Date: 31 March 2017

Subject: GMSF: Greater Manchester’s Plan for Homes and Jobs. Update on Consultation

Report of: Councillor Richard Farnell, GM Portfolio Lead, Planning & Housing

PURPOSE OF REPORT

To update members of the Joint GMCA/AGMA Executive Board on the consultation on the draft GMSF and next steps

RECOMMENDATIONS:

GMCA/AGMA Executive Board is requested to;

1. Note the report
2. Agree the proposed timetable in Section 5.

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<th><strong>BACKGROUND PAPERS:</strong></th>
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<th><strong>TRACKING/PROCESS</strong></th>
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<td>Does this report relate to a Key Decision, as set out in the GMCA Constitution or in the process agreed by the AGMA Executive Board</td>
<td>No</td>
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<th><strong>EXEMPTION FROM CALL IN</strong></th>
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<td>Are there any aspects in this report which means it should be considered to be exempt from call in by the AGMA Scrutiny Pool on the grounds of urgency?</td>
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1. INTRODUCTION

1.1 The consultation on the draft GMSF closed on the 16 January 2017. Around 14,000 consultees\(^1\) on our databases were notified and around 25,000 comments have been received alongside several petitions.

1.2 It is not yet possible to give an absolutely definitive position on the responses received as there is considerable duplication (e.g. a number of residents have both emailed and posted their responses) and we are still processing responses received after the consultation closed.

1.3 22,500 of the 25,000 representations have been logged. Of these 1,500 are about thematic policies and issues (7%), the rest are about the site allocations.

1.4 Overall, the consultation was successful in promoting the draft plan and generated significantly more feedback than previous consultations. Responses were received from a wide range of interests such as housebuilders, landowners, community groups, pressure groups and individuals.

2. PROGRESS ON PROCESSING THE RESPONSES

2.1 The first priority is to upload all of the representations onto the consultation database and make them public. All of the representations submitted direct to the Consultation Portal have been processed. Additional resources have been obtained and 7 temporary agency staff have been recruited to help with the processing of the representations received by email and letter.

2.2 Most respondents did not use the consultation portal to submit responses, although it was used to access and download documents. It is clear that in terms of capturing and processing the representations this is by far the most efficient method. Work is underway to improve the public facing element of the portal and understand the barriers and difficulties experienced so that in the future this becomes the most convenient option. If this is not achieved the time and resources to manage further consultations will need to be significantly increased.

\(^1\) For the avoidance of doubt the following terminology is used in this report

- **Consultees** are people on our database that we notify of consultation periods – i.e. people we directly invite to comment.
- **Respondents** are consultees who actually make comment(s).
- **Representations** are the emails/letters sent in by a respondent as a whole
- **Comments** are individual points made on specific policies
3. INITIAL ISSUES

3.1 Detailed analysis of the representations is still underway. The following issues are emerging from the early analysis although this is clearly a partial list and will be added to once all of the responses have been analysed.

- Strong overall support that a plan is needed and for the vision
- General support for the thematic policies but concern that the allocations are inconsistent with these
- Lack of balance between weight given to jobs and homes and the natural environment
- Concern over the robustness of the economic and demographic forecasts - particularly in terms of the impact of Brexit
- Economic forecasts are not ambitious enough
- Alternatively the housing figures are too high (CPRE 9,894 dwellings per annum, 197,885 over 20 years) or too low (HBF in excess of 14,622 pa, 292,440 over 20 years, or the Housing the Powerhouse ‘policy on’ figure of 16,643 pa 332,860 over 20 years)
- Current land supply is constraining growth. There is too much focus on apartments in the urban core and there is a need for more family housing.
- Brownfield land/empty homes and shops have been ignored and should be developed first.
- Existing land supply has been taken at face value and viability of bringing it forward has not been established.
- ‘Exceptional circumstances’ for release of Green Belt has not been demonstrated.
- The site selection process needs to be transparent – it’s unclear why some sites have been discounted and others chosen.
- Concern that this is the first that residents have heard about the plan and the title “spatial framework” is confusing to most people.
- Concern over the environmental impact of Green Belt release.
- Concern over impact of further development on infrastructure (in particular transport and social) perceived to be at or near capacity.
- Mix and type of housing – needs a range of affordable housing.
- Support for the intention to fulfil the city region’s full economic potential but this must be within environmental limits.
- Given Brexit, the spatial framework should have strong environmental protections in place that can stand alone – on issues from air quality to water and wildlife protection.
- Important to ensure that development associated with the GMSF does not increase risk such as flooding.
- Concern from utility providers regarding large sites which are in multiple ownerships. Experience is that sites in multiple ownerships can be compromised by developers working independently.
4. **SITE ALLOCATIONS RESPONSE**

4.1 The majority (93%) of the responses logged to date relate to the proposed site allocations. The sites which have received the most responses to date (over 1000) are listed below;

- NG 2 – Land east and west of M627M (Oldham and Rochdale)
- NG 3 – Junction 21 of M62 (Oldham and Rochdale)
- OA 1 - North Bolton Area of Search (Bolton)
- OA 3 – Walshaw (Bury)
- OA 24 - Sidebottom Fold (Tameside)
- WG 4 – land at Flixton Station (Trafford)
- OA 2 - Elton Reservoir Area (Bury)
- M6C 1 – Junction 25 (Wigan)
- OA 10 - Hanging Chadder (Oldham)

4.2 In addition, petitions have been received in respect of the following allocations;

- M6C2 Junction 26 (Wigan)
- OA9 Cowlishaw (Oldham)
- WG2: Western Cadishead and Irlam (Salford)
- NG1b South of M62 (Bury and Rochdale)
- OA3 Walshaw (Bury) and other Call for Sites in this area
- WG1 New Carrington (Trafford)
- All Green Belt sites around Bury
- OA21 High Lane (Stockport)
- OA24 Sidebottom Fold (Tameside)
- OA12 Robert Fletchers (Oldham)
- EG1 Little Moss / Ashton Moss (Tameside)
- OA13 Bamford/Norden (Rochdale)
- All Green Belt sites across Greater Manchester

4.3 A full analysis of the representations is underway. A consultation report will be produced which will identify the issues raised and the proposed response to these, to accompany the next stage of the consultation.

5. **TIMETABLE**

5.1 The current published timetable provides for consultation on the Publication Plan in June/July. In the light of the consultation responses received and the further work needed it is recommended that consultation on the next stage of the plan should be moved to September. The regulations require a formal consultation of at least 6 weeks. It is proposed that all future consultations will be for 12 weeks.

6. **RECOMMENDATIONS**

6.1 Recommendations are found at the front of the report.