January 2019 Draft: WYG Summary

Executive Summary

The new draft GMSF has been published on 6th January 2019, following Mayor Andy Burnham's promise to rewrite the earlier 2016 draft. One of his key campaign pledges was to ensure "no net loss of Green Belt" land. As perhaps could have been expected, this has not been possible, but the new draft does achieve a 50% reduction in the loss of Green Belt from the previous version. The housing requirement has been reduced by only around 10%; a much larger reduction was predicted last July when the ONS released projections for much lower population growth.

Achieving the large-scale reduction in Green Belt release has largely been achieved by seeking to significantly increase the densities of development in town centres and close to public transport hubs. The deliverability of development at these densities (which would require apartment development in many secondary centres and suburban locations) remains to be tested in local housing markets. Considering this, and whether such developments can successfully be integrated within the local character, these factors could undermine the delivery of the housing numbers in the format proposed.

Residential growth is focused on the core urban area of Manchester/Salford/Trafford, with a largely similar distribution between authorities as in the 2016 version. There is a new target for affordable housing, which the previous version lacked.

The Framework is bullish about new employment provision and seeks to direct and encourage economic growth to the 'Core Growth Area', which includes Manchester City Centre, Salford Quays, Trafford Park and Port Salford. This time, the draft GMSF is accompanied by a strategic infrastructure strategy, the lack of which the previous version was criticised for.

The Framework now covers the period 2018-2037, the formal consultation running from 21st January until the 18th March 2019 – but it needs to be approved by all ten councils prior to consultation officially starting. All evidence base documents will be released at the launch of the consultation period.

The timetables for adoption have now been revised to the following:

- Revised draft published Summer 2019
- Examination submission early 2020
- Adoption in late 2020/early 2021

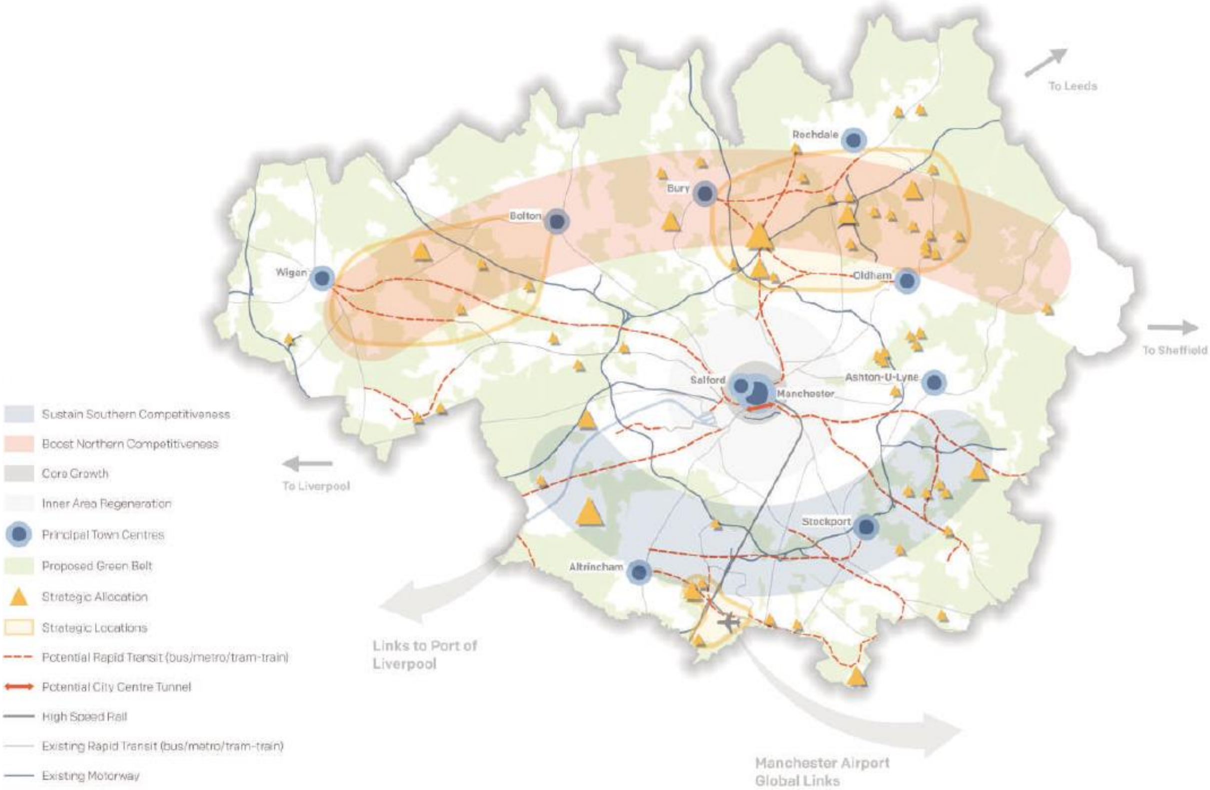
WYG's Manchester Planning Team are keen to support developers and landowners through this consultation. If you would like any help in preparing representations please contact Simon Peake, Associate Director in our Manchester Planning Team (0161 874 8742 or simon.peake@wyg.com).

Strategic Overview

Population growth has been projected at 250,000 people over the plan period, two thirds of which are anticipated as being over 65. Much of this growth will be within the core urban area of Manchester, Salford and Trafford – and in these areas the demographic profile will be much younger than the more suburban authorities. This has translated as a housing requirement for 201,000 new homes (the 2016 requirement was 227,000).

The population across the City Region increased by 200,000 over the last decade, approximately a 10% increase. To place this into context, this is the equivalent of a new Bolton being required in the past 10 years, and a further one being needed for the next 20.

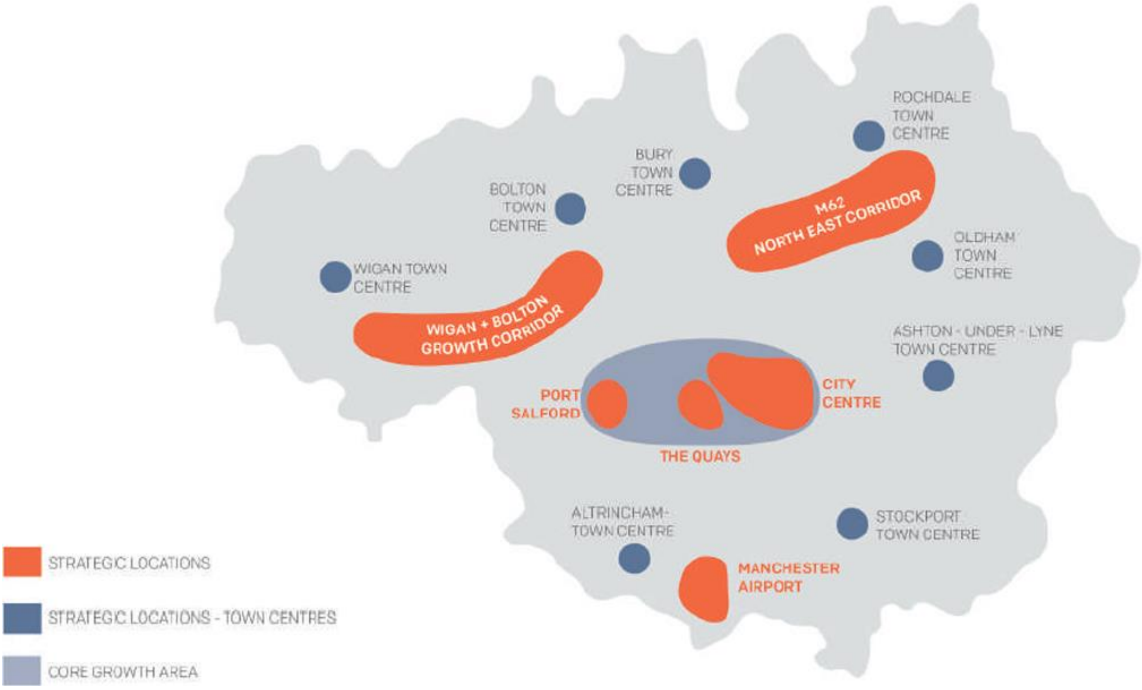
Key diagram for growth across the city region



Economic Growth

The GMSF also outlines strategic areas for economic growth, which include: M62 NE Corridor, Wigan-Bolton Corridor, Manchester Airport and New Carrington:

Strategic Locations



- Policy GM-Strat 2 sets a target of 1.5million sq m of new office floorspace and 50,000 new dwellings to be provided in Manchester City Centre.
- Policy GM-Strat 3 sets a target of around 263,400sq m of new office floorspace and around 8,200 new dwellings to be provided in Salford Quays.
- Policy GM-Strat 12 designates the eight main town centres; Altrincham, Aston-Under-Lyne, Bolton, Bury, Oldham, Rochdale, Stockport and Wigan – these also act as strategic locations for economic growth.

Housing

The overall amount of housing proposed through the GMSF has reduced from 227,500, with an average annual requirement of 11,360 units per annum, to 201,000, with an average annual requirement of around 10,580 per annum – this is a relatively small reduction in response to changes in ONS population growth figures and Government direction on calculating Objectively Assessed Need.

Housing Requirements

District	Total Requirement			Annual Average			Proportion of housing need	
	2016 draft	2019 draft	Change	2016 draft	2019 draft	Change	2016 draft	2019 draft
Bolton	16,800	13,800	-3,000	840	726	-114	7%	7%
Bury	12,500	9,470	-3,030	625	498	-127	6%	5%
Manchester	55,300	54,530	-770	2,765	2,870	105	24%	27%
Oldham	13,700	14,290	590	685	752	67	6%	7%
Rochdale	15,500	12,160	-3,340	775	640	-135	7%	6%
Salford	34,900	32,680	-2,220	1,745	1,720	-25	15%	16%
Stockport	19,300	14,520	-2,780	965	764	-201	9%	7%
Tameside	13,600	8,850	-4,750	680	466	-214	6%	4%
Trafford	23,100	19,280	-3,820	1,155	1,015	-140	10%	10%
Wigan	22,500	21,400	-1,100	1,125	1,126	1	10%	11%
Gtr Manchester	227,500	200,980	-26,520	11,360	10,578	-782	100%	100%

Please note the plan period for the previous iteration was 2016-2035, it is now 2018-2037

The above demonstrates that the Manchester urban area (Manchester/Salford/Trafford) retains the majority of the housing requirement (53%), with only a modest decrease in housing provision when compared to other districts. Oldham is the only outlying authority to have seen an increase in their overall housing requirement, with most other districts seeing relatively significant changes. Despite the reduction in the overall requirement, Wigan's average delivery rate remains largely unchanged from the previous version. Manchester also has an upwards revised delivery rate despite the overall housing requirement falling. It should be noted that this distribution represents a significant departure from the current targets of most of the ten local planning authorities.

Whilst we were provided with some detail in the 2016 version regarding the general source of housing sites (72% of the total proposed housing on brownfield sites and the remining 28% through Green Belt removal), the 2019 version adds significantly more detail to this setting out the housing figures to be delivered from brownfield sites, greenfield sites, small sites allowance and allocations (Green Belt removal) per district.

The Government recently consulted upon changes to its standard housing need methodology, the outcome of which is as yet unknown. The housing figures within the GMSF will require careful scrutiny to ensure it is meeting the needs identified by the amended standard method. It should also be noted that these projections are a minimum requirement and they take no account of economic aspiration.

The 2019 version now sets a target figure for affordable housing across the whole of Greater Manchester through Policy GM-H 2. This states that least 50,000 affordable housing units are to be provided over the plan period (note that this equates to around 22% of the total housing requirement), with at least 30,000 of these being for social/affordable rent. The 2016 version had no specific affordable housing policy, but it did specify for housing allocation sites that the provision of affordable housing should be in line with local planning policy requirements.

Significantly, the 2019 version also now sets specific minimum housing densities through Policy GM-H 4. The previous version mentioned housing densities in a more general manner.

Housing Densities

In this version, housing density should be delivered at a density appropriate to the location, reflecting its level of accessibility. It seeks to increase density in and around designated centres and public transport stops. Areas which fall into two or more different density areas would be required to utilise the higher density standard. The minimum density requirements are set out below:

Location (use highest density that applies when a site falls into more than one location)	Minimum net residential density (dwellings per hectare)		
	Within the location	Within 400m	Within 800m
City Centre	200	120	70
Designated town centre	120	70	50
Other designated centre	70	50	35
Main rail stations and Metrolink stops in the City Centre	N/A	200	120
Other rail stations with frequent service and Metrolink stops in large designated centres	N/A	120	70
Other rail stations with frequent service and Metrolink stops	N/A	70	50
Leigh Guided Busway	N/A	50	35
Areas within GMAL 6 and above	50	35	35

All other locations are to have a minimum net density of 35 dwellings per hectare

In order to achieve an appropriate mix of housing, densities should be delivered as follows:

- 35-70 dwelling per hectare: primarily houses
- 70-120 dwellings per hectare: mix of houses and apartments
- 120+ dwellings per hectare: primarily apartments, incorporating houses and/or ground-floor duplexes where practicable.

This is a significant shift from the 2016 version as the Framework now apportions density standards and housing mixtures across the whole City Region, whereas the previous version had set housing and apartment mixture targets for each district.

The density standards appear to have been set very high, probably as a means to reduce the loss of Green Belt, and will be very challenging to achieve. For example, smaller town centres would have to develop apartment-only schemes to reach 120 dph, and even designated local centres would have to include a significant amount of apartments to reach 70 dph. Requiring 120 dph within 400m of every Metrolink station (or 50 dph within 800m) would introduce large numbers of apartments into significant swathes of suburban areas across most authority areas. The market demand for this level of apartment development outside of the core urban area would be a step change that would need to be tested in the local property market. It would also raise serious questions about local character and the types of places we want to live in, which would need to be tested through the planning system.

The policy does allow for exceptions to the housing density targets based on local market / design grounds. Many schemes are likely to require such justifications, increasing the planning burden, and if most justifications succeed then the spatial strategy for achieving the proposed housing requirement could be undermined.

Retail and Leisure

The Framework anticipates, sensibly, that the majority of the demand for new retail and leisure floorspace can be accommodated in existing centres due to the changing face of retailing and growth of online shopping. Policy GM-E 3 designates Manchester and Salford as the primary City Centre; and Altrincham, Ashton-Under-Lyne, Bolton, Bury, Oldham, Rochdale, Stockport and Wigan as main town centres. The boundaries of the centres are / will be defined in district local plans.

Green Belt

The 2016 version would have seen the release of around 4,900 hectares of Green Belt for development. The 2019 version still sees Green Belt release, however this is reduced to around half of what was previously proposed. The 2016 draft would have seen an 8.2% reduction, this is now 4.1%. 11 new areas of Green Belt have been added but these are relatively minor detail changes.

Allocations

The main changes to the most significant allocations are summarised below.

Bolton

- The North of Bolton Area of Search has been removed. Whilst this was not an allocation per se, it was intended to be a broad area of search for which small sites could potentially come forward for housing development, with an anticipated capacity to deliver 3,000 dwellings. What is interesting is that in this version, no sites have been identified in this area.
- There are now no residential allocations at all within the Bolton local authority area.

Wigan

- M6C1 – Junction 25: amended to form Allocation 48, which has seen the allocation now provide 140,000s q m employment floorspace rather than 332,500 sq m.
- M6C2 – Junction 26: completely removed from the current version. The site was anticipated to deliver over 150,000sq m employment floorspace and around 170 dwellings
- ELR4 – South Pennington: whilst the boundaries are similar to the 2019 version (Allocation 47) the site is now earmarked to deliver 160,000sq m employment rather than 1,000 homes
- ELR5 – Astley and Boothstown: removed from the 2019 version, previously sought to accommodate around 1,000 homes.

Trafford

- WG1 – New Carrington: despite the allocation increasing in size, it seeks to accommodate less overall development. The 2016 version allocated the site for 11,500 new homes and 750,000sq m employment floorspace, it now seeks to accommodate 6,100 dwellings and a minimum of 410,000 sq m employment floorspace.
- WG2 – Western Cadishead and Irlam: the 2016 draft allocated the site for around 2,250 new homes. This has now been amended into in size and seeks to accommodate 1,600 dwellings as Allocation 32 in the new version.
- WG4 – Flixton: removed from the new version. Previously sought to accommodate 900 dwellings.

Oldham

- OA11 – Beal Valley: Though part of the area is retained through GM allocation 14, the housing has reduced from 900 units to 480 units
- AG3 – Timperley Wedge: Has been amended to form Allocation 46. This has seen the amount of housing proposed reduce from 3,300 to 2,400
- Allocation 13 (new) – Ashton Road Corridor: seeks to deliver 260 dwellings
- Allocation 22 (new) – Woodhouses: seeks to deliver 260 dwellings.

Rochdale

- Allocation 25 (new) – Crimble Mill: development of 250 dwellings
- Allocation 27 (new) – Newhey Quarry (Rochdale): development of 250 dwellings
- NG2 – Land East and West of the M62: The sections of the draft 2016 allocation to the east of the M62 have been removed and its southern boundary amended to form GM Allocation 2. The allocation now seeks to deliver around 250,000sq m employment floorspace and 900 homes (previously sought to deliver 480,000sq m employment space and around 2,800 homes)

Stockport

- OA20 – Woodford Aerodrome: has been reduced in size and scale to form Allocation 41. The previous allocation sought to develop around 2,400 dwellings, this is now 750 dwellings
- OA21 – High Lane: has been significantly reduced in size to form Allocation 28. The previous version sought to deliver 4,000 dwellings, this has been reduced to 500 dwellings
- OA22 – Land off A34: has been significantly reduced in size to form Allocation 40. The 2016 version sought to deliver upwards of 3,700 dwellings, this is now 850 dwellings.
- OA23 – Heald Green: the 2016 allocation has been amended to form Allocation 37 in the new version. This has seen a reduction in the proposed amount of dwellings from 2,000 down to 850
- Allocation 35 (new) – Former Offerton High School: development of 250 dwellings.
- Allocation 36 (new) – Gravel Bank Road: development of 250 dwellings
- Allocation 39 (new) – Hyde Bank Meadows: development of 250 dwellings

Tameside

- OA24 – Sidebottom Fold: Removed from the 2019 version
- OA26 – Mottram North and South: removed from the 2019 version
- OA27 – North Aston-Under-Lyne: Removed from the 2019 version
- OA29 – North of New Springs: Removed from the 2019 version
- EG1 Little Moss / Ashton Moss: The allocation, which previously sought to accommodate around 1,980 new homes and 200,000sq m employment floorspace, has had its area east of the M60 and north of the railway removed to form Allocation 42. It previously sought to accommodate 1,980 new homes and 200,000sq m of employment floorspace, it now seeks to accommodate 175,000sq m employment floorspace.

Bury/Oldham

- Northern Gateway 1: The area south of the M60 and east of Heywood Old Road has been removed. Previous Northern Gateway allocation sought to deliver around 1.5m sq m employment floorspace and 5,200 dwellings, this has now reduced to 1.2m sq m employment floorspace and 5,100 dwellings and is an amalgamation of and GM Allocation 2 and 21

Other Policy Areas

There are many more policies on landscape character protection and the provision of green infrastructure.

GM-S 2 Seeks to ensure the City Region is carbon neutral no later than 2028 through measures such as securing sustainable development patterns, taking a positive approach to renewable and low carbon energy schemes and placing the expectation that all new developments will be zero net carbon from 2028 – the previous version sought a 65% reduction in carbon emissions by 2035.

The GMCA have signalled their sustainability aspirations by banning fracking, which places the City Region at odds with current government policy.

The policy's relating to the different landscape type in the City Region have generally remained the same, one point of difference is that the 2019 version has included an additional policy which identifies specific opportunity areas for delivering improvements to the green infrastructure network (Policy GM-G 8).

There are also provisions laid out to develop standards in relation to accessing green space and the levels of on-site green space in new developments (Policy GM-G 9)

Policy GM8 of the 2016 version sought 'significant improvements' in biodiversity, this has been amended and strengthened in draft Policy GM-G 10 by means of seeking a net enhancement in biodiversity and geodiversity.