

Examination of Places for Everyone Joint Development Plan Document

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IN28 Further Supplementary Questions about GMCA responses to action points relating to thematic policies and ecology evidence

The following further supplementary questions relate to GMCA responses to some of our action points following the relevant hearing sessions.

Any representor who made a relevant representations under regulation 19 may submit a written statement in response to these questions. Statements must contain no more than **500 words** for each question, and include the representor's name in the top right hand corner of each page. GMCA may submit statements if it considers it necessary to clarify the proposed modifications we refer to.

All statements in response to these questions must be submitted to the Programme Officers by **midday on Friday 3 March 2023**. Statements received by that deadline will be published as soon as possible on the examination website. If we decide that further discussion of these issues is required, this is likely to take place at an additional hearing session during the week commencing 27 March 2023.

Policy JP-S2 - Carbon and Energy

Policy JP-S2 was discussed under matter 6. Under AP20(d) we asked the GMCA to prepare a draft main modification to criterion 8a and footnote 31 which would clarify the approach to 'net zero' development and any requirements for 'carbon offsetting'. Related to this, under AP20(f), we asked GMCA to consider whether main modifications were necessary to Table 5.1 in relation to targets on space heat demand, hot water energy demand and renewable energy generation targets.

The GMCA response to these action points was published in GMCA21 (paragraphs 4.10 to 4.14). The suggested modifications sets out how GMCA expect to 'work towards' net zero development up to and beyond 2028. Footnote 31 is suggested to be modified to refer to the 2025 Future Homes Standard.

Paragraph 5.16 is also proposed to be modified to refer to the Mayor's Greater Manchester Environment Fund being a mechanism through which carbon offset payments could be made.

FSQAP20. Are the proposed main modifications to criterion 8 and footnote 31 of policy JP-S2, Table 5.1 and paragraph 5.16 necessary for the Plan to be sound? In particular, are the following proposed modifications justified, effective and consistent with national policy?

- A. The expectation of 'working toward' net zero by 2028.
- B. The approach to different timescales for how net zero is defined.
- C. How and when carbon offsetting payments would be sought and used.

Policy JP-S3 - Heat and Energy Networks

Policy JP-S3 was also discussed under matter 6. This included consideration of suggested modifications put forward by GMCA to Figure 5.1, which identifies Heat and Energy Opportunity Areas. The suggested amendment discussed sought to clarify the intention of the policy and make it clear that the allocations in the Plan should also be considered as Heat and Energy Opportunity Areas.

Action point AP21(d) asked for a draft modification to be added to the schedule reflecting this particular change.

FSQAP21. Is the suggested main modification to Figure 5.1 necessary to make the Plan sound and would this be justified, effective and consistent with national policy in its own right?

Policies JP-J3 and JP-J4 - Employment Land Requirements

In advance of the hearing session covering policies JP-J3 and JP-J4, the GMCA published GMCA15. This set out a methodology for identifying district level requirements for office floorspace and industrial and warehousing floorspace. Following the discussion under matter 7, under AP27 we requested a draft modification setting out the implications of this for JP-J3 and JP-J4 to be prepared. The intention was to assist in our understanding of whether modifications would be necessary. The GMCA response was set out in GMCA21.

FSQAP27. Is it necessary for the Plan to identify district level requirements for employment land to be sound? If so:

- A. Is the GMCA's suggested methodology set out in GMCA15 for distributing requirements robust?
- B. Would the resulting distribution be consistent with the spatial strategy set out in policies Strat1-Strat11?
- C. Would it provide an effective mechanism for local plans, particularly in relation to providing a basis for requirements beyond 2039?

Policy JP-H1 Scale, distribution and phasing of new housing development

In response to AP32, GMCA has proposed a main modification to policy JP-H1 and Table 7.2 that includes revised annual delivery rate figures for each district that take

account of the updated 2022 housing land supply information, revised plan period of 2022 to 2039, and the evidence relating to phasing in each district.

Any responses to the following question should not reiterate points made in representations made under regulation 19 or in written statements in response to our matters, issues and questions but rather focus on the modified figures in comparison to those in the submitted Plan.

FSQAP32. Are the revised housing delivery figures for each district in Table 7.2 for the periods 2022-2025, 2025-2030 and 2030-2039 justified, positively prepared and consistent with national policy?

Policy JP-C7 Transport requirements of new development

In response to AP85, GMCA has proposed a main modification to policy JP-C7 and reasoned justification to set out requirements for transport assessments and a new Appendix D listing indicative transport mitigations associated with each allocation in the Plan.

FSQAP85. Is the proposed approach to carrying out transport assessments in the modified version of policy JP-C7, additional paragraphs following 10.76 and additional Appendix D justified and consistent with national policy? Will the approach be effective in promoting sustainable transport and ensuring that any significant impacts from development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree?

Ecology evidence

Following the hearing sessions relating to some of the site allocations, we published action point 91 asking GMCA to advise what they consider to be relevant, up-to-date, adequate and proportionate evidence on ecology to inform the choice of allocations and the contents of site allocation policies in the Plan¹. The GMCA response was published on 3 February 2023².

FSQAP91. Does the information referred to in the GMCA response to action point 91, including Preliminary Ecological Appraisals based on Greater Manchester Ecology Unit data and knowledge, represent relevant, up-to-date, adequate and proportionate evidence on ecology to inform the choice of allocations and the contents of the site allocation policies in the Plan?

William Fieldhouse Louise Gibbons Steven Lee

16 February 2023

¹ IN24, 26 January 2023.

² GMCA43, 3 February 2023.