Places for Everyone

Housing Topic Paper

July 2021

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1 Introduction

1.1 To help explain the Places for Everyone Joint Development Plan, a series of Topic Papers has been prepared. This is to explain the reasons for the policies in the draft PfE Joint Plan.

1.2 Each Topic Paper summarises and cross-references the relevant evidence and explains how this has informed the draft Places for Everyone Joint Development Plan Document. Each Topic Paper summarises the previous consultation comments that are relevant to the topic. The Topic Papers explain how the draft plan policies and allocations have been derived based on the evidence, consultation comments and Integrated Assessment.

1.3 The nine districts have chosen to prepare Topic Papers to be transparent in how the plan has been prepared and to provide a more understandable summary of the background technical information.

What is the Places for Everyone Joint Plan?

1.4 Places for Everyone will set out how the plan area should develop up to the year 2037. It will:

- Identify the amount of new development that will come forward across the plan area, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused.
- Ensure we have an appropriate supply of land to meet this need.
- Protect the important environmental assets across the plan area.
- Allocate sites for employment and housing outside of the urban area.
- Support the delivery of key infrastructure, such as transport and utilities.
- Define a new Green Belt boundary for the plan area.

Background

1.5 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan

Document ("Joint DPD"), called the Greater Manchester Spatial Framework ("GMSF") and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.

1.6 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.

1.7 On the 30 October 2020 the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.

1.8 At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.

1.9 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.

1.10 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained. Consequently, at its meeting on the 11th December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.

1.11 Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has 'substantially the same effect' on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.

1.12 In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan is proceeding directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

1.13 Four consultations took place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.

1.14 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.

1.15 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

1.16 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. Given the basis on which the Plan has been prepared, this evidence base remains the fundamental basis for the PfE 2021and has remained available on the Greater Manchester Combined Authority’s (GMCA) website since October 2020. That said, this evidence base has been reviewed and updated in the light of the change from GMSF 2020 to the PfE2021 and, where appropriate, addendum reports have been produced and should be read in conjunction with evidence base made available in October 2020. The evidence documents which have informed the plan are available via the GMCA's website.

2 Policy context

2.1 This section summarises the key pieces of national policy and legislation that has had an impact on the plan. Much of the policy requirements for local planning come from the Revised National Planning Policy Framework (NPPF)

National Planning Policy Framework

2.2 The National Planning Policy Framework (NPPF) provides the national policies for plan-making. It details key policies against which development plans will be assessed and with which they must comply. It requires plans to be justified and based on proportionate evidence, taking into account relevant market signal.

2.3 The current NPPF was published in February 2019. Paragraph 11 of the NPPF sets a presumption in favour of sustainable development whereby local plans should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change.

2.4 The NPPF sets out that all plans should determine the minimum number of homes needed using the standard method.

2.5 "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (NPPF, Paragraph 60).

2.6 Within this context, Paragraph 61 of the NPPF includes the recommendation that planning authorities should assess the size, type and tenure of housing needed for different groups in the community and reflect this within their planning policies. Paragraph 31 of the NPPF states that each local planning authority should ensure the local plan uses a proportionate evidence base that is relevant and up-to-date. This should be adequate and focused tightly on supporting and justifying policies, and take into account relevant market signals. The GM Strategic Market Housing Assessment, published alongside the Publication GMSF, brings together relevant evidence to comply with this.

Planning Practice Guidance

2.7 Planning practice guidance (PPG) was issued by Government in March 2015 and updated in September 2018,July 2019 and December 2020, and contains guidance on 'Housing and economic needs assessment'. This provides advice on how key elements of the NPPF should be interpreted, including the approach to deriving an assessment of Local Housing Need. Housing need in the guidance is defined as below:

"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations." (Paragraph: 001 Reference ID: 2a-001-20190220, Revision date: 20 02 2019).

Local Housing Need Methodology

2.8 The NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. Whilst use of the standard method is not mandatory if it is felt that circumstances warrant an alternative approach, there is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances, and would be subject to close scrutiny at examination.

2.9 The latest methodology was published in December 2020 and and is set out in more detail in Section 3 of this report. It takes projected population and household growth (from the 2014-based projections) and applies an affordability uplift to provide a local housing need figure, plus an additional 35% uplift which applies to the largest cities and urban areas which includes Manchester City Council. At the time of writing the latest methodology results in an total annual need figure of 10,305 per annum across the plan area.

2.10 The Government guidance makes it clear that any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method as set out in NPPF, and that it is not conisdered that these projections provide an appropriate basis for use in the standard method.

2.11 The August 2020 "Planning for the Future" White Paper proposes further future changes to the standard method to focus on areas of affordability pressure and take into account land constraints, to set binding housing requirements that local planning authorities would have to deliver through their Local Plans, and consistent with the Government's aspirations of delivering 300,000 homes annually.

2.12 At the present time the outcomes of the "Planning for the Future" White Paper consultation is unknown, and the standard method set out in PPG (December 2020 update) remains the current Government methodology.

2.13 While Brexit and the Covid-19 pandemic may alter future population and household trends, any attempt to adjust forward projections would have a high degree of uncertainty, even if Government had not introduced the standardised methodology.

2.14 We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.

Greater Manchester Housing Strategy

2.15 Published in June 2019, the Greater Manchester Housing Strategy identifies safe, decent and affordable housing as a priority for the city region so that homes fit the needs and aspirations of current and future citizens. It sets strategic actions at a city region level, designed to maximise the impact of our collective efforts and to complement the huge amount of work and investment going on every day at district and neighbourhood level. The strategy is built on understanding the connections between housing, people and place, the need to invest in the homes we already have, and the importance of building the new homes we need. The Greater Manchester Housing Strategy provides a framework for the final version of PfE around the key issues of existing homes; future homes; and delivering change.

3 Summary of evidence

Greater Manchester Strategic Housing Market Assessment

3.1 The GM Strategic Housing Market Assessment (SHMA) has been produced by the Greater Manchester Combined Authority (GMCA). The purpose of the SHMA is to present a clear, evidenced picture of the Greater Manchester housing market and how it is changing, to provide an assessment of future needs for both market and affordable housing, and to explore the housing needs of different groups within the population over the next twenty years. Although Stockport Council is not part of the Places for Everyone plan, the GM SHMA conclusions remain valid as far as they apply to the nine districts preparing the Places for Everyone plan. The key outcomes are summarised below:

- Greater Manchester is a large and diverse city region which, while well connected to our neighbours, can reasonably be defined as a housing market for planning purposes. This conclusion is based on detailed analysis of the housing market, which shows that more than four out of every five households who move into a home in Greater Manchester already live here. Nearly nine in ten working people who live in Greater Manchester also work here, and of Greater Manchester residents who work here, two-fifths travel to another Greater Manchester district for work, showing how interconnected we are as a city region. The complex functioning of housing and labour markets within Greater Manchester means that there is no simple way of subdividing the conurbation into separate identifiable housing market areas.

- Greater Manchester has a very diverse population:
  - 20% of Greater Manchester residents are aged under 30;
  - Greater Manchester has a fast growing older population;
  - Greater Manchester is slightly more ethnically diverse than England and Wales as a whole;
  - There are more single person households than any other type of household;

- Residents are increasingly likely to rent their homes in the private sector, especially the younger resident and those from black and minority ethnic communities;
- Household incomes are significantly lower than the national average and Greater Manchester has high levels of deprivation;
- Homelessness and rough sleeping have risen in recent years;
- Greater Manchester has a large proportion of terraced and semi-detached houses and one and two bed homes, when compared to the rest of the country;
- Around six out of ten households are owner-occupied, and almost half of those have bought the property outright. About two in ten households rent from a housing association or local authority, with the remainder renting privately;
- Around one in twenty households are in overcrowded accommodation, concentrated in the rented sector;
- Two-thirds of households (and 80% of owner-occupiers) have at least one spare bedroom.

- House prices in Greater Manchester as a whole have remained substantially below national averages, but these are improving and have shown a higher rate of increase than the national average. Between 2019 and 2020 there was an increase of 4% compared to 4% for the North West region and 3% for England & Wales. In 2020, the average price paid in Greater Manchester was £180,947, compared to £249,647 in England & Wales. Private rents are also lower than national averages – the median monthly rent in 2019/20 was £625 in Greater Manchester and £725 in England. However, Greater Manchester also has relatively low average household incomes that mean many residents find meeting housing costs a challenge. Average figures for Greater Manchester mask patterns within the city region. Trafford is significantly higher the GM as a whole for both buying and renting. Rents in Manchester are also higher, reflecting the city centre market, in all districts, the differences between neighbourhoods can be substantial.

- One in five homes in Greater Manchester are in the social housing sector, and around 95% of those are at social rents. Over 72,000 households in the joint plan area were on a local authority housing register in 2019/20, of which 26,750 assessed as having a priority need for a home.

- New housebuilding continues to slowly recover from the post-2008 collapse in delivery, with 12,443 net additional dwellings built in the PfE plan area in 2019/20. This is a 15% increase on the 10,797 net additional homes delivered in 2018/19, and is driven by new developments in the central areas of Salford and Manchester. Nationally there was a 1.1% increase in net additional dwellings. Five of the districts (Bolton, Bury, Rochdale, Tameside and Trafford) however, experienced some decline in completions since the previous year.

- Empty dwellings are at historically low levels matching those of England as a whole. In 2019, 2.6% of dwellings across the PfE plan area were classed as empty, which is slightly lower than the level in England as a whole (2.7%). 0.9% of dwellings were classed as long term empty homes, which is consistent with the national average. The total number of vacant properties has fallen by 39% across Greater Manchester since 2006.

- Greater Manchester residents have relatively poor health and lower life expectancies than the national average. There is a growing older population, with nearly 3 in 20 residents projected to be 75 years or older in 20 years time, although the population profile will still be younger than the national average. At the same time, the number of homes needed for families with dependent children will grow by almost 10%, though almost all that growth will be in families with only one child. By 2035, almost one in three GM residents aged 65 or over will have a long term illness that limits day to day activities 'a lot', and just under 8% will have dementia.

- Using the Government methodology for assessing affordable housing need gives a figure of 5,214 for the 9 districts that make up the PfE plan area. (5,850 households per annum for Greater Manchester as a whole). That is not a target for building new affordable house building through the planning system, but it is something that needs to be considered in developing the

Joint Plan and in work with Homes England, housing proiders and other partners to deliver the affordable homes we need for the future.

3.2 The latest ONS population estimates for mid-2020 were released on 25 June 2021 after the SHMA had been finalised. They show that the total population of the PfE plan area is 2,554,000 and has increased by 11,600 (0.46%) in the year to mid-2020. These latest estimates do not impact on the plan.

Local Housing Need

3.3 The SHMA also sets out the Local Housing Need for the ten Greater Manchester local authorities. As outlined above, Government wants local authorities to have a clear and consistent understanding of the number of new homes needed in an area.

3.4 They have proposed a standard methodology to calculate a figure for 'local housing need'. The updated methodology was published in December 2020 and sets out the method for calculating the minimum housing need for an area. It takes projected population and household growth and applies an affordability uplift to provide a local housing need figure, plus an additional 35% uplift which applies to the largest cities and urban areas which includes Manchester City Council.

3.5 Under the current methodology the overall annual housing need for the nine districts that make up the Places for Everyone plan area is currently 10,305 new homes per year. This includes an uplift of 1,164 homes per year to take account of signs that housing is becoming less affordable in Greater Manchester, and a further uplift of 914 per year as a result of the cities and urban centres uplift for Manchester.

3.6 The total housing need figure is worked out district by district and added together to give a Places for Everyone total figure. That figure is being distributed between districts differently, through the Places for Everyone process.

Methodology

3.7 The December 2020 methodology for calculating Local Housing Need (LHN) consists of four components. The first step is to set a demographic baseline. There is then an adjustment to take account of affordability, and a cap is applied to ensure that local authorities are left with a deliverable and achievable housing need figure after updating their local plans. The fourth and final step is to apply a 35% uplift for those urban local authorities in the top 20 cities and urban centres by population size.

- Step 1: Setting the baseline
- Step 2: An adjustment to take account of affordability
- Step 3: Capping of any increase
- Step 4: 35% uplift for cities and urban centres

Step 1: Setting the baseline:

3.8 As described above, the starting point for the LHN calculation is projections of future household growth. The PPG states that the 2014-based projections should be used:

"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes." (Paragraph: 005 Reference ID: 2a-005-20190220, Revision date: 20 02 2019)

3.9 It is recommended that ten-year average household growth figures are used for the Local Housing Need calculation - this should be ten consecutive years using the current year as the starting point - as plans are expected to be reviewed every five years and so average growth over a ten year period gives a baseline for effective planning for the preparation and duration of the plan.

3.10 It is noted that these projections should be seen as the minimum housing need figure for the area. The 2014-based projections for Greater Manchester local authorities are set out below.

Table 3.1: Household growth projections for the PfE Plan Area 2021-2031

Area	Total household growth, 2021-31	Average annual household growth over 10 year period
Bolton	7,078	708
Bury	5,071	507
Manchester	23,350	2,334
Oldham	6,329	639
Rochdale	4,582	458
Salford	12,122	1,212
Tameside	5,680	568

Area	Total household growth, 2021-31	Average annual household growth over 10 year period
Trafford	10,140	1,014
Wigan	7,927	793
PfE Plan Area	82,269	8,227

Step 2: An adjustment to take account of affordability

3.11 The table below outlines the results of the calculations applied in Step 2 of the methodology.

Table 3.2: Median workplace affordability ratios and adjustment factors

Area	Median workplace affordability ratio (2020)	Adjustment factor (based on affordability ratio)	Adjustment factor plus 1	Adjustment factor plus 1 x annual projected household growth
Bolton	5.71	0.11	1.11	783
Bury	6.65	0.17	1.17	591
Manchester	5.91	0.12	1.12	2,613
Oldham	5.11	0.07	1.07	677
Rochdale	5.58	0.10	1.10	503
Salford	5.47	0.09	1.09	1,324
Tameside	6.34	0.15	1.15	651
Trafford	9.72	0.36	1.36	1,377
Wigan	5.61	0.10	1.10	872
PfE Plan Area				9,391

(Source: ONS, Ratio of house price to workplace-based earnings (lower quartile and median) Table 5c: Ratio of median house price to median gross annual (where available) workplace based earnings by local authority district, England and Wales, 1997 to 2020)

Step 3: Capping of any increase

3.12 To ensure that local authorities are left with a deliverable and achievable housing need figure, the methodology includes criteria to cap the level of increase. However under this criteria, none of the LHN figures for the Places for Everyone districts require capping.

Step 4: Cities and urban centres uplift

3.13 The December 2020 revisions to the LHN methodology introduced a new requirement to apply a 35% uplift to those urban local authorities in the top 20 cities and urban centres list published by ONS. Whether a cities and urban centres uplift applies depends on whether the local authority contains the largest proportion of population for one of the 20 cities or urban centres within the list.

3.14 As at December 2020, Manchester is ranked 5th. Manchester City Council area contains the largest proportion of Manchester's population, and therefore has an uplift of 35% applied, which equates to 914 additional dwellings per year.

3.15 The table below outlines the results of the Local Housing Need Methodology.

Table 3.3: Local Housing Need

Area	Total Annual Local Housing Need	Total Local Housing Need over the plan period (16 years)
Bolton	783	12,528
Bury	591	9,456
Manchester	3,527	56,432
Oldham	677	10,832
Rochdale	503	8,048
Salford	1,324	21,184
Tameside	651	10,416
Trafford	1,377	22,032
Wigan	872	13,952
PfE plan area	10,305	164,880

Growth and Spatial Options Paper

3.16 As part of the process of preparing the Joint Plan one of the requirements is to demonstrate how the amount and spatial distribution of growth across the plan area has been chosen. This is set out in the Growth and Spatial Options Paper which sets out how the options have evolved during plan preparation and the reasonable alternatives that have been considered.

Affordable Housing

3.17 We all need homes that we can afford, however trying to agree what we mean by 'affordable' homes can be a complex task. Government guidance tells us we should try to assess affordable housing need to help us decide how much additional housing we need overall, based on their definition of “housing for sale or rent, for those whose needs are not met by the market”, and includes affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership.

3.18 The SHMA provides an assessment of affordable housing need which is compliant with Government guidance to identify whether there is a shortfall or surplus of affordable housing in Greater Manchester. The method Government asks us to follow includes estimates of:

- The need for affordable housing now
- How that might change through time
- How many affordable homes will be available to re-let as people move out of them
- How many affordable homes will be built or could be made available from empty properties

3.19 To make that calculation, we also need to make forecasts and assumptions about a range of things including how many and what type of households will emerge in the future, how many might be homeless, in temporary accommodation or overcrowded, what household incomes might be and the future costs of renting and buying property, across different parts of Greater Manchester.

3.20 The figure arrived at in the SHMA is a total annual need figure for affordable housing of 5,214 households for the PfE plan area. It is important to stress that this is based on addressing any past backlog over a 5 year period and is not an annual target for the whole of the plan period or a target for building new affordable house building through the planning system, but is something we need to consider in developing the Joint Plan and in our work with Homes England, housing providers and other partners to deliver the affordable homes we need for the future. This will be delivered in a variety of ways, including new build homes, a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, such as extra care provision.

3.21 The link between the affordable housing need and the overall need for housing (or the local housing need) is complex. Many of the households in need are already living in accommodation (existing households) and simply require an alternative form of housing, and the analysis does not suggest that there is any strong evidence of a need to allocate additional housing land specifically to help address the affordable need.

3.22 It should be stressed that these final figures are not targets for affordable house building but a check to understand likely future demand. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, such as extra care provision. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties.

Housing Land Supply

3.23 The Places for Everyone Housing Land Supply (PfE HLS) forms a key component of the evidence base to support the delivery of housing to meet adopted housing targets set through the Places for Everyone plan and assesses the supply of housing land against housing requirements.

3.24 Each of the nine districts has carried out their own assessment of housing land availability and prepared their own Strategic Housing Land Availability Assessment (SHLAA). The PfE HLS brings together information from each of the nine districts to identify the total housing land supply across the plan area.

3.25 The districts have compiled their baseline supply with a base date of 1 April 2020. In order to reflect the start of the plan period moving to 1 April 2021 and in order to avoid delays in plan preparation which would be required for all districts to produce a 2021 SHLAA, a deduction has been made from the April 2020 land supply to account for housing completions in 2020/21. This is based on the target proposed for 2020/21 in the October 2020 Publication GMSF. Manchester have also prepared an interim update to reflect their need to deliver a 35% cities and urban centres uplift which is incorporated within the figures.

3.26 The table below summarises the existing housing land supply position as at 1 April 2021, based on the information presented the in Places for Everyone Housing Land Supply Statement. Note that this excludes the allocations proposed through the Places for Everyone plan.

Table 3.4: Existing housing supply summary

District	Brownfield	Greenfield	Mixed	Allowances	Total 2020-2037	Estimated completions 2020/21[1]	Total existing supply 2021-2037
Bolton	10,686	2,469	-	2,021	**15,176**	604	**14,672**
Bury	3,056	424	362	261	**4,103**	187	**3,916**
Manchester	49,455	2,591	9,676	805	**62,527**	2,951	**59,576**
Oldham	7,712	1,276	1,410	557	**10,955**	330	**10,625**
Rochdale	5,518	2,836	426	-783	**7,997**	569	**7,428**
Salford	30,634	2,137	1,473	1,959	**36,203**	1,680	**34,523**
Tameside	5,017	755	585	576	**6,923**	281	**6,642**
Trafford	12,293	2,568	824	777	**16,462**	591	**15,871**
Wigan	10,769	6,403	68	756	**17,996**	864	**17,132**
PfE total	135,140	21,459	14,814	6,929	**178,342**	7,957	**170,385**

3.27 The full details can be found in Appendix A: 'Places for Everyone Housing Land Supply Statement'. This sets out how PfE HLS summary has been carried out and presents the findings of the assessment.

GMSF Strategic Viability Report Stage 1 (SVRS1)

3.28 As part of preparation of the October 2020 GMSF a Strategic Viability Assessment of the Spatial Framework (VASF) was prepared by Three Dragons to test whether the policy requirements in the GMSF would threaten the development viability of the plan as a whole. This was published in September 2020 as part of the evidence base accompanying the GMSF. The evidence underpinning the report was collected during 2019 and early 2020. A subsequent addendum was prepared in June 2021. It is too early to determine what the impact of the Covid19 pandemic will be on the construction industry, house prices, build costs and overall viability in the medium to

[1] Estimated completions 2020-21 have been deducted from the supply based on the target for 2020-2021 as presented in the GMSF October 2020

long term period of the plan and the conclusions of the report reflect the pre Covid19 situation. The conclusions of the SVRS1 are summarised below.

3.29 For the housing land supply it tests various typologies representing the land supply. The VASF has employed a range of data sources to inform the values and costs used in the testing. This included bespoke analysis of new house prices across Greater Manchester which identified five broad value areas with differing values ranging from £3,712 pre sqm for flats and £3,722 per sqm for terrace houses in the highest value area (VA1) to £1,803 and £1,819 respectively in the lowest value area (VA5).

3.30 The residual values of a set of notional development typologies were calculated using the Three Dragons toolkit – an excel based model designed for this type of analysis and used across a number of similar viability studies. Some 20 basic typologies, ranging from 1 to over 1,000 dwellings, were tested. The typologies were representative of the types of sites likely to be developed over the life of the GMSF and were at various densities with different mixes of flats and houses.

3.31 The testing undertaken took into account the policies in the draft plan and future policy changes announced by government. They included the costs of biodiversity net gain, adaptable and accessible dwellings, Future Homes standards, provision of electric charging points, anticipated transport costs as well as an allowance for the costs of meeting planning obligations e.g. for the provision of schools and community infrastructure where applicable.

3.32 Through the plan, the nine districts seek to provide their share of the 50,000 affordable housing units across Greater Manchester but does not include a percentage target for the provision of affordable housing on housing sites. Whilst plan policies of the 9 local authorities do have policies for securing affordable housing, these do vary between authorities. Therefore it was considered important to test the potential impact on viability of on-site provision of affordable housing with a varied percentage and mix of types of affordable housing. This was tested at up to 20% of dwellings depending on the value area and site type.

3.33 As well as sale-led general needs residential schemes, the SVRS1 included analysis of the viability of build to rent developments (PRS), specialist housing schemes for the elderly and student housing.

3.34 With 100% market housing, on sites of up to 1,000 dwellings in the higher value areas (VA1 & VA2), residual values are strong, and schemes are generally viable. The exception is high-density city centre schemes when tested as standard market sale. However, when tested as PRS these typologies are viable. This reflects the longer-term view of investment that is found with PRS.

3.35 Similar conclusions apply in the mid-low value bands (VA3) although the picture here is more mixed and some typologies are not viable with higher cost scenarios (e.g. higher build costs associated with taller buildings), but most are still deliverable as 100% market schemes.

3.36 In VA4 and VA5, with the lower market values, delivering viable policy compliant development depends on the typology in question. In VA4 it is the smaller schemes (say up to c 75 dws) that are viable, with the larger schemes not as viable unless the developer return is reduced. In VA5 none of the tested schemes are viable until developer return is reduced, when smaller sites do become viable (up to c 75 dwellings), however the larger sites remain not viable even with the reduced developer return. However, the local authorities and development industry reported that schemes were proceeding despite the viability testing indicating otherwise. There can be many reasons why this occurs including where the developer and/or landowner requires a lower return than used in the testing or with a very specific form of development with an optimum mix and sales point, targeting specific markets that enable delivery but that may differ from the standard mix assumptions assumed in the testing.

3.37 Nevertheless, improving the overall viability in VA4 and VA5 will require either improvements to the market, lower costs or extra public sector support. It is not the policy requirements of the plan that are at the root of the lack of viability, it is primarily a function of the low market values in these parts of the plan area.

3.38 When affordable housing is introduced to the typologies tested (up to 20% as a mix of affordable rent and shared ownership) most typologies were found to be viable within VA1 -VA3. However, typologies tested in VA4 and VA5, cannot afford to deliver any affordable housing using the current assumptions.

3.39 The typologies with over 1,000 dwellings are all located within or adjacent to Manchester City Centre, where values are amongst the highest across the plan area. The large site typologies were all viable at 100% market housing and, depending on the type of development, could support affordable housing; the percentage depending on value area

3.40 The other types of residential development including specialist provision for older persons and others needing sheltered and extra care facilities and student accommodation are generally viable and the policy requirements can be met.

3.41 The underlying message of the viability testing is that most development types can meet the policy requirements of the draft plan in the medium to high value areas (VA1-3). However, in low value areas of the plan area, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft plan. Furthermore, only about one fifth of the 50,000 units of affordable housing for Greater Manchester (of which Places for Everyone will deliver their share) is capable of being delivered though mixed tenure, s106, development. GMCA and its partners will need to seek alternative forms of development and additional public sector funding.to meet the affordable housing target.

Strategic Viability Stage 1 Addendum – June 2021

3.42 In light of the decision by Stockport Council to withdraw from the GMSF and the decision by the remaining nine districts to progress the Places for Everyone Plan, Three Dragons were asked to review the viability assessment to ascertain the impact of Stockport no longer forming part of the plan area, along with further consideration of the impact of Covid-19.

3.43 A review of the value areas was carried out, and concluded that the removal of Stockport would only have a minor impact on average values and value areas, and the changes were not at such a scale to necessitate a wholesale review of the base data.

3.44 The latest house price values and building costs have been reviewed, and it has been shown there has been a steady rise in values and decrease in costs since the base work was undertaken in 2019. This implies that viability would have improved if the typologies modelled for the original study were considered again now. However, given the uncertainty about the future, with no consistency between the available forecasts, it is considered too early to properly assess the impact of Covid-19 on the housing market and that it is prudent to continue to rely on the analysis based on the pre Covid situation. However, with time this should be revisited, when more information will be available.

3.45 The policies within Places for Everyone replicate those already set out in the GMSF, and as a result were not revisited in the Addendum. The SHLAA 2020 data (excluding Stockport) has been reviewed and found that the spread of sites by value area and size is broadly similar. In terms of the type of site, there is a slight increase in brownfield sites with a decrease in mixed sites, with some shift in site sizes for greenfield and mixed use sites. There have been limited changes in terms of the mix of houses and apartments. The review has found that whilst there have been some small changes in terms of proportions of different types of development within the supply, the typologies identified in SVR remain valid and broadly reflective of the types of sites likely to come forward during the plan period.

3.46 Whilst it is not proposed to update the viability testing, on the basis of the review of the impact of Stockport no longer being included, the addendum identifies a need to recast the results and analysis due to the change in proportions of different site types. This is to enable us to come to a view as to whether the plan policies are still broadly deliverable and/or what interventions maybe required to enable development to come forward to meet housing needs.

3.47 The outcomes of the analysis are that the overall rate of viability has increased slightly from 66% (based on the SHLAA18 and including Stockport) to 68% (based on SHLAA2020 and excluding Stockport). The small increase is due to the different spread of sites that are included within SHLAA20 as opposed to SHLAA18.

3.48 An analysis of the viability position for the 2020-2025 baseline land supply has also been carried out using the SHLAA20 data (excluding Manchester's interim update) and testing results from viability assessment and concludes that the anticipated supply is around 62,000 with c43,000 dwellings viable (69%).

3.49 Whilst the improvement set out above for the viability of the total SHLAA supply is positive, the key messages from SVRS1 remain valid and continue to be important in considering the wider delivery of Places for Everyone. In particular the Delivery Topic Paper illustrates the measures that have been taken to meet housing need, especially in areas and types of sites that are difficult in terms of viability, without public sector support.

3.50 It should be noted that the additional sites identified by Manchester City Council to meet required increases in housing requirements have not been incorporated in the addendum. There are around 120 new sites and an increase of c5,000 units. Many of these are centrally located within the Core Growth Area. At this stage these sites have not been tested, however it is likely they will have a similar profile to typologies already considered. It is recommended that these will need to be reviewed in further detail prior to Examination.

3.51 It is important to note that these supply figures and viability position do not include the allocated sites. These are subject to a separate review – set out in 'Strategic Viability Report Stage 2 Allocated Sites Viability Report Amended June 2021'.

GMSF Strategic Viability Report Stage 2 (June 2021 update)

3.52 Each of the site allocations identified in the Places for Everyone plan has been appraised. An updated report has been prepared to reflect changes to sites from the 2020 GMSF to PfE 2021, which includes the removal of the Stockport sites and altered capacities on five sites in Oldham and Salford. The results of the appraisal show that the majority of sites are viable (23 or 60%), with a positive residual value above the benchmark. The remaining sites (15) will require public support to proceed if the assumptions set out in the sensitivity tests are not forthcoming.

3.53 In terms of the sensitivity tests most of the sites either continue with, or are improved sufficiently to show they are viable. Of the remaining unviable sites several could move to an improved status should the developer be willing to accept a slightly lower blended return of around 15-17%.

Housing Delivery Test

3.54 The Housing Delivery Test is an annual measurement of housing delivery in the area of relevant plan-making authorities (non-metropolitan districts, metropolitan boroughs, London boroughs and development corporations with plan-making and decision making powers).

3.55 The Housing Delivery Test is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the areas covered by the Housing Delivery Test, over a rolling three year period.

3.56 The planning policy consequences of not meeting the Housing Delivery Test are set out in the revised National Planning Policy Framework (NPPF). Depending on the level of delivery, these are:

- The authority should publish an action plan if housing delivery falls below 95%;
- A 20% buffer on the local planning authority's 5 year land supply if housing delivery falls below 85%; and
- Application of the presumption in favour of sustainable development if housing delivery falls below 75%, subject to the transitional arrangements set out in paragraph 215 of NPPF.

3.57 These consequences apply concurrently, for example those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published. The relevant consequence for any under-delivery will then be applied. Should delivery meet or exceed 95%, no consequences will apply.

3.58 The Housing Delivery Test results are published annually. The latest published information is for 2020 and is shown below for the nine districts within the Plan area.

Table 3.5: Housing Delivery Test results

District	Housing Delivery Test 2020 Measurement	Housing Delivery Test 2020 Consequence
Bolton	66%	Presumption in favour of sustainable development, 20% buffer and action plan
Bury	52%	Presumption in favour of sustainable development, 20% buffer and action plan
Manchester	133%	None
Oldham	80%	20% buffer and action plan
Rochdale	170%	None
Salford	219%	None
Tameside	89%	Action plan

District	Housing Delivery Test 2020 Measurement	Housing Delivery Test 2020 Consequence
Trafford	61%	Presumption in favour of sustainable development, 20% buffer and action plan
Wigan	137%	None

3.59 As noted in the table above a number of districts are required to produce a Housing Delivery Test action plan. The aim of action plans is to identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery. Those districts required to do so have published action plans on their websites. These action plans identify a wide range of measures to improve levels of delivery including:

- Reviewing and improving the residential planning application process;
- Maximising land supply opportunities to deliver new homes, including brownfield sites, town centre opportunities, land in public ownership and small sites;
- Improving monitoring in relation to housing supply and delivery;
- Implementation of relevant strategies and masterplans, including Housing Strategies and major regeneration opportunities;
- Maximising opportunities for funding to deliver new homes e.g. Housing Infrastructure Fund;
- Establishing delivery groups and forums to proactively identify and support the delivery of new homes; and
- The delivery of supporting infrastructure.

3.60 A key measure identified within the action plans is working towards the adoption of the Joint Development Plan as well as up to date Local Plans. This is identified as one of the most effective ways of boosting housing delivery over the longer term.

3.61 The Plan includes stepped targets over the plan period. The work of each of the local planning authorities in terms of housing delivery will be key to ensuring that these stepped changes in delivery rates are achieved, utilising the measures outlined above, and these will be reviewed regularly as part of the Housing Delivery Test process.

4 Summary of consultation

First Draft – October 2016

4.1 The first draft of the GMSF was published for public consultation for 12 weeks in October 2016. A summary of the issues that were raised during the consultation on the housing policy and SHMA is listed below.

Housing (Policy G5)

4.2 The main issues raised were:

- The split of housing development across Greater Manchester is not equal with significantly less in the south. It should be made clear how these housing targets have been set, and how this represents a sound, suitable and sustainable approach to growth across the whole of Greater Manchester.
- Comments from surrounding districts, such as High Peak who pointed out that they had a Memorandum of Understanding with Tameside and Stockport that there would be no requirement from them to contribute to any shortfall within Greater Manchester.
- It is not clear how the phasing of new housing will be calculated. Sites with existing good infrastructure should be delivered first.
- Support for the proposed housing requirement, recognising the level and need for housing in Greater Manchester to support growth.
- The proposed housing requirement is too low and insufficient to address longstanding issues of historic under-supply and support economic growth. Planning at this level will exacerbate the current shortage of land, deepen the housing crisis, fuel affordability problems and constrain economic growth prospects and social mobility. It does not represent a sustainable option when considered against reasonable alternatives and therefore is unsound as there is no systematic evidence of the deliverability of this land. A higher housing requirement is needed.
- The proposed housing requirement is too high and represents an untenable spike in population growth and household formation. The assumptions made have little or no prospect of occurring during the specified plan period and the house building industry have little or no prospect of achieving the level of housing completions

suggested as being needed.

- The proposed housing requirement is predicated on an erroneous methodology, and it must be remedied by a reassessment of both the jobs and housing evidence base.
- There needs to be more of a focus on use of existing housing stock. There is none, or very little, evidence of the analysis of empty homes across Greater Manchester and this should be addressed as a key issue.
- Many assumptions that expensive housing will be built in favour of affordable housing. It was assumed that this expensive housing would be built on Green Belt rather than there being a focus on more affordable homes on brownfield sites.
- There should be a clear policy of brownfield land being developed first before greenfield land and Green Belt. Any Green Belt development should be a last resort and if required, clearly allocated to provide social housing.
- Current physical and social infrastructure cannot cope with the proposed scale of development. The proposed housing development required cannot go ahead before infrastructure is put in place.
- There was no detail on the tenure mix of any new housing and there should be a clear statement of the overall mix required. A strategic plan should inform the direction of the required tenure mix within local plans.
- There is too much emphasis on the building of apartments rather than houses, in particular family homes, especially in Manchester where house types need to include starter homes; homes for families, including inner-city housing that is suitable for family living; homes for disabled people; and accessible housing to allow older people to 'age in place'.
- The housing calculations had been undertaken before the UKs decision to leave the EU had been agreed and therefore Brexit will seriously undermine the proposed housing projections. As a consequence of the perceived reduction in net immigration the amount of land required for new household formation will be less and therefore Brexit calls into question the housing figures and whether the release of Green Belt will be required.
- There is a need for specific housing to meet the needs of the older population;

apartments are rarely designed to meet the needs of older people. There is evidence to suggest that some older people would prefer to down-size from housing in the suburbs and move to the city centre in order to benefit from living in proximity to Manchester's vibrant city centre culture. The city should be designing suitable age-friendly housing in the city, including in the city centre to stop the net outflow of older people as well as to encourage downsizing.

- New housing development should support good health. GM needs to eliminate bad housing conditions in new developments, overcrowding, insecurity of tenure and poor physical conditions that all contribute to a risk to health. Housing needs to be adaptable to be able to accommodate a range of people to allow for changing demographics of the population.

4.3 The 2019 draft of the GMSF was published for public consultation for 8 weeks in January – March 2019. A summary of the issues raised and responses to them is set out in the Statement of Consultation (October 2020). The key issues in relation to housing are summarised below.

Housing Need

4.4 Many respondents commented on the methodology used to calculate Local Housing Need. Some respondents were of the view that the Government standard methodology should not be used, that the 2016 Sub National Household Projections should be used which would result in a lower level of need, or that Greater Manchester should calculate its own housing need instead of using the standard method. Views were expressed that housing need should be met by bringing empty properties back into use. Others were of the view that the Government methodology provided a starting point but that Greater Manchester’s need was higher than the LHN as set out in GMSF, and that a further uplift was required to support economic growth and increase affordable housing delivery.

Housing Market Areas

4.5 Some respondents were of the view that there is more than one housing market area within Greater Manchester and treating it as one will lead to an under-provision of homes within certain districts.

House Types

4.6 Concerns were raised that the GMSF does not provide an adequate range of dwelling types and sizes to meet the needs of different groups in the Greater Manchester community, and that there was an over-reliance on the delivery of apartments rather than family housing. Comments were made that a range of suitable house types must be provided to address the needs of an ageing population.

Housing Density

4.7 Some respondents were of the view that the proposed housing densities are inflexible and unrealistic, and would not be achievable whilst also meeting space standards and open space provision.

Housing Supply

4.8 Responses were received on the supply of housing land, with some of the view that it will fail to deliver the overall housing requirement or meet the local housing needs of each respective district. Some questioned whether the identified supply would deliver the objective of boosting northern competitiveness, or felt that each district should meet its own housing needs.

Housing Delivery

4.9 Concerns were raised around the deliverability of the proposed housing supply and the view expressed that a larger buffer than proposed should be identified as a contingency to protect against the likelihood that sites under construction or with planning permission do not deliver as anticipated or at all. It was suggested that the reliance on brownfield sites and apartments in the Core Growth Area, and large Green Belt sites with substantial infrastructure challenges would make delivery and demonstrating a five year supply more challenging.

Affordable Housing

4.10 Concerns were raised that the overall need for affordable housing will not be met through the GMSF. Respondents felt that the areas of worst affordability had targets below their need, and that setting an overall requirement that goes no further than the standard method would compound affordability issues. The challenges of delivering affordable housing, particularly on previously developed land were raised. It was suggested that proposing family homes in areas of strong demand would support the delivery of affordable homes, but also that allocating land to build more homes will not lower house prices in itself.

Safeguarded Land

4.11 Some respondents commented that the post-2037 supply was insufficient to meet longer-term development needs, and that safeguarded land should be identified.

Stepped Housing Requirement

4.12 Some respondents considered that the GMSF should plan to meet Greater Manchester's housing needs evenly throughout the plan period, not towards the end of it.

Consultation on the draft GMSF March 2019

4.13 The second draft of the GMSF was published for public consultation for 8 weeks in January – March 2019, and the responses received informed the production of the GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.

4.14 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. The previous consultations therefore remain valid in the preparation of Places for Everyone.

4.15 A summary of the issues that were raised in relation to the housing policies are listed below.

4.16 There were 3,322 comments received on the Homes for Greater Manchester chapter. Many respondents commented on the methodology used to calculate Local Housing Need. Some respondents were of the view that the Government standard methodology should not be used, that the 2016 Sub National Household Projections should be used or that Greater Manchester should calculate its own housing need, whilst others were of the view that the Government methodology provided a starting point but that Greater Manchester's need was higher than the LHN as set out in

GMSF.

4.17 Some respondents were of the view that there is more than one housing market area within Greater Manchester and treating it as one will lead to an under-provision of homes within certain districts. Concerns were raised that the overall need for affordable housing will not be met through the GMSF, the GMSF does not provide an adequate range of dwelling types and sizes to meet the needs of different groups in the Greater Manchester community and that the proposed housing densities are inflexible and unrealistic.

4.18 Responses were received on the supply of housing land, with some of the view that it will fail to deliver the overall housing requirement or meet the local housing needs of each respective district. Some respondents considered that each district should meet its own housing needs.

4.19 Concerns were raised around the deliverability of the proposed housing supply and the view expressed that a larger buffer than proposed should be identified as a contingency to protect against the likelihood that sites under construction or with planning permission do not deliver as anticipated or at all.

4.20 Some respondents considered that the GMSF should plan to meet Greater Manchester's housing needs evenly throughout the plan period, not towards the end of it.

4.21 More detailed comments in relation to specific elements of the policies are set out below:

Housing Need: Planning for housing must be based on the latest evidence, and this means the 2016-based household growth projections should be relied upon.
• The overall GMSF housing need numbers are too high; the ONS revised their household growth projections down in 2016; these result in Greater Manchester having a housing need of 154,000 homes as oppose to the projected 201,000. • If housing need was calculated using the 2016-based household growth projections, and adjusted to reflect realistic economic growth, then less Green Belt land would be needed for housing and jobs.

- The standard method for assessing local housing need (LHN) is fundamentally flawed as it is based on projections rather than forecasts; projections do not take account of Government policy, i.e. the United Kingdom's decision to exit the European Union and the effect this will have upon net migration and household growth projections.
- GMCA should use an alternative approach to calculate local housing need, one that uses the latest evidence and is underpinned by more realistic assumptions about future demographic growth.
- Housing need should be met by bringing empty properties back into use and incentivising landlords to let/sell the properties they own but have chosen to leave vacant.

Housing Need: The annual need for 10,580 dwellings per annum (201,000 up to 2037) does not reflect the full objectively assessed needs of Greater Manchester (actual housing need is higher than Government's standard method indicates).

- The GMCA have not taken sufficient account of any factors that would have led to a higher housing need figure being calculated, e.g. prospective housing deals and planned strategic transport infrastructure improvements.
- The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. The method does not attempt to predict the impact of changing economic circumstances on housing need.
- The housing need figure should be further uplifted to support economic growth and increase affordable housing delivery.
- GMCA have interpreted the minimum annual housing need figure as the housing requirement, rather than as the first step in a process of deciding how many more homes actually need to be planned for (the housing requirement).
- The Framework should have explained the relationship between the local housing need figure and the housing requirement figure (i.e. how LHN was translated into a housing requirement figure for strategic policy-making purposes).
- The GMSF is unclear about the exact housing requirement; it appears as if the requirement (201,000) is slightly lower than assessed need (201,077).
- Housing need has not been assessed prior to, or separate from, considering land availability and how much of the overall need can be accommodated outside Green Belt.
- The level of housing proposed will not be sufficient to accommodate the workforce created through the jobs growth forecast.

- The GMSF is planning for fewer homes in the hope that labour needs will be met by existing residents, i.e. through increased rates of participation and residents working longer. This assumes that existing residents hold the qualifications and skills required by the sectors forecast to grow.
- Economic growth will fuel an increase in household formation rates by providing younger people with a better prospect of accessing the housing market.
- The previous objectively assessed need figure of at least 227,200 new homes over the plan period was a more appropriate assessment of local housing need.
- Household projections do not take account of how many people may want to form new households, and are not a measure of how many houses would need to be built to meet housing demand. Household projections simply show what would happen if past trends in household formation continued. They do not take account of where homes have been needed in recent years but have not been available, such as in Trafford and Stockport.
- Building fewer homes in Greater Manchester than needed has prevented households from forming, which has in turn lowered the future household projections for Greater Manchester, misrepresenting and underplaying Greater Manchester's actual housing need.
- The 2014-based projections are calculated on a trend period which experienced low levels of housing development (5,000 units pa); which inevitably constrained household formation. The Framework anticipates there will be around 9,200 housing completions on average up until 2023 and 11,070 from 2024, meaning future household projections will be far higher than what is being planned for in the GMSF. GMCA should therefore be planning for a greater level of homes than past trends would suggest are needed.
- The level of development proposed in, particularly in areas such as Stockport and Trafford, is too far below local housing need to be justifiable.
- Although recent completions have been substantially below what is needed in areas such as Stockport and Trafford, there is no evidence to suggest that this has caused people to move to northern districts with lower house prices.
- There is no quantitative assessment of the future need for care facilities and student accommodation.
- Although the housing requirement is being treated as a minimum, rather than a cap, it must be expressed as a minimum annual requirement within the policy.

• The GMSF should aim to allocate land with the capacity to deliver in the region of 12,500 to 15,000 new homes per annum rather than 10,580. This level of housing provision would be more commensurate with the level of economic growth advanced by the plan
• **Housing Market Areas:** There's more than one housing market area within Greater Manchester
• The GMSF seeks to justify Greater Manchester as one strategic housing market area, primarily based upon the level of self-containment that exists both in terms of home moves and travel to work patterns across the wider city region, however no analysis is presented to substantiate this conclusion. • Treating Greater Manchester as a single housing market area will lead to an under-provision of homes within certain districts. • Relying on certain districts to meet the housing needs of other district's (without accounting for house search/move patterns and travel to work flows across Greater Manchester) could result in the housing needs of workers employed in those 'other' districts not being provided for. • The GMSF correctly acknowledges that there are significant differences in housing demand and supply across different districts, which affects house prices and rates of change in house prices. • Despite national planning guidance outlining that housing market areas can be defined by analysing the key functional linkages between the places where people live and work, and the relationship between housing demand and supply across different locations (using house prices and rates of change in house prices), the GMSF still contends that Greater Manchester is a single housing market area.
• **House Types:** The GMSF does not provide an adequate range of dwelling types and sizes to meet the needs of different groups in the Greater Manchester community.
• Apartments will not satisfy the demands of Manchester's growing population for larger family homes. • The GMSF is over-reliant on the delivery of apartments. This will result in a significant over-supply of apartments and an under-supply of houses; in direct conflict with demographic and market evidence. • The evidence base for the GMSF does not identify that 60% of housing need is for apartments and the GMSF's household projections wrongly assume that past trends

of households forming within apartments will continue. GMCA should consider alternative forecasts that are less likely to translate into the same level of demand for apartments.

- The GMSF underplays the need for family housing in order to limit the release of land suitable to meet those needs (i.e. greenfield and Green Belt sites).
- The GMSF fails to plan for the retention of the currently apartment dwelling city-centre based workforce.
- The mix and distribution proposed ignores the evidence about the shortcomings of the current housing stock and the pressing need to broaden the choice and range of homes available, i.e. by providing larger family housing in locations that will attract and retain skilled workers.
- A relative oversupply of apartments will make family homes less affordable (constraining the supply of family housing will compound competition for family homes in desirable areas, thereby driving up prices, and forcing skilled workers to leave Greater Manchester in order to access affordably priced family housing within a reasonable commuting distance of their place of work).
- It is highly likely that the current trend of migration to Cheshire East and High Peak will therefore continue as people look for larger executive homes in attractive locations.
- Giving preference to using previously developed land to meet housing needs will inevitably lead to a concentration of high-density flatted developments.
- It is essential that housing quantity is not at the expense of design quality.
- Affordable housing needs should be met on-site to help create mixed and balanced communities.
- The GMSF should be allocating more greenfield sites in areas capable of meeting the housing type needs of current and future families (i.e. in strong housing market areas that comprise lower density neighbourhoods).
- The ambition to accommodate smaller households, families, and an ageing population in apartments is not based on any reasonably justifiable evidence.
- A range of suitable house types must be provided if our ageing population is to be incentivised to downsize and free up larger properties for family occupation.
- Ensure that there is the offer to older people to remain within their neighbourhoods and include age friendly housing on all new developments so that the people who

move in now can have the opportunity as they age to move within their local community • For an ageing society a wide range of housing options will be needed across both private and social housing sectors, from retirement properties, to supported housing options such as extra care, to innovations such as co-housing • Older people are more likely to be living in non-decent homes. Given the proportion of older stock across GM, it is important that this is addressed within the GMSF, working with districts to target these poor quality homes that have such a detrimental effect on people's health • Whilst there is reference to the rapid growth in the number of older people living in GM over the plan period, the remainder of the GMSF pays little cognisance to this in prioritising investment in homes and services for this demographic. • The commitment to Part M (2) of building regulations as new minimum accessibility standards are important steps in ensuring that new homes in the city-region will support ageing in place, and specific commitments to affordable older people's accommodation in a number of the development sites is a welcome acknowledgement that housing inequalities are not limited to younger people. • There was also support that the GMSF recognises that high quality, 'age-friendly' neighbourhoods are important in creating sustainable communities that enable people to start, live and age well • Homes should be built to a minimum standard but it is hoped that Greater Manchester would be more aspirational than the National Design Space Standards which do not include adequate storage or circulation space. There is a real opportunity to create a 'GM Housing Standard', working with local housing providers and developers. • The GMSF can only introduce nationally described space standards and/or optional requirements if they are evidenced in accordance with National Planning Practice Guidance. • Overall the GMSF must plan for enough homes, of the right type, in the right locations.
Housing Density: The proposed housing densities are inflexible and unrealistic.
• Density ranges are distorted by the proportion of development that is expected to be delivered as apartments within city and town centre locations. • The proposed densities are not considered achievable once associated uses, including access roads within sites, private garden space, car parking areas,

incidental open space, landscaping, and children's play areas, have been accounted for.

- The density policy should be flexible enough to allow proposals that are responsive to site specific circumstances.
- It is questionable whether sale values on marginally viable brownfield sites will support the cost of building more densely.
- Density assumptions have led to an overestimation of the level of development that can be yielded from sites identified within the baseline housing land supply. In turn this has led to an under-estimation of the amount of housing needing to be allocated on greenfield Green Belt land.
- Space standards are less likely to be achieved within the parameters of the density policy.
- Open space provision should not be compromised in order to achieve higher densities.

Housing Supply: The supply of housing land will fail to deliver the overall housing requirement or meet the local housing needs of each respective district. (The GMSF must supply housing that people actually need and can afford, in areas where they will want to rent or buy).

- The aim of the GMSF must be to boost northern competitiveness in its own right, not by neglecting housing needs elsewhere in terms of the overall number and type of properties to be supplied.
- The cumulative housing supply for the northern districts exceeds minimum need by just 0.1% (for example there are no new family housing developments in Bolton). This is insufficient if the GMSF's objective of boosting northern competitiveness is to be achieved, particularly given that certain northern districts are forecast to experience job losses.
- Relative to existing housing stock, the level of housing supply proposed within southern districts is actually higher than northern districts; undermining the strategy to boost northern competitiveness.
- As a minimum the housing supply proposed should meet full standard method-based housing need in each respective district, regardless of any planned over provision in areas where the GMCA is seeking to diversify local housing markets and stimulate economic growth.

• To seek to constrain supply within the strongest housing market areas and instead rely on weaker market areas to achieve that delivery is illogical and unsound. • The GMSF is relying on sources of housing supply that have consistently failed to deliver and that could have already come forward (prior to the GMSF) had they been as developable and deliverable as the GMSF now claims they are. • There is simply not enough suitable, viable and available brownfield land to meet Greater Manchester's housing needs to the extent that is being proposed through the GMSF. • Whilst it is appropriate for the baseline land supply, site availability, suitability, and sustainability, to influence the spatial distribution of development, this must be correlated to the areas with the greatest housing need, unaffordability, viability, and likelihood of delivery. The spatial pattern of housing distribution does not align with these considerations. • Housing supply will barely keep pace with the rate of household formation (and will most likely be overtaken by it). • The GMCA needs to set out clearly when each of the allocated sites will start to deliver housing within the plan period (and at what rate per annum). • National planning policy requires planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; GMCA have identified nearly 32%. This scale of delivery from small sites is unlikely to be achievable without a significant increase in small to medium sized developers, and will also compromise affordable housing delivery. • The supply of large numbers of new homes can often be best achieved through planning for larger scale development; major strategic sites can yield the critical mass of development required to financially support the provision of new transport infrastructure, schools and community facilities in advance of occupation, as well as affordable housing
Housing Delivery: There is a lack of certainty around the deliverability of the proposed housing supply (both in terms of the rate of delivery anticipated and the total amount of completions assumed).
• The GMSF incorrectly assumes that all the sites that make up the baseline housing land supply will be implemented and delivered in full and at the completion rates anticipated.

- The suitability, availability and achievability of the baseline housing land supply remains untested; i.e. in accordance with national planning guidance with respect to viability, constraints (including their potential to be mitigated), potential impacts, legal/ownership impediments, attractiveness to market, and landowner intentions.
- Overall there is a lack of robust evidence to provide sufficient certainty that the baseline land supply and housing allocations proposed will deliver as projected.
- There has been little if any engagement with developers, landowners and other delivery partners, despite the requirement for their involvement at the earliest stages of the plan making process.
- Site yields have been overestimated; insufficient regard has been given to physical, environmental and financial constraints.
- A proportion of the supply is currently in alternative use, for example as employment floorspace, and is not therefore available for residential development.
- The GMSF should provide a larger buffer than proposed (i.e. additional total deliverable housing site capacity over and above the housing requirement) as a contingency to protect against the likelihood that sites under construction or with planning permission do not deliver as anticipated or at all; that windfall levels are lower than expected, future demolitions/changes of use/conversions have been under-estimated, existing allocations remain unimplemented, sites with expired applications remain unconsented, and the GMSF allocations are not delivered in line with expectations. The total land supply figure of 218,549 (9% greater than minimum local housing need) is insufficient to protect against the eventualities outlined above.
- The reliance on brownfield land and town centre sites makes it far more likely that the rate of lapsed planning permissions will be higher than typically seen elsewhere and that delivery will be delayed or fail to materialise at all (due to the cessation of existing uses, and complications with land assembly, site clearance and remediation).
- The GMSF does not provide sufficient clarity about the scale or type of development that is expected to come forward in each town centre; or any evidence about its deliverability.
- Around 29% of the housing requirement will be delivered in the core growth area (principally as apartments); the GMSF is thereby dependent on a small geographic area and segment of the housing market to deliver a significant proportion of Greater Manchester's future homes.

- The GMSF assumes unprecedented levels of brownfield land delivery and that the rates assumed will be sustained throughout the plan period.
- There is a significant over-reliance on brownfield sites with no planning application status being deliverable.
- Unallocated and/or unpermitted sites should not be considered deliverable (i.e. available and suitable with housing achievable within 5 years), and allocated/permitted sites should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- Large and complex Green Belt releases will make demonstrating a five year supply of deliverable housing sites more challenging. This can be addressed by allocating more smaller deliverable greenfield Green Belt sites that are within the control of a single housebuilder and do not require substantial infrastructure or public funding support.
- The GMSF is unclear whether the five year housing land supply requirement will be applied on a district or GMCA basis.
- Each Greater Manchester local planning authority must maintain a sufficient supply of deliverable housing sites (against its five year housing supply requirement including appropriate buffer) throughout the plan period; individual authorities should not rely on other GM authorities to deliver housing on their behalf.
- The GMSF's approach to housing delivery is driven by politics rather than evidence.
- The expectations for delivery on brownfield land must be realistic, and reflect what developers will actually have the capacity and desire to deliver.
- The GMCA is proposing to deliver an excessive supply of apartments simply in order to achieve higher densities and maximise brownfield land usage, thereby minimising the amount of greenfield and Green Belt loss necessary to meet the housing requirement. Although laudable, this will nevertheless be to the detriment of families wanting to live in houses located outside town and city centre locations.
- The GMSF significantly overestimates the capacity and deliverability of the baseline supply of housing land, and therefore significantly underestimates the level of Green Belt housing allocations required.
- Proposing to deliver homes (of a type and size) that will not match housing needs, in districts where demand and growth has generally been lower, whilst restricting growth in locations where demand has historically been higher, is considered unsound and will, inevitably through a lack of consents, lead to a significant under-delivery of housing, acute affordability issues, and planning by appeal (due to district's being

unable to demonstrate a five year supply of deliverable housing sites and the GMSF's policies for determining residential applications being deemed out-of-date).

- Make provision for the release of 'reserve Green Belt sites' (with release being subject to a specified level of under-delivery having occurred during the plan period).

Affordable Housing: The overall need for affordable housing will not be met through the GMSF

- The adjustment applied to local housing need to take account of affordability (an extra 1,218 homes per annum) will barely have an effect on the affordability of homes in Greater Manchester.
- The affordability adjustment has been formulated to address the affordability of areas where house prices are greater than four times local average earnings (areas such as Stockport, Trafford and Bury). However, the GMSF disregards this and actually apportions less housing to these areas than they need as a minimum (i.e. the extra 1,218 homes per year are planned to be delivered in more affordable districts where new housing is needed less).
- The affordability ratio (house price to earnings) within each GM authority continues to worsen year after year placing greater pressure on the ability of the city's population to form households.
- Past rates of household formation were artificially suppressed by the failure to build enough homes within Greater Manchester that people could afford.
- Setting a housing requirement that goes no further than the standard method only serves to embed and compound current affordability issues (particularly in Bury, Trafford and Stockport where housing needs will be under-provided for).
- Projections of affordable housing need should reflect new household formation, the proportion of newly forming households unable to buy or rent, and an estimate of the number of existing households falling into affordable need.
- GMCA should look at the current affordable housing stock and assess whether it matches current and future affordable housing needs; and plan for any deficit to be met.

  In the last 5 years the majority of affordable housing was delivered by housing providers as opposed secured through planning obligation agreements.
- The Strategic Housing Market Assessment (SHMA) identifies a total net annual affordable housing requirement of 4,832 dwellings per annum across Greater Manchester. This represents a significant proportion of the total annual housing

requirement (46%), however the GMSF only plans for a minimum of 50,000 affordable homes (equating to just 25% of the total annual housing requirement).

- The 50,000 target falls short of the 85,000 households who were on a local housing register in 2016/17.
- It will be challenging to achieve any affordable housing on previously developed land given cost constraints and limited viability headroom (especially after the significant additional policy burdens proposed by the GMSF are accounted for).
- There is no evidence to demonstrate that 50,000 affordable homes are viable and deliverable across the sources of housing land supply identified.
- Almost 7% of the overall housing supply is comprised of sites yielding less than 10 units, which is below the threshold at which affordable housing contributions can be sought.
- It is likely that greenfield land will have to deliver a greater proportion of affordable homes to compensate for the lack of delivery on previously developed land.
- In order for Manchester's affordable housing need to be met in full it will be necessary to plan for at least an additional 2,200 affordable homes per annum across Greater Manchester (and around 243,000 homes in total).
- The GMCA should use Government's definition of affordable housing (as set out in national planning policy).
- A higher overall housing requirement would increase the prospect of delivering 50,000 affordable homes (because as it stands every site will have to deliver 25% affordable housing on average). Increasing the overall housing requirement would lower that proportional target, making it more achievable on a site by site basis.
- Proposing family homes in areas of strong demand would support the delivery of affordable homes
- Allocating land to build more homes will not lower house prices in itself, as prices are determined by the level of supply released for sale and the rate at which the housing market is able to absorb that supply (which is controlled and dictated by major housebuilders and the inflated prices they set for their homogenous housing products).
- Place affordable housing in areas with the most potential for future employment

Safeguarded Land: No safeguarded land is proposed (except for a marginal amount within Trafford).

- The post-2037 supply identified within the GMSF is insufficient to meet the longer-term development needs of Greater Manchester well beyond the plan period.
- The 'brownfield preference' strategy proposed by the GMSF is supported, but is likely to exhaust the supply of developable land within the urban area, meaning its contribution to meeting post-2037 housing needs is likely to be limited.
- Safeguarded land should be identified to ensure consistency with national policy and to establish Green Belt boundaries that will endure well beyond 2037.

Stepped Housing Requirement: The GMSF should plan to meet Greater Manchester's housing needs evenly throughout the plan period, not towards the end of it.

- The need for housing within Greater Manchester exists now and will continue to rise throughout the plan period.
- The introduction of a stepped housing requirement will increase pressure on the housing market, worsen affordability, and defer meeting needs until later on in the plan period.
- The stepped approach to housing delivery will lead to large deficits in each district's provision that will be far too great to address concurrently during the latter stages of the plan period.
- The GMSF proposes the delivery of just 9,200 dpa (dwellings per annum) in the first five years of the plan period (13% below the minimum 'starting point' housing need figure of 10,580).

GMCA have proposed a stepped trajectory to increase the chance that each respective district will be able to demonstrate a five year supply of deliverable housing sites. Stepped requirements are only appropriate if there is to be a significant change in the level of housing requirement between emerging and previous policies, and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

Response to comments

Housing Need

As expected by NPPF the housing need figure used in the GMSF 2020 has been derived using the standard methodology provided in NPPG for calculating local housing need. Government wants local authorities to have a clear and consistent understanding of the number of new homes needed in an area. Therefore, they devised a standard methodology to calculate a figure for 'local housing need'. The method was published in early 2019 and sets out the approach for calculating the minimum housing need for an area. The total housing need figure for Greater Manchester is worked out district by district and added together to give a Greater Manchester total figure. Under the current methodology the overall annual housing need for Greater Manchester is 10,534 homes per annum. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process

As expected by NPPF the housing need figure used in the GMSF 2020 has been derived using the standard methodology provided in NPPG for calculating local housing need. The total housing need figure for Greater Manchester is worked out district by district and added together to give a Greater Manchester total figure. Under the current methodology the overall annual housing need for Greater Manchester is 10,534 homes per annum. Over the lifetime of the GMSF (2020 – 2037) the total housing need for Greater Manchester is 179,078 homes. Further evidence regarding Greater Manchester's overall housing need is provided in the Strategic Housing Market Assessment (SHMA) 2020. Additionally further evidence has been produced in relation to the employment land targets within the GMSF and it is considered that sufficient housing land has been identified in the GMSF to meet Greater Manchester's needs up to 2037. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process. Through this process individual housing targets for each of the ten districts have been identified and sufficient deliverable land has been identified to meet these targets

Housing Market Areas

An update of the Strategic Housing Market Assessment has been published alongside the GMSF 2020. This provides full details in relation to defining the Greater Manchester housing market area. More than four out of every five households who move into a home in Greater Manchester already live there and almost nine out of ten working people who live in Greater Manchester also work in Greater Manchester. The document considers that whilst Greater Manchester has important and valuable relationships with neighbouring districts and further afield, it is reasonable to define it as a housing market area for strategic planning purposes.

House Types

The updated SHMA (2020) provides detailed evidence in relation to Greater Manchester's housing need. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need and to deliver a mix of size and type although the precise mix of dwelling type and size will be determined at the local level. The homes will be of good quality and design and will be accessible and adaptable and supported by amenities and necessary infrastructure

Housing Density

The GMSF seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. The density ratios proposed in the GMSF are considered to be realistic based on the land supply within these urban areas. Based on the assumptions made in the plan and the existing land supply, strategic viability evidence has been produced.

Housing Supply

Sufficient housing land has been identified in the GMSF to meet Greater Manchester's needs up to 2037. The land has been identified in a range of site sizes, predominantly on land within the urban area. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process. Through this process individual housing targets for each of the ten districts have been identified and sufficient deliverable land has been identified to meet the overall need of Greater Manchester and to deliver the overall strategy. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and therefore Greater Manchester has been lobbying the Government to secure funding to realise this ambition. As a result a number of schemes have secured funding from initiatives such as the Housing Infrastructure Fund and the Brownfield Land Fund

Housing Delivery

The GMSF 2020 represents the third round of consultation on the complete GMSF. In addition to these consultations, there has been engagement with developers etc. in the production of evidence such as the viability evidence. Past trends in completions up to

March 2020 would suggest that housing delivery in Greater Manchester can keep apace with the rates anticipated in the GMSF. Over the plan period more than a 15% buffer has been applied to the land supply. This is considered to be sufficient to not only provide adequate flexibility of sites but also to take account of the proportion of sites in the early years that may face challenges due to their brownfield land nature, the potential uncertainties arising out of Covid-19 pandemic in the early years of the plan and to ensure that the Green Boundary can endure beyond the end of the plan period. Given the strategic nature of the GMSF, specific sites are not identified within the urban area, these would be allocated as appropriate within district local plans, however the extent of the land supply can be seen on MappingGM which is where specific land supply data can be found for each district.

Stepped Housing Requirement

Introducing stepped targets is an appropriate mechanism to use in plan making. The factors for determining the stepped targets in Greater Manchester include the need to be realistic at the start of the plan period in terms of the level of masterplanning and infrastructure provision required for the larger more complex sites and also the need to take account of the challenges facing some of the urban land supply

Affordable Housing

The local housing need calculation (and therefore the affordability ratio) has been derived through applying the standard methodology. Further details in relation to housing need, including affordability can be found in the updated SHMA (2020) and the GM Housing Strategy sets out the approach to tackling the housing crisis. There are a variety of ways to deliver affordable housing. The emphasis in some parts of Greater Manchester may be on increasing the supply of social rented and in others shared ownership, affordable market rent and discount market sales may be appropriate. Although locally appropriate requirements will be set by each local authority, delivery of affordable housing has been taken into account as appropriate in the viability assessment work supporting this plan

Gypsy and Traveller Accommodation

The Greater Manchester authorities agreed to deal with matters relating to Gypsy and Traveller Accommodation through local planning documents, not a strategic document such as the GMSF

Safeguarded Land

A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning that the Green Belt boundary will endure beyond the plan period. Notwithstanding this, a policy has been included in the GMSF in relation to safeguarded land

5 Summary of IA

5.1 The GMCA commissioned ARUP to complete an Integrated Assessment of the GMSF / PfE Joint Plan.

5.2 The IA is a key component of the evidence base, ensuring that sustainability, environmental quality and health issues are addressed during its preparation. The IA combines the requirements and processes of the Sustainability Appraisal, Strategic Environmental Assessment, Equality Impact Assessment, and the Health Impact Assessment into one document. The Habitat Regulation Assessment of the GMSF was completed separately by GMEU. The IA carries out an assessment of the draft policies by testing the potential impacts and consideration of alternatives against IA objectives. This ensures that any potential impacts on the aim of achieving sustainable development are considered and that adequate mitigation and monitoring mechanisms are implemented.

5.3 Each draft of the plan has been supported by an IA. The 2020 IA provides a narrative detailing how the recommendations from the 2019 IA have been considered in the development of the policies in the GMSF 2020. In some cases the recommendations have resulted in changes to the policy wording, but in many cases it is considered that the recommendations are addressed by the Plan's thematic policies, because the Plan needs to be read as a whole. The 2020 IA highlights that the housing policies have many synergies in relation to the IA objectives and a large number of positive impacts are identified.

5.4 The housing policies in PfE 2021 will have substantially the same effect on the nine districts as those in GMSF 2020 and this is reflected in the 2021 IA Addendum. In terms of Policy JP-H 1 (Scale, Distribution and Phasing of New Housing Development) the Addendum notes that minor changes have been made to this policy to reflect Stockport withdrawing from the Plan and the housing figures have been updated to reflect the uplift required in Manchester. It finds that because the new figures still meet the identified housing need, the policy performs the same against the IA Framework. In terms of the other housing policies, the Addendum finds that minor changes have been made to them to remove GM references, and it is considered that they would perform the same against the IA Framework. The outcome of the 2020 assessment of the housing policies in GMSF 2020 is summarised below.

Policy GM-H 1 (now JP-H1) Scale, Distribution and Phasing of New Housing Development

5.5 The 2020 IA finds that this policy has strong synergies in relation to IA objective 1, which relates to the supply of land to provide an appropriate mix of housing to meet needs and to support economic growth. It also performs well against IA objective 9, which seeks to promote sustainable modes of transport. IA objective 11 seeks to conserve and enhance biodiversity and green infrastructure and is supported by the policy as green infrastructure will be provided through the suitable design of housing sites.

5.6 The 2019 IA recommended several enhancements to the policy. In response the policy wording in the 2020 Plan has been strengthened to reference that the necessary infrastructure and amenities will be provided to support the new homes being built. In relation to the other recommendations, the 2020 IA indicates that they are addressed by the Plan's thematic policies, which reflects the fact that the Plan should be read as a whole. The only residual recommendation relates to the need to explicitly reference climate change. However, this is not considered necessary because climate change is a key theme running throughout the 2020 Plan and it is addressed by a range of thematic policies, most notably those in the Plan's Sustainable and Resilient Greater Manchester chapter.

Policy GM-H 2 (now JP-H2) Affordability of New housing

5.7 The 2020 IA states that this policy has synergies with IA objective 1 as it seeks to increase the supply of affordable housing. It also finds that there are synergies with IA objectives 4 and 5 which aim to reduce levels of deprivation and eliminate discrimination.

5.8 The 2019 IA recommended several enhancements to the policy. In response to the recommendation relating to the location of affordable housing, the policy wording in the 2020 Plan has been strengthened to reference that affordable housing will be delivered to avoid clusters of tenure. The 2020 IA indicates that the other recommendations are addressed by the Plan's thematic policies.

Policy GM-H 3 (now JP-H3) Type, Size and Design of new housing

5.9 The 2020 IA states that this policy has synergies with IA objective 1 as it seeks to deliver a mix of housing values and tenures. As it aims to deliver a range of housing tenures, the policy also scores positively against objectives 4 and 5 which aim to reduce levels of deprivation and eliminate discrimination. In addition, the provision of green spaces throughout new housing developments will have positive impacts in terms of IA objective 6, which is focused on improving health and wellbeing.

5.10 The 2019 IA recommended several enhancements to the policy. No amendments have been made to the policy wording in relation to these enhancements in the 2020 Plan, but the 2020 IA notes that they are addressed by the Plan's thematic policies.

Policy GM-H 4 (now JP-H4) Density of New Housing

5.11 The 2020 IA states that this policy has synergies with IA objective 1 as it seeks to deliver housing that is in accessible areas to encourage walking, cycling and public transport use. It is also expected to have positive impacts in relation to IA objective 3, which is focused on transport. As housing will be delivered in accessible locations, encouraging active travel, the policy is expected to have positive impacts in relation to IA objectives 6, 7, 8 and 9, which relate to improving health and wellbeing, social infrastructure, education and skills, and sustainable modes of transport. Promoting active travel will reduce car dependency and will therefore help to reduce emissions and prevent further deterioration of air quality, and therefore the policy is anticipated to have positive impacts in relation to IA objectives 10 and 15 that relate to air quality, energy efficiency and greenhouse gas emissions.

5.12 As the policy seeks to deliver a mix of housing across a range of locations, it also scores positively against IA objectives 4 and 5 which aim to reduce levels of deprivation and eliminate discrimination. The policy is considered to have positive impacts in relation to IA objective 11 that to seeks to conserve and enhance biodiversity and green infrastructure, because it permits lower density housing in areas where there is justified by site specific issues, such as the presence of green infrastructure. The policy is also considered to have positive impacts in relation to IA objective 17 that relates to land resources, because it focuses higher density development near to public transport and town centres, which will reduce the amount of greenfield/Green Belt needed.

5.13 The 2019 IA recommended some minor enhancements to the policy. No amendments have been made to the policy wording in relation to these enhancements in the 2020 Plan, but the 2020 IA notes that they are addressed by the Plan's thematic policies.

6 Places for Everyone Joint DPD Strategy, Policies and Allocations

Implications for the Places for Everyone Joint DPD

6.1 This section outlines the proposed housing policies set out in the Places for Everyone Joint Publication Plan 2021, taking account of the policies, legislation and guidance in 2 'Policy context', the findings of the evidence studies outlined in 3 'Summary of evidence' and the issues raised from the Integrated Assessment and public consultation on the Draft GMSF in 4 'Summary of consultation' and 5 'Summary of IA'.

6.2 In the 2016 draft GMSF there was one main policy relating to the provision of housing, policy GM5. This sole policy mainly focused on the overall housing requirement, distribution across the 10 Greater Manchester authorities and the phasing of delivery over the plan period. Changes were proposed to this approach in response to the ongoing development of evidence, stakeholder engagement, public consultation and the recommendations of the 2016 Integrated Assessment. The 2019 Draft GMSF proposed a group of policies which relate to the delivery of housing across Greater Manchester.

6.3 These were taken forward into the publication Places for Everyone plan, with some amendments in response to further evidence, engagement and consultation and the latest integrated appraisal, and as a result of the withdrawal of Stockport from the plan and the changes to the Local Housing Need, into the 2021 Publication Joint Plan.

6.4 Key changes to housing policies from the 2019 Draft GMSF to the October 2020 GMSF and through to the 2021 Places for Everyone plan relate to:

- Updating the start of the plan period from 2018 in the 2019 Draft GMSF, to 2020 in the October 2020 GMSF, now 2021 in PfE 2021 Policy JP-H1.
- Updating the Local Housing Need to reflect the latest affordability ratios and changes to the Government methodology, including the 35% uplift for Manchester in PfE.
- The move from two stepped targets in the 2019 Draft to three steps in the October 2020 GMSF and PfE 2021, to reflect uncertainty regarding the impact

of the Covid-19 pandemic on housing delivery at the start of the plan period.

- Updates to reflect the withdrawal of Stockport from the plan, to remove their local housing need and their sites from the housing land supply, and to reflect the need for PfE to meet our share of target for 50,000 affordable homes in policy JP-H2.

6.5 Overall it is considered that despite the withdrawal of Stockport the plan will have substantially the same effect that the GMSF 2020 would have had on the nine districts producing the PfE Plan.

Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development

6.6 As expected by NPPF, the housing need set out in the Joint Plan has been derived using the standard methodology provided in the NPPG for calculating the Local Housing Need (LHN). The calculation of housing need makes an adjustment to take account of affordability, with an additional 35% uplift for those urban local authorities in the top 20 cities and urban centres list (i.e. Manchester). If insufficient new homes are provided to meet this need, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation that meets their needs. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.

6.7 The economic opportunities and quality of life that Greater Manchester can offer make it an attractive place for people to move to. This not only includes younger adults drawn by the universities, graduate jobs and lifestyle offer but also families attracted by the long-term prospects for their children, and older people wanting to take advantage of the wide range of cultural and leisure facilities.

6.8 Government wants local authorities to have a clear and consistent understanding of the number of new homes needed in an area. The standard Government methodology takes projected population and household growth and applies an affordability uplift, plus a further 35% cities and urban centres uplift applicable to Manchester, to provide a local housing need figure. Following this government methodology means that around 164,880 net additional dwellings will be required over the plan period. Further details on how the Government methodology has been applied can be found in the Local Housing Need section.

6.9 The emergence of a global pandemic in March 2020 caused by the Covid-19 virus rightly resulted in the need to understand what, if any, action should be taken in relation to the level of housing growth being proposed. Following an initial assessment of the potential impacts of Covid-19 on the housing market, in 2020 a further assessment was carried out to inform this plan. Both studies suggest that it became clear that there was insufficient evidence (either at a national or local level) to suggest that we should not be seeking to meet our overall housing need (as calculated by the standard LHN methodology) as a result of Covid-19. That said it is considered that a cautious approach to predicting delivery rates should be followed in the early years of the plan.

6.10 Therefore, whilst it is recognised that the country was in a state of flux, it is very clear that to delay the production of the plan further could have a negative effect on the proper planning of the conurbation and therefore its recovery. Instead it is considered appropriate to proceed on the basis that we should seek to meet our LHN up to 2037 but to use the process of local plan review to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable.

6.11 The scale of new housing proposed is a minimum of 164,880 net additional dwellings over the period 2021-2037, equating to an annual average of 10,305 dwellings per year.

Meeting the Local Housing Need

6.12 There is a strong focus in the Plan on directing new housing towards previously-developed sites within the existing urban area. In numerical terms, the existing supply of potential housing sites identified in the districts strategic housing land availability assessment and small sites allowances (170,385 dwellings) is adequate to meet the overall identified need of 164,880 net additional dwellings.

6.13 Meeting the numerical needs alone, is not enough. We must be able to demonstrate that our land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver a balanced and inclusive growth, thereby achieving the overall spatial strategy. In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it has been necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options, it has been concluded that it in order to achieve this, it has been necessary to remove some land from the Green Belt and to allocate this land within the Joint Plan for residential development.

6.14 This flexibility will need to make a reasonable allowance for the possibility that some sites in the overall supply may not come forward as currently envisaged whilst also enabling a degree of choice to be incorporated into the delivery of sites. Adopting such an approach will mean that Greater Manchester will be able to ensure that the target remains deliverable whilst reducing the risk of additional greenfield/Green Belt sites being approved via planning appeal during the plan period. The need for flexibility is supported by the evidence from the Viability Appraisal, which identifies that delivery of the existing land supply may be more challenging in the low value areas.

6.15 Introducing a level of flexibility in this way should not however result in the housing target being inflated. Taking such an approach would actually remove the flexibility in the housing land supply, thereby defeating the objective of the approach outlined above.

6.16 There is no national guidance on how such an allowance for flexibility should be calculated. Having carried out a high-level desktop review of recently examined/adopted plans, it is clear that a number of alternative approaches have been followed by local authorities in plan making. These include discounting a proportion of the supply or allowing a buffer for flexibility and choice, or a combination of the two.

6.17 The 2019 Draft GMSF incorporated a flexibility allowance of 9%, which was considered reasonable at that time. However, in light of some of the viability challenges identified in low value areas through the Viability Appraisal of the Spatial Framework and subsequent addendum, and the high proportion of brownfield sites, it is considered appropriate to incorporate a slightly larger flexibility allowance. Moreover, the paper detailing the case for exceptional circumstances to amend the Green Belt sets out the strategic position with respect to housing that necessitates the need to consider land which is currently protected open land / safeguarded land or Green Belt.

6.18 Following the review of the evidence it is considered that we should identify sufficient housing land above the LHN to ensure an appropriate level of flexibility and choice has been taken into consideration. Each district will have their own buffer dependent on their own circumstances, and will be assessed individually for the Housing Delivery Test and Five Year Supply. An overall buffer of around 15% across the plan area is considered reasonable, and is not a sign that excess land has been identified, but is in fact necessary to demonstrate that the targets can be met, particularly in light of the viability challenges presented in the Strategic Viability report. Following such an approach will mean that we will be able to demonstrate we can meet our LHN.

6.19 To identify potential development sites for allocation to meet this shortfall a site selection process was undertaken in line with the plan objectives and spatial strategy. Further information on this process can be found in the Site Selection Background Paper (July 2021).

6.20 Although the base date of the plan is now April 2021, it is not possible for all the districts to complete a full SHLAA update ahead of the publication of the Places for Everyone Plan without delaying progress towards the Government's December 2023 deadline to have a plan in place. Therefore, an assumed level of completions for 2020/21 based on the October 2020 GMSF targets for 2020/21 has been deducted from the 2020 baseline supply to provide an estimate of the current supply.

6.21 Having combined the baseline supply for 2020-2037 (including an allowance for small sites windfall and clearances / demolitions) (178,342) and made a deduction to allow for completions in 2020/21 (7,957), with the potential allocations identified through the site selection process (20,367) sufficient land has been identified for 190,752 dwellings, as set out in Table 6.1 below.

Table 6.1 Total housing land supply

District	Brownfield	Greenfield	Mixed	Allowances	Allocations 2020-2037	Total 2020 - 2037	GMSF Oct 2020 Y1 target	Est supply 2021-2037
Bolton	10,686	2,469	-	2,021	-	15,176	504	**14,672**
Bury	3,056	424	362	261	4,700	8,803	187	**8,616**
Manchester	49,455	2,591	9,676	805	-	62,527	2,951	**59,576**

District	Brownfield	Greenfield	Mixed	Allowances	Allocations 2020-2037	Total 2020 - 2037	GMSF Oct 2020 Y1 target	Est supply 2021-2037
Oldham	7,712	1,276	1,410	557	2,176	13,131	330	**12,801**
Rochdale	5,518	2,836	426	-783	4,006	12,003	569	**11,434**
Salford	30,634	2,137	1,473	1,959	1,500	37,703	1,680	**36,023**
Tameside	5,017	755	575	576	1,558	8,481	281	**8,200**
Trafford	12,293	2,568	824	777	4,827	21,289	591	**20,698**
Wigan	10,769	6,403	68	756	1,600	19,596	864	**18,732**
PfE	135,140	21,459	14,814	6,929	20,367	198,709	7,957	**190,752**

6.22 This represents 16% over the total Local Housing Need (164,880). Given the conclusion above it is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we demonstrate we can meet our LHN.

6.23 Information on the release of the Green Belt under exceptional circumstances can be found in the Green Belt Topic Paper.

Distribution of new housing development

6.24 The population of the PfE plan area is projected to increase by 158,194 (6.2%) from 2021 to 2037. The highest levels of population growth across Greater Manchester are projected to be in the two cities Manchester (32,700 increase in residents) and Salford (31,000). The next largest increases are projected to be in Rochdale (19,100) and Oldham (16,700). In contrast the projected population growth in the other northern districts across the conurbation is lower. Overall though, projected demographic changes across Greater Manchester still broadly mirror recent economic forecast changes. If these trends continue unchecked then inequalities across Greater Manchester could widen further, with prosperity increasingly focused in the centre and the south of the conurbation. Northern areas lacking the scale and quality of housing investment to support their regeneration fully enough for them to make a greater contribution to the economic success of Greater Manchester.

6.25 In order to help address these issues, higher levels of housing growth will be focused in the central and northern districts of Greater Manchester. Manchester and Salford will continue to be an appropriate location for the highest levels of new housing due to their central location, good public transport connections, proximity to the main concentrations of employment and leisure opportunities, and ability to deliver very high density developments. Supporting higher levels of new housing in the northern districts will assist in achieving a more balanced pattern of growth across Greater Manchester and a better distribution of skilled workers to support local economies, helping to reduce disparities. The proposed distribution of housing development also reflects the availability of suitable sites in each of the districts.

6.26 The overall housing land requirement has been distributed to seek to achieve the Places for Everyone Spatial Strategy. The distributed figure forms the housing target for each district and reflects the housing aspirations for the city region and supports the long-term economic success of Greater Manchester.

6.27 As set out in the Growth and Spatial Options topic paper, in order to achieve the principles established by the spatial strategy, it was considered appropriate to establish a number of "rules" when applying the site selection criteria to housing sites. These rules were established as part of the process of preparing the GMSF and were:

- Each district was encouraged to meet their own LHN
- Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt.
- If a single district could not meet their own local housing need through their existing land supply there was an expectation that they would need to supplement their land supply through allocations beyond the urban area, to enable them to meet a significant proportion of their own LHN, considered to be at least 70% of its LHN
- No single district should exceed its LHN by more than 125%
- Collectively the northern Greater Manchester districts should meet around 100% of their collective LHN, in order to ensure that the overall objective of inclusive growth and boosting the competitiveness of north Greater Manchester would succeed
- The southern Greater Manchester districts should collectively meet a significant amount of their LHN, in order to achieve inclusive growth across Greater Manchester

6.28 This approach has been carried forward from the October 2020 draft GMSF, with each district PfE target meeting broadly the same percentage of its local housing need (based on the latest updated LHN figures) as was proposed in the October 2020 draft GMSF. The exception to this is Manchester because their LHN has increased significantly as a result of the 35% cities and urban centres uplift, so the new target for Manchester is based on meeting 100% of its new LHN, whereas in the October 2020 draft GMSF Manchester's target was 113% of its old LHN.

6.29 The distribution of new housing development over the period 2021-2037 will be broadly in accordance with Table 6.2: Distribution and phasing of new housing development (2021-2037):

Table 6.2: Distribution and phasing of new housing development (2021-2037)

District	Annual average 2021-2037	Annual Target 2021-2025	Annual Target 2025-2030	Annual Target 2030-2037	Total target	Total target as % of LHN
Bolton	787	536	787	930	12,589	100%
Bury	452	199	452	596	7,228	76%
Manchester	3,533	3,533	3,533	3,533	56,528	100%
Oldham	680	352	680	868	10,884	100%
Rochdale	616	606	616	622	9,858	122%
Salford	1,658	1,658	1,658	1,658	26,528	125%
Tameside	485	299	485	591	7,758	74%
Trafford	1,122	629	1,122	1,404	17,954	81%
Wigan	972	920	972	1,002	15,554	111%
PfE	10,305	8,732	10,305	11,204	164,881	100%

6.30 Each district has sufficient supply to meet its identified housing target, as set out in Table 6.3, with all districts having a minimum of a 5% buffer when their supply is compared to their target, and an overall buffer of 16%:

Table 6.3: Housing land supply buffers

District	Total target	Total supply	Buffer	% buffer
Bolton	12,589	14,672	2,083	17%
Bury	7,228	8,616	1,388	19%
Manchester	56,528	59,576	3,048	5%
Oldham	10,884	12,801	1,917	18%

District	Total target	Total supply	Buffer	% buffer
Rochdale	9,858	11,434	1,576	16%
Salford	26,528	36,023	9,495	36%
Tameside	7,758	8,200	442	6%
Trafford	17,954	20,698	2,744	15%
Wigan	15,554	18,732	3,178	20%
PfE	164,881	190,752	25,871	16%

6.31 As they are now, following the adoption of the Joint Plan each district will be assessed individually in relation to the Housing Delivery Test and Five Year Housing Land Supply. It is therefore important that each district can demonstrate a buffer on supply to ensure that they can deliver and meet their own housing targets. The variation in buffers across the districts is reflective of each districts' ability to identify sufficient suitable sites to meet their target. The low buffer in Manchester is reflective of the need to accommodate the uplift in its Local Housing Need. The low buffer in Tameside is reflective of the limited supply of suitable sites in the district coupled with the rules ensuring that it is meeting at least 70% of LHN. Although they have a low buffer overall, as with others Tameside and Manchester still have at least a 35% buffer in the early years of the plan. This approach enables the overall spatial strategy to be met, whilst reflecting the challenges in terms of overall supply in these districts.

Phasing of new housing development in Greater Manchester

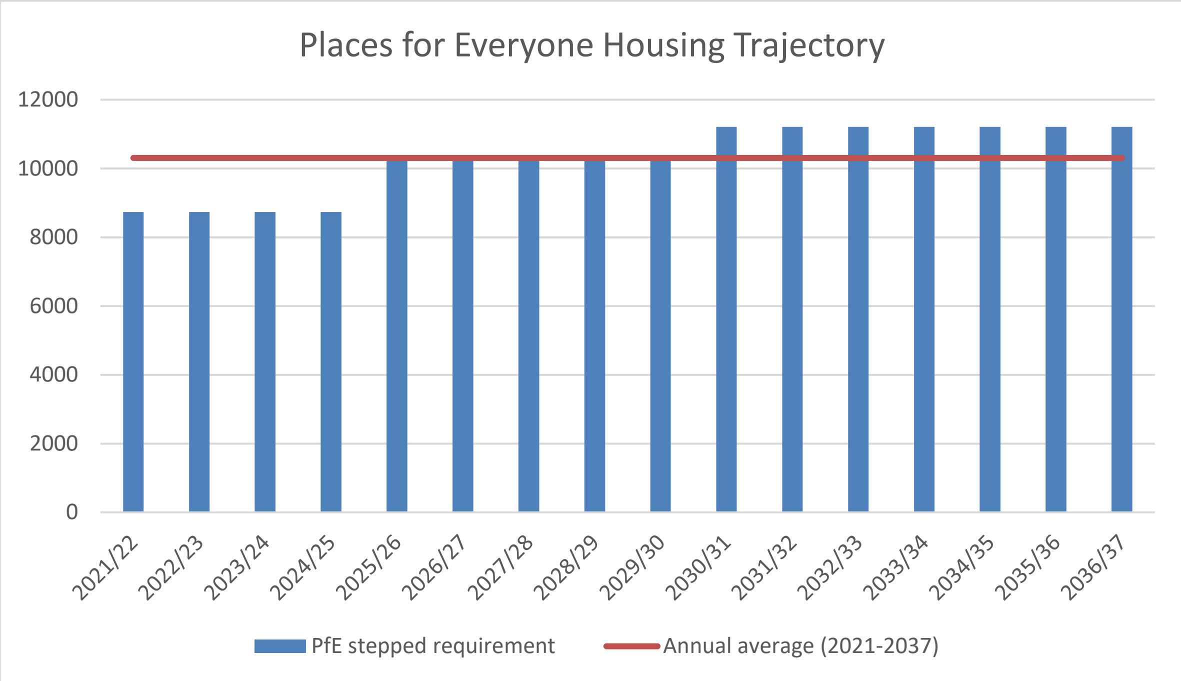
6.32 The average annual housing requirement for the plan area of 10,305 net additional dwellings per annum was achieved in 2018/19 for the first time since the peak of the housing market, in 2006/07 and 2007/08, and this achievement also continued in 2019/20 with 12,443 net completions. It has therefore been demonstrated that this level of residential development can be achieved. However, it is also true to say that following shocks like the financial crisis of 2008, completions can see significant drops. Therefore Greater Manchester needs to identify a phasing trajectory which it considers is realistic and which will result in housing being delivered as planned over the life of the plan. Until March 2020 there would have been little reason to suspect that recent delivery trends would not continue, however in March 2020 there was a major health induced economic event, caused by the Covid-19 pandemic. Although this pandemic caused an initial shock to the construction industry, which might have an impact on delivery rates in the early years of the plan, there is no robust evidence to suggest that it could have such long term impacts to warrant reducing the overall housing land target from that derived from the standard methodology. Instead, this plan recognises the uncertainty that the pandemic may have on the housing sector in the short-term by ensuring that there is a significant buffer on the housing land supply to meet the proposed phasing. This will enable sufficient flexibility, which in turn gives confidence in the delivery rates in the early years of the plan period.

6.33 Ensuring sufficient flexibility in the supply in the first years of the plan will not be sufficient on its own to ensure housing delivery happens as planned. A significant proportion of the land supply in the early years of the plan is made up from sites within the urban area, the majority of which are on previously developed land. Many of these sites therefore face challenges which will need assistance to kick-start their delivery. As part of Greater Manchester we have been lobbying central Government for many years to secure funding to enable it to achieve the common goal of delivering as many homes on brownfield land as possible and keeping to a minimum the need to release Green Belt land. A number of key schemes within Greater Manchester have successfully been awarded funding through the Housing Infrastructure Fund and Greater Manchester has also recently been awarded funding through the Brownfield Land Fund. This type of funding, together with proactive work in relation to housing delivery by each of the local planning authorities will help to ensure that delivery will keep apace as anticipated in this Plan.

6.34 It is not the impact of Covid-19 alone that means that we need to be realistic in terms of delivery rates over the early years of the plan period. The masterplanning and infrastructure investments required to support the development of some sites, including many of the allocations in the Joint Plan, means that they may only produce large numbers of new dwellings in the latter phases of the plan period. In some parts of the conurbation it will be necessary to develop new markets for housing, which is vital to delivering the overall strategy for the plan area but may take some time to achieve.

6.35 Taking all of these factors into account, it is anticipated that there will be around 8,732 housing completions per year on average up until March 2025, increasing to an average of around 10,305 net additional dwellings per annum up to March 2030 and accelerating to around 11,204 per annum up to March 2037. This trajectory is shown below.

Figure 6.1: Places for Everyone Housing Target Trajectory



6.36 The targets have been stepped to ensure that all districts have at least a 35% buffer on their supply in the first four years of the plan period (to reflect five years from the start of the pandemic). This is considered appropriate given the uncertainties arising as a result of the pandemic, as well as the viability evidence which has demonstrated that around 69% of the 2020-2025 baseline supply is viable

6.37 The buffer then reduces to a minimum 20% buffer for 2025-2030 (or a flat target in the case of Manchester to avoid a step down), with the targets for the latter part of the plan period set to ensure the overall plan target is met.

6.38 Whilst the trajectory in this plan is considered to be realistic, given the relatively unknown impacts of Covid-19 at this point in time, it is possible that delivery could in fact be different to that currently anticipated. Therefore, in such an eventuality the surplus or shortfall will be distributed over the remaining years of the plan. In this way, any over delivery within a local planning authority area will not result in that authority being adversely affected when it comes to calculating their five-year housing land supply.

6.39 The work of each of the local planning authorities in terms of housing delivery will be key to ensuring that these step changes in delivery rates are achieved and these will be reviewed regularly as part of the housing delivery test process (as set out in Section 3 of this report), with action plans put in place where required to identify measures to improve delivery. Despite some of the uncertainties arising as a result of the Covid-19 pandemic, it is very clear that to delay the production of the plan further could have a negative effect on the proper planning of the conurbation and therefore its recovery. Instead it is considered appropriate to proceed on the basis that we should seek to meet our LHN up to 2037 but take a cautious approach to predicting delivery rates in the early years of the plan, and to use the process of local plan review to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable.

Delivering Markets to Deliver Numbers

6.40 The GMCA has been proactive in identifying a range of schemes and mechanisms that, when fully developed, will boost housing growth across its constituent authorities in the long term. This will continue to be a core activity for GMCA and constituent authorities throughout the life of the plan, as funding opportunities and priorities evolve. This section outlines the current tools and strategies in place and being developed to support this housing delivery.

Greater Manchester Delivery Team

6.41 Enabling the delivery of new homes at the scale necessary to meet local housing targets set through the Joint Plan requires an enhanced and suitably resourced approach to developing and managing the city region's development pipeline. The establishment of the Greater Manchester Delivery Team is central to the task of turning the Greater Manchester pipeline of potential sites into viable, deliverable, investable schemes which can then be brought forward for development.

6.42 The Delivery Team is supporting the appropriate allocation of resources into site investigation and preparation where this aids the delivery of new housing. Working with district authorities on a match funding basis, they are bringing forward schemes that meet the relevant value for money and deliverability criteria for the receipt of public funding support. Resources are being deployed where they will unlock delivery.

Housing Investment Loan Fund

6.43 As part of the Greater Manchester Devolution Agreement, Greater Manchester secured £300 million recyclable funding from Government over a ten year period to develop a Housing Investment Loan Fund (HILF). HILF provides traditional development finance to support housing growth across Greater Manchester, aiming to encourage, accelerate and unlock residential housing schemes through competitive pricing and lending structures for private sector-led schemes.

6.44 The HILF is now in its seventh year of operation and has committed £510m of funding to support the delivery of 6,886 units across Greater Manchester, with over 3,900 units completed to date.

Brownfield Housing Fund

6.45 In the March 2020 Budget, Government announced plans for a £400m Brownfield Housing Fund aimed at creating more homes on brownfield land, as part of a package of measures intended to boost housing delivery. In late June 2020, the Ministry for Housing, Communities and Local Government confirmed funding would be allocated on a per capita basis to Combined Authority areas. Greater Manchester was granted an initial allocation of £81.1m over a five year period, to deliver a minimum of 5,500 units.

6.46 The funding is enabling the Greater Manchester Delivery Team to work with districts to identify a pipeline of eligible brownfield schemes to support the delivery of a greater number of new homes to meet local needs which would otherwise not be brought forward by the market.

6.47 In additional to the £81.1m grant allocation, a £1.94m revenue spend was provided to accelerate the development of sites in the later years of the programme that would result in an earlier start on site. The revenue element of the funding is being utilised to provide legal support, appoint monitoring support and to provide consultant support to assist with site prioritisation, support scheme delivery and spend profiles where necessary and to support the acceleration of development work on prioritised schemes.

6.48 In addition, 10% of the initial £400m pot was earmarked for a further competitive round of submissions, from which the GMCA was subsequently awarded £15.8m.

This brings the overall total to be allocated across sites in GM to £96.9m.

Getting Building Fund

6.49 In June 2020 Greater Manchester received an allocation of £54.2m from Government as part of the Getting Building Fund. The fund is being used to support ‘shovel ready’ sites with a key focus on job creation and economic recovery with all allocated spend to be outlaid by 31 March 2022.

6.50 More than 11,000 new jobs will be created and 1,000 new homes built through the funding in Greater Manchester, which will also bring 4.5km of roads, cycle ways and walkways supporting 29 businesses and 205,000 square metres of commercial space.

6.51 The projects will be delivered within less than 18 months and provide an immediate kick-start to the creation of new jobs in Greater Manchester’s growth sectors and support the implementation of the Greater Manchester Local Industrial Strategy. They also support the regeneration of previously developed land and empty buildings, breathing new life into town and city centres by providing infrastructure, transport links and public spaces.

Housing Infrastructure Fund

6.52 Manchester City Council successfully bid for £51.6m funding from the Government’s Housing Infrastructure Fund Programme to bring forward new homes over the next 15 to 20 years. GMCA supported Manchester City Council in the bid process which focused on 20 hectares of brownfield land that will address a series of core infrastructure constraints and support the delivery of new homes, along with investment in walking and cycling routes, and new road access to improve connectivity across the Northern Gateway area to the North of the city centre.

6.53 At 155 hectares, the Northern Gateway has the potential to deliver 15,000 new homes, and is identified as strategically important in the Joint Plan. The site will include at least 3,000 affordable homes, supporting housing aspirations of residents through high-quality homes that residents can afford, in attractive areas they want to live in.

Marginal Viability Fund

6.54 The Marginal Viability Fund was launched by Government in July 2017 and offered grant to local authorities to provide the final or missing piece of infrastructure funding to get additional sites allocated or existing sites unblocked quickly. In February 2018, twelve schemes across Greater Manchester received £69m marginal viability grant funding to unlock the delivery of over 10,000 homes.

Single Housing Infrastructure Fund

6.55 As trailed in the 2020 Budget, Government announced that it would launch a £10 billion Single Housing Infrastructure Fund (SHIF), a new long-term funding stream to unlock new homes in areas of high demand across the country by funding the provision of strategic infrastructure and assembling land for development. It is understood that this fund has been incoporated in the National Home Building Fund detailed below, under a land and infrastructure focus. Greater Manchester are positioning their strategic infrastructure programme to be able to access the funding opportunity to bring forward housing opportunities.

National Home Building Fund

6.56 As part of the November 2020 Spending Review, the government announced a National Home Building Fund investing £7.1 billion over 4 years (including £4.8bn of previously announced capital grant funding for land remediation, infrastructure investment and land assembly), designed to support smaller developers, unlock brownfield land and support innovative construction techniques. The fund will support up to 660,000 jobs and unlock up to 860,000 homes. It includes funding for:

- A new ‘Help to Build’ equity loan scheme for people who want to build their homes, providing access to low deposit mortgages.
- £2.2 bilion of loans for small and medium enterprises (SMEs) and innovative housebuilders to support new housing in areas where it is needed most.
- An additional £100 million of grant funding in 2021-2022 for unlocking brownfield sites, supporting house building on land that may be less attractive such as ex-industrial sites.

Strategic Place Partnership with Homes England

6.57 Homes England offer a range of funding tools and investment as the Government’s housing accelerator. GMCA are working towards agreement to a proposal developed jointly with Homes England for a strategic partnership built around joint investment and working to deliver agreed outcomes. This would allow for more place-based engagement and resource alignment around the key priorities with Greater Manchester Housing Providers and other local and national partners.

6.58 Through this, a collective view of housing delivery opportunities across Greater Manchester and, importantly, what is required to unlock them would be provided, and help ensure accelerated new homes delivery to support achievement of Greater Manchester's overall housing requirements as set in the Joint Plan.

6.59 The Strategic Place Partnership would allow for targeted support for modern method of construction schemes being brought forward in Greater Manchester to build the local capacity and deliver low carbon homes.

Affordable Homes Programme 2021-2026

6.60 A key element of the Homes England portfolio of investment and funding programmes is their capital funding for affordable housing delivery. In September 2020, Homes England published guidance for housing providers looking to bid for the Affordable Homes Programme (AHP) for the period 2021 to 2026. The Affordable Homes Programme will provide grant funding to support the capital costs of developing affordable housing for rent or sale. Homes England will be making £7.39bn available outside of London from April 2021 to deliver up to 130,000 affordable homes by March 2026.

6.61 It is expected that, nationally, around half of the funding programme will be for affordable home ownership and the remainder will be made available for discounted rent, including 10% for supported housing, to support those with physical or mental health challenges, and a mix of affordable rent and social rented homes.

6.62 For Greater Manchester, accelerated affordable homes delivery would be prioritised including homes for affordable and social rent, older persons and specialist housing, to support PfE objectives to deliver our share of the total of 50,000 additional affordable homes, with at least 60% being for for affordable or social rent across Greater Manchester.

Greater Manchester Housing Providers

6.63 Greater Manchester Housing Providers (GMHP) are a group of 25 social housing providers who collectively manage more than 250,000 homes in the city region, and are committed to a wide programme of joint work on issues including health and social care, carbon reduction, homelessness, work and skills and ageing better, as well as developing new homes. The group contribute £1.2bn in GVA to the Greater Manchester economy and support more than 28,000 full-time jobs across local communities.

6.64 Greater Manchester Housing Providers have made a collective commitment to double their delivery of new homes, to 16,000 over five years from 2018, to support the housing delivery targets in the city region, and are central to the delivery of affordable homes in particular.

Tripartite Agreement with Greater Manchester Housing Providers and the Greater Manchester Health and Social Care Partnership

6.65 In September 2020, Greater Manchester Combined Authority agreed a Tripartite Agreement with Greater Manchester Housing Providers and the Greater Manchester Health and Social Care Partnership (GMHSCP) which sets out a collective approach and commitment from all partners to help address the impacts on inequalities and quality of life of poor, unaffordable or inaccessible housing, building upon previous achievements and aligning with the Greater Manchester Strategy.

6.66 The Tripartite Agreement captures the commitment made by the GMHP, GMHSCP and the Combined Authority to work more closely together to add value and share outcomes. The conditions of COVID-19 make this partnership working even more critical to provide resilience and enable continued and ambitious delivery at scale.

6.67 Working together, this partnership is bigger than the sum of their constituent parts and the Tripartite Agreement explains how the partners will work together, how resources will be shared, how ambitious they can be as a partnership and how this supports the strategic framework of the Combined Authority and people living and working in Greater Manchester.

6.68 It is a commitment that sets out the vision and plans to work alongside local people and neighbourhoods to deliver positive change. The partnership formalises how the partners will align expertise, resources, influence, knowledge and capacity to deliver better outcomes with local people. Supporting this agreement are detailed workplans for each partner that outline how our strategic commitments translate into projects and outcomes ‘on the ground’.

Joint Venture

6.69 In October 2018, an innovative partnership between the Greater Manchester Combined Authority and Greater Manchester Housing Providers was launched to build hundreds of homes a year to help address the shortfall of housing in the city region over and above housing providers’ ongoing programmes of new affordable homes.

6.70 The Registered Providers Joint Venture partnership between the GMCA and ten Greater Manchester housing associations (Hive Homes) is one of the first of its kind in the country. It is an ambitious new entrant in the Greater Manchester housing market, delivering homes of all sizes across the ten districts to meet the needs of our communities. The vehicle is acquiring land, in the first instance, from Greater Manchester districts and building homes for market sale. The level of affordable housing provided and any section 106 contributions on specific sites will be determined by negotiation with individual districts. Hive Homes is an ambitious newcomer in the Greater Manchester market, with an objective to ultimately deliver 500 homes a year. It will accelerate delivery to help meet housing targets, including potential to deliver affordable and social rented homes in partnership with local authorities.

One Public Estate

6.71 Greater Manchester is working together and breaking down historical barriers to get the best use of public land and property through the One Public Estate (OPE) programme. The programme is catalysing and supporting joint estates planning across public partners to unlock development potential by rationalising public sector land and buildings.

Town Centres

6.72 Town Centres are critical to the future success of all parts of Greater Manchester and the Mayor is helping local authorities and their partners in bringing forward proposals for how town centres can be re-purposed and modernised through transformational development and become quality places to live and work.

6.73 The Mayor's Town Centre Challenge was launched in November 2017 to regenerate nominated town centres across Greater Manchester. It provides a significant opportunity to secure regeneration and progress strategic development projects across Greater Manchester's town centres by utilising the Mayor's powers and resources with the agreement of and in conjunction with each of the local authorities in Greater Manchester. Through the initiative, the Mayor will facilitate and drive regeneration and use his convening powers to bring together stakeholders and partners to unlock the potential residential development of town centres and galvanise delivery and change.

6.74 The model harnessing the potential of MDCs to bring about large-scale regeneration while ensuring they fit with the unique local circumstances and do not create major additional bureaucracy. They will support local authorities to address the problems of viability and the need for new investment into town centres and harness public and private sector drive to deliver change, especially in terms of new homes by releasing the hidden demand for residential development in many town centres.

6.75 There are also national funding streams available to support the revitalisation of town centres and to develop a strategic approach to towns and high streets which maximises their potential for residential development. Across Greater Manchester, districts have benefitted from access to the Future High Streets Fund (part of a wider Towns Fund package) to help improve transport and access into town centres, convert empty retail units into new homes and workplaces, and invest in vital infrastructure. Four towns have also been successful in receiving £25m each as part of the Government's Town Deals, with two districts also receiving support through the High Street Task Force.

6.76 The national Levelling Up Fund of £4.8 billion will support the development of infrastructure across the UK. The first round will focus on three themes of transport, cultural investment and regeneration and town centre investment building on the Towns Fund framework to upgrade dated buildings and infrastructure, acquire and regenerate brownfield sites, invest in secure community infrastructure and crime reduction, and bring public services and safe community spaces into town and city centres. Each local authority has been allocated a priority category; nine Greater Manchester districts are in category 1 (the highest priority), and Salford is in category 2.

Community-led Housing Hub

6.77 GMCA have worked in partnership with Irwell Valley Housing Association, Homes England, GMCVO and North West Housing Services to support the development of co-operative and community-led housing projects across the conurbation. A community-led housing hub is now in place to provide support to the development of co-operative and other community-based housing projects across Greater Manchester to deliver new homes for residents. This is now led by a Steering Group including representatives of community-led housing groups across the city region, and the hub is itself working toward being fully community-led and independent. Greater Manchester is the home of the co-operative movement, and the GMCA is a member of the Co-operatives Councils' Innovation Network (CCIN). GMCA aims to create clear pathways and effective support for community organisations to help them to set up and deliver community-led housing projects, as a further addition to the mix of housing supply.

Policy JP-H 2 Affordability of New housing

6.78 A key challenge and priority for Greater Manchester is to ensure that new housing comes forward at a price that potential occupiers can afford. Overall, Greater Manchester is a relatively affordable place to live on average compared to some other parts of the UK, particularly London and the South. This is an important aspect of the competitiveness of Greater Manchester that will need to be maintained if high levels of economic growth are to be delivered, and all residents are to share in its benefits.

6.79 However, affordability has been worsening in recent years, and there are a significant number of households who are unable to find suitable homes at an affordable cost. The cost of housing is a challenge to different cohorts within the housing system - including those needing access to social rent or trying to maintain a tenancy as welfare rules are squeezed; private renters sharing; those saving as prospective First Time Buyers looking for routes into home ownership; people in unstable employment in any tenure; older owner-occupiers without the resources to maintain a decaying property, or people living in overcrowded properties because they cannot afford or access a home large enough to meet their needs. As a result, some people are living in inadequate accommodation and/or spending an unacceptably large proportion of their income on housing, which in turn increases levels of poverty. The official definition of affordable housing does not adequately address the diverse range of need within our boroughs. Through its housing strategy, Greater Manchester sets out its approach to tackle the housing crisis, to ensure our housing solutions address the needs and aspirations of current and future citizens. Importantly our housing crisis will not be fixed by the planning system alone, although it will play a key role in this work.

6.80 There are currently over 72,000 households on the local authority registers, with 26,750 of these identified as being in reasonable preference for housing (as defined by the 1996 Housing Act). It is estimated that around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices. The lower quartile is the point at which one-quarter of properties are cheaper to buy/rent, and three-quarters are more expensive, representing a typical entry point property for new households prices. New build is just one of the ways to meet this need.

6.81 Consequently, increasing the delivery of affordable housing across the plan area is a very high priority, and it will be essential that new residential developments play a full role in supporting this. There are a variety of ways of delivering affordable housing and the emphasis in some parts of our area may be on increasing the supply of social rented and affordable rented properties, reflecting the low incomes of many households in need. In other parts, alternative types of affordable housing may also be suitable, such as shared ownership, affordable market rent, and discount market sales.

6.82 In doing this it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations, helping to ensure that Greater Manchester can attract and retain skilled workers, bring more money into local economies and deliver more mixed and inclusive communities.

Policy JP-H 3 Type, Size and Design of new housing

6.83 Increasing the supply of affordable homes is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations.

6.84 Greater Manchester is in competition with cities across the world to attract and retain the skilled workers that will be critical to delivering high and sustained levels of economic growth. It already has some particularly attractive residential neighbourhoods, several of which can command very high house prices, both within the high-density areas of the City Centre and The Quays, and in some of the lower density suburbs. Many of the higher value suburban neighbourhoods are located in the south of the conurbation, forming part of a much larger high-value area extending into north Cheshire, although there are smaller and more dispersed prosperous housing areas elsewhere in the sub-region.

6.85 A key aim of the plan is to boost the supply of well designed, adaptable new homes with appropriate access to private space. In some areas this will help to diversify local housing markets that are often dominated by low-cost housing, bring more money into local economies, and deliver more mixed and inclusive communities. It will also help to increase the options for skilled workers looking to move into or within our area. Focusing a significant proportion of housing growth in the northern areas will assist in this, supported by selectively releasing Green Belt sites to deliver a diverse mix of values and tenures that includes affordable homes as well as some higher value housing, (relative to prevailing values in the local area), within a high quality environment. This will help to achieve a better spread of higher value housing and prosperity across Greater Manchester, whilst also delivering greater diversity within individual areas.

6.86 A diverse range of housing will be required to meet population and household growth. Just over 70% of the population increase 2021-2037 is projected to be in those aged 65 and over. In contrast the population of those aged under 18 is projected to decrease by more than 12,000. Indeed, those aged 65 and over are projected to account for large proportions of the growth in each district and ranging from 34% of the growth in Salford to 145% in Wigan and 166% in Bolton (and those under 65 in Bolton decreasing by 5,000 and those under 65 in Wigan decreasing by 6,100).

6.87 A key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends.

6.88 Smaller households are forecast to account for over half of the growth in households. It is anticipated that this will further strengthen the demand in apartments, particularly given cost pressures and the increased reliance on private rented accommodation. However, some single and couple households will want or need to live in larger dwellings, for example to facilitate home-working or accommodate visiting relatives. There is scope to increase the number of families living in apartments, especially if higher density neighbourhoods can be made more inclusive for all age groups. The land supply that has been identified responds to these needs as demonstrated by Table 6.4: Residential Land Supply - Split of houses and apartments.

Table 6.4: Residential Land Supply - Split of houses and apartments

District	% houses 2020-2037	% apartments 2020-2037
Bolton	60	40
Bury	78	22
Manchester	16	84
Oldham	65	35
Rochdale	83	17
Salford	19	81
Tameside	60	40
Trafford	36	64
Wigan	89	11
PfE total	41	59

6.89 The ageing population will necessitate a renewed emphasis on ensuring that a diverse range of housing is available to meet the needs of older people and households. This will require new dwellings to be more adaptable, and designed with potential care needs in mind, so that older people can remain in their homes if they wish as their circumstances change. There also need to be much better options for those who would like to move, perhaps to a dwelling of a more appropriate size in a location that enables them to easily access local services and facilities, and this could help to release some existing houses for families with dependent children.

6.90 The UK has the smallest average new-build dwellings in Europe and cost considerations for both developers and households are placing further downward pressure on dwelling size. This potentially creates a number of problems, resulting in less adaptable dwellings that are unable to respond to the changing needs of households, poor health resulting from cramped conditions and overcrowding, and overall a lower quality of life. The lack of space can also inhibit home-working, which will be increasingly important in helping to minimise the need to travel and enabling us to take advantage of digital-based business opportunities. It is therefore essential that new housing achieves minimum standards that will help to ensure that it is able to meet identified needs and contributes to rather than detracts from the relative attractiveness of Greater Manchester as a place to live. The provision of appropriate outdoor private amenity space will also be vital in delivering high quality homes that support good health.

Policy JP-H 4 Density of New Housing

6.91 Increasing the average density of new housing developments in the most accessible locations is an important part of our overall strategy, providing a number of benefits. It will reduce the amount of land that needs to be used for development, thereby assisting the protection of greenfield and Green Belt land. It will help to minimise the need to travel, enabling more people to live close to shops and services, and increasing the local population necessary to support local facilities and support regeneration. It will also maximise the number of people living in the most accessible places, helping to increase the proportion of trips made by walking, cycling and public transport, and reducing the demand for car-based travel. The approach to housing densities directly supports the objectives of the Mayor's Town Centre Challenge.

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Appendix A: Places for Everyone Housing Land Supply Statement

Places for Everyone Housing Land Supply Statement

Executive Summary

This report sets out the Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan housing land supply position as of 1 April 2020 and is part of the evidence base for the Places for Everyone Joint Development Plan Document. It has been prepared jointly by the nine Local Authorities and in accordance with national planning guidance.

As a result of changes to the LHN methodology which have resulted in a 35% uplift to Manchester's local housing need, Manchester City Council have carried out an interim review of their housing land supply to demonstrate that this uplift can be accommodated This is incorporated within the figures throughout this report.

The Housing Land Supply position as of 1 April 2020 is summarised in the tables below.

Table 0.1: Housing Supply Summary (2020-2037)

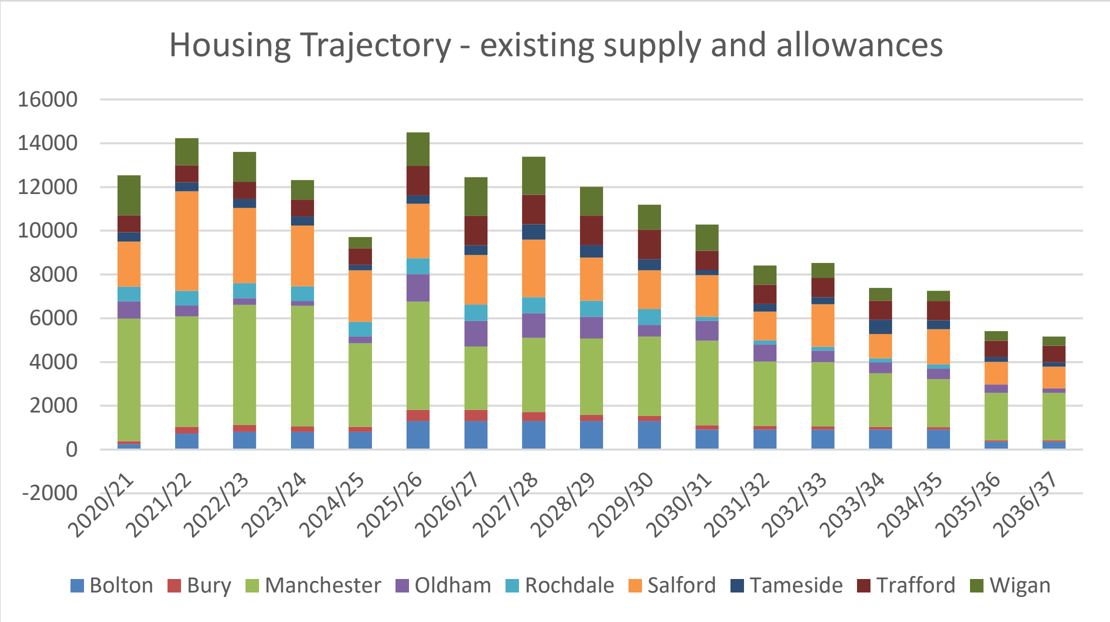
District	Remaining Units available on Sites Under Construction	Sites with Extant Planning Perm / PiP Not Started	Other district SHLAA sites	Small sites windfall allowance	Allowance for losses	**Total 2020-2037**	Post-2037 identified supply
Bolton	1,691	4,668	6,796	2,701	-680	**15,176**	0
Bury	461	801	2,580	261	0	**4,103**	0
Manchester	10,792	5,953	44,977	2,134	-1,329	**62,527**	7,684
Oldham	1,085	1,216	8,097	780	-223	**10,955**	308
Rochdale	1,579	2,198	5,003	207	-990	**7,997**	0
Salford	9,583	12,078	12,583	1,959	0	**36,203**	0
Tameside	845	1,630	3,872	576	0	**6,923**	160
Trafford	3,453	5,115	7,117	777	0	**16,462**	2,996
Wigan	4,080	5,189	7,971	756	0	**17,996**	1,914
PfE total	33,569	38,848	98,996	10,151	-3,222	**178,342**	13,062

Table 0.2: GM Housing Land Supply – trajectory

District	2020-2025	2025-2030	2030-2037	**Total 2020-2037**	Post-2037 identified supply
Bolton	3,401	6,496	5,279	**15,176**	0
Bury	1,259	1,970	874	**4,103**	0

District	2020-2025	2025-2030	2030-2037	**Total 2020-2037**	Post-2037 identified supply
Manchester	25,454	18,353	18,720	**62,527**	7,684
Oldham	2,103	5,076	3,776	**10,955**	308
Rochdale	3,403	3,679	915	**7,997**	0
Salford	15,175	11,107	9,921	**36,203**	0
Tameside	1,894	2,606	2,423	**6,923**	160
Trafford	3,870	6,736	5,856	**16,462**	2,996
Wigan	5,833	7,498	4,665	**17,996**	1,914
PfE total	62,392	63,521	52,429	**178,342**	13,062

Figure 1: Housing Trajectory



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Important Notice – Disclaimer

In relation to the information contained within this report (and any other report relating to the findings of the Places for Everyone Housing Land Supply Statement (PfE HLSS)), please note the following disclaimer, without prejudice:

- The identification of potential housing sites, buildings or areas within the PfE HLSS does not imply that the relevant Local Planning Authority (LPA) would necessarily grant planning permission for residential development. All planning applications incorporating residential development will continue to be treated against the appropriate development plan and material planning considerations. For example, some of the sites identified in the PfE HLSS are currently being used for employment purposes and any planning application to change the use of these sites to residential would be assessed against planning policy that seeks to protect employment land and other material planning considerations;
- The inclusion of potential housing sites, buildings or areas within the study does not preclude them from being developed for other purposes. For example, many of the sites identified are still in employment use and the redevelopment of these for further employment use would generally be considered appropriate;
- The boundaries that are attached to sites, buildings and areas are based on the information available at the time. The PfE HLSS does not limit an extension or contraction of these boundaries for the purposes of a planning application;
- The exclusion of sites, buildings or areas from the study (either because they were never identified or are identified as ‘constrained potential’ or have been ‘discounted’) does not preclude the possibility of planning permission for residential development being granted on them or for these sites to be allocated. It is acknowledged that sites will continue to come forward (particularly small sites) that will be suitable for residential development that have not been specifically identified in the PfE HLSS;
- The categorisation of sites in terms of when they may come forward (short, medium or long term) is based on information held at the base date of the study (1 April 2020). Circumstances or assumptions may change which may mean that sites could come forward sooner or later than originally envisaged. The PfE HLSS does

not prevent planning applications being submitted on any sites identified or excluded within it at any time;

- The information that accompanies the PfE HLSS is based on information that was available at the time of the study and there may be some omissions and/or factual inaccuracies which GMCA does not take liability for. Therefore, users of the PfE HLSS findings will need to appreciate that there may be additional constraints on some sites that were not identified at the time of the survey and that planning applications will continue to be treated on their own merits at the time of the planning application rather than on the information contained within this assessment. Likewise, some of the identified constraints may have been removed since the information was compiled. Issues may arise during the course of a detailed planning application that could not / were not foreseen at the time of the study. Applicants are therefore advised to carry out their own analysis of sites to identify any constraints or other information for the purposes of a planning application and not rely solely on the findings of the PfE HLSS;
- The capacity identified on the sites either relates to the numbers granted within a planning permission (where applicable) or is an estimate based on an appropriate density for the site in question. In arriving at these densities, Officers have taken into account locational and sustainability factors along with issues around local character and general views on the site. However, the capacities identified do not preclude densities being increased on sites, subject to details. Nor does it mean that the densities envisaged within the assessment would be appropriate and these would need to be assessed through the normal planning process when submitting a planning application.
- The study has a base date of 1st April 2020 and the findings are only a ‘snap-shot’ of information held at that time. Therefore, some of the information held on the database will be subject to change over time. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled, whilst planning permissions may have lapsed on other sites. The PfE HLSS will be updated annually and/or at key stages of the preparation of the Joint Plan as necessary.
- An interim update has been completed for Manchester to identify additional supply required to meet the 35% uplift in their Local Housing Need.

Part A – Introduction and Methodology

1) Introduction

1.1.1 The National Planning Policy Framework (NPPF) sets out the national policy direction for the delivery of housing through the planning system. One key objective of the Government is to significantly boost the supply of homes. The NPPF requires strategic policies to make sufficient provision for housing development, looking ahead over a minimum of 15 years from adoption, and provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period. It seeks to make effective use of land by making as much use as possible of land that has been previously developed, including land and buildings that are vacant or derelict.

1.1.2 Paragraph 67 of the NPPF states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

1.1.3 The National Planning Practice Guidance (PPG) states that SHLAAs should provide an assessment of land which is suitable, available and achievable over the plan period. To meet this objective, authorities should identify specific sites and broad locations that will enable continuous delivery of housing over the Local Plan period. Local authorities are also required to identify specific deliverable sites to deliver sufficient housing to meet housing targets over a rolling five-year period.

1.1.4 SHLAA’s are expected to form a key component of the evidence base to support the delivery of housing to meet adopted housing targets, which for the Joint Plan area will be set through the Places for Everyone (PfE) Joint Development Plan.

1.1.5 Each of the nine district's has carried out their own assessment of housing land availability and prepared their own SHLAA. This PfE HLSS brings together information from each of the ten districts to identify the total housing land supply across the Joint Plan area.

1.1.6 It is important to note that whilst this PfE HLSS is an important evidence source to help inform the plan-making process, it will not in itself determine whether a site should be allocated for housing development or whether planning permission would be granted for residential development.

1.1.7 This summary report sets out how the PfE Housing Land Supply summary has been carried out and presents the findings of the assessment.

2) Background

2.1.1 The PfE HLSS forms part of the evidence base to assess the supply of housing land against the joint plan housing requirements. Each district has carried out their own Strategic Housing Land Availability Assessment in accordance with the PPG.

2.1.2 In line with the PPG, SHLAAs should:

- Identify sites and broad locations with potential for development;
- Assess their development potential; and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

2.1.3 The results of the SHLAA can then be used to:

- Help an authority to identify how much housing can be delivered within an area;
- Show whether or not housing targets can be delivered over the plan period (or at least in the short to medium term);
- Demonstrate a continuous, flexible and responsive supply of housing can be provided;
- Provide some comfort to the housebuilding industry about the suitability of

sites with housing potential;

- Provide an evidence base for the decision making process; and
- Help inform other initiatives and strategies that may be undertaken by the nine Local Authorities and GMCA.

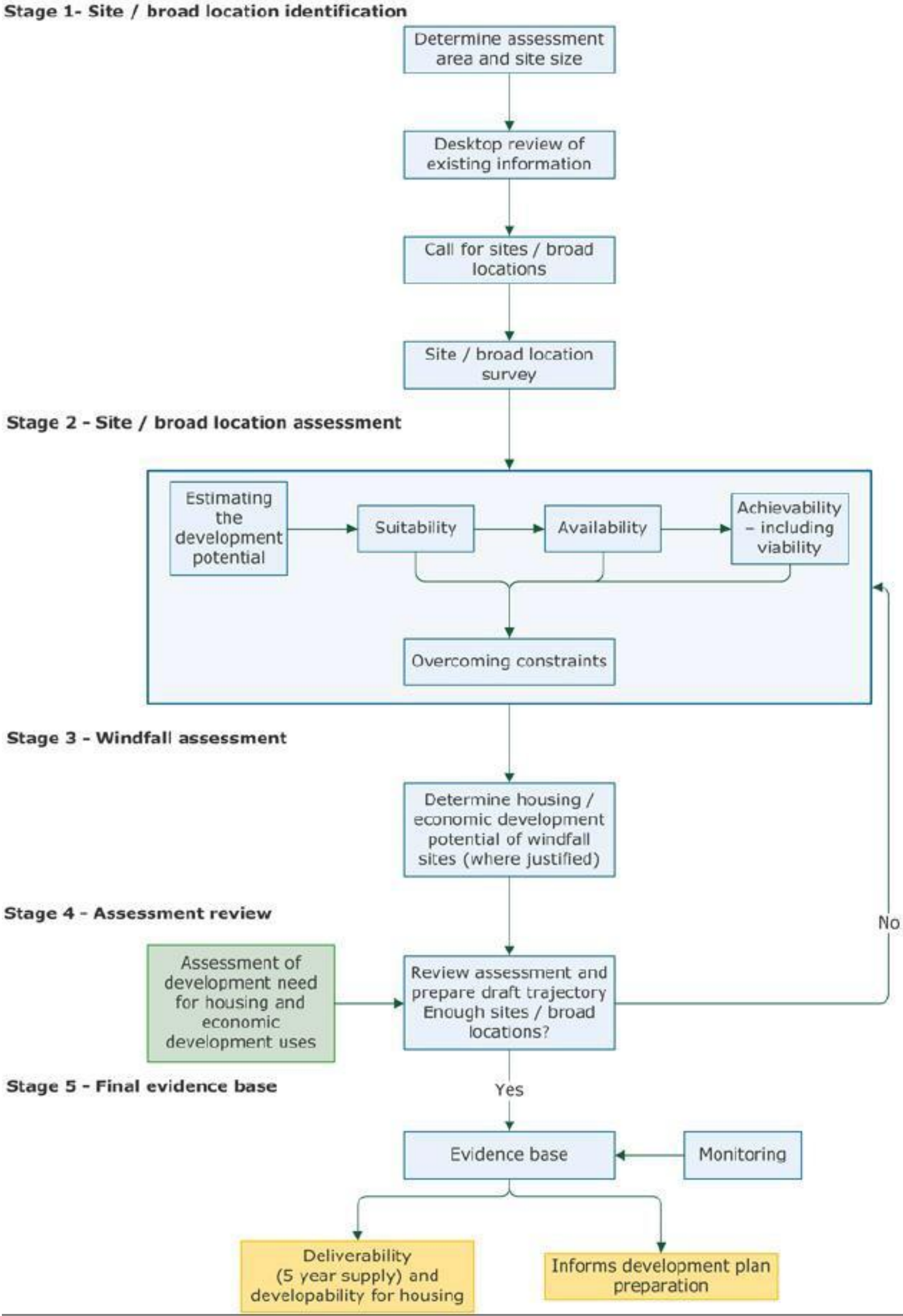
3) Methodology

3.1 Strategic Housing Land Availability Assessments

3.1.1 Each district produces a Strategic Housing Land Availability Assessment (SHLAA) which identifies sites that are considered to potentially be suitable and deliverable for housing. This statement collates the information from each district to provide a summary of the housing land supply, as at 1 April 2020.

3.1.2 The National Planning Practice Guidance (PPG) sets out the methodology for the assessment of land availability as shown in Figure 2:

Figure 2: Land Availability Assessment methodology



3.1.3 Whilst all nine districts apply the above methodology, there are some differences in approach, as set out in relation to each of the stages below.

3.1.4 A note of caution should be applied to the SHLAA data in that inclusion in a SHLAA does not automatically imply that the site will be made available for housing or guarantee that planning permission will be granted. The districts' SHLAAs are technical studies and not policy documents. They identify possible housing sites and assess the overall housing potential but ultimately decisions on which sites would be brought forward for development will be determined through either the local plan process or the planning application process. However, that said, it is considered that this HLSS represents a realistic position in relation to the current supply of sites across the Joint Plan area.

3.2 Stage 1: Site / broad location identification

3.2.1 Districts generally identify sites for inclusion from a combination of some or all of the following:

- Extant planning permissions;
- Allocations;
- Lapsed planning permissions;
- Pre-application discussions;
- Other known developer interest;
- Officer knowledge;
- Regeneration work and masterplanning;
- Clearance sites and derelict land surveys;
- Urban potential studies;
- Council assets;
- Aerial photographs;
- Map analysis;
- Call for sites;
- Original SHLAA produced by consultants;
- Assessments by other parties.

3.2.2 In addition, as part of the plan preparation process, in order to maximise the housing land supply and minimise the need for Green Belt release each district has, as a minimum, undertaken a search for potential housing sites for each of the following:

- Extant planning permissions;
- Allocations;
- Lapsed planning permissions;
- Developer proposals;
- Main town centres;
- Sites in close proximity to public transport nodes, such as train stations and Metrolink stops;
- Existing employment allocations;
- Unimplemented employment permissions;
- Poorly performing employment areas, for example as identified in an employment land review;
- Mills identified in the Greater Manchester mills survey;
- Safeguarded land;
- Protected open land;
- Other greenfield land around the edge of the urban area, informed by the latest open space assessment where available;
- Council-owned land;
- Sites already assessed through the SHLAA that have not been included as deliverable due to policy non-compliance but would nevertheless be preferable to Green Belt development.

Thresholds

3.2.3 The PPG advises that it may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, but that alternative site size thresholds can be considered where appropriate. There are some differences in districts approaches to the size or capacity threshold for inclusion of sites within their SHLAAs.

3.2.4 All districts include all permissions and allocations in their SHLAAs irrespective of size. Bury has no set thresholds for other sites. Manchester has a threshold of 10 or more dwellings for its sites. Rochdale has no threshold except for lapsed permissions (5 or more dwellings). Bolton has a 0.25 hectare threshold.

Oldham has a 0.2 hectare / or sites capable of accommodating at least 5 dwellings threshold, except in town centres and within 800m of transport corridors where no threshold is applied. Salford has a 0.25 hectare threshold, except in the City Centre, Salford Quays, Ordsall Waterfront and town centres where the threshold is reduced to 0.1 hectares. Tameside, Trafford and Wigan have a site size threshold of 5 or more dwellings.

3.3 Stage 2: Site / broad location assessment

Density of development

3.3.1 For sites without planning permission, it is necessary to make assumptions about the potential density of development and capacity that the site could accommodate. Where appropriate districts will make allowances to convert the gross site area to a net developable area when assessing development potential for specific sites. Site yields have been reviewed on sites in more accessible locations, such as within or immediately adjoining town centres and around public transport nodes, in line with emerging GMSF policy which seeks to deliver densities appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport, where this is consistent with local housing market issues, such as a demonstrable need for a particular type of housing; and site-specific issues, such as the design context and any potential impact on the wider landscape or townscape. For sites with existing permissions it is assumed that the site yield will not change, unless information from the developer suggests otherwise.

Net and gross yield

3.3.2 The majority of the GM SHLAAs provide all figures as net, both in terms of specific sites that involve any gains and / or losses of housing and also for any allowances. However, Bolton, Manchester and Rochdale use gross figures for specific sites and where necessary a separate allowance will be made for demolitions and clearances and factored into this assessment.

3.4 Stage 3: Windfall assessment

3.4.1 Windfall sites are defined in the NPPF as "*Sites not specifically identified in the development plan.*"

3.4.2 For the purpose of this report, windfall sites are considered to be sites that are not specifically identified as part of the baseline supply or potential GMSF allocations. Although individual district SHLAAs may currently take differing approaches to windfall assessment, for the purposes of this report analysis has been undertaken to establish a more common approach across all districts.

3.5 Stage 4: Assessment review

3.5.1 The PPG states that once the sites have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing can be provided and at what point in the future. An overall risk assessment should be made as to whether sites will come forward as anticipated.

Build rates and lead in times

3.5.2 Built out rates and lead in times have been determined by each district for their own sites, based on information available and past experience.

3.6 Stage 5: Final evidence base

3.6.1 Although the PPG no longer sets out standard outputs that should be produced from the land availability assessment, the following outputs were previously identified to ensure consistency, accessibility and transparency:

- a list of all sites or broad locations considered, cross-referenced to their locations on maps;
- an assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
- contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;

- an indicative trajectory of anticipated development and consideration of associated risks.

3.6.2 The assessment should also be made publicly available in an accessible form.

3.6.3 The baseline supply of sites is published on MappingGM (see https://mappinggm.org.uk/).

3.7 Interim supply update for Manchester City Council

3.7.1 When the government published its latest methodology for Local Housing Need (LHN) it made no change to the current methodology except to introduce a 35% uplift to the top 20 most populous urban local authorities. Manchester is the only authority in Greater Manchester affected by the uplift. The LHN for Manchester has, therefore, increased from 2,613 to 3,527 per annum.

3.7.2 As a result of a result of having to accommodate the uplift in its LHN, the starting point was for Manchester to endeavour to meet its increased need within the urban area, as per the site selection "rules". Therefore a number of reasonable alternatives were considered to achieve this. Once this work had been undertaken, an interim 2021 housing land supply emerged for Manchester City Council which demonstrates that it can meet its new LHN within the urban area. Although this is an interim update, subject to final adjustments during the normal cycle of land availability updates across Greater Manchester, it is not anticipated that the 2021 SHLAA will vary greatly from that within the interim update. Manchester have found an additional 5,017 units by considering:

- New sites that have become known during 2020/21;
- Sites where there is expected to be a significant change in the number of units to be delivered to those anticipated in the SHLAA 2020; and
- Sites that were in the SHLAA 2020 for post 2037 (therefore not included in the SHLAA 2020 supply for 2020-37) but are now expected to be delivered before 2037.

Part B – Housing Supply

The baseline housing land supply is broken down into a number of categories, as set out in the following sections of this report:

4) Sites under construction;

5) Sites with planning permission;

6) Potential supply – other district SHLAA sites; and

7) Other Allowances.

4) Sites under construction

4.1.1 This section includes sites that have received planning permission and a material start has been made on the implementation of that planning permission. Within this category there will be sites at various stages in the construction process from sites that are nearing completion to sites that are just commencing ground works.

4.1.2 This information provided is based on the position at 1 April 2020 and some of these sites may have been completed since then or additional sites may have commenced. These changes will be picked up in any future updates of this report. The figures include dwellings available and under construction.

Table 3: Sites under construction

District	Number of sites	Site area (hectares)	Houses 2020-2037	Apartments 2020-2037	Total 2020-2037	Post-2037
Bolton	127	101.7	992	699	1,691	0
Bury	55	27.4	304	157	461	0
Manchester	116	94.2	720	10,072	10,792	94
Oldham	135	51.3	873	212	1,085	0
Rochdale	60	72.1	1,381	198	1,579	0
Salford	70	79.1	1,039	8,544	9,583	0
Tameside	79	35.8	598	247	845	0
Trafford	88	70.1	865	2,588	3,453	0
Wigan	127	239.2	3,731	349	4,080	0
PfE total	**857**	**770.9**	**10,503**	**23,066**	**33,569**	94

Note: Number of sites and site area includes sites that are anticipated to deliver housing entirely post-2037.

5) Sites with planning permission

5.1.1 This section includes those sites that had an extant planning permission for residential development, including outline, full permission and permission in principle, at 1 April 2020. Construction may have commenced on some of these sites since then and any change in status will be taken into account in any future updates of this report.

Table 4: Sites with planning permission

District	Number of sites	Site area (hectares)	Houses 2020-2037	Apartments 2020-2037	Total 2020-2037	Post-2037
Bolton	197	138.9	2,597	2,071	4,668	0
Bury	101	31.5	553	248	801	0
Manchester	296	46.9	716	5,237	5,953	349
Oldham	169	85.7	897	319	1,216	0
Rochdale	166	120.6	1,858	340	2,198	0
Salford	176	132.7	1,596	10,482	12,078	0
Tameside	123	42.1	1,143	487	1,630	25
Trafford	87	74.7	1,060	4,055	5,115	2,060
Wigan	207	216.3	4,695	494	5,189	314
PfE total	**1,522**	**889.5**	**15,115**	**23,733**	**38,848**	**2,748**

6) Potential supply – other district SHLAA sites

6.1.1 In addition to sites under construction or with planning permission, SHLAAs include other sites that are constitute part of the housing supply, for example outstanding local plan allocations, sites where planning permission has lapsed, sites identified through site suggestions exercises, masterplanning work and officer knowledge. Table 5 summarises this aspect of the housing land supply.

Table 5: Potential Supply

District	Number of sites	Site area (hectares)	Houses 2020-2037	Apartments 2020-2037	Total 2020-2037	Post-2037
Bolton	128	120.2	4,247	2,549	6,796	0
Bury	89	217.2	1,506	1,074	2,580	0
Manchester	219	491.1	8,570	36,407	44,977	7,241
Oldham	157	158.3	4,407	3,690	8,097	308
Rochdale	124	127.8	3,469	1,534	5,003	0
Salford	118	135.6	2,993	9,590	12,583	0

District	Number of sites	Site area (hectares)	Houses 2020-2037	Apartments 2020-2037	Total 2020-2037	Post-2037
Tameside	103	67.9	1,622	2,250	3,872	135
Trafford	47	265.9	1,758	5,359	7,117	936
Wigan	107	447.8	6,770	1,201	7,971	1,600
GM	**1,092**	**2,031.7**	**35,342**	**63,654**	**98,996**	**10,220**

7) Other Allowances

7.1 Windfall Allowance

7.1.1 Windfall sites are defined in the NPPF as "*Sites not specifically identified in the development plan.*"

7.1.2 For the purpose of this report, windfall sites are considered to be sites that are not specifically identified as part of baseline supply or potential GMSF allocations.

7.1.3 The NPPF and PPG make reference to an allowance for windfalls for housing (where justified). Paragraph 70 of the NPPF states that:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends".

7.1.4 For the purposes of this report, although individual district SHLAAs may currently take differing approaches, analysis has been taken to establish a common approach across all districts.

7.2 Small sites allowance

7.2.1 Small sites that have not currently or previously had planning permission are particularly difficult for Local Authorities to identify as part of the preparation of their SHLAAs, yet such sites will continue to come forward over the plan period. Some districts also apply a site size threshold to their SHLAA site identification process, with such sites accounted for through an overall small sites allowance. The identified housing land supply will therefore undercount the contribution of small sites unless a separate allowance is made.

7.2.2 There is no nationally set methodology for establishing what an appropriate small sites windfall allowance would be. However, a common approach is based on analysis of past trends. There is also no set definition of what would constitute a 'small site'. The nine districts apply different approaches to whether small sites are included within their SHLAAs, and as a result different thresholds have been applied to the calculation of past trends to reflect each districts SHLAA methodology.

7.2.3 Past trends are available for all districts for 2015-2020 as set out in Table 6.

Table 6: Past completions on small sites, 2015-2020

District	2015/2016		2016/2017		2017/18		2018/2019		2019/20		Total 2015-2020	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
Bolton	283	-	208	-	237	-	221	155	191	-	1,140	-
Bury	20	20	32	15	39	31	31	29	39	34	161	129
Manchester	175	-	197	-	158	158	210	210	157	-	897	-
Oldham	25	25	35	35	86	86	109	109	71	71	326	326
Rochdale	4	-	8	-	46	-	16	-	21	21	95	-
Salford	214	193	218	209	237	219	341	314	162	142	1,172	1,077
Tameside	75	52	51	42	67	53	66	58	54	36	313	241
Trafford	34	23	47	42	62	57	152	141	68	61	363	324
Wigan	70	69	63	61	53	43	-	85	61	59	-	317
Plan Area Total	900		859		985							

7.2.4 The thresholds used for the calculation of past trends and the small sites allowance are set out in Table 7. Districts have provided data based on what is appropriate and available for their area.

Table 7: Small site thresholds

District	Threshold
Bolton	<0.25ha
Bury	<5
Manchester	<10
Oldham	<5
Rochdale	<5
Salford	<0.1 and <0.25

District	Threshold
Tameside	<5
Trafford	<5
Wigan	<5

7.2.5 Gross figures for past trends are available for most districts, but only seven districts are able to provide net figures for each of the past five years. Net figures have been used where available. The use of net figures builds in an allowance for small site clearances and changes of use from housing to other uses.

7.2.6 In the case of Bolton, Manchester and Rochdale it is appropriate to use gross figures for windfalls because separate deductions will be made to account for the fact that their baseline supply evidence is only available as gross rather than net data (as set out in 7.3 below). These deductions account for past trends in clearance, demolitions and change of use from housing to other uses, some of which will have been on windfall sites.

7.2.7 This information allows the total delivery on small sites over the period 2015-2020 to be calculated for each district, and hence a per annum average.

Table 8: Small sites – annual past trend

District	Gross 2015-2020	Net 2015-2020	Annual windfalls past trend 2015-2020
Bolton	1,140	-	228
Bury	161	129	26
Manchester	897	-	179
Oldham	326	326	65
Rochdale	95	-	19
Salford	1,172	1,077	215
Tameside	313	241	48
Trafford	363	324	65
Wigan	-	317	63
GM	-	-	908

7.2.8 The small sites allowance will be applied from 2025/26 for the remainder of the plan period (i.e. 2025-2037).

7.2.9 Many small sites that are likely to come forward earlier will already have planning permission and so will be in the baseline supply of specific sites. Within their own SHLAAs some districts apply a small sites allowance from an earlier point in the plan period. This is on the basis that planning applications are valid for three years and therefore permissions on small sites granted in the two years after the base date of the identified supply (i.e. between 1 April 2020 and 31 March 2022) are likely to come forward in addition to those currently within the baseline supply by 31 March 2025.

7.2.10 However, for the purposes of the Joint Plan the decision has been taken to apply the windfalls from 2025/26 as this is a more practical approach based on five-year supply requirements and the data available for all nine districts.

7.2.11 The baseline supply of specific sites includes some small sites that will be delivered for the period 2025 onwards and are below the upper threshold used by districts to calculate their small site past trends, and so these need to be deducted from the projection of past trends to avoid double counting. Table 9 shows the results of this methodology.

Table 9: Small sites allowance calculation

District	Windfalls per annum 2015-2020	Past trend applied to 2025-2037 (1)	Baseline supply on small sites for 2025-2037 (2)	Applied past trend minus baseline supply (1 minus 2)	Average annual allowance
Bolton	228	2,736	35	2,701	225
Bury	26	312	51	261	22
Manchester	179	2,148	14	2,134	178
Oldham	65	780	0	780	65
Rochdale	19	228	21	207	17
Salford	215	2,580	621	1,959	163
Tameside	48	576	0	576	48
Trafford	65	780	3	777	65
Wigan	63	756	0	756	63
Plan area total	908	10,896	745	10,151	846

7.2.12 As set in in Table 9 a small sites windfall allowance of **10,151 dwellings** will be added to the identified baseline land supply from 2025 to 2037. This equates to an average of 846 per year for 12 years. The annual allowance for each district varies depending on when the existing small sites identified within their housing land supply are expected to come forward.

Table 10: Small sites windfall allowance

District	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/25	2035/36	2036/37	Small sites allowance 2025-2037
Bolton	221	221	221	221	221	228	228	228	228	228	228	228	2,701
Bury	8	5	19	25	25	25	25	25	26	26	26	26	261
Manchester	172	179	179	179	179	178	178	178	178	178	179	179	2,134
Oldham	65	65	65	65	65	65	65	65	65	65	65	65	780
Rochdale	15	15	15	15	15	19	19	19	19	19	19	19	207
Salford	130	50	80	183	215	204	215	204	202	193	184	99	1,959
Tameside	48	48	48	48	48	48	48	48	48	48	48	48	576
Trafford	64	64	64	64	64	65	65	65	65	65	65	65	777
Wigan	63	63	63	63	63	63	63	63	63	63	63	63	756
Plan area total	786	710	754	863	895	895	906	895	894	885	877	792	10,151

7.3 Clearances and net/gross adjustment

7.3.1 With the exception of Bolton, Manchester and Rochdale, all districts SHLAAs are based on net completions on identified sites. This means that in most cases there is no need to make a separate allowance for demolition, site clearance or change of use to non-housing uses, as these are already factored in to the baseline supply. Bolton, Manchester and Rochdale record information on gross housing supply and deal with the issue of demolitions / losses separately.

Bolton

7.3.2 In Bolton's case the supply is presented as a gross supply with an allowance of 40 dwelling per annum assumed in terms of demolitions and losses through changes of use or conversion. Although demolitions / losses between 2008 and 2020 have averaged at around 65 per annum this has included some larger 'one off' clearances. Since there are currently no major redevelopment schemes proposed that would result in a large number of demolitions, it is considered that the 40 dwelling per annum allowance is a robust assessment going forward. If this is applied over the GMSF plan period this equates to **680 dwellings** (2020-2037 = 17 years x 40) lost over the period that would need to be replaced through the identified supply.

Manchester

7.3.3 Manchester has historically seen relatively large numbers of demolitions through various regeneration initiatives. Although these have reduced in recent years, there are redevelopment schemes planned with demolitions expected over the next 15 years.

7.3.4 Manchester records losses, where they occur as part of a change of use or residential conversion/remodelling, within the baseline figures. A further adjustment is made for demolitions in two parts:-

- the first considers demolitions predicted as part of planned redevelopment schemes; and
- the second is an assumption for the number of unpredicted small-scale demolitions that occur each year. This figure is based on the average for small scale demolitions over the past 5 years.

7.3.5 Demolitions recorded in the previous 5 years are set out below in Table 11. The demolitions from planned redevelopment schemes are then removed to leave a figure for unpredicted small scale demolitions.

Table 11: Manchester demolitions

Year	All demolitions	Demolitions from redevelopment clearance schemes	Non clearance small scale demolitions
2015/16	64	0	64
2016/17	72	52	20
2017/18	46	0	46
2018/19	233	213	20
2019/20	55	0	55
Average			41

7.3.6 There is no evidence to suggest that there will be a substantial change in average figures over the plan period.

7.3.7 Analysis of planned redevelopment sites suggests there will be approximately 632 planned demolitions over and above the non-clearance small scale demolitions average of previous years (estimated at 95 in 2020-2025, 337 in 2025-2030, 200 in 2030-2035 and 0 in 2035-2037).

7.3.8 Based on the above information, the following demolition allowance will be made for Manchester:

Table 12: Manchester demolition allowance

Allowance	Demolition allowance
Redevelopment schemes	632
Annual figures:	
Average per year 41 x 17 (2020/21 to 2036/37)	697
Total over plan period	1,329

Rochdale

7.3.9 Similar to Manchester, Rochdale has historically seen relatively high levels of clearance again linked to regeneration initiatives such as Housing Market Renewal. In recent years, as the capacity to undertake regeneration has reduced, this had fallen significantly. However, in more recent years, there have been sporadic increases in the number of demolitions recorded which has been due to the activity of Rochdale Boroughwide Housing (RBH) in clearing some of its lower demand stock. Table 13 shows demolitions since 2011.

Table 13: Rochdale demolitions

Year	Demolitions
2011/12	13
2012/13	12
2013/14	5
2014/15	1
2015/16	94
2016/17	170
2017/18	2
2018/19	103
2019/20	1

7.3.10 Since there are significant fluctuations based around the clearance on specific sites, an approach has been taken in Rochdale to make an allowance going forward which takes account of planned clearance along with a smaller allowance of 20 dwellings per annum to cover general demolitions and losses. The most recent information from RBH shows the potential clearance of around 650 dwellings at a rate of around 65 dwellings per annum over the next

10 years (2020-2030). If the general assumption of 20 per annum was added onto this it would give a total over the plan period of **990** (650 + 17x20).

Oldham

7.3.11 The capacity of sites in the housing land supply shows a net figure which already takes account of demolition and replacement. For example, if one house is demolished and replaced by two, the capacity would only show a net gain of one; or if two dwellings are converted into one, a net loss of one would be recorded. However, there are also circumstances where dwellings are cleared or lost but are not replaced by new residential development. For example, houses cleared to make way for wider non-residential redevelopment or through change of use of a dwelling to another use. In previous years, large scale renewal schemes have led to relatively high clearance rates but, more recently, most clearance/loss is on a very small scale.

7.3.12 Oldham's SHLAA has analysed the actual number of planning permissions that would result in the loss of a dwelling (not including demolition and replacement which is already accounted for), and whether the loss has actually taken place (i.e. the dwelling finally lost). The average lost dwellings over the past five years is 5 dwellings per annum. Therefore, this clearance allowance should be subtracted from the net land supply, every year.

7.3.13 For 2020-2025 as well as the average annual clearance allowance calculated as stated above – minus 5 dwellings per year – an additional clearance allowance has been included to account for the large-scale demolition and redevelopment of Crossbank and Summervale House, Vale Drive (SHA2130). The proposed redevelopment of this site will provide approximately 112 homes, which is a net loss of 138 homes across the site compared to the previous site capacity.

7.3.14 As a result, the 138 homes lost through the redevelopment of this site have been added to the annual clearance allowance for the first 5 years (2020-2025), resulting in a clearance allowance of minus 163 homes for the first five years and minus 5 homes per year thereafter up to 2037.

7.4 Summary of other allowances

7.4.1 The allowances for each district are set out in Table 14 with trajectory figures for when the windfalls are expected to come forward presented in Table 15.

Table 14: Other allowances

District	Total windfall allowance 2020-2037	Allowance for losses	Total 2020-2037
Bolton	2,701	-680	2,021
Bury	261	0	261
Manchester	2,134	-1,329	805
Oldham	780	-223	557
Rochdale	207	-990	-783
Salford	1,959	0	1,959
Tameside	576	0	576
Trafford	777	0	777
Wigan	756	0	756
PfE total	10,151	-3,222	6,929

Table 15: Other allowances trajectory

District	2020-2025	2025-2030	2030-2037	Total 2020-2037
Bolton	-200	905 (1,105-200)	1,316 (1,596-280)	2,021
Bury	0	82	179	261
Manchester	-300	346 (888-542)	759 (1,246-487)	805
Oldham	-163	300 (325-25)	420 (455-35)	557
Rochdale	-425	-351 (74-425)	-7 (133-140)	-783
Salford	0	658	1,301	1,959
Tameside	0	240	336	576
Trafford	0	322	455	777
Wigan	0	315	441	756
PfE total	-1,088	2,817	5,200	6,929

7.4.2 Consideration has been given to the application of other windfall allowances for large employment sites, town centres and one public estate. However, the districts have agreed that no other allowances will be made at this time. Further consideration of these types of windfalls is presented in Section 8).

8) Risk assessment

8.1.1 The NPPF seeks to ensure that the planning system delivers a flexible, responsive supply of housing land to meet housing needs. It is considered that this HLSS represents a realistic position in relation to the current supply of sites across the plan area. However, as stated previously, inclusion in a SHLAA does not automatically imply that the site will be made available for housing or guarantee that planning permission will be granted. Through the SHLAA process the districts have identified possible housing sites and assessed the overall housing potential but ultimately decisions on which sites would be brought forward for development will be determined through either the local plan process or the planning application process in conjunction with the housing market.

8.1.2 There is also significant potential for additional sites to come forward for housing that have not specifically been included in the supply and go beyond the small sites windfall allowances made in Section 7) above. It is considered that such sites will provide a degree of flexibility to replace any sites that should drop out of the supply due to unforeseen circumstances.

8.2 Large windfalls

8.2.1 Within their SHLAAs some districts make an allowance for large sites to come forward as windfalls, particularly on employment sites. Many of the districts have a significant stock of employment land as a legacy of their industrial past that is still in current use but may not be suitable or viable for employment use should the sites be vacated by the current occupiers. For some districts such sites have been a regular source of windfall development historically, and are likely to continue to come forward over the Places for Everyone joint plan period.

8.2.2 As these large employment sites are currently in active use and owners have not identified an intention to vacate the site, and only a proportion of sites will come forward for housing, it would not be reasonable to identify such sites within the housing land supply. However, given previous trends and the age, condition, location and suitability of business premises within some areas, the loss of further employment sites to housing is inevitable. Given that the plan will allocate new employment sites in locations that are more attractive to the market, this may result in the relocation of existing businesses thereby freeing up existing employment sites for alternative uses, including housing development.

8.2.3 For example, in Wigan's case a specific windfall allowance is made within their SHLAA for such sites, as these sites have historically been regular source of windfall development due principally to the Borough's significant stock of employment land as a legacy of its industrial past which is no longer needed for, or attractive to the employment market. Where possible such sites are identified in Wigan's SHLAA, but only where it can be demonstrated that they are no longer suitable or viable for continued employment uses, or where planning permission has been granted for housing. Their assessment does not identify employment sites which are in active use and where the owner has not made it clear that they intend to vacate the site as it would not be reasonable to conclude that these sites are currently available, and their inclusion could disadvantage existing occupiers. However, given previous trends and the age, condition, location and suitability of many business premises within the Borough, the loss of further employment sites to housing is considered to be inevitable.

8.2.4 No specific windfall allowance is currently proposed for such sites as part of the land supply due to the inherent difficulties in calculating what an appropriate allowance would be for all districts due to lack of consistent and comparable data on past trends, however there is clear evidence to demonstrate that such sites have come forward in the past and no reason to believe that this will not continue to be the case.

8.3 Town centres

8.3.1 The town centres will be a key component of the overall strategy in the plan, and increasing the number of people living within them is a primary objective in order to increase footfall, add vitality, and support shops and services.

8.3.2 Where possible, town centre sites have been identified within SHLAAs and included as part of the baseline housing land supply. However, in many of Greater Manchester's town centres, the town centre housing market is yet to be properly established, and potential town centre sites may be currently in use, and as such it is difficult to assess the full deliverable housing potential within these areas.

8.3.3 The town centre challenge initiative launched by Mayor Andy Burnham and Greater Manchester Combined Authority seeks to regenerate town centres across Greater Manchester by identifying the ambition for and barriers to delivering change within town centres. It supports the delivery of higher density mixed and affordable housing, creating viable housing markets, bringing stakeholders and partners together to unlock the potential residential development of town centres.

8.4 One public estate

8.4.1 The Government has placed an emphasis on utilising public land for housing, and work is ongoing across Greater Manchester to identify the potential for rationalisation of the public estate and the opportunities that this could provide for housing development. The One Public Estate programme is run jointly by the Local Government Association and the Cabinet Office and has provided funding to GMCA to support unlocking development by rationalising public sector land and buildings.

8.4.2 The GMCA One Public Estate programme has the potential to identify additional opportunities for development that are not currently part of the baseline supply but could contribute to housing delivery over the plan period and provide an additional degree of flexibility if some identified sites fail to deliver as anticipated.

8.5 Greater Manchester funding

8.5.1 In addition to nationally available funding for housing (for example through the Home Building Fund, Barclays and Homes England Housing Delivery Fund, the Government's Housing Infrastructure Fund, Marginal Viability Fund, Land Assembly Fund, Small Sites Fund and Affordable Homes Programme, and the Strategic Housing Infrastructure Fund trailed in the 2020 budget), specific funding is available for housing delivery within Greater Manchester, which will help to overcome viability challenges and support the delivery of new homes.

8.5.2 This includes the Greater Manchester Housing Investment Loan Fund, which has so far committed £510m of funding to support the delivery of 6,886 units across Greater Manchester, with over 3,900 units completed to date. An initial allocation of £81.1m has been made to Greater Manchester through the Brownfield Housing Fund, which will deliver a minimum of 5,500 units over a 5 year period, with further revenue funding to accelerate delivery, and £54.2m allocated to Greater Manchester as part of the Getting Building Fund is being used to support 'shovel ready' sites and will deliver 1,000 new homes, in addition to job creation, road, cycleways and commercial space.

8.5.3 Further details of programmes to support housing delivery are set out in section 6 of the PfE Housing Topic Paper.

8.6 Housing delivery test - Action plans

8.6.1 The Housing Delivery Test measures net additional dwellings provided in a local authority area against the homes required. Results will be published annually by MHCLG.

8.6.2 Where the Housing Delivery Test indicates that delivery has fallen below 95% of their housing requirement over the previous three years, the NPPF requires local planning authorities to prepare an action plan to assess the causes of under delivery and identify actions to increase delivery in future years.

8.6.3 The preparation and implementation of action plans in the Greater Manchester authorities where delivery has fallen below 95% of their requirement will help to address the risks of sites identified within the GM Housing Land Supply not coming forward as anticipated.

9) Housing Land Supply Summary

9.1.1 Table 16 summarises the housing land supply position as at 1 April 2020, based on the information presented in this report.

Table 16: Housing Supply Summary

District	Remaining Units available on Sites Under Construction	Sites with Extant Planning Perm / PiP Not Started	Other district SHLAA sites	Small sites windfall allowance	Allowance for losses	**Total 2020-2037**	Post-2037 identified supply
Bolton	1,691	4,668	6,796	2,701	-680	**15,176**	0
Bury	461	801	2,580	261	0	**4,103**	0
Manchester	10,792	5,953	44,977	2,134	-1,329	**62,527**	7,684
Oldham	1,085	1,216	8,097	780	-223	**10,955**	308
Rochdale	1,579	2,198	5,003	207	-990	**7,997**	0
Salford	9,583	12,078	12,583	1,959	0	**36,203**	0
Tameside	845	1,630	3,872	576	0	**6,923**	160
Trafford	3,453	5,115	7,117	777	0	**16,462**	2,996
Wigan	4,080	5,189	7,971	756	0	**17,996**	1,914
PfE total	33,569	38,848	98,996	10,151	-3,222	**178,342**	13,062

Part C – Analysis of findings

10) Brownfield / Greenfield

10.1.1 Table 17 identifies how much of the identified baseline supply (excluding additional sites and other allowances) is on brownfield, greenfield or mixed sites.

Table 17: Housing supply by land type (2020-2037)

District	Brownfield site count	Greenfield site count	Mixed site count	B'field site area	G'field site area	Mixed site area	B'field capacity 2020-37	G'field capacity 2020-2037	Mixed capacity 2020-2037
Bolton	338	114	0	250.0	110.6	0	10,686	2,469	0
Bury	165	73	7	224.6	38.6	12.9	3,056	424	362
Manchester	518	84	29	383.3	81.1	167.9	49,455	2,591	9,676
Oldham	342	76	43	148.2	56.9	90.1	7,712	1,276	1,410
Rochdale	258	87	5	131.9	172.5	16.0	5,518	2,836	426
Salford	277	65	22	219.3	83.8	44.3	30,634	2,137	1,473
Tameside	218	63	24	90.9	29.7	25.1	5,017	755	575
Trafford	180	32	10	306.7	53.8	50.3	12,293	2,568	824
Wigan	321	118	2	523.0	378.2	2.0	10,769	6,403	68
GM	2,617	712	142	2,278.1	1,005.3	408.7	135,140	21,459	14,814

Note: Sites that are anticipated to deliver housing entirely post-2037 are included in the site count and site area but are excluded from the capacity figures.

10.1.2 Overall 79% of sites, 73% of site area and 87% of the baseline housing land supply is on brownfield or mixed sites. As may be expected given the built up nature of the urban core, Salford and Manchester have the highest proportion of their supply on brownfield or mixed sites. Wigan and Rochdale have the lowest proportion of their supply on brownfield sites.

11) House type

11.1.1 Table 18 splits the identified supply by houses and apartments, with sites split by those with planning permission and those without, where there will be more uncertainty regarding house types to be provided. For sites without full planning permission the house types are indicative based on local knowledge and what is most likely to come forward on the sites. The table excludes windfalls and allowances for losses.

Table 18: Identified housing land supply by house type

District	Houses Count	Houses Percentage	Apartments Count	Apartments Percentage	Total 2020-2037
Bolton	7,836	60%	5319	40%	13,155
Bury	2,363	62%	1,479	38%	3,842
Manchester	10,006	16%	51,716	84%	61,722
Oldham	6,177	59%	4,221	41%	10,398
Rochdale	6,708	76%	2,072	24%	8,780
Salford	5,628	16%	28,616	84%	34,244
Tameside	3,363	53%	2,984	47%	6,347
Trafford	3,683	23%	12,002	77%	15,685
Wigan	15,196	88%	2,044	12%	17,240
GM	60,960	36%	110,453	64%	171,413

11.1.2 There is a clear difference between the house / apartment split, with Manchester, Salford and Trafford identifying over 75% of their supply as apartments, and Wigan only 12% apartments. Across the plan area as a whole, 64% of supply is apartments and 36% is houses, reflective of the higher levels of supply in the urban core of Manchester and Salford.

12) Housing trajectory

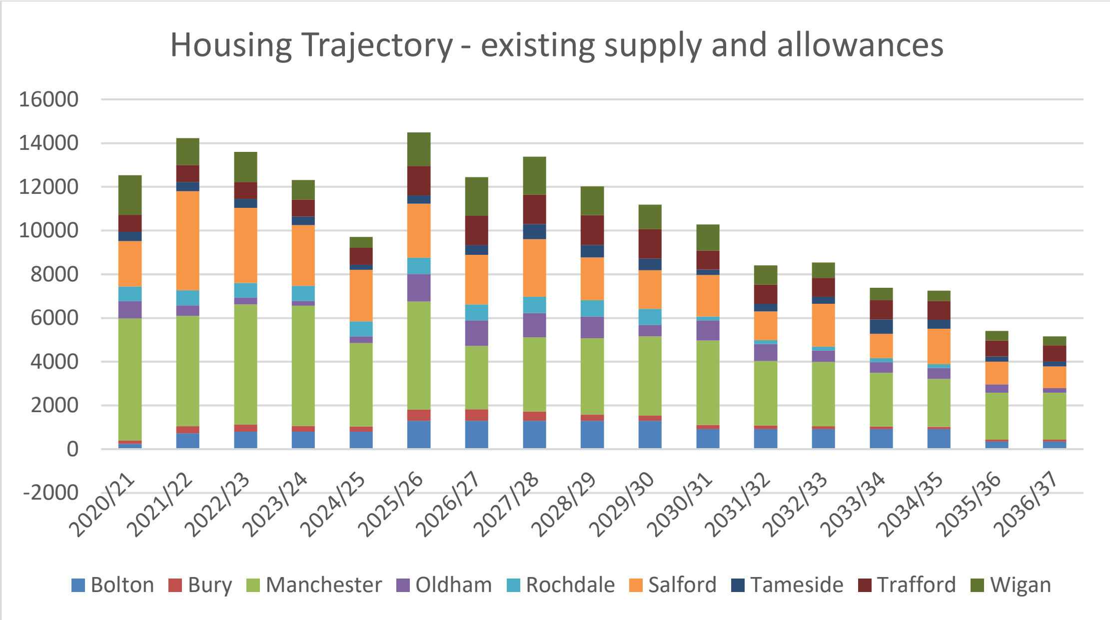
12.1.1 The PPG states that once the sites have been assessed the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing can be provided and at what point in the future. Table 19 sets out this detail based on 2020-2025 (5 years), 2025-2030 (5 years) and 2030-2037 (7 years).

Table 19: GM Housing Land Supply – trajectory 2020-2037

District	2020-2025	2025-2030	2030-2037	Total 2020-2037
Bolton 2020 baseline supply	3,601	5,591	3,963	13,155
Bury 2020 baseline supply	1,259	1,888	695	3,842
Manchester 2020 baseline supply	25,754	18,007	17,961	61,722
Oldham 2020 baseline supply	2,266	4,776	3,356	10,398
Rochdale 2020 baseline supply	3,828	4,030	922	8,780
Salford 2020 baseline supply	15,175	10,449	8,620	34,244
Tameside 2020 baseline supply	1,894	2,366	2,087	6,347
Trafford 2020 baseline supply	3,870	6,414	5,401	15,685
Wigan 2020 baseline supply	5,833	7,183	4,224	17,240
PfE total 2020 baseline supply	**63,480**	**60,704**	**47,229**	**171,413**
Bolton other allowances	-200	905	1,316	2,021
Bury other allowances	0	82	179	261
Manchester other allowances	-300	346	759	805
Oldham other allowances	-163	300	420	557
Rochdale other allowances	-425	-351	-7	-783
Salford other allowances	0	658	1,301	1,959

District	2020-2025	2025-2030	2030-2037	Total 2020-2037
Tameside other allowances	0	240	336	576
Trafford other allowances	0	322	455	777
Wigan other allowances	0	315	441	756
PfE total other allowances	**-1,088**	**2,817**	**5,200**	**6,929**
Bolton total	3,401	6,496	5,279	15,176
Bury total	1,259	1,970	874	4,103
Manchester total	25,454	18,353	18,720	62,527
Oldham total	2,103	5,076	3,776	10,955
Rochdale total	3,403	3,679	915	7,997
Salford total	15,175	11,107	9,921	36,203
Tameside total	1,894	2,606	2,423	6,923
Trafford total	3,870	6,736	5,856	16,462
Wigan total	5,833	7,498	4,665	17,996
PfE total	**62,392**	**63,521**	**52,429**	**178,342**

Figure 3: Housing Trajectory



13) Conclusion

13.1.1 This summary document provides a snapshot of both the committed and potential housing supply across the plan area up to 2037 as of 1 April 2020. The results will be used to inform work on the joint plan. In particular, it will play an important role in providing robust and credible evidence to support the proposed housing targets.

13.1.2 Certain assumptions have been made within each of the district SHLAAs, and stakeholders are invited to submit further information to the relevant district in relation to existing SHLAA sites or proposed additions to the SHLAA for consideration in future updates.