

Examination of Places for Everyone Joint Development Plan Document

Inspectors: William Fieldhouse, Louise Gibbons and Steven Lee

Programme Officers: Yvonne Parker and Helen Wilson

Tel (Yvonne Parker): 07813334305

Tel (Helen Wilson): 07879443035

Email: info@programmeofficers.co.uk

Examination webpage: www.hwa.uk.com/projects/gmca/

IN19 Action Points from weeks 2 and 3 hearing sessions

Introduction

Further to the discussions at the week two and three hearing sessions, the following actions are required by GMCA. We consider these to be necessary at this stage of the examination to inform our consideration of whether the Plan is sound and/or how it could be made sound by main modifications. We may decide in due course that other or different main modifications are required, including to the parts of the Plan that we refer to below. Reasons for any modifications that we do ultimately decide are necessary will be set out in our final report.

Some of the main modifications we describe below may supersede, or require alterations to, modifications proposed earlier in the examination. The GMCA responses should clarify this where necessary. Consequential modifications may also be required to other parts of the Plan. We will advise later in the examination when these should be identified comprehensively by GMCA.

Responses should be submitted to the Programme Officer by **midday on Thursday 22 December 2022** unless otherwise indicated.

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).

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.

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.

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.

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 ...”

JP-Strat7 North East Growth Corridor

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).

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.

JP-Strat8 Wigan-Bolton Corridor

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.

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.

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”.

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...”.

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.
- b) Deletes criterion 7 relating to Local Area Energy Plans, with consequential modifications to reasoned justification as necessary.
- c) Modifies criterion 8 to be clear that any of the subsequent requirements will be subject to viability and/or practicability.
- 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.

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

- 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).
- 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.

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.
- b) Deletes criterion 2c relating to the ‘presumption in favour’ of connection.
- c) Deletes criterion 3 and moves the criteria relating to heat/energy network assessments to reasoned justification.
- d) Modifies Figure 5.1 to identify proposed allocations as heat and energy network opportunity areas.

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.

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.
- b) Provides clarity about the circumstances in which exceptions to the requirements of criterion 4 would apply.
- c) Provides clarity within criterion 8 about the standards development is expected to achieve in terms of water efficiency.

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

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.

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.

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.

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

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.

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).

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

The proposed main modifications relating to JP-C7 will be referred to during the session on Matter 11 (Wednesday 14 December).

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).

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.

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.

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).

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**.*

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.

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.

William Fieldhouse Louise Gibbons Steven Lee

8 December 2022
