

Greater Manchester Spatial Framework Representations on behalf of Taylor Wimpey UK Ltd

Taylor Wimpey

March 2019

LICHFIELDS

60409/01/JG/BOC
17074649v10
17074649v10

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1.0 Introduction

1.1 Following on from our previous representations in 2014, 2015 and 2016, Lichfields is instructed by Taylor Wimpey UK Limited [Taylor Wimpey] to submit representations on the Greater Manchester Spatial Framework [GMSF] Draft for consultation. Although the representations are prepared on behalf of Taylor Wimpey, they represent Lichfields' professional and independent work. The draft GMSF and its associated evidence base was published on 21st January and an 8-week consultation period commenced.

1.2 It is important to state at the outset that Taylor Wimpey welcomes the much-anticipated release of the draft GMSF and the efforts made by the GMCA in producing the substantial document and associated evidence base. We consider that it is imperative that Greater Manchester adopts a Spatial Development Plan which accords with national policy as quickly as possible to ensure the correct levels of housing and economic growth are being catered for across Greater Manchester. Given the growth aspiration of Greater Manchester, a comprehensive and up to date plan is essential to direct and drive investment. Taylor Wimpey consider that a 'Develop Forum' should be established in Greater Manchester as a vehicle for effective engagement and collaboration with the development industry and Taylor Wimpey are willing to take the lead in the establishment of this group in conjunction with GMCA officers.

1.3 Although the current version of the plan forms a Joint Development Plan Document, it is intended that the GMSF will be the first Spatial Development Strategy prepared outside of London, once the necessary Regulations are in place to allow it. This consultation seeks views on the draft GMSF document and the technical evidence base underpinning it to identify the level of housing and employment growth that should be planned for across Greater Manchester over the period 2018 to 2037. The evidence base released by GMCA (January 2019) includes:

- 1 Housing Topic Paper
- 2 Employment Topic Paper
- 3 Green Belt Topic Paper
- 4 Site Selection Topic Paper
- 5 Carbon & Energy Topic Paper
- 6 Natural Environment Topic Paper
- 7 Transport Topic Paper
- 8 Physical Infrastructure Topic Paper
- 9 Social Infrastructure Topic Paper
- 10 Greater Manchester Strategic Flood Risk Management Framework
- 11 Natural Environmental Priority Blue and Green Infrastructure
- 12 Strategic Housing Market Assessment
- 13 Greater Manchester Forecasting Model 2018
- 14 Landscape Character & Sensitivity Assessment
- 15 Greater Manchester Assessment of Proposed Additions to the Green Belt

1.4 These representations are structured to initially set out Taylor Wimpey's 'Key Areas of Concern' with regard to the overall principles contained within the current draft GMSF. Thereafter, it will focus on the draft policies contained in the plan and assess the relevant elements of the evidence base which seek to underpin the soundness of each policy. Taylor Wimpey will also be

submitting separate site-specific representations on its land assets across Greater Manchester in conjunction with these representations. In summary, Taylor Wimpey's sites comprise:

- 1 Gravel Bank Road / Unity Mill, Stockport (Policy GM Allocation 36)
- 2 Broad Lane, Rochdale (Policy GM Allocation 3)
- 3 Littlemoss, Ashton-under-Lyne, Tameside
- 4 Starling Road, Bury
- 5 Plodder Lane, Bolton
- 6 Orrell Road, Wigan
- 7 Jacksons Lane, Stockport
- 8 Wigan Road, Hindley
- 9 Land at High Lane, Stockport
- 10 Ditches Farm, Bolton

1.5 As these representations cover Taylor Wimpey's interests, they focus on housing matters and specifically those elements of the evidence base that have helped to define the housing requirement, its spatial distribution, proposed density and overall approach to housing delivery. As such, we have largely confined our review to the relevant elements of the evidence base that specifically cover housing and associated economic issues.

1.6 The National Planning Policy Framework [The Framework] sets out the planning system should be '*genuinely plan led*'. Furthermore, succinct and up-to-date plans should provide a positive vision for the future of each area [§13]. Finally, policies in local plans and spatial development strategies should be reviewed to assess whether they are up to date '*at least once every five years, and should then be updated as necessary*'. With this in mind, Table 1.1 sets out the year of adoption of the most recent Local Plan for each of the Greater Manchester authorities. This indicates that only 3 of the 10 authorities have had plans adopted since the original Framework was published in March 2012 and emphasises the necessity for the GMSF to progress as quickly as possible.

Table 1.1 Local Plan Status

Local Authority	Adopted Development Plan Document	Year
Bury	Bury Unitary Development Plan	1997
Tameside	Tameside Unitary Development Plan	2004
Salford	City of Salford Unitary Development Plan	2006
Stockport	Stockport Core Strategy	2011
Bolton	Bolton Core Strategy Allocations DPD	2011 2014
Oldham	Oldham Council – Joint Core Strategy and Development Management Policies	2011
Trafford	Trafford Core Strategy	January 2012
Manchester	Manchester Core Strategy	July 2012
Wigan	Wigan Local Plan Core Strategy	2013
Rochdale	Rochdale Core Strategy	2016

1.7 Given the scale of the housing and employment requirement over the plan period and its spatial distribution across Greater Manchester, a bold approach to Green Belt release is unavoidable. The Greater Manchester Green Belt has remained relatively unaltered since its inception in the early 1980s and it has served its function of directing growth to the urban areas and

regenerations many areas across Greater Manchester. However, brownfield land is a finite resource and it is clear from the evidence presented that insufficient capacity exists to deliver the required growth over the Plan period.

- 1.8 We do not under-estimate that scale of the task facing the GMCA in pursuing a Spatial Development Document for all 10 Greater Manchester authorities and we trust that this level of co-operation and far-sightedness on the part of the political leaders of all ten authorities continues through to the adoption of the document and beyond.
- 1.9 Of particular interest to Taylor Wimpey is the housing requirement being promoted within the GMSF. Policy GM-H 1 (Scale of New Housing Development) sets an annual average housing requirement of 10,580 which represents an annual reduction of 7% when compared to the previous draft version of the GMSF. Although, the housing requirement being pursued in the draft GMSF aligns with the Government's standard method, Taylor Wimpey remains concerned that the approach taken to derive this figure is not fully compliant with the policies of the Framework and the apparent disconnect with the aspirations of creating a 'Northern Powerhouse' and represents a divergence away from the requirement for delivering 227,200 homes (11,360 annually) as agreed to in the Housing Deal.
- 1.10 The GMSF represents a once in a generation opportunity to positively plan for the delivery of the required level of housing and employment growth across the sub-region, and provide the tangible backing to the pro-development sentiments expressed in other key documents, notably the Housing Deal, the Northern Powerhouse Strategy, the Long Term Economic Plan for the North West and the City Growth Commission. As it currently stands, there is a clear strategic disconnect between these growth ambitions and the suppressed housing and economic analysis at the heart of the GMSF.

Structure

- 1.11 At the outset, these representations will set out an overview of Taylor Wimpey's key areas of concern with the emerging GMSF and how these should be addressed at the next stage in the process. Thereafter, we address each of the policies in the draft GMSF that are most relevant to Taylor Wimpey. Where appropriate, the comments made are assessed against the test of soundness established by the Framework and the National Planning Practice Guidance [the Practice Guidance].
- 1.12 Detailed representations are made in relation to the following Objective and Policies:
- Objective 1 – Meeting our housing need
 - Objective 2 – Create neighbourhoods of choice
 - Objective 7 – Ensuring that Greater Manchester is more resilient and carbon neutral city-region
 - Spatial Strategy
 - Policy GM-Strat 6 – Northern Areas
 - Policy GM-Strat 7 – M62 North-East Corridor
 - Policy GM-Strat 8 – Wigan-Bolton Growth Corridor
 - Policy GM-Strat 9 – Southern Areas
 - Policy GM-S 1 – Sustainable Development
 - Policy GM-S 2 – Carbon and Energy
 - Policy GM-S 3 – Heat and Energy Networks

- Policy GM-S 4 – Resilience
- Policy GM-H 1 – Scale of New Housing Development
- Policy GM-H 2 – Affordability of New Housing
- Policy GM-H 3 – Type, Size and Design of New Housing
- Policy GM-H 4 – Density of New Housing
- Policy GM Allocation 3 – Kingsway South
- Policy GM Allocation 36 – Gravel Bank Road/Unity Mill
- Policy GM-D 1 – Infrastructure Implementation
- Policy GM-D 2 – Developer Contributions

1.13 Taylor Wimpey reserves the right to make further substantive comments at the next stage of the consultation process. We will also be submitting detailed technical notes which review the robustness of the assumptions with the Stockport's and Bury's 2018 SHLAAA as well as conduct a site by site analysis on the deliverability of a range of the larger sites contained within both SHLAAs (Appendix 1 and Appendix 2).

2.0

Key Areas of Concern

Introduction

2.1

Whilst the principle of preparing a Spatial Development Strategy for Greater Manchester is supported by Taylor Wimpey, we have a number of fundamental concerns regarding the draft for consultation and the evidence base underpinning it. The key areas of concerns are summarised below and will be scoped out in more detail throughout these representations:

- 1 **10,578 dpa is insufficient to meet housing needs:** the 10,578 dpa target derived from the standard methodology represents the minimum starting point. The Practice Guide¹ states that an uplift should be applied where funding is in place to promote and facilitate growth (e.g. GM's £68m housing deal package that, if agreed, would commit GMCA to delivering 227,200 homes over the next 20 years as per the previous GMSF draft², a figure 7% above the current annual target). We are aware that MHCLG has written to the GMCA and has raised concerns about deviating below the agreed housing requirement. MHCLG has threatened to withdraw the housing package including the £50m fund to prepare brownfield land for development.

Uplifts to the Local Housing Need [LHN] would also be appropriate where strategic infrastructure improvements are planned (HS2 being a clear example) and where affordable housing requirements cannot otherwise be met. The Practice Guide also states that the need for particular sizes, types and tenures of homes as well as the needs of particular groups should be reflected in the housing requirement.

- 2 **Phasing concerns:** The GMSF proposes to lower targets over the first 5 years to just 9,200 dpa (13% below the LHN). This conflicts with the Government's aspiration to frontload housing delivery by factoring in a buffer of additional deliverable sites, brought forward from later in the plan period [§73]. Furthermore, it is unclear why certain districts with few allocations, such as Bolton, have much lower targets in the first 5 years of the plan, whilst others with large scale allocations and complex site delivery issues (i.e. Salford) have no back-loading of housing targets.
- 3 **Unrealistic density targets:** Policy GM-H-4 of the GMSF proposes stringent housing densities to be applied reflecting the relative accessibility of sites. This approach is geared towards delivering high density apartment schemes in Manchester City and Salford and reducing the need for Green Belt release. The Policy is overly prescriptive and will not meet the needs of the markets they are intended to serve. The GMSF provides no evidence that the high-density housing will meet the needs of all households, and certainly not families with children who will require a range of services and community facilities, such as primary schools, which are largely unavailable in the City Centre.
- 4 **No formal Green Belt Review:** Despite proposing 2,419 ha of Green Belt land for release, the GMSF has relied upon the findings of a Green Belt Assessment³ rather than a Review. The GM Green Belt Assessment accepts that it focuses on the relative performance of the Green Belt and does not advise on the suitability or potential of land for development, nor whether exceptional circumstances exist relating to the alteration or review of Green Belt boundaries. This should be the preserve of a Green Belt Review, which has not been prepared to support the proposed Green Belt allocations within this version of the Plan.

¹ 2a-010-20180913

² GMCA (5th June 2018): Planning, Housing and Environment Overview and Scrutiny Committee, Greater Manchester Housing Package

³ LUC (July 2016): Greater Manchester Green Belt Assessment

Furthermore, in accordance with §139 of the Framework, the GMSF should identify areas of safeguarded land in order to meet longer term needs stretching well beyond 2037.

- 5 **Greater Manchester is not a single Housing Market Area [HMA]:** The GMCA assumes that a single HMA operates across the whole of GM, which justifies a redistribution of the overall housing allocation towards the central and northern districts and away from the more affluent south [§7.8]. This assumption (that a family seeking to move to Bramhall in Stockport would be equally happy to move to Wigan) is a poor reflection of how the GM market actually operates, as reflected in clear discrepancies in house prices (GMSF Figure 7) and affordability ratios. It also conflicts with the finding in the 2008 Greater Manchester Strategic Housing Market Assessment [SHMA] that 4 HMAs were in operation across GM. Detailed reasoning and evidence to justify the claimed position that Greater Manchester operates as one HMA has not been provided to justify the divergence away from the previously claimed position.
- 6 **No Site Selection Methodology:** §11.6 of the GMSF 2019 states that sites have been identified to reflect the overall spatial approach "with the aim of making the most of existing locations and assets whilst providing opportunities across Greater Manchester that help address current disparities". However, the list of potential allocations is arbitrary and does not follow a logical methodology. Taylor Wimpey has serious concerns with the site selection process and consider that it is not robust and will not stand up to scrutiny at examination.
- 7 **Deliverability concerns:** The GMSF's strategy of focusing development on high-density Previously Developed Land [PDL] sites in central locations, and focusing a handful of large Green Belt allocations towards the more deprived northern districts, increases the risk that sites will not come forward as planned. Complex, high density PDL sites tend to have higher exceptional upfront costs and longer lead-in times, whilst there has been a clear glut in recent years of apartment blocks for young professionals and students which may or may not continue into the future. Many of the draft allocations are located in weaker market areas, resulting in viability and delivery concerns, whilst we are aware of other allocated sites that have development constraints that may prevent them from coming forward at all.
- 8 **Failure to provide an appropriate mix, size and type of housing:** The GMSF focuses on delivering high density homes (43% in Manchester City and Salford), many of which will comprise 1 / 2-bed apartments targeting a niche market and not bearing in mind the actual needs of Greater Manchester. The NPPF requires that plans assess the size, type and tenure of housing needed for different groups in the community [§61] - the GMCA has not done this. The GM Housing Survey (2017)⁴ suggested that 80% of 2,000 local respondents want to own a home in a suburb; 84% seeking a home with a private garden; and just 8% want to live in an apartment in the City. This GMSF's strategy approach is therefore inconsistent with the evidence. Finally, limited provision is made in the GMSF to meet the needs for specialist housing including elderly provision and student accommodation.
- 9 **Ignoring the housing affordability crisis:** the GMSF fails to take affordability issues into account. It notes that if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs [§7.4]. However, the GMSF ignores the point by cutting housing targets in the most unaffordable parts of GM - Stockport and Trafford (with the latter experiencing house prices 8.9-times earnings).

⁴ Housing the Powerhouse (2017): Ipsos MORI North surveyed 2,000 adults (aged 18+) in the 01 local authority areas of Greater Manchester between 26th May and 4th June 2017

- 10 **Affordable housing:** There is no analysis of affordable housing needs at all in the GMSF, without which it is impossible to ascertain whether a further uplift to the LHN is required. The 'aim' to deliver 50,000 affordable homes (2,632 annually) is more than double the 1,211 affordable homes currently being delivered across GM. This appears very challenging, given that the supply comprises predominantly complex PDL sites or sites in weaker HMAs, hence viability pressures are likely to restrict social housing delivery.
- 11 **Consistency of Evidence Base:** Taylor Wimpey is disappointed with the inconsistent nature of the evidence base which has been released to underpin the GMSF. In particular, the SHLAAs produced by the 10 authorities do not follow a consistent approach or methodology. The conclusions of each SHLAA inform the quantum of brownfield land developable over the plan period and consequently informs the level of Green Belt land required to meet the housing and employment land needs of Greater Manchester. Artificially inflating the claimed supply to suppress the quantum of Green Belt land required and applying an inconsistent approach to all SHLAAs is not robust and could result in the GMSF being found unsound at examination. There seems to be a focus across the city-region solely on the delivery of 'units' at the expense of a strategy that achieves the right housing need figure, at the right locations to create quality family homes and communities, whilst addressing affordability issues across the city region. A more realistic and balanced approach is required, that brings forward additional suitable Green Belt sites forward for development, with place making at its heart, to the benefit of generations to come.

3.0 **Chapter One: Introduction**

Question 1: What type of respondent are you?

3.1 These representations are prepared on behalf of Taylor Wimpey UK Limited [Taylor Wimpey]. Taylor Wimpey are a national housebuilder with a number of land interests across Greater Manchester.

Question 2: Contact Details

3.2 These representations have been prepared on behalf of Taylor Wimpey by Lichfields. The appropriate contact details for the person responsible for these representations is Brian O'Connor, Associate Director, Lichfields, 6th Floor, Ship Canal House, 98 King Street, Manchester, M2 4WU, Brian.oconnor@lichfields.uk

Question 3: Are you over the age of 13?

3.3 Yes, we can confirm that we are over the age of 13.

Question 4: If you are submitting a response on behalf of an organisation or group, please also give use their details.

3.4 We are submitting these representations on behalf of Taylor Wimpey and the appropriate contact details are Kate McClean, Senior Strategic Land and Planning Manager, Washington House, Birchwood, WA3 6GR, Kate.McClean@Taylorwimpey.com

Question 5: We would like to be able to publish responses after this consultation closes. Are you happy for us to do this?

3.5 Yes, we would be happy for these representations to be published following the closure of the consultation. However, we would like the specific contact details at Lichfields and Taylor Wimpey to be redacted but we are happy for the relevant Councils or GMCA to contact us about the content of these representations.

Question 6: Do you agree that we need a plan for jobs and homes in Greater Manchester?

3.6 Yes, Taylor Wimpey strongly agrees that Greater Manchester needs a plan for jobs and homes across the conurbation as required by national planning policy. A number of authorities in Greater Manchester are relying on local plans which were prepared a number of years ago and are no longer wholly consistent with national policy. Furthermore, if Greater Manchester is going to realise its ambition of being the engine of the Northern Powerhouse, it is imperative that a positively prepared and aspirational plan for the delivery of jobs and homes is adopted as soon as possible.

Question 7: Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

3.7 Taylor Wimpey agrees that land is a finite resource and we should be planning to make the most effective and efficient use of that land over the plan period. However, where exceptional circumstances are present, Green Belt land needs to be released to accommodate future growth requirements. The lack of sufficient brownfield land in an authority to meet the needs over the plan period is not an appropriate reason to restrict growth. Furthermore, it is important that

local authorities and the GMCA adopt appropriate density aspirations particularly for residential developments and do not seek to overestimate the delivery capacity of the allocations within the GMSF.

Question 8: Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

- 3.8 Considering firstly green spaces within the urban area rather than agricultural land on the periphery of the urban area, we recognise that green spaces within the urban area are important for creating a sense of place and acting as recreational areas to meet people's needs. Furthermore, protecting green spaces within the urban area improve the environmental quality of an area, including air quality, and improves an areas biodiversity potential. The loss of existing green spaces in the urban area for development is not appropriate or meet good planning principles purely to reduce the quantum of Green Belt land in sustainable locations which is required to meet development needs.
- 3.9 However, if this question is referring to countryside outwith settlement boundaries, Taylor Wimpey is of the opinion that it is imperative that an appropriate quantum of the most sustainable sites needs to be released and allocated for development. The majority of land on the urban fringe is used for intensive agricultural purposes, is not publicly accessible and is not of particular environment quality. Although the majority of land on the edge of settlements across the city-region is designated as Green Belt, this designation does not automatically imply that the land is of particular environmental or landscape quality.

Question 9: Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?

- 3.10 As set out in the answer to Question 8, Taylor Wimpey considers that the protection of green spaces within the urban area is very important for a number of reasons. In terms of considering all other land within the urban areas of the conurbation, each of the 10 local authorities have prepared detailed housing land availability assessments to underpin the GMSF. There continues to be a shortage of land overall to meet the needs over the plan period.
- 3.11 Therefore, appropriate levels of agricultural land in sustainable locations and on the periphery of the urban area, where this has limited public accessibility should be considered for development. Where this land is designated Green Belt exceptional circumstances are required to be present for this land to be considered to be used. It is important to point out at the outset that a Green Belt designation is simply a planning designation designed to restrict the uncontrolled sprawl of large urban areas and does not directly correlate with environmental or landscape quality.

Question 10: Is the approach that we have outlined in the plan reasonable?

- 3.12 No. Taylor Wimpey welcomes the release of the draft GMSF and commends the efforts of the combined authority is preparing the documents. Although supporting a number of the proposed housing allocations within the plan, Taylor Wimpey has a number of serious concerns in relation to the plan and the associated evidence base which will be covered in more detail throughout the course of these representations. As currently drafted, we do not consider the GMSF to be sound in terms of paragraphs 16 a), b) and c), 20 a) and 35 a), b), c) and d) or in compliance with the statutory duty to prepare the plan with the objective of achieving sustainable development.

4.0 Chapter Three: Our Vision

Question 12: Do you agree with the Strategic Objectives?

4.1 The GMSF sets out 9 Strategic Objectives which the strategy will seek to deliver over plan period. The Objectives are:

- 1 Meet our housing need;
- 2 Create neighbourhoods of choice;
- 3 Ensure a thriving and productive economy in all part 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 Ensure 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.

4.2 Taylor Wimpey is pleased to see that meeting our housing need is included as a Strategic Objective of the GMSF. To achieve this objective, the plan sets out that it will seek to: increase net additional dwellings; increase the number of affordable homes; develop a Greater Manchester definition for affordable housing and provide a diverse mix of housing.

4.3 Although Taylor Wimpey supports the aspirations of Objective 1, they have considerable concerns that the content of this version of GMSF will fail to meet the objectives as insufficient land is identified to meet the housing requirements over the plan period and the sites identified to meet the housing requirement are focused purely on achieving the overall number and bears no relation to the actual need in terms of housing mix. The GMSF is relying disproportionately on the delivery of high density, small apartments in Manchester and Salford, which will only cater for a small proportion of the overall need.

4.4 It would appear that little thought has been given to place making and creating places in which the people of Greater Manchester actually want to live. One element of Objective 1 is to increase the delivery of affordable housing but the reliance on the delivery of small apartment schemes in Salford and Manchester is unlikely to result in significant increases in the levels of affordable housing actually being delivered.

4.5 In 2016 and 2017, Manchester City Council approved 61 large residential developments with a capacity to deliver 14,667 apartments⁵ and houses but none of the dwellings met the Government's definition of affordable despite the City Council's policy requirement to deliver 20% affordable homes (Policy H8 Affordable Housing). The majority of affordable housing being delivered in Greater Manchester is on schemes in suburban locations and there is a risk that Greater Manchester's objective to deliver 50,000 affordable homes across the plan period will not be achieved by placing an overreliance on city centre apartment schemes.

4.6 Taylor Wimpey is unsure why Objective 1 is seeking to develop a Greater Manchester specific definition of affordable housing and the implications that this may have on deliverability and viability. As the GMSF will come forward as a Spatial Development Strategy, it needs to accord with the principles of the Framework. Annex 2 of the Framework sets out a national definition

⁵ <https://www.theguardian.com/cities/2018/mar/06/the-0-city-how-manchester-developers-dodge-affordable-housing>

of affordable housing and as such, a Greater Manchester specific definition is inappropriate and unnecessary.

- 4.7 Taylor Wimpey has a number of other concerns in relation to housing specific matters which will be addressed further in a later section of this representation.
- 4.8 In terms of other Strategic Objectives of the GMSF, Objective 2 sets out that new homes should be focused within 800m of public transport hubs. Taylor Wimpey supports the delivery of homes in close proximity to public transport hubs but the GMSF should also consider the potential for additional train and tram stations and public transport hubs to be created as part of large scale strategic allocations.
- 4.9 Taylor Wimpey also considers that Objective 2 should focus on design and place making. To create neighbourhoods of choice, high quality design which creates a strong sense of place and an area people aspire to live in is required. However, this objective is silent on these matters. Taylor Wimpey is concerned that, when it comes to housing, the GMSF is focused on delivering high density residential development on brownfield land rather than delivering homes where and in which a wide range of people want to live. The focus is on delivering the overall housing requirement rather than delivering high quality, well designed homes and neighbourhoods that people want to live in in the right locations.
- 4.10 Finally, Objective 7 seeks to promote carbon neutrality of all new development by 2028. Taylor Wimpey is fully supportive of the sustainability agenda and understands its importance in minimising climate change. However, achieving carbon neutrality may have implications for developability of sites, in particular their viability. As such, a detailed viability assessment including the implications of securing carbon neutrality needs to be prepared to underpin the GMSF and demonstrate that the objective and specific planning policies relating to sustainability initiatives do not undermine the viability of development.

5.0

Chapter Four: Our Strategy

Question 13: Do you agree with the Spatial Strategy?

5.1

The GMSF seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth and prosperity. The overall strategy seeks to focus growth in the core and northern areas *'to boost significantly the competitiveness of the northern parts of Greater Manchester'* [GMSF §4.19].

5.2

Since the preparation of the GMSF commenced, Taylor Wimpey has delivered a significant number of homes on brownfield sites across the north of Manchester. However, the supply of brownfield land in these authorities is finite and Taylor Wimpey considers that there is insufficient land to cater for the overall housing requirement without releasing Green Belt land for development. Aside from the lack of land to meet the housing need, there are a number of other exceptional circumstances to justify the release of Green Belt land including market desire for houses rather than apartments, the Northern Powerhouse growth agenda, the need to provide significant levels of affordable housing, reversing recent affordability trends, providing aspirational and professional housing as well as ensuring that areas outside of the city region (i.e. Cheshire) do not become commuter belts for Manchester. Taylor Wimpey considers that the strategy will need to deliver homes on brownfield and greenfield sites over the plan period if the city-region is to meet their overall housing requirement and spatial strategy.

5.3

In principle, Taylor Wimpey agrees with the overarching principle of trying to rebalance the competitiveness of the area but considers that the GMSF should not be planning for less development in the southern areas as this will affect the competitiveness of the Greater Manchester and result in many economic and social issues such as increased affordability ratios, homelessness, overcrowding and concealed households. Taylor Wimpey considers that a more appropriate objective for achieving the overall spatial strategy would be for the southern area to meet its own need whilst uplifting the housing and employment requirements for the core and northern areas to drive economic growth and competitiveness. The overall strategy should also focus on delivering developments in the northern area which are attractive to the market, are of high quality and create places in which people aspire to live and work. This would be a more appropriate catalyst for boosting the competitiveness of the north.

5.4

The GMSF [§4.5] sets out that over recent years, growth has been concentrated in the three local authority areas of Salford, Manchester and Trafford and that Stockport is projected to have the next highest growth rates, *'further consolidating the concentration of growth in central and southern districts in the city region'*. Taylor Wimpey disagrees with this assertion as Stockport and Trafford have both struggled to meet their housing requirements over the past 5 monitoring years as set out in Table 5.1. Over the same period, Bolton and Wigan have consistently delivered significantly more dwellings than Trafford and the GMSF assertion on growth over the past number of years is incorrect, from a housing delivery perspective at least.

Table 5.1 Housing Requirement v Completions (Trafford & Stockport)

Year	Trafford		Stockport	
	Delivery	Requirement	Delivery	Requirement
2013/14	145	794	374	495
2014/15	379	794	464	495
2015/16	361	760	321	495
2016/17	330	760	664	495
2017/18	468	760	743	495

Source: CLG Live Table 123 & Stockport SHLAA 2018

- 5.5 Although the Strategy sets out that it seeks to boost the competitiveness of the north, the housing requirements with the GMSF do not reflect this aspiration. Bolton, Bury and Tameside's housing requirement as set out in Table 7.1 of the GMSF fall below the minimum housing requirement established using the standard method for calculating housing requirement. Therefore, although the overall spatial strategy sets out that it is seeking to redress the economic balance of Greater Manchester, from a housing delivery perspective, it does not do this. Taylor Wimpey is of the opinion that all three authority areas need to be at least meeting their own minimum housing requirement to achieve the overall spatial strategy of boosting the competitiveness of the north.
- 5.6 The GMSF [§4.12] sets out that it will seek to maximise the *'reuse of previously-developed land and delivering higher densities in the most accessible locations will together help to reduce the total amount of land required for new buildings and hence minimise the need for development of greenfield sites'*. Taylor Wimpey is a strong advocate of delivering sites on previously developed land and has delivered a significant number of new homes across Greater Manchester on brownfield sites in recent years. However, it is imperative that the GMSF does not seek to artificially increase densities on sites to unrealistic and undeliverable levels purely to reduce the necessity to allocate sites on undeveloped land including land in the Green Belt. Furthermore, the GMSF needs to place a greater degree of importance on place making and delivering communities that the people of Greater Manchester want to live in. The current overreliance on apartment schemes in Salford and Manchester will not create communities in which people want to and aspire to live.
- 5.7 In conclusion, Taylor Wimpey would advocate that the overall spatial strategy is revised to ensure the southern areas meet their own housing need.

Question 19: Do you agree with the proposed policy on Northern Areas?

- 5.8 Policy GM-Strat 6 is seeking to significantly increase the economic competitiveness of the northern areas of the conurbation with a focus on urban regeneration complemented by selective release of Green Belt sites in key locations.
- 5.9 As set out in Taylor Wimpey's response to Q.13, we have concerns that the proposed strategy will not significantly increase the competitiveness of the northern area as envisaged particularly from a housing perspective. Bury, Bolton and Tameside are not proposed to meet their minimum housing requirement as established using the standardised method and instead the GMSF relies on meeting broader needs by promoting housing in the form of apartments in Manchester City Centre and Salford.
- 5.10 Although the policy sets out that selective Green Belt releases have been identified in the area, there are no Green Belt releases at all being proposed in Bolton. The Council consider that they have a sufficient supply of land within the urban area to meet their needs over the plan period. However, Taylor Wimpey strongly disagrees with the assertion and considers that the Council needs to at least allocate land currently identified as Other Protected Open Land for redevelopment.
- 5.11 Furthermore, there are a number of Green Belt sites in Tameside and Bury which would form logical sites for residential development in planning policy terms and should be identified as allocations to ensure Bury and Tameside meet their housing requirement as established using the standard method. Taylor Wimpey considers that the previously identified sites at Starling Road, Bury and Littlemoss, Tameside should be reintroduced as draft allocations to meet both authority's housing needs. Site specific representations have been prepared for both sites to demonstrate that they no longer fulfil the purpose of including land in the Green Belt and both

sites are deliverable in the first 5 years post adoption of the GMSF. These site-specific representations accompany this Report.

- 5.12 §4.48 of the GMSF sets out the importance of increasing the attractiveness of the northern areas to a wider range of people. Taylor Wimpey is of the opinion that one of the key mechanisms for increasing the attractiveness of an area and increasing the number of higher income households is by providing suitable and appropriate high-quality family homes in well-designed neighbourhoods. Delivering higher density dwellings in urban areas will meet a specific need but is unlikely to attract higher income households to the north of the conurbation. As such, the GMSF will need to allocate an appropriate amount of land for family homes in appropriate locations to achieve its ambition of increasing the attractiveness of the area, realising its true growth potential and maximising the unique competitive advantages Manchester has such as the Airport City development and HS2 linkages.

Question 20: Do you agree with the proposed policy on M62 North East Corridor?

- 5.13 Taylor Wimpey supports the proposed policy for the M62 North-East Corridor development. In particular, Taylor Wimpey is supportive of the Kingsway South site and is of the opinion that in principle, delivering a mixed use residential and employment development in this location, brought forward in a comprehensive manner promotes sustainable development. Furthermore, delivering the necessary infrastructure requirements in an inclusive and comprehensive manner should ensure that all developments along the M62 North East Corridor pay proportionately for the requirement improvements.

Question 21: Do you agree with the proposed policy on the Wigan-Bolton Growth Corridor?

- 5.14 Taylor Wimpey generally supports the principle of delivering the Wigan-Bolton Growth corridor but is of the opinion that the proposed policy is missing a key opportunity. Taylor Wimpey considers that the site at J26/Orell Road should not have been deleted from this version of the GMSF. The site forms a very logical and sustainable mixed-use development and can deliver much needed infrastructure for the wider area.
- 5.15 Taylor Wimpey advocates that the Council's reconsiders its position and includes the site at J26/Orell Road Wigan within the next version of the GMSF. It is considered that the site could deliver at least 150,000 sq.m logistics development in conjunction with 300 residential dwellings and a new link road in accordance with a comprehensive vision for the site.

Question 22: Do you agree with the proposed policy on Southern Areas?

- 5.16 As set out in Taylor Wimpey's response to Q13, the proposed strategy does not protect and enhance the economic competitiveness of the southern areas and additional selective Green Belt releases are required for housing provision in particular.
- 5.17 As acknowledged by the GMSF [§4.58], there are significant issues of housing affordability in the southern areas of the conurbation and restricting the delivery of housing below the minimum housing requirement will not assist in tackling these serious affordability issues. Furthermore, Stockport, with its overreliance on delivery as part of the Town Centre Living Allowance and parts of Trafford and southern Manchester are relying on high density apartment schemes coming forward to meet their housing need. This will meet a specific element of need but is unlikely to address the significant affordability issues in the area.

- 5.18 Although the accompanying text sets out that the GMSF is seeking to sustain the economic competitiveness of the southern area, Taylor Wimpey considers that not meeting the minimum housing needs of Trafford and Stockport will affect these areas ability to sustain its economic competitiveness.

6.0 **Chapter Five: A Sustainable and Resilient Greater Manchester**

Question 28: Do you agree with the proposed policy on Sustainable Development?

- 6.1 Tylor Wimpey supports in principle the GMSF's stated objective of promoting sustainable development and as a responsible housebuilder strives to create high quality neighbourhoods which adhere to the principles of sustainable development.
- 6.2 The draft Policy GM-S 1 (Sustainable Development) also sets out the preference for using previously-developed (brownfield) land to meet development needs. Taylor Wimpey has a proven track record of delivering developments across Greater Manchester and beyond on previously developed sites. Taylor Wimpey is committed to continue delivering high quality residential developments on previously developed sites in Greater Manchester but considers that the claimed supply, and particularly some of the densities being promoted in the GMSF, are unrealistic and unachievable. The overreliance on high density schemes will affect the economic competitiveness of the city region and will not deliver the housing types needed to provide the range and choice required by NPPF policy.
- 6.3 The creation of high density apartment schemes and the redevelopment of the majority of undeveloped spaces within the city region with limited greenspace and facilities will also affect the social wellbeing of future residents. It is important to point out that a Green Belt designation does not automatically mean that land is of a high environmental quality and the GMSF needs to focus more on the delivery of economic development and creation of high quality sustainable place in which people aspire to live in.
- 6.4 Although the redevelopment of previously developed land is important, it should not be considered in isolation and delivering the right type and mix of high quality housing in appropriate settings is also important in delivering the economic, social and environmental objectives of sustainable development.

Question 29: Do you agree with the proposed policy on Carbon and Energy?

- 6.5 As a responsible housebuilder, Taylor Wimpey realises the necessity to reduce greenhouse gas emissions and is constantly evolving its design principles and house types to minimise waste and promote sustainable development. Policy GM-S 2 (Carbon and Energy) sets out that the GMSF will seek to deliver a carbon neutral Manchester no later than 2038 which will be achieved through the promotion of a number of measures. The measures mentioned in the Policy include: new dwellings should seek a 19% carbon reduction against Part L of the 2013 Building Regulations; incorporate adequate electric vehicle charging points; connect to renewable/low carbon heat and energy networks; and, achieve a minimum 20% reduction in carbon emissions through the use of on site or nearby renewable and/or low carbon technologies.
- 6.6 Taylor Wimpey supports the principle of delivering a carbon neutral Greater Manchester but the GMSF must fully consider the viability implications of requiring developments to adhere to these principles. At present, the GMSF has not prepared a Viability Assessment to consider the implications of the requirements as set out in Policy GM-S 2. Prior to the release of the Submission Version of the GMSF, it is imperative that a detailed Viability Appraisal is prepared which considers the viability implications of all policy requirements of the GMSF. Without this

evidence, it will be impossible to justify that the GMSF is effective and consistent with national planning policy at Examination and that these requirements in conjunction with site specific infrastructure requirements do not undermine the deliverability of each of the proposed allocations and other windfall sites which the Plan is relying upon to achieve its overarching strategy and objectives.

- 6.7 Taylor Wimpey requests that the viability implications of requiring developments to deliver carbon neutrality no later than 2038 are considered in conjunction with infrastructure and other policy requirements are fully considered by appropriate evidence in the next iteration of the GMSF.

Question 30: Do you agree with the proposed policy on Heat and Energy Networks?

- 6.8 Policy GM-S 3 (Heat and Energy Networks) sets out that within the identified Heat and Energy Network Opportunity Areas there will be a requirement that new residential developments over 10 dwellings should evaluate the viability of connections to an existing or planned heat/energy network or install a site wide network solution.
- 6.9 Taylor Wimpey has no objection to this Policy in principle and understands the importance of reducing carbon emissions in the future. However, it is imperative that the cost implications are considered at the Plan making stage and this requirement coupled with all other policy requirements are considered comprehensively in a robust Viability Appraisal. It is imperative that this Viability Assessment is prepared prior to the next iteration of the GMSF being released and robustly demonstrates that the requirements of Policy GM-S 3 do not undermine the viability of the proposed developments over the plan period.

Question 31: Do you agree with the proposed policy on Resilience?

- 6.10 Policy GM-S 4 (Resilience) sets out that development in Greater Manchester will be managed so as to increase considerably the capacity of its citizens, communities, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges.
- 6.11 The draft policy sets out a number of key measures which include '*maintaining a very high level of economic diversity across Greater Manchester*'. Taylor Wimpey supports this measure and ensuring sufficient and suitable employment land of various sizes and locations is a key element of achieving this ambition. However, Taylor Wimpey is concerned about the quantum of employment land which is being proposed for residential development over the plan period. Having reviewed the Bury and Stockport SHLAA in detail, a significant amount of both authorities claimed supply over the coming years is derived from existing employment sites. A significant number of these sites are still in employment uses and contribute towards the economic diversity of Greater Manchester. Taylor Wimpey considers that the redevelopment of a significant number of existing employment sites which are in continuing employment use will not achieve the GMSF's stated ambition.
- 6.12 The draft policy also sets out an ambition to deliver '*at least 50,000 new affordable homes over the period 2018-2037*'. Taylor Wimpey considers that this is an ambitious target but understands the necessity to deliver a significant proportion of affordable homes over the plan period. However, although the GMSF is planning to deliver a minimum of 201,000 net additional dwellings over the plan period, a significant proportion (43%) of these dwellings are being proposed in high density apartment schemes in Salford and Manchester. Salford and Manchester currently have poor track records of delivering affordable dwellings on apartment

schemes and have secured very few affordable properties over the past number of years through developer contributions.

- 6.13 For example, in 2016 and 2017, Manchester City Council approved 61 large residential developments with a capacity to deliver 14,667 apartments⁶ and houses but none of the dwellings met the Government's definition of affordable despite the City Council's policy requirement to deliver 20% affordable (Policy H8 Affordable Housing). Similarly, during 2017/18, Salford City Council delivered 1,479 dwellings net but only 16 affordable homes were delivered through Section 106 with an additional £135,000 paid to the Council as a commuted sum for the delivery of off-site affordable housing. Despite significant delivery of dwellings in Salford and Manchester in recent years, the quantum of affordable homes being delivered falls significantly short of the average 25% requirement being advocated in the GMSF.
- 6.14 Taylor Wimpey considers that the current GMSF strategy of prioritising the delivery of homes on brownfield sites in high density developments in Manchester and Salford will not achieve the stated ambition of securing 50,000 affordable dwellings over the plan period and consider that additional Green Belt release across the city region is the only means of delivering the high level of affordable housing required.

⁶ <https://www.theguardian.com/cities/2018/mar/06/the-0-city-how-manchester-developers-dodge-affordable-housing>

7.0 **Chapter Seven: Homes for Greater Manchester**

Question 41: Do you agree with the proposed policy on the Scale of New Housing Development?

7.1 The GMSF has identified a local housing need of 200,980 dwellings over the period 2018-2037, equivalent to 10,578 dwellings per annum [dpa], which equates to the baseline demographic need generated by the 2014-based Sub-National Household Projections [SNHP] uplifted to reflect worsening affordability ratios in accordance with the MHCLG's standard methodology. Having calculated this for each individual district, the GMCA has then redistributed the housing target on the basis of policy and supply considerations.

7.2 Whilst welcoming the use of the 2014-based SNHP rather than the 2016-based SNHP as the initial starting point for defining housing need (and the willingness to at least explore Green Belt release to meet some of this need), Taylor Wimpey remains extremely concerned that the level of housing identified underplays the true level of need required to overcome years of under-provision. We are also particularly concerned with how the GMCA has redistributed the housing need across the sub-region, whilst it is unclear how the delivery of 10,578 dpa will help Greater Manchester to be the driving force in the Northern Powerhouse over the next 20 years or more.

In our representations to the 2016 Draft GMSF consultation we raised similar issues that the document was pursuing very conservative levels of housing growth. We were concerned that without a pro-development GMSF, Greater Manchester would be unable to act as the 'driving force' behind the Northern Powerhouse. However, the latest version of the GMSF scales back the level of housing and economic development even further, making it even less likely that Greater Manchester (and by extension the North in general) can achieve its full potential.

The GMSF Approach Taken to Calculating Local Housing Need (LHN)

7.3 The NPPF states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a Local Housing Need [LHN] assessment, conducted using the standard method as set out in the PPG, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.

7.4 This involves taking an average of the most recent household projections (the 2016-based SNHP – subject to what is set out below), and calculating the projected average annual household growth over a 10-year period (2019-2029). An adjustment is then applied based on the affordability of the area, using the most recent median workplace-based affordability ratios. A cap may then be applied which limits the increase in the minimum annual housing need figure for an individual local authority, depending on the current status of relevant strategic policies for housing and the scale of any increase.

7.5 On 26th October 2018, the Government launched a *Technical Consultation on updates to national planning policy and guidance*, which represents an important reinforcement of the direction of change the Government is following to deliver more homes. This document proposed a revision to the standard method calculation in light of the impact the 2016-based household projections were having on the calculation. The 2018- based projections reduce the projected rate of household formation compared to the previous projections by 53,000 a year between 2018 and 2028.

7.6 On 19th February the Government issued its response to the Technical Consultation, which concluded that:

“The Government continues to think that the 2016- based household projections should not be used as a reason to justify lower housing need. We understand respondents’ concerns about not using the latest evidence, but for the reasons set out in the consultation document we consider the consultation proposals to be the most appropriate approach in the short-term. We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method.” [pages 7-8]

7.7 Although at the time of writing the PPG has yet to be updated to reflect this shift in Government approach, clearly the GMCA is correct in using the 2014-based SNHP to underpin its LHN calculation:

“The standard Government methodology takes projected population and household growth and applies an affordability uplift to provide a local housing need figure. The consultation methodology proposed the use of 2014-based demographic projections. These projections suggest that the population of Greater Manchester will grow by over a quarter of a million people between 2018-2037. This increase is driven primarily by natural change, with an ageing population and the number of births significantly exceeding the numbers of deaths. Over the same period, the 2014-based household projections indicate that average household size is expected to continue to decline, meaning that more homes are needed to accommodate the same number of people.” [GMSF: §7.6]

7.8 The resultant calculation is summarised in Table 7.1.

Table 7.1 GMCA’s Calculation of Local Housing Need Across Greater Manchester

District	2014-based SNHP Annual Average	Affordability Ratio / Uplift	LHN	Adjusted Housing Target	Difference
Bolton	734	5.23 (8%)	791	726	-65 (-8.2%)
Bury	526	6.51 (16%)	608	498	-110 (-18.1%)
Manchester	2,383	5.35 (8%)	2,584	2,870	286 (+11.1%)
Oldham	653	5.55 (10%)	716	752	36 (+5.0%)
Rochdale	467	5.62 (10%)	514	640	126 (+24.5%)
Salford	1,246	5.63 (10%)	1,372	1,720	348 (+25.4%)
Stockport	889	7.56 (22%)	1,087	764	-323 (-29.7%)
Tameside	577	5.54 (10%)	632	466	-166 (-26.3%)
Trafford	1,020	8.94 (31%)	1,335	1,015	-320 (-24.0%)
Wigan	871	5.34 (8%)	944	1,126	182 (+19.3%)
Greater Manchester	9,365	-	10,583	10,578	-5 (0.0%)

Source: GMCA (2019): GMSF revised Draft 2019 / GMCA (2019): Greater Manchester Strategic Housing Market Assessment Table 3.2

7.9 The GMCA has then redistributed the LHN towards the central and northern districts of Greater Manchester:

“Manchester and Salford will continue to be an appropriate location for the highest levels of new housing due to their central location, good public transport connections, proximity to the main concentrations of employment and leisure opportunities, and ability to deliver very high density developments. Supporting higher levels of new housing in the northern districts will

assist in achieving a more balanced pattern of growth across Greater Manchester and a better distribution of skilled workers to support local economies, helping to reduce disparities. The proposed distribution of housing development also reflects the availability of suitable sites in each of the districts.” [7.9]

- 7.10 Taylor Wimpey agrees that in utilising the 2014-based SNHP, the current standard method housing figure for Greater Manchester would calculate at around 10,580 dpa (recognising that the GMCA’s analysis was undertaken in 2018 and not 2019). However, this figure represents only the starting point for identifying housing need; the GMCA has had no regard to other issues that could justify a higher figure than that currently proposed for the GMSF as set out in the PPG, to reflect (for example) changing economic circumstances or future demographic behaviour which could have an impact on the LHN.

Consideration of a different figure to the LHN generated by the standard method

- 7.11 The NPPF is clear that the standard methodology is the default approach for calculating local housing need unless there are “*exceptional circumstances*” which could justify an alternative approach which also reflects current and future demographic trends and market signals [§60].

- 7.12 The Government is clear that the figure derived by the LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections:

“Local housing need does not represent a mandatory target – it is simply a starting point for planning, and local authorities may either choose to plan in excess of this or to conclude that they are not able to meet all housing need within their boundaries, for example due to constraints such as protected designations and Green Belt, or whether that need is better met elsewhere. This means there is flexibility for local authorities to manage movements in local housing need locally.”⁷

- 7.13 The PPG states that once a strategic policy-making authority has established a housing need figure, it will need to consider the extent to which it can be met, which presumably factors in the aforementioned policy considerations.

- 7.14 However, the 2018 PPG also sets out that there will be circumstances when a higher figure than that generated by the standard method might be considered. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

- 7.15 Circumstances which might justify an uplift include⁸:

- *where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);*
- *where strategic infrastructure improvements are planned that would support new homes;*
- *where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;*

⁷ MHCLG (October 2018): *Technical consultation on updates to national planning policy and guidance*, page 13

⁸ PPG Reference ID: 2a-010-20180913

In addition, authorities should also consider:

- *previous delivery levels. Where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and*
- *recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified.*

7.16 The PPG also requires a calculation to be made of the total annual need for affordable housing, as follows:

“The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

*The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. **An increase in the total housing figures included in the plan may need to be considered** where it could help deliver the required number of affordable homes.”⁹ [Lichfields’ emphasis]*

7.17 The reference to uplifting the housing figures in the Plan to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than the local housing need.

7.18 We consider the aforementioned elements below in order to assess whether circumstances exist to justify uplifting the LHN figure generated by the standard method.

Economic Growth Strategies

7.19 The NPPF [§81c] states that planning policies should “*seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment*”. This retains the link between integrating economic growth and housing need. There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. The GMSF has failed to explore whether, in light of likely future job growth, there is likely to be a knock-on increase in the housing need for Greater Manchester (above that indicated by the demographic-led LHN generated by the standard methodology).

7.20 Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and therefore congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly given great importance, and the NPPF highlights this by stating that “*significant weight should be placed on the need to support economic growth and productivity*” [§80].

7.21 Fundamentally, the economic strategy that underpins the GMSF appears to be flawed and poorly related to the housing need target. To take one example, the 2018 Greater Manchester

⁹ PPG: ID: 2a-027-20180913

Forecasting Model [GMFM] which forms part of the economic evidence-base for the GMSF, appears flawed on a number of levels. For example, over the Plan period 2018-37, the GMFM baseline assumes a population growth of 166,757 residents across Greater Manchester, with the Accelerated Growth Strategy [AGS] assuming net growth of 217,065. However, the 2014-based SNPP indicates a net population growth of 259,800 - some 56% above the GMFM baseline and even 20% above the supposed AGS. Given that the housing target is based solely on the 2014-based SNHP with a modest adjustment for affordability, it is unclear how the economic growth aspirations and housing targets can possibly be mutually reinforcing when the basic building block of both models is completely misaligned. The economic growth model therefore appears to be flawed and we would question the robustness of its findings on this basis.

- 7.22 Just as importantly, the GMFM baseline indicates that all of this growth is expected to be in the over 65s age group. The proportion of the GM population aged 65 and over is due to increase significantly in the period 2018-2037 by a massive 38%, or 168,274 residents. In stark contrast, the number of GM residents aged 16-64 is due to fall by 0.4%, or -7,637. Given that the vast majority of the over 65s are likely to be leaving the workforce, or at least winding down towards retirement, it is unclear how GM's population will possibly accommodate a net employment growth of 109,403 over the same time period. The evidence seems to suggest that those aged 65 and over will work beyond this age when the opposite is likely to be true. It is more likely that people in this age bracket will be looking to retire at that point in their lives or at least look to work a reduced number of days/hours as they enter into retirement.
- 7.23 We also note that the sectors being targeted for growth, such as digital and tech jobs, are likely to require an employee pool from a younger, more tech-savvy generation and are less likely to be well suited to those aged 65 and over. It is therefore essential that an increase in net-migration is planned for the conurbation, which would manifest itself in higher levels of housebuilding in order to attract and accommodate people of working age who will fill these roles.
- 7.24 To get the figures to work, it is our supposition that the GMFM has made unrealistic assumptions about increasing economic activity levels and productivity. The data in the GMFM suggests that although productivity (GVA per job) growth has flatlined since the previous recession, increasing from £44,018 in 2010 to £44,824 in 2018, the GMFM projects a dramatic increase, to £57,269 per job in 2038 – an increase of 28%. Given that the growth in the workforce will entirely be from residents aged 65+, this level of productivity growth is unlikely and merely seeks to suppress the need for new migrants in the model.
- 7.25 The GMSFM also assumes that there will be a substantial fall in net out-commuting, from 38,200 in 2018, to 15,500, without providing any evidence that this can be achieved.
- 7.26 The NPPF is clear that housing should not be a barrier to economic growth. It is therefore essential that sufficient housing is provided in order to accommodate an increase in the workforce. If this provision is not made, the likely outcome is an increase in commuting into Greater Manchester from outside of the region, which would result in unsustainable development and would not support the overall strategy of the GMSF, including its ambitions for Greater Manchester to be a carbon neutral city-region by 2038. In order to ensure that sufficient housing is provided, the employment and economic growth assumptions used in the GMFM should be based on robust, realistic and transparent evidence, which is not currently the case.

The Housing Deal

- 7.27 The PPG states that circumstances where an uplift to the LHN may be appropriate could include *“where growth strategies are in place, particularly where those growth strategies identify that*

additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals)”¹⁰.

7.28 In this regard, in March 2018 an ambitious Housing Package between the GMCA and Government was announced¹¹. It aims to better coordinate the planning, decision-making and delivery of housing across the city region. The package, of up to £68.25 million, is intended to deliver significant and sustained investment that maximises Greater Manchester’s growth potential and brings forward a pipeline of housing development across the city region. The package seeks to ensure that Greater Manchester will be able to capitalise on opportunities presented by large scale transport investment in the area, providing the types of high quality homes people want to live in and boosting economic growth across the Northern Powerhouse.

7.29 As part of the package, the GMCA committed to the following:

- *“Deliver 227,200 homes between 2015/16 and 2034/35 and ensure the Greater Manchester Spatial Framework reflects this. This is above the level proposed under the Government’s Local Housing Need assessment set out in the draft National Planning Policy Framework.*
- *Accelerate delivery rates to 12,375 homes per annum to 2026.” [page 1]*

7.30 Neither of these commitments are followed through in the revised Draft GMSF, which commits to delivering significantly fewer homes (26,220) over the course of the Plan period and this issue has been raised recently by MHCLG who have threatened to withdraw the funding unless the GMCA plan to deliver the agreed level of housing across the city-region. Furthermore, rather than accelerating delivery to 12,375 dpa to 2026, the proposed phasing of new housing in the GMSF will actually constrain rather than accelerate the delivery of housing in the early years of the plan. It proposes an annual average target of 9,200 dwellings for the period 2018-2023 and 11,070 homes per annum for the period 2024-2037, both of which are inadequate when compared to the accelerated delivery rate proposed in the Housing Deal.

The Northern Powerhouse Agenda

7.31 The Government re-asserted its support for the Northern Powerhouse through the publication of the *Northern Powerhouse Strategy*¹² which coincided with the Chancellor’s Autumn Statement in November 2016. The Strategy aims to unleash the economic potential of the North by improving connectivity both within and between towns, counties and city regions; addressing the disparity in skills between the North and some other parts of the country; ensuring the North is an excellent place to start and grow a business; and promoting trade and investment across the North [§1.2]

7.32 In this regard, Greater Manchester is clearly a key driver of growth for the Northern Powerhouse – it is economically strong, politically advanced and geographically well-placed. Through programmed investment¹³ including the £38 million identified for the National Graphene Institute, £78 million for the Factory theatre, £235 million for the Sir Henry Royce Institute, let alone the very substantial sums set aside for the transformation of the M62 into a smart motorway (£161 million), the Northern Hub rail scheme, continued Enterprise Zone investment and incentives and of course the HS2 Phase 2b from Crewe to Manchester amongst others, the sub-region is exceptionally well placed to benefit from the Government’s investment programme.

¹⁰ PPG: ID: 2a-010-20180913

¹¹ MCHLG Outline of Prospective Housing Package for Greater Manchester, March 2018

¹² HM Government (November 2016): Northern Powerhouse Strategy

¹³ Ibid

- 7.33 Planning for almost 2.5 million sqm of office floorspace will support Greater Manchester's role as the primary office location outside London, whilst 4.2 million sqm of new industrial and warehousing floorspace will help provide the large, high quality sites to take advantage of the conurbation's excellent strategic position.
- 7.34 However, the GMSF as it stands will fail to deliver this vision and does not embrace the spirit of growth, investment and regeneration represented in the Northern Powerhouse strategy. It is overly reliant on past growth trends and is insufficiently optimistic about the future growth in jobs, investment and population that could be achieved. It is too timid and does not reflect the *"boldness at the heart of our collective endeavours"* outlined in the 'Better Together' strategy¹⁴.
- 7.35 Greater Manchester is a sub-region of significant national importance to the UK economy and therefore faces unique economic pressures. The ability of the city's residents and workers (current and future) to be able to access affordable housing across all incomes and tenures is fundamental for Manchester to retain and grow its workforce. Failure to do so will have an impact on the UK's economic prosperity and the ability of the Northern Powerhouse to act as a counter-weight to London.
- 7.36 If Greater Manchester is to underpin the 'Northern Powerhouse' driving growth and reducing national inequalities as envisaged by the Government, the GMSF will need to be more pro-active in supporting economic growth and provide a clear vision for boosting housing requirements with a focus on how new infrastructure, such as HS2, is likely to boost business growth and attract new people to Greater Manchester.

The GMSF will Act as a Barrier to Growth

- 7.37 Insufficient, unaffordable and poor-quality housing in Greater Manchester does not just impact on its residents; it also acts as a disincentive to companies looking to invest in the area. The CBI report¹⁵ demonstrated that businesses regard the housing crisis as a major threat to competitiveness. Two thirds of businesses feel housing costs have a negative impact on the recruitment of staff at entry level.
- 7.38 The GMSF, as currently drafted presents a situation developing in Greater Manchester, where companies struggle to recruit and retain talented graduates and more senior employees, negatively impacting on the overall attractiveness of the region and potentially resulting in investment going elsewhere.
- 7.39 Given ongoing economic uncertainty it is vital that the GMSF provides a robust and flexible development strategy that boosts housing growth significantly to support new, highly skilled jobs and stimulate investment in the sub-region. A failure to do so risks further pressure on house prices and increased polarisation of society. The GMSF should not suppress the housing delivery that is essential to sustain Greater Manchester's economic growth.
- 7.40 The availability of an appropriate labour force is a key driver for inward investment, as is the ability to relocate existing staff into attractive areas. This is an important factor for the white collar, professional and managerial sectors as well as business owners, entrepreneurs and leaders. Taylor Wimpey considers that the 10,578 dpa will not provide the homes needed to attract future business leaders or a sufficiently skilled workforce to boost the economy.
- 7.41 Manchester's economic potential cannot be achieved without significant increases in housing supply, the scale of which should not be underestimated. It is only with a substantial step change in the supply of housing that affordability can even begin to be tackled (in southern parts

¹⁴ Better Together - Greater Manchester Strategy (2013) – Foreword [Page 4]

¹⁵ Housing Britain: Building New Homes For Growth (2014)

of the sub-region in particular), and a genuine choice for residents, current and future, can be achieved. More specifically, there is a need to establish and plan for the full needs for market and affordable housing in the Local Plan, as required by the Framework.

- 7.42 Greater Manchester should learn from London's failures by pursuing a population and demographic assessment which better reflects the sub-region's success in attracting new residents and one which demonstrates an intention to retain these residents within its boundaries. Further homes should be provided, particularly in the southern and eastern parts of the conurbation.

Strategic Infrastructure Improvements

- 7.43 The PPG states that the LHN could also be uplifted where strategic infrastructure improvements are planned that would support new homes¹⁶.

- 7.44 The Greater Manchester Strategy [§6.20] states that it will capitalise on the investment planned at Manchester Airport, including the arrival of HS2 and Northern Powerhouse Rail, to strengthen Greater Manchester as an internationally competitive employment location. It emphasises the importance of delivering this infrastructure in order for Greater Manchester to achieve economic growth. It states:

“Given the decision to withdraw from the European Union, we need to focus on maximising our existing competitive advantages. Greater Manchester has always been an outward looking city with a rich history of global trade and welcoming of diversity and talent. Remaining open, international and connected will be ever more important in the coming years. As the heart and driver of the Northern Powerhouse economy, we need to prepare for, and take advantage of, the transformational opportunities major infrastructure improvements, such as HS2 and Northern Powerhouse Rail, will provide”. [§6.2]

- 7.45 The Greater Manchester Strategy [§5.2] also notes that a skilled workforce is essential to deliver the key infrastructure projects on which prosperity depends. It emphasises the need to bring together policies and investments around housing and transport to create inclusive, sustainable, growth locations [§6.19]. To provide an example of the amount of employment which may be generated by these strategic infrastructure improvements, GMCA growth and reform plans¹⁷ suggest that the HS2 hub at Piccadilly station has the potential to create 30,000 net additional jobs in the immediate vicinity of the station.

- 7.46 In addition, the Transport for the North [TfN] Strategic Transport Plan seeks to realise the benefits of agglomeration and economic mass, in the North by providing faster, more efficient, reliable and sustainable journeys on the road and rail networks. It sets out a vision of *“a thriving North of England, where world class transport supports sustainable economic growth, excellent quality of life and improved opportunities for all.”* [page 6]. Under the transformational growth scenario outlined in the plan, it notes that growth is expected in high and medium-skilled occupations (an increase of 35,300 and 1,600 jobs per annum by 2050, respectively), while jobs in low-skilled occupations are expected to stabilise from 2030 after a decline since 2015 [page 40]. Whilst we note that the Strategic Transport Plan covers a much wider area than Greater Manchester, it is clear that a portion of this growth would be accommodated within Greater Manchester given its position within the north as a major economic power.

¹⁶ PPG: ID: 2a-010-20180913

¹⁷ A Plan for Growth and Reform in Greater Manchester, March 2014

- 7.47 It is therefore imperative that sufficient housing of the right type is provided to attract this skilled workforce and help deliver these key infrastructure improvements.

Previous Delivery Levels

- 7.48 The PPG¹⁸ is clear that where previous housing delivery has exceeded the minimum need identified there should be a consideration of whether the level of delivery is indicative of greater housing need. For Greater Manchester, on an annual basis, there have been years when the 10,578 dpa target has been significantly exceeded. Of particular note, 12,220 net additional dwellings were delivered in 2006/07, and 14,850 dwellings were delivered in 2007/08 prior to the recession. Completions have also increased year-on-year since 2013/14 as the economy has recovered, with delivery rates having more than doubled between 2013/14 and 2017/18. Whilst it is a positive that the GMCA is planning for an increase in recent levels of housing delivery, the proposed delivery rate would be 30% lower than the delivery rate of almost 15,000 houses achieved just before the financial crisis in 2007/08.

Table 7.2 Net Housing Completions in Greater Manchester 2004/05 to 2017/18

Year	Net Completions
2004/05	8,083
2005/06	8,883
2006/07	12,225
2007/08	14,846
2008/09	8,138
2009/10	4,753
2010/11	4,127
2011/12	3,391
2012/13	5,345
2013/14	4,161
2014/15	5,417
2015/16	6,186
2016/17	7,892
2017/18	8,961

Source: MHCLG Table 122 Net Additional Dwellings

- 7.49 Whilst recent net completion rates have not reached the level of the 2006-2008 peak this has not been due to a lack of developer appetite. The reason for this can be at least partially attributed to the lack of up to date and adopted development plans in place in Greater Manchester over recent years. Table 7.3 sets out the current local plan status of each GM authority and identifies those authorities which do not currently benefit from an adopted plan for which the plan period covered has yet to expire. It also identifies those authorities where a Unitary Development Plan [UDP] is still in place, and where a Core Strategy [CS] has been adopted but the corresponding Allocations Development Plan Document [DPD] has not reached adoption stage.

¹⁸ PPG: ID: 2a-010-20180913

Table 7.3 GM Local Authority Development Plan Progress

Local Authority	Development Plan Document	Status	End date of the Plan
Bury	Bury UDP	Adopted 1997	2001
Bolton	Bolton CS Allocations DPD	Adopted 2011 Adopted 2014	2026 2026
Manchester	Manchester CS Site Allocations DPD	Adopted July 2012 Not adopted	2027 Not adopted
Trafford	Trafford CS Site Allocations DPD	Adopted January 2012 Not adopted	2026 Not adopted
Stockport	Stockport CS Site Allocations DPD	2011 Not adopted	2026 Not adopted
Salford	City of Salford UDP	2006	2016
Tameside	Tameside UDP	2004	2011
Oldham	Oldham Council CS Site Allocations DPD	2011 Not adopted	2026 Not adopted
Rochdale	Rochdale CS Site Allocations DPD	2016 Not adopted	2028 Not adopted
Wigan	Wigan CS Site Allocations DPD	2013 Not adopted	2026 Not adopted

Source: Lichfields

7.50 As Table 7.3 shows, the adopted plans of three authorities (Bury, Salford and Tameside) are time expired. In addition, whilst Manchester, Trafford, Stockport Oldham, Rochdale and Wigan have adopted core strategies in place, the accompanying site allocation DPDs have not reached adoption stage. Only 3 of the 10 authorities have had plans adopted since the original Framework was published in March 2012. This lack of up-to-date development plans across the conurbation has undoubtedly inhibited the delivery of readily-available allocated sites. This has in turn stifled supply at a time when the Government is seeking to boost housing numbers.

7.51 Previous development rates and the increases in delivery over recent years demonstrates that Greater Manchester has a market which is ready and able to absorb much higher quantities of housing than the 10,578 dpa currently proposed. Consideration should therefore be given as to whether delivering housing higher than the minimum starting point of the standard method is appropriate.

Recent Assessments of Need

7.52 Taylor Wimpey notes that recent assessments of housing need in Greater Manchester have suggested that a higher housing figure than the 10,578 annual figure proposed in the GMSF is appropriate. The Greater Manchester Strategic Housing Assessment [2016], which also incorporated the 2014-based SNHP, concluded that an OAN of 11,360 dpa was appropriate for the period 2015-2035. This equates to a housing need of over 780 dpa higher than the current figure. In our representations to the GMSF consultation in December 2016, we considered that 11,360 dpa underplayed the true level of housing need due to a failure to provide appropriate uplifts to address evidence of worsening market signals, affordable housing and economic growth which would have resulted in an even higher annual requirement.

7.53 In any event, the GMSF fails to accord with the recommendations of the PPG as it does not demonstrate why its assessment of lower need is justified.

Affordable Housing Needs

- 7.54 With regards to the incorporation of affordable housing needs into the total housing figures included in Local Plans, the PPG¹⁹ sets out the following:
- “The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” (Lichfields emphasis)*
- 7.55 The PPG therefore sets out that ‘*the total housing figures*’ are about much more than just demographic need and should consider how and whether affordable housing needs can be met. This is in the context that the NPPF (at para 62) requires LPAs to specify the type of affordable housing required where a need is identified.
- 7.56 The Barker Mills High Court judgment²⁰ considered uplifts to OAN to address affordable housing need in the context of a challenge to a Local Plan. The judgment, in the context of a Local Plan process, placed consideration of an uplift for affordable housing into the second of a two-stage process, the first being calculation of OAN and the second being a ‘policy-on’ adjustment (i.e. one that is made through the Local Plan process and thus not part of the OAN). The Jelson judgment²¹ is also relevant in this context. In short, in considering the refusal of planning permission for housing, the Inspector in this case (as a matter of planning judgment), accepted the need for affordable housing to make up a necessary component of OAN for housing in the council’s area, or in the context of the Barker Mill judgment, as part of the first stage calculation of OAN.
- 7.57 Both of these judgements were issued before the publication of the revised NPPF in February 2019 and the revisions to the Housing Need Assessment section of the PPG (also in February 2019); However, the key paragraph of the PPG relating to the need to increase the total housing figures included in the plan where it could help deliver the required number of affordable homes²², is almost identical to the previous iteration.
- 7.58 A full assessment of affordable housing need has not been carried out, in part due to difficulty in obtaining the relevant data.
- 7.59 However, taking the evidence contained in the GMCA’s latest SHMA (2019) at face value indicates a net affordable housing need totalling 4,678 dpa across the ten authorities. The Revised Draft GMSF states that increasing the delivery of affordable housing across Greater Manchester “*is a very high priority*” [paragraph 7.17] and Policy GM-H-2 (discussed in further detail below) sets out the GMCA’s aim to deliver at least 50,000 new affordable homes across Greater Manchester over the period 2018-2037, which would equate to 2,632 dpa – about half of the SHMA’s net annual target and equal to about 25% of the overall 10,578 dpa housing target. This suggests that there could be a justification for uplifting the housing need, particularly in the short term.
- 7.60 Furthermore, this is only justified if the affordable housing need figure is correct. Taylor Wimpey has concerns regarding elements of the methodology that could justify a higher

¹⁹ ID 2a-027-20180913

²⁰ Trustees of Barker Mills Estates & Test Valley Borough Council vs SoS for DLG [2016] EWHC 3028

²¹ ‘Jelson Ltd. v Secretary of State for Communities and Local Government, Hinckley and Bosworth Borough Council [2018] EWCA Civ 24’

²² ID 2a-033-20190220

affordable housing need figure as a result. The SHMA's conclusions are based on the assumption that a third of gross household income will be spent on rent (SHMA page 204). No justification is provided for this. Whilst it is fair to say that in respect of renting there is no official, or definitive, threshold for how much a household can spend on rent before it is unaffordable, the former CLG SHMA Guidance (2007) sets out that a household can be considered able to afford renting on the private market in cases where the rent payable was up to 25% of their gross household income.

7.61 We disagree with the SHMA's use of a 33% income threshold, in light of the findings of a number of Inspectors, for example:

1 In East Hampshire, the Council proposed to use a 30% income threshold for affordable housing needs. The East Hampshire Local Plan Inspector stated that:

“instead of planning positively to help assuage acute housing affordability pressures by, say increasing supply, the SHMA appears to advocate an approach which down plays demand. It may well be that, in order to live in a decent home, people are forced to spend more. However, it is not right, in my view, to plan on the basis that it is acceptable for those in need to have their already limited incomes squeezed just so they can live in a decent home (and the need for affordable housing reduced for the purposes of plan making).” (para 18).

This is effectively what the SHMA is doing by referencing the current level of income spent on affordable housing. Households in Greater Manchester may currently be forced to spend up to 33% of their income on housing, but this does not justify a continuation.

2 In Eastleigh, the Local Plan Inspector (para 33 of his Interim Findings) stated that:

“I see no justification for the Council assuming that more than 30% of income could reasonably be spent on housing. Some households may be forced to do so, but that does not make it a justified approach to assessing need.”

7.62 Taking into account all of the above, the income threshold should be 30%, at the very most, although in reality for a household to have a residual income on par with a national equivalent (taking account of differences in the cost of living), the threshold is likely to be in the range of 25-30%.

7.63 Based on the evidence provided in the 2019 SHMA, Table 7.4 sets out the net affordable housing need for each GM district and for Greater Manchester as a whole. The annual LHN identified for each district and the annual requirement as distributed in the GMSF are also included in this table for comparison purposes.

Table 7.4 Net Affordable Housing Need by Greater Manchester District

District	2019 SHMA Net Annual Affordable Housing Need	LHN (annual)	GMSF Target (annual)	Affordable housing need as a % of the GMSF Target
Bolton	496	791	726	68.3%
Bury	263	608	498	52.8%
Manchester	1,156	2,584	2,870	40.3%
Oldham	422	716	752	56.1%
Rochdale	307	514	640	48.0%
Salford	613	1,372	1,720	35.6%
Stockport	595	1,087	764	77.9%
Tameside	503	632	466	107.9%
Trafford	446	1,335	1,015	43.9%
Wigan	31	944	1,126	2.8%
Greater Manchester	4,678	10,583	10,578	44.2%

Source: 2019 SHMA – Note – red shading indicates where the percentage need is higher than the GM average

7.64 The GMCA has provided no analysis of the impact of affordable housing need upon the LHN in the GMSF. With regard to this matter, the Housing Topic Paper²³ indicates that no regard has been given to affordable housing need in deriving the LHN. It states:

“The link between the affordable housing need and the overall need for housing (or the local housing need) is complex. Many of the households in need are already living in accommodation (existing households) and simply require an alternative form of housing, and the analysis does not suggest that there is any strong evidence of a need to allocate additional housing land specifically to help address the affordable need” [3.16].

7.65 However, the net affordable housing need identified in the 2019 SHMA suggests that this is not the case. As Table 7.4 shows, the annual affordable housing need for Greater Manchester is equivalent to almost 45% of the 10,583 annual LHN identified in the Housing Topic Paper.

7.66 When an assessment on a district basis is undertaken, the issue is even more stark. For example, the net affordable need for Stockport (595 dwellings) is equivalent to 78% of the housing target identified for the district (764 dwellings). Of even greater concern, the net affordable need identified for Tameside is actually 8% higher than the entire annual figure to be distributed to Tameside in the GMSF (466 dwellings). A number of other districts display high levels of need. These include Bolton (equivalent to 68% of the proposed GMSF housing target), Oldham (equivalent to 56% of the GMSF figure) and Rochdale (equivalent to 48% of the GMSF figure).

7.67 In contrast, Wigan’s net affordable housing need is just 3% of its GMSF target, yet this is one of the districts which has seen its housing figure increase as a result of the GMCA’s redistribution. This makes no sense and clearly indicates that the redistribution has been made entirely on the basis of political, policy and supply considerations, rather than a proper interpretation of need.

7.68 In terms of the affordability ratio over the past 5 years (Table 7.5), all ten authorities experienced a worsening in the affordability ratio with 9 of the 10 authorities increased at a percentage higher than the England average. In particular, Bury, Salford, Stockport and Trafford experienced more than a 25% increase in the affordability ratio between 2012 and 2017.

²³GMCA (January 2019): Housing Topic Paper

Table 7.5 Affordability Ratio Comparison (2012-2017)

District	Affordability Ratio 2012	Affordability Ratio 2017	% Difference
Bolton	4.84	5.23	+8%
Bury	5.18	6.51	+25.7%
Manchester	4.61	5.35	+16%
Oldham	5.11	5.55	+8.6%
Rochdale	5.04	5.62	+11.5%
Salford	4.30	5.63	+30.9%
Stockport	5.88	7.56	+28.6%
Tameside	4.71	5.54	+17.6%
Trafford	6.71	8.94	+33.2%
Wigan	5.11	5.34	+4.5%
North West	5.12	5.53	+8%
England	6.61	7.13	+7.9%

Source: ONS

- 7.69 In accordance with the PPG, Taylor Wimpey therefore considers that an increase in the total housing figures included in the plan is required in order to help deliver the identified need for affordable housing in the 2019 SHMA.

Do you agree with the proposed policy on the Affordability of New Housing?

- 7.70 Policy GM-H 2 (Affordability of New Housing) sets out the GMCA's aim to deliver at least 50,000 new affordable homes over the plan period (2018-2037) which equates to 25% of the total 200,000 homes to be delivered (2,632 annually).
- 7.71 The 'aim' to deliver 50,000 affordable homes (2,632 annually) is more than double the 1,211 affordable homes currently being delivered across GM. This appears very challenging, given that the supply comprises predominantly complex PDL sites or sites in districts with weaker housing markets where revenues are constrained to the north and east, hence viability pressures may restrict social housing delivery.
- 7.72 Taylor Wimpey considers that the Revised Draft GMSF fails to take affordability issues into account, despite acknowledging that this is an issue in Greater Manchester. For example, the GMCA notes that if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs [§7.4]. Taylor Wimpey fully agrees with this statement. Similarly, we agree with the sentiment expressed in Policy GM-H-2, where GMCA states that affordability will be improved through “*significantly increasing the supply of new housing across Greater Manchester, in accordance with Policy GM-H-1 ‘Scale of New Housing Development’, thereby reducing the potential for a shortfall to lead to large house price and rent increases*”.
- 7.73 However, the GMSF fails to follow through with these statements, firstly by providing insufficient housing across the entire sub-region (discussed in detail above), and then seeking to exacerbate the issue by cutting the housing targets in the most unaffordable parts of the conurbation and increasing the housing targets where market signals are weakest. This is counter-intuitive and will undoubtedly worsen the current situation by making areas such as Stockport and Trafford even more unaffordable and encouraging people to move further afield into Cheshire, Derbyshire and Lancashire.

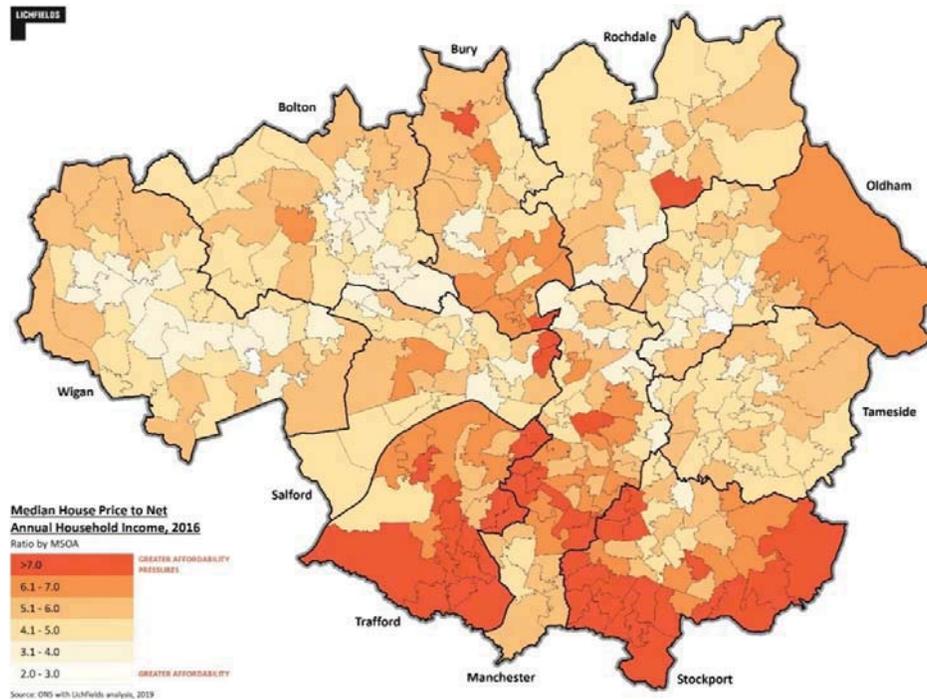
Table 7.6 Comparison of Housing Targets with Affordability Ratios

District	LHN	Adjusted Housing Target	Difference	Affordability Ratio 2017
Trafford	1,335	1,015	-320 (-24.0%)	8.94
Stockport	1,087	764	-323 (-29.7%)	7.56
Bury	608	498	-110 (-18.1%)	6.51
Salford	1,372	1,720	348 (+25.4%)	5.63
Rochdale	514	640	126 (+24.5%)	5.62
Tameside	632	466	-166 (-26.3%)	5.54
Oldham	716	752	36 (+5.0%)	5.55
Manchester	2,584	2,870	286 (+11.1%)	5.35
Wigan	944	1,126	182 (+19.3%)	5.34
Bolton	791	726	-65 (-8.2%)	5.23
Greater Manchester	10,583	10,578	-5 (0.0%)	-

Source: GMCA (2019): GMSF revised Draft 2019 / GMCA (2019): Greater Manchester SHMA Table 3.2 / MHCLG (2018): Ratio of median house price to median gross annual workplace-based earnings by local authority district, 1997 to 2017

- 7.74 Table 7.6 emphasises how the GMCA's position is illogical. The three GM districts with the most severe affordability issues - Trafford, Stockport and Bury - have all seen their baseline housing needs actually reduced by anywhere between 18% and 30% and redistributed to areas where housing pressures are much weaker.
- 7.75 So Wigan for example, which has the lowest affordability pressures of anywhere in Greater Manchester with the exception of Bolton, has one of the highest increases in housing – an uplift of 19% above its LHN.
- 7.76 In contrast, Trafford Borough, which had a workplace-based median affordability ratio of 8.94 in 2017 (higher than the England and Wales average of 7.78 and above any other authority in northern England with the exception of the affluent rural authorities of South Lakeland, Hambleton and Harrogate) has its housing target cut by almost a quarter.
- 7.77 This might be acceptable if there were strong migratory linkages between the authorities that were benefiting from the redistributed housing need, but as we set out in our response to Question 44, this is not the case – of all the people who moved into Trafford Borough in the year before the Census, just 0.8% moved from Wigan, 0.6% from Rochdale and 4.0% from Salford (the three areas that have the greatest increase in their housing targets following the GMCA's redistribution). There are therefore very weak migratory linkages between these areas and Trafford, and it is unrealistic to suppose that providing more homes in these areas will help improve the district's affordability crises.

Figure 7.1 Affordability Ratios in Greater Manchester, 2016



Source: Lichfields / ONS

7.78 Figure 7.1 very clearly demonstrates the extent to which affordability issues are concentrated in the south of the sub-region, in Trafford and Stockport, with pockets of (un)affordability in places such as Didsbury in Manchester; Bury; and Saddleworth in Oldham. These are also the areas where housing supply in the GMSF is often the most restricted.

Question 43: Do you agree with the proposed policy on the Type, Size and Design of New Housing?

7.79 Policy GM-H 3 states that development across Greater Manchester should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across Greater Manchester as a whole.

7.80 The NPPF requires that plans assess the size, type and tenure of housing needed for different groups in the community, including family housing [§61]. The GMCA has failed to assess and seek to meet this national policy requirement in Policy GM H-3. Taylor Wimpey is concerned that the general approach suggested to determining the size, type and design of new housing is fundamentally flawed and will not deliver the housing required.

7.81 Evidence in the GMCA's 2019 Strategic Housing Market Assessment [SHMA] suggests that Greater Manchester already has a higher proportion of 1 and 2-bedroomed dwellings than the North West. Greater Manchester currently has a lower proportion of dwellings with four or more bedrooms than both the regional and national averages. Manchester and Salford both have significantly higher proportions of flats than the Greater Manchester, regional and national averages; in Manchester flats are the most prevalent property type. This is likely to be a reflection of historic high density social housing construction; the relatively new city centre

apartment market; and the considerable number of large houses sub-divided into flats to cater for students and young professionals [§§4.87-4.90].

- 7.82 The Greater Manchester Housing Survey (2017)²⁴ suggested that of local 2,000 respondents, 80% wanted to own a home in a suburb; 84% were seeking a home with a private garden; and just 8% want to live in an apartment in the City Centre. The GMSF housing policy seeks to deliver almost the exact opposite of what local people aspire towards.
- 7.83 There is no clear explanation in the GMSF as to how families will be catered for through dwelling mix other than the suggestion that there is scope to increase the number of families living in apartments [§7.24]. This approach is completely contradictory to the findings of the GM Housing Survey and drastically fails to address the significant need for family housing. There is also a lack of any explanation as to how education, health and recreation infrastructure could be provided in the City Centre to support such high-density apartment developments that will presumably have to accommodate large numbers of children. The GMSF's strategy approach is therefore inconsistent with the evidence.
- 7.84 The evidence provided in the 2019 SHMA supports the case for the provision of additional family housing. It notes that by 2035, the number of dwellings in Greater Manchester containing any dependent children is expected to rise to just over 383,000, a rise of 9.6% or +33,000 [§6.95]. This is higher than the average for the North West as a whole (where the total rise in households with dependent children is expected to be 7.5%). Table 8.108 of the 2019 SHMA suggests that in the southern part of the GM area, the need for family homes is particularly acute. In Stockport for example, the number of dwellings with dependent children is anticipated to increase by 13.6%. Should this need not be adequately addressed through a mix which prominently features larger family housing, it is highly likely that current trend of high migration outflows to Cheshire East and High Peak will be exacerbated as people look for larger executive housing in attractive locations.
- 7.85 In order to understand the different possible impacts on the future new housing type and size mix for Greater Manchester, the 2019 SHMA applies three scenarios to the household projections for both dwelling type and size and tenure, as follows:
- 1 **Scenario 1: Applying the 2011 size and type and tenure mix to the Greater Manchester household projections:** This scenario assumes no change to the size and type or tenure of dwelling mix until 2035.
 - 2 **Scenario 2: Continuing the 2001-2011 change to the Greater Manchester household projections:** This scenario assumes that the changes in housing type and size and tenure between 2001 and 2011 would be continued until 2035.
 - 3 **Scenario 3: Applying the 2011 size and type and tenure mix found in London to the Greater Manchester household projections:** This scenario assumes that Greater Manchester achieves a density, type and tenure mix comparable with that of a global city such as London by 2035 and so models a household type, size and tenure mix more similar to that of the capital.
- 7.86 Figure 7.2 shows the type and size mixes generated by these scenarios.

²⁴ Housing the Powerhouse (2017): Ipsos MORI North surveyed 2,000 adults (aged 18+) in the 10 local authority areas of Greater Manchester between 26 May and 4 June 2017

Figure 7.2 2019 SHMA Table 4.8

Table 4.8: Indicative new accommodation type and size mix for Greater Manchester

	Scenario 1 2011 size and type and tenure mix	Scenario 2 2001-2011 trends continue	Scenario 3 2011 size and type and tenure mix found in London
Detached or semi-detached house or bungalow- 3 beds or fewer	40-45%	30-35%	15-20%
Detached or semi-detached house or bungalow- 4 beds or more	10-15%	10-15%	5-10%
Terraced house or bungalow- 2 beds or fewer	15-20%	15-20%	5-10%
Terraced house or bungalow- 3 beds or more	10-15%	10-15%	15-20%
Flat maisonette or apartment- 1 bed	5-10%	10-15%	15-20%
Flat maisonette or apartment- 2 beds or more	5-10%	10-15%	25-30%

Sources: Census Commissioned Tables C1398 (2001), CT0345 (2011), CT0770 (2011); MHCLG Household Projections (2014-based); GMCA modelling

Source: 2019 SHMA

- 7.87 Unhelpfully, the 2019 SHMA does not reach any conclusion on the most suitable scenario to take forward and therefore fails to shed any light on how its findings may inform the future dwelling mix.
- 7.88 However, we note that the GMSF focuses on delivering high density homes and distributes 43% of housing to Manchester City and Salford. Many of these homes will comprise 1 / 2-bed apartments targeting a niche market and failing to accommodate the actual needs of Greater Manchester. Table 18 of the 2019 Housing Topic Paper splits the identified supply of houses and apartments (excluding windfalls and allowance for losses) across the GM districts. In Greater Manchester as a whole, the split is 40.4% houses and 59.6% apartments. In some of the southern districts the picture is also stark. For example, in Stockport, where the number of dwellings with dependent children is anticipated to increase, the house type split is 35.4% houses and 64.6% apartments. The reliance on apartments is therefore excessive given the clear need to provide a variety of types, size and tenures. This ignores the issue of whether a greater range and choice of family housing is needed in the sub-region.
- 7.89 This is despite evidence outlined in the Manchester Independent Economic Review²⁵ [MIER] that states that addressing the limitations of Greater Manchester's housing stock by providing more family homes is essential if it is to retain and attract more of the labour force that will drive the Northern Powerhouse economy:
- “The availability of housing is an important element of the attractiveness of MCR as a place to live. Two points have arisen from the evidence we have gathered. The first is the vital role housing plays in ensuring opportunities in the more deprived parts of MCR. The second is the cost in terms of attracting skilled labour of a shortage of the kind of housing high-skilled and professional workers demand in the places where they need it. This is increasingly in the south of the City and North Cheshire, although of course there are popular residential areas throughout MCR”.*

²⁵ Manchester Independent Economic Review (2001), page 22

7.90 The Greater Manchester Strategy²⁶ also recognises the need to provide a range of housing in order to support the growth ambitions for the region and attract and retain the skilled workers who are required to meet these ambitions. It states:

“We will continue to support development in existing suburban areas which are attractive housing locations and seek to bring forward development in other neighbourhoods that have the attributes to sustainably attract and retain a highly skilled workforce”. [§8.7]

7.91 It also emphasises the need to provide housing to support families:

“Appropriate housing to meet the needs of families throughout their lives is also vital to building stable family environments to support the best start in life”. [§3.6]

7.92 This is particularly important, because the provision of a suitable range of housing types in the right locations is crucial in order to ensure that local residents can meet their housing aspirations and move up the housing ladder whilst remaining in Greater Manchester. Taylor Wimpey is concerned that the absence of any discussion at this stage on meeting a wide range of housing needs is flawed, and should necessarily feed into the discussion on overall housing numbers.

7.93 Similar considerations were explored at Cardiff’s Local Plan Examination, where even before the Plan progressed to Examination, the Inspector advised that the distribution strategy be reconsidered given an unjustified reliance of windfall sites (approx. 30%) and concentration of housing at Cardiff Bay in the form of apartment schemes resulting in an unbalanced response to the needs of local people for a range of housing, including family housing.

Question 44: Do you agree with the proposed policy on the Density of New Housing?

7.94 Policy GM-H 4 of the GMSF proposes stringent housing densities to be applied reflecting the relative accessibility of sites. This approach is geared towards delivering high density apartment schemes in Manchester City and Salford and reducing the need for Green Belt release.

7.95 Taylor Wimpey is concerned that the Policy is overly prescriptive and will not meet the needs of the markets it is intended to serve. The advantages of setting minimum density requirements to achieving the delivery of sites on existing brownfield sites within the urban area are recognised. However, the revised draft GMSF has little regard to site specific constraints such as flood risk, topography, ecology etc. which can reduce the net developable area of a site; nor does it have regard to the financial viability of delivering these (often complex) brownfield sites.

7.96 Taylor Wimpey considers that the revised draft GMSF also fails to take into account different housing markets. The GMSF provides no evidence that the high-density housing will meet the needs of all households, and certainly not families with children who will require a range of services and community facilities, such as primary schools, which are largely unavailable in the City Centre. The policy risks placing too much emphasis on delivering high density apartments within urban centres. It does not take into account that many families want to live in larger suburban family homes with private outdoor amenity space. England is in the middle of a housing crisis with an ever-increasing need for more family homes. The 2019 SHMA also demonstrates that family housing is a sector which is expected to rise up to 2035. The GMSF therefore needs to plan for a range of family homes in a number of locations across the combined authorities and the density requirements set out in Policy GM-H 4 could hamper the delivery of such development by seeking more intense development of smaller homes.

²⁶ Our People Our Place: The Greater Manchester Strategy

- 7.97 Furthermore, higher densities are unlikely to be achieved in locations where executive housing is most needed, particularly in south Manchester. This is not necessarily matching need with demand and further reduces the likely deliverability and realism of the forward supply.
- 7.98 An over-reliance on high density dwellings (particularly apartments) may increase overall housing numbers, but in practice it will deter families and executives from locating in the area. This in turn will hamper the ability of Manchester to deliver its economic growth objectives and will, at the very best, significantly increase commuting levels and congestion. The GMSF therefore lacks an analysis of the type of housing required, and how the growth in smaller families forecast is not always suited to high density apartment living.
- 7.99 The density ranges quoted in the policy are therefore considered to be unrealistic and have the potential to hamper the delivery of larger family homes. Higher density development also reduces the opportunities for placemaking and creating communities in which people aspire to live. The GMSF needs to consider placemaking as a fundamental part of its strategy rather than releasing the least amount of land and delivering high density developments which have poor urban realms and insufficient open space and facilities.

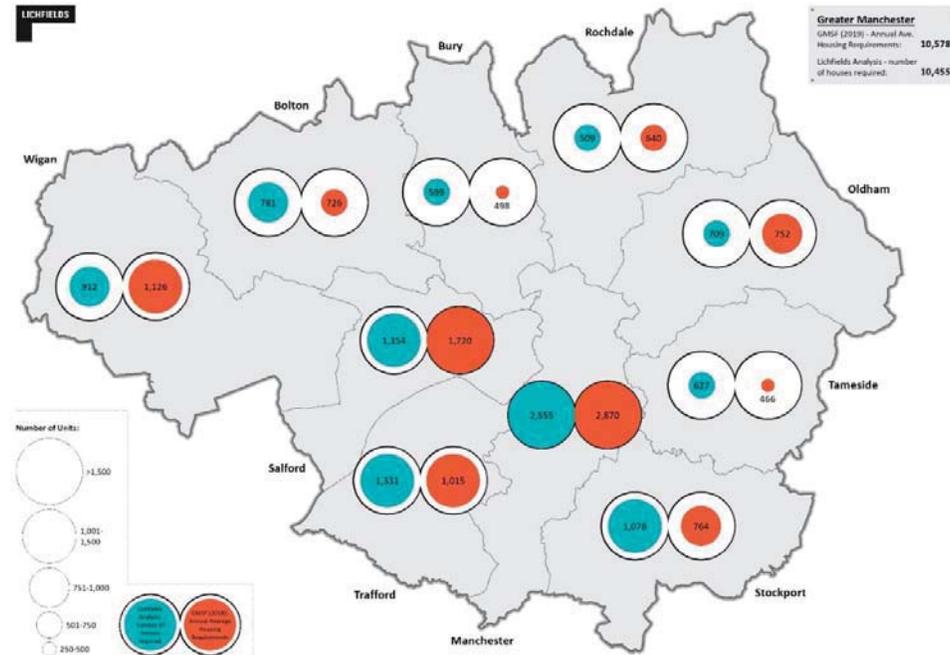
Question 45: Do you have any further comments on the policies and overall approach proposed in Homes for Greater Manchester?

With regard to the policies and overall approach proposed Taylor Wimpey wishes to make the following additional comments.

Distribution of New Housing Within Greater Manchester

- 7.100 The GMCA assumes that a single HMA operates across the whole of GM, which it believes justifies a redistribution of the overall housing allocation towards the central and northern districts and away from the more affluent south [§7.8]. This assumption (that a family seeking to move to Bramhall in Stockport would be equally happy to move to Wigan) is a poor reflection of how the GM housing market actually operates, as reflected in clear discrepancies in house prices [GMSF Figure 7] and affordability ratios. It also conflicts with the finding in the 2008 Greater Manchester SHMA that 4 HMAs were in operation across GM. Detailed reasoning and evidence to justify the claimed position that Greater Manchester operates as one HMA has not been provided to justify the divergence away from the previously-claimed position.

Figure 7.3 GMSF Local Housing Targets Compared to LHN



Source: Lichfields

- 7.101 The GMCA has not distributed the housing need across the districts as per the standard method, but has instead redistributed the housing allocations based on political/policy/supply objectives. The GMSF states that promoting higher levels of housing growth in central and northern districts will achieve a more balanced and sustainable pattern of growth, support local economies and reflect the availability of suitable sites.
- 7.102 The redistribution is illustrated in Figure 7.3 which compares the revised draft 2019 GMSF local housing targets for each district against the LHN calculated using the revised standard method. Figure 7.3It shows there are clear disparities between the LHN and the revised GMSF targets in most areas, notably Stockport (1,078 LHN versus the 764 dpa GMSF target). Bolton and Tameside, two of the most deprived districts in Greater Manchester, both have reduced housing targets, despite the GMSF policy claiming that housing growth has been used as a tool to boost prosperity and reduce inequalities.

Defining HMAs

- 7.103 The PPG²⁷ states that a Housing Market Area [HMA] is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. These can be broadly defined by analysing:
- The relationship between housing demand and supply across different locations, using house prices and rates of change in house prices. This should identify areas which have clearly different price levels compared to surrounding areas.
 - Migration flow and housing search patterns. This can help identify the extent to which people move house within an area, in particular where a relatively high proportion of short household moves are contained, (due to connections to families, jobs, and schools).

²⁷ ID: 61-010-20180913

- Contextual data such as travel to work areas, retail and school catchment areas. These can provide information about the areas within which people move without changing other aspects of their lives (e.g. work or service use).

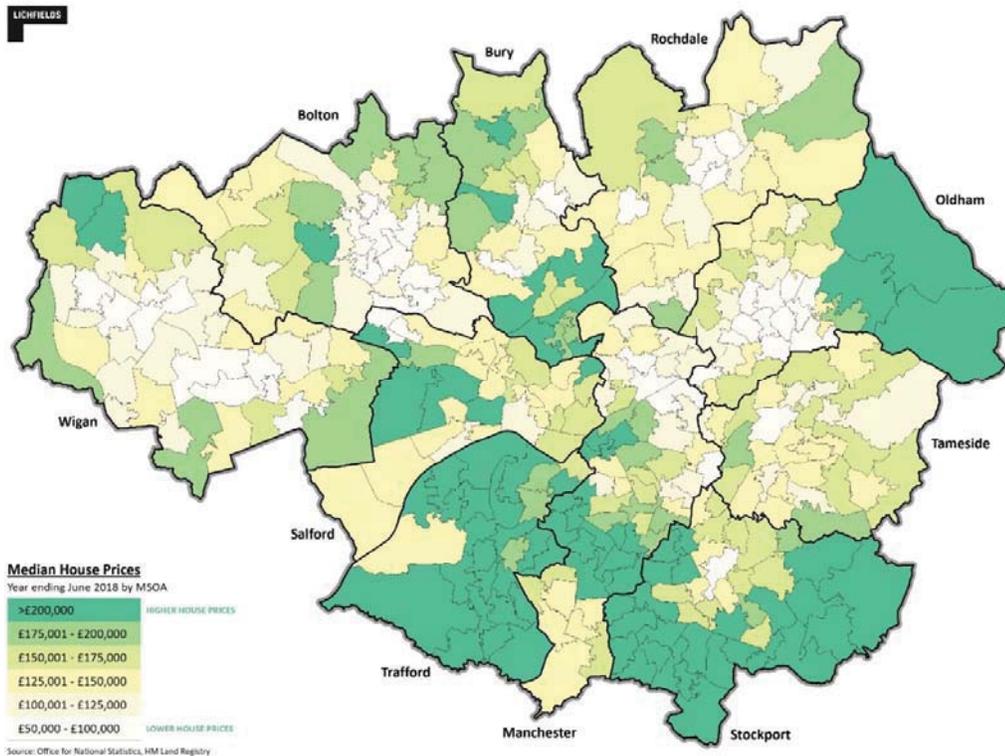
7.104 We consider these methods of analysis in turn below.

House Price Data

7.105 House price data clearly demonstrates that Greater Manchester is a complex mix of different housing markets. Figure 7.4 illustrates median house prices in the year ending June 2018 across Greater Manchester. It is immediately apparent from the graphic that house prices are generally significantly higher to the south of the conurbation, most notably in Trafford, Stockport, parts of Manchester (notably around Didsbury) and rural areas on the extremities such as Saddleworth in Oldham. House prices are significantly lower in central areas of Bolton, Wigan, Rochdale, Salford, Oldham, East Manchester and Tameside.

7.106 We are concerned that the definition of Greater Manchester as a strategic HMA allows the GMSF to redistribute the housing need so that the southern/eastern authorities do not meet the full OAN for their areas. However, it is unclear how an over-provision of homes in the northern districts will help to meet the need for more homes in the south.

Figure 7.4 Median House Prices in Greater Manchester Year Ending June 2018



Source: Lichfields / ONS

7.107 To take the example of Trafford, the 2019 SHMA (Table 5.2) provides very clear evidence that the Borough has worsening market signals including escalating house prices and affordability issues. The 2019 SHMA recognises that the district experienced a growth in house prices of 35.2% for the period 2007 to 2017, which is the highest of all of the GM districts and is almost 11% higher than the national average for this period.

- 7.108 The GMSF shifts housing need from the south to the north of the Greater Manchester, away from the areas with the strongest housing pressures and worsening market signals, towards areas where the need for new homes is less pressing. So we have a situation whereby the 5 districts to the north and west (Rochdale, Bury, Bolton, Wigan, Salford), have an identified distribution of some 11% above their LHN, whilst the 5 districts to the south and east have a level of distribution 8% below their LHN.
- 7.109 As a result of this proposed distribution, the GMSF may contribute to a London-style housing crisis across South Manchester. London has for decades developed too few homes for its growing population. Insufficient housing numbers, of all types, have resulted in a situation where buying a home is no longer a realistic possibility for many Londoners, even those on an above average incomes. Rented properties across the City are also becoming increasingly unaffordable for those who rely on them, such as new graduates and those on low incomes. London also suffers from a lack of family housing which has pushed people who work in the City to live further afield, in places such as Milton Keynes and Reading, resulting in long commutes on overburdened roads and trains. The GMSF, as it stands, puts Greater Manchester at risk of making the same mistakes. Developing an insufficient number of family and affordable homes across the sub-region will push those who work in the city to live in surrounding areas such as Cheshire, Lancashire and Warrington, adding more cars to the North West's roads and public transport infrastructure; many of which are already at or close to capacity.

Migration Flows

- 7.110 The 2019 SHMA provides an analysis of migration and commuting data and comes to the following view:
- “Based upon the migration, commuting and house price evidence to some extent, as well as historically strong institutional relationships between authorities in the area, it is sensible to conclude that Greater Manchester forms a functional hma. Given the complexity of the housing and labour markets within Greater Manchester, together with the relatively small distances involved in most migration and commuting, the issues of district identity and the availability of population and household projection data, it is considered that the most appropriate unit of analysis below the Greater Manchester level is the individual districts, and this is the approach adopted in this SHMA”. [§2.39]*
- 7.111 The SHMA therefore considers Greater Manchester to be a single HMA, in which people are willing to move long distances to find a suitable home to live. This ignores the reality that many people want to stay in areas they are familiar with, around friends and family or where their children go to school. For example, national research²⁸ provides an indication of the average distance moved between a head of household's present and previous residential address and suggests that for market housing, almost 1 in 5 households move less than 1 mile to their new residence, whilst 70% move less than 10 miles. Tenants living in social housing generally move even shorter distances; 30% move less than a mile, whilst 87% move less than 10 miles to their new home. This means that in general, new housing supply should be provided as near as possible to where the need is likely to arise.
- 7.112 Inspectors have taken the view that SHMAs must be undertaken for the whole HMA and that objectively assessed housing needs should reflect such geographies.
- 7.113 HMAs are inherently difficult to define. They are a geographic representation of people's choices and preferences on the location of their home, accounting for where they want to live

²⁸ Source: DTLR 2007/08 Survey of English Housing - Tenure by Distance moved, Table S230

and work. They can be defined at varying geographical scales from the national scale, to sub-regional scale, down to local and settlement specific scales. HMAs are also not definitive. As well as a spatial hierarchy of different markets and sub-markets, they will inevitably overlap.

7.114 Previously, the CLG ‘*Identifying sub-regional housing market areas*’ advice note (March 2007) recommended that a measure of migration flow patterns can identify the geographical relationships of where people move house within an area with a 70% containment rate of migratory activity typically representing a HMA. In particular:

“The typical threshold for self-containment is around 70% of all movers in a given time period. This threshold applies to both the supply side (70% of all those moving out of a dwelling move within that same area) and the demand side (70% of all those moving into a dwelling have moved from that same area). Some areas maybe relatively more or less self-contained, and it may be desirable to explore different thresholds.”

7.115 This level of self-containment was also recommended in the previous PPG (March 2014). However, the PPG was revised in September 2018, removing the reference to 70% and instead stating that migration flow and housing search patterns “*can help identify the extent to which people move house within an area, in particular where **a relatively high proportion of short household moves are contained***” (Lichfields emphasis)²⁹.

7.116 The appropriateness of the 70% threshold is recognised in the 2019 SHMA:

“The use of migration data in the identification of housing market areas tends to focus on determining when self-containment levels reach a particular threshold. The threshold of 70% is deemed to be appropriate for this exercise, as it was the level referred to in the previous PPG dated March 2015. The data also helps to establish the levels of connectivity between places.

Migration data from the 2011 Census can be used to identify self-containment rates of districts, by examining the original addresses of those who moved into Greater Manchester from England and Wales in the year preceding the census”. [§2.6-2.7]

Figure 7.5 Proportion of moves to Greater Manchester Districts from England and Wales, 2011

Origin- moved from	Destination- moved to										
	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan	Greater Manchester
Bolton	73.0%	3.9%	0.5%	0.3%	0.5%	2.2%	0.4%	0.3%	0.7%	3.1%	7.4%
Bury	2.8%	63.7%	0.9%	1.0%	2.6%	2.7%	0.4%	0.6%	0.9%	0.3%	4.7%
Manchester	1.7%	6.5%	60.2%	4.8%	5.1%	10.6%	11.4%	6.7%	16.2%	1.2%	24.4%
Oldham	0.5%	1.0%	1.1%	75.2%	4.8%	0.8%	0.4%	3.3%	0.4%	0.3%	6.0%
Rochdale	0.6%	3.5%	0.8%	4.1%	72.3%	1.1%	0.5%	0.7%	0.6%	0.2%	5.9%
Salford	3.0%	4.1%	2.9%	0.7%	1.2%	54.5%	1.4%	1.1%	4.0%	2.5%	7.7%
Stockport	0.3%	0.4%	2.4%	0.3%	0.5%	1.0%	62.9%	4.8%	1.8%	0.3%	6.2%
Tameside	0.2%	0.7%	1.1%	3.4%	0.7%	1.1%	3.7%	71.1%	0.8%	0.2%	5.7%
Trafford	0.5%	1.0%	2.8%	0.3%	0.4%	3.2%	1.9%	0.6%	56.2%	0.4%	5.5%
Wigan	3.4%	0.5%	0.6%	0.2%	0.3%	2.2%	0.3%	0.3%	0.8%	74.4%	7.5%
Greater Manchester	86.0%	85.2%	73.3%	90.6%	88.5%	79.3%	83.3%	89.5%	82.4%	83.0%	81.1%
Rest of England and Wales	14.0%	14.8%	26.7%	9.4%	11.5%	20.7%	16.7%	10.5%	17.6%	17.0%	18.9%

Source: 2019 SHMA, Table 2.1 / Census 2011

²⁹ ID 61-010-20180913

7.117 Figure 7.5 is taken directly from Table 2.1 of the 2019 SHMA and measures levels of internal migration in Greater Manchester. On the basis of a 70% self-containment rate, the following districts would be self-contained HMAs:

- Bolton (73%)
- Oldham (75%)
- Rochdale (72%)
- Tameside (71%)
- Wigan (74%)

7.118 This trend of self-containment is acknowledged in the 2019 SHMA itself which states:

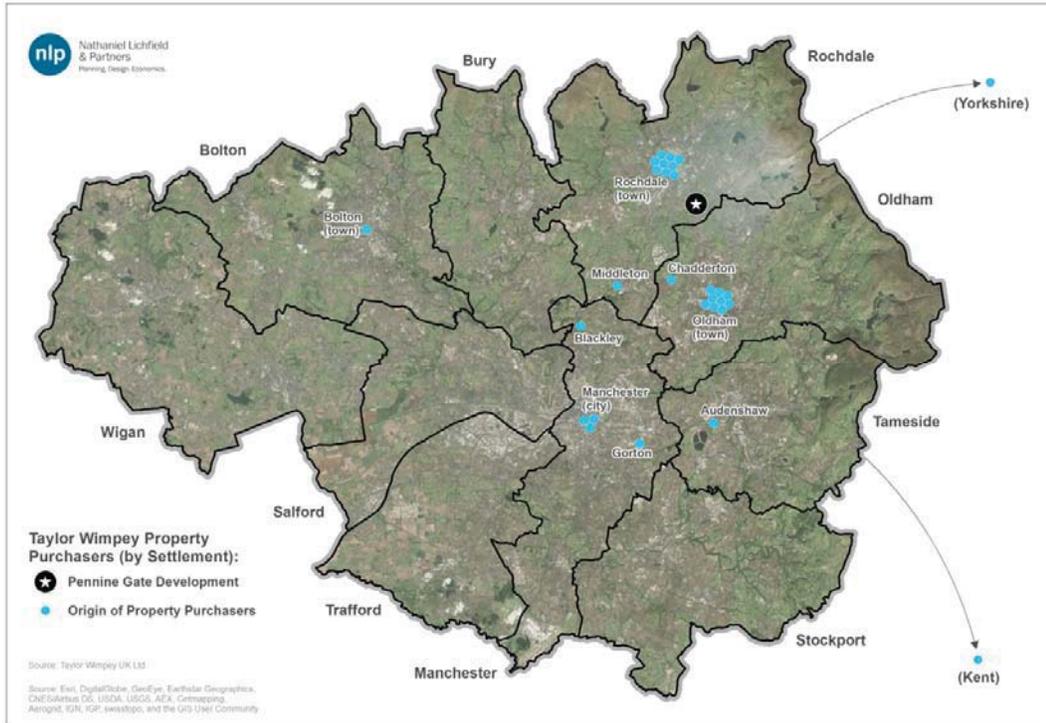
“Figure 2.1 shows that five of the ten Greater Manchester districts have self-containment rates below the 70% threshold and five have self-containment rates above. Broadly the northern districts of Greater Manchester (Oldham, Wigan, Bolton, Rochdale and Tameside) are more self-contained than those in the south (Stockport, Manchester, Trafford and Salford) with the notable exception of Bury”.

7.119 Furthermore, even for those areas with a lower level of self-containment, the migratory movements tend to be strongly influenced by proximity, hence there are comparatively few moves between the southern districts and the northern parts of the conurbation.

7.120 ‘Origin of Sales’ data provided by Taylor Wimpey for a number of their recent developments in Greater Manchester supports this ‘proximity principle’. This relates to the previous address of purchasers moving to Taylor Wimpey’s new Pennine Gate development, located on the outskirts of Rochdale. Figure 7.6 clearly demonstrates that nine of the 29 property purchasers identified moved from within Rochdale, with another moving from nearby Middleton (also in Rochdale Borough). A further 35% of the new occupiers moved from Oldham / Chadderton, just over the Rochdale Borough border. As for the remainder, 5 moved from Manchester City (17%), and just one from Bolton and another from Audenshaw (in Tameside Borough). The remaining two occupiers moved from further afield (Yorkshire and Kent).

7.121 This supports the 2011 Census data which indicates that the vast majority of moves are local ones, with proximity and familiarity of place being key decision-making drivers.

Figure 7.6 Taylor Wimpey Property Purchases in Greater Manchester – Previous Area of Origin



Source: Lichfields/Taylor Wimpey UK Limited

7.122 Evidence provided in the 2019 SHMA also suggests that there are significant levels of migration into Greater Manchester from outside the sub-region. For example:

- For Bury: 1.7% of residents moved from Rossendale which is more than moved into Bury from Wigan (1.5%), Stockport (0.4%), Oldham (1.0%)Tameside (0.7%) and Trafford (1.0%)
- For Manchester: 27% of residents moved to Manchester City from outside Greater Manchester which is more than twice as many as moved into Manchester from the other 9 GM authorities combined (13%);
- For Salford: a similar pattern to Manchester is shown; with 20% of moves into the City from outside GM;
- For Stockport: more people moved into the Borough from Cheshire East (3.6%) than any of the GM authorities with the exception of Manchester (11.4%) and Tameside (3.7%).
- For Trafford: more people moved into Trafford from Wales (1.0%) than from Wigan (0.8%), Bolton (0.7%), Oldham (0.4%), Rochdale (0.6%), Tameside (0.8%) and Bury (0.9%), let alone from nearby Cheshire East (1.7%).

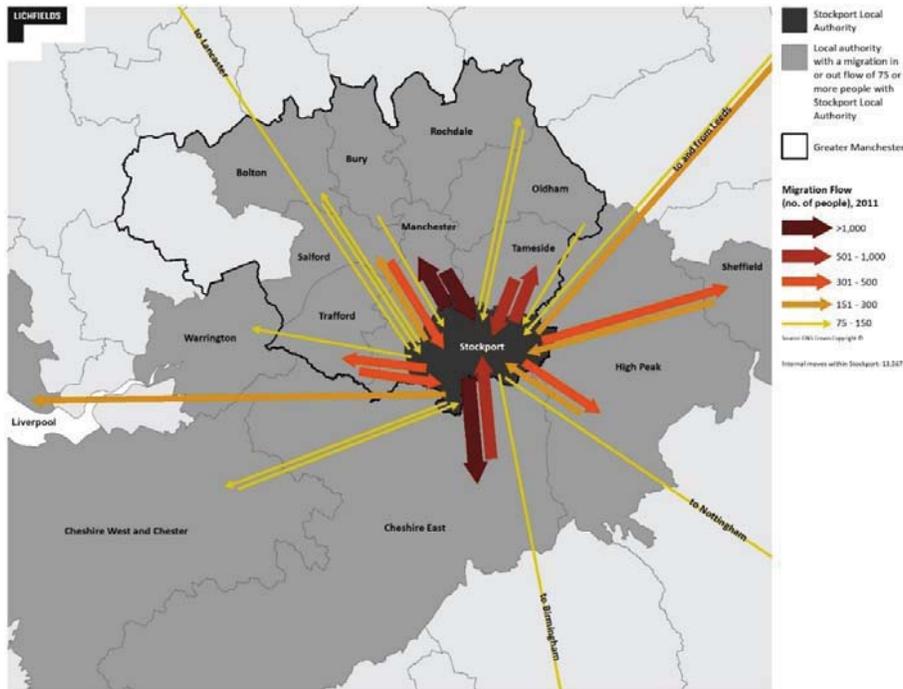
7.123 The migration data provided in Table 2.1 of the SHMA also suggests low levels of migration from the southern to the northern and western districts. For example:

- For Trafford: with the exception of neighbouring Salford, migration levels to the northern districts are low – Bolton (0.5%), Bury (1.0%), Rochdale (0.4%) and Wigan (0.4%).
- For Stockport: there is a similar pattern with the following levels of migration – Bolton (0.3%), Bury (0.4%), Rochdale (0.5%), Salford (1.0%) and Wigan (0.8%).

7.124 Taylor Wimpey therefore considers that it makes no sense to redistribute Stockport’s/Trafford’s needs to the northern districts, with whom they have very limited relationships.

7.125 Figure 7.7 clearly demonstrates how very few people move to/from Stockport and the northern districts such as Bury, Rochdale and Bolton. This is in stark contrast to the high numbers that move to/from Cheshire East, High Peak and even Sheffield.

Figure 7.7 Migration Patterns for Stockport Borough 2011



Source: Lichfields / 2011 Census

Travel to Work Areas

7.126 An analysis of commuting patterns also suggests that Greater Manchester does not function as a self-contained Functional Economic Market Area [FEMA] as claimed in the 2019 SHMA. For example, the borough of Wigan forms part of the Warrington and Wigan Travel to Work Area [TTWA] as defined by the ONS³⁰, whilst the Manchester TTWA incorporates a large proportion of Cheshire East and High Peak Boroughs.

Previous Strategic Housing Market Assessments

7.127 The conclusions drawn in the revised Draft GMSF contrast with the findings of SHMAs undertaken elsewhere in Greater Manchester, such as the Wigan SHMA (2015). This concluded that Wigan Borough represented a self-contained HMA in its own right with almost 80% of the Borough’s jobs occupied by Wigan residents, the highest rate in Greater Manchester. *“Based on recent evidence, it is considered that the administrative boundary of Wigan Borough provides a justifiable boundary for the Wigan housing market area.”*³¹

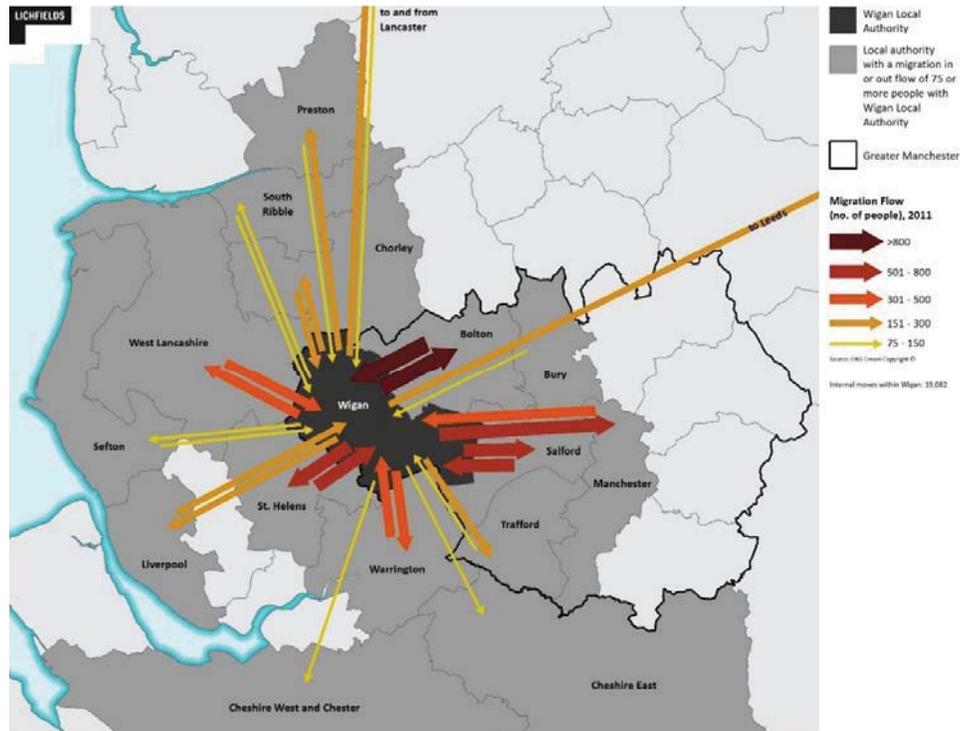
7.128 Figure 7.8 demonstrates the extent to which Wigan has migratory linkages with St Helens, West Lancashire and Warrington that are far stronger than any districts in Greater Manchester with the exceptions of Manchester City, Salford and Bolton. Indeed, it has little if any relationship with Bury, Oldham, Tameside, Rochdale and Stockport and therefore it is curious that the

³⁰ Office for National Statistics Travel to Work Areas 2011

³¹ Wigan SHMA (Draft October 2015) – Page 15

GMCA increases Wigan’s housing requirement at the expense of these southern/eastern authorities.

Figure 7.8 Migration Patterns for Wigan Borough 2011



Source: Lichfields / 2011 Census

7.129 We also note that the GMCA’s 2008 Greater Manchester SHMA identified four functional HMAs covering Greater Manchester, these being:

- 1 The Central HMA which formed the core of the conurbation incorporating the Regional Centre;
- 2 The North Eastern HMA, which included the districts of Oldham, Rochdale and Tameside, as well as the Moston and Blackley neighbourhoods of Manchester.
- 3 The Southern HMA which included the traditional ‘wealthier commuter’ authorities of Stockport and Trafford (with the exception of the Old Trafford area as well as the southern neighbourhoods of Manchester including Didsbury, Chorlton, Fallowfield, Withington, and Wythenshawe); and,
- 4 The North Western HMA which included the authorities of Bolton, Wigan and Bury, along with the Salford neighbourhoods which fell outside of the inner pathfinder areas.

7.130 There are also more recent examples which suggest that the identification of Greater Manchester as a single HMA is incorrect. For example, the 2015 Rochdale SHMA (which formed part of the evidence base for the adopted Rochdale Core Strategy), concluded that:

“... 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” [§7.5].

7.131 This conclusion was supported by the Local Plan Inspector who noted in his report:

“While HMAs may cut across local authority boundaries, in this instance and with the identified levels of internal migration, it was reasonable to conclude that the Borough is the relevant HMA for the CS, and in being so, it sits within the context of the larger Greater Manchester North East HMA” [§54].

7.132 **It is therefore clear that the structure of housing markets within Greater Manchester is complex and that it does not function as a single HMA as suggested in the 2019 SHMA. Subsequent iterations of the GMSF should therefore include lower level HMAs at District level, to understand housing need in specific areas. Further work is needed to define the spatial distribution that better reflects people’s needs.**

The Assumptions Underpinning the Existing Supply are Inconsistent

7.133 The manner in which the housing LHN has been distributed across the conurbation to generate a series of separate housing requirements is opaque. The GMSF [§7.9] states that the proposed distribution of development reflects the availability of suitable sites in each of the districts. It appears that the GMCA has simply taken the ‘existing supply’ of housing sites identified in SHLAAs undertaken individually for each Greater Manchester authority at face value, and assumed that every site will contribute to the forward supply. This is not only unlikely, but there is a lack of analysis to test whether the approaches undertaken to derive the deliverable / developable sites are consistent and robust across all ten authorities. From our own review of the SHLAAs currently available, there appear to be inconsistencies across the ten districts.

7.134 The way in which information on sites has been presented on the MappingGM system makes it extremely difficult to conduct a thorough assessment of the sites based on the illogical way the information is presented.

7.135 Taylor Wimpey has reviewed in detail the SHLAAs produced by Bury and Stockport to underpin the housing land supply as set out in Table 7.4 (Sources of housing land supply 2018-2037) of the GMSF. This review has highlighted significant issues with the claimed supply and Taylor Wimpey are of the opinion that both Council’s claimed supply is overstated and they have not demonstrated that there are reasonable prospects of a number of their sites being developed in the plan period. The Bury and Stockport SHLAA Review are appended (Appendix 1 and Appendix 2) to these representations and should be reviewed concurrently. Taylor Wimpey considers that both SHLAAs need significant revisions and additional allocations will be required to demonstrate that a sufficient supply of housing land is available to meet the housing requirement of the GMSF.

7.136 There are clearly very different housing markets operating across Greater Manchester. There is a very real danger that shifting supply from areas experiencing acute market stress at present, such as south Manchester, to areas with weaker housing markets further north could lead to worsening market signals and the need for further uplifts in housing delivery.

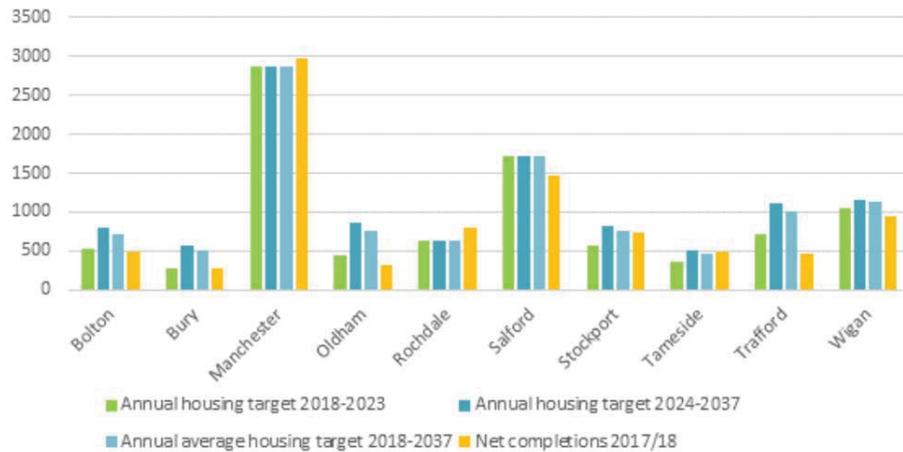
Phasing of New Housing in Greater Manchester

7.137 Taylor Wimpey notes that the revised draft GMSF has adopted a phased approach to delivering housing across the ten authorities. Table 7.3 of the GMSF seeks to backload the housing delivery towards the end of the plan period. Hence in the first 5 years of the plan from 2018-2023, just 9,200 homes would be delivered annually compared to 11,070 dpa between 2024 and 2037. Hence for Stockport for example, the first 5 years would see only 580 dpa, compared to 830 dpa after 2024. In other words, the GMCA proposes to backload delivery by lowering targets over the first 5 years and accelerate delivery in later years. Figure 7.9 presents this phasing in graphical format.

7.138

The GMSF notes that there is a need to build up to a higher future delivery rate in order to obtain Government funding as well as the required master-planning and infrastructure investments required to support development on the sites, including many of the allocations in the GMSF.

Figure 7.9 GMSF Annual Housing Targets



Source: Lichfields

7.139

As Figure 7.9 illustrates, this has had a particularly significant effect on Bolton, Bury, Oldham, Stockport and Trafford. Looking specifically at Bolton, the GMSF provides no housing allocations in the Borough and therefore the justification behind a phased approach here is unclear.

7.140

This suppression could assist in creating an illusion that these Greater Manchester authorities are demonstrating a five-year housing land supply, when in fact, they are knowingly underdelivering. The NPPF [§59] is clear that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The phasing approach taken in the GMSF will achieve the exact opposite of this by failing to deliver adequate levels of housing in the early years of the plan period. This shortage in supply will result in increased market pressures which are likely to lead to an increase in house prices which could hamper the delivery of much-needed affordable housing.

7.141

As noted above, the proposed phasing will also fail to deliver the ambitious Housing Deal for Greater Manchester which commits to delivering 227,200 homes between 2015/16 and 2034/35 and accelerate delivery rates to 12,375 homes per annum to 2026. It is therefore essential that the delivery of housing through the GMSF allows for the accelerated delivery rates in the Housing Deal to be delivered. The phasing of annual housing targets as currently proposed in the GMSF will fail to achieve this aim.

8.0 **Chapter Eleven: Proposed Additional Sites (Allocations)**

Question 78: Do you agree with the proposed policy GM Allocation 3: Kingsway South

- 8.1 Taylor Wimpey agrees with and supports the proposed policy GM Allocation 3 (Kingsway South) and has prepared a detailed site-specific representation in support of the draft allocation. The site-specific representation is appended to these representations at Appendix 3.
- 8.2 Taylor Wimpey controls part of the overall allocation fronting Broad lane and consider that it is wholly appropriate for the delivery of approximately 200 high quality residential properties on this key gateway into Rochdale. Taylor Wimpey has prepared a landscape-led masterplan for the Broad Lane site in conjunction with an overall concept masterplan for the wider Kingsway South allocation. Both masterplans have been prepared to align with the draft policy as set out in the GMSF. A detailed Development Statement has also been prepared for the Broad Lane site and contains the masterplan for the Broad Lane site, the concept masterplan for the Kingsway South allocation as well as a Vision for the residential development.
- 8.3 Taylor Wimpey supports the allocation of this site for a mixed-use development and considers that the element of land they control fronting Broad Lane is perfectly suited for residential development, can be delivered shortly after an allocation is secured and will create an attractive setting at this key gateway into Rochdale.

Question 111: Do you agree with the proposed policy GM Allocation 36: Gravel Bank Road/Unity Mill?

- 8.4 Taylor Wimpey agrees with and supports the proposed policy GM Allocation 36 (Gravel Bank Road/Unity Mill) and has prepared a detailed site-specific representation in support of the draft allocation. The site-specific representation is appended to these representations at Appendix 4 and should be read in conjunction with the overall representations.
- 8.5 Taylor Wimpey controls the majority of the proposed allocation at Gravel Bank Road/Unity Mill and has made contact with the owners of the Unity Mill site, who are also willing to bring their land holding forward, to develop a comprehensive development for the proposed allocation. Taylor Wimpey considers that it can deliver a high quality and attractive development at their Gravel Bank site which will provide an appropriate mix of market and affordable housing in accordance with a comprehensive masterplan.
- 8.6 Taylor Wimpey considers that the site no longer fulfils the purposes of including land in the Green Belt and there are no overriding technical constraints which would preclude the delivery of residential properties on this site.
- 8.7 Taylor Wimpey has previously prepared and submitted a Development Statement for their element of the overall site and consider that the masterplan within the Development Statement continues to be appropriate and deliverable taking into account the characteristics of the site.
- 8.8 Taylor Wimpey therefore supports the allocation of this site and is willing to work with the owners of the Unity Mill site to deliver a comprehensive masterplan for the site. Taylor Wimpey considers that the site is deliverable and an application for residential development would be prepared and submitted shortly after an allocation is secured.

9.0 **Chapter Twelve: Delivering the Plan**

Question 127: Do you agree with the proposed policy on Infrastructure Implementation?

- 9.1 Taylor Wimpey understands the importance of infrastructure implementation and supports the principles as set out in Policy GM-D 1 (Infrastructure Implementation). Ensuring a collaborative and synchronised approach to investment in infrastructure and services is vitally important if the required level of growth is to be delivered across the city region during the plan period in a sustainable and coherent way. GMCA needs to ensure that effective modes of communication are put in place and the key infrastructure and service providers adopt a collaborative approach to ensure development is not halted unnecessarily due to infrastructure capacity and constraints.
- 9.2 Part 3 of the Policy sets out that there is a new long-term funding mechanism for transport infrastructure to ensure timely delivery and capture of developer contributions. Taylor Wimpey is supportive of an approach that secures proportionate contributions to infrastructure associated with the delivery of development, but GMCA needs to be mindful of the current restriction on the pooling of S.106 obligations. Although it has been suggested that the restriction could be lifted or a Strategic Infrastructure Tariff could be introduced, neither are currently in effect and as such the next version of the GMSF needs to be mindful of this.
- 9.3 Part 4 of the Policy encourages early dialogue between developers and infrastructure providers to identify infrastructure requirements associated with developments. Taylor Wimpey agrees with the principle of early and meaningful engagement but additional information is required to inform the next iteration of the GMSF and the likely infrastructure requirements for each of the strategic allocations. Without this information, a detailed Viability Assessment cannot be undertaken to demonstrate that the strategic allocations are viable when considered in conjunction with the policy requirements as set out in the GMSF.

Question 128: Do you agree with the proposed policy on Developer Contribution?

- 9.4 Policy GM-D 2 (Developer Contributions) sets out that developers will be required to provide or contribute towards the provision of mitigation measures to make developments acceptable in planning terms.
- 9.5 Taylor Wimpey supports the principle of proportionate contributions towards requisite infrastructure improvements associated with development. However, it is imperative that a robust and detailed Viability Assessment is conducted to inform the next iteration of the GMSF. Without this work being completed to inform the GMSF, there is no way of testing and ensuring the draft allocations as proposed in the GMSF are deliverable.
- 9.6 Although Taylor Wimpey supports the inclusion of a policy relating to the submission of viability assessments with planning applications, the GMSF needs to be drafted to ensure this is the exception rather than the rule. Policy requirements need to be drafted appropriately with viability testing having been undertaken prior to the release of the submission version of the GMSF.

10.0 Conclusion

10.1 Taylor Wimpey welcomes the release of this iteration of the GMSF and the work that has taken place in its preparation. Taylor Wimpey are committed to working collaboratively with each of the authorities in which they have land assets and the GMCA overall to ensure a sound plan can be delivered.

10.2 At present, Taylor Wimpey has a number of concerns in relation to the content of the draft GMSF and associated evidence base. It is considered that all these concerns need to be appropriately addressed before the GMSF can be found sound at Examination.

10.3 These representations seek to critique the approach taken in identifying the development needs for Greater Manchester and the overall spatial strategy of the GMSF. These representations have focused primarily on housing related matters and seek to respond to all housing related questions in the GMSF consultation.

10.4 In summary, Taylor Wimpey's main concerns in relation to this iteration of the GMSF are:

- 1 **10,578 dpa is insufficient to meet housing needs:** the 10,578 dpa target derived from the standard methodology represents the minimum starting point. The Practice Guide³² states that an uplift should be applied where funding is in place to promote and facilitate growth (e.g. GM's £68m housing deal package that, if agreed, would commit GMCA to delivering 227,200 homes over the next 20 years as per the previous GMSF draft³³, a figure 7% above the current annual target). We are aware that MHCLG has written to the GMCA and has raised concerns about deviating below the agreed housing requirement. MHCLG has threatened to withdraw the housing package including the £50m fund to prepare brownfield land for development.
- 2 **Phasing concerns:** The GMSF proposes to lower targets over the first 5 years to just 9,200 dpa (13% below the LHN). This conflicts with the Government's aspiration to frontload housing delivery by factoring in a buffer of additional deliverable sites, brought forward from later in the plan period [§73].
- 3 **Unrealistic density targets:** Policy GM-H-4 of the GMSF proposes stringent housing densities to be applied reflecting the relative accessibility of sites. This approach is geared towards delivering high density apartment schemes in Manchester City and Salford and reducing the need for Green Belt release. Target densities on these urban sites are not achievable, are unrealistic and evidence suggests that they far exceed any densities previously secured in Greater Manchester
- 4 **No formal Green Belt Review:** Despite proposing 2,419 ha of Green Belt land for release, the GMSF has relied upon the findings of a Green Belt Assessment³⁴ rather than a Review. In accordance with §139 of the Framework, the GMSF should identify areas of safeguarded land in order to meet longer term needs stretching well beyond 2037. A formal Green Belt review should be undertaken to ensure that national policy is adhered to and to avoid the GMSF being found unsound at Examination. Such a review, if properly conducted is also likely to find that sites dismissed as potential allocations due to Green Belt functionality issues, would be considered suitable for release.

³² 2a-010-20180913

³³ GMCA (5th June 2018): Planning, Housing and Environment Overview and Scrutiny Committee, Greater Manchester Housing Package

³⁴ LUC (July 2016): Greater Manchester Green Belt Assessment

- 5 **Greater Manchester is not a single Housing Market Area [HMA]:** The GMCA assumes that a single HMA operates across the whole of GM, which justifies a redistribution of the overall housing allocation towards the central and northern districts and away from the more affluent south [§7.8]. Detailed reasoning and evidence to justify the claimed position that Greater Manchester operates as one HMA has not been provided to justify the divergence away from the previously claimed position.
- 6 **No Site Selection Methodology:** §11.6 of the GMSF 2019 states that sites have been identified to reflect the overall spatial approach "with the aim of making the most of existing locations and assets whilst providing opportunities across Greater Manchester that help address current disparities". However, the list of potential allocations is arbitrary and does not follow a logical methodology. Taylor Wimpey has serious concerns with the site selection process and consider that it is not robust and will not stand up to scrutiny at examination.
- 7 **Deliverability concerns:** The GMSF's strategy of focusing development on high-density Previously Developed Land [PDL] sites in central locations, and focusing a handful of large Green Belt allocations towards the more deprived northern districts, increases the risk that sites will not come forward as planned. Complex, high density PDL sites tend to have higher exceptional upfront costs and longer lead-in times, whilst there has been a clear glut in recent years of apartment blocks for young professionals and students which may or may not continue into the future.
- 8 **Failure to provide an appropriate mix, size and type of housing:** The GMSF focuses on delivering high density homes (43% in Manchester City and Salford), many of which will comprise 1 / 2-bed apartments targeting a niche market and not bearing in mind the actual needs of Greater Manchester or the ability to meet the requirement for 50,000 affordable homes to be delivered. Finally, limited provision is made in the GMSF to meet the needs for specialist housing including elderly provision and student accommodation.
- 9 **Ignoring the housing affordability crisis:** the GMSF fails to take affordability issues into account. It notes that if insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation to meet their needs [§7.4]. However, the GMSF ignores the point by cutting housing targets in the most unaffordable parts of GM - Stockport and Trafford (with the latter experiencing house prices 8.9-times earnings).
- 10 **Affordable housing:** There is no analysis of affordable housing needs at all in the GMSF, without which it is impossible to ascertain whether a further uplift to the LHN is required. The 'aim' to deliver 50,000 affordable homes (2,632 annually) is more than double the 1,211 affordable homes currently being delivered across GM.
- 11 **Consistency of Evidence Base:** Taylor Wimpey is disappointed with the inconsistent nature of the evidence base which has been released to underpin the GMSF. In particular, the SHLAAs produced by the 10 authorities do not follow a consistent approach or methodology. The conclusions of each SHLAA inform the quantum of brownfield land developable over the plan period and consequently informs the level of Green Belt land required to meet the housing and employment land needs of Greater Manchester.

Appendix 1 Stockport SHLAA

Stockport SHLAA (2018) Review

1.0 Introduction

- 1.1 The Greater Manchester Spatial Framework [GMSF] is being produced by all 10 Greater Manchester Councils working together in partnership. It seeks to ensure that the right land is available in the right places to deliver the homes and jobs needed up to 2037, and will identify the new infrastructure such as transport, schools, health centres and utility networks required to achieve this. The GMSF will set the overall housing figure for Stockport, superseding the figure in the Core Strategy, and will identify provide large-scale housing allocations where necessary to help deliver this target.
- 1.2 This Review of the Stockport SHLAA has been undertaken on behalf of a consortium of housebuilders, namely: Taylor Wimpey, Russell Homes and Bellway Homes (the Consortium). All three housebuilders have land interests in Stockport and are active in the delivering homes across the Manchester city-region. As such, the content of this SHLAA Review is informed by each housebuilder's local knowledge of the housing market in Stockport.
- 1.3 The Consortium acknowledges that each local authority across Greater Manchester has undertaken an exercise to update their own land availability assessment and the findings of each have been collated together at the Greater Manchester level to inform ongoing work on the GMSF. However, not all authorities have produced and published formal SHLAAs to inform the process.
- 1.4 For Stockport, the SHLAA claims that the Council has a developable supply over the plan period of 11,774 units. This supply is made up of: sites under construction (2,174); sites with extant permission (1,104); SHLAA sites (7,726); and, small sites windfall allowance (770).
- 1.5 The Consortium has reviewed the Stockport SHLAA and has a number of concerns in relation to the robustness of the claimed supply. The importance of having a robust and realistic SHLAA is paramount given that the findings of the SHLAA underpin and seek to justify the Council's claimed housing land supply. Conversely, the amount of land to be allocated for housing (and other uses) in Stockport will be based on the difference between the claimed supply and the housing requirement.
- 1.6 This Note assesses the Stockport SHLAA and seeks to outline the key areas of concern which will need to be appropriately addressed before the Submission version of the GMSF is released.

2.0 Policy Context

National Planning Policy Framework

- 2.1 The Framework sets out that the planning system should be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area [§15]. In terms of housing, the Framework seeks to support the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed [§59].
- 2.2 The Framework [§67] goes on to note that:

“Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan period; and*
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possibly, for years 11-15 of the plan”*

2.3 Annex 2 of the Framework seeks to define the terms ‘deliverable’ and ‘developable’. For a site to be included in a SHLAA, it must be considered developable, which is defined as:

“To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged”.

2.4 In terms of windfalls, the Framework [§70] sets out that where an allowance is to be made for windfall sites as part of anticipated supply, *‘there should be compelling evidence that they will prove a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.’*

National Planning Practice Guidance

2.5 The National Planning Practice Guidance [ID: 3-001-20140306] sets out that the assessment of land availability is an important step in the preparation of Local Plans.

2.6 The Practice Guidance states that:

"An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the Strategic Housing Land Availability Assessment requirement as set out in the National Planning Policy Framework."

2.7 It notes that the assessment should include:

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

2.8 The Practice Guidance [ID: 3-002-20140306] stipulates:

"The assessment forms a key component of the evidence base to underpin policies in development plans for housing and economic development, including supporting the delivery of land to meet identified need to these uses."

3.0 Methodological Concerns

3.1 At the outset and as a general point, The Consortium would like to express their concern in relation to the inconsistency of approach adopted by all 10 Greater Manchester authorities in forming their evidence base, and in particular their SHLAAs. The methodologies of all ten

SHLAAs vary considerably as is acknowledged in the Housing Topic Paper (Appendix 1, para 3.1.3). Given the importance of the SHLAAs and the reliance placed upon them to justify the quantum of brownfield land available, this constitutes a flawed approach. It is disappointing as all 10 authorities have been working together for over 2 years to prepare this iteration of the GMSF and a consistent evidence base should have been released.

- 3.2 The Consortium has a number of concerns in relation to the methodology adopted by Stockport in preparing their SHLAA and details of the concerns are set out in more detail below. The Consortium accepts that undertaking a detailed Call for Sites exercise, as undertaken by the Council in 2017, is a useful evidence gathering exercise and understands that workshops have also taken place. However, it would appear that developers active in the Stockport market (i.e. Taylor Wimpey, Russell Homes and Bellway Homes) were not invited to these workshops which is disappointing given their experience of delivering housing in Stockport and their consequent in-depth experience of the local housing market.
- 3.3 As a general point, very little evidence has been presented in the Council's SHLAA to justify the assumptions used, including those relating to:
- 1 Potential Yield from sites;
 - 2 Lead-in-Times; and
 - 3 Small Sites Allowance.
- 3.4 It is difficult to determine how achievable or realistic each assumption is without the appropriate level of evidence being presented. As a result, the Consortium considers that the SHLAA is not sufficiently transparent and additional evidence is required to be published. These assumptions are considered in more detail below.

Potential Yield

- 3.5 In terms of potential yield from sites, the Council's SHLAA (Figure 3.2 gross/net developable area assumptions) sets out that on sites over 2ha, the net developable area will comprise 75% of the overall site. Having reviewed the adopted Stockport policy requirements and the emerging policy requirements as set out in the GMSF, the Consortium is concerned that a 75% net developable area is ambitious when landscaping, open space/play space, Sustainable Urban Drainage, infrastructure and service provision is included within a development site, particularly sites on the edge of settlement boundaries. Where it may be reasonably justified that substantial boundary landscaping will be required or where more suburban housing layouts may be built, lower net developable areas will be generated.
- 3.6 The purpose of the SHLAA is not to artificially inflate the delivery potential of a site and a realistic approach should be applied. As such, the Consortium would advocate a 70% net developable area is applied to all sites over 2ha. Finally, the local authority has not provided evidence to justify that 75% is a reasonable and achievable assumption in Stockport.

Lead in Times

- 3.7 The SHLAA (Figure 3.3 - Typical lead in times for sites delivering dwellings) sets out the anticipated lead in times for sites with full planning permission, outline planning permission and without planning permission. The Consortium considers that the lead in times are appropriate for smaller sites but a separate category within the SHLAA should be included for sites with a capacity of over 200 units.

- 3.8 Larger sites often take longer to secure planning permission for a variety of reasons (more complex technical issues, highway capacity and improvements, infrastructure upgrades required, complex S.106 issues etc) and can take longer to commence delivery of units (off-site highway works, other infrastructure upgrades etc). As such, a realistic stance should be adopted by the local authority. The neighbouring authority to the south of Stockport is Cheshire East and in their most recent SHLAA, which underpinned their adopted Local Plan and subject to scrutiny at Examination, they divide lead in times into three categories based on site size with smaller sites delivering units faster. Within their SHLAA, sites with a capacity of 200+ units: and have planning permission take 2 years to commence delivery; sites with outline permission take 2.5 years and sites without permission take 3.5 years. The Consortium considers that Stockport should adopt a similar stance given the similarities between the market areas unless specific evidence is available and presented to demonstrate otherwise.

Small Sites

- 3.9 The SHLAA makes an annual allowance of 55dpa on small sites from year 6. The Council set out their justification for this allowance based on past completions on small sites (less than 5 units) over the past 5 years. Although 55dpa is the average across the past 5 years, there was a marked decline on the number of units being delivered on small sites in the last monitoring year (2017/18) with only 23 units being delivered. This must also be set in the context that Stockport experienced their highest annual net completion over the past 5 years in 2017/18 and the number delivered on small sites equated to just 3% of the overall delivery.
- 3.10 As strategic sites commence delivering units and the Council starts delivering units in accordance with the Town Centre Living Strategy, the number of units being delivered on small sites may decline. As such, the Consortium would advocate an approach to apportioning a small site allowance within the SHLAA which recognises that small sites are a finite resource within the existing urban area and the contribution to overalls supply from this source will diminish. The Consortium would advocate a reduction in the Council claimed supply over the plan period from 770 units to 546 units based on annual delivery of 39dpa which is the mid-way point between last year's delivery and the 5-year average.

4.0 Town Centre Living Allowance

- 4.1 Stockport Council has set out a commitment to facilitate '*a high quality residential renaissance in the town*'. Stockport Council is also working in partnership with Greater Manchester Combined Authority to bring forward Greater Manchester's first Mayoral Development Corporation (MDC). It is envisaged that the MDC will help accelerate the transformation of the area to the west of the town centre, '*creating a new urban village of up to 3,000 homes*'.
- 4.2 SHLAA Figure 4.2 (Stockport's housing land supply) sets out that Stockport's supply over the period to 2037 is 11,774 units, of which 3,521 units are anticipated to be delivered in the Town Centre. This equates to 30% of Stockport's overall supply over the plan period being delivered on sites within the town centre, which have thus far only been identified as a '*Broad Location*' rather than identifying specific sites for assessment.
- 4.3 The Consortium commends the Council's overall aspiration of redeveloping Stockport Town Centre and delivering higher density development in a sustainable location. However, the Council's aspirations must also be founded on a sense of commercial realism and the Consortium questions the potential of delivering 30% of Stockport's overall supply in this location over the next 15 years.

- 4.4 It is difficult to understand how the Council has derived a developable supply of 3,521 units in the town centre. The SHLAA does not provide a reasoned explanation of how the Council has derived this claimed supply. Furthermore, there is no justification provided in the SHLAA, or another evidence base document, which demonstrates that there are reasonable prospects that the claimed supply will be available and viable as envisaged and as required by National Policy.
- 4.5 The Consortium has reviewed the Stockport Town Centre Living Development Framework (May 2018) [STCLDF] which appears to be the only publicly available document which provides information on the Council's claimed delivery from Stockport Town Centre. The document indicates that the town centre has a capacity of 4,000-6,000 homes, but also states: *however, this requires intervention to accelerate the programme of delivery*'. It is not clear how this capacity (4,000-6,000) has been derived or how the Council has concluded that 3,521 can be delivered in the plan period.
- 4.6 The STCLDF sets out an area analysis by applying varying development densities to a number of specific areas within central Stockport. The evidence presented with the STCLDF is limited and does not justify the proposed density assumptions or identify specific sites. Of particular concern are the densities being applied to apartments in the Covent Garden Village (*c.150 houses per acre*) and similar densities on sites in Stockport Central. Furthermore, the analysis indicates that 1,500-2,700 homes *'could be accommodated on sites which are constrained'*. The proposed density of 150 houses per acre or 360 units per hectare is considered to be wholly inappropriate for the central Stockport area, wholly out of character with the surroundings, unviable for developers and likely to be unattractive to the market in the town. Finally, it is not clear if the Council has fully considered the implications and time delays which would be caused by the Compulsory Purchase process and the knock-on consequences in terms of delivery of sites in the town centre.
- 4.7 The Practice Guidance [ID: 3-019-20140306] sets out the factors which need to be considered when determining the suitability of the site. This includes the *'appropriateness and likely market attractiveness for the type of development proposed'*. Although the delivery of a quantum of development in Stockport Town Centre will be appropriate and attractive to the market, it is unlikely that more than 3,500 units being delivered over the plan period in this location at a high density will be appropriate, attractive to the market or meet the actual housing mix needs of Stockport over the plan period. The vast majority of the units delivered in the town centre are likely to be 1 and 2 bed properties which will not meet the actual needs for family housing, elderly accommodation and affordable units. It will saturate the market with one type of property and will be primarily delivered by developers and investors focused on the Private Rented Sector and as such there will be limited opportunity for private individuals to purchase properties.
- 4.8 To put these proposed densities in context, the Manchester SHLAA (2010)¹ set out that *'average densities for completed units have varied between 82 and 96 units per hectare over the last four years'* [§7.16]. The densities being advocated in Stockport are three to four times the density that was being delivered in Manchester City in 2006-2010, which has seen a significant level of its housing supply delivered in the form of city centre apartments and no evidence is provided which demonstrates that 360dph is deliverable, viable or desirable in the central Stockport market.

¹ The latest SHLAA available for Manchester at the time of writing dates back to 2010.

- 4.9 Setting aside the questionable densities being proposed for apartments in areas within the town centre, the identification of 30% of the Council's overall supply on sites within the town centre does not take into account the type and location of demand for houses in Stockport. 30% of the overall supply is a significant proportion and could result in homogenisation of the supply towards smaller units in Stockport which would affect their deliverability. Furthermore, it would appear that very little work has been undertaken on the viability, marketability and deliverability of delivering 200+ new units annually in Stockport Town Centre.
- 4.10 Coupled with this, the latest SHMA produced for Stockport (SHMA 2015) sets out that '*development more reflective of household expectation would result in an increased emphasis on developing larger detached family houses along with smaller bungalows*'. Furthermore, Table ES2 (Open market dwelling stock and preferences) sets out that flats/apartments comprise 8% of the current housing stock in Stockport but only 5.2% of people's preference was for this type of property. This again demonstrates that there is a serious mismatch between people's aspirations and the type of prevailing properties being put forward in the plan.
- 4.11 The Consortium considers that the establishment of the Mayoral Development Corporation for Stockport is a positive initiative for the delivery of housing in Stockport. However, to become an effective tool to act as a catalyst for housing delivery, significant capital investment will be required to fund development and acquire land. It is not clear how the MDC will be funded and even if capital funding sources are secured, it is likely to take a significant number of years to start delivering units at the numbers being envisaged in the GMSF from this housing source.
- 4.12 It is also worth mentioning that a recent survey in 2017 (Greater Manchester Housing Survey) suggested that 80% of the respondents wanted to own their own property in the suburbs and 84% were seeking a home with a private garden. Just 8% of respondents wanted to live in an apartment in the city centre. As such, the delivery of a significant proportion of the Council's supply in the town centre in the form of small apartments does not correspond to the demand in Greater Manchester and the Council has not produced robust evidence which would indicate that this supply will meet existing and future needs.
- 4.13 Finally, the STCLDF indicates that there are current issues with a shortfall of health services, open space and educational facilities in the town centre. The delivery of 3,521 additional units over the plan period will put considerable strain on the already stretched services and significant investment will be required to increase capacity. It is not clear how this will be funded and in particular how sufficient open space will be found to accommodate the increased needs of the population. Section 5 of the STCLDF calculates that between 25.52ha and 42.54ha of open space will be required to meet the needs generated by an additional 3,000-5,000 new dwellings in the town centre.
- 4.14 A similar situation arose in Cardiff when the Council submitted its LDP to the Welsh Assembly for Examination in 2009. Cardiff City Council prepared a plan with a heavy reliance on the delivery of smaller units and apartments on brownfield sites, particularly in the Cardiff Bay area, to meet its housing requirement. The Council proposed to deliver its housing requirement (27,442 units) within the urban area and no new housing sites outwith the existing settlement boundary were allocated.
- 4.15 At the outset, the Inspector Examining the Plan set out in his Note of Exploratory Meeting² that he had reservations about the LDP's reliance on windfall sites, almost 1/3 of the supply. He also set out that the strategy *lacks flexibility to deal with the failure of sites listed in the LDP to*

² Cardiff Deposit Local Development Plan 2006-2021, Exploratory Meeting – Note of Exploratory Meeting

come forward, if they are re-planned to lower densities or if brownfield land does not come forward as the LDP expects.

- 4.16 Furthermore, in terms of the housing mix being proposed in the LDP, the Inspector concluded that *'as evidenced by the preponderance of flats in committed schemes the market in recent years at least, has failed to meet the need for family housing ... without intervention by way of allocations and a policy to require family housing in appropriate circumstances, we cannot see how the identified need will be met'*. The Consortium considers that Stockport Council should pay particular heed to the mistakes made by Cardiff City Council in their overreliance on windfall sites coming forward to meet their needs. Significant deliverability concerns exist as well as concerns in relation to the mix and type of property being provided.
- 4.17 In conclusion, the Consortium considers that there is considerable merit in promoting regeneration of parts of Stockport Town Centre and delivering units in the town centre. However, the Consortium considers that the Council has not provided sufficient information to justify the inclusion of 3,521 units as being developable over the plan period. This is a significant proportion of the Council's overall supply and any delivery issues could fundamentally undermine the aspirations of the GMSF. Furthermore, there is no evidence to demonstrate that the proposed mix of dwellings will meet the needs and aspirations of people in Stockport. As such, there seems to be a focus by Stockport to deliver solely on 'units' at the expense of a strategy that achieves the right housing need figure, at the right locations to create quality family homes and communities, whilst addressing affordability issues across the Borough. A more realistic and balanced approach is required, that brings forward additional suitable Green Belt sites forward for development, with place making at its heart, to the benefit of generations to come.

5.0 Overall Supply

- 5.1 In general, the Consortium has concerns with regard to the general composition of the Council's claimed supply. For the reasons set out above, the Consortium considers that the supply that is developable from the town centre '*Broad Location*' is significantly overstated and it is highly unlikely that this level of development at the densities proposed will be delivered.
- 5.2 Secondly, a significant proportion of the Council's supply is derived from the loss of existing employment sites and proposed conversion of former mill buildings. There are a number of overarching concerns with this approach. In particular, the consortium is concerned that a large proportion of the Council's existing employment sites are proposed to be lost over the plan period. Some of these sites are not fit for employment purposes but a number of the sites proposed for redevelopment scored highly in the Council's most recent Employment Land Review.
- 5.3 Furthermore, the majority of the units being proposed on the former employment sites and mill conversions are apartment type units which, when coupled with the large town centre allowance, is likely to deliver primarily apartment type developments. As pointed out in the Council's most recent SHMA (2015), the majority of people in Stockport aspire to live in houses and not apartments. The supply set out in the Council's SHLAA will not cater for this need. There is significant tension between the two elements of the evidence base (SHMA and SHLAA).
- 5.4 Policies AED3, AED4 and AED6 of the Council's Core Strategy (2011) all seek to protect existing employment sites in Employment Areas, Rural Areas and sites outside Protected Employment Areas. Furthermore, the objectives of the GMSF itself (Objective 3) seeks a thriving and productive economy in all parts of Greater Manchester by ensuring *'there is adequate*

development land to meet our employment needs'. As such, the inclusion of a significant number of existing employment sites for redevelopment to meet the housing need will help to meet Objective 1 of the GMSF (Meet our Housing Need) but conflicts with adopted planning policy in Stockport and Objective 3 of the emerging GMSF.

- 5.5 The Consortium has also reviewed the composition of the Council's housing land supply and notes that the majority of the Council's supply is derived from sites of less than 10 units. In total, the Council's claimed supply is made up of 440 sites with 296 (67%) of these sites having a capacity of less than 1-9 units. A further 76 sites have a capacity of less than 25 units (17%). In total, 74% of the sites making up the claimed Council's supply have a capacity of less than 25 units. As such, the speed of delivery is likely to be slowed than what can be achieved on larger sites and the type of properties being provided is likely to be of a similar composition. Furthermore, there is only a finite number of small house builders active in the city-region market and the quantum of small sites being put forward by the Council is undeliverable. An overreliance on small housebuilders will not significantly increase the supply of houses and respond positively to the national housing crisis.

6.0 Site Analysis

- 6.1 The Consortium has conducted an analysis of all sites with an indicative capacity of at least 40 units to assess the robustness of the Council's claimed developable supply. In total, aside from the Town Centre Living Allowance, which has already been discussed, there are 33 sites with a capacity to deliver 40 units or more in the Stockport SHLAA. Given the large number of sites contained within the Council's SHLAA, it was considered that selecting all sites over 40 units was a reasonable threshold to set and would provide a reasonable indicator of the robustness of the sites contained within the SHLAA overall.
- 6.2 The analysis of these sites involved a desktop appraisal of each site reviewing its designation, previous planning history; surrounding land uses and its suitability and sustainability as a residential site. The desktop assessment also considered environmental, physical, infrastructure and any other obvious constraints which would affect the developability of the site. Following the desktop assessment, a site visit was undertaken for sites over 100 units to validate any obvious concerns and identify any other issues which may not have appeared during the desktop exercise.
- 6.3 As a result of the analysis undertaken, the Consortium would question the developability of 11 of the 33 sites with a capacity of 40 units+ included within the SHLAA. It is considered that the claimed supply on these sites is being overstated and the Council has not provided sufficient evidence to demonstrate that there is a *'reasonable prospect'* that the sites will come forward as envisaged.
- 6.4 Reasoned justification of our concerns with each site is set out in more detail below.

Factories at Compstall Village, Andrew Street, Romiley (SHLAA Ref: SKH17067)

- 6.5 The Stockport SHLAA sets out that the site known as Factories at Compstall Village has a site area of 3.33ha and can deliver 160 units at a gross density of 48dph. It is envisaged that this brownfield site will deliver 60 units in years 6-10 and a further 100 units in years 11-15. The site currently comprises a series of former mill buildings, some of which are in continued employment use whilst a number of others appear derelict. At least one of the units is currently being actively marketed for employment uses.

- 6.6 Stockport's ELR (§3.38) outlines that *Compstall Mills, Railway Road and Westwood Trading Estate represent the areas key employment areas*, thus outlining the importance of the site to the local economy. Aside from possible land assembly issues associated with two separate ownerships, a proportion of the site (approx. 25%) is located in Flood Zone 3 and not suitable for residential development. Therefore, in order to deliver 160 units at the site, the proposed density would need to increase to c.65dph. This density is not considered to be appropriate in this location given the surrounding context including that the site is located within a Conservation Area and the village of Compstall is washed over by Green Belt. The Council has not provided robust information to demonstrate their assumptions are reasonable.
- 6.7 The Consortium is also concerned about the Council's assumed gross density of 48dph. Given the site's characteristics, principally its elongated nature with many large mature trees through the site, achieving an efficient layout to deliver this density will be difficult. The consortium is also concerned that little or no thought has been put into how other uses such as play space and sustainable urban drainage can be factored in at this density.
- 6.8 The site also has a relevant planning history with outline planning permission being granted in May 2013 for the partial demolition and redevelopment of the Compstall Mill Estate to provide a mixed-use development comprising 121 residential units and commercial premises as well as other associated land uses (LPA Ref: DC/042235). The developer of the scheme was Ask Property Developments and it would appear that none of the pre-commencement conditions were discharged and the permission has expired.
- 6.9 The 121 residential units comprised 90 apartments and 31 houses and it is not clear why the development has not come forward. However, the reports accompanying the planning application, in particular the Geo-Environmental Report, set out that the site has a number of geo-environmental constraints, which would need further assessment and consideration. It is not clear if this was the reason why the development has not come forward but in any event the cost of remediation of this site in the future are likely to be significant. The housing market at the time of the grant of permission was relatively buoyant so this should not have been a contributing factor in the non-implementation of the permission.

Conclusion

- 6.10 The Consortium considers that the site has potential to deliver some units over the course of the plan period but it is not clear how the Council has derived a capacity of 160 units and the Consortium does not consider that this level of development in the small village of Compstall is realistic or developable.
- 6.11 As such, a significant proportion of the claimed supply from this site should be discounted and the Council's delivery assumption is not robust.

Former Cheadle Brickwork Site, Adswold Road, Cheadle Hulme (SHLAA Ref: SKH17079)

- 6.12 The Stockport SHLAA sets out that the site known as Former Cheadle Brickwork has a site area of 9.33ha and can deliver 160 units at a gross density of 17.15dph. It is envisaged that this brownfield site will deliver 120 units in years 6-10, and a further 40 units in years 11-15. The site is in active use a recycling facility and is currently occupied by Booth Ventures Ltd (Waste Management and Aggregate Production).

- 6.13 The site is identified within the Stockport UDP as an Employment Area (Policy E3.1 – Protection of Employment Areas), which sets out that development involving business and light industry (B1), general industry (B2) or warehousing (B8) will be permitted and proposals involving housing are likely to be deemed unacceptable. As the site is a designated employment allocation, loss of the site for employment would need to be justified and mitigated. The Consortium considers the delivery of housing on this site which is in active employment use would be contrary to policy and the inclusion of this site in the supply is contrary to the Council’s SHLAA methodology which discounts occupied employment sites (§3.20 SHLAA 2018)
- 6.14 Furthermore, half of the site comprises a former landfill and is therefore considered unsuitable for residential development unless it can be made safe. The level of contamination on the site is not fully known and a robust assessment of the potential contamination and stability on the site has not been undertaken. It is therefore not clear whether any potential contamination could be sufficiently remediated and the site made safe for residential development. It is highly likely that due to made ground piling will be required across the site, at a considerable cost, undermining the viability of the site.
- 6.15 The Stockport SHLAA states that the site could potentially be developed over the long term in conjunction with the neighbouring site to the east (Land at Adswood Road), which is also identified as a former landfill. The Consortium considers that the deliverability of the site is questionable and its viability for residential development must be questioned due to its former use as a landfill site and the quantum of remediation likely to be required.
- 6.16 Furthermore, the site’s neighbouring land use to the south (recycling facility) is considered an incongruous use for any proposed residential development on the site. The Consortium considers that residential development is unsuitable and inappropriate on the site, due to the industrial nature of the recycling facility and its close proximity to the site and the site would not be attractive to the market.

Conclusion

- 6.17 The Consortium considers that the Council has not demonstrated that the site has reasonable prospects of being delivered for residential development, and the site should therefore be discounted from the Council’s claimed supply.
- 6.18 Furthermore, the conflict with the saved policies of the UDP and the neighbouring land use further compromise the developability of this site.

Land off Adswood Road, Cheadle Hulme (SHLAA Ref: SKH17134)

- 6.19 The SHLAA sets out that the site at Adswood Road, Cheadle Hulme could deliver 108 units with 30 being delivered in years 11-15 and the remaining 78 in years 16-19 of the plan period with an average density of 30dph. The SHLAA sets out that the site comprises scrubland and is located immediately to the south of a railway line and adjacent to a builder’s yard.
- 6.20 There is significant potential for contamination to be present on the site due to its former use as a landfill, which could undermine the viability of the site’s deliverability as a residential development. The surrounding land uses and the train line also affect the developable area of the site.
- 6.21 A planning application was approved on an adjacent site (to the south) in December 2013 for the development of 163 managed flats comprising a three/ four storey block of flats and one three

storey block of 24 sheltered flats for the elderly. This permission was a renewal of a previous permission for a similar development on the same site and was brought forward by a national housebuilder. This permission has now expired and it would appear that the development has not commenced.

- 6.22 It is not clear why neither of these previous permissions were implemented when under the control of a national housebuilder, but it may be due to issues associated with the site's previous use and potential remediation necessary to make the site safe for residential development. The permissions relate to a neighbouring parcel of land, however, the characteristics of the land (vacant scrubland) are similar to the SHLAA site, and similar issues may be present.

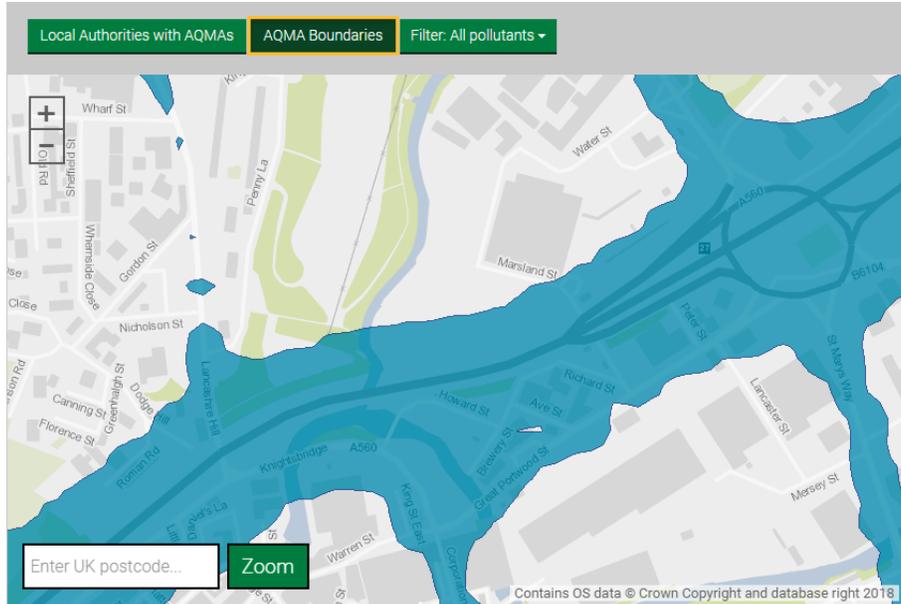
Conclusion

- 6.23 The Consortium has significant reservations about the developability of this site and the Council has not provided sufficient evidence to justify that the site has reasonable prospects of being delivered within the plan period. As such, the assumed delivery on this site should be discounted unless additional evidence is presented by the local authority to demonstrate its developability.

Land behind Meadow Mill, Stockport (SHLAA Ref: SKH17142)

- 6.24 The Stockport SHLAA sets out that the site known as Land behind Meadow Mill, Stockport has the potential to deliver 300 units within the plan period with 225 units being delivered in years 6-10 and the remainder in years 11-15. The Council assume a deliverable density of 58 dph on the site but the Consortium consider that this is unrealistic and undeliverable even setting aside the following issues with the site's developability.
- 6.25 The site is a former industrial site contained by: the motorway which is elevated about the ground level of the site immediately to the south; the River Tame to the west and north and the rear of a large Tesco Extra store and its associated car park to the east. It would appear that although the buildings have already been demolished on the site, the hardstanding at ground level associated with the former building remains in situ.
- 6.26 The majority of the site benefits from outline planning permission for the development of a B2/B8 employment use with associated parking which was granted in December 2016. Although implementation of this permission has not commenced, it remains extant and the site is being marketed on CBRE's website for employment purposes (<https://www.commerciallistings.cbre.co.uk/en-GB/listings/industrial/details/GB-Plus-447895/j27-water-street-sk1-2bt?view=isLetting>).
- 6.27 Although the site is in close proximity to Stockport Town Centre as the crow flies, its connectivity to the town centre is severely compromised by the motorway and non-vehicular access is only gained via the Marsland Street underpass under the motorway. Furthermore, there are no other residential developments adjacent to the site and land on both sides of the motorway in the wider area is generally used for employment, underutilised land, allotments and retail uses. A significant proportion of the site is also located within an Air Quality Management Area (See Figure 1) which would compromise the developability and suitability of the site.

Figure 1 Air Quality Management Area



Source: DEFRA, Air Quality Management Areas Map

6.28 The site was considered in the Stockport Employment Land Review 2018 (Site Ref: Site 7: Water Street). The ELR stated that the site is undeveloped but allocated for employment. The site benefits from excellent proximity to the M60 and minimal surrounding sensitive uses. However, the site is located in an area of risk from flooding and is not well served by public transport. The ELR did not recommend that the land be redeveloped for alternative purposes and as such, its inclusion in the SHLAA as a suitable residential site is contrary to the findings of Stockport's own evidence.

Conclusion

6.29 The Consortium considers that the inclusion of this site within the SHLAA is completely unrealistic and there are very little prospects of this site being developed for residential purposes. The site is highly constrained, is likely to have significant contamination issues and the surrounding land uses do not make this an attractive site to the market or a suitable site for residential development.

6.30 As such, the Consortium considers that the site should be discounted completely (300 units) from the overall supply.

Avery & Aqueduct Trading Estate, Kenwood Road (SHLAA Ref: SKH17143)

6.31 The SHLAA sets out that the site at Avery & Aqueduct Trading Estate could deliver 300 units over the course of the plan period with 54 coming forward in years 11-15 and the remaining 246 coming forward in years 16-19. The site currently comprises an industrial estate set in a triangular wedge between a railway line, a disused railway line and residential development.

6.32 The site visit conducted to inform this assessment of the SHLAA sites would indicate that the majority of the units on the site are in active use and the general condition of the premises on site are good. No relevant planning applications have been submitted for this site. The

redevelopment of this site would also result in the loss of a large active employment site and would be contrary to Stockport's own planning policy.

- 6.33 The SHLAA sets out that some land purchase and assembly may be required to bring this site forward. It is not clear how many ownerships the land is currently in and how amenable to disposing of the land and relocating existing business the owners are. Given the site's current use, even if land assembly issues were overcome, it is not clear what remediation work would be required and if the cost of this remediation would compromise the site's delivery particularly bearing in mind that the sales values achievable in the surrounding area are lower than would be generated elsewhere in Stockport. The Consortium has reservations about the developability of this site and does not consider that the Council has provided sufficient information to demonstrate that the site has reasonable prospects of delivering units over the plan period.
- 6.34 Setting aside the aforementioned concerns in relation to the developability of the site, it is unclear why the Council consider that 246 units can be delivered in 4 years (62 dwellings per year) when the Council's own methodology (Figure 3.4 SHLAA 2018) sets out that a site with a capacity of 150+ units would deliver 45 dwellings per annum. The Consortium considers that the Council is overstating the number of units which could be delivered on the site and have not followed their own methodology in determining the likely yield rate from the site. Notwithstanding, the Consortium consider that only a handful of national housebuilders could deliver 45 units per annum of sites.

Conclusion

- 6.35 The Consortium has significant concerns in relation to the developability of this site and its ability to deliver 300 units over the plan period. The assembly of the land and relocation of a significant number of businesses from the estate will be a lengthy process and there could also be some contamination issues associated with the site's former use. It is considered that the Council has not provided sufficient information to demonstrate that there are reasonable prospects of the site being developable.
- 6.36 Finally, the Council has not applied the delivery rates to this site as set out in their own SHLAA. If the correct delivery rates were applied and assuming that 54 units were deliverable in years 11-15, the capacity of the site would be 234, a reduction of 66 units from that currently included in the SHLAA. In any event, given the issues associated with the site and the lack of information provided by the Council to demonstrate reasonable prospects, the Consortium consider that the site should be discounted from supply.

Ford Garage, Wellington Road (SHLAA Ref: SKH17119)

- 6.37 The SHLAA sets out that the site known as Wellington Road (Ford Garage) has a site area of 0.94ha and could deliver 50 units over the course of the plan period at a density (gross) of 53dph which the Consortium consider is undeliverable and unrealistic in this location. The Council envisage that 50 units could be delivered between 11-15 years. The site is currently occupied by a Ford car dealership and associated garage, and is set between the A6 and a railway line. No relevant planning applications have been submitted on the site.
- 6.38 The site is currently occupied by a Ford car dealership and associated garage, and is set between the A6 and a railway line. The SHLAA states that the site is currently in active use as a Ford car dealership and servicing facility, and that this use would need to be relocated for residential development to take place. The SHLAA has not provided evidence to suggest that the occupier

intends to vacate the site, and there is therefore no evidence of the site becoming available for residential development over the next plan period.

- 6.39 The Consortium considers that the inclusion of this site in the supply is also contrary to the Council's SHLAA methodology which discounts occupied employment sites (§3.20 SHLAA 2018). The site would not qualify as an exception to this consideration within the methodology, as the site has not been vacant for any extended period, is not being marketed for alternative use, and is not included within the Council's ELR.
- 6.40 The Consortium also considers that should the site become available for development, the density assumption for the site of 53dph is excessive, and no justification has been provided to demonstrate this achievable. Development would need to be set back from the railway line to the west, and the A6 to the east, to ensure any noise impacts are mitigated, thus reducing the net developable area. Furthermore, a proportion of the site to the south and east is located within an AQMA, which could further restrict the developable area of the site. For these reasons, it is considered that the anticipated number of units on the site should be reduced in any case, although the Consortium is still of the opinion that the site is not developable.

Conclusion

- 6.41 The Consortium considers that as the site is currently in active employment use and there is no evidence of the current occupiers of the site vacating, there are no reasonable prospects of the site becoming available for residential development over the plan period. Therefore, the site's inclusion is contrary to the Council's SHLAA methodology.
- 6.42 Without the Council providing the evidence to demonstrate that there are reasonable prospects that the site will come forward, the Consortium considers that the claimed supply from this site should be discounted.

Goyt Mill, Stockport (SHLAA Ref: SKH17111)

- 6.43 The Stockport SHLAA sets out that the site known as Goyt Mill has a site area of 0.73ha, and could deliver up to 40 units at a density of 55dph. It is envisaged that the site could come forward for development within 6-10 years. The site comprises a mill building in a variety of active employment uses. The building is locally listed and situated within the Macclesfield Canal Conservation Area. No relevant applications have been submitted on the site.
- 6.44 The Stockport ELR states that the mill building is of dated quality. However, the building is fully occupied and it is therefore considered that the site and its current uses clearly meet a local employment need.
- 6.45 The site is allocated for employment use in the Stockport UDP under Policy E3.1 (Protection of Employment Areas), which sets out that development involving business and light industry (B1), general industry (B2) or warehousing (B8) will be permitted and proposals involving housing are likely to be deemed unacceptable. As the site is a designated employment allocation, loss of the site for employment would need to be justified and mitigated. The Consortium considers the delivery of housing on this site which is in active employment use would be contrary to policy, and the inclusion of this site in the supply is contrary to the Council's SHLAA methodology which discounts occupied employment sites (§3.20 SHLAA 2018).
- 6.46 The Consortium is also concerned about the site's residential compatibility. The site and the area surrounding it is industrial in nature, particularly with the industrial units surrounding the mill building, and the modern industrial units adjacent to Shepley Lane to the south of the site.

The SHLAA sets out that the mill has the potential to be converted on the upper 3 floors into a residential split use or a vertical split, which would retain employment uses and create a mix of uses throughout the building.

- 6.47 The Council has failed to provide robust evidence to suggest that a partial conversion of the building, retaining employment uses, is particularly desirable in the current market, or has reasonable prospects of being delivered. Potential residents are unlikely to want to live within an area of industrial nature if other uses within the area remain, and this may present issues in terms of market desirability. Residential development on the site only appears suitable and marketable should the whole mill building come forward as a comprehensive conversion, which would be contrary to local employment policy and the Council's SHLAA methodology.
- 6.48 Furthermore, the site is not considered to be particularly sustainable. It is located on the outskirts of Hawk Green, away from any strategic highways networks and distant from facilities or amenities. The site is also characterised by poor quality infrastructure both within and around the site, and suffers from a lack of public transport links.

Conclusion

- 6.49 The Consortium considers that the Council has not demonstrated that the site has reasonable prospects of being delivered for residential development over the next plan period, and additional evidence should be provided to justify residential development, the loss of employment uses, and conflict with local policy.
- 6.50 The Consortium has concerns regarding the site's sustainability, its residential compatibility as a partial conversion of the mill building, and uncertainty in relation to the market desirability of a site set within an industrial context. The Consortium therefore considers that the site (40 dwellings) should be removed from the claimed supply.

Oakwood Mills, Oakwood Road (SHLAA Ref: SKH17123)

- 6.51 The Stockport SHLAA sets out that the site known as Oakwood Mills has a site area of 3.98ha and could deliver 60 units at a net density of 15dph. It is envisaged that these units will be delivered in years 11-15. The site is currently in a number of uses, comprising Oakwood Mills industrial buildings, a bowling green and a substation. There are no relevant planning applications on the site.
- 6.52 The SHLAA states that the buildings associated with the Paper Mill could be partially redeveloped to create a mixed-use scheme providing a number of apartments and higher quality employment premises. The Consortium considers that there is insufficient evidence provided to suggest that this approach is either feasible or realistic in the context of the existing development, its industrial nature and active employment use. The introduction of residential development at the site, whilst retaining existing employment uses, may also present issues in terms of market desirability, as potential residents are unlikely to want to live within an active industrial area if other uses within the area remain.
- 6.53 The site appears to have been identified by the Council as part of a broad area for residential development rather than a definitive parcel of land. There is no definitive evidence, or demonstration of reasonable prospects, provided within the SHLAA regarding the anticipated form of development for the whole site. There is no evidence provided on how the Council has derived the claimed capacity for the site and it does not accord with their own SHLAA methodology.

- 6.54 The SHLAA states that some land purchase and assembly may be required, and no information has been provided regarding the willingness of the owners to redevelop the site, or sacrifice existing employment space. It is not clear how amenable to disposing of the land and relocating existing business the owners are.
- 6.55 Given the site's current use as a paper manufacturing facility and potential contamination issues, even if land assembly issues were overcome, it is not clear what remediation work would be required and if the cost of this remediation could compromise the site's delivery. Around a quarter of the site is currently within a conservation area, which incorporates the mill buildings towards the south. Any potential redevelopment or demolition of the mill buildings in this location would need to be sensitively carried out, and may have an impact on viability.
- 6.56 The area to the north of the site, including the bowling green, is identified as Local Open Space within the Stockport UDP. The Consortium considers that residential development in this area of the site is contrary to Policy UOS1.3 (Protection of Local Open Space), and development should be restricted in this location. Furthermore, there are a number of constraints on the site which cumulatively affect the developability prospects of the site.

Conclusion

- 6.57 The Consortium has concerns in relation to the developability of this site and its ability to deliver 60 units over the plan period. It is considered unlikely that a small element of the site could be delivered in a piecemeal fashion whilst retaining the existing employment uses on the site.
- 6.58 Any loss of employment would also need to be justified and mitigated, and it is not clear whether potential contamination issues on the site may negatively impact the viability of the site.

Adswood Road / Siddington Avenue (SHLAA Ref: SKH17010)

- 6.59 The Stockport SHLAA sets out that the site known as Adswood Road / Siddington Avenue has a site area of 1.95ha and could deliver 70 units at a density of 36dph. It is envisaged that these units will be delivered in years 11-15. The site is currently in active use as an industrial area, comprising several active employment uses, industrial units and Cheadle Skip Hire. There is no evidence that the site is being actively marketed for redevelopment.
- 6.60 The site is included in Policy HP1.1 (Housing Land Allocations) as an allocation for residential development within the Stockport UDP (2006). The allocation (H11 Adswood Road / Siddington Avenue) states the following:

“The majority of the site is currently in industrial use and was previously allocated as an Employment Area. However, it is no longer regarded as one of the best locations for employment in the borough. Access to the strategic highway network is indirect and poor, and the nature of the surrounding area has recently been changed. A new residential development is underway to the north (H8P Adswood Road/Range Road) and housing has been built on the opposite side of Adswood Road. Allowing the site to be redeveloped for housing will bring regeneration benefits and improve the appearance of the area. Located on a bus route with frequent services to the town centre and Cheadle Hulme District Centre, the site is highly accessible. It is 1 km walking distance to Davenport railway station and just over 1 km to Edgeley District Centre.”

- 6.61 Despite the site's allocation for residential development in the Stockport UDP, no applications for this use have been submitted and the site is in continued employment use. The site has now been allocated for almost 13 years within the UDP and has yet to be subject to an application for residential development. This would appear to point to a clear issue regarding the willingness of the landowner to redevelop the site and there has been no developer interest and no applications submitted. The SHLAA sets out that there may be some contamination issues on parts of the site which will need to be remediated, as well as a likely requirement for land assembly due to fragmented ownership. These may present significant constraints to development which could have prevented any developer interest in the site.
- 6.62 Further to this, there have been two separate applications seeking extended use of the site for their respective uses, which have both been granted permission:
- 1 **DC/071027:** Retention of existing uses and use of additional area for the recycling of non-hazardous waste, including the retrospective construction of a steel portal framed building and revised vehicular access at Unit 22, 23 and 24, Adswold Road Industrial Estate (Granted 1st March 2018).
 - 2 **DC/068948:** Continued use of the site as a transfer station for inert and non-inert waste (change of use for a temporary period permitted by DC/011898 and DC/028768) for a further time period of 5 years (Variation of Condition 1 of DC/028768) (Granted 6th July 2018).
- 6.63 The site is currently in active employment for a variety of uses. The Council has not provided evidence that the active employment occupiers on the site would be willing to relocate, or any evidence to suggest that the lack of interest in the site for residential development is likely to change over the next plan period. As such, the Council has not demonstrated that there are reasonable prospects of the site coming forward.

Conclusion

- 6.64 Unless the Council can provide further evidence to demonstrate that the site could come forward for residential development in the GMSF plan period, the Consortium considers that the site should be removed from the Council's claimed supply for the reasons set out above.

Nurses Home off St Anns Road North, Heald Green (SHLAA Ref: SKH17122)

- 6.65 The Stockport SHLAA sets out that the site known as Nurses Home off St Anns Road North has a site area of 2.56ha and could deliver up to 60 units at a density of 23dph. The Council envisages that the site could be delivered within 6-10 years. The site is currently a mixture of greenfield and brownfield land and comprises a former nurses home, associated land to the east, and an area of open space to the west of the former nurse's home.
- 6.66 The Consortium has concerns in relation to the developability of this site and its ability to deliver 60 units over the plan period. The Consortium's primary concern relates to a significant proportion (around 2/3) of the site's designation as Local Open Space (Policy UOS1.3 – Protection of Local Open Space) in the Stockport UDP. It is acknowledged in the SHLAA that the site was not considered within the Open Space Assessment as the site is not publicly accessible. In any event, the Consortium considers that residential development in this location would be contrary to local planning policy, and additional information is required to demonstrate that any loss of Local Open Space would not be detrimental to the local community and could be adequately mitigated.

- 6.67 There are a significant number of Tree Preservation Orders [TPOs] on the site, as well as Tree Preservation Area Orders [TPAOs] which cover larger areas than individual TPOs. These provide a significant constraint to development, and significantly restrict the developable area of the site. No evidence has been provided by the Council to provide an intention to remove any of the trees, or that any potential development will not have a harmful impact on the TPOs or TPAOs. 60% of the site is also located within a conservation area and any potential development in these locations would need to be sensitively carried out, and may impact on viability.
- 6.68 An area to the east of the site is also identified as Green Chain (Policy NE3.1 - Protection and Enhancement of Green Chains). The policy states that any development which would detract from the wildlife or recreation value of the Green Chain will not be permitted, and no information has been provided by the Council to demonstrate that any redevelopment of the site could be undertaken in a way that does not detract from the wildlife or recreation value of the Green Chain.
- 6.69 The Consortium considers that the former nurses home could potentially be re-developed or demolished to make way for residential development. However, accessibility to this area of the site is restricted. There is no obvious access into this area without traversing the area of Local Open Space or through the employment site to the north.

Conclusion

- 6.70 Unless the Council can provide further evidence to demonstrate that the site could come forward for residential development in the next plan period, the Consortium considers that the site should be removed from the Council's claimed supply due to the constraints set out above, and the majority of the site's designation as Local Open Space.

Site of 56-72 Wellington Road North (SHLAA Ref: SKH17040)

- 6.71 The Stockport SHLAA sets out that the site known as Site of 56-72 Wellington Road North has a site area of 0.25ha and could deliver up to 40 units at a density of 160dph. It is envisaged that the site could be delivered within 11-15 years. The site is currently in use as a hand car wash facility, with the remainder of the site comprising surface car parking. There are no relevant planning applications on the site.
- 6.72 The Consortium considers that the density of development proposed on the site (160dph) is completely unrealistic and undeliverable. The density and likely height and scale of the building to deliver 40 units on this site is particularly inappropriate in the context of the surrounding uses, namely the two-storey terraced housing adjacent to the south of the site, and the residential development to the north east of the site beyond Wyatt Street which is also of a significantly lower height. It is considered that this density is not appropriate in this location given the surrounding context, and would represent an incongruous overdevelopment of the site. No evidence is provided by the Stockport SHLAA which demonstrates that 160dph is suitable in this location or how it has been derived.
- 6.73 At the anticipated density of 160dph, the Consortium disagrees with the statement in the SHLAA which states that the redevelopment of this site offers an opportunity to improve amenity for nearby houses, and enhance the setting of the Grade II listed Wycliffe Congregational Church. It is difficult to envisage how a high-density scheme of the height required to deliver 40 units would enhance the setting of the Grade II listed building, or improve amenity for nearby houses. As such, the Consortium would advocate a lower density of

development if these objectives are to be realistically achieved which would result in less units being derived from the site.

Conclusion

- 6.74 The Consortium would accept that the site has the potential to deliver some housing over the course of the plan period. However, it is considered that the assumed density of 160dph is inappropriate and unsuitable for the area. The Council has not demonstrated reasonable prospects of this level as required by national policy.
- 6.75 If the site does come forward for development, the number of units it would realistically deliver would be less than is currently being advocated. As such, a proportion of the claimed supply from this site should be discounted and the Council's delivery assumptions are not robust.

7.0 Overall Conclusion

- 7.1 The review of Stockport's SHLAA methodology and all sites with a capacity of 40+ units has demonstrated that the Council's claimed supply is significantly above what is realistically possible to be considered as developable. Given the importance that the Council is placing on the findings of the SHLAA to determine the quantum of Green Belt land that is required to meet the Council's housing need, a more robust assessment is required.
- 7.2 The Consortium's particular concerns centre on the claimed delivery from the Town Centre Living Allowance. It is considered that the Council's aspiration to redevelop the Stockport Town Centre is commendable but that the majority of the units proposed to be delivered will predominantly be higher density one and two bed apartments. This will meet a proportion of Stockport's needs but only a relatively small component of it. Additional land will be required to deliver family homes and appropriate levels of affordable homes. Notwithstanding the concerns in relation to the oversupply of smaller units, the ability of the market to deliver and sell 3,500 smaller units (30% of Stockport's overall supply) is questionable. Finally, landownership and other constraints could delay the delivery of a significant proportion of these sites.
- 7.3 The Consortium is also concerned in relation to the Council's claimed supply over the plan period. Of the 33 sites assessed in detail, it is considered that 11 of the 33 with a capacity of 40+ units are questionable with 9 being considered completely undevelopable:
- Former Cheadle Brickword Site, Adswold Road, Cheadle Hulme
 - Land off Adswold Road, Cheadle Hulme
 - Land behind Meadow Mill, Stockport
 - Avery & Aqueduct Trading Estate, Kenwood Road
 - Ford Garage, Wellington Road, Stockport
 - Goyt Mill
 - Oakwood Mills, Oakwood Road
 - Adwood Road/Siddington Avenue, Adswold
 - Nurses Home off St Anns Road North, Heald Green
- 7.4 As such, it is reasonable to assume that there are other sites with a capacity of less than 40 units which are also undevelopable over the plan period.

- 7.5 The 9 sites outlined above which the Consortium considers are completely undevelopable have a combined capacity of 1,148 units. Furthermore, the Consortium considers that an additional 224 units should be removed from the windfall allowance. Setting aside the Consortium's concerns in relation to the other 11 sites assessed above, which are likely to be developable but not at the level envisaged by Stockport Council and the substantial concerns expressed above in relation to the subordinate Town Centre Living allowance, Stockport Council needs to find additional developable land in the authority area and the Consortium considers that this can only be done through the identification of appropriate additional Green Belt releases.
- 7.6 In conclusion, the Consortium is concerned that the conclusions of the SHLAA are flawed and should not be used as justification for the level of Green Belt release proposed in Stockport. The Consortium considers that additional Green Belt sites will need to be identified to meet Stockport's housing requirement as set out in the GMSF.

Appendix 2 Bury SHLAA Review

Bury SHLAA (2018) Review

1.0 Introduction

- 1.1 The Greater Manchester Spatial Framework [GMSF] is being produced by all 10 Greater Manchester Councils working together in partnership. The GMSF seeks to ensure that the right land is available in the right places to deliver the homes and jobs needed up to 2037, and will identify the new infrastructure such as transport, schools, health centres and utility networks required to achieve this.
- 1.2 The GMSF will set the overall housing figure for Bury, superseding the last housing requirement figure for Bury which was set out in the North West Regional Spatial Strategy [NWRSS], which was revoked in May 2013. Bury has not had an adopted housing requirement since the earlier Unitary Development Plan [UDP] was adopted in 1997. The GMSF will also provide large-scale housing allocations where considered necessary to help deliver this target.
- 1.3 Taylor Wimpey understands that each local authority across Greater Manchester is undertaking an exercise to update its own land availability assessment and the findings of each will be collated together at the Greater Manchester level to inform ongoing work on the GMSF.
- 1.4 Taylor Wimpey has reviewed the Bury SHLAA and has a number of concerns in relation to the robustness of the claimed supply within this evidence base document. The importance of having a robust and realistic SHLAA is paramount given that the findings of the SHLAA underpin the Council's claimed housing land supply and overall housing strategy. Conversely, the quantum of allocations needed in the district, including on Green Belt land will be based on the difference between the claimed supply and the housing requirement.
- 1.5 This Note assesses the Bury SHLAA and seeks to outline the key areas of concern, which will need to be appropriately addressed before the Submission version of the GMSF is submitted to the Planning Inspectorate for Examination.

2.0 Policy Context

National Planning Policy Framework

- 2.1 The Framework sets out that the planning system should be genuinely plan led with succinct and up-to-date plans providing a positive vision for the future of an area [§15]. In terms of housing, the Framework seeks to support the Government's objective of significantly boosting the supply of homes by ensuring that a sufficient amount and variety of land can come forward where it is needed [§59].
- 2.2 The Framework [§67] goes on to note that:
- "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*
- a. Specific, deliverable sites for years one to five of the plan period; and*

b. *Specific, developable sites or broad locations for growth, for years 6-10 and, where possibly, for years 11-15 of the plan"*

2.3 Annex 2 of the Framework seeks to define the terms 'deliverable' and 'developable'. For a site to be included in a SHLAA, it must be considered developable, which is defined as:

"To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged".

2.4 In terms of windfalls, the Framework [§70] sets out that where an allowance is to be made for windfall sites as part of anticipated supply, *'there should be compelling evidence that they will prove a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.'*

National Planning Policy Guidance

2.5 The National Planning Practice Guidance [ID: 3-001-20140306] sets out that the assessment of land availability is an important step in the preparation of Local Plans.

2.6 The Practice Guidance states that:

"An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the Strategic Housing Land Availability Assessment requirement as set out in the National Planning Policy Framework."

2.7 It notes that the assessment should include:

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

2.8 The Practice Guidance [ID: 3-002-20140306] stipulates:

"The assessment forms a key component of the evidence base to underpin policies in development plans for housing and economic development, including supporting the delivery of land to meet identified need to these uses."

3.0 Methodological Concerns

3.1 At the outset and as a general point, Taylor Wimpey would like to express their concern in relation to the inconsistency of approach adopted by all 10 Greater Manchester authorities in forming their evidence base and in particular their SHLAAs. The methodologies of all ten SHLAAs vary considerably and given their importance and the reliance placed upon them across Greater Manchester to justify the quantum of brownfield land available, this constitutes a flawed approach to determining an overall spatial strategy. It is disappointing as all 10 authorities have been working together for over 2 years to prepare this iteration of the GMSF and a consistent evidence base should have been achieved.

3.2 Taylor Wimpey has a number of concerns in relation to the assumed delivery rates/lead in times/land availability within the SHLAA and details of the concerns are set out in more detail

below. It would also appear that housebuilders and developers active in the Bury market have not been engaged with effectively, which constitutes a missed opportunity given their knowledge of the local market and the evidence and assistance they could have provided to the Council.

- 3.3 The methodology set out in the Bury SHLAA is limited and provides very little detail on the assumptions which underpin the output of the SHLAA. For example, the SHLAA does not provide detail on the net developable area calculations used on sites or evidence that the density assumptions are reasonable. Finally, no detail is provided on the lead in times for the completion of sites. As a result, Taylor Wimpey considers that the SHLAA is not sufficiently transparent and additional evidence is required to demonstrate that the assessment can be relied upon to support the spatial strategy.
- 3.4 Taylor Wimpey also has significant concerns regarding the Council’s identification of ‘*broad areas*’ as developable sites within the SHLAA. Para. 3.44 sets out the following:
- “The Council has identified some broad areas where future housing will be encouraged as part of mixed use redevelopments. It is the intention to draw up masterplans in these areas to help progress their redevelopment. These include broad areas within the existing urban area (e.g. on the edges of town centres). They mainly relate to areas that have opportunities to re-engineer land uses within the area, presenting some opportunities for residential use. It should be noted that at this stage (i.e. without the benefit of detailed masterplans) a conservative number of residential units has generally been put against 19 these area searches. Therefore, as work progresses on this front the SHLAA will be updated to take account of any increased potential from these areas (as well as any other sites coming forward).”*
- 3.5 Despite the Council claiming the use of ‘*conservative*’ estimates on the number of units which can be delivered, Taylor Wimpey considers that this approach, using ‘*broad areas*’ instead of individually identified sites, is flawed and insufficient evidence is presented to justify the developability of the sites.
- 3.6 The Council has stated its intention to ‘*draw up masterplans for these broad areas to help progress their development*’. However, if the Council is to include these areas as developable sites within the SHLAA, masterplans should be provided as a minimum in order to understand the robustness of the delivery assumptions within these areas. It would appear that very little work has been carried out on these ‘*broad areas*’ to properly understand the quantum of units which can be viably and realistically delivered in these locations. No indication of land ownership is provided or owner’s willingness to redevelop these sites. It is therefore considered that identifying ‘*broad areas*’ on a map is not sufficient to adequately demonstrate that a site is developable. This point is further highlighted in Section 4.0 (Site Analysis) for two sites which are identified as an ‘Area Search’.
- 3.7 Taylor Wimpey has undertaken a review of a number of the site proformas and considers that insufficient detail is provided on the density and delivery assumptions on sites, particularly sites which do not have planning permission. Furthermore, as a general point, Taylor Wimpey concludes that a disproportionate number of sites identified in the SHLAA currently comprise active employment sites situated in various locations across the Borough. Their redevelopment would conflict with local policy and it is considered to directly conflict Objective 3 (Ensure a thriving and productive economy in all parts of Greater Manchester) of the Draft GMSF, which states that the GMCA will:
- 1 Ensure there is adequate development land to meet employment needs; and,
 - 2 Ensure there is a diverse range of employment sites and premises.

- 3.8 Overall, Taylor Wimpey considers that the SHLAA is flawed, needs considerable revision and cannot be relied upon to justify the level of delivery expected in Bury on brownfield sites over the plan period.

4.0 Site Analysis

- 4.1 Taylor Wimpey has conducted a site by site analysis of all sites with an indicative capacity of at least 100 units to assess the robustness of the Council's claimed developable supply. In total, there are 18 sites with a capacity to deliver 100 units or more identified in the Bury SHLAA, though only 14 have been assessed as 4 of the 18 sites represent emerging draft allocations in the GMSF (Seedfield (Site Ref. HL/2518/00); Elton Reservoir (Site Ref. HL/2847/00); Walshaw (Site Ref. HL/2848/00); Northern Gateway (Site Ref. HL/2900/00).
- 4.2 Given the large number of sites contained within the Council's SHLAA, it was considered that selecting sites over 100 units was a reasonable threshold to set and would provide a reasonable indicator of the robustness of the sites contained within the SHLAA overall. Discounting 3 proposed GMSF allocations¹, the 14 assessed sites have a claimed capacity of 2,922 units, which equates to around 40% of the overall supply.
- 4.3 The analysis of these sites involved a desktop appraisal of each site reviewing its designation, previous planning history; surrounding land uses and its suitability and sustainability as a residential site, as well as using Taylor Wimpey's knowledge of delivering units on PDL sites in Greater Manchester. The desktop assessment also considered environmental, physical, infrastructure and any other obvious constraints which would affect the developability of the site. Following the desktop assessment, a site visit was undertaken to validate any obvious concerns and identify any other issues which may not have appeared during the desktop exercise.
- 4.4 As a result of the analysis undertaken, Taylor Wimpey would question the developability and claimed supply within the SHLAA of 7 of the 14 sites with a capacity of 100 units+ included. It is considered that the claimed supply is being significantly overstated and the Council has not provided sufficient evidence to demonstrate that there is a '*reasonable prospect*' that the sites will come forward as envisaged as is required by national policy.
- 4.5 There appears to be a general over-estimation regarding the expected density of the majority of sites over 100 units, and there are also several sites over 100 units within the SHLAA that are included within the Bury But Better Masterplan (2009), yet no significant progress has been made on these sites since. Development is still yet to come forward on these sites ten years after they were identified for development within the masterplan, which raises considerable uncertainty over their developability.
- 4.6 By extension, it can be reasonably assumed that if there are significant concerns in relation to half of Bury's larger sites, a significant number of smaller sites are also likely to not have reasonable prospects of coming forward. Reasoned justification of our concerns with each site is set out in more detail below.

Land off Knowsley Street, Bury (SHLAA Ref: HL/2230/00)

- 4.7 The Bury SHLAA sets out that the site known as Land off Knowsley Street has a site area of 0.373ha and can deliver 200 units at a gross density of 536dph. The site is included within

¹ Seedfield (Site Ref. HL/2518/00) is included in the potential supply set out in para. 8.5 of the Bury SHLAA Summary.

Category 4 - Unconstrained Potential, within the SHLAA. It is envisaged that these units will be delivered in years 6-10. The site currently comprises a secure public car park, which is currently in active use and is constrained to the east and south by active railway and tram lines. The developable area of the site is likely to be restricted due to the requirement to put appropriate mitigation in place.

- 4.8 The planning history related to the site comprises several applications for mixed use developments. Outline planning permission was granted on 18th Sep 2013 for a new leisure centre comprising 7,575sqm (max) gross floorspace, with landscaping and other associated elements. However, this permission was not implemented.
- 4.9 The site was identified within the saved policy of the Bury UDP as land suitable for Business (B1) Office and Hotel/Conference Facility Uses (Policy EC1/3). Specifically, the site is identified within Policy EC1/3/1 (Land off Knowsley Street, Bury) and states the following:
- 1 The site occupies a prominent position in the town centre and as such any development will be limited to business (B1), offices or hotel/conference facilities; and,
 - 2 The existing car park should either be retained, or an equivalent number of spaces should be provided elsewhere.
- 4.10 It is not clear whether the Council intends to retain the car park as part of any potential development consistent with that suggested in the SHLAA. Nonetheless, Taylor Wimpey considers that residential development at the site would be contrary to policy E/C1/3/1 as development will not be used for business (B1), offices or hotel/conference use.
- 4.11 The site was also identified in the Bury But Better Masterplan (2009) as part of a wider development including Council Offices, an NHS Medical Centre, hotel, apartments and multi-storey car park.
- 4.12 Taylor Wimpey considers that the density of development proposed on the site (536dph) is wholly unrealistic. It is also not clear whether the existing car parking spaces are to be retained, which would further increase the floorspace required and a higher development would also be required. The density and likely height and scale of the building to deliver 200 units on this site is particularly inappropriate in the context of the surrounding uses, such as the 3-storey residential buildings located to the south of the site and would represent an incongruous development in this location.
- 4.13 To put this density of 536dph into context, the Manchester SHLAA (2010)² set out that '*average densities for completed units have varied between 82 and 96 units per hectare over the last four years*' [§7.16]. The density being advocated on this site is 5 to 6 times the density that was being delivered in Manchester City in 2006-2010 which has seen a significant level of its housing supply delivered in the form of city centre apartments. No evidence is provided by the Bury SHLAA which demonstrates that 536dph is deliverable or viable in this location.

Conclusion

- 4.14 Taylor Wimpey would accept that the site has the potential to deliver some housing over the course of the plan period so long as the Council provides sufficient evidence to justify the conflict with Policy EC1/3/1, and demonstrate that residential development is suitable on the site. However, Taylor Wimpey retains substantial concern relating to the deliverability of the

² The latest SHLAA available for Manchester at the time of writing dates back to 2010.

scale of development claimed by the SHLAA and the density assumptions on the site supporting this claimed supply.

- 4.15 It is considered that the assumed density of 536dph is entirely inappropriate and unachievable for the area. If the site does come forward for development, the number of units it would realistically deliver would be significantly less than is currently being advocated. As such, a significant proportion of the claimed supply from this site should be discounted and the Council's delivery assumptions are not robust.

York Street Industrial Area (Area Search), Bury (SHLAA Ref: HL/2374/00)

- 4.16 The Bury SHLAA sets out that the site at York Street Industrial Area comprises 8.35ha and could deliver 200 units at a gross density of 29dph. It is envisaged that these units could be delivered within 6-10 years. The site is included within Category 4 - Unconstrained Potential within the SHLAA. The site currently comprises numerous land parcels separated by minor roads, with a mix of vacant / derelict industrial buildings, cleared vacant land, and a cluster of smaller industrial units in active use to the east and south of the site.
- 4.17 The site visit conducted to inform this assessment of the SHLAA sites indicates that several units on the site are in active use, though the general condition of the premises on site are poor (Figure 1). No relevant planning applications have been submitted for this site. The redevelopment of this site would result in the loss of a partly active employment area.

Figure 1 Derelict Industrial Building, York Street Industrial Area



Source: Site Visit (February 2019)

- 4.18 The site is identified as an 'Area Search', which Taylor Wimpey has previously expressed significant concern over in Section 3.0. The site has been identified as a 'broad area' for residential development, though limited evidence has been provided by the Council to demonstrate with any degree of certainty that units can be delivered on specific parcels of land within the 'Area Search', and that the landowners are interested in the development of their land. Taylor Wimpey considers that some units could be delivered on the site, though the extent of potential delivery on the site it is not presently clear.
- 4.19 The SHLAA sets out that some land purchase and assembly may be required to bring this site forward. It is not clear how many ownerships the land is currently in and how amenable to

disposing of the land and relocating existing business the owners are. Given the site's current use, even if land assembly issues were overcome, it is not clear what remediation work would be required and if the cost of this remediation would compromise the site's delivery.

- 4.20 Taylor Wimpey is concerned about the site's residential compatibility. The site is set within an industrial context and is located immediately to the east of retail uses in the Town Centre. Residential development on the site may only appear viable and marketable should the whole 'Area Search' come forward as a comprehensive development. The Council has failed to provide robust evidence to suggest that this extent of development within the 'Area Search' has reasonable prospects of being delivered.
- 4.21 Furthermore, residential development in a piecemeal manner may present issues in terms of market desirability, as potential residents are unlikely to want to live within an active industrial area if other uses within the area remain. It also presents issues from an environmental health perspective, regarding the day-to-day function of the existing businesses and the development of residential development in close proximity may compromise their operational activities in particular, from a noise perspective.
- 4.22 Taylor Wimpey has reservations about the developability of this site and does not consider that the Council has provided sufficient information to demonstrate that the site has reasonable prospects of delivering units over the plan period.

Conclusion

- 4.23 Taylor Wimpey has significant concerns in relation to the developability of this site and its ability to deliver 200 units over the plan period. It is not clear how this claimed delivery has been derived and further evidence is required. The assembly of the land and relocation of a number of businesses from the estate could be a lengthy process and there could also be some contamination issues associated with the site's former use which will require further investigation.
- 4.24 The lack of evidence provided to support the delivery of 200 units is a concern, and Taylor Wimpey are of the opinion that the Council has not demonstrated reasonable prospects of the site being developed as required by national policy. As such, the site should be excluded from the Council's claimed supply until further evidence is available to demonstrate the site will come forward.

Longfield Suite, Prestwich (SHLAA Ref: HL 2492/00)

- 4.25 The Bury SHLAA sets out that the site known as Longfield Suite has a site area of 1.887ha, and could deliver up to 280 units. The SHLAA states that the site can deliver 280 units at a density of 67dph. However, this calculation is incorrect. The density for 280 units on a site size of 1.887ha is 148dph. The SHLAA envisages that these units could be delivered within 6-10 years. The site is included within Category 4 - Unconstrained Potential, within the SHLAA. The site currently comprises mixed uses, including retail, a pharmacy, medical practice, walk in centre, library and the Longfield Suite. A large area of the site is in use as a surface car park.
- 4.26 A search of the planning history of the site highlights the site's previous potential for a mixed-use re-development. The site had two separate planning permissions granted in 2009 and 2012 respectively for a mixed-use development, though both permissions have expired. Planning application ref. 54978 secured permission for food retail, non-food retail, restaurant, library, offices, 36 residential units, 70-bed hotel and a new Longfield Suite entrance. It is not clear why

this permission has not been implemented, though this could highlight potential issues with the developability of the site.

4.27 The majority of the site is in active use, though it is not clear whether the Council requires the whole site to come forward for development to contribute towards delivering the 280 units stated within the SHLAA. It is also not clear whether a number of these uses could be relocated to enable the stated quantum of development to come forward. Furthermore, the SHLAA does not state whether the Council intends for the site to come forward as part of a mixed-use redevelopment.

4.28 The Council has not provided robust information to demonstrate that their assumptions are reasonable, even factoring in the potential redevelopment of the Longfield Centre and has not demonstrated reasonable prospects as required by national policy. If the Council applied their assumptions correctly, the maximum this site could deliver would be 126 units at a density of 67dph. Taylor Wimpey would advocate that the Council provide additional evidence on the developability of the site and the claimed supply at least revised down from 280 units to 126 units.

Conclusion

4.29 Taylor Wimpey considers that the site has potential to deliver some units over the course of the plan period, but it is not clear how the Council has derived a capacity of 280 units, or whether the Council intends for the site to come forward as part of a mixed-use redevelopment.

Premier Mill, Bury (SHLAA Ref: HL 2200/00)

4.30 The Bury SHLAA sets out that the site known as Premier Mill has a site area of 2.637ha and can deliver 106 units at a gross density of 40dph. It is envisaged that this site will deliver 106 units after 15+ years. The site is included within Category 5 - Constrained Potential, within the SHLAA. Around 1/3 of the site is currently in use as an employment site (occupied by Lydall Industrial Filtration), with a woodland area comprising mature trees covering approximately 2/3 of the site (Figure 2). No relevant planning history is associated with the site.

Figure 2 Aerial View of Premier Mill, Bury



Source: Google Earth (2019)

- 4.31 Taylor Wimpey has concerns about the prospects of this site to come forward for residential development, particularly in relation to the extensive area of mature woodland covering 2/3 of the site, which is considered a significant constraint to development (Figure 3). Evidence has not been provided by the Council to justify the loss of the area of woodland for residential development. There is also potential for contamination on the employment element of the site due to the current land use.

Figure 3 Entrance to Premier Mill Site with Mature Woodland Area in Background



Source: (Site Visit, February 2019)

4.32 The area to the west of the site which comprises the woodland, is also identified within the Bury UDP as a site identified for business (B1), general industrial (B2) and warehousing uses (B8). Specifically, the site is identified within Policy EC1/3/3 (Rear of Edward Andrews, Leigh Lane, Bury) as a “*Vacant site suitable for expansion of adjacent employer or with provision of suitable access a freestanding development.*” As the site is a designated employment allocation, loss of the site for employment would need to be justified and mitigated and is against current policy. Furthermore, the has been allocated for 20+ years for employment and has not come forward. As such, it is reasonable to assume there is an underlying issue affecting its deliverability.

4.33 Regardless of whether the site is suitable to come forward as a residential development over the next plan period, Taylor Wimpey is also concerned about the density assumption of 40dph (gross) applied on the site. The site is situated within a location surrounded by low density residential development, predominantly comprising 2-storey detached and semi-detached housing. A density of 40 dph is not considered appropriate in this location given the surrounding residential context and the likely necessity to provide extensive landscaping as compensation for the loss of the woodland area and any ecological value this may harbour. Taylor Wimpey consider that a lower density, closer to 30dph, would be more appropriate on the site.

Conclusion

4.34 Taylor Wimpey considers that the Council has not demonstrated that the site has reasonable prospects of being delivered for residential development, and additional evidence should be provided to justify the loss of an extensive area of woodland including the necessity for compensatory ecological mitigation, the loss of employment land identified within the Bury UDP and its conflict with policy EC1/3/3, and the loss of an active employment site.

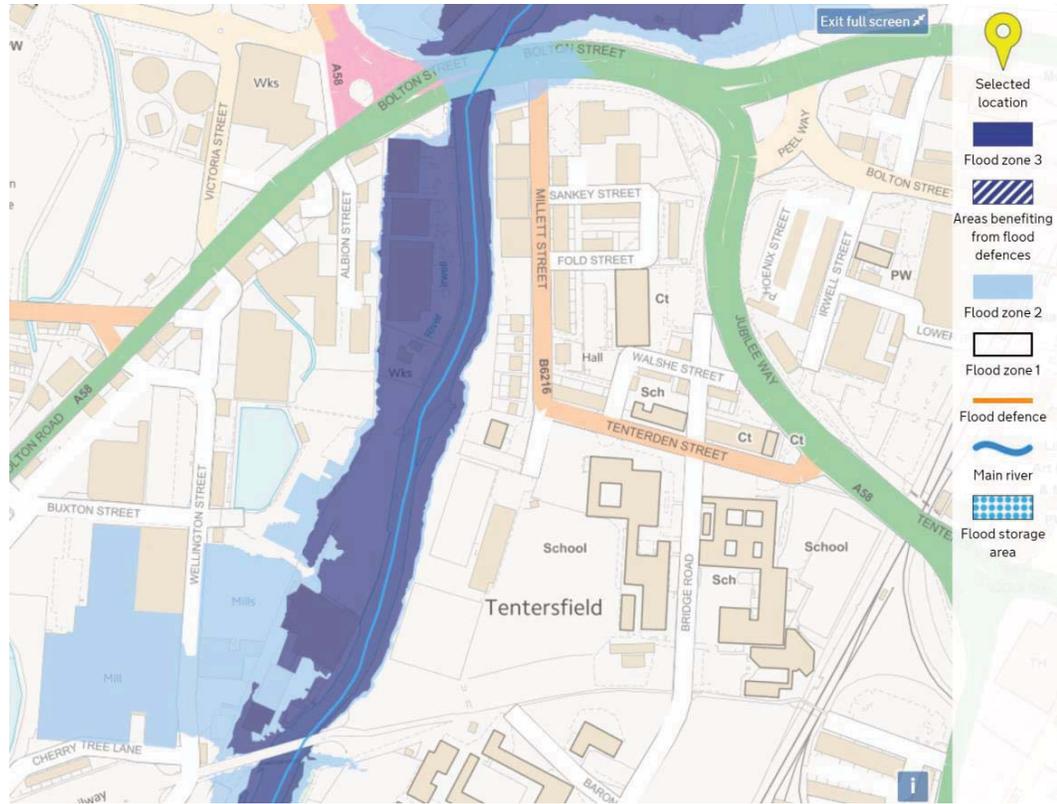
4.35 Taylor Wimpey also considers that the Council has overestimated the development capabilities of the site given the surrounding context. At a minimum, the density assumption should be

reduced, to take account of the surrounding character, and the developable area also needs to be reduced to take account of landscaping, ecological mitigation and necessary on-site infrastructure.

Western Waterside (Area Search), Bury (SHLAA Ref: HL/2375/00)

- 4.36 The Bury SHLAA sets out that the site at Western Waterside (Area Search) has a site area of 8.284ha and could deliver 270 units. The SHLAA states that the site can deliver 270 units at a density of 54dph. However, this calculation is incorrect, and for 270 units on a site size of 8.284ha the correct density would be 33dph. The SHLAA envisages that this site will deliver 270 units after 15+ years. The site is included within Category 5 - Constrained Potential, within the SHLAA. The site is currently in use as an industrial area and comprises a number of active industrial uses, including a CEMEX Concrete Plant. No relevant planning applications have been submitted for this site.
- 4.37 Taylor Wimpey has a number of concerns regarding the developability of the site for residential development. Firstly, the site is identified as an 'Area Search', which Taylor Wimpey have previously expressed significant concern over in Section 3.0. The site has been identified as a 'broad area' for residential development, though limited evidence has been provided by the Council to demonstrate with any degree of certainty that units can be delivered on specific parcels of land within the 'Area Search'. No information has been provided regarding site ownerships or the willingness of the owners to redevelop the site.
- 4.38 The site was also identified within the Bury but Better Masterplan (2009) as part of a significant redevelopment of the Western Waterside area which comprised:
- 1 Reopening of the canal and a new marina;
 - 2 Development of a new footbridge;
 - 3 Redevelopment of the industrial estate on the northern part of the site for mixed-use development; and,
 - 4 Residential development on the vacant industrial land in the southern part of the site.
- 4.39 The masterplan vision included the reopening of the canal and basin in the locality as a key part of the re-development, though it is stated within Section 13.1 (pg. 73) of the Bury But Better Masterplan that funding opportunities to restore and reopen the canal are no longer available, and increasingly difficult to secure on the scale required. The Masterplan also incorporates residential development within the vision. However, no significant progress has been on made on the site since it was identified within the Bury But Better Masterplan (2009), which is now 10 years old.
- 4.40 Of particular concern is the site's location within an area at risk to flooding (Figure 4). An extensive area of the site is located within Flood Zone 3, with a large area of the site located in Flood Zone 2. National policy seeks to direct development away from areas at risk of flooding, particularly vulnerable developments such as residential. As such, residential development at this site is not appropriate or acceptable unless extensive mitigation could be out in place to remove the site from the flood zone. The cost of such mitigation could undermine the viability if the development.

Figure 4 Flood Risk at Western Waterside Site



Source: Environment Agency Flood Map (2019)

4.41

Aside from flood risk, Taylor Wimpey has a number of other concerns regarding the site:

- 1 The SHLAA sets out that the site is in multiple ownerships and some land purchase and assembly may be required to bring the site forward. It is not clear how many ownerships the land is currently in and how amenable to disposing of the land and relocating existing business the owners are, or if funding is available to assemble the land;
- 2 Given the sites current use and potential contamination issues, even if land assembly issues were overcome, it is not clear what remediation work would be required and if the cost of this remediation, and the aforementioned flood risk mitigation, would compromise the site's delivery;
- 3 The site is identified within the Bury UDP as an Employment Generating Area (Saved Policy EC2/1/6), which is identified for Business (B1), General Industrial (B2), Warehousing (B8) and Leisure and Tourism Uses. The UDP states *"In the defined Employment Generating Areas, as identified on the Proposals Map, the Council will only allow development for the uses specified. Other uses will only be permitted where they constitute limited development or do not substantially detract from an area's value as an Employment Generating Area"*. Taylor Wimpey considers that residential development on the site would therefore be contrary to local planning policy and a change in policy would be required;

- 4 The site is located within a wider industrial area, and the site's compatibility and marketability for residential development given the surrounding uses is questionable; and,
- 5 An area to the north of the site is located within an Air Quality Management Area, which would restrict the developable area of the site.

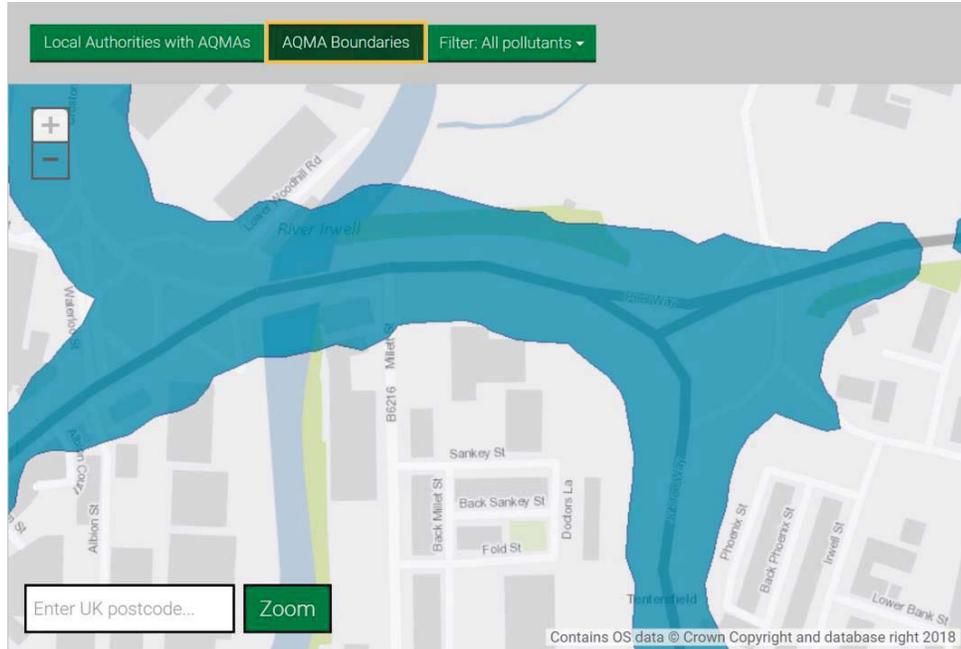
Conclusion

- 4.42 Taylor Wimpey considers that the inclusion of this site within the SHLAA is unrealistic and there are very little prospects of this site being developed for residential purposes over the next plan period. The Council has not demonstrated that there are reasonable prospects of the site coming forward.
- 4.43 The site is highly constrained, extensive areas are located in Flood Zone 2 and 3 and within an AQMA, could have significant contamination issues, is contrary to employment policy and may require significant land purchase and assembly.
- 4.44 As such, the site should be discounted completely from the overall supply.

Land North of Sankey Street, Bury (SHLAA Ref: HL/2376/00)

- 4.45 The Bury SHLAA sets out that the Land North of Sankey Street, Bury has a site area of 0.852 and could deliver 100 units at a density of 117dph. It is envisaged that these would be delivered after 15+years. The site is included within Category 5 - Constrained Potential, within the SHLAA.
- 4.46 The site is currently in active use as a car dealership and solicitor's offices, with the remainder of the site in use as a car park. The site is identified in the SHLAA as 'Constrained Potential' as it is still in use. The site is constrained to the north and east by the A58.
- 4.47 There is also potential for contamination on the site, and it is not clear what level of remediation may be required in order to make the site suitable for residential development. An area of the site is located within an Air Quality Management Area (Figure 5) which would compromise the developability and suitability of that element of the site.

Figure 5 Land North of Sankey Street, Air Quality Management Area



Source: DEFRA, Air Quality Management Areas Map (2019)

- 4.48 Taylor Wimpey also questions the density of development proposed on the site (117dph). The density is considered inappropriate in the context of surrounding uses, particularly the 2-story terraced housing located to the south of the site. The Council has not justified this density assumption and Taylor Wimpey considers that it is unrealistic.

Conclusion

- 4.49 Taylor Wimpey considers that the Council has not demonstrated that the site has reasonable prospects of being delivered for residential development over the next plan period, and additional evidence should be provided to justify residential development as the site is located within an AQMA, is still in active use for employment, and the level of remediation required on the site is not clear.
- 4.50 Taylor Wimpey also considers that the Council have overestimated the development capacity of the site given the surrounding context. At a minimum, the density assumption should be reduced and a lower number of units anticipated for delivery on the site, but Taylor Wimpey would advocate removing the site completely from the supply.

Crow Oak Works, Whitefield (SHLAA Ref: HL/2579/00)

- 4.51 The Bury SHLAA sets out that the site known as Crow Oak Works, Whitefield has a site area of 9.581ha with the potential to deliver 288 units at a density of 30dph. The Council envisages that the site can come forward for residential development after 15+ years. The site is included within Category 5 - Constrained Potential, within the SHLAA.
- 4.52 The site is currently in active use for employment purposes and is occupied by Polyflor Ltd, a flooring manufacturer. The SHLAA states that the site is in single ownership, but sets out that the current owners have no plans to vacate the site at present. Conflictingly, the SHLAA also

states that the site (partially or fully) may become available for residential development. However, Taylor Wimpey considers that this is a highly speculative approach, and there is no certainty that all or any of the site could realistically become available for residential development.

4.53 The site is identified within the Bury UDP as an Employment Generating Area (Saved Policy EC2/1/15 – Halsteads, Whitefield), which is identified for Business (B1), General Industrial (B2), Warehousing (B8) and Leisure and Tourism Uses. The UDP states *“In the defined Employment Generating Areas, as identified on the Proposals Map, the Council will only allow development for the uses specified. Other uses will only be permitted where they constitute limited development or do not substantially detract from an area’s value as an Employment Generating Area”*. Taylor Wimpey consider that residential development on the site would therefore be contrary to policy.

4.54 The SHLAA states that there is also potential for contamination on the site, and it is not clear what level of remediation would be required, and if the cost of this remediation would compromise the site’s delivery.

Conclusion

4.55 Taylor Wimpey considers that the Council has not provided sufficient information to demonstrate that there are reasonable prospects of the site being developable. There are uncertain prospects of the current occupiers vacating the site and enabling residential development to come forward over the next plan period.

4.56 The development of the site for residential purposes is also contrary to local policy and the level of remediation required on the site is unclear. As such, the site should be discounted from the overall supply.

5.0 Overall Conclusion

5.1 The review of Bury’s SHLAA methodology and all sites with a capacity of 100+ units has demonstrated that there are a number of issues with the Council’s claimed supply. Given the importance that the Council is placing on the findings of the SHLAA to determine the quantum of Green Belt land that is required to be released for housing development to meet the Council’s needs, a more robust assessment is required.

5.2 Taylor Wimpey has concerns regarding the methodology set out in the SHLAA, which is considered limited and provides very little detail on the assumptions which underpin the output of the SHLAA. The SHLAA does not provide detail on the net developable area calculations used on sites, the density assumptions and justification that the density assumptions are reasonable. Taylor Wimpey also has significant concerns regarding the Council’s identification of *‘broad areas’* as developable sites within the SHLAA, as these provide little certainty of the sites’ development capabilities. From reviewing a proportion of the sites, no clear and transparent approach has been adopted by the Council, which is considered a flawed approach.

5.3 There also appears to be a disproportionate reliance on redeveloping currently active employment sites for residential development, which is contrary to local planning policy. Regardless of whether these sites are realistic and viable for development, the extensive loss of employment land across Bury is considered to directly conflict with Objective 3 (Ensure a thriving and productive economy in all parts of Greater Manchester) of the Draft GMSF, which

seeks to ensure an adequate range, mix and quantum of industrial land across Greater Manchester.

- 5.4 Taylor Wimpey questions the reliability of the Council's claimed housing supply over the plan period. Of the 14 sites assessed in detail, it is considered that 6 of the 14 sites with a capacity of 100+ units are questionable with 4 being considered to be completely undevelopable. As such, it is reasonable to assume that there are other sites with a capacity of less than 100 units which are also undevelopable over the plan period.
- 5.5 Taylor Wimpey has serious misgiving about the current SHLAA and the Council needs to do everything it can to boost the supply of housing and not seek to overstate existing supply on brownfield sites in an effort to reduce the quantum of non-developed, including Green Belt land required for housing. Bury Council is advocating no flexibility in supply to act as a fall-back in the event of sites not coming forward. At present, there is no 'Plan B' being pursued by the Council to counteract any site not being deliverable or deliverable within the Plan period. Taylor Wimpey acknowledges that preparing SHLAAs is not an exact science but it is imperative that the Council takes a conservative approach to delivery and this has not happened in this case.
- 5.6 Taylor Wimpey is concerned that the conclusions of the SHLAA are flawed and should not be used as justification for the level of Green Belt release proposed in Bury. Taylor Wimpey considers that additional Green Belt sites will need to be identified to meet Bury's housing requirement as set out in the GMSF.

Appendix 3 Kingsway South Representation

Planning Team Consultation
GMCA
Churchgate House
56 Oxford Road
Manchester
M1 6EU

Submitted by email to: planningandhousing@greatermanchester-ca.gov.uk

Date: 18 March 2019
Our ref: 60409/01/JG/BOC/17120213v1
Your ref:

Dear Sir / Madam

Draft Greater Manchester Spatial Framework: Policy GM Allocation 3 – Kingsway South, Rochdale

We write on behalf of our client, Taylor Wimpey UK Limited [Taylor Wimpey], in response to the consultation on the draft Greater Manchester Spatial Framework [GMSF]. These representations seek to promote the site at Broad Lane, Rochdale for residential development and provides a detailed response to Q. 78 of the GMSF.

Background

These representations are made in the context of Taylor Wimpey's interests in Rochdale, namely land at Broad Lane, Rochdale. Taylor Wimpey's land interest comprises part of the emerging draft allocation at Kingsway South (Policy GM Allocation 3) which is identified to deliver around 310,000 sq.m of high quality, adaptable employment floorspace and around 700 new homes. Taylor Wimpey controls the land to the east of Broad Lane and to the south of the M62 motorway. A Landscape Led Masterplan has been prepared to set and has been submitted with these representations.

Taylor Wimpey has a proven track record of delivering high quality residential developments in Rochdale including the Pennine Gate site which is located very close to the Broad Lane site being promoted by these representations.

As set out in these representations, Taylor Wimpey supports the removal of the overall site from the Green Belt and its allocation for a mixed-use development in accordance with a comprehensive masterplan on the basis that:

- 1 It would assist in the delivery of sustainable development
- 2 Exceptional Circumstances exist to justify the release of land from the Green Belt and it does not fulfil Green Belt purposes; and
- 3 There are no insurmountable constraints to its development and it is wholly deliverable within the next five years.

Taylor Wimpey has made separate representations which set out their position in relation to a number of other policies within the GMSF and the associated evidence base.

Structure of the representations

These representations will address:

- 1 Question 78: Do you agree with the proposed policy GM Allocation 78: Kingsway South?
 - a Sustainable Development
 - b Deliverability
 - c Green Belt
- 2 Allocation Policy GM Allocation 36 – Detailed Consideration
- 3 Evidence Base
- 4 Conclusions

Question 78: Do you agree with the proposed policy GM Allocation 3: Kingsway South?

Taylor Wimpey **strongly agrees** with the draft allocation of the site at Kingsway South for employment and residential development. Taylor Wimpey has undertaken a detailed masterplanning exercise of the site and considers that their proposed masterplan (Appendix 1) for the strategic allocations (Appendix 2) delivers on the policy aspirations as set out in the GMSF and maximised the potential of the strategic allocation. The accompanying masterplan and demonstrates in detail that:

- 1 The proposed development constitutes sustainable development
- 2 The site is deliverable in the first 5 years post adoption of the GMSF; and
- 3 The site no longer fulfils the purposes of including land within the Green Belt.

Point 1-3 will be dealt with in turn below

Sustainable development

The accompanying detailed masterplan primarily focuses on Taylor Wimpey's element of the site and demonstrates that their site is:

- 1 Ideally located to create an attractive mixed-use development with a mix of high quality housing strategically located to compliment the high-quality employment floorspace located to the centre and north of the site.
- 2 Ideally situated in relation to services in Rochdale and will create an attractive setting along Broad Lane and screening the employment development to the rear of the site.

The delivery of residential development on Taylor Wimpey's element of the Kingsway South site would have positive economic, social and environmental benefits and will therefore constitute sustainable development in accordance with the Framework [§8].

Economic

The draft GMSF seeks to promote strategic growth across the whole of Greater Manchester and secure high levels of investment in the sub-region. Delivering residential development at Taylor Wimpey's site in close proximity to the proposed employment provision will aid the objective of delivering economic growth in the north of the conurbation. The delivery of up to 200 residential units on land at Broad Lane, Rochdale could provide:

- 1 C.£28m Construction Investment;
- 2 52 construction jobs annually and support an additional 78 jobs in the supply chain;
- 3 Generate £3.9m in residential expenditure supporting 49 jobs in the local economy;
- 4 £1.1m in New Homes Bonus Payment; and
- 5 Potential to provide apprenticeships and training opportunities.

Social

The proposed development will deliver a high quality sustainable residential development with integrated connectivity to the nearby employment development and will ensure that an attractive frontage is created along Broad Lane, a key gateway into Rochdale from Oldham. It will also provide suitable onsite public open space and promote community interaction and engagement

The proposed development will be delivered at an appropriate density with a suitable range of market homes. The development will also comprise a variety of onsite affordable homes with an appropriate tenure mix to meet the needs of the local community. The delivery of these units will assist in meeting the pent-up demand in the area for market and affordable units.

Environmental

The site at Broad Lane, Rochdale is currently in use for intensive agriculture and as such is of limited ecological value. It is anticipated that the proposed development will result in a net ecological gain given the provision and enhancement of habitats suitable for native species in the area. Taylor Wimpey will seek to retain and enhance the existing trees and hedgerows on the site as part of their development vision.

The site is sustainable, with good public transport links along Broad Lane and as such easy access to the services and facilities available in Rochdale Town Centre and Shaw. Taylor Wimpey envisages that the residential element of the development at this location will complement the employment site located to the east and strong pedestrian and cycle linkages will be created between the two elements of the overall allocation.

Taylor Wimpey has undertaken extensive due diligence on the site and considers that there are no technical or environmental constraints that could prevent or restrict the development of this site for residential purposes.

Deliverability

Taylor Wimpey considers that the overall proposed strategic allocation site is deliverable and developable when considered against the requirements of the Framework [§67 and Annex 2]. Furthermore, Taylor Wimpey's element of the site on Broad Lane is:

- 1 **Available:** Taylor Wimpey controls the site and is seeking to bring it forward for residential development at the earliest opportunity i.e. within the first five years post adoption of the plan in accordance with the masterplan.
- 2 **Suitable:** The site is well related to the existing urban area, benefits from being in close proximity to the services and facilities within Rochdale town centre and Shaw and provide an attractive setting along Broad Lane whilst screening the large-scale employment provision within the wider site.
- 3 **Achievable:** The land is not subject to any policy constraints or heritage, ecological, environmental or landscape designations and there is no significant constraint that will impede its delivery for residential development.

- 4 **Viable:** Taylor Wimpey considers that the site is viable but a definitive position will be made once the full suite of contributions and infrastructure requirements are set out in more detail in the emerging policy. As such, Taylor Wimpey reserves the right to comment further on the viability of the site.

Taylor Wimpey has previously promoted this element of the Kingsway South site for residential development in the last iteration of the GMSF. As part of this consultation, Taylor Wimpey has undertaken a detailed masterplanning exercise for the site which considered all site-specific constraints and opportunities and seeks to deliver a comprehensive vision for the site. Taylor Wimpey considers that the masterplan put forward achieves the Council's objectives for the site, constitutes sustainable development and is deliverable.

Taylor Wimpey has undertaken detailed technical analysis of their Broad Lane site and consider that there are no technical or environmental reasons why the site could not be delivered within the first 5 years post adoption of the GMSF and the site would contribute towards the Council's housing land supply.

The Green Belt

Exceptional Circumstances

There are exceptional circumstances which justify the removal of the land at Kingsway South from the Green Belt. These include the acute housing and employment land need across Greater Manchester including Rochdale and Oldham. The draft GMSF acknowledges that there is insufficient land within the built-up area to meet the longer-term housing and employment land requirements. This has been recognised by Rochdale and Oldham Councils in the latest iteration of the GMSF.

Green Belt Purposes

Taylor Wimpey welcomes the proposed removal of the site from the Green Belt but is concerned that the evidence base which has been prepared to justify the selection of the sites for removal from the Green Belt is not robust of sufficient. Taylor Wimpey considers that additional work is required to justify the site selection including a detailed and robust Green Belt Review.

Taylor Wimpey acknowledges the results of the Green Belt Assessment which was prepared in 2016 although disagrees with the findings in relation to the Kingsway South site. The Green Belt Assessment reviews the entire draft allocation and it is referenced as OH03 within the report. The Assessment for this site concludes that:

- 1 Purpose 1a considers whether land has already been affected by sprawl and whether it retains an open character - the GB Assessment consider that this site makes a strong contribution towards this purpose.
- 2 Purpose 1b considers the role strength of boundary features associated with the site - the GB Assessment consider that this site makes a strong contribution towards this purpose.
- 3 Purpose 2 seeks to prevent neighbouring towns from merging into one another - the GB Assessment consider that this site makes a strong contribution towards this purpose.
- 4 Purpose 3 seeks to assist in safeguarding the countryside from encroachment - the GB Assessment consider that this site makes a strong contribution towards this purpose.
- 5 Purpose 4 seeks to preserve the setting and special character of historic towns - the GB Assessment consider that this site makes a strong contribution towards this purpose.

Taylor Wimpey considers that the wider proposed allocation at Kingsway South no longer fulfils a Green Belt function for the following reasons.

- 1 Purpose 1a – The site does not make a strong contribution towards this purpose as suggested by the Green Belt Assessment as there a number of urbanising features along Broad Lane to the west and Milnrow Road to the east which affect the openness of the site. Secondly, there are a number of large and significant buildings on the site associated with the current agricultural uses on the site. Finally, the motorway to the north and the settlements of Newhey and Shaw are very prominent features and are highly visible from the majority of the site.
- 2 Purpose 1b – The proposed development of this site in line with the policy aspirations of retaining a protected area between Newhey and Shaw will protect the settlements form merging. Furthermore, the overall site has very strong boundaries on all sides with the motorway to the north, Broad Lane to the west, Shaw to the south and Milnrow Road and the settlement of Newhey to the eat.
- 3 Purpose 2 – The site makes a strong contribution towards preventing neighbouring towns from merging into one another particularly when it will be brought forward in accordance with a comprehensive masterplan. Furthermore, the draft policy seeks to retain a strategic area of Green Belt between Newhey and Shaw and the masterplan being put forward by Taylor Wimpey for the site strengthens the strategic break to ensure neighbouring towns don't merge. The presence of the M62 also prevents the mergence of Newhey and Shaw with Rochdale.
- 4 Purpose 3 – The site does not make a strong contribution towards this purpose as the site is contained by strong, defensible boundaries and the land is visually enclosed by the topography to the south and the M62 and large industrial buildings providing visual enclosure to the north.
- 5 Purpose 4 – The conclusions of the Green Belt Assessment in relation to the contribution the site makes towards preserving the setting and special character of historic towns. The detailed site assessment for OH03 states that the site is visible from the historic settlements of Chadderton, Littleborough, Milnrow, Rochdale (Town Centre), Royton and Shaw. However, these settlements do not constitute historic towns for the principle of meeting Purpose 4. Although these towns contain some listed buildings and other element of historical value, they are not historic towns in this context. As such, the release of this site from the Green Belt would not conflict with Purpose 4.

Policy GM Allocation 3 – Detailed Consideration

Taylor Wimpey fully supports the allocation of this site in the draft GMSF and has reviewed the detailed wording contained within the proposed policy. The Policy seeks to deliver a high quality missed use development in accordance with a comprehensive masterplan for the site. Taylor Wimpey prides itself on place making and delivering schemes of a high-quality design. As such, Taylor Wimpey wishes to support this element of the policy.

The Policy seeks to deliver 700 new homes providing a mix of high quality large properties and meet local needs to diversify the type of accommodation within the area to support the new jobs. Taylor Wimpey fully supports this policy aspiration and consider that the proposed vision for the site includes the delivery of a high quality, inclusive neighbourhood providing larger family properties to meet identified needs. Taylor Wimpey has reviewed the entire area of the draft allocations at Kingsway South and considers that their site on Broad Lane is ideally located to meet the policy aspirations particularly delivering properties in close proximity to the jobs which will be created by this allocation.

Residential development at this location will create an attractive frontage along Broad Lane, a key gateway from Oldham to Rochdale, and assist in screening the employment element of the site to the centre and north. However, it also it wishes to highlight a number of issues and concerns in relation to the specific wording of the proposed Policy.

Link onto M62

The Policy requires an access to and from the site in the form of a new connection from the M62 at an upgraded Junction 21 and a new over-bridge to link the site with Kingsway Business Park. Taylor Wimpey does not object to the principle of the junction improvements and the new over-bridge but further detail is required on how these infrastructure requirements will be funded. Taylor Wimpey's highway consultant considers that both access arrangements are achievable but will have a significant cost. If the intention is for the developers of the employment and residential development to fund this infrastructure requirement, it needs to be fully considered in any viability analysis conducted on this site to inform the emerging GMSF.

School, health and community facility

The Policy requires the provision of additional school places and appropriate provision of health and community facilities. Taylor Wimpey is supportive of the provision of appropriate facilities and services in close proximity to their sites as it assists in the creation of place. However, the policy as worded is vague and Taylor Wimpey requests that additional clarity is provided within the next iteration of the plan. Furthermore, once the policy wording is firmed up, the cost of providing the requisite school place, health and community facilities need to be fully considered as part of a detailed viability assessment for the site.

The Evidence Base

Taylor Wimpey has a number of concerns in relation to the wider evidence base associated with the GMSF and more detail is provided within Taylor Wimpey's overall representation on the GMSF.

In terms of the evidence base underpinning the proposed allocation of the Kingsway South site, Taylor Wimpey considers that viability evidence will need to be prepared which demonstrates that the site is viable for the development proposed taking into account the detailed policy aspirations.

Whilst Taylor Wimpey supports the proposed allocation of this site and its removal from the Green Belt, it is imperative that removal of the site is transparently and robustly justified with appropriate evidence. Furthermore, the proposed retention of an element of this site within the Green Belt to restrict the coalescence of Newhey and Shaw needs to be appropriately justified. Taylor Wimpey is concerned that this small element of Green Belt does not meet the Green Belt purposes and an alternative policy designation restricting development on this land may be more appropriate (i.e. Green Infrastructure or Green Gap policy) and more justifiable at Examination from a planning perspective.

Taylor Wimpey is also concerned that no formal Green Belt Review has been prepared to underpin this proposed allocation within the GMSF and all other sites. This is acknowledged by the Green Belt Topic Paper and Taylor Wimpey considers that it will be difficult to demonstrate that the GMSF is sound without a robust Green Belt Review underpinning the proposed allocations. On a related point, at §3.3 of the Green Belt Topic Paper, it states that a section entitled 'Further work required' is included at the end of the Topic Paper, however this appears to have been deleted from the published Topic Paper. Taylor Wimpey is very interested to understand what work GMCA considers is required.

Finally, Taylor Wimpey has concerns in relation to the robustness of the Site Selection Topic Paper. Although Taylor Wimpey's site is included in the assessment, very little commentary and explanation is provided to justify the inclusion of this site over others and explain how it meets the overall strategy of the GMSF. It is not clear what weight is attached to each criteria and the evidence is not as clear and transparent as it needs to be. Without detailed justification for this, and all other sites included as proposed allocations, it may be difficult to defend its inclusion during examination.

Conclusion

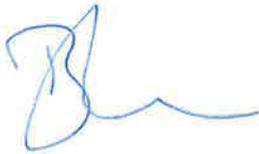
We look forward to receiving confirmation of the receipt of these representations and ask that they are given full consideration in preparing the next stage of the GMSF.

Taylor Wimpey is wholly supportive of the allocation of this site and agrees with the Council's identification of the site as a draft allocation in the GMSF and its removal from the Green Belt. However, there are a number of policy requirements that need to be considered in the context of the deliverability and viability of the development. Some of these requirements will require justification through robust evidence.

Should you have any questions or wish to discuss these representations further please do not hesitate to contact me.

We would welcome the opportunity to engage with relevant GMCA or Rochdale MBC Officers during the preparation process of the GMSF.

Yours sincerely



Brian O'Connor
Associate Director

Copy Kate McClean: Taylor Wimpey

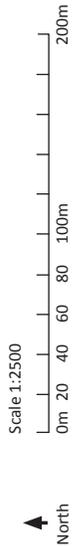
Key:

-  Existing trees/woodland
-  Proposed trees/woodland
-  Existing PROW
-  Existing bus stop
-  Potential site access
-  Proposed primary access
-  Proposed secondary access
-  Proposed development cell
-  Proposed houses
-  Proposed footpaths
-  Potential pedestrian/cycle link through employment park to Newhey Metrolink
-  Proposed LEAP
-  Proposed SUDS pond
-  Proposed noise bund
-  Proposed parking
-  Potential future employment

Broad Lane, Rochdale

Figure 7
Illustrative Masterplan

Drwg No: 727A 05 Date: 05.02.19
Drawn by: CAW Checker: CAW
Rev by: Rev checker:
QM Status: unchecked Product Status: Confidential Review
Scale: 1:2,500 @ A3



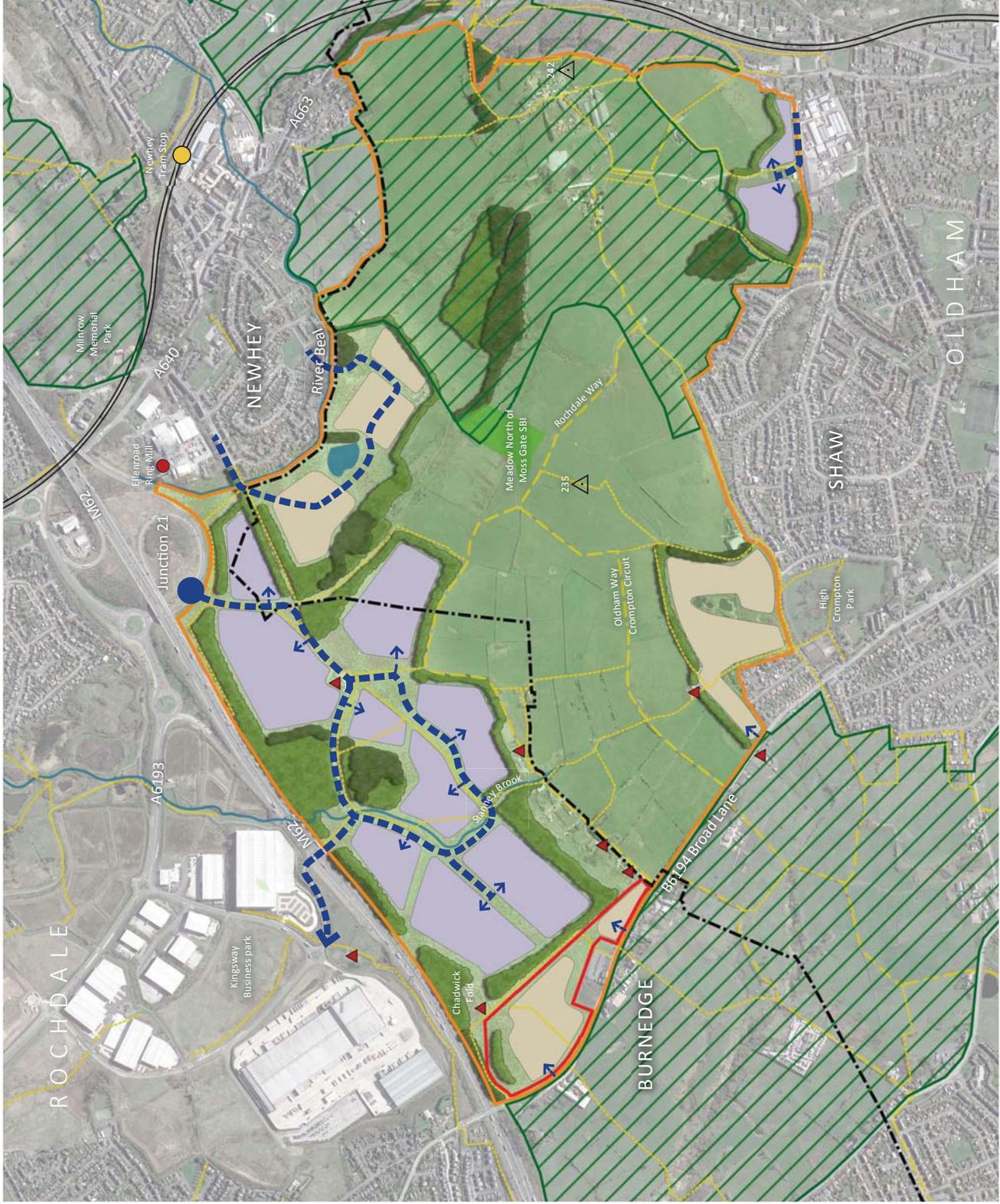
Key:

-  Site boundary
-  GMSF allocation boundary
-  Borough boundary
-  Tram link/ stop
-  Listed buildings
-  Scheduled Monument
-  Public Rights of Way (PROW)
-  National Trail/Long Distance Routes
-  Existing water course/body
-  Proposed Green Belt in GMSF 2019
-  Sites of Biodiversity Importance 2017 (SBI)
-  Existing woodland
-  Proposed structure planting
-  Potential residential development
-  Potential employment areas
-  Potential new roundabout
-  Potential highway connections
-  Trig points

Broad Lane, Rochdale

Figure 10
Kingsway South Concept Plan

Drwg No: 727A-10 Date: 15.02.19
 Drawn by: CD Checker: CAW
 Rev by: Rev checker:
 QM Status: checked Product Status:
 Scale: 1:10,000 @ A3 Confidential Review



Scale 1:10,000
 0m 100 200 300 400 500m 1000m
 North

Appendix 4 Gravel Bank Representation

Planning Team Consultation
GMCA
Churchgate House
56 Oxford Street
Manchester
M1 6EU

Submitted by email to: planningandhousing@greatermanchester-ca.gov.uk

Date: 18 March 2019
Our ref: 60409/01/JG/BOC/17093784v3
Your ref:

Dear Sir / Madam

Draft Greater Manchester Spatial Framework: Policy GM Allocation 26 – Gravel Bank Road / Unity Mill, Stockport

We write on behalf of our client, Taylor Wimpey UK Limited [Taylor Wimpey], in response to the consultation on the draft Greater Manchester Spatial Framework [GMSF]. These representations seek to promote the site at Gravel Bank Road, Woodley and provides a detailed response to Q.111 of the GMSF.

Background

These representations are made in the context of Taylor Wimpey's interests in Stockport, namely land at Gravel Bank Road, Woodley. Taylor Wimpey's land interest comprises the majority of the emerging draft allocation at Gravel Bank Road / Unity Mill (Policy GM Allocation 26) which is identified to deliver around 250 homes together with necessary supporting infrastructure and facilities. Taylor Wimpey controls all the land included in the draft allocation except the Unity Mill element of the site. That said, Taylor Wimpey has made contact with the owner of Unity Mill and both parties are willing to work with the owners to deliver a comprehensive vision for the overall allocation.

As set out in these representations and the Delivery Statement, Taylor Wimpey supports the removal of the land at Gravel Bank Road, Woodley from the Green Belt and its allocation for residential development on the basis that:

- 1 It would assist in the delivery of sustainable development;
- 2 The land does not fulfil Green Belt purposes and there is no alternative than to remove the site from the Green Belt; and,
- 3 There are no insurmountable constraints to its development and it is deliverable within the next five years.

Taylor Wimpey has made separate representations which sets out their position in relation to a number of other policies within the GMSF and the evidence base.

Structure of the representations

These representations will address:

- 1 Question 111: Do you agree with the proposed policy GM Allocation 36: Gravel Bank Road/Unity Mill?
 - a Sustainable Development
 - b Deliverability
 - c Green Belt
- 2 Allocation Policy GM Allocation 36 – Detailed Consideration
- 3 Evidence Base
- 4 Conclusions

Question 111: Do you agree with the proposed policy GM Allocation 36: Gravel Bank Road/Unity Mill?

Taylor Wimpey **strongly agrees** with the draft allocation for residential development at Gravel Bank Road/Unity Mill, Woodley. Taylor Wimpey considers that the proposed allocation of the site as illustrated on the accompanying masterplan constitutes:

- 1 Sustainable development;
- 2 Is deliverable in the first 5 years post adoption of the GMSF; and
- 3 The site no longer fulfils the purposes of including land within the Green Belt.

Points 1-3 will be dealt with in turn below.

Sustainable Development

The accompanying Delivery Statement demonstrates that the site is:

- 1 ideally located to create an attractive residential development; and
- 2 benefits from being within close proximity to a range of shops, services and facilities. The site is within walking distance (less than 800m) of the services available within Woodley Village Centre, Stockport Sports Village and Woodley Primary School. It is also highly accessible by public transport links including the Woodley Train Station and has access to the footpath along the Peak Forest Canal.

The site at Gravel Bank Road, Woodley would have positive economic, social and environmental benefits and will therefore constitute sustainable development in accordance with the Framework [§8].

Economic

The draft GMSF seeks to promote strategic growth across the whole of Greater Manchester and secure high levels of investment in the sub-region. Delivering residential development will aid this objective and the delivery of a sustainable residential development on land at Gravel Bank Road, Woodley could provide:

- 1 C.£13m Construction Investment;
- 2 48 construction jobs annually and support an additional 72 jobs in the supply chain;
- 3 Generate £1m in residential expenditure supporting jobs in the local economy;
- 4 £1.2m in New Homes Bonus Payment; and
- 5 Potential to provide apprenticeships and training opportunities.

Social

The proposed development will deliver a high quality sustainable urban extension to Woodley and will enhance the visual appeal of the Peak Forest Canal. The proposed development will be delivered at an appropriate density including a suitable range of market and affordable housing in a variety of house types, sizes and tenures that meet the needs of the local community. The delivery of these units will assist in meeting the pent-up demand in the area for market and affordable units. The proposed development will create a very attractive frontage to the canal and will provide ample onsite open space for existing and new residents.

Environmental

The site at Gravel Bank Road is currently in use for horse grazing purposes and as such is of limited ecological value. It is anticipated that the proposed development will result in a net ecological gain given the provision and enhancement of habitats suitable for native species in the area.

The site is highly sustainable, within walking distance of Woodley Village Centre and Woodley Train Station. Furthermore, the site benefits from easy access to the footpath along the Peak Forest Canal and benefits from very convenient access to Stockport Sports Village. Overall, there are no known technical and environmental constraints that could prevent or restrict development of the site.

Deliverability

Taylor Wimpey considers that their site is deliverable and developable when considered against the requirements of the Framework [§67 and Annex 2]. It is considered that the site is:

- 1 **Available:** Taylor Wimpey controls the site and is seeking to bring it forward for residential development at the earliest opportunity i.e. within the first five years post adoption of the plan.
- 2 **Suitable:** The site is very related to the existing urban area, benefits from being in close proximity to the services and facilities within Woodley village centre and residential development at this site would be fully compatible with the surrounding land uses.
- 3 **Achievable:** The land is not subject to any policy constraints or heritage, ecological, environmental or landscape designations and there is no significant constraint that will impede its delivery for residential development.
- 4 **Viable:** Taylor Wimpey consider that the site is viable but a definitive position will be made once the full suite of contributions and infrastructure requirements are set out in more detail in the emerging policy. As such, Taylor Wimpey reserves the right to comment further on the viability of the site.

Taylor Wimpey has previously prepared and submitted a masterplan for the development of their element of the allocation but can confirm that they are in discussions with the owners of Unity Mill to deliver a comprehensive redevelopment of the entire site. That said, it is considered that Taylor Wimpey's element of the site would be delivered at the outset to create a link to provide access to the Unity Mill site from Gravel Bank Road. Taylor Wimpey considers that there are no technical or environmental reasons why the site could not be delivered within the first 5 years post adoption of the GMSF and the site would contribute towards the Council's housing land supply.

The Green Belt

Exceptional Circumstances

There are exceptional circumstances which justify the removal of the land at Gravel Bank Road, Woodley from the Green Belt. These include the acute housing need in Stockport and that there is insufficient land within the built-up area to meet long term housing requirements. This has been recognised by Stockport in the latest iteration of the GMSF.

Green Belt Purposes

Taylor Wimpey welcomes the proposed removal of the site from the Green Belt but is concerned that the evidence base which has been prepared to underpin the removal of Green Belt sites is not robust or sufficient. Taylor Wimpey considers that additional work is required to justify the site selection including a robust Green Belt Review or the Council may be criticised during the Examination of the Plan.

Taylor Wimpey acknowledges the results of the Green Belt Assessment which was prepared in 2016, but disagree with the findings of the assessment in relation to the Gravel Bank Road site. The site forms part of site referenced SPO6 in the Green Belt Assessment which indicates that:

- 1 Purpose 1a considers whether land has already been affected by sprawl and whether it retains an open character – the GB Assessment considers that this site makes a strong contribution towards this purpose.
- 2 Purpose 1b considers the role strength of boundary features associated with the site – the GB Assessment considers that this site makes a moderate contribution.
- 3 Purpose 2 seeks to prevent neighbouring towns from merging into one another – the GB Assessment considers that this site makes a moderate contribution.
- 4 Purpose 3 seeks to assist in safeguarding the countryside from encroachment – the GB Assessment considers that this site makes a moderate contribution.
- 5 Purpose 4 seeks to preserve the setting and special character of historic towns – the GB Assessment considers that this site makes no contribution.

Taylor Wimpey considers that the site no longer fulfils a Green Belt function for the following reasons.

- 1 Purpose 1a – Taylor Wimpey considers that the site does not make a strong contribution towards this purpose because part of the site comprises a large redundant mill building, residential properties and large agricultural buildings. Furthermore, the assessed site does not have a significantly open character as it is enclosed by the canal to the north and west with residential development to the south. Given the characteristics of the site and the presence of a large urbanising feature on the site, it is difficult to understand how the site is assessed to contribute strongly to Purpose 1a.
- 2 Purpose 1b – Taylor Wimpey considers that the site does not make a strong contribution towards this purpose because the Green Belt Assessment (2016) outlines that only motorways, dual carriageways, railway tracks and rivers adjacent to the existing urban edge which have not been breached constitute strong and defensible boundaries. As such, it is difficult to understand how the assessment concluded that the site makes a moderate contribution to this purpose given that there is a canal bounding the site to the west and north with residential development to the south. The presence of the canal represents a strong defensible boundary in accordance with the Green Belt Assessment's own methodology.

- 3 Purpose 2 – Taylor Wimpey considers that the site does not make a strong contribution towards this purpose as the site is very well contained by defensible boundaries and the nearest settlement to the north is over 400m and on the other side of the River Tame valley.
- 4 Purpose 3 – Taylor Wimpey considers that the site does not make a strong contribution towards this purpose as the site is very well contained and will not represent an encroachment into the open countryside.
- 5 Purpose 4 – Taylor Wimpey agrees that this site makes no contribution towards this purpose.

The appended Delivery Statement provides further analysis on the purposes of the Green Belt in this location and demonstrates that the removal of the land at Gravel Bank Road from the Green Belt and its allocation for residential development will not harm the purposes of the Green Belt as set out in the Framework [§134]. It also shows that the principle of development on the land and its release from the Green Belt are acceptable on the basis that:

- 1 The proposed development site makes no contribution to meeting the five purposes of the Green Belt;
- 2 The development will round off the settlement of Woodley utilising the canal as a strong defensible and durable boundary whilst providing an attractive and sensitive urban edge; and
- 3 The site has the potential to help meet the urgent need for market and affordable housing within the Borough and the wider Greater Manchester area without harming Green Belt objectives in this location.

Policy GM Allocation 36 – Detailed Consideration

Taylor Wimpey fully supports the allocation of this site in the draft GMSF and has reviewed the detailed wording contained within the proposed policy. In particular, the policy is seeking to deliver a high-quality design, and a visually attractive scheme which establishes a strong sense of place. Taylor Wimpey prides itself on place making and delivering schemes of a high-quality design. As such, Taylor Wimpey wishes to support this element of the policy.

However, it also wishes to highlight a number of issues and concerns in relation to the specific wording of the proposed Policy.

Density

As set out in Taylor Wimpey's overall representation to the GMSF, and setting aside Taylor Wimpey's acknowledgement that the development on former Green Belt land should be maximised by appropriate densities as required by national policy [§122], the densities proposed on this site to deliver 250 units are inappropriate in this context. Taylor Wimpey is in discussions with the owners of Unity Mill and is willing to work with them towards delivering a comprehensive vision for the site. We understand that a number of units at a relatively high density could be delivered through the conversion of Unity Mill.

The draft policy (Part 1) sets out an aspiration to deliver '*a broad mix of housing types*'. Assuming the apartments delivered in the mill conversion will be smaller 1 and 2 bed properties, there will be a requirement to deliver larger family units on the site to deliver the mix of house types required by the policy. As such, a density of *** would be difficult to deliver. Furthermore, the site is located adjacent to a Conservation Area and the open countryside to the north. As such, it will be important to ensure a sensitively designed scheme is delivered on the site which is not overbearing and inappropriately dense. The delivery of a scheme with an average density of 70 dph would be out of character with the surrounding area.

Taylor Wimpey considers that a density in the region of 35dph would be far more appropriate given the surrounding environment, character of the area, site context and bearing in mind that the conversion of Unity Mill is likely to deliver a high proportion of smaller units.

Custom/Self-Build

Taylor Wimpey supports the delivery of affordable housing onsite where it is viable. The Policy sets out a requirement to deliver 30% affordable units across the site *'including provision for older persons' affordable accommodation and custom/self-build'*. Taylor Wimpey considers that the delivery of custom/self-build on this site is not appropriate and would affect the Council's aspiration to maximise the delivery potential of this site and deliver a comprehensive vision for the site. There are a number of smaller, less strategic, brownfield sites in Stockport which would be far more suited to the delivery of custom/self-build properties.

Furthermore, there is no evidence presented in this consultation which justifies the necessity or deliverability of self-build properties in the Council's strategic allocations. The necessity to provide self-build properties on Stockport's allocations should not be to the detriment of delivering a coherent and comprehensively planned residential development.

Emergency, Cycle and Pedestrian Access

Part 5 of the proposed policy sets out that the development should provide emergency, cycle and pedestrian access onto Gravel Bank Road, Hall Lane and Poleacre Lane. Taylor Wimpey is committed to providing a suitable access from their site on to Gravel Bank Road and contributing towards the delivery of a link between the two elements of the site. However, Taylor Wimpey questions the inclusion of Hall Lane within the policy wording. Hall Lane is located 150m south of the entrance of the Gravel Bank Road site and does not adjoin the proposed allocation. As such, in order to avoid confusion, Taylor Wimpey requests that reference to Hall Lane is removed from the policy wording.

Secondly, part 9 of the policy sets out that an emergency access, via the existing bridge should be used as an emergency access to the site. However, the inclusion of part 9 is effectively duplicating an element of Part 5 and both parts of the policy are unnecessary.

Road / Bridge Link

Taylor Wimpey is committed towards contributing proportionately towards the provision of a road/bridge link between the Unity Mill site and Gravel Bank Road site. However, the cost of this link must be considered when applying other development contributions on the site, for example onsite affordable housing and contributions towards school places, community facilities and health provision. Taylor Wimpey is committed towards making contributions towards all infrastructure and services requirements but this must not compromise the viability of the site.

Green Infrastructure

The policy seeks the delivery of onsite publicly accessible open space, green infrastructure as well as planting new generations of native mature hedgerows and trees. Taylor Wimpey considers that the delivery of onsite open space and planting of nature trees and hedgerows is vitally important in the creation of a high-quality neighbourhood but the allocation of appropriate space can impact on the developable area and density of the development. As such, Taylor Wimpey considers that the delivery of c.130 units on their element of the site, is more appropriate in this context and would deliver the Council's aspirations.

Finally, the policy is also seeking the retention and enhancement of existing landscape and natural features in order to achieve biodiversity net gain. Taylor Wimpey is committed to retention of existing natural

features where possible but this may affect the net developable area of the site and could affect the Council's aspiration to deliver 250 units on this site.

Development Viability

As set out earlier, Taylor Wimpey considers that the site is viable but the Council must fully consider the viability implications of the requests included within the Policy (i.e. affordable housing, education, road/bridge link, electric charging points, green roofs, permeable paving, health provision and community facilities). Without undertaking the requisite work to underpin the Policy, there is a risk that the Plan will be found unsound or the site may not be developed as required.

Taylor Wimpey is a responsible house builder but the Council must ensure that there is appropriate evidence in place to justify the necessity for all contributions and ensure that the proposed contributions accord with the CIL Tests. It is important that the Council does not try to impose onerous and unnecessary obligations on development sites.

The Evidence Base

Taylor Wimpey has a number of concerns in relation to the wider evidence base associated with the GMSF and more detail is provided within Taylor Wimpey's overall representation on the GMSF.

In terms of the evidence base underpinning the proposed allocation of the Gravel Bank Road site, Taylor Wimpey considers that viability evidence will need to be prepared which demonstrates that the site is viable for the development proposed taking into account the detailed policy aspirations.

Whilst Taylor Wimpey supports the proposed allocation of this site and its removal from the Green Belt, it is imperative that removal of the site is transparently justified with appropriate evidence. Taylor Wimpey is also concerned that no Green Belt Review has been prepared to underpin this proposed allocation within the GMSF and all other sites. This is acknowledged by the Green Belt Topic Paper and Taylor Wimpey considers that it will be difficult to demonstrate that the GMSF is sound without a robust Green Belt Review. On a related point, at §3.3 of the Green Belt Topic Paper, it states that a section entitled 'Further work required' is included at the end of the Topic Paper, however this appears to have been deleted from the published Topic Paper. Taylor Wimpey is very interested to understand what work GMCA considers is required.

Finally, Taylor Wimpey has concerns in relation to the robustness of the Site Selection Topic Paper. Although Taylor Wimpey's site is included in the assessment, very little commentary and explanation is provided to justify the inclusion of this site over others and explain how it meets the overall strategy of the GMSF. It is not clear what weight is attached to each criteria and the evidence is not as clear and transparent as it needs to be. Without detailed justification for this, and all other sites included as proposed allocations, it may be difficult to defend its inclusion during examination.

Concluding Remarks

We look forward to receiving confirmation of the receipt of these representations and ask that they are given full consideration in preparing the next stage of the GMSF.

Taylor Wimpey is wholly supportive of the allocation of this site and agrees with the Council's identification of the site as a draft allocation in the GMSF and its removal from the Green Belt. However, there are a number of policy requirements that need to be considered in the context of the deliverability and viability of the development. Some of these requirements will require justification through robust evidence.

Should you have any questions or wish to discuss these representations further please do not hesitate to contact me.



We would welcome the opportunity to engage with relevant GMCA or Stockport MBC Officers during the preparation process of the GMSF.

Yours sincerely

A handwritten signature in blue ink, appearing to read "B O'Connor". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian O'Connor
Associate Director

Copy K McClean: Taylor Wimpey