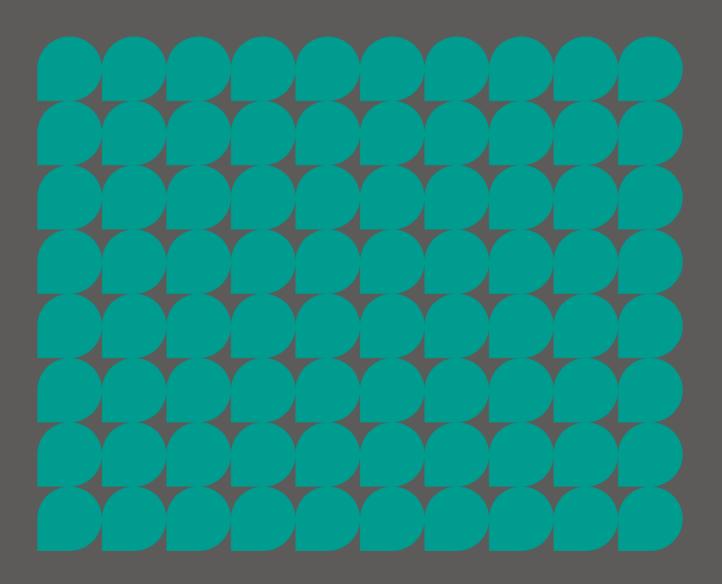


# Places for Everyone Growth and Spatial Options Paper July 2021



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## 1.0 Introduction

- 1.1 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.
- 1.2 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.
- 1.3 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.
- 1.4 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.
- 1.5 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.
- 1.6 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained. This includes being able to:
  - Underpin Greater Manchester's plan for recovery from Covid
  - Support delivery of the Greater Manchester Strategy
  - Provide a framework to manage growth in a sustainable and inclusive way, avoid un-planned development and development by appeal
  - Align the delivery of development with infrastructure proposals
  - Meet the requirement for local authorities to have a local plan in place by December 2023.
  - Meet the Duty to Co-operate in s33A Planning and Compulsory Purchase Act 2004
- 1.7 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.

- 1.8 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. Therefore, this document sets out how the preferred Growth and Spatial Options for the joint plan of the nine have evolved over time, including their origination through the production of the GMSF. It identifies the different growth and spatial options that have been identified as 'reasonable alternatives' to deliver the Plan's Vision and Strategic Objectives and how these have been assessed to inform the selection of a preferred option.
- 1.9 The process of selecting the preferred Options began in November 2015 when an initial consultation was held on possible growth options for the GMSF, alongside the draft Vision and Strategic Objectives. Following that initial consultation, there were subsequent consultations in 2016 and 2019 where reasonable alternatives for the Growth and Spatial Options for the GMSF were assessed.

## 2.0 Growth Options Consultation 2015

2.1 In 2015 the Growth Options covered the broad range of future growth levels to which Greater Manchester could aspire, a summary of the Growth Options is set out in Table
1. It should be noted that in 2015 the GMSF plan period was 2014 to 2035, unlike that of the plan of nine which is 2021 to 2037, to take account of the passage of time.

	Total Housing for 2014- 2035	Average Housing per annum	Total Industry and Warehousing for 2014- 2035	Average Industry and Warehousing per annum	Total Offices for 2014- 2035	Average Offices per annum
Option 1	152,800	7,300	2,526,000	120,300	2,573,300	122,500
Option 2	217,350	10,350	3,452,000	164,400	2,399,000	114,200
Option 3	336,000	16,000	4,050,000	192,900	2,725,000	129,800

Table 1: GMSF Growth Options 2015

2.2 The draft growth options were accompanied by an initial IA which helped to identify where there are differences in how each option responds to the social, economic and environmental objectives in the IA framework. The IA was broad and indicative at this

stage as the growth options did not have sufficient spatial detail to assess how they would perform, comprehensively, against the IA objectives. A summary of the IA for each option is detailed below:

#### 2.3 Option 1: baseline land supply

Option 1 did not perform well against housing and employment provision objectives because it did not meet the objectively assessed housing and employment land needs and consequently would lead to lower levels of growth than the other options. Low levels of growth would also potentially have negative impacts on education, skills and deprivation. Given the lower level of development in this option, it may perform better against objectives related to air quality and climate change than higher growth options. However, there was insufficient detail to fully assess the option against those objectives.

#### 2.4 Option 2: objectively assessed need

Option 2 performed well against housing and employment objectives as it would meet the objectively assessed need. This option will result in levels of development that are higher than those in recent years and consideration should therefore be given to ensuring that this higher growth rate does not result in pressure and reduced access to health and social infrastructure services and does not lead to increased environmental impacts such as increased greenhouse gas emissions and air pollution.

#### 2.5 Option 3: Higher accelerated growth scenario

Option 3 would exceed the objectively assessed need for housing and employment land. However, it has the potential to place pressure on services and resources and would require the development of large areas of land outside of urban areas with associated potential environmental impacts such as increased greenhouse gas emissions and air pollution.

#### 2.6 Preferred growth option

Following the close of the 2015 consultation and the IA of the Strategic Growth Options, further work was completed to update the economic forecasts, resident employment rates and population and dwelling forecasts to respond to comments made during the 2015 consultation. Having completed the additional work it was concluded that Option 2 should be updated to a 2015 base date which would result in the need to plan for 227,200 net new homes, 4,000,000 sq.m industrial and warehousing floorspace and 2,450,000 sq.m of office floorspace). It was concluded that this growth option represented an appropriate growth strategy as it would:

- Continue GM's role in driving growth in the north of England;
- Deliver the GM's requirement to plan for at least the levels of population growth as set out in the 2014 Sub National Population Projects (SNPP); and

- Be consistent with an increase in the resident employment rate delivering on GM's strategic goal to ensure that more residents share in the benefits of economic growth.
- 2.7 In taking this growth option forward it was necessary to take into consideration the outcomes of the IA. The IA in 2016 concluded that whilst this option would result in the needs of Greater Manchester being met, it would be necessary to ensure that its implementation would not result in pressure and reduced access to health and social infrastructure services and would not lead to increased environmental impacts such as increased greenhouse gas emissions and air pollution. Consequently the GMSF 2016 contained a suite of thematic policies which sought to ensure that development proposed through the plan would have an appropriate policy framework to safeguard against these potential negative implications. The policies in the GMSF 2016 in turn were subject to an appraisal against the IA framework.

## 3.0 Assessment of Spatial Options 2016

- 3.1 The Draft GMSF 2016 considered the Spatial Options for delivering Growth Option 2: 'objectively assessed need' from the 2015 assessment. A total of four options were considered and these were subject to IA, using the same objectives and assessment criteria as previously.
- 3.2 Option 1: Existing Land supply (allocations/permissions) The existing land supply option is in effect a "business as usual" scenario. It identified no additional sites, beyond those which have already been identified by districts in their individual housing and employment land supply assessments and sites which might come forward as housing "windfall" sites. It would maintain the current density assumptions which districts have historically applied to their sites. This option would result in a minimal level of development outside the built-up area and would see no changes to the Green Belt boundary to meet the housing and employment needs of GM.
- 3.3 Option 2: Use GM's Existing Land Supply (allocations/permissions) with all sites received through the GMSF call for sites exercise This option consisted of two elements – the yield from those sites in the existing land supply (ie the "do nothing" scenario); and yields from all the sites have received through the call for sites exercise.
- 3.4 This option includes all sites submitted, without applying policy or strategy considerations. Therefore, although it maximises the potential of the existing land supply, it also includes sites outside of the urban area including those within the Green Belt.

- 3.5 Option 3: GM's Existing Land Supply (allocations / permissions) together with strategic allocations to meet the OAN at a GM scale This option would promote allocations which would maximise the opportunity to deliver the type and quality of development needed across the conurbation to deliver GM's Vision. It is designed to deliver the OAN at a GM scale. As such, it would involve redistribution of need between districts to ensure that the most sustainable pattern of development was possible.
- 3.6 Option 4: GM's Existing Land Supply (allocations / permissions) together with strategic allocations to meet the OAN at the individual district level. This option took a similar approach to Option 3, but rather than meeting the GM OAN collectively at the GM scale, it would seek to ensure that each of the ten GM districts was able to meet its own housing requirements with no redistribution between districts.
- 3.7 An assessment of these options was carried out against the Integrated Appraisal framework. Option 1 represented business as usual (i.e. restricting levels of growth to that capable from the existing land supply) and did not meet the OAN. Option 2 would significantly over-deliver housing for GM through development of smaller sites dispersed across the conurbation. Options 3 and 4 would meet the OAN but would require the development of fewer (compared to option 2) large housing and employment sites in doing so.
- 3.8 The assessment found that the significantly increased level of development with options 2, 3 and 4 increases the risks of problems relating to transport, air quality, greenhouse gas emissions and biodiversity loss. The scale of the development would mean that investment in transport and social infrastructure would be needed (particularly under options 3 and 4). Options 2, 3 and 4, which are likely to see extensive development of greenfield sites, were found to have potential negative effects on the development of previously developed land and the best and most versatile agricultural land. Therefore the IA of the spatial options recommended that the development of allocations, to bolster the existing land supply to meet Greater Manchester's OAN, should only be brought forward with a strong policy framework which would reduce risks, maximise social, environmental and economic opportunities and seek to bring about sustainable development.
- 3.9 The IA of the Spatial Options in 2016 concluded that Option 3 was strategic in nature and presented opportunities for large scale investment in housing and employment to meet the OAN and presented an appropriate strategy for delivering a sustainable pattern of growth. Having selected this option as the preferred option, the allocations in the GMSF 2016 set out a detailed policy framework to reduce the potential for negative impacts from the allocations, to maximise the social, environmental and economic opportunities to bring about sustainable development. Each of the allocations and the

thematic policies in the GMSF 2016 were subject to an appraisal against the IA framework.

## 4.0 GMSF 2019 Preferred Growth Options

- 4.1 The preparation of the GMSF was guided by NPPF which continued to make it clear that strategic policies, such as those in the GMSF 2019, should provide for the objectively assessed needs for housing and other uses unless there is sufficient justification to restrict the overall scale and or the adverse impacts would outweigh the benefits.
- 4.2 In 2016 the growth option which met Greater Manchester's objectively assessed needs was appraised through the IA framework. Following that appraisal, an appropriate policy framework was introduced to mitigate the potential impacts of providing for this level of growth.
- 4.3 Although there were significant changes to the detailed content of the GMSF 2019 (from that of the GMSF 2016), the overall Vision of the GMSF remained joint with that of the Greater Manchester Strategy and therefore the overall ambitions of Greater Manchester remained as they had in 2016. Consequently the need to meet Greater Manchester's overall objectively assessed needs (as defined at the time) was considered to be a key objective of the plan, as reflected in the GMSF 2019 Strategic Objectives.
- 4.4 Given the continued Vision for Greater Manchester, the policy framework of NPPF and the outcome of the 2016 appraisal, it was considered appropriate to maintain as the preferred growth option for the GMSF 2019 a strategy which sought to meet Greater Manchester's objectively assessed needs.
- 4.5 The Growth Option for the GMSF 2019 therefore consisted of planning for a minimum of 201,000 new homes, at least 4,220,000 sq.m of new industrial and warehousing floorspace and at least 2,460,000 sq.m of new office floorspace over the plan period 2017-2037.
- 4.6 The number of new homes was designed to meet the needs of Greater Manchester and to provide choice and flexibility in housing delivery. The amount of new industrial and warehousing floorspace and office floorspace was based on an uplift of around 25% of past development rates. The uplift was designed to secure a significant increase in the quality of accommodation across Greater Manchester.

## 5.0 Assessment of Spatial Options 2019

5.1 Whilst there were not considered to be sufficient material considerations to require alternative Growth Options to be assessed to meet Greater Manchester's overall Vision

and the policy framework set by NPPF, the GMSF 2016 consultation responses resulted in the need to reconsider the reasonable alternatives for the spatial options to deliver the preferred level of growth. Therefore six potential spatial options were assessed before a preferred spatial option was chosen for the GMSF 2019.

- 5.2 Six spatial options were considered for the GMSF 2019:
  - Option 1 Business as usual
  - Option 2 Urban max
  - Option 3 Transit City
  - Option 4 Boost northern competitiveness
  - Option 5 Sustain northern competitiveness
  - Option 6 Hybrid Growth Option
- 5.3 An appraisal of these spatial options was carried out and published alongside the GMSF 2019<sup>1</sup>. The assessment of these Spatial Options against the IA objectives showed that each option had some positive elements for Greater Manchester. It also concluded that where potential negative effects were highlighted, there existed potential opportunities for the GMSF to address those particular issues through development of policy which shapes and influences sustainable development.
- 5.4 Option 1 was the 'business as usual' scenario (using only the existing land supply to meet the needs) and as such it would not meet the LHN or employment land need. Option 2 achieved the LHN through significant increases in the density of development in the urban area, which was considered likely to increase pressure on existing infrastructure as well as lead to increased pressure on green spaces. However, neither Option 1 nor Option 2 proposed any Green Belt release to meet the development needs therefore their impacts on the Green Belt were less. Option 3 'Transit City' sought to maximise development in the most sustainable locations around existing transport hubs and town centres across Greater Manchester. This option, although including Green Belt release, was not capable of meeting the LHN as insufficient land could be made available. Option 4 and Option 5 focused development in specific areas of Greater Manchester, the northern districts in Option 4 and the southern districts in Option 5. Whilst both options would meet the need with marginal buffers, they would lead to an uneven distribution of growth across the city region, with both options disadvantaging certain areas of Greater Manchester.
- 5.5 The appraisal of the 2019 options concluded that none of the spatial options 1- 5 individually met the objectively assessed needs and the GMSF Vision and Strategic Objectives, therefore a hybrid spatial option was developed: 'Option 6 Hybrid Growth'. This combined 'Option 3 Transit City', 'Option 4: Boost Northern Competiveness' and 'Option 5: Sustain Northern Competitiveness'. By incorporating elements of several of

<sup>&</sup>lt;sup>1</sup> <u>https://www.greatermanchester-ca.gov.uk/media/1734/draft-gmsf-spatial-options-appraisal-january-2019.pdf</u>

the alternative Spatial Options, this Option drew out specific elements which when combined met the overarching GMSF Vision and Strategic Objectives. Key elements of the Hybrid Option included:

- Optimising the baseline housing land supply, to ensure all opportunities to increase densities and identify additional sites have been explored;
- Concentrating development near to town centres and/or sustainable public transport hubs;
- Taking advantage of existing and planned global assets; and
- Delivering inclusive growth across Greater Manchester, seeking opportunities to boost the competitiveness of north Greater Manchester whilst sustaining the competitiveness of south Greater Manchester.
- 5.6 This became the preferred Spatial Option for the GMSF 2019 and together with the Plan's Vision and Objectives provided the basis for the selection of allocations beyond the urban area. The Housing Topic Paper provides the detailed approach to optimising the baseline land supply to ensure that the land take beyond the urban area was kept to a minimum, this was also reflected in the GMSF 2019. As detailed in the site selection paper, appropriate buffers were placed around town centres and public transport hubs and consideration was given to sites within these locations to increase the supply of land for development. Alongside this, a number of other areas of search were identified, including ones which would enable the districts to take advantage of existing and planned global assets, boost the competitiveness of the districts and deliver long-term sustainable travel options. The full details of these criteria are set out in the Site Selection Report.
- 5.7 Site selection was not, however, purely based on whether a site fell within an area of search or not. Instead, it was critical to consider the sites in the context of the overall spatial strategy. 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:
  - 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
- 5.8 These principles, informed by the results of the site selection criteria, resulted in a number of housing allocations being proposed outside the urban area to bolster the existing land supply and to ensure that the overall Vision and Objectives of the Plan were met.
- 5.9 In terms of employment land, identification of sites was informed primarily by the spatial strategy and the objectives to support strong and continued growth at the core (by focusing the majority of office/commercial development within the core growth areas of Manchester, Salford and Trafford), boost the economic competitiveness of the north (by identifying sites which are transformational in nature and provide for diverse employment opportunities which could not be delivered by the existing land supply) and sustain the competitiveness of the southern area, (by taking advantage of global opportunities presented by the airport and the proposed HS2 route).

## 6.0 GMSF 2020 Growths Options

- 6.1 As part of the process of producing the GMSF 2020 (October 2020), the growth options for the GMSF were re-visited to check if any material changes had arisen since the GMSF 2019 to suggest that another reasonable alternative growth strategy should be considered to deliver the GMSF Vision and Objectives.
- 6.2 As detailed above, in 2019 there were not considered to be sufficient material changes to result in the need to identify a reasonable alternative to the preferred growth option of the GMSF 2016 (i.e. that of meeting Greater Manchester's objectively assessed needs). Therefore, that remained the preferred option for the GMSF 2019. However through the responses to the GMSF 2019 a number of comments were received suggesting that a growth option should be considered that limited Greater Manchester's growth to the existing land supply (similar to that which was considered as Growth Option 1 in 2016). Additionally it was proposed that a growth option should be needed to meet Greater Manchester's local housing need (similar to that which was considered as Option 3 in 2016). Therefore, given that representations were received to suggest that alternative growth options should be considered, although they had previously been assessed in 2016 it was considered appropriate to assess them afresh in 2020, alongside the 2019 preferred Growth Option.
- 6.3 In addition to this, in March 2020 the UK was hit by the pandemic caused by the Coronavirus (Covid-19) outbreak and the country went into a national lockdown. This health induced lockdown had an immediate impact on the UK economy and therefore

consideration was given to whether or not a reasonable alternative growth option, to those already identified, should be identified as result of this health induced shock to the economy.

- 6.4 Although the economic impacts Covid-19 were of an unprecedented speed and severity, the causes of this shock are complex. They are rooted in the way government and society have responded to the pandemic. It was therefore a health-driven economic crisis which made it different in nature to all previous recessions, certainly since the Second World War.
- 6.5 It was considered that a range of factors could affect the recovery, including the path of the virus and the health response, consumer and business confidence and action, government responses and the impact of government policy responses. However, at the time of producing the GMSF 2020, it was considered not possible to predict the impacts of the pandemic on either the UK or the GM economy in terms of both the overall economy and the sectoral split of activity.
- 6.6 Covid-19 was however seen as a material factor, to which consideration should be given in preparing the GMSF. But, given the levels of uncertainty around the impacts of Covid-19 and the various paths out of recovery, at both the national and regional level, it was seen as too premature to produce a new set of forecasts for future population, GVA and jobs growth which could be translated into a fourth reasonable growth alternative for the period covered by the GMSF. That said its delivery rates were reviewed in the early years of the plan period.
- 6.7 The fact that there was insufficient certainty to devise an alternative growth option, was not however, considered reason enough to pause the production of the GMSF. There was no indication when this certainty may be achieved and in the meantime strategic planning in Greater Manchester and therefore its recovery would either be paused or carry on in an unplanned fashion. Not only would this have been at odds with Greater Manchester's recovery programme, it would also have been contrary to Government policy which sets out that the planning system should be truly plan-led and that all local planning authorities should have up to date plans in place. Given this and the fact that provision is made in Government policy to regularly (at least every five years) review and update policies in local plans, it was considered reasonable to proceed on the basis of the three alternatives in terms of growth options for Greater Manchester. However, as set out in Government policy, the GMSF 2020 acknowledged that it would be regularly reviewed and if necessary, the policies within it would be updated.
- 6.8 The fact that since the publication of the GMSF 2019 all ten districts and the Greater Manchester Combined Authority have declared a climate emergency and have a desire to meet expertly determined carbon budgets did not in itself result in a further reasonable alternative emerging. Instead, this was correctly embedded in the

assessment of the GMSF 2020 reasonable alternatives through the Integrated Assessment (IA) framework (and additionally the assessment of the GMSF 2020 itself). Following specific consideration as to whether or not the framework was appropriate in light of the fact that each of the ten GM districts had declared climate emergencies the independent consultants, who carried out the IA, concluded that the appraisal framework was appropriate to assess the growth and spatial options and the policies in the plan against these matters. Therefore, this process enabled the assessment of the Growth and Spatial Options in the light of the declared climate emergencies and the desire to meet expertly determined carbon budgets, in so far as is appropriate and practicable in the preparation of a development plan document.

- 6.9 In light of the above the following three Growth Options were assessed to identify the preferred Growth Option in the GMSF 2020:
  - Option 1: Business as usual.
  - Option 2: Meeting GM's Local Housing Need (LHN) and employment land Objectively Assessed Needs.
  - Option 3: Higher Growth scenario, going above GM's LHN and Employment land needs.

<u>Growth Option 1: Business as usual – Limiting the level of growth to that capable of being delivered by the 2020 existing housing and employment land supply.</u>

- 6.10 The business as usual growth option would see the level of growth (and distribution) being limited to what would be capable of being delivered by GM's currently identified existing housing and employment land supply over the plan period 2020-2037, as at March 2020. A similar growth option has been considered previously, however, as it was proposed through consultation responses to the GMSF 2019, it has been considered appropriate to assess it again against the 2020 GMSF 2020 Vision and Strategic Objectives. This growth option would equate to:
  - Housing 176,665 dwellings
  - Industrial and warehousing -1,965,913 sq.m
  - Offices -3,330,871 sq.m

#### <u>Growth Option 2: Meeting GM's Local Housing Need (LHN) and employment land</u> <u>Objectively Assessed Needs.</u>

- 6.11 This growth option would see Greater Manchester meeting its overall housing and employment land needs. Over the plan period (2020-2037) this would require GM to identify sufficient land for the delivery of:
  - Housing 179,078 dwellings
  - Industrial and warehousing 4,100,000 sq.m
  - Offices 2,500,000 sq.m

6.12 Whilst this option would ensure that sufficient land was made available to meet the overall housing and employment land needs over the lifetime of the plan, there could be a slower level of growth in the early (up to first five) years of the Plan period, to take account of short-term impacts from the Covid-19 pandemic.

Growth Option 3: Meeting a higher level of new housing growth than GM's LHN

- 6.13 As part of their response to the GMSF 2019 consultation, the Housing the Powerhouse Campaign group put forward a growth option which suggested a higher level of housing than that proposed in the GMSF 2019. The Campaign stated that instead of using GM's LHN as the housing target, the GMSF should use a '*figure that goes beyond the 227,000 homes included in the Outline of a Prospective Housing Package for Greater Manchester'*. Although this option proposed "going beyond 227,000 homes", the level "beyond" was not quantified therefore this option assumes the delivery of 227,000 new homes over the lifetime of the plan, i.e. up to 2037.
- 6.14 Similarly the campaign group did not suggest an overall employment land target in this scenario. However, in order to undertake an assessment of this growth option the employment land target needs to be quantified. As there is no prescribed methodology to do this, the employment land target for this option has been calculated based on an estimate of the number of jobs that 227,000 dwellings would demand in the industrial and warehousing and office sectors and equating that to a land requirement.
- 6.15 As this option was proposed through the GMSF 2019 consultation process, there is no specific account taken of potential short-term impacts from the Covid-19 pandemic. Over the plan period (2020-2037) this would equate to sufficient land being identified for the delivery of:
  - Housing 227,000 dwellings
  - Industrial and warehousing 4,348,000 sq m
  - Offices 2,814,000 sq m
- 6.16 Based on the assessment carried out in 2020, each of the three growth options were considered to have positive impacts in terms of delivering the overall GMSF Vision and Strategic Objectives. However, option two appeared to perform well against all. Therefore, option two was chosen as the preferred growth option for the GMSF 2020. Similarly to the GMSF 2016 and GMSF 2019, the GMSF 2020 proposed a detailed policy framework which sought to reduce the potential for negative impacts from the proposed level of growth and the specific allocations, to maximise the social, environmental and economic opportunities to bring about sustainable development. This included ways in which Greater Manchester would be meeting its ambitions in relation to carbon reduction. Additionally, each of the allocations and the thematic policies in the GMSF 2020 were informed by the iterative process of the Integrated Assessment.

As set out in section 1 of this report, Section 28 of the Planning and Compulsory 6.17 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. It is considered that the joint plan of the nine GM districts has substantially the same effect as the GMSF 2020 would have had on the nine districts, thus enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations. Given this, it follows that the Places for Everyone Plan (PfE 21) should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore "the plan" which is being assessed is one and the same. Therefore, the iterative work in relation to the GMSF Growth and Spatial Options and the environmental assessments carried out in relation to these draft plans remain valid (including their scope). That said, consideration has been given below, as to the impact of Stockport's withdrawal on both the growth and spatial options which has in turn been considered against the IA framework and an addendum report has been prepared assessing the changes between GMSF 2020 and PfE 2021 Growth and Spatial Options.

## 7.0 GMSF 2020 Spatial Options

- 7.1 In a similar way to revisiting the Growth Options, the Spatial Options were revisited as part of the process of producing the GMSF 2020 to identify whether any material changes had arisen since the GMSF 2019 and/or whether other reasonable alternative(s) to the GMSF 2019 Spatial Options existed which should be assessed against the GMSF Vision and Objectives.
- 7.2 As outlined in Section 5, six spatial options were identified and assessed in 2019, however three were combined into the GMSF 2019 preferred "Hybrid Option". However, following the GMSF 2019, two additional reasonable alternative Spatial Options emerged, one being a 'public transport max' option and the other a 'decentralisation/sub-urbanisation' option to take account of some of the potential uncertainty around the impacts of the Covid-19 pandemic. These reasonable alternatives were assessed alongside the Business as Usual; the Urban Max and the GMSF 2019 preferred "Hybrid Option" as alternatives in the preparation of the GMSF 2020.
- 7.3 As discussed in Chapter 6, in relation to the Growth Options, although Covid-19 has clearly had an impact on Greater Manchester, it was concluded that insufficient evidence existed to develop a reasonable spatial option for delivering the preferred level of growth as a result of Covid-19. Therefore no realistic alternative emerged as a direct response to Covid-19, however, some elements in the five GMSF 2020 spatial options (particularly those in option 5) could be likened to some behavioural changes in

the immediate aftermath of the pandemic, but for which there is no certainty that they would continue.

- 7.4 Five spatial options were therefore developed and considered as part of the preparation of the GMSF 2020. This section summarises the five reasonable spatial alternatives and assesses their ability to deliver the GMSF Vision and Strategic Objectives.
- 7.5 The GMSF 2020 Spatial Options were:
  - Option 1 Business as usual
  - Option 2 Urban max
  - Option 3 Public Transport Max
  - Option 4 GMSF 2019 Spatial Option
  - Option 5 Decentralisation/sub-urbanisation

#### Spatial Option 1 – Business as usual

- 7.6 This Option projects forward existing development trends. New housing and employment sites are those which are already identified in the existing housing and employment land supply (as at March 2020) and which have been subject to an optimisation process to ensure efficient use of land. The existing supply includes sites which are allocated in an adopted district Local Plan, have planning permission or are otherwise identified as being available for development over the lifetime of the Plan.
- 7.7 The existing housing land supply is focused in and around the urban area, including the city centre (Manchester and Salford), town centres and other locations in and around the urban area. The industrial and warehousing supply is focused on existing employment locations, with higher density development in the City Centre and the Quays as well as lower density development in locations such as Trafford Park. The business as usual option includes no Green Belt release.

#### Spatial Option 2 – Urban max

7.8 Option 2 would maximise housing growth in and around the urban area by significantly increasing densities on sites in the existing housing land supply in accordance with the density assumptions below. Close to a centre is defined as being within 800m of a defined centre boundary. It would use the existing land supply for employment growth, due to the lack of appropriate sites. This Option does not anticipate Green Belt release.

Location	Minimum net residential density (dwellings per hectare)
City Centre	200
Town Centres	200
Other designated centres	120
Other locations	70

#### Spatial Option 3 Public Transport Max

- 7.9 This option uses the increased density ratios set out in Option 2, however the highest densities would also be applied close to sustainable transport nodes whether within a defined centre or not, with the highest densities being applied close to multi modal sustainable public transport hubs.
- 7.10 Close to a sustainable transport node or multi modal hub is defined as being within 800m of that facility. Public transport hubs included in this option are Metrolink stops, Bus Rapid Transit stops and Railway Stations with at least 2 trains per hour. These are considered to be the most sustainable existing locations and development in these areas will take advantage of existing assets close to these transport nodes. Similarly, to the Urban Max Option, it would use the existing land supply for employment growth due to the lack of appropriate sites. This option does not anticipate Green Belt release.

#### Spatial Option 4 GMSF 2019 Spatial Option

- 7.11 Following the assessment of the spatial options for the 2019 GMSF, this option was chosen as the preferred approach to deliver the distribution of growth across GM because none of the alternative options assessed in 2019 were considered, on their own, to fully deliver the GMSF Vision and Objectives. Also, this option had the least negative impact on economic, social, environmental and health objectives in the 2019 Integrated Assessment appraisal framework. In the 2019 Spatial Options Report this option was identified as a 'Hybrid Growth Option' as it combined the 'Transit City Option' with the 'Boosting Northern Competitiveness' and 'Sustaining Southern Competitiveness' spatial options.
- 7.12 In light of the outcome of the assessment in 2019, the fact that this spatial option was the preferred option in 2019 and that no evidence has been put forward to suggest that this is no longer a reasonable alternative, it was taken to be a reasonable alternative for the GMSF 2020, rather than its individual component parts.
- 7.13 For the GMSF 2020, this option used the existing housing land supply at March 2020, which has been subject to an optimisation process, as well as sites which are currently outside of the urban area but which are within 800m of a town centre or sustainable

public transport hub. It also utilises information from the site selection process in relation to the sites outside the urban area which has been updated to reflect emerging evidence. This option therefore seeks to deliver sites which, when combined, would meet the overarching GMSF Vision and Strategic Objectives as detailed in Section 5 above. It takes advantage of the most sustainable locations in Greater Manchester but it also includes sites which take advantage of existing and planned global assets, as well as strategically important locations which have the potential to deliver transformational change. Whilst this option includes sites with these benefits and where new development could have a regenerative effect on an adjacent area of derivation, it does require limited Green Belt release.

#### Spatial Option 5 Decentralisation/sub-urbanisation

- 7.14 The overall trend of this option would be that growth in the Core Growth Area, in particular the City Centre, would be reduced and redistributed to the edges of the urban area, due to a number of factors, including:
  - Increased levels of homeworking and the City Centre becoming less of a focus for: work; a place to do business; shopping; retail; leisure; and eating.
  - Increased role for smaller town centres, local and neighbourhood centres
  - Reduced confidence in high density apartment living in the City Centre and trend for people to seek to live on the outskirts of Greater Manchester in low density developments.
  - New and existing offices downsize and/or relocate to the edge of the urban area in locations accessible predominantly by car.
  - Increased demand for low density out-of-town retail outlets and leisure destinations that are accessible by car become more popular.
  - Online retail increases, which in turn creates a greater demand for industry and warehousing floorspace on the outskirts of GM.
- 7.15 This option assumes an anticipated shift away from future growth in the City Centre and the main town centres. Whilst there is insufficient evidence to provide certainty of what level of shift could be expected over the next 15 to 20 years, it would seem reasonable, in the context of developing spatial options, to consider this could be in the order of approximately 30%. It would therefore lead to less residential and employment land becoming available in these locations with some growth being redistributed to edge of and beyond the urban area.
- 7.16 Based on the assessment carried out in 2020, each of the spatial options have positive impacts to a greater or lesser extent in terms of delivering the overall GMSF Vision and Strategic Objectives. However, it was considered that option four performed well against all objectives. Therefore, option four was chosen as the preferred spatial option for the GMSF 2020. However, as part of the appraisal of this spatial option in 2019, a number of proposed mitigations were identified for the GMSF, should this Spatial Option be chosen as the preferred option. These mitigations were identified to ensure that the policy framework contained within the GMSF reduced the potential for negative

impacts from future development, including the allocations and maximised the social, environmental and economic opportunities to bring about sustainable development. Appendix 1 of this paper sets out the difference this appraisal had on the GMSF 2020 text.

7.17 As set out in section 1 of this report, 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. It is considered that the joint plan of the nine GM districts has substantially the same effect as the GMSF 2020 would have had on the nine districts, thus enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations. Given this, it follows that the Places for Everyone Plan (PfE 21) should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore "the plan" which is being assessed is one and the same. Therefore, the iterative work in relation to the GMSF Growth and Spatial Options and the environmental assessments carried out in relation to these draft plans remain valid (including their scope). That said, consideration has been given below, as to the impact of Stockport's withdrawal on both the growth and spatial options which has in turn been considered against the IA framework and an addendum report has been prepared assessing the changes between GMSF 2020 and PfE 2021 Growth and Spatial Options.

## 8.0 Preparation of Places for Everyone 2021

- 8.1 As part of the process of producing the Places for Everyone Plan, the growth and spatial options for the plan were re-visited to check if any material changes had arisen since the GMSF 2020 to suggest that other reasonable alternative(s) to the growth and spatial options should be considered to deliver the Plan's Vision and Objectives. As part of this it was important to consider the following issues:
  - What role the work carried out in relation to the GMSF 2020 Growth and Spatial Options have in the preparation of the PfE 2021
  - Whether the responses received to the GMSF 2019 remain valid in the context of a joint plan of nine of the ten GM local authorities
  - The impact of Stockport's withdrawal on the housing and employment growth needs and the land supply
  - Whether there was more certainty as to the impact of Covid 19 or the Brexit deal
  - Whether the withdrawal of Stockport, in itself, would result in other reasonable growth and/or spatial option(s) emerging and

- Whether any new evidence, including in relation to the districts' approach to climate change, has resulted in other reasonable alternative(s) emerging.
- 8.2 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. Given that all nine districts wish to maintain the momentum achieved by the GMSF and maximise the use of the extensive, previously prepared, evidence base to ensure that they all able to meet the Government's 2023 deadline for having an up to date Plan, there is a clear rationale for producing a Plan of the nine that would have substantially the same effect as the GMSF 2020 would have had. On this basis, it follows that the work carried out in relation to the GMSF Growth and Spatial Options remains valid in relation to the preparation of the PfE 2021.
- 8.3 The responses received to the GMSF 2019 growth and spatial options remain valid in relation to the preparation of the PfE 2021 Plan, due to the iterative nature and scope of the PfE 2021 compared to the GMSF. As such, the alternative growth options submitted in 2019 are still considered to be reasonable alternatives in respect of the PfE 2021. Therefore in addition to meeting the OAN of the nine districts, it is considered that two additional alternatives exist. One limits the growth to the existing land supply of the nine districts and the other proposes an increased level of growth over and above that of the OAN of the nine districts. Although these two alternatives remain valid, the withdrawal of Stockport has resulted in a reduction in the OAN of the PfE Plan area and similarly a reduction in the overall land supply of the nine districts making up the PfE 2021 Plan area. This will be taken into consideration in devising the quantum and distribution of development being proposed under the PfE 2021 Growth and Spatial Options.
- 8.4 In terms of quantifying the amount of growth in the increased growth option, it should be noted that as the consultation response suggesting this option did not specifically quantify the proposed growth for the individual districts, an adjustment, based on the 2021 OAN for Stockport has been made to the figure originally assessed as part of the GMSF 2020 preparation, to take account of Stockport's withdrawal from the Plan. A potential alternative/addition to this option could have been to propose to meet some of Stockport's need in the PfE Plan area. Whilst it is true that Stockport was not meeting all its OAN in the GMSF 2020, the spatial distribution of growth was based on the overall strategy, not the identification of one district's ability or otherwise to meet its needs. Given the embryonic stage reached in the preparation of Stockport's local plan, Stockport Council has not currently established whether or not it will have any surplus/unmet need and if so, what alternatives it has considered for meeting this unmet need. Therefore, it is not possible to identify what such an option might look like

in relation to the PfE 2021 and consequently it is not considered to be a reasonable alternative to the proposed growth in PfE 2021.

- 8.5 Consequently, similar to the GMSF 2020 work, three reasonable alternatives for growth have been identified for the PfE 2021. Consideration of these against the Plan's Vision and Objectives is provided below.
- 8.6 Consideration has also been given to the impact of Stockport's withdrawal on the reasonable alternatives for spatial distribution, the Spatial Options. Although in similar way to the conclusion in relation to the Growth Options, the removal of Stockport, in itself, is not considered to have resulted in a unique spatial alternative, it is necessary to consider whether the changes to the Plan period and the nine districts' identified needs, as a direct result of Stockport withdrawing and changes in the LHN methodology could have an impact on the spatial distribution provided in the GMSF 2019 Hybrid Option. Consequently two variants of the Hybrid Option are considered below, one which proposes the removal of Stockport's allocations alone and one which proposes taking reasonable steps to minimise the loss of Green Belt across the nine districts, whilst still maintaining sufficient supply to meet the identified needs of the nine districts. As part of this option consideration will be given to the wider evidence base, including the Green Belt harm assessment, the need to establish defensible Green Belt boundaries, the impact on the overall land supply. Therefore, in the analysis of the Spatial Options below, in effect six options are considered against the Plan's Vision and Objectives.
- 8.7 In addition to the above, as part of the preparation of the PfE 2021, further consideration has been given to whether or not there is any more certainty in relation to the Covid pandemic or the Brexit deal, full details of this can be found in the Covid-19, EU-Exit and the Greater Manchester Economy Implications for the Places for Everyone Plan. However, in summary the report concludes that as in 2020, there remains a high degree of uncertainty about future events and their implications and consequently there is not sufficient certainty/evidence currently available to inform a robust "reasonable alternative" growth or spatial option for purposes of the PfE 2021.
- 8.8 It is also worth noting that the comprehensive evidence base assembled to support the policies and proposals in the GMSF 2020 has been updated in the light of the change to the PfE 2021, including that in relation to economic and housing growth and transport and where necessary, addendum reports have been produced. However, none of this work has resulted in other reasonable alternatives to the GMSF 2020 Growth and Spatial Options emerging.

## 9.0 Places for Everyone Vision and Objectives

9.1 The GMSF 2019 adopted the vision included within the Greater Manchester Strategy. No significant objection was raised to this approach through the consultation on the GMSF 2019. Therefore it was considered to be appropriate to use the Greater Manchester Strategy's Vision in the GMSF 2020 as it still reflected GM's overall ambitions in terms of securing inclusive economic growth and offering opportunities for GM to rapidly recover a strong and successful economy through its "Build Back Better Campaign". As set out in Section 1 of this report, the plan of nine has been prepared on the basis that it will have substantially the same effect on the remaining nine districts as the GMSF 2020 would have had. Therefore, given that no significant objections were received to the Vision during the 2019 consultation and there have been no significant material reasons to alter it, the plan of nine Vision remains as per that of the GMSF 2020 and the Plan is seen by the nine districts as one of the key ways they can support the achievement of Greater Manchester's collective vision:

Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:

- A place where all children are given the best start in life and young people grow up inspired to exceed expectations.
- A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand you'll get it.
- A place of ideas and invention, with a modern and productive economy that draws in investment, visitors and talent.
- A place where people live healthy lives and older people are valued.
- A place at the forefront of action on climate change with clean air and a flourishing natural environment.
- A place where all voices are heard and where, working together, we can shape our future.
- 9.2 The GMSF 2019 had nine strategic objectives (1-9 below). Although comments were received in relation to these through the 2019 consultation, they focused on their implementation and not the principle of their inclusion in the GMSF or what they were seeking to achieve. Therefore, it was considered that they remained appropriate to delivering GM's ambitions. However subsequent to the formal consultation period, and as a direct result of engagement with the GM Health and Social Care Partnership, the need for a tenth objective to be included in the GMSF was identified (the 10th objective listed below). Collectively these objectives were identified to support the Vision for Greater Manchester and were included in the GMSF 2020. The PfE 2021 Objectives remain the same as those in the GMSF 2020, albeit subject to minor amendments as necessary to reflect the fact that the Plan relates to nine, not the ten Greater Manchester districts:
  - 1. Meet our housing need
  - 2. Create neighbourhoods of choice
  - 3. Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester

- 4. Maximise the potential arising from our national and international assets
- 5. Reduce inequalities and improve prosperity
- 6. Promote the sustainable movement of people, goods and information
- 7. Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region
- 8. Improve the quality of our natural environment and access to green spaces
- 9. Ensure access to physical and social infrastructure
- 10. Promote the health and wellbeing of communities
- 9.3 These ten Strategic Objectives were appraised as part of the Integrated Assessment carried out in 2020. That appraisal did not result in the need to make changes to the Strategic Objectives. Given the very minor amendments made to the Objectives to reflect Stockport's withdrawal, there was no change made to the assessment of these Objectives in 2021. Therefore it remains appropriate to assess the Growth Options against these, together with the Vision, as it is important for the preferred growth and spatial options to enable Greater Manchester to achieve its overall ambitions.

## 10.0 Places for Everyone Growth Options

- 10.1 As set out above, it is considered that the three Growth Options assessed during the preparation of the GMSF 2020 remain valid to the preparation of the PfE, albeit as they relate to the nine districts not the whole of Greater Manchester. Consideration therefore needs to be given as to whether the withdrawal of one district has impacted on the conclusions reached in 2020 in terms of their suitability. The three reasonable alternative Growth Options for the PfE 2021 are:
  - Option 1: Business as usual.
  - Option 2: Meeting the nine districts' Local Housing Need (LHN) and employment land Objectively Assessed Needs.
  - Option 3: Higher Growth scenario, going above the nine districts' LHN and Employment land needs.

<u>Growth Option 1: Business as usual – Limiting the level of growth to that capable of being delivered by the 2020 existing housing and employment land supply.</u>

10.2 The business as usual growth option would see the level of growth (and distribution) being limited to what would be capable of being delivered by the nine districts' currently identified existing housing and employment land supply over the plan period 2021-2037, based on data as of March 2020. Data for March 2021 is currently not available, although an interim update has been made to the land supply for Manchester City Centre to address the 35% uplift in their LHN. Due to a lack of alternative options, but the requirement to meet this additional need, the additional land supply in Manchester has been found within the urban area, predominantly on sites previously anticipated to

be developed beyond the Plan period. An estimation has also been made for completions in all districts during 2020/21, to reflect the change in the Plan's start date from 2020 to 2021. The estimated completions has been based on the districts GMSF 2020 targets for the year 2020/21. This growth option would equate to:

- Housing 163,456 dwellings
- Industrial and warehousing 1,805,509 sq.m
- Offices 3,129,271 sq.m

Whilst this option identifies sufficient land for future office need, it does not provide sufficient for industry and warehousing or housing. The amount of land identified for new homes is very close to that of the combined local housing need of the nine districts, however, it must be noted that evidence prepared in relation to the viability of the land supply indicates that much of it faces challenges which will delay some of the supply from coming forward until funding and/or more confidence in the housing market exists. This means that adopting a growth option based on this land supply would prevent the districts being able to demonstrate that they could meet their objectively assessed needs as required by policy.

<u>Growth Option 2: Meeting the nine districts' Local Housing Need (LHN) and</u> <u>employment land Objectively Assessed Needs.</u>

- 10.3 This growth option would see the nine districts meeting their overall housing and employment land needs. Over the plan period (2021-2037) this would require the identification of sufficient land for the delivery of:
  - Housing 164,880 dwellings
  - Industry and warehousing 3,330,000 sq.m
  - Offices 1,900,000 sq.m
- 10.4 Whilst setting a target based on this option would ensure that the districts would meet the overall housing and employment land needs over the lifetime of the plan, it will require sufficient additional land to be identified and made available to ensure that these targets are deliverable. Given the profile of the land supply and the continued uncertainty caused Brexit and Covid-19, as with the GMSF 2020, a slower level of growth in the early years of the Plan period (up to 2025) is anticipated, to take account of short-term impacts from the Covid-19 pandemic and Brexit and to ensure that new, green field sites can be brought forward in sufficient time.

<u>Growth Option 3: Meeting a higher level of new housing growth than the nine districts'</u> LHN

10.5 As part of their response to the GMSF 2019 consultation, the Housing the Powerhouse Campaign group put forward a growth option which suggested a higher level of housing than that proposed in the GMSF 2019. The Campaign stated that instead of using GM's LHN as the housing target, the GMSF should use a '*figure that goes beyond the* 227,000 homes included in the Outline of a Prospective Housing Package for Greater *Manchester*'. Although the group's option proposed "going beyond 227,000 homes", the level "beyond" was not quantified therefore, this option uses 227,000 new homes over the lifetime of the plan, i.e. up to 2037 as the starting point for calculating this option for the nine districts.

- 10.6 As this representation was made in respect of a plan for the ten districts, it would be reasonable for the nine districts to make a reduction in the overall growth within this option, to take account of the withdrawal of Stockport. Given the current status of Stockport's local plan it is considered reasonable to reduce the level of growth in this option by Stockport's LHN.
- 10.7 The campaign group did not suggest an overall employment land target in this scenario. However, in order to undertake an assessment of this growth option the employment land target needs to be quantified. As there is no prescribed methodology to do this, the employment land target for this option was calculated as part of the preparation of the GMSF 2020, based on an estimate of the number of jobs that 227,000 dwellings would demand in the industrial and warehousing and office sectors and equating that to a land requirement. As part of the preparation of the PfE 2021 it has been necessary to calculate the employment land figures for the nine districts, excluding Stockport. Using these calculations, it is possible to identify what level of need could be attributed to Stockport. Therefore it is considered reasonable to reduce the employment land growth assumed under this option for GMSF 2020 by the employment land need for Stockport (identified in the 2021) for both offices and industry and warehousing.
- 10.8 As this option was proposed through the GMSF 2019 consultation process, there is no specific account taken of potential short-term impacts from the Covid-19 pandemic. Over the plan period (2021-2037) this would equate to sufficient land being identified for the delivery of:
  - Housing 209,608 dwellings
  - Industry and warehousing 4,108,000 sq m
  - Offices 2,654,000 sq m
- 10.9 As set out above, the conclusion in 2020 was that each of the three growth options had positive impacts in terms of delivering the overall GMSF Vision and Strategic Objectives. However, option two appeared to perform well against all. Therefore, option two was chosen as the preferred growth option for the GMSF 2020. Similarly to the GMSF 2016 and GMSF 2019, the GMSF 2020 proposed a detailed policy framework which sought to reduce the potential for negative impacts from the proposed level of growth and the specific allocations, to maximise the social, environmental and economic opportunities to bring about sustainable development. This included ways in which Greater Manchester would be meeting its ambitions in relation to carbon reduction. Additionally, each of the allocations and the thematic policies in the GMSF 2020 were informed by the iterative process of the Integrated Assessment.

10.10 The assessment below considers the PfE 2021 Growth Options against the Plan's Vision and Strategic Objectives. As can be seen, it is considered that the withdrawal of Stockport from the Plan has had little, if any material impact on the assessment and therefore, as with the GMSF 2020, Option 2 was selected as the preferred Growth Option.

## 11.0 Assessment of PfE 2021 Growth Options against PfE 2021 Vision and Strategic Objectives

11.1 This section provides an assessment of the three potential growth options against the PfE 2021 Vision and the Strategic Objectives. This will enable a view to be reached as to which option(s) best fit the overall ambitions of the nine districts. In each section, the table highlights if it is considered that the change from GMSF 2020 to PfE 2021 has had a significant material effect on the conclusions reached in relation to the GMSF 2020.

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
PfE Vision	This option could only in part meet the Vision. Restraining the level of growth to existing levels and distribution of land supply would restrict the nine districts' ability to meet their full ambitions and would limit their contribution to growth across the whole conurbation	This option would enable the nine districts to provide the right number of homes and jobs to allow them to fulfil their ambitions and play their part in contributing to GM's Vision overall	Providing more land than is needed to meet GMs housing and employment needs could put more pressure on GM's environment and could hinder activity in relation to climate change and air pollution.
Significant change since GMSF 2020?	No	No	No
Meet our housing need	In numerical terms the existing housing land supply is less than the nine LHN figure, albeit marginally. Additionally there is evidence prepared on behalf of the	Whilst this growth option would set a target based on GM's overall local housing need, as required by NPPF it would also enable sufficient land to be	This option would exceed the target set by the local housing need calculation methodology. Therefore it would require the identification of sufficient land to meet a target

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 new homes together with levels of employment growth to provide jobs for the resultant increased population
	nine districts to show that some of this land has challenges in terms of deliverability, particularly in the early years as funding comes on stream and confidence increases in the housing market. Therefore it would not be capable of achieving this objective and would therefore be contrary to NPPF. Despite the addition of an allowance to take account of currently unidentified sites that may become available over the lifetime of the plan, the level, type and distribution of the land supply would remain insufficient. This would be in terms of its ability to meet the overall vision objectives, particularly those relating to delivering inclusive growth across the conurbation, but also in terms of providing sufficient flexibility to ensure deliverability over the plan period, including	identified to meet the overall vision objectives, particularly those relating to delivering inclusive growth across the conurbation and provide sufficient flexibility to ensure delivery over the plan period. It would also enable sufficient land to be made available to address the delivery concerns with some of the existing land supply.	beyond the needs of the nine districts. It would result in an even larger amount of land being identified beyond the urban area, in order to provide sufficient flexibility in delivery.

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
	taking into consideration matters of viability.		
Significant change since GMSF 2020?	No	No	No
Create neighbourhoods of choice	A larger proportion of the existing land supply is brownfield land and/or within the urban area	Although this growth option would mean more non- brownfield land would need to be identified, the majority of land would required to meet the target would be brownfield and/or within the urban area and close to existing transport hubs as it is within the existing land supply.	This growth option would result in a more significant amount of additional land being identified away from the Core Growth Area and town centres and would mean that it would be more difficult to prioritise the use of sustainable modes of transport
Significant change since GMSF 2020?	No	No	No
Playing our part in ensuring a thriving and productive economy in all	Although this option would prioritise brownfield land, it would not be capable of delivering an adequate supply of employment land. In turn it would enable the	This option would identify adequate employment land which whilst prioritising brownfield land could also facilitate an appropriate mix of	This growth option would result in an increased level of employment land being identified which although it could mean a thriving economy across GM, there would be a higher

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
parts of Greater Manchester	nine districts play their part in ensuring that all parts of GM would benefit from a thriving and productive economy as it would rely on the existing level and distribution of employment land.	sites and premises to ensure the nine districts are able to play their part in delivering a thriving and productive economy across GM.	proportion of sites on greenfield land which could in turn have a negative impact on the delivery of brownfield sites.
Significant change since GMSF 2020?	No	No	No
Maximise the potential arising from our national and international assets	Relying as it does solely on the existing land supply this option would not maximise the potential arising from all GM's national and international assets. In turn it would limit the access for local people to employment in these locations.	Identifying sufficient land to meet the OAN for employment means that this growth option will enable the nine districts to maximise the potential arising from national and international assets, whilst delivering other objectives such as prioritising brownfield land and would minimise the need to identify land in locations reached by less sustainable modes of transport.	Although this growth option would utilise brownfield land supplies and enable the nine districts to maximise the potential arising from national and international assets, it is likely to result in land being identified in locations not easily reached by sustainable modes of transport which could make it difficult for local people to access the jobs.

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
Significant change since GMSF 2020?	No	No	No
Reduce inequalities and improve prosperity	Relying as it does solely on the existing land supply this option would not meet the objectively assessed needs for employment therefore it could not guarantee that all the Plan area's communities would have access to employment opportunities. Similarly, relying on existing land supply would limit the ability to strengthen the competitiveness of north GM and secure inclusive growth.	This option would meet the objectively assessed needs for employment therefore provide access to employment opportunities. In not relying solely on the existing land supply it would offer opportunities to strengthen the competitiveness of north GM thereby reducing inequalities and improving prosperity.	Although this growth option would identify employment land to match the needs of the increased housing growth, it is likely to result in land being identified in locations not easily reached by sustainable modes of transport which could make it difficult for local people to access the jobs and therefore it could limit the opportunities reduce inequalities.
Significant change since GMSF 2020?	No	No	No
Promote the sustainable movement of	Given that this option focuses on the existing, urban land supply, much of it will be close to sustainable transport hubs.	As this growth option would require the need for new land to be identified, it offers opportunities to expand the	This option would see an increased target for both housing and employment which could lead to less focus on sites near to

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 new homes together with levels of employment growth to provide jobs for the resultant increased population
people, goods and information	However, where new potential opportunities for sustainable growth have been identified, these may not be implementable, with associated impacts upon local economic productivity.	transport infrastructure to meet wider inclusive growth objectives and will enable the districts (and wider GM) to capitalise on national and regional transport investment, whilst seeing the majority of development within the urban area, close to existing transport hubs	sustainable transport hubs and an increased demand for additional sites in locations with more significant travel demand impacts.
Significant change since GMSF 2020?	No	No	No
Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city- region	Given that this option focuses on the existing, urban land supply, it will help to promote sustainable patterns of development however there will be reduced opportunity to encourage carbon neutrality in new development as a significant part of the existing land supply already has agreed planning permission.	Given that this option uses as its starting point the existing, urban land supply, it will help to promote sustainable patterns of development. It will offer increased opportunity to encourage carbon neutrality in new development given the level of development which	This option would see an increased target for both housing and employment and although there would be more new development, offering increased opportunities to encourage carbon neutrality, it is likely to encourage greater levels of growth and associated travel demand at the expense of the districts' (and GM's) total carbon

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
		would be subject to new policies.	budgets, requiring even more challenging carbon emission reductions per capita.
Significant change since GMSF 2020?	No	No	No
Improve the quality of our natural environment and access to green spaces	As this option focuses on the existing land supply there could be fewer opportunities to create new green spaces and potentially more pressure on the existing environment and green spaces.	This option could lead to less pressure on existing green spaces and more opportunities to improve the quality of the natural environment and access to green spaces.	Whilst this option could improve the quality of the natural environment and access to green spaces as part of new development it could lead to more pressure on existing green spaces as it would result in a higher level of development than that needed to meet districts' needs.
Significant change since GMSF 2020?	No	No	No
Ensure access to physical and social infrastructure	As this option is focused on the existing land supply it could result in a greater reliance on existing levels of physical and social infrastructure and may provide	This option assumes that the districts' objectively assessed needs for housing and employment would be met and provides the opportunity to	This option would result in greater housing and employment land being identified than needed therefore, whilst it could provide opportunities to deliver new infrastructure through new development, it is likely that

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 <b>new homes together with</b> <b>levels of employment growth to</b> <b>provide jobs for the resultant</b> <b>increased population</b>
	fewer opportunities to improve their quality and distribution.	deliver new physical and social infrastructure.	there could be even greater pressure on the existing physical and social infrastructure and therefore potentially restricting access for some community groups to this infrastructure.
Significant change since GMSF 2020?	No	No	No
Promote the health and wellbeing of communities	This option would rely on the existing land supply and therefore could limit the opportunities to identify new opportunities to address current inequalities in terms of health and wellbeing of residents and to promote the health and wellbeing of communities.	In meeting the objectively assessed needs of the districts, this option could provide new opportunities to promote the health and wellbeing of communities by restricting the level of new development in unsustainable locations.	As this option would result in a higher employment and housing target than that needed, it could offer opportunities to identify new ways to promote the health and wellbeing of communities, but these benefits are likely to be undermined by the potential negative impact on the health and wellbeing of communities as a result of the need for more unsustainable trips to reach services as more development is likely to be unsustainable locations.

Growth Option	1. Business as Usual The level (and distribution) of growth capable of being delivered by the nine districts' existing housing and employment land supply as identified at March 2020.	2. Meeting the nine districts' overall housing and employment land needs over the lifetime of the plan with lower levels of growth in the early years of the Plan period to take account of short-term impacts from the Covid-19 pandemic and Brexit.	<b>3. Delivering a minimum of</b> 209,608 new homes together with levels of employment growth to provide jobs for the resultant increased population
Significant change since GMSF 2020?	No	No	No

11.2 Based on the assessment in the table above, as with the GMSF 2020, each of the three growth options could be considered as having positive impacts in terms of delivering the overall PfE Vision and Strategic Objectives. However, similarly to GMSF 2020, option two appears to perform well against all. Therefore, option two has been retained as the preferred growth option for the PfE 2021. As was the case with the GMSF 2020, in retaining this as the preferred Growth Option, the PfE 2021 maintains a detailed policy framework which seeks to reduce the potential for negative impacts from the allocations, to maximise the social, environmental and economic opportunities to bring about sustainable development. Each of the allocations and the thematic policies in the PfE 2021 have been informed by the iterative process of the Integrated Assessment which was carried out in relation to the GMSF. An assessment has been carried out in 2021, to determine the impact of the changes made to the PfE 2021 from the GMSF 2020, following the withdrawal of Stockport.

## 12.0 PFE 2021 Spatial Options

- 12.1 As detailed above, the Spatial Options assessment carried out in relation to the GMSF 2020 remains valid to the preparation of the PfE 2021 and the withdrawal of Stockport in itself has not resulted in a new and unique reasonable alternative(s) emerging (and nor should any be no longer considered reasonable). However, as detailed above, Stockport's withdrawal has resulted in the emergence of two variants of the GMSF 2019 Spatial Option. Therefore, as part of consideration as to whether the withdrawal of one district has impacted on the conclusions reached in 2020 in terms of their suitability, these two variants will be considered. The six reasonable alternative Spatial Options for the PfE 2021 are as follows:
  - Option 1 Business as usual
  - Option 2 Urban max
  - Option 3 Public Transport Max
  - Option 4 GMSF 2019 Spatial Option
  - Option 5 Decentralisation/sub-urbanisation

#### Spatial Option 1 – Business as usual

- 12.2 This Option projects forward existing development trends. New housing and employment sites are those which are already identified in the existing housing and employment land supply (as at March 2020) and which have been subject to an optimisation process to ensure efficient use of land. The existing supply includes sites which are allocated in an adopted district Local Plan, thosewhich have planning permission and those which are considered to be suitable for residential development. The housing land availability assessments have been prepared in line with national policy and guidance.
- 12.3 The existing housing land supply is focused in and around the urban area, including the city centre (Manchester and Salford), town centres and other locations in and around the urban area. The industrial and warehousing supply is focused on existing employment locations, with higher density development in the City Centre and the Quays as well as lower density development in locations such as Trafford Park. The business as usual option includes no Green Belt release. As with the Growth Options, data for March 2021 is currently not available, although an interim update has been made to the land supply for Manchester City Centre to address the 35% uplift in their LHN. Additionally an estimation has been made for completions during 2020/21, to reflect the change in the Plan's start date from 2020 to 2021.

#### Spatial Option 2 – Urban max

12.4 Option 2 would maximise housing growth in and around the urban area by significantly increasing densities on sites in the existing housing land supply in

accordance with the density assumptions below. Close to a centre is defined as being within 800m of a defined centre boundary. It would use the existing land supply for employment growth, due to the lack of appropriate sites. This Option does not anticipate Green Belt release.

Location	Minimum net residential density (dwellings per hectare)
City Centre	200
Town Centres	200
Other designated centres	120
Other locations	70

### Spatial Option 3 Public Transport Max

- 12.5 This option uses the increased density ratios set out in Option 2, however the highest densities would also be applied close to sustainable transport nodes whether within a defined centre or not, with the highest densities being applied close to multi modal sustainable public transport hubs.
- 12.6 Close to a sustainable transport node or multi modal hub is defined as being within 800m of that facility. Public transport hubs included in this option are Metrolink stops, Bus Rapid Transit stops and Railway Stations with at least 2 trains per hour. These are considered to be the most sustainable existing locations and development in these areas will take advantage of existing assets close to these transport nodes. Similarly, to the Urban Max Option, it would use the existing land supply for employment growth due to the lack of appropriate sites. This option does not anticipate Green Belt release.

#### Spatial Option 4 GMSF 2019 Spatial Option

12.7 Following the assessment of the spatial options for the 2019 GMSF, a Hybrid Growth Option was chosen as the preferred approach in that draft of the GMSF to deliver the distribution of growth across GM because none of the alternative options assessed in 2019 were considered, on their own, to fully deliver the GMSF Vision and Objectives. Also, it was considered that this option had the least negative impact on economic, social, environmental and health objectives in the 2019 Integrated Assessment appraisal framework. In the 2019 Spatial Options Report this option was identified as a 'Hybrid Growth Option' as it combined the 'Transit City Option' with the 'Boosting Northern Competitiveness' and 'Sustaining Southern Competitiveness' spatial options.

12.8 In light of the outcome of the assessment in 2019, the fact that this spatial option was the preferred option in 2019 and that no evidence was put forward during the 2019 consultation, to suggest that this is no longer a reasonable alternative, this spatial option was considered to be a reasonable alternative for the GMSF 2020, rather than its individual component parts. However, as detailed above, due to the changes to the OAN and the Plan period as a direct result of Stockport's withdrawal and changes to the LHN methodology, it has been considered necessary to assess whether or not options exist within this overall hybrid option. As a direct result of this, two variants have been identified within this overall option, Option 4(a) and Option 4(b).

#### Option 4(a) – Maintain Spatial Distribution Constant in Nine PfE Districts

- 12.9 Following the withdrawal of Stockport from the joint plan, this option sees the removal of all the proposed GMSF 2020 allocations in Stockport. It does not propose any other changes to the Plan in the remaining nine districts.
- 12.10 This Option uses the existing housing land supply at March 2020, which has been subject to an optimisation process, as well as sites which are currently outside of the urban area but which are within 800m of a town centre or sustainable public transport hub. It has also been further increased to ensure that Manchester City can meet its new (December 2020) LHN including the 35% uplift which must be met within its administrative boundaries. This additional land supply has been derived from an interim analysis of the land supply in Manchester City. It includes new sites which have emerged over the last 12 months and also the re-examination of sites which had previously been anticipated for development beyond the Plan period. This has enabled Manchester to continue to meet its own LHN within its urban area, yet maintain the overall objective of inclusive growth. Therefore, it was not necessary to consider an option to release further Green Belt in Manchester City in order to meet this increased LHN.
- 12.11 This option also utilises land supply information in relation to the sites outside the urban area which has been updated to reflect emerging evidence. This option therefore takes advantage of the most sustainable locations in Greater Manchester but it also includes sites which take advantage of existing and planned global assets, as well as strategically important locations which have the potential to deliver transformational change. Whilst this option includes sites with these benefits and where new development could have a regenerative effect on an adjacent area of derivation, it does require limited Green Belt release.

12.12 This Option does not, however, enable the remaining nine districts to consider reasonable opportunities to reduce the overall land supply to a level more similar to that proposed in the GMSF 2020, particularly given the change to Plan period from 2020 to 2021. In turn, preventing such consideration could result in more Green Belt being released than is necessary, albeit only marginally.

# Option 4(b) – Reflect Changes in the Plan Period in the Spatial Distribution of Nine PfE Districts

- 12.13 In addition to the removal of all the proposed GMSF 2020 allocations in Stockport, following the Council's decision to withdraw from the joint plan, this option seeks to enable the remaining nine districts to consider reasonable opportunities to reduce the overall land supply to a level more similar to that proposed in the GMSF 2020 and thereby identify reasonable opportunities to further reduce the loss of Green Belt.
- 12.14 As with Option 4(a), this Option uses the existing housing land supply at March 2020, which has been subject to an optimisation process, as well as sites which are currently outside of the urban area but which are within 800m of a town centre or sustainable public transport hub. It has also been further increased to ensure that Manchester City can meet its new (December 2020) LHN including the 35% uplift which must be met within its administrative boundaries. This additional land supply has been derived from an interim analysis of the land supply in Manchester City. It includes new sites which have emerged over the last 12 months and also the re-examination of sites which had previously been anticipated for development beyond the Plan period. This has enabled Manchester to continue to meet its own LHN within its urban area, yet maintain the overall objective of inclusive growth. Therefore, it was not necessary to consider an option to release further Green Belt in Manchester City in order to meet this increased LHN.
- 12.15 This option also utilises land supply information in relation to the sites outside the urban area which has been updated to reflect emerging evidence. This option therefore takes advantage of the most sustainable locations in Greater Manchester but it also includes sites which take advantage of existing and planned global assets, as well as strategically important locations which have the potential to deliver transformational change.
- 12.16 Unlike Option 4(a), Option 4(b) enables consideration to be made of the change in Plan period and its impact on the overall development targets for the nine districts and the resultant relationship to the overall land supply. Due to the change in Plan period and the assumptions made in relation to

the estimated completions for the year 2020/2021, the level of overall land supply, relative to the targets has increased. Therefore, this option enables consideration to be given as to whether or not any opportunities exist to reduce any of the allocations and in turn overall Green Belt loss. Whilst most districts had an increased supply, relative to their overall targets in the Plan, it is necessary to consider the wider evidence base (including the Green Belt and viability evidence) when identifying any such opportunities. As a result of this wider consideration, reasonable opportunities exist in Manchester, Oldham and Salford. The nature of the allocations and the wider evidence base in the remaining six districts is such that appropriate opportunities were not identified in these.

12.17 Therefore, whilst this option includes sites with a range of benefits (as set out above) and where new development could have a regenerative effect on an adjacent area of derivation, it does require Green Belt release and there will be limited opportunities to reduce that over and above Option 4(a).

#### Spatial Option 5 Decentralisation/sub-urbanisation

- 12.18 The overall trend of this option would be that growth in the Core Growth Area, in particular the City Centre, would be reduced and redistributed to the edges of the urban area, due to a number of factors, including:
  - Increased levels of homeworking and the City Centre becoming less of a focus for: work; a place to do business; shopping; retail; leisure; and eating.
  - Increased role for smaller town centres, local and neighbourhood centres
  - Reduced confidence in high density apartment living in the City Centre and trend for people to seek to live on the outskirts of the Plan area in low density developments.
  - New and existing offices downsize and/or relocate to the edge of the urban area in locations accessible predominantly by car.
  - Increased demand for low density out-of-town retail outlets and leisure destinations that are accessible by car become more popular.
  - Online retail increases, which in turn creates a greater demand for industry and warehousing floorspace on the outskirts of the Plan area.
- 12.19 This option assumes an anticipated shift away from future growth in the City Centre and the main town centres of approximately 30%. It would lead to less residential and employment land becoming available in these locations with some growth being redistributed to edge of and beyond the urban area.

## 13.0 Assessment of PfE 2021 Spatial Options against PfE 2021 Vision and Strategic Objectives

13.1 The table below provides an assessment of the five potential Spatial Options against the PfE 2021 Vision and Strategic Objectives. This will enable a view to be reached as to which option(s) best fit the overall ambitions of the nine districts and which should form the preferred option for the PfE 2021.

Spatial	1. Business as	2. Urban Max	3. Public	4. (a) GMSF 2019	4. (b) GMSF 2019	5. Decentralisation/
Option	Usual. Housing – 163,456 dwellings Industrial and warehousing – 1,805,509 sqm Offices – 3,129,263 sqm	Housing – 167,624 dwellings Industrial and warehousing – 1,623,744 sqm Offices – 3,024,153 sqm	Transport Max Housing – 214,493 dwellings Industrial and warehousing – 1,623,744sqm Offices – 3,024,153sqm	Spatial Option Housing – 183,810 dwellings Industrial and warehousing – 3,965,389 sqmOffices – 3,150,763 sqm	Spatial Option Housing – 182,819 dwellings Industrial and warehousing – 3,960,389 sqm Offices – 3,150,763 sqm	Suburbanisation Housing – 182,819 dwellings Industrial and warehousing – 3,858,220 sqm Offices – 3,150,763 sqm Of which approx. 30% would be displaced from the city and town centres: 30,000 dwellings, 11,000 sqm Industrial and warehousing, 680,000 sqm offices.
GMSF Vision	This option could only in part meet the Vision. The existing supply of land supply is insufficient to meet the needs of the nine districts and would lead to a distribution that would restrict the	Whilst maintaining growth within the confines of the urban area and meeting the numerical housing needs, this option would see the urban area	This option would maximise growth mainly within the confines of the urban area and close to existing public transport nodes. Whilst it would meet the numerical housing needs, this option would see the urban area	This option would deliver a full range of housing in attractive neighbourhoods close to public transport links. Important urban greenspace would be protected and would be within	This option would deliver a full range of housing in attractive neighbourhoods close to public transport links. Important urban greenspace would be protected and would be within easy reach for the existing and future population helping to create	Increased vacancies in city/main town centres both in terms of previously developed land and buildings. This option would see a significant reduction of housing and employment growth opportunities

	ability to contribute towards Greater Manchester's ambitions across the whole conurbation particularly in terms of ensuring that all residents have access to a decent home and a fulfilling job.	become over- developed with high density housing. It would lead to a lack of access to greenspace for our communities which could impact on their ability to lead healthy lives. It would also restrict the opportunities to create a productive economy as it would rely on the existing land supply	become over- developed with high density housing. It would lead to a lack of access to greenspace for our communities which could impact on their ability to lead healthy lives. It would restrict the opportunities to create a productive economy as it would mainly rely on the existing land supply and exceptions to this would be identifying opportunities close to sustainable transport nodes rather than making the most of assets to grow the economy.	easy reach for the existing and future population helping to create healthier lifestyles. It would maximise the opportunities to create a productive economy as it would make the most of assets to grow the economy providing a full range of job opportunities. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine districts.	healthier lifestyles. It would maximise the opportunities to create a productive economy as it would make the most of assets to grow the economy providing a full range of job opportunities. This option would enable this, whilst at the same time identifying reasonable opportunities in the remaining districts to reduce the Green Belt loss.	in the most accessible locations with a significant amount of growth being located at the edge and beyond the urban area in areas more accessible by private car than public transport. This would result in the economic growth being less inclusive and less focused on assets.
Significant change since GMSF 2020?	No	No	No	No		No

Meet our housing need	Not capable of achieving this and would therefore be contrary to NPPF and plan objectives particularly those relating to delivering inclusive growth across the conurbation.	This option would maximise the use of the existing urban area, significantly increasing densities to maximise housing delivery. However, the option would not deliver the range of houses to meet needs.	This option would deliver high density housing development close to town centres and public transport hubs, development is likely to be high density apartments in these locations. However, unlike Option 2 there is the potential to deliver a wider range of house types, considering the greater amount of land which would be available with this option as well as the urban/rural character of existing transport hubs across the Plan area.	This option would meet GM's housing need, provide affordable homes, and provide a diverse mix of housing from the range of sustainable locations for new housing. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine districts.	This option would meet GM's housing need, provide affordable homes, and provide a diverse mix of housing from the range of sustainable locations for new housing. This option would enable this, whilst at the same time identifying reasonable opportunities in the nine PfE districts to reduce the Green Belt loss and maintain a housing flexibility buffer closer to that in the GMSF 2020. Due to a number of factors, including the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in in slight reduction in Green Belt loss compared to Option 4(a).	This option would not meet GM's housing need in numbers and would not provide the mix of housing required. Therefore it would be contrary to NPPF and plan objectives particularly those relating to delivering inclusive growth across the conurbation.
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Significant change since GMSF 2020?	No	No	No	No	No	No
Create neighbourho ods of choice	A larger proportion of the existing land supply is brownfield land and/or within the urban area, however town centre locations would not be capitalised on as places to live.	In many places development will be in the form of high density apartments. The option is likely to result in over development of sites and development which is not of a scale which is in keeping with the existing area.	In many places development will be in the form of high density apartments. The option is likely to result in over development of sites and development which is not of a scale which is in keeping with the existing area.	This option would create neighbourhoods of choice as it would deliver housing in and around the urban area across the Plan area. It would also deliver housing close to town centres and public transport hubs and on previously developed land.	This option would create neighbourhoods of choice as it would deliver housing in and around the urban area across the Plan area. It would also deliver housing close to town centres and public transport hubs and on previously developed land.	Neighbourhoods of choice would not be created because development would be located away from the Core Growth Area, some larger town centres and accessible public transport hubs to smaller town centres and local centres with limited capacity to accommodate growth.
Significant change since GMSF 2020?	No	No	No	No	No	No
Playing our part in ensuring a thriving and productive economy in all parts of	Although this option would prioritise brownfield land, it would not be capable of delivering an	The urban area would not provide the full range of employment sites needed in the nine	This option focuses on the existing land supply within the urban area being supplemented by locations close to existing transport	This option would meet the nine districts' employment land needs as it would provide a broad range of sites for	This option would meet the nine districts' employment land needs as it would provide a broad range of sites for different business needs across the	This option would not ensure a thriving and productive economy in all parts of the Plan area as previously developed land would be under

Greater Manchester	adequate distribution of employment land, limiting the ability of GM to benefit from a thriving and productive economy.	districts. There would be limited opportunities for logistics development which prefer to locate outside of the urban area, close to the strategic road network.	nodes outside the urban area. This would hinder the development high value clusters of employment activity in prime sectors. Therefore it would not provide the full range of employment sites needed in the nine districts.	different business needs across the conurbation. It will also provide locations that will be attractive to high value prime employment sectors, particularly in the city centre and along the M62, M61 and M6 Motorways. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine districts.	conurbation. It will also provide locations that will be attractive to high value prime employment sectors, particularly in the city centre and along the M62, M61 and M6 Motorways. This option would enable this, whilst at the same time identifying reasonable opportunities in the nine PfE districts to reduce the Green Belt loss and maintain the inclusive growth ambitions. Despite this, due to a number of factors, including the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in only a very slight reduction in Green Belt loss compared to Option 4(a).	-utilised and businesses would locate away from the Core Growth Area, City Centre and larger town centres. Consequently, a diverse range of employment sites and premises would not be provided which would deter some high value businesses clusters from the nine districts and GM more widely.
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Significant change since GMSF 2020?	No	No	No	No	No	No
Maximise the potential arising from our national and international assets	Relying as it does solely on the existing land supply this option would not maximise the potential arising from all the national and international assets in the Plan area. In turn it would limit the access for local people to employment in these locations.	As with the 'Business as Usual' option, the land supply in the urban area would not maximise the potential from all the national and international assets in the Plan area.	This option focuses on the existing land supply within the urban area being supplemented by locations close to existing transport nodes outside the urban area. As such it would not enable maximum potential to be made from all the assets in the Plan area.	This option takes advantage of the locations around districts' national and international assets, in the urban area, the City Centre, town centres and in Green Belt. This option would also improve sustainable transport to these locations enabling local people to access jobs in these locations. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the	This option takes advantage of the locations around districts' national and international assets, in the urban area, the City Centre, town centres and in Green Belt. This option would also improve sustainable transport to these locations enabling local people to access jobs in these locations. This option would enable this, whilst at the same time enabling reasonable opportunities in the nine PfE districts to reduce the Green Belt loss and maintain the inclusive growth ambitions. Despite this, due to a number of factors, including the need to retain enduring Green Belt boundaries and the	The national and international assets in the Core Growth Area would be under- utilised and the wealth and global attraction of GM as a whole would suffer as a result.

Significant change since GMSF 2020?	No	No	No	remaining nine districts. No	wider evidence base, this option would result in only a very slight reduction in Green Belt loss compared to Option 4(a). No	No
Reduce	Relying as it does	Similar to the	As this option	This option would	This option would	This option would
inequalities	solely on the	'Business as	focuses on existing land	strengthen the	strengthen the	not reduce
and improve prosperity	distribution of the existing land supply this option would not meet the objectively assessed needs for employment therefore it could not guarantee that all communities would have access to employment opportunities. Similarly, relying on existing distribution of land supply would limit	Usual' option, the distribution of the existing land supply would not meet the objectively assessed needs for employment therefore it could not guarantee that all communities would have access to employment	existing land supply and existing transport nodes, its contribution to redistributing growth to the north would be limited. Therefore reducing the ability to reduce inequalities and improve the prosperity of residents.	competitiveness of the north whilst balancing this with continued growth in the south of Greater Manchester. This approach will help to reduce inequalities and provide a wide range of housing and employment sites to meet the needs and aspirations for growth. However,	competitiveness of the north whilst balancing this with continued growth in the south of Greater Manchester. This approach will help to reduce inequalities and provide a wide range of housing and employment sites to meet the needs and aspirations for growth. This option would enable this, whilst at the same time enabling reasonable opportunities in the nine PfE districts to	inequalities and improve prosperity as neighbourhoods would have limited access to job opportunities due to poor public transport connections to businesses on the outskirts of the Plan area. As a result, the competitiveness of northern GM could suffer and could increase, or at least maintain, the number wards in the 10%
	the ability of the districts to	opportunities.		in removing only the Stockport	reduce the Green Belt loss and	most deprived nationally.

	strengthen the competitiveness of north GM.			allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine districts.	maintain the inclusive growth ambitions. Despite this, due to a number of factors, including the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in only a very slight reduction in Green Belt loss compared to Option 4(a).	
Significant change since GMSF 2020?	No	No	No	No	No	No
Promote the sustainable movement of people, goods and information	Given that this option focuses on the existing, urban land supply, much of it will be close to sustainable transport hubs. However, where new potential opportunities for sustainable growth have been identified, these may not be	As much of the urban land supply will be close to sustainable transport hubs, more people could potentially use public transport. However, hubs could become overwhelmed from high	This option prioritises development sites within the urban area and close to public transport nodes. Therefore it would minimise the need to travel, thus meeting the objectives that promote the	This option would create investment in the public transport network benefiting new and existing communities. Accessibility would be improved across the Plan area, including in deprived locations, which would improve access to	This option would create investment in the public transport network benefiting new and existing communities. Accessibility would be improved across the Plan area, including in deprived locations, which would improve access to jobs. Sustainable freight movements along the Manchester Ship	Under this option opportunities to enhance sustainable transport connections and to focus people's homes, work and leisure activities around them would be lost in the Core Growth Area and larger town centres. Private vehicles would be more

implementable from the existing land supply distribution, with associated impacts upon local economic productivity.	density development, putting the network under pressures with few opportunities to invest in public transport outside the urban area.	efficient movement of people.	freight movements along the Manchester Ship Canal would be created and opportunities for affordable and high quality digital infrastructure would be provided. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine	Canal would be created and opportunities for affordable and high quality digital infrastructure would be provided. This approach will help to reduce inequalities and provide a wide range of housing and employment sites to meet the needs and aspirations for growth. This option would enable this, whilst at the same time enabling reasonable opportunities in the nine PfE districts to reduce the Green Belt loss and maintain the	popular due to health fears over use of public transport and because work and leisure destinations, dispersed through and on the edge of the urban area, would be less connected by sustainable transport. A more dispersed settlement pattern would not create the development focus that would be needed to gain national and regional transport investment. New digital
			would be provided. However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the	meet the needs and aspirations for growth. This option would enable this, whilst at the same time enabling reasonable opportunities in the nine PfE districts to reduce the Green	sustainable transport. A more dispersed settlement pattern would not create the development focus that would be needed to gain national and regional transport investment. New digital infrastructure on the outskirts of the Plan area could be more
				the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in only a very	expensive to provide than upgrading to existing infrastructure in the urban area and Core Growth Area.

Significant change since GMSF 2020?	No Given that this	No The over-	No This option could	No As a large	slight reduction in Green Belt loss compared to Option 4(a). No	No There could be some
Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city- region	option focuses on the existing, urban land supply, it will help to promote sustainable patterns of development however there will be reduced opportunity to encourage carbon neutrality in new development as a significant part of the existing land supply already has agreed planning permission.	capacity of the sustainable transport network in the urban area, might increase car travel as an alternative which could increase air pollution. However, there might be opportunities to promote carbon neutral development with higher density development.	lead to an over- capacity of the sustainable transport network in the urban area, which in turn might increase car travel as an alternative making it more difficult to achieve a carbon neutral city-region.	As a large proportion of the land supply focuses on the existing, urban land supply, this option will help to promote sustainable patterns of development. Also, under this option there is a greater opportunity to promote low carbon and sustainable development through the design and location of housing and employment developments.	As a large proportion of the land supply focuses on the existing, urban land supply, this option will help to promote sustainable patterns of development. Also, under this option there is a greater opportunity to promote low carbon and sustainable development through the design and location of housing and employment developments. This approach will help to reduce inequalities and provide a wide range of housing and employment sites to meet the needs and aspirations for growth. This option	niere could be some positive impacts on this objective from more home working and from local trips via active modes of transport e.g. cycling and walking. However, a more suburbanised settlement pattern on the edges of the urban area is likely to increase car dependency for longer distance trips, as people need to travel further to reach jobs, leisure and recreation destinations and which are also more likely to be in

				However, in removing only the Stockport allocations, this option could make no attempt to reduce the Green Belt loss in the remaining nine districts.	would enable this, whilst at the same time enabling reasonable opportunities in the nine PfE districts to reduce the Green Belt loss and maintain the inclusive growth ambitions. Despite this, due to a number of factors, including the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in only a very slight reduction in Green Belt loss compared to Option 4(a).	locations that are inaccessible by sustainable transport options, or at least served by less reliable services.
Significant change since GMSF 2020?	No	No	No	No	No	No
Improve the	As this option	Urban green	With the majority	The opportunity to	The opportunity to	This option would
quality of our	focuses on the	spaces, which	of development	create larger scale	create larger scale communities with	have some positive
natural	existing land	helps to adapt	being focused	communities with	this option would	and negative
environment	supply distribution	to climate	within the urban	this option would	increase the	impacts on this
and access	there could be	change, could	area, there is likely	increase the	opportunities to	objective. More
to green	fewer opportunities	be lost from	to be increased	opportunities to	provide a range of	development on the
spaces	to create new	pressure to	pressure to build	provide a range of	accessible natural	outskirts of the Plan

green spaces and	build high	on green spaces	accessible natural	and formal	area would put
potentially more	density	which could limit	and formal	greenspace. Also, as	residents closer to
pressure on the	development.	access to green	greenspace. Also,	sustainable transport	areas of greenspace,
existing		spaces and have a	as sustainable	connections would	however there could
environment and		negative	transport	be foci for new	be greater pressure
green spaces.		environmental	connections would	housing	to develop and
groon op accor		impact.	be foci for new	development and that sustainable	consequently
		impuot.	housing	transport	threaten special
			development and	connections would	landscapes and
			that sustainable	be improved, under	areas of green
			transport	this option people	infrastructure and
			connections would	living in the urban	biodiversity. Less
			be improved,	area would have	development in the
			under this option	more opportunities to	more dense urban
			people living in the	access greenspace on the edge and	neighbourhoods may
			urban area would	beyond the	protect urban
			have more	conurbation. This	
				approach will help to	greenspace.
			opportunities to	reduce inequalities	
			access	and provide a wide	
			greenspace on the	range of housing and	
			edge and beyond	employment sites to meet the needs and	
			the conurbation.	aspirations for	
			However, in	growth. This option	
			removing only the	would enable this,	
			Stockport	whilst at the same	
			allocations, this	time enabling	
			option could make	reasonable	
			no attempt to	opportunities in the	
			reduce the Green	nine PfE districts to reduce the Green	
			Belt loss in the		

Significant change since	No	No	No	remaining nine districts with consequential impacts on green spaces in these locations	Belt loss and maintain the inclusive growth ambitions. Despite this, due to a number of factors, including the need to retain enduring Green Belt boundaries and the wider evidence base, this option would result in only a very slight reduction in Green Belt loss compared to Option 4(a).	No
GMSF 2020? Ensure access to physical and social infrastructur e	As this option is focused on the existing land supply distribution it could result in a greater reliance on existing levels of physical and social infrastructure and may provide fewer opportunities to improve their	Similarly to the 'Business as Usual' option there may be few opportunities to create new and improve physical and social infrastructure in the urban area. High density	With the majority of development being focused within the urban area, there may be limited opportunities to create new and improved physical and social infrastructure in the urban area. High density development could also overwhelm	This option would provide more opportunities and flexibility to upgrade existing and create new social and physical infrastructure, targeting locations where it is needed the most.	This option would provide more opportunities and flexibility to upgrade existing and create new social and physical infrastructure, targeting locations where it is needed the most.	As this option may result in more homeworking and less focus on the Core Growth Area it may result in increased pressure on existing local services and may result in the need to travel further to specialised facilities further afield which

	quality and distribution.	development could also overwhelm the capacity of infrastructure.	the capacity of existing infrastructure.			could be harder to access if not connected to sustainable transport options. There would be less opportunities to create new physical and social infrastructure in the smaller town centres due to their limited size and limited investment opportunities.
Significant change since GMSF 2020?	No	No	No	No	No	No
Promote the health and wellbeing of communities	This option would rely on the existing land supply distribution and therefore could limit the opportunities to identify new opportunities to address current inequalities in terms of health and	Loss of urban green space, high density development and limited opportunities to invest in social infrastructure from capacity issues are likely to have a negative impact on the health	Increased pressure on urban green space, high density development and limited opportunities to invest in social infrastructure from capacity issues are likely to have a negative impact on the health and wellbeing of the districts' residents.	This option would provide more opportunities identify new opportunities to address current inequalities in terms of health and wellbeing of the districts' residents.	This option would provide more opportunities identify new opportunities to address current inequalities in terms of health and wellbeing of the districts' residents.	There might be some positives from residents accessing greenspace in the urban area and on the edge of Plan area and an increase in the use of active travel modes, but overall, the option's negative impact against the PfE Objectives described

	wellbeing of the districts' residents.	and wellbeing of the districts' residents.				above would not create healthy and happy residents.
Significant change since GMSF 2020?	No	No	No	No	No	No

13.2 Based on the assessment in the table above, each of the spatial options have positive impacts to a greater or lesser extent in terms of delivering the overall PfE Vision and Strategic Objectives. However, it is considered that options 4(a) and 4(b) perform well against all objectives. Out of these two, it is considered that option 4(b) allows the most scope to reduce the Green Belt loss, albeit only by a limited amount, particularly given the need to propose enduring Green Belt boundaries and the wider evidence base. Therefore, option 4(b) has been chosen as the preferred spatial option for the PfE 2021. However, as part of the appraisal of the GMSF 2019, a number of proposed mitigations were identified for the Plan, should this Spatial Option be chosen as the preferred option. These mitigations were identified to ensure that the policy framework contained within the Plan reduced the potential for negative impacts from future development, including the allocations and maximised the social, environmental and economic opportunities to bring about sustainable development. Appendix 1 of this paper sets out the difference this appraisal has had on the Plan. This assessment was carried out in relation to the GMSF 2020, however given that the PfE 2021 has been prepared on the basis that is substantially the same effect as the GMSF 2020, it is considered that the assessment remains valid in relation to the PfE 2021.

## 14.0 Integrated Assessment of 2021 Growth and Spatial Options

- 14.1 In addition to the above, the reasonable alternatives for the level of growth and its spatial distribution (the Growth and Spatial Options) have been assessed against the Integrated Assessment appraisal framework to determine their impact on social, environmental and economic factors as part of the SA/SEA. A full assessment was undertaken by Arup as part of the Integrated Assessment process to inform the GMSF 2020. For the growth options, Growth Option 2 was found to be the most sustainable as it provided sufficient land to meet local needs, thus affording the flexibility to ensure housing and employment land needs would be met sustainably across GM. Growth Option 1 was found to have a negative impact on sustainable development as the local housing need (LHN) and employment land need would not be met and Growth Option 3 was found to have negative impacts on connectivity and climate change effects.
- 14.2 In terms of the spatial options, Option 4(b), , performed the best as it was found to deliver a full range of housing in sustainable locations. Opportunities would generally be maximised, including access to urban green space and employment opportunities. Unlike Option 4(a), it also enabled the nine districts to consider reasonable opportunities to reduce the Green Belt loss, where possible. Spatial Option 1 did not meet the LHN or employment land needs and scored negatively. Spatial Options 2 and 3, although would meet the LHN would put adverse pressure on the urban area and consequently they scored negatively. Option 5 also scored negatively as it would have a detrimental effect on accessibility and inclusivity, and would also significantly increase private car journeys.
- 14.3 Although, the IA prepared to support the GMSF 2020 remains valid in the context of the PfE 2021, consideration has been given, by Arup as to whether any of the changes between the

GMSF 2020 and PfE 2021 have resulted in a changed impact on the previous assessment of the Growth and Spatial Options for the GMSF 2020. The Addendum report produced as part of the SA/SEA concludes that the changes have not resulted in a change to the previous conclusions. Therefore Option 2 has been chosen as the preferred Growth Option and Option 4(b) the preferred Spatial Option for the PfE 2021.

## 15.0 Conclusion

- 15.1 The assessment detailed in this paper sets out the evolution of both the Growth and Spatial Options for the GMSF and its evolution into the PfE 2021. It sets out the justification for selecting the preferred options for the PfE 2021. The Growth and Spatial Options have been assessed against the overall Vision for Greater Manchester (as set out in the PfE 2021) and the Strategic Objectives of the PfE 2021.
- 15.2 As a result of the assessments outlined in this Paper, the Growth Option of planning for the objectively assessed needs of the nine districts and the hybrid spatial option of the GMSF 2019 are considered to represent an appropriate strategy for the nine districts to achieve their joint vision and objectives. In choosing these Growth and Spatial Options, it has been necessary to be mindful of the outcomes of the appraisals of these options against the Integrated Assessment framework and therefore an appropriate policy framework has been included within the PfE 2021 to ensure the potential for negative impacts from future development is reduced and/or mitigated against and the opportunities for social, environmental and economic benefit are maximised thus bringing about sustainable development through the PfE Plan. Separately the PfE Plan has been through an iterative process of Integrated Assessment framework. As such the process of identifying preferred Growth and Spatial Options is clearly aligned with the Integrated Assessment.

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## Appendix 1

# Assessment of how the recommended mitigation from the Integrated Assessment of the GMSF 2019 Hybrid Spatial Option was incorporated into the GMSF 2020

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
1	Provide a sustainable supply of housing land including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	Ensure an appropriate quantity of housing land to meet the objectively assessed need for market and affordable housing?	This Option is designed to meet the LHN across GM and has the potential to deliver a mix of types, tenures and sizes of dwellings since it includes a range of locations for development. It is likely that new housing will be located close to and/or have existing transport links to existing employment opportunities, town centres and green spaces in around the urban area. However, as this option includes employment sites adjacent to the motorway network, which some employment sector such as logistics and advanced manufacturing prefer, residents may need to travel further for some employment opportunities. However the provision of new public transport should address this. The spatial location of housing is unlikely to have significant impacts on energy efficient and	Could have cumulative socio- economic and environmental effects with other local development schemes.	None as this option would meet LHN.	N/A

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
			resilience of housing stock, although the GMSF should seek to improve energy efficient in all housing.			
1	Provide a sustainable supply of housing land including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	Ensure an appropriate mix of types, tenures and sizes of properties in relation to the respective levels of local demand?	This Option is designed to meet the LHN across GM and has the potential to deliver a mix of types, tenures and sizes of dwellings since it includes a range of locations for development. It is likely that new housing will be located close to and/or have existing transport links to existing employment opportunities, town centres and green spaces in around the urban area. However, as this option includes employment sites adjacent to the motorway network, which some employment sector such as logistics and advanced manufacturing prefer, residents may need to travel further for some employment opportunities. However the provision of new public transport should address this.	Could have cumulative socio- economic and environmental effects with other local development schemes	Require a policy on the mix of types, tenures and sizes of housing.	Covered Policy GM-H 3: Type Size and Design of New Development
1	Provide a sustainable supply of housing land	Ensure housing land is well- connected	This Option is designed to meet the LHN across GM and has the potential to deliver a mix of types, tenures and sizes of dwellings	Could have cumulative socio- economic and environmental effects with other local development schemes.	To ensure land is well connected Policies must ensure allocations are accessible by public transport	Covered by clause 13 of Policy GM-E 1 Sustainable Places

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	with employment land, centres and green space or co- located where appropriate?	since it includes a range of locations for development. It is likely that new housing will be located close to and/or have existing transport links to existing employment opportunities, town centres and green spaces in around the urban area. However, as this option includes employment sites adjacent to the motorway network, which some employment sector such as logistics and advanced manufacturing prefer, residents may need to travel further for some employment opportunities. However the provision of new public transport should address this. The spatial location of housing is unlikely to have significant impacts on energy efficient and resilience of housing stock, although the GMSF should seek to improve energy efficient in all housing.			
1	Provide a sustainable supply of housing land including for	Support improvement s in the energy efficiency	This Option is designed to meet the LHN across GM and has the potential to deliver a mix of types, tenures and sizes of dwellings	Could have cumulative socio- economic and environmental effects with other local development schemes.	GMSF should ensure coverage of this objective in policy. Such policy might require Energy Assessments	Covered by Policy GM-S 2 Carbon and Energy

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	and resilience of the housing stock?	since it includes a range of locations for development. It is likely that new housing will be located close to and/or have existing transport links to existing employment opportunities, town centres and green spaces in around the urban area. However, as this option includes employment sites adjacent to the motorway network, which some employment sector such as logistics and advanced manufacturing prefer, residents may need to travel further for some employment opportunities. However the provision of new public transport should address this. The spatial location of housing is unlikely to have significant impacts on energy efficient and resilience of housing stock, although the GMSF should seek to improve energy efficient in all housing.		for new developments of a certain size.	
2	Provide a sustainable supply of employment land to	Meet current and future demand for employment	This option will meet current and future demand for employment land by proposing a range of locations to meet the needs of different business sectors.	Could have cumulative socio- economic and environmental effects with other local development schemes.	None required as need will be met.	N/A

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	ensure sustainable economic growth and job creation	land across GM?	The spatial location of development in this option is unlikely to have an impact of the provision of education and training of workforce. This Option would deliver employment opportunities in a range of locations to meet needs. Employment land in the urban area, close to town centres and sustainable transport hubs could be served well by existing transport infrastructure. Employment land further afield adjacent to motorway junctions would need to ensure that it is accessible to workers, including by public transport.			
2	Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation	Support education and training to provide a suitable labour force for future growth?	This option will meet current and future demand for employment land by proposing a range of locations to meet the needs of different business sectors. The spatial location of development in this option is unlikely to have an impact of the provision of education and training of workforce. This Option would deliver employment opportunities in a range of locations to meet needs.	Could have cumulative socio- economic and environmental effects with other local development schemes.	The GMSF should link to other CA plans and programmes about improving skills and training for GM residents.	Covered by Policy GM-E 5 Education, Skills and Knowledge

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
			Employment land in the urban area, close to town centres and sustainable transport hubs could be served well by existing transport infrastructure. Employment land further afield adjacent to motorway junctions would need to ensure that it is accessible to workers, including by public transport. This option will meet current and	Could have cumulative socio-	The GMSF should encourage	Covered by Policy GM-N1
2	Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation	Provide sufficient employment land in locations that are well- connected and well- served by infrastructure ?	future demand for employment land by proposing a range of locations to meet the needs of different business sectors. The spatial location of development in this option is unlikely to have an impact of the provision of education and training of workforce. This Option would deliver employment opportunities in a range of locations to meet needs. Employment land in the urban area, close to town centres and sustainable transport hubs could be served well by existing transport infrastructure. Employment land further afield adjacent to motorway junctions would need to ensure that it is	economic and environmental effects with other local development schemes.	a strategic approach to transport connectivity and ensure that employment locations take account of current and future infrastructure. GMSF policies should require delivery of the necessary transport infrastructure.	Covered by Policy GM-N7 Our Integrated Network Covered by Policy GM-N7 Transport requirements of new development

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
3	Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development	Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development ?	accessible to workers, including by public transport. Under this Option new housing and businesses would be situated close to transport connections, in and adjacent to the urban areas and in further afield where they boost northern competitiveness and capitalise on national and global assets. The GMSF would need to ensure that development allocations beyond the urban area are supported by a sustainable transport network, but it also presents the opportunity to create new transport infrastructure. New housing and businesses would be situated close to existing utility and digital infrastructure. There is a need to ensure that it can accommodate the demands of the scale of new development planned through the GMSF.	Could have cumulative socio- economic and environmental effects with other local development schemes. Air quality and noise issues	Ensure long term investment in the transport network and promote through policy sustainable transport options. Policies need to require the necessary transport infrastructure to be delivered in discussion with TFGM.	Covered by Policy GM-N1 Our Integrated Network Covered by Policy GM-N7 Transport requirements of new development
3	Ensure that there is sufficient coverage and capacity	Improve transport connectivity?	Under this Option new housing and businesses would be situated close to transport connections, in and adjacent to the urban areas and in further afield where they	Could have cumulative socio- economic and environmental effects with other local development schemes.	Ensure long term investment in the transport network and promote through policy sustainable transport options.	Covered by Policy GM-N1 Our Integrated Network

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	of transport and utilities to support growth and development		boost northern competitiveness and capitalise on national and global assets. The GMSF would need to ensure that development allocations beyond the urban area are supported by a sustainable transport network, but it also presents the opportunity to create new transport infrastructure. New housing and businesses would be situated close to existing utility and digital infrastructure. There is a need to ensure that it can accommodate the demands of the scale of new development planned through the GMSF.	Air quality and noise issues		
3	Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development	Ensure that utilities / digital infrastructure can support and enable the anticipated scale and spatial distribution of	Under this Option new housing and businesses would be situated close to transport connections, in and adjacent to the urban areas and in further afield where they boost northern competitiveness and capitalise on national and global assets. The GMSF would need to ensure that development allocations beyond the urban area are	Could have cumulative socio- economic and environmental effects with other local development schemes. Air quality and noise issues	Ensure long term investment in the utility and digital network by working with providers.	Covered by Policy GM-N2 Digital connectivity Covered by Policy GM-D 1 Infrastructure Implementation

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
		development ?	supported by a sustainable transport network, but it also presents the opportunity to create new transport infrastructure. New housing and businesses would be situated close to existing utility and digital infrastructure. There is a need to ensure that it can accommodate the demands of the scale of new development planned through the GMSF.			
4	Reduce levels of deprivation and disparity	Reduce the proportion of people living in deprivation?	This Option would tackle deprivation in variety of locations in GM by providing new homes and jobs in the urban area, town centres, close to sustainable transport hubs, deprived areas across GM and specifically tackle deprivation in the north of GM. It is assumed that there will some increase in supply of affordable housing which will result in improvements against barriers to Housing and Services deprivation domain. There will be an increase against the Living Environment (indoors subset) deprivation domain as the new housing will	Link to other initiatives or investments (e.g. apprenticeships, health initiatives, education and/or skills programmes)	None identified as this option is designed to reduce deprivation.	N/A

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified result in an improvement to the quality of the housing stock.	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
4	Reduce levels of deprivation and disparity	Support reductions in poverty (including child and fuel poverty), deprivation and disparity across the domains of the Indices of Multiple Deprivation?	This Option would tackle deprivation in variety of locations in GM by providing new homes and jobs in the urban area, town centres, close to sustainable transport hubs, deprived areas across GM and specifically tackle deprivation in the north of GM. It is assumed that there will some increase in supply of affordable housing which will result in improvements against barriers to Housing and Services deprivation domain. There will be an increase against the Living Environment (indoors subset) deprivation domain as the new housing will result in an improvement to the quality of the housing stock.	Link to other initiatives or investments (e.g. apprenticeships, health initiatives, education and/or skills programmes)	As above.	N/A
5	Promote equality of opportunity and the elimination of	Foster good relations between different people?	This spatial option is unlikely to have a significant impact on or the impacts are unknown on this objective. However, the emphasis on building around sustainable transport locations under is option is likely to have a positive impact	Potential link to other initiatives which seek to integrate communities.	Physically link new communities to existing ones through footpaths, cycle routes and/or roads to help integration.	Covered by Policy GM-E 1 Sustainable Places

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	discriminatio n		connecting people with facilities and infrastructure.		Require new development to ensure that new facilities are accessible by existing communities as well as new/future communities.	
5	Promote equality of opportunity and the elimination of discriminatio n	Ensure equality of opportunity and equal access to facilities / infrastructure for all?	This spatial option is unlikely to have a significant impact on or the impacts are unknown on this objective. However, the emphasis on building around sustainable transport locations under is option is likely to have a positive impact connecting people with facilities and infrastructure.	Potential link to other initiatives which seek to integrate communities.	The GMSF should recognise the importance of social infrastructure (SI) and other community facilities and encourage detailed studies of provision and capacity. The GMSF should state in policy that development which provides new social infrastructure (SI) will be supported, and development which results in loss of SI will not be supported.	Covered by Policy GM-D 1 Infrastructure Implementation GMSF does not have a policy that specifically states that development which provides new social infrastructure will be supported, and development which results in loss of will not be supported. But Policy GM-D 2 Developer Contributions is about ensuring development makes provision for infrastructure, including social infrastructure.
5	Promote equality of opportunity and the elimination of discriminatio n	Ensure no discriminatio n based on 'protected characteristic s', as defined in the Equality Act 2010?	This spatial option is unlikely to have a significant impact on or the impacts are unknown on this objective. However, the emphasis on building around sustainable transport locations under is option is likely to have a positive impact connecting people with facilities and infrastructure.	Potential link to other initiatives which seek to integrate communities.	No direct discrimination has been identified. However, accessibility should be considered when new SI is delivered (eg for disabled and elderly people).	Covered by Policy GM-E 1 Sustainable Places
5	Promote equality of opportunity and the	Ensure that the needs of different areas,	This spatial option is unlikely to have a significant impact on or the impacts are unknown on this objective. However, the emphasis	Potential link to other initiatives which seek to integrate communities.	Physically link new communities to existing ones through footpaths, cycle	Covered by Policy GM-E 1 Sustainable Places

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	elimination of discriminatio n	(namely urban, suburban, urban fringe and rural) are equally addressed?	on building around sustainable transport locations under is option is likely to have a positive impact connecting people with facilities and infrastructure.		routes and/or roads to help integration. Require new development to ensure that new facilities are accessible by existing communities as well as new/future communities.	
6	Support improved health and wellbeing of the population and reduce health inequalities	Support healthier lifestyles and support improvement s in determinants of health?	Under this Option health facilities would be located in the most sustainable locations within the urban area and new allocations in Green belt would provide opportunities to create new health facilities and new development that promoted heathy lifestyles e.g. green infrastructure and cycling routes. An increase in housing under this option has the potential to reduce the number of people living in poor housing conditions which can have a positive impact on health. Under this option existing greenspaces in the urban area could be capitalised on, new greenspaces created in developments in Green Belt and sustainable transport links created	Improved health and reduced health inequalities through positive planning and the promotion of green spaces.	The GMSF should be designed to ensure strategic/large development proposals include some greenspace for use by new and existing communities.	Covered by Policy GM-E 1 Sustainable Places, Policy GM-D 1 Infrastructure Implementation, Policy GM-D 2 Developer Contributions, Policy GM-G 6 Urban Green Space

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
			to connect greenspaces further afield.			
6	Support improved health and wellbeing of the population and reduce health inequalities	Reduce health inequalities within GM and with the rest of England?	Under this Option health facilities would be located in the most sustainable locations within the urban area and new allocations in Green belt would provide opportunities to create new health facilities and new development that promoted heathy lifestyles e.g. green infrastructure and cycling routes. An increase in housing under this option has the potential to reduce the number of people living in poor housing conditions which can have a positive impact on health. Under this option existing greenspaces in the urban area could be capitalised on, new greenspaces created in developments in Green Belt and sustainable transport links created to connect greenspaces further afield.	Improved health and reduced health inequalities through positive planning and the promotion of green spaces.	As above.	As above.

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
6	Support improved health and wellbeing of the population and reduce health inequalities	Promote access to green space?	Under this Option health facilities would be located in the most sustainable locations within the urban area and new allocations in Green belt would provide opportunities to create new health facilities and new development that promoted heathy lifestyles e.g. green infrastructure and cycling routes. An increase in housing under this option has the potential to reduce the number of people living in poor housing conditions which can have a positive impact on health. Under this option existing greenspaces in the urban area could be capitalised on, new greenspaces created in developments in Green Belt and sustainable transport links created to connect greenspaces further afield.	Improved health and reduced health inequalities through positive planning and the promotion of green spaces.	Policy should be designed to ensure development proposals include some green space for use by new and existing communities. If green space in the area is adequate then new development should ensure links to existing sites are included in design	Covered by Policy GM-E 1 Sustainable Places and Policy GM-G 6 Urban Green Space
7	Ensure access to and provision of appropriate social	Ensure people are adequately served by key healthcare	Local authorities will receive contributions from development of sites which my help to increase investment in education and other social infrastructure.	Increased access coupled with population growth may present capacity issues.	Ensure existing facilities can cope with demand with the increased demand or plans are in place to increase capacity or develop new facilities in new locations.	Covered by Policy GM-E 6 Health

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	infrastructur e	facilities, regardless of socio- economic status?	Under this option, which seeks to redistribute development around GM, there might be positive effects in areas which have not experienced much investment or development, including the provision of social infrastructure. There is a potential risk, that over time, existing facilities could be put under pressure from the level of demand in the urban area, but there might be opportunities to create new facilities in the Green Belt under this option.			
7	Ensure access to and provision of appropriate social infrastructur e	Ensure sufficient access to educational facilities for all children?	Local authorities will receive contributions from development of sites which my help to increase investment in education and other social infrastructure. Under this option, which seeks to redistribute development around GM, there might be positive effects in areas which have not experienced much investment or development, including the provision of social infrastructure.	Increased access coupled with population growth may present capacity issues.	As above.	Covered by Policy GM-E 5 Education, Skills and Knowledge

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			There is a potential risk, that over time, existing facilities could be put under pressure from the level of demand in the urban area, but there might be opportunities to create new facilities in the Green Belt under this option.			
7	Ensure access to and provision of appropriate social infrastructur e	Promote access to and provision of appropriate community social infrastructure including playgrounds and sports facilities?	Local authorities will receive contributions from development of sites which my help to increase investment in education and other social infrastructure. Under this option, which seeks to redistribute development around GM, there might be positive effects in areas which have not experienced much investment or development, including the provision of social infrastructure. There is a potential risk, that over time, existing facilities could be put under pressure from the level of demand in the urban area, but there might be opportunities to create new facilities in the Green Belt under this option.	Increased access coupled with population growth may present capacity issues.	As above.	Covered by Policy GM-E 7 Sport and Recreation, Policy GM-E 6 Health and Policy GM-E 5 Education, Skills and Knowledge

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8	Support improved educational attainment and skill levels for all	Improve education levels of children in the area, regardless of their background?	Local authorities will receive contributions from development of sites which my help to increase investment in education and training. Under this option, which seeks to redistribute development around GM, there might be positive effects in areas which have not experienced much investment or development, including the provision of education. There is a potential risk, that over time, existing facilities could be put under pressure from the level of demand in the urban area, but there might be opportunities to create new facilities in the Green Belt under this option.	Potential capacity issues if facilities are not developed at same rate as residential developments.	Ensure existing facilities can cope with demand with the increased demand or plans are in place to increase capacity or develop new facilities in new locations.	Covered by Policy GM-E 5 Education, Skills and Knowledge
8	Support improved educational attainment and skill levels for all	Improve educational and skill levels of the population of working age?	Local authorities will receive contributions from development of sites which my help to increase investment in education and training.	Potential capacity issues if facilities are not developed at same rate as residential developments.	The GMSF should encourage the linking together of new development and training (e.g. requiring apprenticeships for strategic development, larger scale developments and/or those	The Reasoned Justification to Policy GM-E 5 Education, Skills and Knowledge discusses the importance of upskilling Greater Manchester's residents so that the can

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			Under this option, which seeks to redistribute development around GM, there might be positive effects in areas which have not experienced much investment or development, including the provision of education. There is a potential risk, that over time, existing facilities could be put under pressure from the level of demand in the urban area, but there might be opportunities to create new facilities in the Green Belt under this option.		which have some public funding). Development linked to major infrastructure investment should seek to up-skill the local workforce to ensure the right mix of skills is available into the future.	benefit from the economic growth planned for GM, but not as specific of relating development sites to local workforce training, which might be more appropriate to have in Local Plans.
9	Promote sustainable modes of transport	Reduce the need to travel and promote efficient patterns of movement?	This option includes taking advantage of the most sustainable locations in GM. There is a need to ensure that new allocations in Green Belt accessible by public transport and designed to promote active and healthy lifestyles. In the long term there is a need to ensure that sustainable transport provision can keep pace with the level of demand. This option includes large allocations in the north and south GM which are likely to stimulate more trips,	Changes in travel patterns as people begin to take advantage of public transport as their main form of transport	Ensure that in the long term sustainable transport provision can keep pace with the level of demand and that larger new developments on the edge of the urban area are designed to be well connected.	Covered by Policy GM-N1 Our Integrated Network

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			some of which will include private car trips. Those in / close to urban sites will also stimulate car trips, but in lower proportions, as they are more likely to be located to employment land or a transport hub. The allocations are large enough that development would require investment in new public transport provision. This presents the opportunity to promote efficient patterns of movement through the provision of viable public transport, cycle and walking routes in a way which would not be possible with smaller developments. Although, there is no guarantee that public transport will be used over private vehicle. The availability of potential large sites in the Green Belt could allow the co-location of employment and housing			
9	Promote sustainable modes of transport	Promote a safe and sustainable public transport network that reduces reliance on	This option includes taking advantage of the most sustainable locations in GM. There is a need to ensure that new allocations in Green Belt accessible by public transport and	Changes in travel patterns as people begin to take advantage of public transport as their main form of transport	As above.	Covered by Policy GM-N1 Our Integrated Network

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		private motor vehicles?	designed to promote active and healthy lifestyles. In the long term there is a need to ensure that sustainable transport			
			provision can keep pace with the level of demand. This option includes large allocations in the north and south GM which are likely to stimulate more trips,			
			some of which will include private car trips. Those in / close to urban sites will also stimulate car trips, but in lower proportions, as they are more likely to be located to			
			employment land or a transport hub. The allocations are large enough that development would require investment in new public transport provision. This presents			
			the opportunity to promote efficient patterns of movement through the provision of viable public transport, cycle and walking routes in a way which			
			would not be possible with smaller developments. Although, there is no guarantee that public transport will be used over private vehicle.			
			The availability of potential large sites in the Green Belt could allow			

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			the co-location of employment and housing			
9	Promote sustainable modes of transport	Support the use of sustainable and active modes of transport?	This option includes taking advantage of the most sustainable locations in GM. There is a need to ensure that new allocations in Green Belt accessible by public transport and designed to promote active and healthy lifestyles. In the long term there is a need to ensure that sustainable transport provision can keep pace with the level of demand. This option includes large allocations in the north and south GM which are likely to stimulate more trips, some of which will include private car trips. Those in / close to urban sites will also stimulate car trips, but in lower proportions, as they are more likely to be located to employment land or a transport hub. The allocations are large enough that development would require investment in new public transport provision. This presents the opportunity to promote efficient patterns of movement through the provision of viable	Changes in travel patterns as people begin to take advantage of public transport as their main form of transport	As above.	Covered by Policy GM-N1 Our Integrated Network

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			public transport, cycle and walking routes in a way which would not be possible with smaller developments. Although, there is no guarantee that public transport will be used over private vehicle. The availability of potential large sites in the Green Belt could allow the co-location of employment and housing			
10	Improve air quality	Improve air quality within Greater Manchester, particularly in the 10 Air Quality Management Areas (AQMAs)?	This option seeks to reduce the need to travel and to maximise sustainable patterns of transport as alternatives to using vehicles. Less use of petrol and diesel vehicles will improve air quality. It is likely to be a gradual change as people learn to adapt to new ways of travelling. However it also includes Green belt release on the edge of the urban area which if not designed to promote the use of sustainable transport, could increase car journeys.	Increased trips by private motor vehicle will worsen the air quality over time if sustainable modes are not utilised.	Particular attention would have to be paid to the strategic provision of public transport infrastructure for the allocations to reduce reliance on the private car.	Covered by GM-N7 Transport requirements of new development
11	Conserve and enhance biodiversity, green infrastructur e and	Provide opportunities to enhance new and existing wildlife and	It is assumed all development will be brought forward in line with best practice, the requirements of the planning system and legislation that covers the protection of designated sites/habitats and species.	Wildlife, geological and other sites that have a landscape value or value to different habitats deteriorate if they are not enhanced and managed.	The GMSF should promote strategic approach to ecological sites and networks and consider a GM-wide plan of conservation and enhancement. Opportunities for green space creation	Covered by Policy GM-G 2 Green Infrastructure Network (Nature Recovery Network), Policy GM-G 9 Standards for a Greener Greater Manchester and Policy GM-G 6 Urban Green Space

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	geodiversity assets	geological sites?	There is potential that non- designated sites and wildlife corridors may be affected by development. Larger sites on the edge of the urban area on greenfield land might pose more of a potential risk to biodiversity than sites in the urban area. However they would also have the potential to create new sites of ecological interest and the development of multi-functional sites co-located next to housing.		should be explored. As should opportunities for linking existing spaces and ecological networks. Access to any new green space should be open, thus increasing provision in local areas, benefiting existing and future communities.	
11	Conserve and enhance biodiversity, green infrastructur e and geodiversity assets	Avoid damage to or destruction of designated wildlife sites, habitats and species and protected and unique geological features?	It is assumed all development will be brought forward in line with best practice, the requirements of the planning system and legislation that covers the protection of designated sites/habitats and species. There is potential that non- designated sites and wildlife corridors may be affected by development. Larger sites on the edge of the urban area on greenfield land might pose more of a potential risk to biodiversity than sites in	Wildlife, geological and other sites that have a landscape value or value to different habitats deteriorate if they are not enhanced and managed.	Policy should stress the value of multifunctional green infrastructure, recognising the economic and social value sites can deliver. Larger, strategic sites should contribute to creation of new multifunctional green infrastructure within the sites themselves, but also attempt to connect to existing sites through green and blue corridors. New sites should be accessible to existing communities as well as proposed future residents.	Covered by Policy GM-G 2 Green Infrastructure Network (Nature Recovery Network), Policy GM-D 2 Developer Contributions and Policy GM- E 1 Sustainable Places

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11	Conserve and enhance biodiversity, green infrastructur e and geodiversity assets	Support and enhance existing multifunction al green infrastructure and / or contribute towards the creation of new multifunction al green infrastructure ?	have been identifiedthe urban area. However theywould also have the potential tocreate new sites of ecologicalinterest and the development ofmulti-functional sites co-locatednext to housing.It is assumed all development willbe brought forward in line withbest practice, the requirements ofthe planning system andlegislation that covers theprotection of designatedsites/habitats and species.There is potential that non-designated sites and wildlifecorridors may be affected bydevelopment.Larger sites on the edge of theurban area on greenfield landmight pose more of a potentialrisk to biodiversity than sites inthe urban area. However theywould also have the potential to	Wildlife, geological and other sites that have a landscape value or value to different habitats deteriorate if they are not enhanced and managed.	As above.	Covered by Policy GM-G 2 Green Infrastructure Network (Nature Recovery Network), Policy GM-D 2 Developer Contributions and Policy GM- E 1 Sustainable Places
			create new sites of ecological interest and the development of multi-functional sites co-located next to housing.			

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11	Conserve and enhance biodiversity, green infrastructur e and geodiversity assets	Ensure access to green infrastructure providing opportunities for recreation, amenity and tranquillity?	It is assumed all development will be brought forward in line with best practice, the requirements of the planning system and legislation that covers the protection of designated sites/habitats and species. There is potential that non- designated sites and wildlife corridors may be affected by development. Larger sites on the edge of the urban area on greenfield land might pose more of a potential risk to biodiversity than sites in the urban area. However they would also have the potential to create new sites of ecological interest and the development of multi-functional sites co-located next to housing.	Wildlife, geological and other sites that have a landscape value or value to different habitats deteriorate if they are not enhanced and managed.	As above.	Covered by Policy GM-G 2 Green Infrastructure Network (Nature Recovery Network), Policy GM-D 2 Developer Contributions and Policy GM- E 1 Sustainable Places
12	Ensure communities , development s and infrastructur e are resilient to the effects of expected	Ensure that communities, existing and new development s and infrastructure systems are resilient to the predicted	The main climate change risks to GM are flooding and the urban heat island effect. Under this option there would be some high density development that could contribute to the urban heat island and put pressure building on cooling urban green spaces. There could also be pressure on drainage infrastructure in the	Potential cumulative effects of climate change if unmitigated could be impacts on human health and biodiversity as a result of the urban heat island effect and damage to drainage infrastructure, human health and wellbeing and housing provision of flooding.	GMSF policies should ensure new development and infrastructure are designed to mitigate the impacts of climate change.	Covered Policy GM-G 6 Urban Green Space and Policy GM-S 5 Flood Risk and the Water Environment

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	climate change	effects of climate change across GM?	urban areas, which if not invested in could potentially contribute to increases in the frequency and severity of local flood events. However, if new development is designed in line with best practice on flooding, drainage, provision of green space and design than the impacts of climate change could be mitigated.			
13	Reduce the risk of flooding to people and property	Restrict the development of property in areas of flood risk?	As long as new development is designed to best practice, planning policy guidance and legislation on reducing flooding risk, this option is likely to have no impact on reducing the risk of flooding to people and property. There is the possibility that where a brownfield site is redeveloped and drainage standards are applied that this could lead to a reduction in surface water run off compared to the present situation. However this relies on districts or GM having appropriate drainage standards. The GM SFRA has mapped flood extents taking into account climate change which will help to ensure development is appropriately future proofed	Increased risk of flooding	Policy should reinforce existing guidance and best practice. Policy should link to other agendas, such as those relating to green infrastructure, biodiversity, recreation and health.	Covered by Policy GM-S 5 Flood Risk and the Water Environment, Policy GM-G 4 Lowland Wetlands and Mosslands and Policy GM-G 3 River Valleys and Waterways

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			Although areas of Green Belt are proposed for development there is opportunity to address existing flooding issues and provide a positive solution to these in the long term			
13	Reduce the risk of flooding to people and property	Ensure adequate measures are in place to manage existing flood risk?	As long as new development is designed to best practice, planning policy guidance and legislation on reducing flooding risk, this option is likely to have no impact on reducing the risk of flooding to people and property. There is the possibility that where a brownfield site is redeveloped and drainage standards are applied that this could lead to a reduction in surface water run off compared to the present situation. However this relies on districts or GM having appropriate drainage standards. The GM SFRA has mapped flood extents taking into account climate change which will help to ensure development is appropriately future proofed Although areas of Green Belt are proposed for development there is	Increased risk of flooding	As above.	Covered by Policy GM-S 5 Flood Risk and the Water Environment, Policy GM-G 4 Lowland Wetlands and Mosslands and Policy GM-G 3 River Valleys and Waterways

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			opportunity to address existing flooding issues and provide a positive solution to these in the long term			
13	Reduce the risk of flooding to people and property	Ensure that development does not increase flood risk due to increased run-off rates?	As long as new development is designed to best practice, planning policy guidance and legislation on reducing flooding risk, this option is likely to have no impact on reducing the risk of flooding to people and property. There is the possibility that where a brownfield site is redeveloped and drainage standards are applied that this could lead to a reduction in surface water run off compared to the present situation. However this relies on districts or GM having appropriate drainage standards. The GM SFRA has mapped flood extents taking into account climate change which will help to ensure development is appropriately future proofed Although areas of Green Belt are proposed for development there is	Increased risk of flooding	As above.	Covered by Policy GM-S 5 Flood Risk and the Water Environment, Policy GM-G 4 Lowland Wetlands and Mosslands and Policy GM-G 3 River Valleys and Waterways

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			flooding issues and provide a positive solution to these in the long term			
13	Reduce the risk of flooding to people and property	Ensure development is appropriately future proof to accommodat e future levels of flood risk including from climate change?	As long as new development is designed to best practice, planning policy guidance and legislation on reducing flooding risk, this option is likely to have no impact on reducing the risk of flooding to people and property. There is the possibility that where a brownfield site is redeveloped and drainage standards are applied that this could lead to a reduction in surface water run off compared to the present situation. However this relies on districts or GM having appropriate drainage standards. The GM SFRA has mapped flood extents taking into account climate change which will help to ensure development is appropriately future proofed Although areas of Green Belt are proposed for development there is	Increased risk of flooding	Policies should include appropriate drainage standards.	Policy GM-S 5 Flood Risk and the Water Environment refers to not exceeding greenfield run-off rates or alternative rates specified in district local plans.

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			opportunity to address existing flooding issues and provide a positive solution to these in the long term			
14	Protect and improve the quality and availability of water resources	Encourage compliance with the Water Framework Directive?	There is a strong regulatory framework that development must comply with. Measures associated with water quality are therefore assumed to be embedded within any new development. As such, a basic level of compliance is assumed across all new development associated with this option. Overall, no additional effect is anticipated as a result of this Option, with the exception of water consumption, which will increase with a net increase in overall housing and employment land.	Both quality and availability of water resources may be reduced	Policy should reinforce existing guidance and best practice in new development, and also seek to bring about improvements in the conurbations surface water network, linking to other agendas.	Covered by Policy GM-S 5 Flood Risk and the Water Environment
14	Protect and improve the quality and availability of water resources	Promote management practices that will protect water features from pollution?	There is a strong regulatory framework that development must comply with. Measures associated with water quality are therefore assumed to be embedded within any new development. As such, a basic level of compliance is assumed across all new development associated with this option.	Both quality and availability of water resources may be reduced	As above.	Covered by Policy GM-S 5 Flood Risk and the Water Environment

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			Overall, no additional effect is anticipated as a result of this Option, with the exception of water consumption, which will increase with a net increase in overall housing and employment land.			
14	Protect and improve the quality and availability of water resources	Avoid consuming greater volumes of water resources than are available to maintain a healthy environment ?	There is a strong regulatory framework that development must comply with. Measures associated with water quality are therefore assumed to be embedded within any new development. As such, a basic level of compliance is assumed across all new development associated with this option. Overall, no additional effect is anticipated as a result of this Option, with the exception of water consumption, which will increase with a net increase in overall housing and employment land.	Both quality and availability of water resources may be reduced	Policy should encourage design in new developments which encourages sustainable water use. This should include housing and employment. Include in design guide recommendation. Continue to liaise with United Utilities as GMSF progresses.	Covered by Policy GM-S 5 Flood Risk and the Water Environment.
15	Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions	Encourage reduction in energy use and increased energy efficiency?	Under this option the population and economic activity in GM will increase from the baseline which will have an impact on demand for energy. This option includes encouraging use of public transport and reduces the need to travel by located homes and businesses	Increased greenhouse gas emissions and reliance on non-renewable energy resources.	The GMSF should exploit low carbon infrastructure technologies. Policy should encourage design in new developments which encourages sustainable energy use.	Covered by Policy GM-S 2 Carbon and Energy

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			close to each other, which in turn reduces the need to travel and use energy.			
15	Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions	Encourage the development of low carbon and renewable energy facilities, including as part of conventional development s?	Under this option the population and economic activity in GM will increase from the baseline which will have an impact on demand for energy. This option includes encouraging use of public transport and reduces the need to travel by located homes and businesses close to each other, which in turn reduces the need to travel and use energy.	Increased greenhouse gas emissions and reliance on non-renewable energy resources.	Policy should encourage the development of low carbon facilities to decouple economic activity with carbon emissions. This should focus on aspects such as energy generation, transport and buildings. Policy should also ensure integration of low carbon/renewable technology in conventional developments.	Covered by Policy GM-S 2 Carbon and Energy
15	Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions	Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?	Under this option the population and economic activity in GM will increase from the baseline which will have an impact on demand for energy. This option includes encouraging use of public transport and reduces the need to travel by located homes and businesses close to each other, which in turn	Increased greenhouse gas emissions and reliance on non-renewable energy resources.	Policy should include a carbon neutral target.	Covered by Policy GM-S 2 Carbon and Energy

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16	Conserve and/or enhance landscape, townscape, heritage assets and their setting	Improve landscape quality and the character of open spaces and the public	have been identifiedreduces the need to travel and use energy.Under this option, developing land in Green Belt on the edge of the urban area might have an impact on the character of the existing landscape and townscapes.Within the urban area they may also be some pressure to build on or adjacent to green and public realm spaces which may have an impact too.Nevertheless, some developments will be subject to specialist assessments such as EIA, landscape assessments and	Landscape quality is reduced and character is lost from various assets until it is diminished.	The GMSF should protect key environmental assets through policy, key landscape/townscape/heritag e assets should be listed for protection. This may include some views to/from key assets. Policy should also seek to improve areas where public realm (etc.) requires improvement, recognising the multiple-benefits associated with such improvements (recreation/health, social interaction, crime reduction,	Covered by Policy GM-E 1 Sustainable Places and Policy GM-E 2 Heritage
	and the character of GM	realm?	heritage impact assessments to mitigate impacts. However there is some uncertainty on the impacts. Development in the Green Belt across GM may enable the positive enhancement of heritage assets and landscapes within the vicinity of the development.		ecology, heritage etc). Policy should recognised the importance of "networks" as well as individual sites/spaces, linking blue/green corridors to maximise various benefits (e.g. ecology benefits, recreation, sustainable transport potential and social	

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					cohesion). Include in design guide recommendation.	
16	Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM	Conserve and enhance the historic environment, heritage assets and their setting?	Under this option, developing land in Green Belt on the edge of the urban area might have an impact on the character of the existing landscape and townscapes. Within the urban area they may also be some pressure to build on or adjacent to green and public realm spaces which may have an impact too. Nevertheless, some developments will be subject to specialist assessments such as EIA, landscape assessments and heritage impact assessments to mitigate impacts. However there is some uncertainty on the impacts. Development in the Green Belt across GM may enable the positive enhancement of heritage assets and landscapes within the vicinity of the development.	Landscape quality is reduced and character is lost from various assets until it is diminished.	Heritage Impact Assessment required to identify any impacts from sites, to conserve and enhance heritage assets and their setting.	Covered by Policy GM-E 1 Sustainable Places and Policy GM-E 2 Heritage

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16	Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM	Respect, maintain and strengthen local character and distinctivenes s?	Under this option, developing land in Green Belt on the edge of the urban area might have an impact on the character of the existing landscape and townscapes. Within the urban area they may also be some pressure to build on or adjacent to green and public realm spaces which may have an impact too. Nevertheless, some developments will be subject to specialist assessments such as EIA, landscape assessments and heritage impact assessments to mitigate impacts. However there is some uncertainty on the impacts. Development in the Green Belt across GM may enable the positive enhancement of heritage assets and landscapes within the vicinity of the development.	Landscape quality is reduced and character is lost from various assets until it is diminished.	Local policies should set out design expectations and codes	Broadly covered by Policy GM-E 1 Sustainable Places and Policy GM-E 2 Heritage, but consideration for more detailed design and codes will be at district Local Plan level.
17	Ensure that land resources are allocated and used in an efficient and sustainable	Support the development of previously developed land and other sustainable locations?	This option includes developing previously developed land and other sustainable locations. Some Green Belt land would be required to be developed with this option, so without further investigation, there is a risk that	Loss of greenfield land.	The GMSF should include a policy about avoiding the development of the best and most versatile agricultural and where it is possible.	Covered by Policy GM-G 10 A Net Enhancement of Biodiversity and Geodiversity

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	manner to meet the housing and employment needs of GM, whilst reducing land contaminatio n		the best and most versatile agricultural land could be developed. This option encourages the redevelopment of derelict land, properties, buildings and infrastructure. This option supports reductions in land contamination through the remediation and reuse of previously developed land.			
17	Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contaminatio n	Support reductions in land contaminatio n through the remediation and reuse of previously developed land?	This option includes developing previously developed land and other sustainable locations. Some Green Belt land would be required to be developed with this option, so without further investigation, there is a risk that the best and most versatile agricultural land could be developed. This option encourages the redevelopment of derelict land, properties, buildings and infrastructure.	Loss of greenfield land.	The GMSF should include a policy about avoiding the development of the best and most versatile agricultural and where it is possible.	As above

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
17	Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contaminatio n	Encourage the redevelopme nt of derelict land, properties, buildings and infrastructure , returning them to appropriate uses?	This option includes developing previously developed land and other sustainable locations. Some Green Belt land would be required to be developed with this option, so without further investigation, there is a risk that the best and most versatile agricultural land could be developed. This option encourages the redevelopment of derelict land, properties, buildings and infrastructure. This option supports reductions in land contamination through the remediation and reuse of previously developed land.	Loss of greenfield land.	The GMSF should include a policy about avoiding the development of the best and most versatile agricultural and where it is possible.	As above
17	Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and	Protect the best and most versatile agricultural land / soil resources from inappropriate development ?	This option includes developing previously developed land and other sustainable locations. Some Green Belt land would be required to be developed with this option, so without further investigation, there is a risk that the best and most versatile agricultural land could be developed.	Loss of greenfield land.	The GMSF should include a policy about avoiding the development of the best and most versatile agricultural and where it is possible.	As above

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
	employment needs of GM, whilst reducing land contaminatio n		This option encourages the redevelopment of derelict land, properties, buildings and infrastructure. This option supports reductions in land contamination through the remediation and reuse of previously developed land.			
18	Promote sustainable consumption of resources and support the implementati on of the waste hierarchy	Support the sustainable use of physical resources?	This sees development continue at quicker rates than at present. This will increase the use of resources including non- renewables. Development will also continue to produce waste during construction and operation. Municipal waste will increase if housing provision increases (assuming this represents an increase in population). Construction and demolition. Municipal waste will increase if housing provision increases (assuming this represents an increase in population). Construction and demolition. Construction and demolition waste from increased building activity will also result and will likely be the most significant factor that affects waste disposal	Waste generation with other schemes; intra-development effects as a number of locations are taken forward	Set design principles based on realistic expectations for new development. Require new developments of a certain size to meet design principles in terms of resources use (including recycled materials). This should relate to construction and operation	Policy GM-S 7 Resource Efficiency, refers to the Resource Strategy for Greater Manchester which promotes overall reduction in the level of waste produced and supports resource efficiency in order to gain the maximum value from the things we produce.

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
18	Promote sustainable consumption of resources and support the implementati on of the waste hierarchy	Promote movement up the waste hierarchy?	This sees development continue at quicker rates than at present. This will increase the use of resources including non- renewables. Development will also continue to produce waste during construction and operation. Municipal waste will increase if housing provision increases (assuming this represents an increase in population). Construction and demolition. Municipal waste will increase if housing provision increases (assuming this represents an increase in population). Construction and demolition. Municipal waste will increases (assuming this represents an increase in population). Construction and demolition waste from increased building activity will also result and will likely be the most significant factor that affects waste disposal	Waste generation with other schemes; intra-development effects as a number of locations are taken forward	None identified	N/A
18	Promote sustainable consumption of resources and support the implementati on of the waste hierarchy	Promote reduced waste generation rates?	This sees development continue at quicker rates than at present. This will increase the use of resources including non- renewables. Development will also continue to produce waste during construction and operation. Municipal waste will increase if housing provision increases (assuming this represents an	Waste generation with other schemes; intra-development effects as a number of locations are taken forward	None identified	N/A

Ref	Objective	Assessment criteriawil I the GMSF	Explanation / summary against overall objective Note: Draw out any <u>specific</u> <u>sensitive receptors</u> where they have been identified	Potential cumulative effects	Mitigation / policy input	How mitigation/policy input has been considered in GMSF 2020
			increase in population). Construction and demolition. Municipal waste will increase if housing provision increases (assuming this represents an increase in population). Construction and demolition waste from increased building activity will also result and will likely be the most significant factor that affects waste disposal			