 this policy seeks to deliver a significant mixed use development. Overall, around 5,000 new dwellings are expected to be delivered in the New Carrington area, Over the period 2020-2037 with land identified to accommodate around 4,300 dwellings and 350,000 365,000 sqm of employment floorspace has been identified and which will be delivered together with a new local centre over the period 2020-2037 2022-2039.

New development will be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character, ~~including through good quality design, enhanced green infrastructure (and access to it)~~ and ensuring that maximum regeneration benefits are secured.

Major investment in active travel, public transport and highway infrastructure, such as the Carrington Relief Road, improvements to Junction 8 of the M60 and public transport corridors will be delivered to support the development of New Carrington, ensuring it is well-connected to the rest of Greater Manchester.

Policy JP Allocation 33 'New Carrington' allocates the development site and provides more detailed requirements for its implementation.

JP-Strat6 Northern Areas

AP13. GMCA to prepare main modifications to:

- a) Add the areas covered by policy JP-Strat6 to the reasoned justification paragraphs 4.43 to 4.48 (as set out in paragraph 4.21 of the Plan).
- b) Amend policy JP-Strat6 in line with proposed main modification for JP-Strat9 to refer to the Green Belt changes being as those set out in chapter 11.
- c) Amend the second sentence of policy JP-Strat6 to read "There will be a strong focus on making as much use as possible of suitable previously-developed (brownfield) land through urban regeneration ..."

PfE Response:

- 3.1 In response to a) it is proposed that the first sentence of paragraph 4.43 is modified as follows:

4.43 Over recent years, the northern areas of Greater Manchester, namely Bolton, Bury, Oldham, Rochdale, Tameside, Wigan, and west Salford, have seen relatively low levels of growth overall compared to other parts of the city region, and this is forecast to continue.

- 3.2 In response to b) and c), the required amendments to Policy JP-Strat 6 are set out below as underlined and struckthrough black text. Other main

modifications that the GMCA has previously proposed to the policy are set out in green, italic text as per MM PQ56, MM Q5.9, MM PQ63 and MM PQ56:

Policy JP-Strat 6 Northern Areas

A significant increase in the competitiveness of the northern areas will be sought. There will be a strong focus on making as much use as possible of suitable previously-developed ~~prioritising the re-use of (brownfield) land~~ through urban regeneration, enhancing the role of the town centres and increasing the mix, type, quality and range of residential offer. This will be complemented by ~~improvements to transport connectivity and~~, as identified in JP-Strat7 and JP-Strat8, ~~the selective release of Green Belt and previously safeguarded land in key locations~~ the allocation of sites for development as identified in Chapter 11 of this Plan, that will help to boost economic opportunities and diversify housing provision. ~~(GM-Strat7 and GM-Strat8).~~ Improving transport connections and accessibility by public transport, cycling and walking will be a priority to ensure access to key employment opportunities. In supporting the principles of inclusive growth, the significant increases in economic growth in this location will help to reduce deprivation.

Development in this location will be of good quality and design, supported by the necessary infrastructure and amenities including improved access to green spaces.

Development in this location, particularly that on land which is being proposed to be released from the Green Belt, will seek to identify opportunities to protect and enhance the natural and historic environments to improve the local character.

JP-Strat7 North East Growth Corridor

- 3.3 The fourth paragraph of policy JP-Strat7 refers to “the High Crompton Broad Location” having the potential for “further expansion of the economic and residential offer”. However, it is not clear why this particular location, which is in the Green Belt, is singled out as having this potential, or how it would relate to other reasonable alternative locations for housing and economic development to be considered through a future review of the Plan or through local plans for Oldham, Rochdale or other parts of Greater Manchester. We are not therefore persuaded that this element of policy JP-Strat7 is justified or would provide an effective framework for local plans.

AP14. GMCA to prepare main modifications to delete the fourth paragraph of policy JP-Strat7 relating to “the High Crompton Broad Location” (and amend Picture 4.2 and Figure 3.1 Key Diagram accordingly).

PfE Response

- 3.4 Delete paragraph 4 of Policy JP-Strat 7 North-East Growth Corridor as follows, to ensure the policy is justified and provides an effective framework for local plans:

~~In addition to these two allocations, there is considered to be a potential opportunity for further expansion of the economic and residential offer in the eastern most part of this key gateway location. As such the Key Diagram identifies the High Crompton Broad Location. The land will remain in the Green Belt until such time that a review of this Plan and / or the Oldham Local Plan can demonstrate that it is necessary. The opportunity presented by the High Crompton Broad Location would serve to meet future employment and housing needs and demand of businesses and local communities in this part of the conurbation well beyond the end of the Plan period. Well designed, sustainable development at this Broad Location would diversify further the employment and housing offer in Oldham by ensuring truly inclusive growth could be achieved which would help to reduce further the levels of deprivation and poverty.~~

Consequential changes will also be made to para 4.49, Figure 3.1 Key Diagram and Picture 4.2 North-East Growth Corridor to remove references to the High Crompton Broad Location.

AP15. GMCA to consider whether the reference in paragraph 4.51 (“additional investment in the motorway network will be required to support the scale of development proposed within the North East Growth Corridor ...”) is justified by the available evidence¹ and consistent with other parts of the Plan.

PfE Response

- 3.5 Yes – the sentence is justified and is evidenced within the various Locality Assessment documents and the SRN Future Work Programme Technical Note (OD5 and OD5.1) – this conclusion is based on a precautionary approach within the transport modelling and will be subject to on-going review in collaboration with National Highways. This is consistent with the reasoned justification and policy for relevant allocations (JPA1.1, JPA1.2, JPA2) and potential interventions are to be listed in a new appendix.

JP-Strat8 Wigan-Bolton Corridor

- 3.6 Policy JP-Strat8 sets out that “New highway infrastructure will connect Junction 26 of the M6 and Junction 5 of the M61 including public transport provision”. Two link roads are shown on Fig 4.6.

AP16. GMCA to clarify the status of the link roads, and whether the inclusion within policy JP-Strat8 is justified and also necessary for any of the development proposals in the Plan.

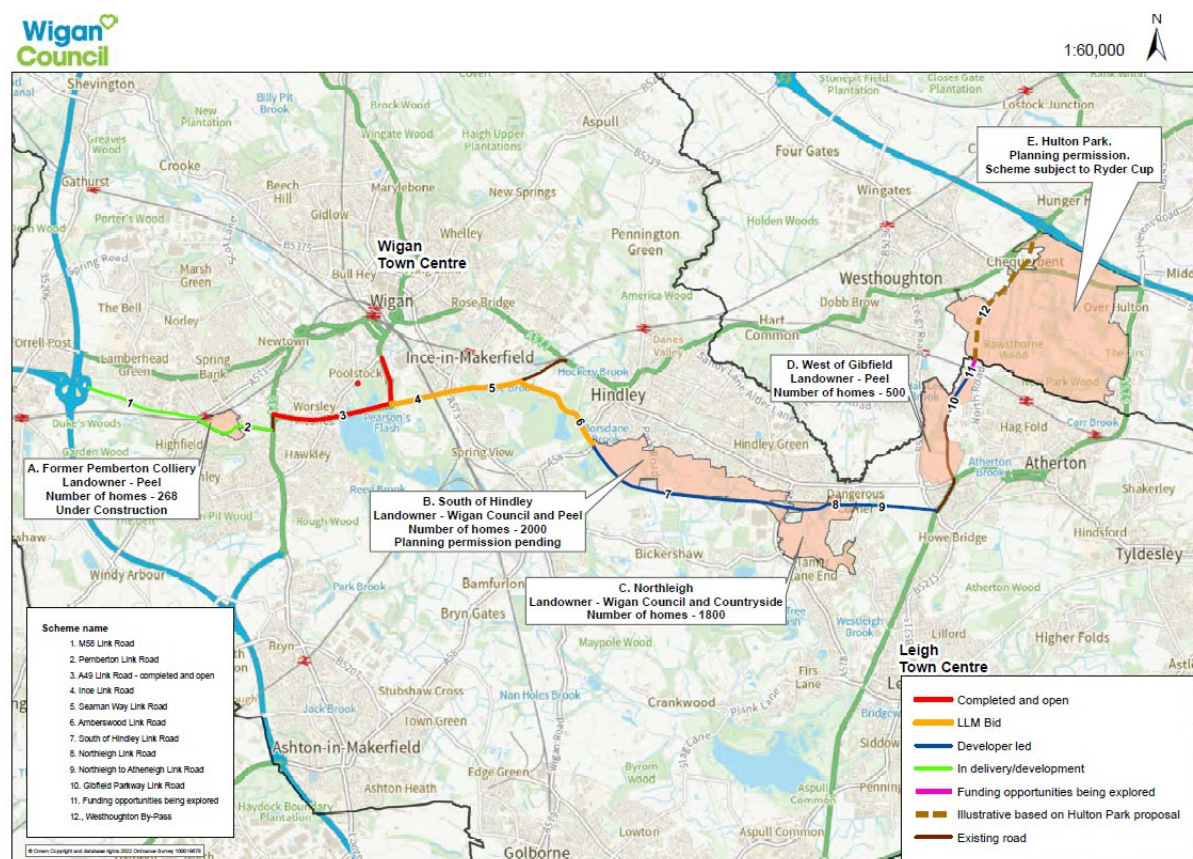
PfE Response

M6 Junction 26 to M61 Junction 5

¹ Including evidence relating to the Strategic Road Network [OD5, OD5.1 and OD5.2].

- 3.7 The link road from M6 Junction 26 to M61 Junction 5 is a longstanding ambition of both Wigan and Bolton Councils as set out in the recent joint bid (totalling £186.3m) through the Housing Infrastructure Fund in 2020, which would have funded its delivery. Wigan Council has subsequently submitted a funding bid to deliver parts of the route as part of the Government's current Large Local Majors (LLM) funding programme, and is awaiting a decision. This ambition is also demonstrated by the GMCA identifying the corridor as a Growth Location in October 2022 as an Investment Zone Expression of Interest, due to its strategic role and importance.
- 3.8 The M6 – M61 link road is identified in Transport Strategy 2040, 5 Year Delivery Plan as new highway infrastructure on the Delivery Plan Maps 2 and 3 with potential to be delivered by 2026 or later, subject to funding and business case approval.
- 3.9 Streets for All principles will be applied to the design of new sections of highway and facilities to improve walking, cycling, and public transport journeys will be required on both new and existing routes. Where traffic is removed from heavily congested local communities, carriageway space will be reallocated on existing streets from motor vehicles to walking, cycling and public transport as well as providing new and improved public spaces, to 'lock in' the benefits for local communities.
- 3.10 The planning status of the link road is illustrated in Figure 1 below. This demonstrates that its status differs along its route and that sections are being delivered incrementally in conjunction with new development. Various stages of delivery include:
- Completed and operational - A49 Link Road
 - In delivery / development (permissioned) – M58 Link Road; Pemberton Link Road
 - Developer led, as required by policies in the adopted Wigan Local Plan Core Strategy – South of Hindley link road; Northleigh link road; Northleigh to Atherleigh Way link road
 - Subject to current LLM bid – Ince Link Road; Seaman Way Link Road; Amberswood Link Road
 - Subject to Ryder Cup selection, planning approvals for significant developments at Hulton Park would provide developer led delivery of the majority of the Bolton element of the road, from M61 junction 5 southwards, through Lee Hall, to the edge of the permitted site boundary. A memorandum of understanding has also been drafted between Bolton and Wigan councils and the landowner to secure commitment of all parties to actively pursue funding opportunities to deliver the southernmost element of the road, including over the Atherton railway line and into Wigan.

Figure 1



West of Westhoughton Link Road

- 3.11 While this link road is shown indicatively on Fig 4.6 it is not referred to directly within policy JP-Strat8.
- 3.12 The West of Westhoughton link road is identified in Transport Strategy 2040, 5 Year Delivery Plan as a new highway link associated with new development on Delivery Plan Map 3. Map 3 interventions need further investigation or development in order to identify future options and determine feasibility. This work may identify interventions that could be delivered by 2026, but most are longer term projects that would be delivered in later years.
- 3.13 The plan is illustrative of an aspiration to provide at some stage a West of Westhoughton bypass. This route has no formal status in planning or transport terms and is not required to ensure the delivery of any of the allocations in PfE.
- 3.14 In the light of the above and uncertainties around this road link, the GMCA response to IN10 [\[M16.1\]](#) paragraphs 16.65-16.68 proposed a main modification [\[PMM2\]](#) page 41 in respect of JPA 6 West of Wingates. This removed the criterion 3 requirement for delivery of the road from the A6 to Westhoughton while adding to the supporting text the desire to protect an

alignment for a transport corridor from Westhoughton, through Bowlands Hey, across the site to the A6 and to the north to link with the De Havilland Way corridor and junction 6 of the M61.

- 3.15 Given the uncertainties associated with this West of Westhoughton link road it is difficult to justify its inclusion on Fig 4.6 and it could be removed.
- 3.16 However, the inclusion of the M6 Junction 26 to M61 Junction 5 link road, is justified. While it is not necessary for any of the allocations in the plan, delivering the longstanding ambition for the road is critical to maximising the economic and housing opportunities in the Wigan-Bolton Corridor through the co-ordinated provision of transport infrastructure. Furthermore, it is evident that significant efforts are continuing to deliver this route, including exploration of delivery and funding mechanisms with the active support of both councils and the landowner.

AP17. GMCA to prepare a main modification to amend policy JP-Strat8 in line with proposed main modification for JP-Strat9 to refer to the Green Belt changes being as those set out in chapter 11.

PfE Response

- 3.17 Amend Policy JP-Strat 8 Wigan-Bolton Corridor as follows:

~~“The majority of this new development will be on previously developed land, within the urban area. However, in order to meet the overall spatial strategy, Specifically this Plan allocates the following sites within the area, , and makes associated changes to the Green Belt, as identified in Chapter 11 to further support the success of the growth corridor:~~

- Policy JP Allocation 4 'Bewshill Farm'
- Policy JP Allocation 5 'Chequerbent North'
- Policy JP Allocation 6 'West of Wingates / M61 Junction 6'
- Policy JP Allocation 34 'M6 Junction 25'
- Policy JP Allocation 37 'West of Gibfield'

JP-Strat9 Southern Areas

AP18. GMCA to prepare a main modification to the first paragraph of policy JP-Strat9 to replace the reference to “prioritising the re-use of brownfield land” with “making as much use as possible of suitable previously developed (brownfield) land”.

PfE Response

- 3.18 Modify the first paragraph of policy JP-Strat 9 as follows:

The economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and

enhanced. There will be a strong emphasis on ~~prioritising the re-use of brownfield land~~ making as much use as possible of suitable previously developed (brownfield) land and promoting the roles of the areas' town centres and its other key assets...

M6. Sustainable and Resilient Places

AP19. GMCA to prepare a main modification to replace the reference to “Preference will be given to using previously developed land...” in the second paragraph of policy JP-S1 with “As much use as possible will be made of suitable previously-developed (brownfield) land...”.

PfE Response

- 4.1 A proposed modification to the second paragraph of policy JP-S1 to replace relevant reference to brownfield or previously developed land, to ensure consistency with paragraph 119 and 120 of the National Planning Policy Framework and provide clarity with regard to the policy’s effectiveness is as follows:

In preparing plans, Preference will be given to making as much use as possible of suitable using previously-developed (brownfield) land and vacant buildings to meet development needs.

AP20. In addition to, those set out in PMM2.1, GMCA to prepare main modifications to policy JP-S2 which:

- a) Deletes criterion 4 relating to fossil fuels, with consequential modifications to reasoned justification as necessary.**

PfE Response

- 4.2 At the request of the Inspectors, the proposed modification is to delete JP-S 2 criterion 4 relating to fossil fuels; as a result of it being considered inconsistent with national policy. In addition, matters of mineral extraction, fossil fuels and unconventional gas resources are considered by policies 5 and 6 of the Greater Manchester Joint Minerals Development Plan.

Proposed Modification

- 4.3 The proposed modification is therefore to delete JP-S 2 (4):

~~4. Keeping fossil fuels in the ground;~~

- 4.4 The following consequential modification is proposed to paragraph 5.19 to remove reference to keeping fossil fuels in the ground:

Reasoned Justification (paragraph 5.19)

5.19 Greater Manchester seeks to promote investment in new zero-carbon technologies, to reduce the reliance on carbon based fuels to accelerate the speed at which such new technologies become financially viable and/or technically feasible. ~~Work undertaken by the Tyndall Climate Change Research Centre(29) has shown that the continued extraction of fossil fuels~~

~~will not be compliant with a carbon emissions reduction pathway that is aligned with international commitments within the 'Paris Agreement'. It is therefore considered prudent to not exploit new sources of hydrocarbons and keep fossil fuels in the ground so at this point in time we will not support hydraulic fracturing (fracking).~~

b) Deletes criterion 7 relating to Local Area Energy Plans, with consequential modifications to reasoned justification as necessary.

PfE Response

- 4.5 The nine districts involved in PfE Plan have already developed Local Area Energy Plans (LAEP), as well as Greater Manchester Combined Authority wide Local Area Energy Plan which was published in collaboration with Energy Systems Catapult; these consider how the electricity needs of the city-region can be met. The proposed modification is therefore to delete criterion 7 but retain the reference to the LAEPs in the reasoned justification as a tool being used by districts to better co-ordinate energy across the city-region in strategic plan-making and as part of delivering a carbon neutral Manchester.

Proposed Modification

- 4.6 The proposed modification is to delete policy JP-S 2 (7):

~~7. Development of Local Area Energy plans to develop cost effective pathways to achieve carbon targets;~~

- 4.7 A consequential modification is required to the new paragraph related to LAEPs which is proposed to follow PfE paragraphs 5.9 and 5.10, which is proposed in M6.1 Q4 (para 6.36) to reflect the above:

Reasoned Justification (new paragraph following 5.9 and 5.10)

“Local Area Energy Plans ~~are being~~ have been developed by the PfE districts in collaboration with the GMCA and Energy Systems Catapult (ESC). The Local Area Energy Plans are being funded by BEIS and are consistent with Government policy. They will become a critical evidence base for Local Plans in setting out possible and cost-effective options whilst highlighting where investment is needed and will inform planning decisions. And it is anticipated that Local Plans will further identify geographical locations for such energy assets, as considered necessary/appropriate within individual local planning authority areas.”

c) Modifies criterion 8 to be clear that any of the subsequent requirements will be subject to viability and/or practicability:

PfE Response

- 4.8 The proposed modification to criterion 8 will make it clear that the subsequent requirements set out in this policy will be subject to the test of viability and / or

practicability. This will ensure that the policy is deliverable and consistent with the National Planning Policy Framework chapter 14 and NPPG 007 Reference ID: 10-007-20190509.

Proposed Modification

4.9 The proposed modification to JP-S 2 (8) is as follows:

8. An expectation that new development will, unless it can be demonstrated that it is not practicable or financially viable;

d) Modifies criterion 8a and footnote 31 to provide clarity about the approach to net zero development in the periods 2022-2025, 2025-2028 and 2028 onwards, including any requirements for ‘offsetting’. This will inform our consideration of whether a main modification is necessary.

PfE Response

4.10 To ensure the effectiveness of the approach to net zero development in criterion 8a), a modification is proposed. The phrase “Work toward” is necessary to align the policy more closely with Objective 7 of PfE. An additional sentence to criterion 8a) clarifies that the definition of net zero-carbon applies to reducing greenhouse gas emissions in operation and minimising energy demand from 2025 by following the energy hierarchy. PfE paragraphs 5.10 and 5.11 also provide further clarification on this approach to net zero carbon.

Proposed Modification

4.11 The proposed modification to JP-S 2 8a is as follows:

8a ~~Work toward being~~Be net zero (31) carbon from 2028 ~~by following the energy hierarchy, which means;~~

- i. 2022-2025 - applies to emissions in ‘operation’;
- ii. 2025-2028 - in addition to (i) and unregulated emissions; and
- iii. 2028 onwards - in addition to (i) and (ii), emissions ‘in construction’ should be considered.

~~(w~~With any residual carbon emissions offset) by following the energy hierarchy, which in order of importance seeks to:

4.12 The proposed modification to 8a retains the reference to the potential for any ‘residual’ carbon emissions to be offset from 2025. Further clarification on how carbon emissions might be offset is set out in paragraphs 5.15 and 5.16 of PfE.

- 4.13 As a consequence, it is necessary to modify footnote 31 by highlighting that this trajectory is in line with 2025 Future Homes Standard and removing the text which has been moved into criterion 8a, as follows:

Footnote

Footnote 31: ~~Applied to operational net zero carbon up to 2028 and considered for net zero 'in construction' from 2028 onwards~~ Target trajectory is expected to be in line with 2025 Future Homes Standard; net zero carbon is defined in the UK GBC Framework (<https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/>). ~~Minimum carbon reduction target expected to be in line with 2025 Future Homes Standard of 80%.~~

- 4.14 On reflection and to provide clarity on the matter of carbon off-setting in criterion 8a), a proposed modification is required to update the reasoned justification paragraph 5.16 to set out that the Greater Manchester Environment Fund has now been established; this will provide a potentially suitable mechanism for carbon offset payments, alongside any other approaches developed by the districts. The proposed modification is as follows:

Reasoned Justification (paragraph 5.16)

5.16 By following [...]. The Mayor of Greater Manchester ~~is~~ has developed the Greater Manchester an Environment Fund, which will provide a mechanism for carbon offset payments to be made.

- e) Modifies criterion 8b and/or relevant supporting text to clarify that the expectation for the number of EV charging points to be provided is in line with Part S of the Building Regulations (unless superseded by relevant Local Plan policies).**

PfE Response

- 4.15 In addition to the proposed modifications to clarify the word 'adequate' in policy criterion 8b and to make the reasoned justification clearer (as set out in PMM2.1 and considered in M6.1 Q6.6 and 6.8);

Proposed Modification

- 4.16 The following modification to criterion 8b will reference the Building Regulations as relates to EV charging points:

8b Incorporate adequate electric vehicle charging points, in line with Part S of the Building Regulations, unless superseded by relevant Local Plan policies, to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site;

- 4.17 The consequential modification to the proposed new paragraphs following paragraph 5.19 of PfE (as set out in PMM2.1 and M6.1, Q6.8 paragraphs 6.58 and 6.59) includes the addition of a new second sentence referring to the Building Regulations for clarity and the deletion of the second paragraph and fifth criterion, as follows:

Reasoned Justification

[New Paragraphs following 5.19]

Under amendments to the Building Regulations (~~June 2022~~), 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. New developments will need to meet the requirements set out in Part S of the Building Regulations, unless superseded by relevant Local Plan policies. However, the Building Regulations are limited in scope to the number of EV charge points to be provided.

The Greater Manchester Electric Vehicle Charging Infrastructure (ECVI) Strategy sets out a clear strategy to encourage the expansion of the wider electric vehicle charging network in GM including by setting guidance that goes beyond the requirements within Building Regulations, in relation to nonresidential development.

The provision of adequate electric vehicle charging points in new development also involves a number of considerations including:

- i. The type of development which will influence the EV user profiles, the vehicle dwell times and the charging behaviour all of which will determine the type of points (fast or rapid or a mix of both) and the management arrangements required.
- ii. The physical location and design of EV charge points within a development to ensure that they are sensitively located and do not negatively affect the street scene, pedestrian and cyclist amenity or access, particularly for people with a disability. Design should also consider the needs of disabled EV drivers.
- iii. Potential for EV Car Club requirements which also relates to the type of development and its location.
- iv. The management, operation and maintenance requirements of the charge points (private, workplace or publicly accessible charge points managed, operated and maintained by an EV charge point provider); ~~and~~

~~v. The number of charge points required to meet demand (both current and likely future demand). Meeting current and likely future demand can be achieved through requirements for both active and passive EV charging infrastructure in new development. Active charge points refer to spaces that are fully wired and ready to use from the outset of the development. Passive provision refers to the provision of the necessary underlying infrastructure (power supply capacity and the ducting installed within car parking facilities) to enable simple expansion of charge points in the future, as demand increases~~

f) Modifies criterion 8d to provide clarity on the targets for renewable energy and source heat demand as set out in Table 5.1. GMCA to also consider whether further modifications are needed to Table 5.1 to reflect the proposed deletion of reference to Part L of the Building Regulations in policy JP-S2 and/or whether the targets remain relevant in light of changes to the Building Regulations.

4.18 Further to hearing discussions; it is proposed that for clarity and the effectiveness of criterion 8d that Table 5.1 in paragraph 5.14, which relates to reducing energy demand and on- site renewable energy generation (in residential development), be referred to in criterion 8d.

Proposed Modification

4.19 The following modification is therefore proposed to policy criterion 8d:

8d. In residential developments, Achieve energy demand reductions in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation-, in accordance with Table 5.1.

For clarity and effectiveness of the policy, the consequential modification to the last sentence of criterion 8 is proposed:

~~Districts Local Plans may set out specific carbon emission reduction and energy demand targets within Local Plans. particularly if carbon neutral targets have been set sooner than 2038 or promote other measures through which energy efficiency of buildings and renewable energy generation can be achieved.~~

4.20 With reference to Table 5.1 (paragraph 5.14 of the reasoned justification), it is considered that modifications are required to update the targets for reducing energy demand and on-site renewable energy generation following the update to Part L of Building Regulations in December 2021. The proposed modification is to delete reference to Part L 2013 from the second column of the Table 5.1 and in footnote 26 and replace with reference to updated Building Regulations as follows:

Reasoned Justification**[Paragraph 5.14]***Table 5.1 Targets For Reducing Energy Demand and Onsite Renewable Energy Generation within residential developments.*

	Space Heat Demand²⁶	Hot Water Energy Demand²⁷	Renewable Energy Generation Targets
2021 - 2025	Houses (30kWh/m2) Flats (25kWh/m2)	20% energy demand reduction <u>in the total heat required for water heating</u> (compared to Part L 2013)	*Photovoltaic installation: 20% ground floorspace
2025 - onwards	Houses (20kWh/m2) Flats (15kWh/m2)	^20% energy demand reduction <u>in the total heat required for water heating</u> (compared to Part L 2020)	*Photovoltaic installation: 40% ground floorspace
*Ground floorspace used as a proxy for available roof area.			
^will need to be reviewed with Future Homes Standard 2025 to determine if savings already embedded.			

²⁵ As calculated within SAP 10.2 2012, Space Heating Requirement (Box998-or equivalent at later SAP versions). It does not take into account the efficiency of the space heating system. It is based on a fabric first approach (insulation and airtightness)

²⁶ Reduction in expected DHW grid energy demand compared to the Part L concurrent notional building. Takes into account the efficiency of the domestic hot water generating system, on-site energy generation and direct use, and any other passive hot water energy recovery systems installed, as shown in Calculation Reference 62 in SAP10.2.

AP21. In addition to those set out in PMM2.1, GMCA to prepare main modifications to policy JP-S3 and relevant reasoned justification which:

- a) Modifies criterion 2 to include reference to criteria a – f being ‘subject to viability and practicability’, with consequential amendments to criteria a, b and d. This should include clarification that connection to networks is expected where criteria are met.**

PfE Response

4.21 The following modifications to Policy JP-S 3 Criterion 2 have been proposed in order to make the Policy effective in line with NPPF paragraph 35c and are as set out below. The proposed modification make clear that Criteria 2a to 2f will be subject to practicability and viability considerations, consistent with the approach set out in NPPF para 157a and to clarify that connection to networks is expected where criteria are met and to seek to remove unnecessary duplication in order to align with NPPF paragraph 16.

2. Within the identified “Heat and Energy Network Opportunity Areas”, unless it can be demonstrated that there are more effective alternatives for minimising carbon emissions or such connection is not practicable or financially unviable, there will be it is expected that:

- a. ~~A requirement that n~~ New residential developments that are '10 dwellings or more' or other developments over 1,000 m2 floorspace shall ~~should evaluate the viability of:~~
 - i. ~~Connecting to an existing or planned heat/energy network or be designed to enable future connection (where within 500m of such a network) has been identified within the Heat Network Opportunity Areas); and/or~~
 - ii. ~~Installing a site-wide or communal heat/energy network solution.~~
- ~~b. A requirement, where unviable to connect to an existing network or install a site-wide or communal heat/energy network, for new development to incorporate appropriate capability to enable future connection (e.g. adequate space in plant room for plate heat exchangers, capped off flow/return connections);–~~
- c. (See response below to AP.21b)
- d. An expectation that new industrial development will demonstrate that opportunities for using waste heat locally have been fully examined, and included in proposals ~~unless proven to not be viable;~~

b) Deletes criterion 2c relating to the ‘presumption in favour’ of connection.

PfE Response

- 4.22 In order to make the policy clear, unambiguous and effective in line with NPPF paragraphs 16 and 35c it is proposed that Policy JP-S 3 Criterion 2c, which sets out a 'presumption in favour', and accompanying Footnote 41 be deleted. To note the deletion of Footnote 41 supersedes the proposed modification set out in GMCAs response to M6.1 Q6.10d (Page 22, paragraph 6.71):

~~c. A 'presumption in favour (41) of network connection' where new residential developments over 10 dwellings and other developments over 1,000 sq m floorspace are within 500m of an existing heat network, or where a network is being delivered;—~~

~~41. Ministry of Housing, Communities and Local Government, National Planning Policy Framework, (2021), Paragraph 11~~

c) Deletes criterion 3 and moves the criteria relating to heat/energy network assessments to reasoned justification.

GMCA Response

- 4.23 The purpose of Policy JP-S 3 Criterion 3a to g was to ensure a common understanding and consistent approach in the production of heat/energy network assessments across all PfE districts where relevant criteria in the policy are met. The provision of a standard set of assessment criteria was also intended to assist both the developer and decision maker by setting out the evidence required to support future applications on a cross boundary issue. However, on reflection, Criterion 3a to g should be considered as guidance regarding the interpretation of the policy and therefore is proposed to be deleted from the body of policy and instead be incorporated into the associated reasoned justification.
- 4.24 Furthermore, to ensure the policy is effective, clear and unambiguous in line with NPPF paragraphs 16 and 35c) it is proposed that supplementary main modifications be made to the proposed new paragraph (M6.1, Q6.1, pages 23-24, paragraphs 6.76-6.78). These modifications remove the word 'viability' in order to elucidate that this is not a financial assessment and also to clarify that decentralised heat/energy network assessments should form part of an energy statement in support of future planning applications.

Proposed Modification

- 4.25 To delete Policy JP-S 3 Criterion 3:

~~3. In support of the above, all decentralised heat/energy network viability assessments are required to demonstrate consideration and analysis of:~~

- ~~a. Identification of existing and proposed heat/energy loads;~~
- ~~b. Identification of heat/energy supply sources;~~
- ~~c. Identification of opportunities to utilise renewable and low carbon energy sources;~~
- ~~d. Identification of opportunities to utilise waste and secondary heat sources;~~

- ~~e. Impact of proposals and technology choices on local air quality;~~
- ~~f. Design according to national best practice in relation to efficient heat network design (e.g. CIBSE CP1 Heat Networks: Code of Practice for the UK (42), or equivalent); and~~
- ~~g. Adopting appropriate consumer protection standards (e.g. Heat Trust (43), or equivalent).~~

Proposed Modification

4.26 Insert new paragraph after 5.23 in the reasoned justification:

~~To comply with criteria 3 of Policy JP-S 3, heat and energy network viability assessments will be required as part of an energy statement to support with planning applications for new developments within the identified “Heat and Energy Network Opportunity Areas” to demonstrate compliance with PfE energy policies. Policy JP-S3 criteria 3 a-g sets out the content of heat network viability assessments required t~~
To ensure consistency of approach and to aid the decision-making process decentralised heat/energy network assessments are required to demonstrate consideration and analysis of:

- a. Identification of existing and proposed heat/energy loads;
- b. Identification of heat/energy supply sources;
- c. Identification of opportunities to utilise renewable and low carbon energy sources;
- d. Identification of opportunities to utilise waste and secondary heat sources;
- e. Impact of proposals and technology choices on local air quality;
- f. Design according to national best practice in relation to efficient heat network design (e.g. CIBSE CP1 Heat Networks: Code of Practice for the UK (42), or equivalent); and
- g. Adopting appropriate consumer protection standards (e.g. Heat Trust (43), or equivalent).

d) Modifies Figure 5.1 to identify proposed allocations as heat and energy network opportunity areas.

PfE Response

4.27 In order for Policy JP-S 3 Criterion 1 to be clear, unambiguous and effective in line with NPPF paras 16 and 35c) it is proposed that main modifications be made to Figure 5.1 Heat and Energy Network Opportunity Areas, to identify ‘Proposed Allocations 2021’ as Heat and Energy Network Opportunity Areas (identified in red in the Legend) in accordance with Criterion 1d.

Proposed Modification

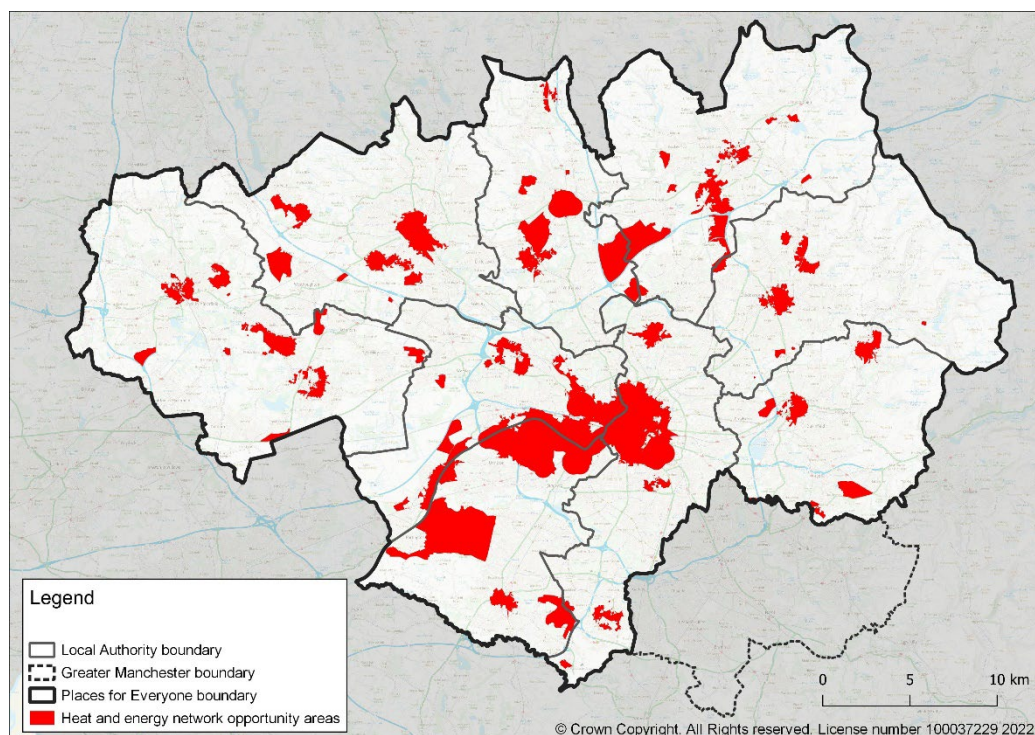


Figure 5.1 Heat and Energy Network Opportunity Areas

Consequential Main Modifications

4.28 Proposed modification to the key of Figure 5.1 as follows:

Legend
 Places for Everyone Boundary
 Local Authority Boundary
 Greater Manchester Boundary
 Heat and Energy Network Opportunity Areas
~~Proposed Allocations 2021~~

AP22. GMCA to prepare main modifications deleting policy JP-S4 and associated reasoned justification. In addition, GMCA to draft consequential main modifications to illustrate how criteria 1, 3 and 13 would be incorporated into policies JP-P1 and JP-D1.

PfE Response

4.29 Policy JP-S 4 Resilience gathered together key strategic themes on climate change, air quality, flood management, green infrastructure, economic development, housing, education, skills and health as well as identifying cross boundary policy to reduce crime, risks and hazards from across PfE. However, on reflection, Policy JP-S 4 criterion are considered to be either

repeated, their content covered in more detail in thematic policies elsewhere in the Plan or not necessary as they are appropriately considered in national policy.

- 4.30 Consequently, in order for PfE to comply with NPPF para 16 it is proposed that JP-S 4 is deleted in its entirety. This will ensure that policies in the Plan are clearly written and unambiguous and avoid unnecessary duplication with the exception of Criterion 1 that it is proposed is incorporated into Policy JP-P 1 at Criterion 8 as a main modification.

- 4.31 The following table sets out the justification for the deletion of Policy JP-S 4 Resilience:

JP-S 4 Resilience Criterion	Justification for Main Modifications (MM)	Main Modification
1	Content partly covered in: JP-P 1 Sustainable Places	Delete Criterion 1 and modify Policy JP-P 1 Sustainable Places Criterion 8
2	Duplicated in: JP-S 2 Carbon and Energy Criterion 2	Delete Criterion 2
3	Content covered in: JP-P 1 Sustainable Places Criterion 4	Delete Criterion 3
4	Content covered in: - JP-S 2 Carbon and Energy Criterion 1; - JP-S 7 Resource Efficiency Criterion 4; and - JP-P 1 Sustainable Places Criterion 5	Delete Criterion 4
5	Duplicated in: Policy JP-P 1 Sustainable Places Criterion 8	Delete Criterion 5
6	Content covered in: - JP-S 6 Clean Air Criterion 8; - JP-P 1 Sustainable Places Criteria 15; and - JP-C 1 An Integrated Network Criterion 1	Delete Criterion 6
7	Content covered in:	Delete Criterion 7

	• JP-Start 13 Strategic Green Infrastructure; • JP-S 6 Clean Air Criterion 10; • JP-G 2 Green Infrastructure Network; • JP-G 6 Urban Green Space; • JP-G 8 Standards for Greener Places; • JP-G 9 A Net Enhancement of Biodiversity and Geodiversity; and • JP-C 5 Walking and Cycling Criterion 6.	
8	Content covered in: • JP-S 5 Flood Risk and the Water Environment Criterion 1; • JP-G 3 River Valleys and Waterways Criterion 5; and • JP-G 5 Uplands Criterion 5	Delete Criterion 8
9	Content covered in: • JP-J 1 Supporting Long Term Economic Growth, Criteria A; • JP-P 2 Employment Sites and Premises; • JP-J 3 Office Development; and • JP-P 4 Industry and Wear-housing Development.	Delete Criterion 9
10	Content covered in: • JP-H 2 Affordability of New Housing Criterion 2	Delete Criterion 10
11	Content covered in: • JP-P 1 Sustainable Places Criterion 17; and • JP-P 5 Education, Skills and Training	Delete Criterion 11
12	Content covered in:	Delete Criterion 12

	• JP-Strat 5 Inner Areas; • JP-Strat 13 Strategic Green Infrastructure; • JP-Strat 14 A sustainable and Integrated Transport Network; • JP-S 6 Clean Air; • JP-G 2 Green Infrastructure Network; • JP-G 5 Uplands, Criterion 6; • JP-G 7 Trees and Woodland, Criterion 10; • JP-P 1 Sustainable Places, Criterion 17; and • JP-P 6 Health.	
13	Content duplicated: • NPPF paragraph 45 • NPPG Hazardous substances (Paragraph: 002 Reference ID: 39-002-20161209).	Delete Criterion 13

Proposed Modification

4.32 The proposed modification to incorporate Policy JP-S 4 Resilience Criterion 1 into Policy JP-P 1 Sustainable Places Criterion 8 is as follows:

'8. Safe, including by designing out crime and terrorism, and reducing opportunities for anti-social behaviour' and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster.

Although it was discussed that Policy JP-S 4 Criterion 3 and 13 could potentially be incorporated into Policy JP-D 1 Criterion 7 during the PfE Hearing on Tuesday 29 November 2022, this is not considered, on reflection, to be required. The content of Criterion 3 (Locating critical infrastructure and vulnerable uses away from locations at a high risk of acute shocks) is considered to be broadly consistent with Policy JP-P 1 Criterion '4 (Resilient, capable of dealing with major environmental and economic events) and therefore its incorporation into Policy P-D 1 is unnecessary.

Whilst the content of Criterion 13 is not repeated in policy elsewhere in the Plan; control over the location of hazardous installations, and new development that could be adversely affected by them, is set out in national legislation (Planning (Control of Hazardous Substances) Regulation 15), national policy (NPPF, paragraph 45 in particular) and planning practice

guidance (NPPG Hazardous substances, paragraph: 002 Reference ID: 39-002-20161209). The Greater Manchester Resilience Strategy (Accessible Version, page 70) and Greater Manchester Community Risk Register (pages 26, 28-29) also identifies processes and tools to reduce risk of disasters and crises that could be incorporated in to district local plans where relevant. Therefore, in order to avoid duplication of legislation, national planning policy and national planning guidance in line with NPPF para 16, Policy JP-S 4 Criterion 13 incorporation into Policy P-D 1 is considered unnecessary.

In addition, as much of the content of Policy JP-S 4 Resilience is covered by Policy JP-P 1 Sustainable Places it would appear appropriate for the reasoned justification for Policy JP-S 4 Resilience (pages 91-92, paragraphs 5.24 to 5.28) to be inserted between paragraphs 9.9 and 9.10 of the reasoned justification for Sustainable Places. This will ensure that the broad ambition for Greater Manchester to be one of the most resilient cities in the world is captured, and that the links between resilience and delivering sustainable places are made.

Proposed Modification

Para 9.9 ‘.....Achieving all of this will help to ensure that all places are characterised by empowered and informed residents, workers and visitors, with a sense of ownership and high levels of societal participation and social interaction.’

(para 5.24) Greater Manchester aims to be one of the most resilient places in the world.

(para 5.25) A key part of achieving sustainable development is ensuring resilience, making sure that our places maintain capacity to function, so that the people living and working here survive and thrive no matter what stresses or shocks they encounter. A significant challenge within this is the ability to respond to future impacts from climate change.

(para 5.26) Greater Manchester is part of the Rockefeller Foundation’s 100 Resilient Cities programme (100RC)(44), which aims to help cities become more resilient to potential challenges. Greater Manchester has produced a Resilience Strategy as part of this programme. The ten districts have also signed up to the United Nations’ Making Cities Resilient Campaign, which aims to reduce disaster risk.

(para 5.27) The need to plan to reduce chronic stresses as well as minimise the impact of acute shocks means that planning for resilience has to be all-embracing, and so many elements of this plan have a role to play.

(para 5.28) The Greater Manchester Community Risk Register(45) and work under the 100RC programme identify that river and surface water flooding, hazardous materials accidents, terrorism, and disease outbreaks are some of the most significant resilience challenges faced. The way in which Greater Manchester develops will have a significant impact on future levels of risk and

vulnerability, and the ability of people and places to recover from acute shocks.

Para 9.10 'High quality design will be fundamental to achieving all of this, helping to ensure that Greater Manchester can deliver the attractive places that will enable it to compete successfully with other major cities across the world....'

Proposed Modification:

4.33 Deletion of reference to JP-S 4 Resilience from paragraph 5.7, bullet point 3

- ~~Measures that will be taken to future proof the city region to mitigate environmental challenges, including climate change Policy JP-S 4 'Resilience';~~

AP23. In addition to those proposed in PMM2.1, GMCA to prepare main modifications to policy JP-S5 which:

a) Modifies the opening paragraph and criterion 1 to clarify the role of the North West Basin Management Plan.

PfE Response

4.34 We propose to retract our proposed modification to the policy that was in our answer to PQ78 (GMCA5.1) to insert the words 'development management' into the opening paragraph because taking a catchment-based approach to protect the quantity and quality of water bodies will be implemented through district local plans as well as development management.

4.35 We also propose moving the reference to the North West River Basin Management Plan from criterion 1 to the opening paragraph of the JP-S5 because many of the policy's criteria help to deliver the measures within the North West River Basin Management Plan to achieve the objectives of the Water Framework Directive, not just criterion 1.

4.36 As such, the additional proposed modifications to the opening paragraph and criterion 1 of JP-S5 are as follows:

~~Through development management an~~ An integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by:

1. ~~Returning rivers to a more natural state, where practicable, in line with the North West River Basin Management Plan;~~

b) Provides clarity about the circumstances in which exceptions to the requirements of criterion 4 would apply.

PfE Response

4.37 We propose modifications to JP-S5 and paragraph 5.36 of the reasoned justification to clarify that achieving greenfield run-off rates might not be practicable in all circumstances due to site conditions and the type of development proposed, such as on small and/or constrained previously developed sites and the conversion of existing buildings. We have also clarified that district local plans should consider setting more detailed surface water drainage policies, including alternative surface water discharge rates, to reflect local circumstances and evidence, particularly in relation to areas that have critical drainage issues.

4.38 Proposed modifications to JP-S5 criterion 4:

4. Expecting developments to manage surface water runoff through sustainable drainage systems and as close to source as possible ~~(unless demonstrably inappropriate) so as to not exceed.~~ Development should aim to achieve greenfield run-off rates unless it is demonstrated to be impracticable. District local plans should consider setting more detailed surface water drainage policies to reflect local circumstances, including or alternative surface water discharge rates specified in district local plans, such as in areas these identified for areas with critical drainage issues.

4.39 Proposed modifications to paragraph 5.36 of the reasoned justification by adding the following two sentences to the end of the paragraph:

Development proposals should aim to get as close to greenfield run-off rates as possible, depending on site conditions. Alternative surface water discharge rates can be set out in district local plans to reflect local circumstances and evidence.

c) Provides clarity within criterion 8 about the standards development is expected to achieve in terms of water efficiency.

PfE Response

4.40 A proposed modification to criterion 8 of the JP-S5 is set out below to clarify the water efficiency standards that development is expected to achieve:

8. As a minimum, residential development should meet the mandatory water efficiency standard of 125 litres/person/day as set out in Building Regulations. District local plans may and should consider setting a tighter water efficiency standard of 110 litres/person/day where there is a clear local need with reference to national guidance on housing optional technical standards. ~~Conserving water and maximising water efficiency in new development~~

AP24. In addition to changes in PMM2.1, GMCA to prepare main modifications to policy JP-S6 which:

a) Modifies criterion 2 to make it clear applications will be determined ‘having regard’ to the IAQM and EPUK Guidance.

PfE Response

4.41 A proposed modification to criterion 2 of the JP-S6 is set out below to clarify applications will be determined ‘having regard’ to the IAQM and EPUK Guidance.

2. Determining planning applications ~~in accordance with~~ having regard to the most recent development and planning control guidance published jointly by the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), and the most recent IAQM Guidance on the Assessment of Dust from Demolition and Construction, or relevant successor guidance, including the requirement for developers to submit construction management plans as appropriate;

b) Modifies criterion 3 so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided.

PfE Response

4.42 A proposed modification to criterion 3 of the JP-S6 is set out below to clarify that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided.

3. Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data so that adverse impacts on air quality can be fully assessed and development only permitted where they are acceptable and/or suitable mitigation can be provided; ~~and, if approved, to make appropriate provision for future monitoring of air pollution;~~

c) Modifies criterion 5 and/or relevant reasoned justification to clarify that this criterion relates to support being given to proposals for commercial EV charging infrastructure and is separate to matters considered under JP-S2.

PfE Response

4.43 Proposed Modifications are set out below to to JP-S6 criterion 5 and paragraph 5.49 of the reasoned justification to clarify that this criterion relates to support being given to proposals for commercial EV charging infrastructure.

4.44 Proposed modifications to JP-S6 criterion 5:

5. Significantly expanding the existing commercial network of electric vehicle charging points, both for public and private use, including as part of new developments;

Proposed modifications to paragraph 5.49 of the reasoned justification by adding the following two sentences:

It is clear that a wide range of actions will be required to improve air quality to appropriate levels, ~~in addition to the CAZ~~, and support objectives relating to climate change, Greater Manchester's 2038 carbon neutrality target, population health and quality places. Many of these actions are beyond the scope of this plan, but the primary focus will need to be on transport given its primary contribution to air pollution. Significantly expanding the existing network of publicly accessible EV charging infrastructure will be important to encourage and expediate the transition from petrol and diesel engine vehicles to EVs. Therefore, opportunities to support proposals for commercial EV charging infrastructure should be supported where appropriate. ~~Hence,~~ Regard should also be had to transport-related policies elsewhere in this plan and in the Greater Manchester Transport Strategy 2040 refresh and Our Five Year Transport Delivery Plan. The most significant role which this Plan will play in this respect is to locate development in the most sustainable locations which reduce the need for car travel, for example by maximising residential densities around transport hubs.

d) Modifies criterion 9 to clarify that there may be other areas that are particularly sensitive to air quality other than schools and early years sites.

PfE Response

- 4.45 A proposed modification to criterion 9 of the JP-S6 is set out below to clarify that the criterion also applies to other locations that are particularly sensitive to air quality.

9. Controlling traffic and parking within and around schools, ~~and~~ early years sites and other locations that are particularly sensitive to air quality;

e) Consider whether modifications are necessary to paragraph 5.44 to ensure accuracy.

PfE Response

- 4.46 The World Health Organisation air quality guidelines were updated in Sept 2021 in response to the real and continued threat of air pollution to public health. The WHO Air quality guidelines recommend levels and interim targets for PM2.5 were reduced from 10 µg/m³ annual mean to 5 µg/m³ annual

mean. In light of the September 2021 update of a proposed modification to paragraph 5.44 of the reasoned justification is set out below.

Greater Manchester has also signed up to achieve WHO 'BreatheLife City' status by 2030, which means achieving WHO targets for PM (PM_{2.5} must not exceed 540 µg/m³ annual mean) and other air pollutants by this date. Regardless of targets, there is no clear evidence of a safe level of exposure below which there is no risk of adverse health effects. As such, policy ambitions should always be to reduce air pollution to as low as possible as further reduction of PM or NO₂ concentrations below air quality targets/standards are likely to bring additional health benefits.

M7. Places for Jobs

AP25. GMCA to prepare main modifications deleting parts Gi-viii of policy JP-J1 and replacing with cross reference to policies JP-Strat1-12, as set out in GMCA16.

PfE Response

5.1 To ensure consistency with JP-Strat 1 to JP-Strat 12 and to remove ambiguity, the following modification is proposed to point G of JP-J1 as follows:

G. Maximising the potential of the key growth locations set out in JP-Strat 1 to JP-Strat 12 whilst also securing investment that raises the competitiveness of our northern boroughs to deliver inclusive growth across the sub-region by ensuring that employment growth opportunities are well connected and accessible to all residents. ~~Key locations that will help to maximise economic growth in an inclusive way include:.....’.~~

- i. ~~The expanding City Centre, which will be further strengthened as the most significant economic location in the UK outside London, providing a high concentration of jobs that are highly accessible from across Greater Manchester and beyond. The city centre includes the Oxford Road corridor which will continue to develop as a world-class innovation hub with a very high concentration of research activity and enhanced business connections~~
- ii. ~~The Quays, delivering sustained growth as a major business location including an internationally important digital and creative cluster~~
- iii. ~~The Core Growth Area wider area of economic activity at the heart of Greater Manchester, stretching from the Etihad Campus in the east, through the City Centre and The Quays, to Trafford Park and the Trafford Centre, providing which provides an enormous and extremely diverse range of businesses and jobs (currently accounting for around one-quarter of employment in Greater Manchester, with this proportion expected to grow), and with key clusters of growth sectors~~
- iv. ~~Manchester Airport Enterprise Zone, with the expansion of the airport as the UK’s primary international gateway outside~~

~~London and the South East providing easy business connectivity across the world, and increased employment activity around the airport, Wythenshawe Hospital/Medipark, and the proposed HS2 station~~

- ~~v. The seven main town centres (Altrincham, Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale and Wigan), providing a stronger focus for local economic activity, and exploiting important advantages such as the direct mainline rail links to London from Stockport and Wigan, HS2 and the university in Bolton~~
- ~~vi. Port Salford, providing sustainable freight connections by water and rail and acting as an international gateway via facilities at the Port of Liverpool that are capable of accommodating ships larger than those which can be accommodated by the Panama Canal – "Post Panamax"~~
- ~~vii. Northern Gateway, with a massive expansion of the existing employment areas forming a major facility similar in size to Trafford Park, helping to deliver a better distribution of growth across Greater Manchester and boosting the economy of the northern part of the city-region~~
- ~~viii. M6 logistics hub in Wigan, extending into Warrington, St Helens and West Lancashire, providing a major cluster of warehousing and distribution activity along the M6 corridor with easy access to the Port of Liverpool via the M58~~
- ix. New Carrington, delivering a significant mixed-use development accommodating major new employment floorspace on predominantly brownfield land. This will create a sustainable neighbourhood linking to the existing deprived communities in Carrington, Partington and Sale West, providing jobs as well as improved transport, social and green infrastructure.

AP26. GMCA to prepare main modifications to the third paragraph of policy JP-J2 to delete references to the examples of Tame Valley, Trafford Park and Trafford Park Freight Terminal.

PfE Response

- 5.2 To remove potential ambiguity within the policy, modifications are proposed to the third paragraph of JP-J2 and to paragraph 6.36 as follows:

JP-J2:

Existing employment areas that are important to maintaining a strong and diverse supply of sites and premises in our boroughs will be protected from redevelopment to other uses, nurtured to ensure they remain competitive and their accessibility improved where necessary. This will include local employment areas as well as strategic locations, ~~such as the Tame Valley and the core of Trafford Park, and associated transport infrastructure such as the Trafford Park Freight Terminal.~~

Paragraph 6.17

A good combination of existing strategic sites, such as Trafford Park, small scale sites and new sites and premises will therefore be required.

Paragraph 6.36:

The lowest level of new supply is in Tameside, where there will be a greater reliance on existing sites and premises, such as in the strategically important, Tame Valley, which will need to be protected accordingly.

AP27. GMCA to prepare potential main modifications to policies JP-J3 and JP-J4 which sets out how the district employment floorspace calculations suggested in GMCA15 would be implemented, including any guidance for local authorities on how the data should be used in the preparation of local plans. This will inform our consideration of whether a main modification is necessary.

PfE Response

- 5.3 In order to provide an appropriate framework for Local Plans, it is considered that a district requirement for employment floorspace is required and should be set out in the Plan, similar to that for housing. GMCA 15 sets out the proposed methodology for calculating the office and industry and warehousing minimum district requirements. In response to AP27, the proposed modifications that would be needed to JP-J3 and JP-J4, to provide a minimum district employment requirement are set out below. The basis for these requirements is the 2022 land supply and a proposed plan period of 2022-2039.
- 5.4 A total industry and warehousing land supply of 4,100,571 sqm has been identified in the plan area, which provides an approximate 14% flexibility allowance on the industry and warehousing requirement of 3,538,000 sqm. The industry and warehousing requirements are informed by each districts

land supply position and therefore any change to this supply identified through the examination of this Plan would necessitate a change to the figures in Table 6.3, to provide an effective planning policy from which Local Plans can follow and planning decisions can be made. As minimum requirement figures, taken together with the ample flexibility allowance, already identified across the Plan area, additional employment land is not envisaged to be required.

- 5.5 In the event that subsequent district local plans have plan periods that extend beyond 2039, it is not possible to simply roll forward the employment land requirements from the PfE plan which means that the PfE cannot provide district employment land targets for year 2039 / 2040 and beyond. Therefore, a modification is proposed to the reasoned justification to explain this.

JP-J3 Office Development

At least ~~4,900,000~~ 2,019,000 sqm of accessible new office floorspace will be provided in the Plan area over the period ~~2024-2037~~ 2022-2039, with a focus on:

1. The City Centre, accounting for more than half of all new office floorspace in the sub-region and taking advantage of existing and proposed public transport connectivity, including the proposed new HS2 and Northern Powerhouse Rail links which will further enhance its position as the premier office location outside London
2. The Quays, significantly expanding this distinctive office location and the continued growth of the nationally significant MediaCityUK
3. Manchester Airport ~~Enterprise Zone~~ and its environs, taking advantage of the extensive international connections, public transport accessibility, and proposed HS2 and Northern Powerhouse Rail links
4. Town centres, offering a strong local profile and lower cost options with excellent public transport connections and access to services, with opportunities being sought to significantly increase the supply of new office floorspace beyond that currently identified especially in the northern parts of Greater Manchester.

The refurbishment of existing office accommodation will be encouraged including improving standards of accessibility.

~~Individual districts through Local Plans or other mechanism(s) may restrict the changes of use of existing office space to non-employment uses such as housing where this could compromise the continued supply of a diverse range of office floorspace.~~

Each district will contribute to providing the overall minimum requirement for office development as set out in table 6.1.

Reasoned Justification

[New paragraphs at the beginning of the policy reasoned justification, before existing paragraph 6.23]

Office Requirement

To ensure the required provision of accessible new office floorspace over the plan area, each district should deliver their portion of the overall requirement of 2,019,000 sqm over the period of 2022-2039. Individual district minimum requirements for office floorspace provision have been identified in table 6.1.

District	Total Office Supply 2022-2039 (sqm)	Minimum District Office Floorspace Requirement (sqm)
Bolton	70,739	49,588
Bury	1,177	825
Manchester	2,069,735	1,450,895
Oldham	81,998	57,481
Rochdale	101,002	70,803
Salford	309,102	216,682
Tameside	20,680	14,497
Trafford	223,661	156,788
Wigan	2,055	1,441
Places for Everyone	2,880,150	2,019,000

Table 6.1 Minimum District Office Floorspace Requirement for 2022-2039

The district minimum requirement for office floorspace will assist in the delivery and monitoring of JP-J3 and inform relevant local plan policies. The minimum district requirements will be used to inform Local Plan policy preparation to deliver their portion of the overall office floorspace requirement. In ensuring the delivery of their minimum district requirement over the plan period, district Local Plans may consider introducing policies which set out phasing of the office floorspace requirement over the plan period, should it be considered necessary.

In the event that subsequent district local plans have plan periods that extend beyond 2039, it is not possible to simply roll forward the employment land requirements from the PfE plan which means that the PfE cannot provide district employment land targets for year 2039 / 2040 and beyond. Therefore, if a local plan has a plan period beyond 2039 the plan-making authority will have to consider on the basis of evidence whether to make provision for

additional employment land allocations in respect of plan period years beyond 2039.

Office Supply [new heading]

Renumber table 6.1 (existing supply table) as table 6.2.

JP-J 4 Industry and Warehousing Development

At least ~~3,330,000~~ 3,538,000 sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period ~~2021-2037~~ 2022-2039.

To achieve this, a high level of choice and flexibility will be provided in the supply of sites for new industrial and warehousing floorspace., ~~with a focus on:~~

- ~~1. Offering a range of opportunities~~
- ~~2. Making the most of the key locations identified in Policy JP-J 1 'Supporting Long-Term Economic Growth'~~
- ~~3. Significantly increasing the supply of high-quality sites across the northern parts of Greater Manchester to help increase the competitiveness of that area, including a major strategic opportunity at Northern Gateway~~

~~Individual sites providing more than 100,000 sqm of industrial and warehousing floorspace should, where there is likely to be demand and it is appropriate to the location, incorporate:~~

- ~~A. Opportunities for manufacturing businesses, particularly advanced manufacturing;~~
- ~~B. Units capable of accommodating small and medium-sized enterprises;~~
- ~~C. Overnight parking for heavy goods vehicles; and~~
- ~~D. Promote and support access by sustainable modes of transport~~

Each district will contribute to providing the overall minimum requirement for industry and warehousing development as set out in table 6.3.

Reasoned Justification

[New paragraphs at the beginning of the policy reasoned justification, before existing paragraph 6.31]

Industry and Warehousing Requirement

To ensure the required provision of new, accessible, industry and warehousing floorspace over the plan area, each district should deliver their portion of the overall requirement of 3,538,000 sqm over the period of 2022-2039. Individual district minimum requirements for industry and warehousing floorspace provision have been identified in table 6.3.

District	Total Supply 2022-39 (sqm)	Minimum District Industry and Warehousing Requirement (sqm)
Bolton	705,861	609,022
Bury	608,584	525,090
Manchester	75,693	65,308
Oldham	278,922	240,656
Rochdale	584,883	504,641
Salford	548,316	473,091
Tameside	274,072	236,471
Trafford	543,919	469,297
Wigan	480,321	414,424
Places for Everyone	4,100,571	3,538,000

Table 6.3 Minimum District Industrial and Warehousing Floorspace
Requirement for 2022-2039

The district minimum requirement for industry and warehousing floorspace will assist in the delivery and monitoring of JP-J4 and inform relevant local plan policies. The minimum district requirements will be used to inform Local Plan policy preparation to deliver their portion of the overall industry and warehousing floorspace requirement. In ensuring the delivery of their minimum district requirement over the plan period, district Local Plans may consider introducing policies which set out phasing of the industry and warehousing requirement over the plan period, should it be considered necessary.

In the event that subsequent district local plans have plan periods that extend beyond 2039, it is not possible to simply roll forward the employment land requirements from the PfE plan which means that the PfE cannot provide district employment land targets for year 2039 / 2040 and beyond. Therefore, if a local plan has a plan period beyond 2039 the plan-making authority will have to consider on the basis of evidence whether to make provision for additional employment land allocations in respect of plan period years beyond 2039.

Industry and Warehousing Supply [new heading]

Renumber table 6.2 (existing supply table) as table 6.4.

AP28. GMCA to prepare main modifications to delete the final paragraph of policy JP-J3 as set out in GMCA16.

PfE Response

5.6 To make the policy justified and consistent with national policy we are proposing a modification to delete the final paragraph of JP-J3 and part of paragraph 6.22 in the Reasoned Justification, district's Local Plans can still look at restricting the change of use of existing office space without this paragraph, should there be an evidence-based need. Modifications as follows:

6.22 Existing office floorspace will continue to have an essential role in meeting the needs of our businesses, often providing a lower cost alternative to new premises, especially for start-ups and smaller businesses. ~~The conversion of offices to housing can be an important source of supply of new homes, but this must not be allowed to compromise our economic growth and diversity, and consequently there may need to be restrictions on the loss of office floorspace particularly in key locations.~~

Policy JP-J3 Office Development

The refurbishment of existing office accommodation will be encouraged including improving standards of accessibility.

~~Individual districts through Local Plans or other mechanism(s) may restrict the changes of use of existing office space to non-employment uses such as housing where this could compromise the continued supply of a diverse range of office floorspace.~~

AP29. In addition to main modifications put forward under GMCA16, GMCA to prepare main modifications which would delete any requirements relating to HGV parking from policy JP-J4 and insert them into policy JP-C6. Given proposed main modifications to policy JP-J1, the GMCA should also consider the need for criteria 1-3 and/or how the references could be rationalised.

PfE Response

5.7 In order to rationalise the policy, avoid repetition and potential ambiguity in the plan and ensure the policy is justified, modifications to JP-J4 are proposed. Criteria 1 to 3 are considered to be adequately dealt with elsewhere in the plan: Criterion 1 within JP-J1; Criterion 2 within JP - Strat 1 to JP – Strat 12 and; Criterion 3 is within JP- Strat 6.

5.8 Criteria A – D are proposed to be deleted. On reflection it is considered that Criteria A and B are not fully justified, whilst criterion C would be more appropriately located within JP-C6 (see proposed modification below). Criterion D is adequately covered by JP-C7.

5.9 Consequently, the following modifications are proposed to JP-J4, paragraphs 2 and 4 and also to JP-C6:

To achieve this, a high level of choice and flexibility will be provided in the supply of sites for new industrial and warehousing floorspace, ~~with a focus on:~~

- ~~1. Offering a range of opportunities~~
- ~~2. Making the most of the key locations identified in Policy JP-J 1 'Supporting Long Term Economic Growth'~~
- ~~3. Significantly increasing the supply of high quality sites across the northern parts of Greater Manchester to help increase the competitiveness of that area, including a major strategic opportunity at Northern Gateway~~

~~Individual sites providing more than 100,000 sqm of industrial and warehousing floorspace should, where there is likely to be demand and it is appropriate to the location, incorporate:~~

- ~~A. Opportunities for manufacturing businesses, particularly advanced manufacturing;~~
- ~~B. Units capable of accommodating small and medium sized enterprises;~~
- ~~C. Overnight parking for heavy goods vehicles; and~~
- ~~D. Promote and support access by sustainable modes of transport~~

~~4. Providing for overnight parking for heavy goods vehicles, where there is likely to be demand, and it is appropriate to the location; and~~

~~5. Promoting and supporting access by sustainable modes of transport.~~

5.10 Modification to JP-C6 bullet point 6:

6. Providing for overnight parking, with appropriate facilities, for heavy goods vehicles, where there is likely to be demand, and it is appropriate to the location.

M9. Issue 9.1 Habitat Regulations Assessment

AP30. GMCA to prepare additional main modifications to policy JP-G5 and reasoned justification to describe the impact of recreational disturbance on the relevant SAC/SPAs, and to clarify the role of the SPD and SANGs and SAMMS. Where known, this should address any need for on-site requirements, contributions, and how the different approaches to the zones will be addressed (400m, 2.5km and 7km). Reference should be made to the three districts affected (Oldham, Rochdale and Tameside).

PfE Response

6.1 To address the issues raised in AP30, we propose to modify JP-G5 and the reasoned justification by:

- retracting our modification to paragraph 8.33 of the reasoned justification that we proposed in our response to Q9.5 (Examination Document M9.1) and replacing it with four new paragraphs to: explain the recreation disturbance impact on the South Pennine Moors SAC/SPAs; explain the approach taken to mitigate the impact in the three zones; make reference to the districts of Rochdale, Oldham and Tameside; and to clarify the role of the SPD.
- Deleting part of the text in the new criterion 7 to JP-G5 that we also proposed in our response to Q9.5 and replacing it with additional text to set out the approach to mitigation in the three impact zones.

6.2 The proposed modifications to paragraph 8.33 are set out as follows:

8.33 The importance of the mosaic of moorland habitats is reflected in a range of international, national and local designations, including parts of the large South Pennine Moors Special Area of Conservation and Special Protection Area. These habitats support important breeding bird populations, ~~and it is important the new nearby development does not have an adverse impact through domestic features, disturbances, recreation and loss/disturbance to functionally linked habitats.~~

The HRA indicates that in the first instance new development should be avoided within 400m of the SAC and SPAs boundaries to limit the risk of urban edge effects which include: fly tipping, dumping of garden waste and resultant introduction of invasive/ alien plants; off-road vehicles leading to track erosion; disturbance to grazing livestock; increased incidence of wildfire; and predation from domestic pets and urban scavengers.

Within 2.5km of the SPAs boundary new development should avoid and/or mitigate loss or disturbance to foraging habitats. Qualifying bird species of the SPAs can travel as far as 2.5km from the SPAs to forage.

On average, people travel no more than 7km to the South Pennine Moors for dog walking. The number of people living within 7km of the SAC and SPAs will increase as a result of the PfE which will place further pressure on these designated habitats from more trips to the moors for recreation, including dog walking. Therefore, within 7km of the SAC and SPAs new development should provide or contribute towards the provision of greenspace as an alternative to visiting the South Pennine Moors and contribute towards the implementation of a Strategic Access, Monitoring and Management Strategy.

These distances from the South Pennine Moors SAC/SPAs fall within the districts of Rochdale, Oldham and Tameside and an SPD will provide further guidance on how criterion 7 of Policy JP-G5 will be implemented, including:

- the exceptions in which development would be permitted within 400m of the SAC/SPAs:
- how land should be assessed for functionally linked habitats within 2.5km of the SPAs, including guidance on avoidance and mitigation; and
- a framework for the provision of Suitable Alternative Natural Greenspace (SANG) and the implementation of a Strategic Access, Monitoring and Management Strategy (SAMMS), including the mechanism for the calculation of the financial contributions, by reference to development types, the level of predicted recreational impact on the SAC and SPAs, and the measures upon which such contributions will be spent.

The peat soils of the uplands store significant volumes of carbon, but extensive areas are degraded. Habitat restoration, particularly of blanket bog, but also other wetland habitats and woodland, will be important for addressing multiple green infrastructure priorities such as sequestering carbon from the atmosphere, minimising flood risk, reducing soil erosion, improving water quality, combating the heat island effect of Greater Manchester and enhancing biodiversity. However, such restoration may have future land use implications, for example by requiring the re-wetting of moorland and/or the blocking of drainage ditches.

6.3 The proposed modifications to the additional criterion 7 of JP-G5 are set out as follows:

7. Ensure that new development close to the SAC and SPAs does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA and the South Pennine Moors Phase 2 SPA from urban edge effects, loss of and/or disturbance to functionally linked habitats and recreation disturbances. This will be implemented by:

- (a) within 400m of the SAC and SPAs boundaries, no development will be permitted, unless, as an exception, the development and/or its use would not have an adverse effect on the integrity of the SAC or SPAs;
- (b) Within 2.5km of the SAC and SPAs boundaries, applications for new development should be accompanied by an assessment to determine if the development site provides foraging habitats for the qualifying bird species of the SPAs. If foraging habitats are found on site, appropriate avoidance and/or mitigation measures will be required.
- (c) Within 7km of the SAC and SPAs boundaries, new residential development will be required to mitigate recreation disturbance impacts on the SAC and SPAs through:
 - (i) the provision of on-site suitable alternative natural greenspace or financially contribute to off-site provision of such greenspace; and
 - (ii) A financial contribution to the implementation of a Strategic Access, Monitoring and Management Strategy for the SAC and SPAs.

AP31. The GMCA's proposed modification to JP-G9 should be amended to clarify what is meant by "pollution impacts".

PfE Response

- 6.4 The amendments to the modifications that we proposed to JP-G9 in response to Q9.10 (Examination Document M9.1) are set out below. For soundness, we have also proposed amendments to the modifications that we proposed to the reasoned justification, also in response to Q9.10.
- 6.5 Amendments to the reasoned justification with a new paragraph after 8.53 that we proposed in response to Q9.10:

In line with the outcomes of the HRA in relation to the Manchester Mosses SAC, Rochdale Canal SAC and the South Pennine Moors SAC / Peak District Moors SPA / South Pennine Moors SPA, where appropriate, new development should: will be required to contribute towards the implementation of measures to mitigate air pollution -the adverse impacts on the Manchester Mosses SAC with reference to Policy JP-C7; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs with reference to Policy JP-G5; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC with reference to policies JPA-2, JPA-20 and JPA-22. these European-designated sites, where appropriate.

- 6.6 The amendments to our proposed modification to insert an additional criterion f. into JP-G9 is as follows:

~~f. Where appropriate, development should: will be expected to contribute towards mitigating any identified air pollution impacts on the Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC. European and international designated habitat sites.~~

M8. Places for Homes

Policy JP-H1 Scale, Distribution and Phasing of New Housing Development

AP32. GMCA to prepare revised modifications to policy JP-H1 to:

- a) Delete the second paragraph “Table 7.1 ... over the plan period” and amend paragraph 7.12 to include a similar statement (and if necessary any further information having regard to the proposed modifications to paragraphs 1.57 and 11.2).
- b) Include in policy JP-H1 the statement 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” (and amend the reasoned justification accordingly).
- c) Include an amended version of Table 7.2 that includes revised annual delivery rate figures for each district that take account of the updated 2022 housing land supply information and a revised plan period of 2022 to 2039. The first phase should relate to 2022-2025, and Bolton should have a flat, rather than stepped, trajectory.
- d) Delete the sentence “Any shortfall or surplus will be distributed over the remainder of the full plan period when calculating five year supply” (and modify paragraph 7.19 accordingly).

PfE response

- 7.1 Modify Policy JP-H1 as follows:

“Policy JP-H1: Scale, Distribution and Phasing of New Housing Development

A minimum of ~~164,880~~ 175,185 net additional dwellings will be delivered over the period ~~2021-37~~ 2022-2039, or an annual average of around 10,305.

~~Table 7.1, defines the land supply, demonstrating that brownfield land will be the predominant source of land over the plan period.~~ The new homes will be of good quality and design, adaptable, supported by the necessary infrastructure and amenities and their distribution (as set out in Table 7.2) will

support the Plan's overall strategy which enables people to reduce the need to travel when taking advantage of our key assets.

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, through their local plans.⁴

The phasing of development is set out in Table 7.2. 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.

Each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan. ~~Any shortfall or surplus will be distributed over the remainder of the full plan period when calculating five-year supply.~~ This work would feed into the regular reviews of this plan, although individual authorities may wish to take specific local action outside the formal review process to ensure that they can maintain delivery rates.”

7.2 Replace Table 7.2 with the following table:

	Annual average	2022-2025	2025-2030	2030-2039	Total
Bolton	787	787	787	787	13,379
Bury	452	246	452	520	7,678
Manchester	3,533	3,533	3,533	3,533	60,061
Oldham	680	404	680	772	11,560
Rochdale	616	568	616	632	10,472
Salford	1,658	1,658	1,658	1,658	28,186
Tameside	485	236	485	568	8,245
Trafford	1,122	817	1,122	1,254	19,077
Wigan	972	814	972	1,025	16,527
PfE	10,305	9,063	10,305	10,719	175,185

7.3 Modify paragraph 7.12 as follows:

“Table 7.1 illustrates that, in numerical terms, the existing supply of potential housing sites identified in the districts' strategic housing land availability assessments and small sites is adequate to meet the overall identified need, and demonstrates that brownfield land will be the predominant source of land over the plan period.

⁴ Please note this sentence was proposed as a modification in response to PQ25 and is not a new addition in response to AP32.

- 7.4 Modify paragraph 7.13 as follows:
“The table below summarises the sources of housing land supply up to 2037 2039⁵.”
- 7.5 Modify paragraph 7.19 as follows:
“Taking all of these factors into account, it is anticipated that there will be around ~~8,732~~ 9,063 housing completions on average up until March 2025, increasing to an average of around 10,305 net additional dwellings per annum up to March 2030 and accelerating to around ~~44,200~~ 10,719 per annum up to March ~~2037~~ 2039. This trajectory is shown below. ~~Whilst the trajectory in this plan is considered to be realistic, given the relatively unknown impacts of Covid-19 at this point in time, it is possible that delivery could in fact be different to that currently anticipated. Therefore, in such an eventuality the surplus or shortfall will be distributed over the remaining years of the plan. In this way, any over delivery within a local planning authority area will not result in that authority being adversely affected when it comes to calculating their five-year housing land supply.~~”
- 7.6 Delete the modification to paragraph 7.20 previously proposed in response to PQ30, as this text is now proposed for inclusion within the policy:
“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.”

Policy JP-H2 Affordability of New Housing

AP33. GMCA to prepare main modifications to:

- a) Part 2 of policy JP-H2 to read “Maximising the delivery of additional affordable homes, including through local plans setting targets for the provision of affordable housing for sale and rent as part of market-led developments based on evidence relating to need and viability” (or similar).
- b) Amend part 3 of policy JP-H2 to delete “either on- or off-site” and “with locally appropriate requirements being set by each local authority”.
- c) Paragraph 7.23, based on the wording proposed in GMCA17 but amended to explain the role of local plans in setting targets for affordable homes for sale and rent as part of market-led residential development schemes, before the final two sentences about a high proportion of affordable homes being delivered through other means.

PfE response

- 7.7 Modify Policy JP-H2 as follows:
“Policy JP-H2: Affordability of New Housing
Substantial improvements will be sought in the ability of people to access housing at a price they can afford, including through:

⁵ An updated Table 7.1 to reflect the 2022-2039 plan period is provided in [GMCA11.1](#) – Table AP5C.

1. Significantly increasing the supply of new housing, in accordance with Policy JP-H 1 'Scale, Distribution and Phasing of New Housing Development', thereby reducing the potential for a shortfall to lead to large house price and rent increases.
2. ~~Aiming to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% being for social rent or affordable rent.~~ Maximising the delivery of additional affordable homes⁸¹, including through local plans setting targets for the provision of affordable housing for sale and rent as part of market-led developments based on evidence relating to need and viability
3. Support provision of affordable housing, ~~either on or off site~~, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), ~~with locally appropriate requirements being set by each local authority~~
4. Working with Government to maximise the amount of public funding being directed towards the provision of new affordable housing
5. Increasing the supply of low-cost market housing, to complement the provision of affordable homes and diversify options for low income households.

⁸¹ A definition of the different forms of affordable housing is given in Annex 2: Glossary (page 64) of the NPPF - see National planning policy framework."

7.8 Modify paragraph 7.23 as follows:

"There are around 72,000 households on the local authority registers, with over 26,000 of these identified as being in reasonable preference for housing.⁷⁹ It is estimated that around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices.⁸⁰ New build is just one of the ways to meet this need. The Greater Manchester Housing Strategy sets out our aim to deliver at least 50,000 additional affordable homes across Greater Manchester as a whole (including Stockport) by 2037. It is important to note that not all affordable housing will be delivered through planning policy requirements and Section 106 Agreements. Local Plans will set targets for the provision of affordable housing for sale and rent as part of market-led residential development schemes. A high proportion of affordable housing is delivered by Local Authorities, Registered Providers and through the use of Government funding. This is likely to continue to be the case

AP34. GMCA to consider whether any of the policies in chapter 11 relating to allocations in the Plan need to be modified to clarify the approach to the provision of affordable housing as part of the proposed development.

PfE response

- 7.9 No additional modifications are currently proposed to any of the policies in chapter 11 to clarify the approach to the provision of affordable housing.
- 7.10 However, the following modification to Policy JPA31 criterion 2 has previously been proposed in our hearing statement [M22.1](#) (paragraph 22.30):

2. Deliver homes across a range of types and tenures in accordance with the Council's affordable housing requirement (currently 15% and split between 60% affordable rented and 40% affordable home ownership) and the Council's most up to date Housing Needs Assessment, which details the housing need of different groups of people;
- 7.11 The following modification to Policy JPA32 criterion 2 has previously been proposed in our hearing statement [M22.1](#) (paragraph 22.61):
2. Deliver homes across a range of types and tenures in accordance with the Council's affordable housing requirement (currently 15% and split between 60% affordable rented and 40% affordable home ownership) and the Council's most up to date Housing Needs Assessment, which details the housing need of different groups of people;

Policy JP-H3 Type, Size and Design of New Housing

AP35. GMCA to prepare a main modification to the second paragraph of policy JP-H3 to read "Residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence" (or similar).

PfE response

- 7.12 Modify the second paragraph of Policy JP-H3 as follows:
- ~~"The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Residential developments should provide an appropriate mix of dwelling types and sizes reflecting local plan policies, and having regard to masterplans, guidance and relevant local evidence."~~

AP36. GMCA to consider whether any main modifications are required to ensure that references to "access", "accessibility" and "accessible" throughout the Plan are clear and unambiguous with regard to achieving safe and suitable access for all users (including disabled people and others with particular mobility requirements).

*The deadline for response to AP36 is **midday on Thursday 12 January 2023.***

- 7.13 Response to follow.

AP37. GMCA to prepare a main modification to delete Table 7.3 Residential Land Supply – Split of houses and apartments, and amend paragraph 7.31 accordingly.

PfE response

- 7.14 Delete the final sentence of paragraph 7.31:
- ~~"The land supply that has been identified responds to these needs as demonstrated by the table below."~~

7.15 Delete Table 7.3 Residential Land Supply – Split of Houses and Apartments.

Policy JP-H4 Density of New Housing

AP38. GMCA to prepare a main modification to policy JP-H4 to:

- a) Amend the first sentence to read “New housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high quality design. Regard should be had to the minimum densities set out below.” (or similar).
- b) Delete “And where it would not compromise the overall delivery of new homes in the district”.
- c) Amend the penultimate section to read “In order to achieve an appropriate mix of housing across the plan area, developments should include the provision of houses and/or apartments having regard to the following and the need to achieve high quality design.” (or similar).
- d) Delete the “Definitions and interpretation” section from the policy and include in the reasoned justification as appropriate.

PfE response

7.16 Modify the first paragraph of Policy JP-H4 as follows:

“New housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport and the need to achieve efficient use of land and high quality design. ~~in accordance with~~ Regard should be had to the minimum densities set out below.”

7.17 Delete the following text from Policy JP-H3:

~~“And where it would not compromise the overall delivery of new homes in the district”.~~

7.18 Modify the penultimate section of Policy JP-H3 as follows:

~~“In order to achieve an appropriate mix of housing across the plan area, the densities above should typically be delivered as follows~~ developments should include the provision of houses and/or apartments having regard to the following and the need to achieve high quality design:

A. 35-70 dwellings per hectare: primarily houses

B. 70-120 dwellings per hectare: mix of houses and apartments

C. 120+ dwellings per hectare: primarily apartments, incorporating houses and/or ground-floor duplexes where practicable

7.19 Delete the final section of Policy JP-H3 as follows:

~~Definitions and interpretation~~

~~• Where more than one density applies to the same part of the site, the highest density should be used. Different densities may apply to different parts of a site.~~

- ~~• Distances should be measured from the boundary of the designated centre or GMAL area.⁸⁵ All distances are measured in a straight line.~~
- ~~• The designated centres are as defined in district local plans.~~

~~⁸⁵ GMAL is an abbreviation of Greater Manchester Accessibility Layer, which measures the accessibility of locations across Greater Manchester by walking and public transport. Areas are scored on a scale of 1-8, with 8 being the most accessible. GMAL scores are published online at data.gov.uk.~~

7.20 Add a new paragraph after paragraph 7.34 and before Policy JP-H4:

"The following definitions and interpretation apply to Policy JP-H4:

- Where more than one density applies to the same part of the site, the highest density should be used. Different densities may apply to different parts of a site.
- Distances should be measured from the boundary of the designated centre or GMAL area.⁸⁵
- All distances are measured in a straight line. The designated centres are as defined in district local plans.

⁸⁵ GMAL is an abbreviation of Greater Manchester Accessibility Layer, which measures the accessibility of locations across Greater Manchester by walking and public transport. Areas are scored on a scale of 1-8, with 8 being the most accessible. GMAL scores are published online at data.gov.uk."