PfE Response to IN35 Action Points from week 11 hearing sessions.

Introduction

This document provides the PfE responses to IN35 – Action Points from Week 11 hearing sessions.

As requested by the Inspectors, in previous weeks' Action Points, the modifications are set out in relation to the wording in the submitted Plan[1]. They are presented as the whole policy as set out in the submitted Plan with the changes identified in the usual way using strikethrough and underlining. This includes those proposed in response to IN35, but also to previous Action Points. Where the response to IN35 supersedes, or requires alterations to, modifications proposed earlier in the examination clarification is provided to explain these modifications, where necessary. Where consequential modifications are required to other parts of the Plan, these have been indicated with footnotes.

Where the GMCA, on behalf of the PfE districts, considers it essential to make changes to parts of the policy that have not been referred to in the APs, these have been included in the response for the Inspectors' consideration.

[1] SD1.

Policy JP-S2 – Carbon and Energy

AP136. GMCA to amend the draft modification set out in GMCA21.1 to include:

- Deletion of "from 2028" in criterion 8a.
- Clarity about 'regulated' and 'unregulated' emissions in criteria 8a i-iii and in relation carbon offsetting.
- Clarity about when the carbon offsetting approach would be implemented.
- Consideration whether either the policy and/or supporting text should be amended to clarify the role of districts and/or district local plans in identifying how carbon offsetting could be implemented.

GMCA Response

In response to this Action Point (AP136), it is proposed to amend policy JP-S 2 criterion 8a and to modify the reasoned justification for Policy JP-S 2, for clarity, as set out below. These modifications supersede proposed modifications set out in GMCA21.1 and other Action Points.

For completeness, modifications proposed through GMCA21.1 (paragraphs 1.32-34) in relation to criterion 8a are 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~~W~~ith any residual carbon emissions offset) by following the energy hierarchy, which in order of importance seeks to: […]

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-aframework-definition/). ~~Minimum carbon reduction target expected to be in line with 2025 Future Homes Standard of 80%.~~

- **Deletion of "from 2028" in criterion 8a**
- **Clarity about 'regulated' and 'unregulated emissions' in 8ai-iii and in relation to carbon offsetting.**

The proposed modification to JP-S 2 8a is set out below and deletes "from 2028" in line with discussions during the Week 11 hearing session and also clarifies which parts of the timeline definition of 'net zero' carbon relate to the calculation of 'regulated' and 'unregulated' carbon, to ensure clarity to 8ai-iii. It also clarifies when carbon off-setting becomes relevant.

From the adoption of the PfE Plan, 'net zero' carbon will only apply to 'operational' emissions (these are 'regulated' emissions, ie. energy use as regulated through building regulations). A proposed modification to footnote 31 is suggested to clarify this definition.

From 2025, developers to achieve 'net zero' carbon will need to consider both 'regulated' emissions and also 'unregulated' emissions (such as those associated with cooking and small appliances), paragraph 5.15 of PfE as submitted currently explains this further.

However, to make this clearer and the policy more effective, a modification is proposed to both the policy and supporting text in paragraph 5.15. The policy approach and timeline definition of 'net zero' are based on the recommendation of the Carbon and Energy Implementation Study Part 1 [04.01.01] (page 26 and 35-40). The study recommends the GMCA to adopt a robust London Plan-style policy (London Plan SI 2) that considers energy efficiency, carbon and energy reduction and the ability to off-set the remaining emissions from the building through a carbon off-setting mechanism.

The timeline is considered realistic and achievable and would be future-proofed in line with proposed change to building regulations (Future Homes Standard). The proposed modification as set out below clarifies this timeline and moves the reference to the energy hierarchy, as set out within GMCA21.1, to the supplementary text which follows 8a parts i. ii. and iii. However to assist in explaining the relationship between carbon offsetting and its place within the energy hierarchy some further additional text is proposed.

In addition, paragraph 5.10 of the PfE Plan explains that this timeline is based on the UK Green Building Council definition of 'net zero' carbon and that there is no single definition for net zero carbon buildings. Footnote 31 provides a website link to the UK GBC Framework for a more detailed explanation, if required.

Proposed Modification

Following consideration of AP136 as set out, criterion 8a, the proposed modification is as follows:

8. An expectation that new development will:

~~a. Be net zero (31) carbon from 2028 by following the energy hierarchy (with any residual carbon emissions offset), which in order of importance seeks to:~~

a. Work towards being net zero (31) carbon, which means;

i. Reducing greenhouse gas emissions 'in operation';

ii. From 2025, calculate and minimise 'unregulated' emissions (those connected with cooking and small appliances) alongside 'regulated' emissions; and

iii. From 2028, all emissions 'in construction' should be considered.

Development proposals should set out how this has been achieved in an energy statement in accordance ~~W~~with the energy hierarchy, which in order of importance seeks to:

i. Be Lean - Minimise energy demand;

ii. Be Clean- Maximise energy efficiency;

iii. Be Green - ~~Utilise~~ Use renewable energy/ low carbon energy and/or connect to district heat networks;

iv ~~Utilise low carbon energy;and~~ Finally as a last resort, residual carbon emissions should be offset.

~~v. Utilise other energy sources~~

~~An interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of 2013 Building Regulations (32).~~

From 2025, residual carbon emissions that cannot be fully mitigated on-site should be offset, in agreement with the relevant district, through a financial contribution to a carbon offset fund.

Footnote 31: ~~Applied to operational net zero carbon up to 2028 and considered for net zero 'in construction' from 2028 onwards.~~ Net Zero carbon-'operational' energy: when the amount of carbon emissions associated with the buildings operational energy on an annual basis is zero or negative. Net Zero carbon– 'in construction': when the amount of carbon emissions associated with the building's product and construction stages up to practical completion is zero or negative. UK GBC Publication ' *Net Zero Carbon Buildings: A Framework Definition'.* https://ukgbc.org/resources/net-zero-carbon-buildings-framework/. ~~Minimum carbon reduction target expected to be in line with 2025 Future Homes Standard of 80%.~~

~~Footnote 32: Or until such time that this level is superseded by changes to national building regulations.~~

- **Clarity about when carbon off-setting approach would be implemented.**

The proposed modification to 8aiii) and the further additional following text (set out above) clarifies that when calculating carbon emissions from 2025, the opportunity for carbon-off-setting residual carbon will be available. This is considered to be the point at which it will become more challenging to meet 'net zero' carbon through on-site measures, due to the requirement to consider the 'unregulated' emissions in the calculations [Carbon and Energy Implementation Study Part 1 [04.01.01] page 35/6].

This date also aligns with the timeframe for introduction of the government's Future Homes Standard (changes to Part L and Part F of the Building Regulations for new dwellings) which is scheduled for 2025 and is the point at which carbon off-setting will become relevant. Carbon off-setting will only apply once all opportunities for on-site mitigation have been considered using the energy hierarchy. This is made clearer through a proposed modifications above in relation to the energy hierarchy.

- **Consideration whether either policy and / or supporting text should be amended to clarify the role of districts and / or district local plans in identifying how carbon offsetting could be implemented.**

In response to AP136, a modification to paragraph 5.16 is considered necessary to clarify the role that districts and/ or district plans will play in setting up carbon offsetting mechanisms and in setting a local carbon price. This is informed by the evidence set out in the Carbon and Energy Implementation Paper Part 2 [04.01.02] produced by CSE, which sets out how such carbon offsetting mechanisms could work across the nine PfE districts and considers the legacy of the London Plan policy as a suitable implementation model.

Proposed Modification

The following modification is proposed, deleting the first sentence of paragraph 5.15 of the supporting text and adding a new first sentence for clarity:

~~5.15 Unregulated emissions (e.g. those associated with plug loads/ appliances) are expected to be assessed as part of the requirement to meet 'net zero carbon' in operation from 2025 onwards.~~

5.15 In calculating carbon emissions from 2025, 'unregulated' emissions (eg. those associated with cooking and small appliances) should be assessed, in addition to 'regulated' emissions.

A consequential modification to the last sentence of paragraph 5.16 of the PfE supporting text is also proposed. This will help clarify the role of the districts in carbon off-setting. In addition to using the existing Greater Manchester Environment Fund as a carbon off-setting fund, districts may choose to set up their own carbon off-setting mechanisms and set their own local carbon price.

For completeness, the proposed modification of paragraph 5.16, set out in GMCA21.1 paragraph 1.35, is as follows:

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

The proposed modification in response to AP136 is as follows**:**

5.16 […] The Mayor of Greater Manchester has developed the ~~is developing an Environment Fund~~ Greater Manchester Environment Fund, which provides a mechanism for carbon offset payments to be made. ~~Districts may also develop alternative approaches with Local Plans.~~ Districts may also set up their own carbon off-setting schemes and set their own carbon price. District carbon off-set funds will need to be ring-fenced and used effectively to support local carbon reduction projects and programmes (such as retrofitting existing properties with energy efficiency measures).

Policies JP-J3 – Office Development and JP-J4 – Industry and Warehousing Development

AP137. GMCA to amend the draft modifications for policies JP-J3 and JP-J4 set out in GMCA21.1 to include:

- Deletion of references in proposed reasoned justification for both policies to employment land requirements not being able to be rolled over beyond 2039.
- Deletion of references in proposed reasoned justification for both policies to phasing of office/industrial and warehousing floorspace or provide justification as to why this is necessary to make the plan sound.

GMCA Response

In response to this Action Point (AP137) it is proposed to amend the modified policies for JP-J3 and JP-J4, as set out below, to remove references in both policies to employment land requirements not being able to be rolled over beyond 2039 and to the phasing of office/ industrial and warehousing floorspace. It is not considered that these are necessary to make the plan sound[2].

The entire amended modified policies and reasoned justifications for both JP-J3 and JP-J4 are set out below. These amendments supersede that proposed in GMCA21.1 and any other previous Action Points.

Policy JP-J3: Office Development

At least ~~1,900,000~~ 2,019,000 sqm of accessible new office floorspace will be provided in the Plan area over the period ~~2021-2037~~ 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

[2] In light of these modifications an alteration to the modification proposed in GMCA11.1 to paragraph 1.57 will be necessary, clarifying that the minimum requirement figures set out in Policies JP-J3, JP-J4 should be used to inform local plan target(s).

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, in accordance with Part M (Volume 2) Building Regulations.

~~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.

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.

Table 6.1 Minimum District Office Floorspace Requirement for 2022-2039

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

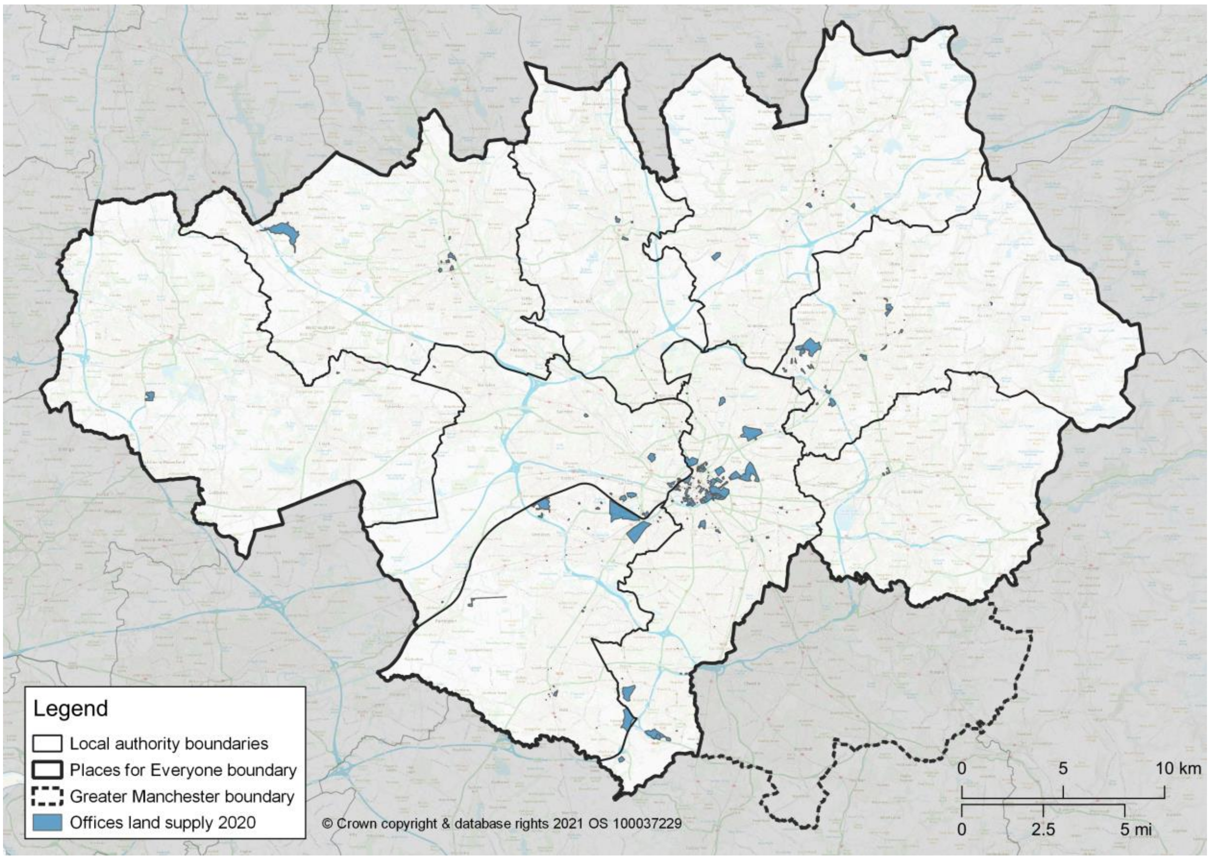
The district minimum requirement for office floorspace will assist in the delivery and monitoring of JP-J3 and inform relevant local plan policies. The minimum district requirements will be used to inform Local Plan policy preparation to deliver their portion of the overall office floorspace requirement.[3]

Office Supply

6.23 A wide range of office development opportunities have been identified by districts through their strategic employment land availability assessments, capable of accommodating just ~~over~~ under ~~3,275,000~~ 2,815,650 sqm of floorspace. This will help to ensure that there is a diverse range of opportunities, providing choice and flexibility in the market. The vast majority of these are in the key growth locations[4] identified in Policy JP-J 3 'Office Development' and are on previously-developed land.

[3] For the avoidance of doubt the reasoned justification text proposed in GMCA21.1 in relation to the employment land requirements for JP-J3 is no longer proposed here.
[4] This additional modification (paragraph 6.23) is considered necessary to ensure consistency with JP-J1 point G and to remove any ambiguity.

Figure 6.2[5] Existing supply of office sites identified in strategic employment land availability assessments ~~2020-2037~~2022-2039



6.24 Although this supply is sufficient in numerical terms to meet the minimum office floorspace requirement up to ~~2037~~ 2039, it is considered that the very limited release of some existing Green Belt land within the Manchester Airport ~~Enterprise Zone~~ key growth location[6] is required to maximise the competitive advantages of Greater Manchester.

6.25 Table ~~6.1~~ 6.2 'Office land supply ~~2020-2037~~ 2022-2039' summarises the sources of office land supply up to ~~2037~~ 2039.

[5] Main modification to Figure 6.2 to be updated as a result of the change to the plan period and updated 2022 land supply.
[6] This additional modification (paragraph 6.24) is considered necessary to ensure consistency with JP-J1 point G and to remove any ambiguity.

Table ~~6.1~~ 6.2 Office land supply ~~2020-2037~~ 2022-2039

~~District~~	~~Existing supply 2020-2037: Brownfield (sqm floorspace)~~	~~Existing supply 2020-2037: Greenfield (sqm floorspace)~~	~~Existing supply 2020-2037: Mixed (sqm floorspace)~~	~~Places for Everyone Allocations 2020-2037 (sqm floorspace)~~[7]	~~Total 2020-2037~~	~~Estimated Completions 2020-21~~	~~Total 2021-37~~
~~Bolton~~	~~79,984~~	~~3,447~~	~~10,512~~	~~0~~	~~93,943~~	~~-3,364~~	~~90,579~~
~~Bury~~	~~11,721~~	~~28,485~~	~~0~~	~~0~~	~~40,206~~	~~-519~~	~~39,686~~
~~Manchester~~	~~2,225,961~~	~~102,514~~	~~-0~~	~~21,500~~	~~2,349,975~~	~~-116,061~~	~~2,233,914~~
~~Oldham~~	~~59,272~~	~~0~~	~~11,554~~	~~0~~	~~70,826~~	~~-9,207~~	~~61,619~~
~~Rochdale~~	~~18,462~~	~~81,249~~	~~0~~	~~0~~	~~99,711~~	~~-4,676~~	~~95,036~~
~~Salford~~	~~348,611~~	~~0~~	~~0~~	~~0~~	~~348,611~~	~~-11,035~~	~~337,576~~
~~Tameside~~	~~26,432~~	~~0~~	~~0~~	~~0~~	~~26,432~~	~~-530~~	~~25,902~~
~~Trafford~~	~~243,428~~	~~15,000~~	~~0~~	~~0~~	~~258,428~~	~~-1,327~~	~~257,101~~
~~Wigan~~	~~0~~	~~2,055~~	~~7,294~~	~~0~~	~~9,349~~	~~0~~	~~9,349~~
~~Places for Everyone~~	~~3,013,871~~	~~232,750~~	~~29,360~~	~~21,500~~	~~3,297,481~~	~~-146,718~~	~~3,150,763~~

[7] ~~Excluding floorspace identified in baseline supply~~

District	Existing Supply 2022-2039 (sqm floorspace)			Places for Everyone Allocations (sqm floorspace)[8]	Total 2022-2039
	Brownfield	Greenfield	Mixed		
Bolton	56,780	3,447	10,512	-	70,739
Bury	1,177	-	-	-	1,177
Manchester	1,873,445	128,484	3,306	64,500	2,069,735
Oldham	67,093	-	14,905	-	81,998
Rochdale	19,753	81,249	-	-	101,002
Salford	309,102	-	-	-	309,102
Tameside	20,110	570	-	-	20,680
Trafford	190,661	33,000	-	-	223,661
Wigan	-	2,055	-	-	2,055
Places for Everyone	2,538,122	248,805	28,723	64,500	2,880,150

[8] Excluding floorspace identified in baseline supply or anticipated to be delivered post-2039.

Industry and Warehousing

6.26 Industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors. It is particularly important to the key economic sectors[9] of advanced manufacturing and logistics but is also crucial to supporting other parts of the economy and its continued provision will help to reduce inequalities.

6.27 Although there have been continued reductions in the numbers employed in manufacturing over many decades, it continues to be a very important sector for Greater Manchester, delivering high levels of productivity and income. Advanced manufacturing is a particular strength, supported by the city-region's high concentration of research assets. Greater Manchester is recognised as an internationally important test-bed for new products and services, renowned for its ability to drive adoption of approved innovations at pace and scale. Enabling the success of this sector will be important for the wider prosperity of the North of England.

6.28 Logistics is a sector that is becoming increasingly central to the economy, enabling the efficient functioning of other sectors such as manufacturing and retail, and supporting changes in consumer behaviour. Greater Manchester's central position in the North of England, its large business and customer market and its excellent international freight connections via Manchester Airport, the Manchester Ship Canal and the nearby Port of Liverpool, as well as its motorway network, notably the M6, together provide opportunities to significantly increase logistics activity within the sub-region. This not only has the potential to promote higher levels of economic growth, but also to support environmental objectives by reducing the number of HGV journeys from the ports and distribution parks across England.

6.29 There is already a varied range of industrial and warehousing locations, ranging from major areas with strong brand recognition such as Trafford Park to numerous smaller employment areas that are an important source of local employment and business opportunities. However, our long-term economic success will partly depend on the ability to continually renew and enhance the

[9] This additional modification is considered necessary for the plan to be consistent with NPPF paragraph 123 which refers to key economic sectors.

supply of accessible industrial and warehousing premises, responding to changing business practices and demands. Rising levels of automation and digitisation, increased customisation, greater integration of product services, and demands for more functionally and energy efficient premises are all leading to the need to increase the supply of new high quality floorspace, often with larger floorplates. At the same time, there will continue to be a demand for smaller and/or cheaper accommodation to support local businesses and start-ups that may often be working on narrow margins but make an important contribution to our economy. All of this points to the need for a diverse portfolio of sites and premises, both retaining existing premises and providing new ones of varying size and location. Promoting and supporting access to the sites and premises by sustainable modes of transport will help to ensure that they will be accessible from both our existing and new communities.

6.30 There is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within Greater Manchester, resulting in the city-region being unable to compete for some major occupiers. When combined with the need to secure a significant increase in the quality of accommodation available to respond to evolving business requirements and increasing global competition, this means that a considerable uplift on past development rates is needed.

Policy JP-J4: 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.

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.

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

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

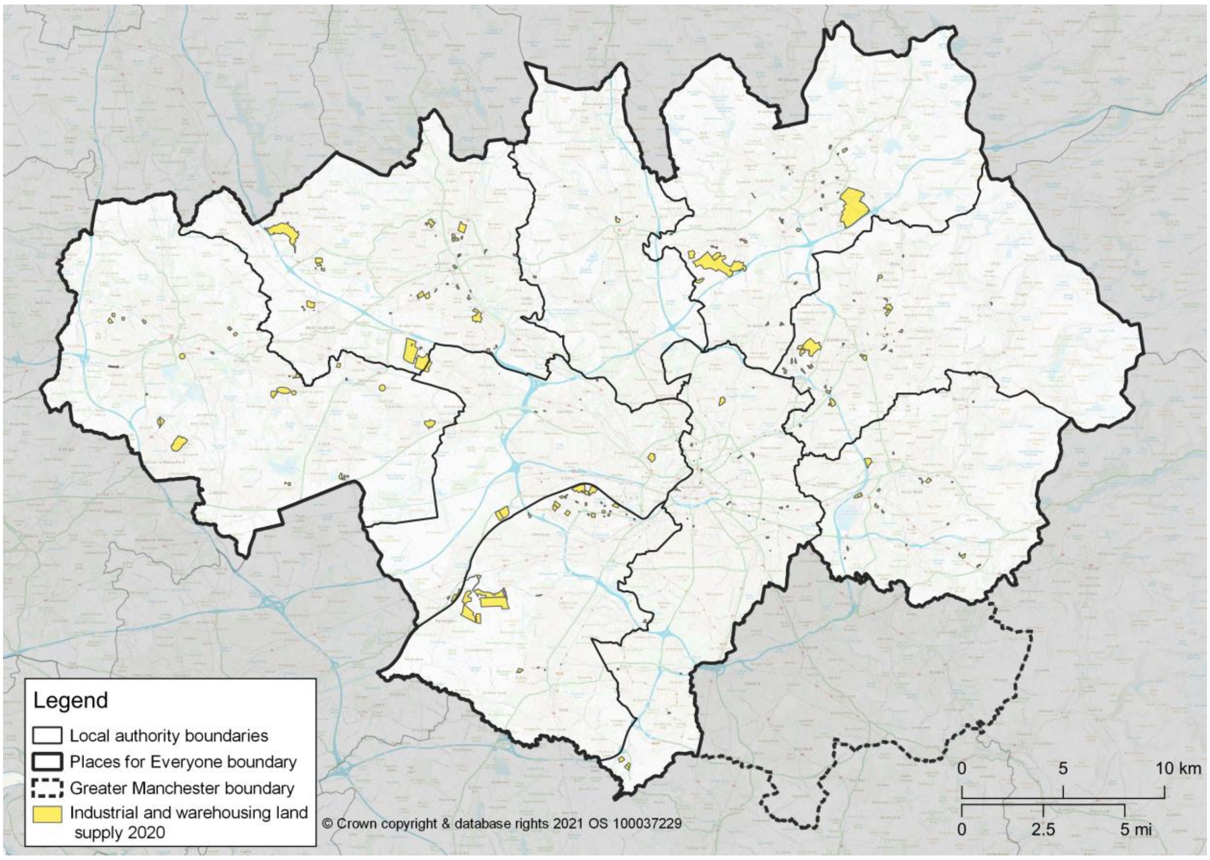
The district minimum requirement for industry and warehousing floorspace will assist in the delivery and monitoring of JP-J4 and inform relevant local plan policies. The minimum district requirements will be used to inform Local Plan policy preparation to deliver their portion of the overall industry and warehousing floorspace requirement. Industry and Warehousing Supply.[10]

6.31 The need to provide the level of industrial and warehousing land within the Plan reflects the need for Greater Manchester to compete internationally for investment and provide sufficient choice and flexibility to respond to the varied needs of different businesses. This will help Greater Manchester to maximise its ability to attract and retain businesses and hence support its long-term economic growth prospects and the availability of local jobs. The new sites will be important in enabling the relocation and expansion of existing businesses, which will free up some poorer quality current employment sites for redevelopment for uses such as housing, as well as attracting new investment into the sub-region. The large amount of flexibility in the supply is also necessary because some existing employment areas may be utilised for employment-generating uses other than industrial and warehousing floorspace, which, whilst making an important contribution to economic growth, may mean they are no longer available for industry and/or warehousing purposes.

6.32 A range of industry and warehousing development opportunities have been identified by districts through their strategic employment land availability assessments, capable of accommodating just over ~~1,900,000~~ 2,070,000 sqm of floorspace.

[10] For the avoidance of doubt the reasoned justification text proposed in GMCA21.1 in relation to the employment land requirements for JP-J4 is no longer proposed here.

Figure 6.3[11] Existing supply of industry and warehousing sites identified in strategic employment land availability assessments ~~2020-2037~~ 2022-2039



6.33 The existing supply of potential industrial and warehousing sites identified in the districts' strategic employment land availability assessments are insufficient to meet the overall identified need. Many of the sites they contain are also likely to be attractive primarily to a relatively local market and/or smaller businesses, due to their location, size and surroundings. Consequently, if Greater Manchester is to meet its future development requirements and increase the supply of high quality sites that can compete regionally, nationally and even internationally for investment, including from businesses requiring large modern premises, then there is a need to identify additional sites across the city-region. The only realistic option for doing so is to remove some land from the Green Belt.

6.34 ~~Table 6.2~~ Table 6.4 'Industry and warehousing land supply ~~2020-2037~~ 2022-2039' summarises the sources of industry and warehousing land supply up to

[11] Main modification to Figure 6.3 to be updated as a result of the change to the plan period and updated 2022 land supply.

~~2037~~ 2039. Although all of the sites could potentially be developed in full during the plan period. In practice, the high level of land supply, the size of some individual sites and infrastructure requirements mean that some of the Green Belt sites may come forward in part after ~~2037~~2039. This will help to ensure that there is a diverse range of opportunities, providing choice and flexibility in the market. Additionally given the scale of some of the opportunities, almost a further ~~480,000~~ 368,400 sqm has been identified which is likely to be delivered after ~~2037~~ 2039.

~~*Table 6.2 Industry and warehousing land supply 2020-2037*~~

~~District~~	~~Existing supply 2020-2037: Brownfield (sqm floorspace)~~	~~Existing supply 2020-2037: Greenfield (sqm floorspace)~~	~~Existing supply 2020-2037: Mixed (sqm floorspace)~~	~~Places for Everyone Allocations 2020-2037 (sqm floorspace)~~[12]	~~Total 2020-2037~~	~~Estimated Completions 2021-21~~	~~Total 2021-37~~
~~Bolton~~	~~252,156~~	~~15,673~~	~~8,653~~	~~486,000~~	~~762,482~~	~~-8,274~~	~~754,208~~
~~Bury~~	~~3,731~~	~~6,500~~	~~0~~	~~491,000~~	~~501,231~~	~~-750~~	~~500,481~~
~~Manchester~~	~~13,745~~	~~64,004~~	~~0~~	~~25,000~~	~~102,749~~	~~-10,107~~	~~92,641~~
~~Oldham~~	~~66,269~~	~~0~~	~~65,252~~	~~136,720~~	~~268,241~~	~~-17,098~~	~~251,143~~
~~Rochdale~~	~~148,690~~	~~203,311~~	~~0~~	~~244,000~~	~~596,001~~	~~-21,085~~	~~574,916~~
~~Salford~~	~~171,531~~	~~32,396~~	~~0~~	~~320,000~~	~~523,927~~	~~-6,414~~	~~517,513~~
~~Tameside~~	~~52,340~~	~~62,415~~	~~1,716~~	~~160,000~~	~~276,471~~	~~-4,659~~	~~271,812~~
~~Trafford~~	~~397,599~~	~~0~~	~~46,450~~	~~92,160~~	~~536,209~~	~~-29,220~~	~~506,989~~
~~Wigan~~	~~65,592~~	~~207,143~~	~~22,512~~	~~200,000~~	~~495,247~~	~~-4,563~~	~~490,685~~
~~Places for Everyone Total~~	~~1,171,653~~	~~591,442~~	~~144,583~~	~~2,154,880~~	~~4,062,558~~	~~-102,169~~	~~3,960,389~~

~~[12] Excluding floorspace identified in baseline supply~~

Table 6.4 Industry and warehousing land supply 2022-2039

District	Existing Supply 2022-2039 (sqm floorspace)			Places for Everyone Allocations (sqm floorspace)[13]	Total 2022-2039
	Brownfield	Greenfield	Mixed		
Bolton	195,913	115,295	8,653	386,000	705,861
Bury	10,725	6,859	-	591,000	608,584
Manchester	37,838	12,855	-	25,000	75,693
Oldham	83,171	-	59,031	136,720	278,922
Rochdale	137,572	203,311	-	244,000	584,883
Salford	224,862	3,454	-	320,000	548,316
Tameside	59,867	52,489	1,716	160,000	274,072
Trafford	414,439	-	26,115	103,365	543,919
Wigan	83,125	303,579	33,117	60,500	480,321
Places for Everyone	1,247,512	697,842	128,632	2,026,585	4,100,571

[13] Excluding floorspace identified in baseline supply or anticipated to be delivered post-2039.

Note for Table ~~6.2~~ 6.4:

1. The floorspace arising at Policy JP Allocation 1.1 'Heywood / Pilsworth (Northern Gateway), has been split between Bury and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.

2. The floorspace arising at Policy JP Allocation 2 'Stakehill', has been split between Oldham and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.

6.35 New industrial and warehousing development has an important role to play in addressing the economic disparities across Greater Manchester, and in particular to boost the competitiveness of northern areas. It can help to deliver more balanced growth across the sub-region and tackle deprivation. Consequently, the release of Green Belt for employment use is focused primarily in the northern parts of Greater Manchester, with a string of high quality opportunities of varying sizes focused particularly around the key motorway corridors. Overall, this will result in around two-thirds of the supply being in the districts of Wigan, Bolton, Bury, Rochdale, Oldham and Tameside, whereas just over one-half of the supply in land availability assessments is in those six districts. The strategic location of Northern Gateway will alone account for about one-fifth of the Greater Manchester supply.

6.36 It will still be important to ensure that there is a good supply of industrial and warehousing in other parts of Greater Manchester, and so there is also some Green Belt release in the central and southern areas. The Green Belt sites have been selected in order to make the most of key assets and locations, with a focus on realising the potential of transport infrastructure such as the motorway network, the Manchester Ship Canal and Manchester Airport. The lowest level of ~~new~~ supply in the northern districts is in Tameside[14], where there will also be a ~~greater~~ reliance on existing sites and premises, such as in the strategically important Tame Valley, which will need to be protected accordingly.

[14] This main modification relating to the industrial and warehousing land supply in Tameside is considered necessary to ensure it is consistent with the supply evidence.

Monitoring Framework

AP138. Having regard to the discussions about the monitoring framework and indicators, GMCA to amend the draft modifications set out in GMCA70 to include:

- Consideration of whether the suggested indicators are adequate to monitor against the Plan's strategic objectives and, if not, suggest amendments.
- Clarification as to what the 'key priorities' are, as referred to in paragraph 12.23, consideration of whether the suggested indicators are adequate to monitor against them and, if not, suggest amendments.
- Amendments, where considered necessary, to ensure that all relevant policies are identified for each indicator and/or 'policy outcome'.
- Clarification about the role of the monitoring framework and how it will reported on (for example, is the intention that the indicators would be reported on in each District's Annual Monitoring Reports (AMR) and/or that the GMCA will prepare their own AMR).
- Clarification about the geographical scale at which indicators are intended to be collected (for example at a district, 'strategy' area and/or plan-wide level). To ensure the spatial strategy of the plan is being delivered it will be necessary for some or all indicators to be collected and reported on at least at the 'strategy' area geographies set out in policies JP-Strat1, JP-Strat5, JP-Strat6 and JP-Strat9. Any district level requirements should also be monitored at that level, as well as any overall requirements.
- Amendments, where considered necessary, to ensure indicators are consistent with the wording of the policy (for example, if a policy refers to floorspace then what is being measured should be floorspace).
- Amendments, where considered necessary, to provide clarity about the scope of any indicators (for example, what aspects of affordable housing are being monitored; all or only those delivered through planning obligations or condition; are different types of affordable housing to be monitored).
- Amendments, where considered necessary, to ensure a consistency of approach to monitoring policies in the Strategy chapter.
- Amendments to indicators relating to planning obligations to break down the different types of contribution (to better illustrate links to relevant policies and outcomes).
- Reintroduction of monitoring indicator for adaptable and accessible homes.

GMCA Response:

In line with the Action Points above and the discussion at the Hearing on the 29th March the GMCA have reviewed the monitoring section of the Plan.

The Strategy section of table 12.1 has been removed and new columns have been added to show the geographical area(s) that each indicator will be monitored against. This will ensure that the framework will adequately monitor against the vision and strategic objectives including analysis of delivery within the spatial strategy area geographies set out in policies JP-Strat1, JP-Strat5, JP-Strat6 and JP-Strat9. The map provided in GMCA6.1 provides indicative boundaries for collating data in strategy areas. However, this map was prepared in response to a specific query and the GMCA response to PFQ26 is clear it is not intended to have weight in relation to Places for Everyone. On that basis, it may be appropriate to review certain boundary details to ensure they are effective for monitoring relevant PfE policies.

Paragraph 12.23 has been amended to remove reference to ‘key priorities’ and to clarify how the framework will be used.

The table has been amended to ensure that all relevant policies are identified for each indicator and/or ‘policy outcome.

A final sentence has been added to explain that the PfE monitoring will form part of each of the districts own Local Plan Authority Monitoring Reports.

Indicators have been amended where necessary to be consistent with the wording of the policy

Although the PfE does not set a target for affordable housing, the framework does include an indicator on the total number of affordable housing units. Indicators are also included to show the amount of S106 funds received to provide affordable housing.

A link to each Districts Infrastructure Statement/Annual S106 monitoring report will be provided as part of the PfE monitoring report to show how much funding is collected in total through S106 agreements and how this is spent. This will be broken down into the different types of contribution where information is available.

Consideration of each of the spatial strategy policies and the practicalities of collating the information has informed the geographical area against which each of the indicators is measured.

The indicator for measuring the percentage of homes meeting the adaptable and accessible standards remains in the monitoring framework.

The proposed changes to the Monitoring section of the Plan including Table 12.1 are shown below.

Text proposed to be added is shown underlined and text proposed to be deleted is struck through. Please note the order of the columns has been modified and new columns have been added.

Proposed modifications to Chapter 12

12.21 Monitoring is a key component of any development plan document and therefore is key to the success of this Plan. To be effective plans need to be kept up-to-date and monitored. We need to regularly monitor performance to assess whether we are achieving our strategic objectives and whether our policies remain relevant, or whether they need to be updated.

12.22 This plan is based on a number of projections, forecasts and research available at this point in time. While these provide a sound basis for the plan’s overall strategy and policies, it is important to understand that circumstances can change and that the plan is flexible to this change. It is therefore important to establish indicators that can be robustly monitored, to gain an understanding of any significant changes that could give rise to reconsideration of the content of the strategy or policies and to update the associated evidence base where required.

12.23 The table below sets out the proposed monitoring framework for the Plan. ~~It focuses on the key priorities of the plan.~~ It sets out the indicators which will be used and the geographical areas each will be applied to. In order to monitor the Vision, Objectives and Strategy effectively, the data for the indicators will be collected across varying geographical areas of the plan. The analysis will have a particular focus on the Core Growth Area (JP-Strat 1), the Inner Areas (JP-Strat 5), the Northern Areas (JP-Strat 6) and the Southern areas (JP-Strat 9). The spatial strategy geographical areas referred to in table 12.1 reflect the Strategic Policies set out in Chapter 4 of the Plan. Until such time that the detailed boundaries of these areas are established in district local plans, the authority monitoring report will illustrate the geographical boundaries to which the data refers.

12.24 The Allocations will be monitored by districts but where a PfE indicator will form part of this monitoring it is noted in the 'Allocation' column of table 12.1.

12.25 The outcomes of PfE monitoring will form part of each of the districts own Local Plan Authority Monitoring Reports.

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
~~Significant growth in employment and housing in the Core Growth Area~~	~~1, 2, 3, 4, 5, 6, 9~~		~~Total employment and housing growth~~				
~~Significant increase in growth employment and housing in north of conurbation~~	~~1, 2, 3, 4, 5, 9~~		~~Total employment and housing growth~~				
~~Sustain the competitiveness of the employment and housing offer in our part of the south of conurbation~~	~~1, 2, 3, 4, 5, 9~~		~~Total employment and housing growth~~				
~~Improve productivity~~	~~3,5,10~~		~~% increase in GVA per job~~				
~~Increased number of jobs~~	~~3,5,10~~		~~Proportion of our residents in employment~~				
~~Secure main town centres as local economic drivers~~	~~1,2,3,5,6,7,9~~		~~% increase in residential development in main town centres~~				
			~~% vacancy rate in main town centres~~				
Sustainable & Resilient							

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
Reduce carbon emissions from new development	2,5,7,8,10	JP-S 1 2, 3 and 7 JP-P 1	~~% of new development meeting the net carbon standard~~ % of net additional residential development completed with an Energy Performance Certificate rating of A and B	✓	✓		
~~Prioritise~~ Maximise the use of suitable previously developed (brownfield) land for development	2,3,5,7,8,9	JP-Strat 1 to 6, JP-Strat 9, JP Strat 12, JP-S1, JP-J2, J3, J4 and JP-H1and H4	% of residential development on brownfield land	✓	✓	1,5,6,9	
			% of gross employment development on brownfield land	✓	✓	1,5,6,9	
No ~~increase in number of~~ new homes and employment premises at risk of flooding	2,8	JP-S 1,and 5 JP-P 1	~~% of homes at risk of flooding~~ No. of planning permissions approved against EA advice	✓	✓		All allocations with housing development
		JP-S 1 and 5 JP-P 1	~~% of commercial premises at risk of flooding~~ No. of planning permissions approved against EA advice	✓	✓		All allocations with employment development

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
Improve air quality	2,5,7,8,10	JP-S1, S2 and S6	~~Number of EV charging points~~				
			~~% of development within 800m of transport hubs~~				
			~~Number of controlled parking zones around schools and early years' settings~~				
			Exceedance of the legal level of NO2 (as an Annual Mean) in local AQMA and Clean Air Plan Monitoring	✓	✓		
Jobs							
Improve productivity	3,5,10	JP-Strat 1 to 12, JP-J 1	% increase in GVA per job	✓	✓	1,5,6,9	
Increased number of jobs	3,5,10	JP-Strat 1 to 12 JP-J 1 and 2	Proportion of our residents (working age) in employment	✓	✓	1,5,6,9	
Improve access to jobs	4,5	JP-Strat 1 to 12 JP1-J 1	Number of local labour agreements	✓	✓		

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
Increase overall ~~employment land~~ office floorspace by 2 million sqm by 2039	3,5	JP-Strat 1 to 12 JP-J1 to 3	~~Deliver 3.3 million sq. m. industry and warehousing by 2037~~ Increase in office floorspace (gross)	✓	✓	1,5,6,9	All allocations with office development
Increase overall industry and warehousing floorspace by 3.5 million sq. m. by 2039	3,5	JP-Strat 1 and 4 to 11, JP-J1,2 and 4	Increase in industry and warehousing floorspace (gross)	✓	✓	1,5,6,9	All allocations with industry or warehousing development
Secure main town centres as local economic drivers	1,2,3,5,6,7,9	JP-Strat 1, 6, 9 and 12 JP-P 4	No of residential units (net) delivered in main town centres	✓	✓		
			GVA in and within 800m of the main town centres	✓	✓		
Homes							
Deliver net increase in new homes	1,2,3,5,7,10	JP-Strat 1 to 3, 5 to 9, 11 and 12, JP-H 1	Deliver approx. ~~8,700~~ 9,063 annually by 2025	✓	✓	1,5,6,9	All allocations with housing development
			Deliver approx. ~~10,300~~ 10,305 annually by 2030	✓	✓	1,5,6,9	All allocations with housing development
			Deliver approx. ~~11,200~~ 10,719 annually by 203~~7~~9	✓	✓	1,5,6,9	All allocations with housing development

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
~~Increase no of additional affordable homes~~ Maximise delivery of additional affordable homes	1,2,5,10	JP-H 1 and H2	~~Deliver our share of 50,000 additional affordable homes by 2037~~ No. of new affordable homes completed	✓	✓		All allocations with housing development
			~~Number of people removed from the waiting list~~				
Increase the number of homes meeting National Described Space Standard (NDSS)	1,2,5,10	JP-H3	% new homes meeting Nationally Described Space Standards (NDSS)	✓	✓		
Increase the number of new homes meeting A&A standard	1,2,5,10	JP-H3	% new homes meeting Accessible & Adaptable (A&A) standard	✓	✓		
Greener							
Enhance the green infrastructure network	2,5,7,8,9,10	JP-Strat 2 and 3, 5, 12, 13 JP-G1-6, 9 and 10 JP-P 1	~~Number of developments delivering a 10% gain in biodiversity~~ Gross area of new habitat created from the application of biodiversity net gain	✓	✓	1,5,6,9	All allocations

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
		JP-Strat 13 JP-G 1-5, 9 and 10 JP-P 1	Number, area and condition of sites of biological importance (SBI's)	✓	✓		All allocations
Increase tree planting	2,5,7,8,9,10	JP-G 7	Number of trees planted annually (metric to be determined with respect to tree planting programmes and on site delivery as a result of planning decisions where available)	✓	✓		
Increase access to green infrastructure	2,5,7,8,9,10	JP-Strat 2, 3,5, 12 and 13 JP-G 2, 3-6 , 9 and 10 JP-P6	Number of hectares of ~~new~~ green infrastructure (metric will consider publicly accessible GI where information is available)	✓	✓	1,5,6,9	
People							
~~High quality design:~~	~~2~~		~~Increase % of new buildings consistent with National Design Guide~~				
Conserve, sustain and enhance our historic environment and heritage assets	2,4	JP-Strat 1 to 3 6 and 12, JP-P1, 2 and 3	Increase % of buildings on the "at risk register" with a strategy for their repair and re-use	✓	✓		

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
~~Improve the cultural offer:~~	~~2,4~~		~~Number of new cultural facilities~~				
Provision of additional school places to support new development	2,9	JP-Strat 1,2 and 9 JP-P 1 and 5	~~Increased n~~Numbers of school places (Annual School Capacity survey). *Consideration of 'headroom' statistics where available.	✓	✓		
~~Increase the % of working age population with Higher Level (4+) qualification(s) and reduce the % of working age population with sub Level 2 qualification(s)~~ Workforce is ready to benefit from new employment opportunities	3,5	JP-Strat 5, 6, 9, 11 and 12 JP-P 5	~~Workforce is ready to benefit from new employment opportunities~~ % of working age population with Higher Level (4+) qualification(s) and % of working age population with sub Level 2 qualification	✓	✓	5,6	
Connected							

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
Increased proportion of daily trips by modes other than the car	2,5,6,7,10	JP-Strat 1 to 12 JP-Strat 14 JP-C 1, 3, 4, 5 and 7	% of daily trips made by active travel, public transport, ~~walking and cycling~~ car & other (monitoring subject to further analysis of data collection methods – TRADS monitor undertaken by TfGM) ~~% of development within 800m of transport hubs~~	✓	✓		
Increased proportion of new development in an accessible location	2,5,6,7,10	JP-Strat 14 JP-S1, S2 and S6 JP-C 1, 3, 4, 6 and 7	% of new housing (net) within 800m of good public transport accessibility and % of new employment floorspace within 800m of good public transport accessibility *definition of good public transport accessibility to be agreed with TfGM	✓	✓	1,5,6,9	
Digital connectivity	2,3,4,5,6	JP-C 2	Number of premises with full fibre connectivity	✓	✓		

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
			~~Number of locations with free, secure, high speed public wi-fi connections~~				
Increasing EV charging infrastructure	2,6,7	JP-S2 and C 7	Number of EV charging points (% change can be monitored year to year or over longer time series)	✓	✓		
Delivering the Plan							

~~PfE KPI/Target Baseline at 2020 unless otherwise stated~~ Policy Outcome	Places for Everyone Strategic Objective	Relevant PfE policy	~~Policy Outcome/~~Indicators	Geographical level to which indicator is monitored			
				Full PfE Area	District	Spatial Strategy Areas set out in Policies JP-Strat 1, 5, 6 and 9	Allocations
Ensuring the right infrastructure is delivered at the right time (broken down by different types of contribution)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10	JP S1, JP S2, JP J1, JP H2, JP G2, JP G3, JP G4, JP G5, JP G6, JP G7, JP G9, JP P1, JP P2, JP P3, JP P5, JP P6, JP P7, JP C1, JP C2, JP C3, JP C4, JP C5, JP C6, JP C7, Allocations (where mitigation is identified)	~~Delivery of necessary new infrastructure~~ Links provided to each District's Infrastructure Funding Statement/ Annual section 106 monitoring report	✓	✓		
Secure appropriate S106 contributions for affordable housing	1, 2, 3, 4, 5, 6, 7, 8, 9, 10	JP-H 1 and H2 JP-D 2	~~Developer contributions for the delivery of infrastructure~~ Developer contributions for the delivery of affordable housing	✓	✓		