

Places for Everyone Representation 2021

<b>Family Name</b>	Day
<b>Given Name</b>	Andrew
<b>Company / Organisation</b>	Derwent Group
<b>Person ID</b>	1287117
<b>Title</b>	Stakeholder Submission
<b>Agent Company / Organisation</b>	Aylward Town Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287117_Objective7_Redacted.pdf</a> <a href="#">PFE1287117_JPS2_Redacted.pdf</a> <a href="#">PFE1287117_Para152_Redacted.pdf</a>
<b>Family Name</b>	Day
<b>Given Name</b>	Andrew
<b>Company / Organisation</b>	Derwent Group
<b>Person ID</b>	1287117
<b>Title</b>	JP-Strat 2 City Centre
<b>Agent Company / Organisation</b>	Aylward Town Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287117_JPS2_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Policy JP-S 2 of the Plan sets out an ambition for carbon neutrality by the end of the Plan period and then sets out a framework to seek to achieve that in the context of the development management process.</p> <p>Accompanying text advises that greater carbon use within existing building stock over the Plan period (to 2038) places an onus on new built form to meet net zero carbon standards considerably earlier (by 2028).</p> <p>Despite considerable commentary throughout the document that clarifies that there are significant differences in viability and demand conditions across the GMCA area, the policy does not suggest any granularity as to how this policy framework would be applied. This would be appropriate if that evidence base had tested the least viable areas for the policy on implications of this framework and demonstrated that it would not impede the viable delivery of floorspace which underpins the Plan-led approach. This of course comprises the need to deliver new homes and new employment floorspace.</p> <p>We must state that the Council's 2021 Viability Addendum is entirely focused upon residential development and also the earlier documents from 2020</p>

provide very little content in terms of development typologies beyond residential development. We make no specific commentary in regard to the realism of net zero carbon development or other measures pertaining to the determination of residential development proposals.

Sub-section E of policy JP-S 2 places an obligation for non-residential development to achieve at least BREEAM Excellent on adoption rising to Outstanding from 2028. Regrettably the Council's viability base evidence provides no assessment of even a base case for new employment development even prior to then bolting on the cost implications of such a policy requirement. It therefore fails to demonstrate that the policy-on implications for net zero carbon development for non-residential development are credible.

Through review of the viability evidence which has underpinned the emerging Local Plans for Salford and Trafford, they have undertaken a review of the base case (i.e. the viability of employment development before considering further policy obligations) and this shows that for the majority of employment typologies that the base case position is non-viable. By an obvious implication, bolting on additional obligations will further impede viability and fundamentally undermine the Plan-led requirement for Greater Manchester's population to have ready access to places to work.

Sub-section E should be deleted because the Councils present no evidence to sustain the supposition that these new obligations would have no adverse impact on deliverability.

Sub-section F places an obligation for all development proposals to provide a detailed energy statement to include for a range of measures including whole life cycle emissions and a requirement for post-occupation evaluation. This represents a considerable obligation even for strategic residential development proposals where the GMCA viability evidence would suggest that these typologies can be viable relying upon a policy-on approach.

However, to impose a framework that is universally applicable to all types of development regardless of type or scale will simply present a further viability challenge and mean that all stakeholders in the planning process will be disappointed in the outcomes achieved.

We also note that this would be applicable to minor and major developments, whereas many other policies in the Plan are only applicable to major developments as set out by threshold. This would seem a more appropriate approach, as otherwise it could require this detailed assessment for something as minor as a boundary fence that exceeds any permitted development allowance.

These requirements should be revised accordingly in order to ensure that policy-on implications have been assessed and shown that it would not impede Plan-led delivery targets.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

We set out below proposed changes to Policy JP-S 2 which resolves the point on soundness.

Carbon and Energy

The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, will be supported through a range of measures including:

1. Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling;
2. Promoting the use of life cycle cost and carbon assessment tools to ensure the long term impacts from development can be captured;
3. Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities;

4. Keeping fossil fuels in the ground;
5. Planning for a balanced and smart electricity grid by identifying geographical locations which could support energy assets;
6. Increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques;
7. Development of Local Area Energy plans to develop cost effective pathways to achieve carbon targets;
8. An expectation that new residential development will:
  - a. Be net zero carbon from 2028 by following the energy hierarchy (with any residual carbon emissions offset), which in order of importance seeks to:
    - i. Minimise energy demand;
    - ii. Maximise energy efficiency;
    - iii. Utilise renewable energy;
    - iv. Utilise low carbon energy; and
    - v. Utilise other energy sources.

With an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations

B. Incorporate adequate electric vehicle charging points to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site;

c. Where practicable, prioritise connection to a renewable energy/heating/cooling network in the first instance or a low carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date;

d. Achieve energy demand reductions for residential development in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation.

For renewable energy generation priority should be given to PV installation where technically feasible, alternative technologies will be appropriate where the equivalent generation is evidenced.

e. For non-residential developments, achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028.

f. For major residential development, Include a detailed energy statement to demonstrate via site relevant evidence how the development has sought to maximize reductions in carbon emissions in line with relevant policy targets, including the minimisation of overheating risks and appropriate measures for post occupancy evaluation. Whole life cycle emissions should be considered where possible.

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

Any additional commentary re workplaces will need to be properly based in evidence. We reserve the right to comment in that respect in due course.

<b>Family Name</b>	Day
<b>Given Name</b>	Andrew
<b>Company / Organisation</b>	Derwent Group
<b>Person ID</b>	1287117

<b>Title</b>	Supporting Evidence
<b>Agent Company / Organisation</b>	Aylward Town Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287117_JPS2_Redacted.pdf</a>
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Viability</p> <p>We must state that the Council's 2021 Viability Addendum is entirely focused upon residential development and also the earlier documents from 2020 provide very little content in terms of development typologies beyond residential development. We make no specific commentary in regard to the realism of net zero carbon development or other measures pertaining to the determination of residential development proposals.</p> <p>Sub-section E of policy JP-S 2 places an obligation for non-residential development to achieve at least BREEAM Excellent on adoption rising to Outstanding from 2028. Regrettably the Council's viability base evidence provides no assessment of even a base case for new employment development even prior to then bolting on the cost implications of such a policy requirement. It therefore fails to demonstrate that the policy-on implications for net zero carbon development for non-residential development are credible.</p> <p>Through review of the viability evidence which has underpinned the emerging Local Plans for Salford and Trafford, they have undertaken a review of the base case (i.e. the viability of employment development before considering further policy obligations) and this shows that for the majority of employment typologies that the base case position is non-viable. By an obvious implication, bolting on additional obligations will further impede viability and fundamentally undermine the Plan-led requirement for Greater Manchester's population to have ready access to places to work.</p> <p>Our comments in this respect predominantly relate to the paucity of the Council's evidence to demonstrate that the proposed policy framework (in regard to the obligations imposed upon new non-residential development) has been properly considered and that it would demonstrably create no impediment to the Plan-led objectives for new floorspace and for ambition statements such as that set out at paragraph 1.52.</p> <p>We feel that it will be helpful for the Inspector to have these points drawn out during the hearings so that he/she can determine whether the Council's evidence is sound. Our attendance at the hearing session to provide responses to the Council's comments will assist the Inspector.</p> <p>If unsound, the Inspector can then look to direct the Councils to provide more effective evidence and then revise the relevant policy obligations or Plan text as appropriate.</p> <p>Paragraph 1.52 of the Plan sets out an ambition for carbon neutrality by the end of the Plan period and infers it is evidence-based. We must state that the Council's 2021 Viability Addendum is entirely focused upon residential development and also the earlier documents from 2020</p>

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	<p>provide very little content in terms of development typologies beyond residential development.</p> <p>We make no specific commentary in regard to the realism of net zero carbon development for residential development but it is absolutely clear that the Plan provides insufficient (i.e. there is none) evidence to demonstrate that the policy-on implications for net zero carbon development for non-residential development are credible. In order for this to be resolved the reference to workplaces should be removed in this paragraph because the Councils present no evidence to sustain this supposition.</p>
<b>Family Name</b>	Day
<b>Given Name</b>	Andrew
<b>Company / Organisation</b>	Derwent Group
<b>Person ID</b>	1287117
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Aylward Town Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287117_Objective7_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Objective 7</p> <p>Objective 7 is essentially a concise framework for many of the detailed policies that underpin the document as a whole.</p> <p>The first point is likely to be a typographical error. In other parts of the document it sets out an ambition for carbon neutrality to be achieved by 2038, whereas here it suggests 2028. This needs to be resolved for consistency which we would assume would result in a change to 2038.</p> <p>Beyond that, we have set out in our other representations that the ambition for carbon neutrality (at least in the prism of non-residential uses) is not evidence-based. The Plan provides insufficient (i.e. there is none) evidence to demonstrate that the policy-on implications for net zero carbon development for non-residential development have been properly investigated and assessed and could remain credible.</p>
<b>Redacted modification - Please set out the modification(s) you</b>	<p>Objective 7</p> <p>We set out below proposed changes to Objective 7 which could resolve these points on soundness.</p>

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<p><b>consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.</p> <p>We will:</p> <ul style="list-style-type: none"> <li>• Promote carbon neutrality of new development by 2028 2038;</li> <li>• Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air;</li> <li>• Locate and design development to reduce car dependency;</li> <li>• Facilitate provision of infrastructure for cleaner vehicles;</li> <li>• Improve energy efficiency and the generation of renewable and low carbon energy for residential uses.</li> </ul> <p>Any additional commentary re workplaces will need to be properly based in evidence. We reserve the right to comment in that respect in due course.</p>
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<p><b>Given Name</b></p>	<p>Andrew</p>
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<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>Yes</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>Yes</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>Chapter 1, Para 1.52</p> <p>Paragraph 1.52 of the Plan sets out an ambition for carbon neutrality by the end of the Plan period and infers it is evidence-based. We must state that the Council's 2021 Viability Addendum is entirely focused upon residential development and also the earlier documents from 2020 provide very little content in terms of development typologies beyond residential development.</p> <p>We make no specific commentary in regard to the realism of net zero carbon development for residential development but it is absolutely clear that the Plan provides insufficient (i.e. there is none) evidence to demonstrate that the policy-on implications for net zero carbon development</p>

	<p>for non-residential development are credible. In order for this to be resolved the reference to workplaces should be removed in this paragraph because the Councils present no evidence to sustain this supposition.</p> <p>We would accept that the Plan should make comment in terms of ambitions to make employment development as sustainable as is practicable, but those ambitions should be based in evidence and therefore providing confidence that the policy-on implications have been assessed and shown that it would not impede Plan-led delivery targets.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Chapter 1, Para 1.52</p> <p>We set out below proposed changes to paragraph 1.52 which resolves the point on soundness.</p> <p>“This Plan sets out proposals to support the Greater Manchester ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 at the latest – we do not want to build homes and workplaces which require retrofitting in the future and we have set an ambitious target, backed up by our evidence to achieve this as soon possible. Our commitment to keep fossil fuels in the ground remains, at this time therefore we will not support fracking.”</p> <p>Any additional commentary re workplaces will need to be properly based in evidence. We reserve the right to comment in that respect in due course.</p>