Greater Manchester Spatial Framework

Initial Consultation on the Evidence

Responses Report

January 2015

1. Background and Introduction

1.1 Greater Manchester Combined Authority/ AGMA Executive Board agreed on the 29 August 2014 that the Greater Manchester Spatial Framework (GMSF) should be progressed as a joint Development Plan Document (DPD). The announcement on the 3 November 2014 of the Greater Manchester Devolution Agreement and the move to directly elected leadership for Greater Manchester clearly has implications for both the preparation and content of the GMSF. The GM Agreement provides for a directly elected mayor with powers over strategic planning, including the power to create a statutory spatial framework for GM. Legislation is required to enable these changes and it is anticipated that the first city region Mayoral election will take place in early 2017.

1.2 The GMSF will express the long term spatial vision for Greater Manchester and be a pro-active tool for managing growth, providing the 'roadmap' for the type of place(s) we want to create. It will focus on the overall spatial strategy, that is, the amount of housing and employment development that should be provided in each district, and the key locations for delivering this (opportunity areas).

1.3 Whilst there is still some uncertainty around the process and timetable for devolution we are continuing to progress the work on the evidence base. One of the fundamental building blocks of the GMSF is to identify an objectively assessed housing and employment land need for Greater Manchester for the period 2012-2033. We have therefore produced an initial evidence paper for consultation to enable organisations to engage with the process in its earliest stages.[1]

1.4 It must be noted that the document was produced before the devolution agreement was announced between Greater Manchester from central government; however the consultation period coincided with announcement. As such the consultation responses reflect this changing status and governance arrangements whereas the document does not. It is important to stress that this stage is very much an initial evidence base gathering exercise.

1.5 This initial consultation forms a scoping exercise for future development of the evidence base and subsequent consultation. This first iteration of the evidence base was consulted on via Email, Survey Monkey and post up to the closing date of 7 November 2014.

1.6 In particular, this consultation sought to seek views on the technical evidence base as well as the general approach and the underlying assumptions that have driven the methodology.

1.7 This report aims to provide more detail regarding the consultation itself, provide an analysis of the key themes/issues that emerged from the representations.
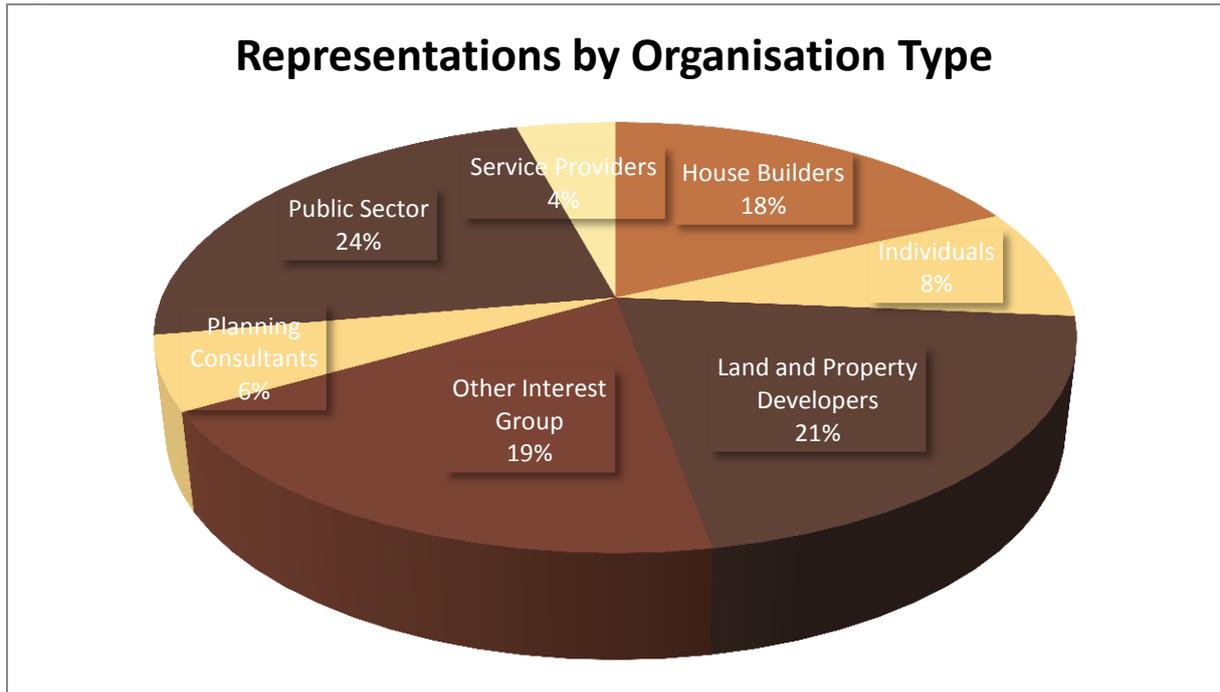
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[1] http://www.agma.gov.uk/what_we_do/planning_housing_commission/greater-manchester-spatial-framework/gmsf-initial-consultation1/index.html

2. Consultation

2.1 A detailed survey was prepared to be read in conjunction with the evidence report and supporting documents[2] and responses collected through an online survey (Survey Monkey), email and post. To promote the consultation the Greater Manchester Integrated Support Team (GMIST) sent out emails to contacts that had been consulted on the Greater Manchester Strategy (GMS) and social media (Twitter) was used by New Economy.

2.2 The survey closed on 7 November 2014 and a total of 94 representations were received, 45 through Survey Monkey and 49 were submitted by Email or post to GMIST. Of the 45 representations from Survey Monkey, 20 skipped all questions (and contact details saved) and 25 answered at least one question. Very few responded to all questions reflecting the specialist, technical and detailed nature of the questions. Of the 49 representations received by Email, 26 were already on the GMIST contact database. Therefore, in total including the 25 Survey Monkey responses, there were 72 representations to analyse (plus 22 to record who just registered an interest at this stage).

2.3 All representations have now been processed and the have been results summarised into an Access database by New Economy for analysis and archiving.

2.4 The representations were submitted by a wide range of respondents including: from other Local Authorities including adjoining districts, service providers, housebuilders, planning consultants and land and property developers. There were a number of environmental groups represented such as the Environment Agency, the Woodland Trust and Red Rose Forest. There were also a number of individual responses and others from interest groups such as the Woodford Neighbourhood Forum, the Bury Green Party, UNITE, Corridor Manchester and the GM Cycling Campaign. A full list of the organisations who responded to the consultation is provided in the Appendix and the distribution is highlighted below in Figure 1. The largest groups represented are the public sector (24%) and land and property developers (21%).

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[2] http://www.agma.gov.uk/what_we_do/planning_housing_commission/greater-manchester-spatial-framework/index.html

Figure 1

Representations by Organisation Type

2.5 The groups represent a diverse range of interests and provided very useful and detailed feedback into the use of evidence to inform the future DPD. The survey was structured into sections: General, Housing and Employment and this is reflected in this report. This report identifies the key themes which emerged from the responses; it does not provide a sequential analysis of responses to all 42 questions.

3. Themes

3.1 In general there is strong support for the rationale of the GMSF and future DPD across the spectrum of representations (including from major housebuilders, land developers, neighbouring local authorities and statutory consultees) and also strong support for the vision being linked to the aspirations set out in the GMS. The vast majority of representations explain that the evidence presented and the conclusions reached do not go far enough to meet the ambitions of this vision. For example, the proposition that GM is a single Housing Market Area is consistently rejected and the objectively assessed housing need and employment growth is considered to be flawed and too low to accord with the growth vision as presented in the GMS. These issues, and others will now be considered in more detail.

General

Area of Assessment

3.2 There appears to be general agreement that GM is a recognised and appropriate basis for assessment especially given its history of collaboration. In particular, in light of devolution it is an increasingly recognised unit of governance. However, it is also recognised that, although GM as a geographical entity is a reasonable focus it does need to be set in a wider context particularly in relation to employment, housing, environment and infrastructure provision. The economic functional area is clearly not confined to the borders of GM and a broader spatial approach needs to be recognised. Furthermore, transport is inherently cross boundary and the labour market clearly does not fit administrative boundaries.

3.3 A few representations from individual residents did express concerns that they did not feel part of GM, but associated themselves more with Lancashire or Cheshire with there being too much focus on the regional centre rather than concern for more outlying areas. More broadly, a representation from Manchester University suggests that the consultation document does not have a sufficient spatial dimension i.e. it simply takes GM as a unit and is not "spatial at all". They go on to say that it is the internal spatial variations which the GM spatial strategy has to deal with and as such how to make use of the strengths in certain areas to benefit the wider spatial area and how to mitigate the problems that one area has over another. This wider spatial context is particularly important when considering spatial connectivity and flows for longer term and strategic development.

3.4 Within the GMSF four principles were put forward that any recognised area of assessment should fulfil and these were: to be strongly based on evidence; be the same for both housing and employment floorspace; not cut across local authority boundaries; and be manageable and having regard to the structures required for successful cross-boundary planning. Very few representations agreed with all 4 principles. Whilst most agreed with the first principle around the need for strong evidence there was considerable objection to the remaining three, suggesting that they have no basis in national policy or guidance. Peel Group, for example, consider that the approach to identifying the 'area of assessment' fundamentally fails to conform to the National Planning and Policy Framework (NPPF) and Planning Policy Guidance

(PPG). PPG demarcates a clear methodology for defining and identifying the geography of distinct housing and economic market areas. They contend that "there is no justification for following a different methodology or for introducing additional competing principles which undermine or cut across the PPG guidance". Peel suggest that the four principles should matched with PPG methodology.

3.5   Peel Group are not alone in expressing this view and others such as Russell Homes, Bloor Homes, Emerson Group and Langtree Carrington, to name but a few, all dispute these principals. Bloor Homes go on to say that principles 2, 3 and 4 should not be used to artificially constrain the assessment area and Russell Homes suggest that principles 2, 3 and 4 appear to conflict with principal 1 where evidence for Housing Market Areas (HMA) and Functional Economic Market Areas (FEMA) is not simply associated with ease of analysis and management. There is significant evidence within the consultation document of cross boundary HMAs and FEMAs, with all neighbouring authorities having the potential to play some role in the GMSF's overall influence and eventual outputs, and this cannot be ignored in the assessment or policy preparation.

3.6   It is clear that the evidence base will be key in defining housing and employment areas; adjoining authorities clearly need to be consulted and included in these assessments. Respondents have suggested that the evidence must correlate with any area of assessment that fits a particular issue and therefore must be flexible enough to accommodate this where necessary.

Vision

3.7   There is general support for the broad vision of the document, specifically in its link with the Greater Manchester Strategy (GMS) but there is a general view that the vision lacks ambition. The Environment Agency, for example, agree that the vision for the GMS should form the basis for the GMSF which in turn will form one of the key vehicles for GMS delivery. The GMSF role in identifying and managing the spatial implications of GM's vision is critical, but the evidence presented does not go far enough especially around understanding and balancing the impacts, risks and also opportunities that GM's natural environment plays within this. The National Trust argue that the vision is too one-dimensional (i.e. economic) and needs to embrace social and environmental improvements. The challenge is to not only safeguard what is good and valued, but to extend and enhance it and ensure that those improvements bring with them economic and social benefits as well. They go on to say that the lack of any reference to heritage in the vision is deeply worrying as this directly ties in with GM's tourism offer.

3.8   Peel Group, in broad terms agree with the general vision and ambition of the GMSF but say that this vision is in no way reflected in the Initial Evidence report put forward, which is based on "historic trends and will perpetuate past inadequacies". For example, there does not appear to be an appropriate set of strategic objectives within the vision against which the GMSF can test various growth scenarios. It is argued that without these objectives the vision itself is of limited value and not informed by an understanding as to what "sustainable economic growth" means for Greater Manchester over the next 15 to 20 years. In particular it makes no reference to a spatial approach to retaining "talent" despite this being a key objective of the Greater Manchester Strategy. It makes no reference to any objectives in relation to housing type or the places where it will be delivered despite conclusions by the Manchester

Independent Economic Review (MIER) and Greater Manchester Growth Plan (GMGP) that this is a key issue for the growth of the city. As such the document is yet to become spatial and will need to be developed to inform strategic objectives for a future DPD.

3.9 Similarly, Taylor Wimpey Ltd object to the vision as it currently stands as it does not "proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places" that the conurbation needs. They note that the current wording does not make any reference to building for the future or how development of the built environment forms part of the vision for GM. It is claimed that this does not align with the visions set out in certain adopted Core Strategies in Greater Manchester. For example, Trafford Borough's Core Strategy vision refers to "housing growth", whilst the vision of the Manchester Core Strategy cites a need for "a significant increase in the quality and quantity of housing". To meet the tests of soundness within the DPD process, the vision must be 'positively prepared' i.e. despite residential development being a prerequisite to sustainable economic growth, housing is not mentioned in the vision and be justified i.e. at present the vision is not based on proportionate evidence. The vision is based on The Manchester Independent Economic Review and the Greater Manchester Growth & Reform Plan and as such focuses too heavily on economic growth to the detriment of its social and environmental role, particularly the built environment.

Scope

3.10 As with the vision, the scope of the GMSF is argued to be too narrow and that only a minimum level of issues are addressed. For example, Harrow Estates suggest that the GMSF is "rather staid and generally lacks ambition". Several respondents similarly raised the specific points below urging for the scope to be widened:

- HS2 should be directly referenced in the vision and explicitly cited within the document;
- the historic environment, local identity and character should be taken into account wherever possible
- the scope should be strengthened to include specific reference to the natural environment and green infrastructure and ecosystems;
- there is a need to provide an innovative approach to delivering growth or at least to set out and assess new models of sustainable economic growth;
- retail should also be referenced, as it is a key component and issue particularly for GM's town centres and economies;
- there is no mention of a Green Belt review in the document and this clearly needs to be addressed;
- there needs to be a process established and clarified regarding community engagement and also with the private sector;
- broadened away from just economic issues to include what a spatial plan is expected to cover, particularly quality of life, environmental issues and transport.

3.11 In essence, the evidence presented within the GMSF will not serve to put the GMS vision into practice.

Opportunities

3.12   The opportunities cited in the document are agreed with, but there are a number of opportunities which are absent. HS2 is considered to be a "fundamental omission" by CBRE as a key future economic driver. This should be seen as a "landmark development" with a series of new buildings in the Manchester Piccadilly area. They note the lack of a tall building strategy arguing that the HS2 Manchester Piccadilly area should be the receptor of tall buildings in GM, to accord with the high density development that is proposed.

3.13   The concentration of knowledge assets should be more explicitly recognised especially in relation to the Manchester Corridor which is a clear identifiable opportunity and there should also be consideration of and opportunities to grow the number of visitors to GM.

3.14   As mentioned under vision and scope there are a number of key opportunities regarding Green Infrastructure and natural land assets. The Woodland Trust note their disappointment that the commitment to a strong healthy natural environment in the vision statement is not carried forward into the "opportunities" section of the document. There is increasing evidence that a healthy natural environment can contribute to both the health and wellbeing of the population and also can enhance economic competitiveness and this needs to be reflected spatially within the document. In particular, trees and woodland as part of a well planned network of Green Infrastructure can play a vital role within sustainable building and improving air quality as well preventing economic disruption caused by surface water flooding. The asset of the countryside has been forgotten within the evidence of the GMSF and should be addressed as it is a key opportunity. The countryside is a major means of meeting local needs for recreation and leisure where expectations are likely to increase in the years ahead. Attractive countryside has considerable recreational value, a major factor which influences potential inward investors with major implications for economic development. Furthermore, a locational decision factor for many households is the ability to enjoy rural landscape amenity and this is reflected in the purposes of Green Belt and other environmental and landscape designations.

3.15   Warrington Borough Council point out that consideration of logistics for the area is a key opportunity within the wider "Atlantic Gateway" context and reference should be made to the Greater Manchester Logistics Study once it is published. Langtree Carrington Group Ltd go on to say that the opportunities highlighted in the document on their own will be insufficient to provide all of the necessary growth or meet all of the demand for employment land in the locations where this is required throughout the plan period. Additional strategic opportunities are available and these should also be considered. These include opportunities at Carrington along with the adjacent Voltage Park (National Grid) site. Carrington provides an opportunity to deliver 8 million square foot of logistics and advanced manufacturing uses along with a Green Energy park and office campus which could deliver up to 11,000 associated employment opportunities.

3.16   CPRE believes that greater prosperity for the sub-region and beyond will depend upon upgrading public transport opportunities with other northern cities in the corridor from Merseyside to the major cities of Yorkshire (provided that there is no detriment to the countryside). They advocate electrification of the existing rail routes between northern city regions to upgrade existing services and a modal shift away from road

dependency to negate the adverse impact this has on air quality and associated health problems is a real opportunity not only for GM but for the north as a whole

3.17 Russell Homes suggest that the consultation document should identify two important existing attributes that can be maximised to release Greater Manchester's full economic potential, helping it to boost economic competiveness. Firstly, the M60 and M62 motorway corridors. The strategic importance of these is critical when considering employment opportunities and sets it apart from other city regions in the UK. Secondly, land to facilitate growth, it is imperative that a supply of land is readily available for development to unlock growth opportunities. There cannot be an overreliance on brownfield land, with its proven complex issues and the issue of green belt land is an opportunity that should be addressed. It is suggested that a green belt review is urgently required to release strategic sites for development to provide a real competitive advantage over other areas.

3.18 Clear opportunities exist, of course, within the new evolving structure of devolution of fiscal and mayoral powers which confer major competitive advantages that need to be grasped by the DPD.

Migration

3.19 A number of representations pointed out that the Office for National Statistics (ONS) have severely underestimated migration. A migration figure of 500 persons per annum, as quoted in the consultation document, is generally considered to be unrealistic especially as the annual migration figure was 4,000 persons per annum during the last decade.

3.20 Cheshire East agree that the evidence suggests that no adjustment needs to be made to the migration assumptions in the ONS 2012-based population projections, but suggest comparing the ONS 2013 mid-year population estimates with the 2012 subnational population projections as there may be differences i.e. projected growth vs actual growth.

3.21 It is argued that the migration figures presented in the consultation report simply do not match the aspirations as set out in the vision of a region aspiring to be a European premier city. Harris Lamb, Bloor Homes and the Strategic Land Group highlight, amongst others, that as the migration assumptions are based on past trends they are influenced by factors including available stock and in particular the lack of affordable housing as well as past economic conditions. Past migrations rates are more likely to constrain growth than help facilitate a step change in a global city with an ambition to 'compete globally for talent'. If GM is to become a 'world class' city there will be an associated requirement to recognise an uplift in migration. More specifically it is suggested that migration arising from the Manchester Airport Enterprise Zone needs to be considered.

3.22 Redrow Homes noted from the GMSF that the 2012 based projections currently forecast that net outmigration will increase in the future compared with what has recently been experienced. This is in direct contrast to one of the stated ambitions of Greater Manchester, which is to retain a greater proportion of the population. Strategic Land Group commented that planning for migration in this way could serve as a self-fulfilling prophecy, forcing working aged habitants out of the city in the future. It is suggested that whilst ONS 2012 based population projections are a good starting

point, consideration should be given to alternative migration trends and some alternative migration assumptions must therefore be tested at this stage.

Commuting

3.23 The Highways Agency noted within the consultation that net commuting masks the real impact of changes in traffic behaviour. A 'no change' assumption for net commuting will not help to tackle transport sustainability issues of the Framework as there could be a significant increase of in-commuting and out-commuting leading to the same net figure. A focus on maintaining the proportion of in/out commuting compared to total commuting levels would be more appropriate to achieve the aims of sustainable transport especially as GM sees itself as a low carbon economy in the future. If the region is to meet its ambitions it is likely to become more attractive and thereby in-commuting may increase, therefore it should not assume 2011 Census levels.

3.24 Recent experience by the Highways Agency in the use of GMFM forecast (when translated into traffic growth) far outstrips capacity of the highway networks. This does not allow for any objective evidence based analysis on highway infrastructure needs. This would need to be addressed should the current suite of transport models be utilised to test the impacts of the Framework. In essence, they raise the question as to whether the forecasting model takes into account all transport network constraints.

3.25 Although the 'no change' assumption can be used as a starting point it must be recognised that in-commuting will be influenced by the availability of housing, employment opportunities in Greater Manchester and their interrelationship. These factors need to be understood if the evidence base is to be robust. High Peak Council suggest that significant increases in net in-commuting should be avoided as this may exacerbate matters on currently constrained transport links that connect High Peak with GM. It is also noted by the North West Transport Roundtable that net in-commuting will be affected by the rapidly growing trend for home working. As this is continuing to rise at a significant rate, it would be appropriate to assume that net in-commuting will not and that a new calculation should be produced to take this fact into account. CPRE also highlight this homeworking trend and they believe that improved public transport is crucial to facilitating localised economic growth and controlling pollution and congestion in the future. They argue that GMSF does not do enough on how the sub-region should encourage a modal shift away from road uses to cleaner and more efficient rail and bus transport.

Environment

3.26 A number of points were raised regarding the environment particularly in relation to scope, opportunities and vision as outlined above. Bury Green Party suggest that a long term plan towards the re-greening of GM should be an integral part of the future DPD.

3.27 Red Rose Forest highlight that strategic Green Infrastructure essentially needs to be included within the scope of the document and treated like other infrastructure and properly planned, coordinated, delivered, resourced and maintained. Furthermore, plans relating to River Basins and Catchments and strategic work in relation to the Water Framework Directive and flooding also needs to be considered as well as strategic Blue Infrastructure and in particular the significance of canals. Lancashire

County Council point out that given considerable future demand for housing and employment sites in GM, significant pressure may be placed on areas at risk of flooding and this should be taken into account.

3.28 It is suggested by Natural England that the work being done by the GM Low Carbon Hub- Natural Capital Group including the Red Rose Forest project identifying specific ecosystem service pinch points across Greater Manchester should be at the heart of the plan. Natural England considers that there are a number of environmental designations and issues which may affect the size, scale, form and delivery of housing sites that should be taken into account.

3.29 NW Transport Roundtable highlighted that until recently, all Local Authorities were required to collect information for the National Land Use Database on Previously Developed Land (NLUD and PDL) and send it to government. Although it is no longer a statutory requirement for them to do this, many have continued to collect this information. Brownfield land assessment is essential to ensure that the maximum is brought forward for redevelopment.

Housing

Housing Market Areas:

3.31   There is a general consensus that Greater Manchester does not constitute a single housing market area. Ainscough completely disagree with the proposition that Greater Manchester is a single Housing Market Area [HMA]. It is suggested there is no evidence for this assertion. Barton Willmore, the Peel Group/Turley and Nathaniel Lichfield & Partners [NLP] consider there to be four or more housing market areas within GM. They state there is evidence to suggest that these housing market areas are not artificially constrained by local authority areas and may extend to parts of Cheshire, High Peak and Rossendale. It is noted that this is recognised within the GMSF in accordance with the NPPF and that further work will consider sub regions. However, according to the Peel Group the notion of Greater Manchester forming one housing market area "is a fundamentally flawed starting point and one that is totally at odds with the national policy in NPPF and accompanying guidance in PPG" (Turley/Peel Group, 2014: Doc. 4, para. 2.21, p12).

3.32   Nathaniel Lichfield & Partners Limited (NLP) submitted representations on behalf of Taylor Wimpey UK Ltd, Barratt Developments PLC & Bellway Homes Ltd. They contend the GMSF inference that the ten Greater Manchester local authorities collectively form one self-contained Housing Market Area [HMA] and also a Functional Economic Area [FEMA] "is insufficiently supported by the evidence; is overly simplistic; and lacks rigour" (NLP, 2014: para. 3.9, p11). Meanwhile, Turley who have submitted representations on behalf of the Peel Group, explain that a Strategic Housing Land Availability Assessment (SHLAA) and an Employment Land Study should also form part of the evidence base.

3.33   NLP and Turley both refer to the Greater Manchester SHMA (December 2008 and May 2010 update) claiming that this evidence suggests that Greater Manchester probably contains four HMAs. It is argued that the methodology utilised in the current iteration of the GMSF does not comply with planning policy guidance paragraph 2a-011-2014-0306. It is advised by NLP and Turley that a new SHMA should be prepared first in accordance with practice guidance prior to addressing the scale of need. Furthermore, Turley/Peel Group suggest that it is important to have "an accurate definition of the housing market area" as "the robustness of the objectively assessed housing need is reliant" on this (Turley/Peel Group, 2014: Doc 3, para. 2.3, p2).

3.34   According to Turley/Peel, the four HMAs covering Greater Manchester are: the central parts of the conurbation, comprising areas within Manchester, Salford and Trafford; the north east including the authorities of Oldham, Rochdale and Tameside; the south, namely the outer parts of Trafford and Stockport boroughs as well as neighbourhoods in South Manchester; the north west part of Bolton, Bury, Salford West and Wigan (Turley/Peel Group, 2014: Doc 3, para. 5.1, p18). Indeed, Barton Wilmore suggest that an assessment of economic-led housing need should be undertaken at the individual housing market area geographical scale.

3.35   Moreover, Turley/Peel Group explain that Principles 2-4 for the assessment of housing market areas do not accord with Planning Policy Guidance (PPG). They note that PPG advises that a 70% threshold typically serves as an important indicator to evidence a level of self-containment of a housing market area. It is explained that such evidence

has been utilised in some GM local authorities' evidence base. NLP and Turley both highlight the example of Rochdale Council's Strategic Housing Market Assessment (SHMA) Update [October 2014] which stated:

"Rochdale Borough can be described as a self-contained housing market area in terms of the movement of households but it is part of a wider functional economic area extending into neighbouring areas of Greater Manchester" (Rochdale, 2014: para. 3.9: 28).

3.36 Turley/Peel Group suggest that the following actions be implemented in regard with defining housing market areas:
- The application of PPG methodology specifically the "principal" tests of household migration and house price analysis.
- It is suggested there is no evidential basis for moving away from the four housing market areas defined through previous research in Greater Manchester.
- It is advised that sub-authority analysis is conducted as housing markets do not precisely conform to local authority boundaries as stated in the PPG. In addition, sub-authority migration data should be considered once available (Turley/Peel Group, 2014: para. 6.2, p20).

Objectively Assessed Housing Need

3.37 The fundamental concern expressed by influential respondents (major housebuilders and The Peel Group) is that it is necessary to prepare a comprehensive SHMA for areas across Greater Manchester prior to assessing and calculating the Objectively Assessed Housing Need.
3.38 NLP suggest that the GMSF utilises an overly simplistic approach to modelling, they advise utilising a model such as PopGroup. Turley/Peel also advocate the use of PopGroup "to provide variant forward looking projections – alongside trend based projections – taking into account differing levels of employment growth" (Turley/Peel, 2014: Doc 2, para. 2.3, p3). It is claimed the scenario does not analyse the data inputs sufficiently, and alternative pro-growth scenarios are excluded at an early stage of the consultation process.
3.39 NLP contend the 10,706 dwellings per annum stated as the Objectively Assessed Need [OAN] "only represents the demographic starting point for analysis and requires a significant upward adjustment to address worsening market signals, meet affordable housing needs in full, and align with economic objectives" (NLP, 2014: para. 3.41, p17). NLP suggest that the GMSF incorrectly assumes the demographic baseline scenario and the housing OAN to be the same.
3.40 Similarly, Turley/Peel explain that the OAN is based "solely on the translation of the 2012 Sub National Population Projection (SNPP) dataset into households and dwellings" (Turley/Peel, 2014: Doc. 2, para. 1.6, p1-2). It is suggested the contention that no adjustment is required to this projection dataset to reflect demographic data, economic evidence or market signals is incorrect and not compliant with PPG (Turley/Peel, 2014: Doc. 2). This explains that the 2012 SNPP dataset is unduly negatively impacted by the status of the post-recession economy.

3.41 According to Turley/Peel the GMSF utilises an "inflexible and pessimistic approach in considering alternative projections of need" instead of selecting single datasets at key points of the process to assess needs rather than developing a range of alternative growth scenarios (Turley/Peel, 2014: Doc 2, para. 6.3, p29).

3.42 Turley/Peel have undertaken modelling which conveys that Greater Manchester should be planning to provide for a minimum of 13,000 dwellings per annum. It is suggested that such a scale of growth would signify a continuation of levels of estimated migration over the last decade, accords with analysis of market signals and would support a greater level of labour-force growth than that projected under the 2012 SNPP (Turley/Peel, 2014: Para. 6.22, p31).

3.43 In order to achieve a level of job growth based on the Experian job growth figures in Section 6 of the GMSF, this would necessitate a dwelling requirement in excess of 15,000 dwellings per annum (Turley/Peel: para. 6.16, p31). Peel suggest the Experian scenario is more representative of the shared ambitions of the GM Strategy and other strategies. Therefore, Peel advocate "a housing requirement of at least 15,000 dwellings annually if demographic and economic needs are to be properly addressed (Peel Cover Letter, 2014: 3).

3.44 This clearly presents a significantly higher level of need than that stated in the GMSF eivdence. Turley/Peel suggest this demonstrates the importance of further considering the relationship between job growth and the level of housing required to support the economic potential of Greater Manchester (Turley/Peel, 2014: para. 6.16, p31).

3.45 NLP have also expressed significant concerns in regard with the limited number of scenarios modelled by the GMSF. NLP present five demographic/employment-led scenarios incorporating recent demographic trends, the 2012-based SNPP, 2011/2008-based CLG household projections and the September 2014 Experian job growth projections (NLP, 2014: para. 3.32, p15).

3.46 According to NLP the GMSF OAN figure is above the 2011-based household projection, which constitutes the 'starting point' for undertaking an OAN housing analysis according to the Practice Guidance. This is explained to be broadly equivalent to NLP's Scenario Bb based on the partial catch up headship rate (an amalgamation of the 2008 and 2011-based headship rates post 2021) (NLP, 2014: para. 3.33, p15).

3.47 NLP explain there is not a clear causal relationship between job growth and housing need, although they are related. Nevertheless, they suggest that proposed housing provision should correspond with economic aspirations; otherwise this would create inconsistencies in Local Plans.

3.48 It is argued that if Greater Manchester is to "become the 'northern powerhouse' envisaged, then a substantial uplift to the 10,706 dpa identified in the GMSF is necessary" (NLP, 2014: para. 3.40, p17). This view is broadly representative of the principal housebuilders and consultants who suggest that the OAN housing figure over the plan period is too low, insufficiently robust, unrealistic, and incompatible with projected economic and employment growth.

3.49 It would be difficult to arrive at a 'consensus' OAN housing figure from the respondents' representations as they utilise a diverse range of demographic models. Indeed, several respondents simply state OAN figures without disclosing a methodology or adequate supporting evidence.

3.50 For brevity, the average range of objectively assessed housing need submitted by respondents was 13,000 to 15,000 dpa. For example, Ainscough and The Peel Group suggest 13,000-15,000 dpa to be the minimum OAN; Emerson Group- 13,000 dpa;

Persimmon Homes, Rowland Homes and Wain Homes- 15,000 dpa. Barratt Developments, Barton Willmore, Redrow Homes, Cheshire East Council and Russell Homes state that the OAN is too low and do not specify any calculated OAN figures. Blackburn with Darwen Borough Council and Colliers Commercial Estates Group agree with the GMSF OAN. The Campaign to Protect Rural England suggest the OAN figure is "excessively high" and they believe not more than 221,071 net additional dwellings are required over the plan period.

3.51 Meanwhile, modelling presented by Turley/Peel demonstrates that a continuation of recent migration levels which reflect pre and post-recession trends, establishes a requirement for a minimum of 13,000 dwellings per annum across Greater Manchester (Turley/Peel, 2014: Doc. 2, para. 6.12, p30). Further, Turley/Peel suggest that their modelling demonstrates that in order to achieve the level of employment growth based on Experian job growth figures set out in Section 6 of the GMSF, the dwelling requirement would be in excess of 15,000 dpa (Turley/Peel, 2014: Doc. 2, para. 6.16, p31).

3.52 NLP has calculated economic based scenarios, utilising the aforementioned Experian Job Growth Scenario as also used Turley/Peel above, which convey that the housing need in the Greater Manchester HMA would be between 17,248 dwellings per annum (dpa) and 17,977 dpa scenario (depending upon which approach, the index or partial catch up, is taken to household formation rates post 2021) (NLP, 2014: para. 3.35, p16).

3.53 The divergence between the Turley/Peel and NLP OAN figures is due to the use of contrasting demographic trend-based projections. These are difficult to precisely quantify from their respective calculations. Although, Turley and NLP both utilise PopGroup demographic modelling software; Turley also utilise modelling components from Edge Analytics.

Affordable Housing

3.54 NLP insist that an assessment of affordable housing need should be "undertaken as part of a comprehensive SHMA at the outset and not left to later stages of the GMSF" (NLP, 2014: 19); Turley/Peel state that the current position is contrary to the NPPF. Meanwhile, Turley/Peel explain that their calculation of affordable housing needs suggests there will be a continual need for affordable housing estimated to be approximately 6,000 affordable homes per annum across Greater Manchester (Turley/Peel, 2014: para. 6.19, p31). According to PPG, this is an estimate of how much of the total OAN should be delivered as new affordable housing.

Past Performance on Housing Delivery

3.55 NLP explain that the GMSF makes no allowance for past performance on housing delivery. It is claimed that Greater Manchester has considerably under delivered housing units in relation to previous targets. The inference is that future projections based on past trends will exacerbate this situation. According to NLP, the GMSF needs to evaluate this in modelling and include an upward adjustment for this market signal (NLP, 2014). Turley/Peel strongly disagree with the GMSF position of disregarding past performance. They contend that this will result in "trends of unmet

housing need and worsening affordability will simply get worse" (Turley/Peel, 2014: para. 6.40, p38).

Housing Mix

3.56　It is explained there is a requirement to provide a range of house types (and particularly aspirational family housing) in places where people want to live. NLP suggest this issue should be assessed at an earlier stage of the process (NLP, 2014). Turley/Peel explain it is necessary for the GMSF to consider: the amount, type, tenure, size and range of homes required within each of the specific Housing Market Areas (Turley/Peel, 2014).

Vacancy/Second Home Rates

3.57　The GMSF states that 3.5% of new dwellings will be vacant or second homes. NLP explain that this approach is "too simplistic and underestimates [the] true levels of empty homes likely to arise" (NLP, 2014: 19). It is suggested local authority figures including data from Council Tax registers should be used to calculate the respective rates.

Employment

Employment Scenarios

3.58 NLP and Turley/Peel note that the GMSF utilises GMFM 2013 rather than higher Experian projections. It is suggested that the latest September 2014 Experian projections "should be included in future modelling analysis and retained as a 'pro-growth' option that provides a closer alignment with the 'One North' strategy" (NLP, 2014: 19). Similarly, Turley/Peel explain that GMSF employment requirements are "presented as a single, concluded position, with no alternative scenario(s)" (Turley/Peel, 2014: 2). Ainscough also consider the mooted employment growth to be conservative and under ambitious i.e. projected growth of 0.7% per annum which is lower than 0.8% achieved between 1998 and 2007.

3.59 Turley/Peel explain the economic and employment forecasts presented are effectively "baseline" assessments and are not indicative of economic potential or actual needs, as high growth options are rejected prior to testing. They insist that the GMSF "must rigorously test a high growth scenario(s) which more closely reflects its stated economic and social ambitions" (Turley/Peel, 2014: Doc. 1, p3). This has created an 'employment-housing mismatch' according to Turley/Peel with regard to the integration of employment and population/housing forecasts. (Turley/Peel, 2014: Doc. 1, p28).

Economic Activity

3.60 NLP highlight the heightened levels of growth in participation rates for existing residents which exceed projected national growth rates. Therefore, they contend that the GMSF avoids the need to deliver a greater number of housing units to correspond with growth projections.

3.61 NLP advocate a more nuanced and realistic approach towards economic activity growth rates. They state "it is wrong to assume that the increased population levels projected in the GMSF can simply accommodate higher levels of job growth" (NLP, 2014: 19). It is suggested that economic growth aspirations must be accompanied by an increase in good quality housing in order to ensure alignment with other strategies (NLP, 2014: 19).

3.62 Meanwhile, Turley/Peel interpret the approach to utilise fixed resident employment rates applied to the whole population. They contend this does not adequately consider the "changing demographic profile of the population or the migration profiles associated with people moving into or being retained within Greater Manchester to take up employment opportunities" (Turley/Peel, 2014: Doc 4, para. 6.21, p35).

3.63 Another deficiency regarding the evidence base is noted by Turley/Peel who explain that an Employment Land Review has not been conducted (Turley/Peel, Doc. 1, p19).

3.64 Turley/Peel note the potential of planned economic investments towards creating significant levels of job growth in the short to medium term (Turley/Peel, 2014: Doc 2, para. 4.33, 22). It is explained that this growth including the potential of the Northern Powerhouse is more likely to be captured within the higher levels of job growth implied by the Experian scenario (Turley/Peel, 2014: Doc 2, para. 4.33, p22).

3.65 Several respondents including Turley/Peel and the Seddon Group do not agree with the use of past development rates for calculating future projections for the plan period as they argue that these do not align with Greater Manchester's growth ambitions and

underestimate economic potential (Turley/Peel, 2014: Doc 4, para. 5.38, p21). For example, in relation to manufacturing, it is argued that the GMSF does not adequately reflect the requirement for Greater Manchester to sustain growth and grow its significant manufacturing base. Seddon Group highlight that the Greater Manchester Manufacturing Strategy (Draft New Economy 2014) stated that the manufacturing industry in Greater Manchester is estimated to grow from £6.7 billion to £10 billion by 2027 and this needs to be recognised in the plan. They explain that manufacturing companies have been constrained by a lack of high quality premises and readily developable sites in prime motorway locations, suggesting that the use of previous development rates, as a basis for projecting forward throughout the plan period, is likely to be inaccurate (Seddon Group, 2014).

3.66   Turley/Peel do "agree that the slowdown in recent levels of development of office floor space has resulted in an increasingly constrained supply of Grade A floor space" (Turley/Peel, 2014: Doc. 4, para. 5.30, p20).

3.67   Turley/Peel suggest that it is inappropriate to assume a joint industrial and warehousing density. They consider it to be misleading to combine industrial and warehousing sectors "given wide variations in B1c/B2 compared to B8 uses and the densities at which employment occurs in these discreet sectors" (Turley/Peel, 2014: Doc. 4, para. 5.47, p23). Furthermore, they do not agree with the 12% uplift in industrial and warehousing development rates derived from 2004-2012 as a minimum basis (Turley/Peel, 2014: Doc 4, para. 5.53, p24). The three options presented for industrial and warehousing floor space provision are also dismissed.

3.68   Indeed, Option IW1 is considered to be an inappropriate basis on which to plan. Turley/Peel warn that it is incorrect to select a single option as 'preferred' as this is inflexible. Turley/Peel advise that a range of floor space requirements should be considered and presented: these should be aligned with the economic ambitions of Greater Manchester; include an allowance for a 'margin of choice' to allow smooth operation of the property market; and present a range of floor space requirements rather than a 'preferred' option (Turley/Peel, 2014: Doc. 4, p26). In addition, Turley/Peel do not agree with the three options presented for office floor space provision. Overall, Turley/Peel contend that Greater Manchester's economic growth ambitions are not suitably represented in the floor space options presented.

3.69   It is also noted that consideration needs to be given to the sustainable use of land as a precious resource, for example, the amount of ancillary space designated to be car parking is questioned. According to respondents the ambition should be to increase the average plot ratio of 35% for new industrial and warehousing provision to 40% in a phased manner. It was further suggested that the modelling should consider strategic interventions to stimulate economic growth, for example Airport City.

Next Steps

3.70   From the issues outlined above regarding the evidence base presented in the GMSF it is clear that there will a need for a number of actions to be sanctioned as soon as possible. These are outlined in the table of recommendations below.

Figure 2 : Recommendations

Action	Comment
Testing of different growth scenarios	Consider GMFM 2014 and compare with the latest Experian projections. Alternative migration trends and assumptions should also be assessed.
Production of a Strategic Housing Market Assessment for Greater Manchester	This would include a full Objectively Assessed Housing Need, present clear housing across the districts' housing market areas (which will have been reviewed as part of this assessment).
Production of an Employment Land Study/Assessment for Greater Manchester	This is important to produce as this will convey a spatial distribution of available employment sites to match our growth ambitions.
Green Belt Review	This would provide developers with greater certainty regarding potential developments in the Green Belt.
Green Infrastructure Assessment	Undertake a review of the existing evidence. This is important for the quality of life for GM residents.
Brownfield Land Assessment	Undertake a review of the existing evidence. Prepare a list of brownfield sites suitable for residential and commercial development.
Broaden the evidence base to cover all the aspects that a spatial plan should be expected to include such as environmental issues and transport.	Please consider the list of points outlined in the Scope section (3.10).
Prepare a Consultation Engagement Plan to facilitate active participation including residents and the commercial sector.	Please note that major developers such as the Peel Group have expressed a desire to be more fully engaged in the GMSF preparation process. It is important to acknowledge the statutory duty to consult residents and community groups.

Appendix: List of Organisations represented in the consultation

Organisation
Ainscough Strategic Land
Barratt Homes
Barton Wilmore
Barwood Developments (North) and Tatton Estate Management Ltd
Bellway Homes
Blackburn and Darwen Council
Bloor Homes (North West)
Bury Green Party
Canal and River Trust
Cassidy + Ashton
CBRE Global Investors
Cheshire East
Coal Authority
Commercial Estates Group
Corridor Manchester
CPRE
Culcheth and Glazebury Parish Council
Derbyshire County Council
EDF Energy
Emerson Group
English Heritage
Environment Agency
Gladman Developments
GM Cycling Campaign
GMCC (Greater Manchester Cycling Campaign)
GVA
Harris Lamb
Harrow Estates
Harworth Estates
HBF
HCA
High Peak Borough Council
Highways Agency
Himor Group Ltd
Himor Land Ltd
Lancashire County Council
Langtree Carrington Ltd
Manchester Gospel Hall Trust
Manchester University
McCarthy & Stone Retirement Lifestyles Ltd.
Morris Homes
National Trust
Natural England
Nolan Redshaw Ltd Seddon Group Ltd
North West Planning Aid Service
NW Transport Rountable
Persimmon Homes (North West)
Peter Brett Associates LLP
Public Health England Greater Manchester Centre

Red Rose Forest
Redrow Homes
Redrow Homes (Lancashire Division)
Richborough Estates
Rowland Homes
Russell Homes
Steady State Manchester http://steadystatemanchester.net
Strategic Land Group
Taylor Wimpey UK
The Estate of Marques Kingsley Deceased
The Peel Group (Prepared by Turley)
The Woodland Trust
UNITE
United Utilities (Operations)
United Utilities (Property Services)
Wain Homes NW Ltd
Warrington Borough Council
Woodford Neighbourhood Forum
Woodland Trust