

Manchester Core Strategy Development Plan Document

Consultation Statement July 2011

Consultation Statement pursuant to Regulation 30 (1) (e) of the Town and Country Planning (Local Development) (England) Regulations 2004 as amended



**MANCHESTER
CITY COUNCIL**

1.0 Introduction

- 1.1 All local planning authorities have to produce a Local Development Framework (LDF) which will set out planning policies for the local authority area. The LDF is made up of Development Plan Documents (DPDs) and Supplementary Planning Documents, as well as a Local Development Scheme which describes the function of each document and sets out a timetable for document preparation. DPDs will form the development plan for Manchester; and the Core Strategy is the most important of these, setting out strategic planning policies for the development of Manchester until 2027.
- 1.2 The preparation process for Manchester's Core Strategy began in 2005 and the public and other stakeholders have been involved in its production at all stages since then. This is set out in the 'Regulation 30 (1) (d) Consultation Statement' (which accompanies the Submitted Core Strategy). Now reaching the final stages of the process, the Council submitted its Core Strategy to the Secretary of State on 18th July 2011. The next stage will be independent examination of the Core Strategy which will take place towards the end of 2011.
- 1.3 The Town and Country Planning (Local Development) (England) Regulations 2004 as amended in 2008 and 2009 require councils to prepare two consultation statements to accompany DPDs when they are submitted to the Secretary of State; one setting out how stakeholders have been involved in the earlier stages of preparing the DPD, and a second relating to representations received at the Publication stage. This document is the second consultation statement and the regulations (Reg 30) state that this consultation statement must set out:
 - If representations were made at Publication stage: the number made and a summary of the main issues which were raised; and
 - That no representations were made, if this was the case.

2.0 Publication Consultation stage

- 2.1 Manchester City Council consulted on its Publication Core Strategy between 10th February and 24th March 2011. The Core Strategy was made available on the Council's website and hard copies could be viewed in libraries across the City and in the Council's Customer Services Centre. Everyone on Planning's Local Development Framework database was notified of the consultation period and was told how representations could be made. The database comprises a wide range of people and organisations including community groups, pressure groups, civic societies, members of the public, representatives from national organisations, housing associations, developers and consultants. A list of the organisations currently on the

database is provided in Appendix 1 of the Regulation 30 (1) (d) Consultation Statement.

2.2 During the Publication consultation period 282 representations were received from 52 organisations/individuals. The Economy, the City Centre, Housing, Centres and the Environment were the sections that received the largest number of representations. The main issues raised in representations are set out in the table below under the topic area to which they relate.

Topic area	Main issues raised in representations on these topics
Economy and Airport	<ul style="list-style-type: none"> • A number of representations sought clarity on the type of employment uses which should be in centres, especially in relation to the Regional Centre. • A representor sought clarity in Policy EC1 Employment and Economic Growth in Manchester that the 200ha employment land figure was a minimum. • Policy EC2 Existing Employment Space was considered too restrictive and representors requested greater flexibility. A number suggested alternative uses should be permitted if a proposal met other objectives of the Core Strategy. There was also concern that the policy read alongside other polices created inconsistency. • A number of representors wanted ancillary uses permitted alongside employment uses to help create employment destinations. • References to accessibility should be added to some policies. • Figure 8.4 Central Park should be shown in an indicative way. • Policy EC6 Central Park should be reworded in order to allow a full range of employment uses across the whole of Central Park. • Policy EC8 Central Manchester should promote a mix of employment uses along Stockport and Hyde Road. • Representors considered that the expansion of Manchester Airport was not sustainable and conflicted with the Sustainable Development objective of the Core Strategy and the aim of cutting carbon. Concern was also expressed that expansion of the Airport was not in accordance with national policy and the Climate Change Act. • Supporting the economic growth of the City should not be considered a justification to expand Manchester Airport. • The reasoned justification supporting Policy MA1 should seek to compensate for the loss of Ancient Woodland. • The SEMMMS Road scheme should not be referred to in the Core Strategy as it is not supported by national policy, NWRSS or other Core Strategy Policies. • Exceptional circumstances do not exist to remove the Green Belt at the Airport. Also Oak Farm should not be removed from the Green Belt because it is not needed for the expansion of the Airport.

	<ul style="list-style-type: none"> • Growth of the Airport could undermine growth of the Regional Centre. • Rolling back the Green Belt at the Airport could impact on the integrity of the wider Green Belt and the Timperley Wedge. • Concern was expressed that the consultation results relating to the preferred option for expansion of the Airport have been ignored. • Concern has been expressed that the expansion of Manchester Airport will adversely impact on air quality, noise, traffic and the general health of those living close to the Airport.
City Centre	<ul style="list-style-type: none"> • Concern was expressed that Figure 8.3, showing indicative expanded Primary Shopping Areas in the City Centre, should be dealt with through a Site Specific Development Plan Document. Representors believed that there was not enough evidence to justify including the proposed areas in the draft Core Strategy. • Policy CC7 Mixed Use Development was considered by representors to be too onerous on developers to demonstrate “maximum reasonable” contribution to employment and that it was too open to wide interpretation.
Housing	<ul style="list-style-type: none"> • A number of respondents were concerned that the set of bullets at the end of H1 (Overall Housing Provision), which the policy states all proposals for new development must comply with, was unrealistic. Respondents thought that it should be made clear that every single residential scheme should not be expected to meet all of these requirements. • Representations stressed the need for flexibility in the plan to address housing needs. • References to accessibility should be added to policies. • A number of amendments were proposed to Policy H9 (Accommodation for Gypsies and Travellers and Travelling Showpeople) to make this policy more effective. • Policy H10 should be amended to better reflect the commitment to disabled and older people’s accommodation made elsewhere in the Core Strategy and to meet the Disability Equality Duty for public authorities. • A large number of representations were received on policies H11 (Houses in Multiple Occupation) and H12 (Purpose Built Student Accommodation). Representations on H11 were split between making the policy more or less restrictive. • Jackson’s Brickworks should be shown as a site potential for housing.
Centres	<ul style="list-style-type: none"> • A number of consultees emphasised the need to ensure that retail development reflects the City’s centre hierarchy. • There was some support for the growth of large-formal retail, particularly in the City Centre, although the contribution of the independent sector was also recognised. • There was concern that the approach to the assessment of impact for out-of-centre retail proposals was overly

	demanding and was not justified.
Environment	<ul style="list-style-type: none"> • General support for design and tall buildings policies. • Support for the role of canals in helping towards biodiversity, creating a sense of place and green infrastructure, but ask that specific mention should be made of both the Bridgewater Way initiative and a related implementation strategy. • Several comments were received with regard to EN5 and EN6 - that policies should not adversely affect the supply and pace of housing development; that the local carbon target is significantly over the national target, will be overly onerous and restrict housing from coming forward; that no evidence has been shown to demonstrate that the policy is deliverable or flexible and it is therefore unsound. • That EN6 is too complicated; that no proper justification has been given for the targets; that developers would have to incur significant costs and delays in the preparation of applications; that Trafford's draft policy was similar and has had to be rewritten. • That EN6 targets should be guidelines rather than mandatory and should not exceed Part L of Building Regs. • That standards for indoor sports facilities have not been included and that an update of the Playing Pitch Strategy is needed. • Flood Risk - A dispute has been raised concerning what is the most up-to-date flood risk assessment of the Bridgewater Canal upon which the Core Strategy should be based.

3.0 Conclusion

- 3.1 The Schedule of Suggested Changes to the Core Strategy for Submission sets out the changes which the Council propose to make to the Publication Core Strategy document. This schedule has been submitted alongside the Core Strategy.
- 3.2 The majority of changes set out in the schedule are being proposed to correct typing errors and/or provide greater clarity in response to representations and to reflect the current situation. The Council considers that the Publication Core Strategy was 'sound' therefore none of the changes are needed to make unsound policy sound.