



The Planning
Inspectorate

Report to Manchester City Council

by Jill Kingaby BSc(Econ) MSc MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 26 March 2012

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION OF MANCHESTER'S LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 18th July 2011

Examination hearings held between 22nd and 25th November 2011

File Ref: PINS/B4215/429/9

Abbreviations Used in this Report

AA	Appropriate Assessment
AGMA	Association of Greater Manchester Authorities
[CD]	Core Document (in the Examination library)
CIL	Community Infrastructure Levy
DPD	Development Plan Document
ETS	Emissions’ Trading Scheme
has	hectares
LDS	Local Development Scheme
LTP	Local Transport Plan
MM	Main modification
NPPF	National Planning Policy Framework
PPS	Planning Policy Statement
RS	Regional Strategy
SA	Sustainability Appraisal
SBI	Site of Biological Importance
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEMMMS	South East Manchester Multi-Modal Study
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
Sqm	square metres
SSSI	Site of Special Scientific Interest
UDP	Unitary Development Plan

Non-Technical Summary

This report concludes that the Manchester Core Strategy Development Plan Document provides an appropriate basis for the planning of the City over the next 15 years providing that a number of modifications are made to the plan to make it sound. The Council has specifically requested that I recommend any modifications necessary to enable it to adopt the Plan.

The principal modifications can be summarised as follows:

- Update the forecasts for growth at Manchester Airport so as to reflect the UK Aviation Forecast published in August 2011;
- Amend the housing trajectory in Policy H1 and add a table to show clearly where and when new housing will be provided;
- Change Policy H11 (Houses in Multiple Occupation) so that it is justified and sufficiently flexible for the plan period, and to clarify that more detailed guidance will follow in a subsequent Development Planning Document;
- Clarify and strengthen the policies and text to combat climate change and secure reduced carbon emissions; and
- Update Policies EN19 and EN20 and supporting text to achieve consistency with the recently examined Joint Waste Development Plan Document and the submitted Joint Minerals Development Plan Document.

All of the modifications in this report are based on proposals put forward in response to points raised and suggestions discussed during the public examination. The modifications do not alter the thrust of the Council’s overall strategy.

Introduction

1. This report contains my assessment of the Manchester Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Publication Consultation Core Strategy (February 2011) plus the Schedule of Changes to the Core Strategy put forward at submission stage, July 2011 [CD2].
3. My report deals with the main modifications that are needed to make the DPD sound and they are identified in bold in the report (**MM**). In accordance with Section 20(7C) of the 2004 Act, the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound or not legally compliant, and thus incapable of being adopted. These Main Modifications are set out in the Appendix. None of these materially alters the substance of the plan and its policies, or undermines the sustainability appraisal and participatory processes undertaken. All the main modifications were subject to public consultation following the hearings and I have taken the consultation responses into account in writing this report.

Preamble

4. The Core Strategy is also referred to as ‘the plan’ or the ‘local plan’ in my report. Since the Publication consultation version was issued in February 2011, a number of changes to planning policy have been made or proposed by Central Government. I invited comment on these before and at the Hearings, and the changes are addressed in this report.
5. The National Planning Policy Framework: Consultation Draft (NPPF) was published in July 2011. It represents a material consideration for this examination but, owing to its draft status, currently carries only limited weight. In November 2011 just before the Hearings, the Localism Act received Royal Assent. This means that no further Regional Strategies (RS) will be prepared. However, existing RSs including the North West of England Plan – Regional Spatial Strategy to 2021 [CD2.1] remain in force pending any response to the consultation on environmental assessment initiated by the Department for Communities and Local Government, and further orders being laid before Parliament. The North West of England Plan therefore is currently part of the development plan for Manchester.

Main Issues

6. Taking account of all the representations, written evidence and the exchanges at the Examination Hearings, I have identified seven main issues upon which the soundness of the plan depends. These are discussed below.

Issue 1 – Whether the strategy for Manchester over the next 15 years meets the expectations of Planning Policy Statement 12: Local Spatial Planning (PPS12) and is clearly articulated.

7. Chapter 2 of the plan provides a summary of key historical, geographical and socio-economic factors relevant to the City, and explains that it is sub-divided into five Regeneration Areas along with the City Centre. The key challenges for the future, at Citywide and Regeneration Area level, are identified in the chapter. The role and importance of the Association of Greater Manchester Authorities is referenced, and Chapter 3 describes the Greater Manchester Strategy which sets out strategic priorities for the City Region. The Core Strategy will provide the planning policy to deliver the City Centre Strategic Plan and Strategic Regeneration Frameworks. A close relationship of the plan to Manchester’s Sustainable Community Strategy 2006-15 is described. A Vision to 2027 based on the factual information in the early part of the plan is set out in Chapter 4, with related spatial objectives in Chapter 5.
8. Although there are a number of non-statutory plans in place, the spatial priorities in the Greater Manchester Strategy emerged through the RS, which provided a statutory context. The Regeneration Areas, reflected in Manchester’s Unitary Development Plan (UDP) and the geography of the City, are well-established and functional, with many public service delivery programmes based on them. I am satisfied that the existence of these plans, and their treatment in the Core Strategy, should not undermine its authority. The general approach outlined in the early chapters leading up to the overarching Policy SP1: Spatial Principles is consistent with PPS12, sections 2 and 4, concerning the Nature of Local Spatial Planning and the Nature of Core Strategies.
9. The plan refers to the City Centre (Policy CC1) and the Regional Centre (Policies SP1 and EC3). There are also references to City Centre Fringe and to Inner Areas. Although these may initially appear to be unduly complex, the four areas have distinctive roles within the context of the local authority area and Greater Manchester. The City Centre should be the focus for commercial, retail and leisure uses. The Regional Centre goes beyond the City Centre and reflects the importance of promoting opportunities for regeneration. Some activity that may benefit agglomeration, such as industrial uses, would not be appropriate in the City Centre. The City Centre Fringe could accommodate other employment uses which would benefit from a central location but may not be able to afford city centre accommodation. Paragraph 8.27 explains the City Centre Fringe area. Policies SP1 and H1 clarify the role of the Inner Areas in respect of new residential development. Close reading of the plan confirms that identification of the four areas is justified and appropriate.
10. The Key Diagram, Figures 8.1 and 8.2 define the relevant areas indicating that they extend beyond the boundaries of Manchester City Council’s area. The approach to City and Regional Centres has been developed in collaboration with neighbouring Districts and statutory bodies who have raised no objection to the plan.
11. In accordance with paragraph 4.1 of PPS12, the plan sets out how much development is intended to happen where and when, notably in Policy EC1 on employment and economic growth, and in Policy H1 on housing. The plan

includes a single strategic site at the Airport which is the subject of Policy MA1 for which specific proposals are put forward. The site boundaries are shown in Figure 8.8 and on the Key Diagram, and will be added to the Proposals Map. Alternative boundaries were considered in preparing the plan. The Core Strategy also includes a number of strategic locations which will accommodate a substantial proportion of future residential and commercial development. A number of these are shown on figures in the plan, but their boundaries are indicative only, and paragraph 8.57 confirms that more detailed proposals for these locations will be included in the Site Specific Allocations DPD. The approach to strategic sites is consistent with paragraphs 4.6 and 4.7 of PPS12.

12. The Key Diagram should illustrate the plan more clearly. The Council has proposed modifications to show the Green Belt, transport network and strategic housing location, and the relationship to neighbouring local authorities which I support **(MM1)**. Appendix C of the plan lists the policies in Manchester UDP which will be superseded by the Core Strategy. During the Examination it was realised that not all the relevant policies had been included and the Council, appropriately, proposed to extend Appendix C to overcome this shortcoming and make the plan sound **(MM23)**.
13. With the proposed changes, I conclude that the early chapters, general approach and Policy SP1 meet the expectations of Planning Policy Statement: 12 Local Spatial Planning (PPS12) and are clearly articulated.

Issue 2 – Whether the policies and proposals for economic development and employment space are sound; in particular whether the plan promotes an appropriate balance between growth of the Regional Centre and growth in the area around Manchester Airport.

14. The introductory sections of the plan make clear that securing economic growth, regeneration, and tackling worklessness and deprivation are important priorities for the future of Manchester. After defining the overall spatial principles which will guide the development of Manchester to 2027, the plan immediately addresses the Economy and City Centre. This positive approach to economic development is in line with the Minister’s Planning for Growth Statement and the Draft NPPF. The Core Strategy is justified by a number of economic studies including the Manchester Economy and Employment Space Study, the Manchester Independent Economic Review and PPS4 Compliance Statement [CDs 9.6, 9.8 & 9.9].
15. The RS [CD2.1] emphasises that the Regional Centre of Manchester should be the priority location for economic development (eg. Policies RDF1 and W2). Policy SP1 of the plan states that the Regional Centre will be the focus for economic and related business development. The boundary of the Regional Centre in Manchester was defined from Policy MCR2 of the RS taking account also of the text in paragraphs 10.6 and 10.7. The boundaries have not been challenged by neighbouring Districts or others. I consider them to be justified.
16. In addition to defining the Regional Centre as the focus for development, Policy SP1 expects Manchester Airport to provide a catalyst for the regional economy providing the impetus for a second hub. Policy EC1 of the plan includes indicative figures for the future growth of employment land, of around 123has in the Regional Centre and 50has in Manchester Airport and the surrounding area. Whilst acknowledging the primacy of the Regional Centre,

the approach encourages growth associated with the Airport and the nearby University Hospital in South Manchester. As confirmed in paragraph 8.14 of the plan, the Regional Centre with the City Centre includes the largest concentration of economic activity in Manchester City Region. The City Centre contains some 160,000 jobs and these are expected to grow by an additional 18,000 by 2027.

17. Policies for the City Centre, notably CC1, and for other parts of the Regional Centre, such as Policies EC4-8, identify significant potential for new commercial development in a number of sub-areas. The Regional Centre offers new and expanding businesses the benefits of agglomeration, a large labour pool and good accessibility by a variety of public transport modes to all parts of Greater Manchester. These factors and the strength of the existing centre, being the regional focus for financial and professional services with the Universities and hospitals, and offering wide opportunities for retail, leisure and cultural development, should support its continuing future success.
18. Concern was expressed that growth around the Airport could displace activity that would be better placed in planning terms in the Regional Centre. It was queried whether sites around the Airport would attract only businesses which needed a direct link to the international airport and would not come to the area otherwise. In the current economic climate with poor access to finance and low demand, it was argued that there should be unequivocal support for the Regional Centre. In addition to a harmful economic impact, the proliferation of peripheral business parks, it was claimed, would encourage increased travel to work by car and higher carbon emissions. These outcomes would conflict with the plan’s first spatial objective, ie. the sustainable development of the City and slowing down climate change.
19. Significantly, the Budget in March 2011 identified Manchester Airport/Airport City as an Enterprise Zone implying that industry and office development should be encouraged there. The Council’s proposed change prior to submission to paragraph 8.83 of the plan would add a reference to the Enterprise Zone [CD2]. Although the plans for the Enterprise Zone refer to 115ha of employment land, this figure includes existing provision and the figures for employment land in Policy EC1 need not be amended. The Council confirmed that the projected 21,000 jobs in the Enterprise Zone would include a minimum of 7,000 new jobs; the remaining 14,000 new jobs would only be displaced from elsewhere in Greater Manchester including the Regional Centre under the worst case scenario. However, the Regional Centre should be sufficiently large, diverse and dynamic to adjust to this.
20. It would not be possible to identify particular land use classes or sectors (eg. B8) which should/should not be permitted in the Enterprise Zone. However, Policies EC10 and EC11 are supportive of aviation-related development. The Manchester Airport Group and other stakeholders are committed to promoting the world freight terminal and creating new space for global businesses. In view of the proximity to Wythenshawe Hospital, opportunities to develop healthcare and advanced manufacturing industries exist, and Policy EC12 promotes these. Existing employment sites in Wythenshawe are also to be encouraged to grow to enhance the cluster of employment uses. Thus, the plan makes clear that a different mix of businesses is expected in the south of the City from that which prevails in the Regional Centre. The third paragraph

of EC11 reinforces the point that development near the Airport should complement the Regional Centre and other centres in Greater Manchester.

21. Policies RT5 and W2 and paragraph 8.20 of the RS indicate that regionally significant business development should be located close to sustainable transport nodes within urban areas. Paragraph 8.86 of the local plan describes Airport City as an “edge of centre location for office uses”. It is self-evident that the area is not as accessible as Central Manchester by public transport from all directions, with a substantial resident population in easy walking or cycling distance. However, PPS4, Annex B footnote 16 confirms that, as the Airport contains a public transport interchange with heavy rail, coach and local bus services, as well as the Metrolink service scheduled for opening in 2016, the “edge of centre” description is justified.
22. I am satisfied that the plan seeks to maximise the potential which the centre of Manchester and the Airport afford, and has had due regard to the need to achieve sustainable development which contributes to halting climate change. In addition, with continuation of the schemes described in paragraph 8.10 of the plan and private-sector led initiatives for skills’ development, the planned expansion around the Airport should help to reduce the acute problems of deprivation in and around Wythenshawe.
23. At the publication stage of Manchester’s plan, Trafford Council sought reassurance that there would be no highway link through the Davenport Green area where Trafford proposed an extension to the Green Belt. However, Trafford is now supportive of development at Airport City and states that it would lead discussions with stakeholders to evaluate opportunities for Davenport Green to support Airport City and/or Medipark including the need to secure access and effective linkages with the rest of the Enterprise Zone. The neighbouring Council is now content with this section of Manchester’s plan.
24. Policies for the City Centre in the Core Strategy reflect national policy especially Policies EC3 and EC4 of PPS4. They address the diversity of functions and the necessary interaction of economic, retail, housing, design and transport policy. Manchester/Salford is recognised in Policy W5 of the RS as one of two primary retail centres in the North West, where plans should promote retail investment to assist regeneration and economic growth. The Council’s Quantitative Need for Additional Retail Floorspace Up-Date 2010 [CD11.3] supports the figure of approx. 70,000sqm net comparison and additional convenience floorspace as implied in Policy CC2. A minimum of 4,500 sqm new convenience retail floorspace will be provided in the City Centre over the plan period. Modification of the policy to make clear that food store provision should be within the City Centre or “in accordance with the sequential approach” should be made to achieve soundness **(MM2)**.
25. Many urban areas have experienced decline in independent convenience shops in recent years at a time when supermarkets and superstores have expanded. Studies in the Chorlton area, it was argued, had indicated that the contribution made by independent retail outlets to shopping provision had been underestimated when forecasts of retail requirements had been prepared. However, the Council’s most recent retail assessment looked at expenditure capacity and the attractiveness of particular centres rather than at a particular business model. The text in the plan gives support for a larger format convenience

store, based on evidence of significant leakage of expenditure to large food stores outside the central area, coupled with an expected growth in population in the City Centre. Policy CC2 acknowledges and supports the role and growth of the independent retail sector. I consider the policy approach to be justified and sufficiently flexible as to the type of retail outlet which may be developed.

26. Policies C1-C10 of the plan address centre hierarchy and define a network of district and local centres across the city. These are based on good evidence as to how existing centres operate and the likely future needs of resident communities. Overall, I conclude that the policies and proposals for economic development and employment space are sound. The plan promotes an appropriate balance between growth of the Regional Centre and growth in the area around Manchester Airport.

Issue 3 – Whether the plan’s expectations about the expansion of Manchester Airport are up to date and justified, and are consistent with its vision and spatial objectives for sustainable development and meeting the challenge of climate change.

27. According to Policy RT5 of the RS *“Plans and strategies should support the economic activity generated and sustained by the Region’s airports, in particular, the importance of Manchester Airport as a key economic driver for the North of England ...”*. The Future of Air Transport White Paper 2003 forecast long term growth for Manchester Airport having considered aviation growth nationally. The Core Strategy acknowledges that the forecasts have been revised downwards to take account of the impact of climate change policies. In March 2011, the Government issued a scoping document for consultation: Developing a sustainable framework for UK aviation. The intention is to produce a new, greener aviation policy but this is unlikely to be in place before March 2013. The 2003 White Paper is described as “fundamentally out of date” but it remains Government policy on aviation.
28. The scoping document states that air transport provides the international connectivity the country needs to succeed in a competitive global economy. On aviation and the economy, Government wishes to explore how aviation growth can occur, whilst ensuring that it is genuinely sustainable. The aviation sector covers a diverse range of activities from passenger transport to freight, aerospace and aircraft maintenance. The document reflects recent decisions not to permit new runways at Heathrow, Gatwick and Stanstead. Such constraints may channel some growth to Manchester Airport. Whether or not this is the case, the Council proposed modifications to Policy MA1 and paragraph 8.92 to refer to the most up to date growth estimates. These should be made to justify the policy **(MM4 and MM5)**.
29. Concerning sustainability, the Airport is committed to reduce carbon emissions in its own control from vehicles and surface access, use of energy and from aircraft on the ground. It is on target to be carbon neutral for energy and fuel use by 2015. Regarding aircraft movements, the aviation sector will enter the European Union Emissions’ Trading Scheme (ETS) in 2012. This imposes an overall limit on carbon emissions from aviation. If emissions exceed the limit, the sector will have to buy the necessary permits, paying for reductions to be made elsewhere. Fuel efficiency and other measures were used to inform revised national forecasts for aviation growth in August 2011. Whilst some

will consider that these measures do not go far enough to secure a sustainable future, the latest passenger forecasts from the Department for Transport, which reportedly take account of the need to address the effect on climate change, show an increase from some 20 million in 2010 to 35 million in 2030 for Manchester.

30. The local plan advises that an airport’s capacity needs to be able to handle its busiest period rather than the average passenger throughput. Evidence from the Manchester Airport Group shows that, despite a drop in total passenger numbers from 2008 to 2010, traffic peaks did not change significantly. Therefore, even if the figure of 45 million passengers per annum in the supporting text to Policy MA1 is too high, it does not follow that the proposed plan for airport expansion is unjustified.
31. Manchester Airport - The Need for Land, 2010 [CD10.6] identifies essential uses and facilities for the Airport’s operation to 2030. It takes account of passenger handling requirements and air cargo movement, aircraft maintenance and ancillary uses such as fire and rescue services. New hotel accommodation for passengers and aircrew in transit are also planned, closely located hotels being necessary to support the Airport’s functions. Surface access and car parking requirements have been calculated on the basis of substantial increases in public transport use by passengers and airport staff. Illustrative layouts are shown for phased development to 2030. Expansion of the operational area as proposed in Table 8.2 is justified.
32. Policy MA1 designates Manchester Airport as a strategic site. It follows from Policies SP1 and EC1, and it is clear that developing the Airport is central to achievement of the Core Strategy. The Submission Proposals Map shows the Airport Strategic Site [CD8]. Table 8.2 within Policy MA1 shows how different parts of the site would be used and developed to meet the various operational requirements. The extent of these different sub-areas is shown in Figure 8.8. This approach is consistent with paragraphs 4.6 & 4.7 of PPS12 and is sound.
33. Concern has been raised that expansion at the airport could have a number of harmful environmental effects. The Airport’s Noise Action Plan prepared in line with the European Union’s Environmental Noise Directive was adopted in May 2011. The Airport works with airlines to minimise noise from aircraft and reports significant progress in reducing local noise and disturbance in recent years, despite the growth in air traffic. The noise effects from aircraft are clearly experienced beyond the boundaries of Manchester City Council’s area, within Districts whose residents would not have been consulted directly on this plan. Nevertheless, it is evident that the Noise Action Plan was widely advertised and consulted upon. Neighbouring local authorities have not objected to Policy MA1’s proposals for the Airport.
34. Road traffic and airport vehicles are responsible for emissions which are harmful to local air quality. Monitoring is carried out at the Airport as recorded in paragraph 8.96. Concerning sites of ecological importance, the plan aims to protect the Cotterill Clough SSSI and Sites of Biological Importance. Natural England expressed satisfaction with the approach subject to changes to the supporting text which were made by the Council prior to submission.
35. Policy MA1 seeks a change to the Green Belt boundary so that the areas needed for airport development are excluded from it. Policy RDF4 of the RS,

whilst stating that overall the general extent of the Green Belt in the North-West would be maintained, conceded that LDFs might provide for detailed changes to boundaries to accommodate the expansion of Manchester Airport. Changes should be made to meet operational infrastructure requirements, and Policy MA1 is in line with the RS approach. The need for the Airport to expand in order to meet the updated national forecasts and fulfil its potential as an economic driver in the region provides the exceptional circumstances for an alteration to Green Belt boundaries in accordance with paragraphs 2.6 & 2.7 of Planning Policy Guidance: Green Belts (PPG2). The plan shows clearly how the boundary would be changed.

36. Overall, I conclude that the plan’s proposals for Manchester Airport are up to date and justified, and are consistent with its vision and spatial objectives to improve economic performance consistent with halting climate change.

Issue 4 – Whether the policies and proposals for general housing, for affordable housing and housing for specialist groups including gypsies and travelling showpeople and students are sound.

37. Policy H1 of the plan aims to provide approximately 60,000 new dwellings 2009-2027 at an average of 3,333 dwellings per annum. This is below the annual average rate of 3,500 dwellings sought by Policy L4 (with Table 7.1) of the RS to 2021 and the limited period beyond. However, the plan is underpinned by the Greater Manchester Housing Market Assessment 2008 and Update 2010 [CD14.5] and the Manchester Housing Demand Study, November 2010 [CD14.14]. A review of household growth and housing figures for the various authorities across Greater Manchester in early 2011 [CD14.8] shows that the figure of 3,333 dwellings per annum would exceed the figure derived from the 2010 Greater Manchester Forecasting Model. It is in line with expectations for the sub-region. There is no evidence that Manchester is seeking to restrict the provision of new housing. Indeed, it sees a high level of housing provision as vital to support economic growth.
38. The Strategic Housing Land Availability Assessment updated in 2010 (SHLAA) [CD14.10] indicates that housing sites within the planning pipeline (under construction or with planning permission) in 2010 should provide over 20,000 new dwellings, and other identified sites would add some 32,000 dwellings. Thus there is no evidence of a shortage of land for housing in the City. The SHLAA estimated that Manchester had a deliverable housing land supply of some 21,000 dwellings which would amount to 6.05 years, exceeding the requirement of PPS3: Housing for a five year supply, and the aspiration of the Draft NPPF for a greater supply.
39. Whilst an allowance is made for some development on windfall sites, this is justified in the SHLAA with reference to past experience of the redevelopment of obsolete industrial premises and the conversion or redevelopment of older commercial and warehouse properties in or on the edge of the City Centre. Unless the landowner has made clear that they wish to sell or develop such sites, they are not included in the SHLAA. With the SHLAA in place and updated annually, the rate of windfalls is expected to fall but not to disappear completely. The local circumstances of central Manchester are unusual and sufficient, in my assessment, to support the allowance made for windfalls.
40. I consider that the targets for new housing provision in the plan are

sufficiently aligned with the RS to achieve ‘general conformity’, and are justified. The deliverability of housing was examined through a SHLAA and Strategic Sites viability assessment – Levvel [CD14.3]. The Council has put forward modifications to the housing trajectory in Policy H1 to add a key and enhance it which adds clarity and should assist implementation **(MM6)**.

41. Core Strategies should indicate how much development is intended to happen where and when (PPS12). Policy CC3 states that the City Centre will see the most intensive development of housing with 16,500 units provided over the plan period. Policy H2 identifies a strategic housing location covering parts of north, east and central Manchester. Policies H3-H7 describe the broad amounts and types of new housing which are planned. The Delivery Strategy tables accompanying each policy provide the quantitative figures, with indications of phasing. The Council proposed a modification to add a summary table to the Housing chapter which should be made for clarity and to achieve consistency with PPS12 **(MM6)**.
42. Policy H1 seeks residential densities of around 40 dwellings per hectare in the Inner Areas. The Council confirms on the basis of past experience that such densities would be compatible with providing family housing. Subject to the above changes, the plan is sound in respect of provision for general housing.
43. Policy H8 sets a target of 20% of new housing on sites of 0.3ha/ 15 dwellings or more to be affordable. The Council recognises that the use of market housing to subsidise affordable housing is only one mechanism for meeting the needs of those unable to buy or rent on the open market; other national or locally funded programmes will be necessary to provide sufficient housing. The 20% target is under-pinned by the Update Report of the Housing Market Assessment [CD14.5], Affordable Housing Assessment of Viability [CD14.2] and Access to Affordable Housing [CD14.1]. The plan makes clear that developers should use the 20% target and 5/15% proportion for social rented and intermediate housing as a starting point, and that either lower/different proportions or exemption from affordable housing provision will be considered where viability or other factors indicate that this would be appropriate. The policy is positive but sufficiently flexible to be effective. Subject to modification to refer to “social and affordable rent” in line with recent change to PPS3, the policy is sound **(MM7)**.
44. Changes were made to Policy H9 prior to the plan’s submission to add numbers for new pitches and reflect the study of Gypsy and Traveller Accommodation and Service Delivery Needs [CD14.6]. The policy includes reasonable criteria for site selection in line with Circular 1/2006. The text refers to the Site Allocations DPD which will include specific provision. Changes to Policy H10 were also made pre-submission to make the policy more reflective of housing for people with additional support needs.

Houses in Multiple Occupation (HMOs) and Student Housing

45. Policy H11 seeks to limit the change of use from dwellinghouses to HMOs in areas which already have a high concentration of shared student houses. It is clear that a large number of students attend University and/or live in Manchester and that there has been a considerable growth in students over the last two decades. The Assessment of the Need for Shared Housing in Manchester, 2011, [CD14.19] gives an estimate of 95,000 students in

Manchester and the Regional Centre.

46. Manchester Student Strategy [CD14.11] includes a substantive survey of students and assesses the issues surrounding a large student population in some parts of the City. Its key findings include that the negative effects of a large student population disproportionately affect some neighbourhoods. These effects mainly relate to the impact of students living in shared housing on existing communities. Noise and anti-social behaviour late at night, litter and poor waste disposal practice, poor maintenance of properties and some distortion of local shopping centres, with high growth in takeaways and bars, are among the problems associated with high concentrations of student housing.
47. It seems legitimate for the Council to seek to address these problems through planning. Though PPS3 may not aim for ‘balanced’ communities, its key housing policy goal is that everyone should have the opportunity of living in a decent home, which they can afford, in a community where they want to live. A mix of housing is considered desirable by PPS3, and this would count against neighbourhoods being dominated by students and/or others in short-term rented accommodation, especially if the latter were disrespectful of neighbours and the way of life or environment of established residents. In order to address such problems, the Council made an Article 4 Direction which came into force in October 2011, to control the change of use to HMOs. Policy H11 in the plan aims to indicate where and in what circumstances planning permission would be granted or withheld.
48. Parties representing landlords and students in Manchester questioned the adequacy of the plan’s consultation procedures, contending that rapid policy development at the end of the plan preparation process was not consistent with good and fair engagement. However, the legal requirements for the local plan were complied with, and consultation has exceeded the requirements of the Regulations. Changes to the Use Classes Order to introduce a new class for small HMOs (C4) were made during the plan preparation period, in April 2010. The requirement to obtain planning permission for a change from C3, dwellinghouse, to C4 was, however, removed by the Coalition Government in October 2010. This triggered the introduction of the Article 4 Direction by Manchester. I note that a legal challenge was made by landlords’ associations to the Article 4 Directions from some 19 authorities including Manchester in November 2011, but make no comment on this.
49. In view of changing Government policy as well as the rapid increase in student numbers over recent years, it is unsurprising that the policy in the emerging local plan has been subject to changes. Policy H11 of the submitted plan is broadly similar to Policy DM5 of the Pre-Publication Partial Consultation document on which comments were invited in August and September 2010 [CD3.1]. Those who sought to make representations on Policy H11 of the submitted plan but had missed the consultation period were allowed to present their case at an extension to the hearing sessions. I have taken account of the late evidence and the Council’s response to it. I am satisfied that interested parties have had adequate opportunity to give their views.
50. Section 149 of the Equality Act 2010 was described as particularly relevant to Policy H11 because it is overtly directed at having an impact on the social

composition of Manchester. The Council’s sustainability appraisal included an equality impact assessment, and I am satisfied that due regard has been had to the principles of equality of opportunity, fostering good relations between different age and social groups within Manchester, and eliminating discrimination in the preparation, development and examination of the plan.

51. Policy H11 is designed to provide more detail as to how the existing Article 4 Direction will be applied. It would not displace existing students and student accommodation, but would address the future growth in HMOs in selected areas of Manchester. The Council’s evidence that some 70% of households in the City are in wards which would be unaffected by the policy, having concentrations of HMOs below the 10% threshold set out in the policy, has not been substantively challenged. Manchester is a highly urban local authority with good accessibility to all parts by public transport, so that a wider distribution of HMOs than in the past would not amount to discrimination against students or other groups in the population.
52. Student numbers are not expected to rise as fast in the future as they have in recent years because of higher tuition fees and more restrictions on foreign students, according to the Assessment of the Need for Shared Housing in Manchester [CD14.19]. This view is shared by Manchester student bodies who indicated that the “massification” of the 1980s and 1990s is unlikely to be repeated in the near future.
53. HMOs are not simply occupied or sought after by students. The survey undertaken by authors of Manchester Student Strategy indicated that more than half of the student respondents were ‘likely’ or ‘very likely’ to stay in the North West after graduating. Their preferred areas to live were in and around the areas of student concentration. Data and mapping from Experian shows high concentrations of “educated, young single people living in areas of transient population”. If Policy H11 deterred some young graduates from staying in Manchester or made it difficult for them to find suitable housing, I accept that this could undermine the effectiveness of economic policy to foster growth with a more skilled workforce. On the other hand, however, if the spread of HMOs drove more mature, longstanding residents from the City, this too could be harmful for the local economy.
54. The demand for shared housing from those claiming Local Housing Allowance is expected to increase from 2012 onwards as claimants under 35 years of age will be unable to afford to rent alone. Because of high house prices, relatively few people in this age group will be able to buy their own homes. Social housing is not usually available to young single people. Hence, a high proportion of young working people will require shared housing for rent. Notwithstanding these trends, the Greater Manchester Forecasting Model 2011 estimates that the number of people aged 20-34 will fall from 2012 onwards [CD14.17]. The overall increase in demand for HMOs is considered unlikely to be significant. These considerations justify fine-tuning of the policy and not its abandonment, in my view.
55. Bedspaces in purpose-built student accommodation schemes with planning permission exceed the forecast growth in student numbers from the University of Manchester, Manchester Metropolitan University and Salford University. Rents in shared accommodation are considerably lower than those of private

halls. However, rents will reflect supply and demand, among other things, and the affordability of purpose-built accommodation may reduce relatively in future if there is an over-supply. Policy H12 supports new purpose-built student accommodation, confirming that the plan is not designed to/ nor likely to limit student numbers or discriminate against young people. The Council’s proposed modification to the supporting text clarifies this **(MMS)**.

56. Following the hearings in early December 2011, I wrote to the parties to explain that I had two principal concerns with Policy H11 as written:
 - It was too precise and inflexible for a core strategy, the policies of which should be sufficiently robust to last 15 years;
 - There was insufficient justification for the numbers given ie. a threshold of 10% of properties within 100metres of a site.

57. On the first point, this policy is a new initiative and its full consequences are unknown. Other local authorities are contemplating similar approaches (Portsmouth Core Strategy was mentioned at the hearings), but no evidence from the application of such a policy for a reasonable length of time elsewhere was presented. The policy proposes intervention in the housing market which is not inappropriate (affordable housing policy does this) but the markets are complicated, and changing as a result of demographic, economic and financial factors. Paragraph 9.51 of the plan concedes that application of Policy H11 may result in blight in areas of high concentration of HMOs. This would clearly be undesirable. It is insufficient, in my opinion, to state that the policy’s effects would be monitored and the policy revised if necessary. Policy H11, as written, is out of line with PPS12, paragraph 4.46, which expects a 15 year time horizon. It is unclear how Policy H11 would handle changing circumstances. It is too focussed on short-term development management.

58. On the second point, the numerical values used in the policy, the Manchester Student Strategy examined whether a ‘tipping point’ or loss of social cohesion was reached when the number of student households exceeded a given percentage. It observed that problems associated with students seemed most noticeable where encroachment occurred in relatively stable neighbourhoods. The edge of Fallowfield/Wilmslow Road ‘core’, in areas with 20-40% student households, was mentioned. Elsewhere, the Strategy commented that there is not always a correlation between areas of highest student concentration and ‘student issues’. Similar issues could also relate to young people (aged 20-34) who are house-sharing but are not students.

59. The Strategy stated *"if there is a 'tipping point' it is very likely to be different in different neighbourhoods, and will be dependent on the house type and make up of other residents in the neighbourhood"*. It commented on 10%, 20% and 50% thresholds but added *"this is only a broad guide and should not be used as basis for policy or initiatives."*

60. The above evidence confirms that the 20% threshold as referenced in paragraph 9.44 may not be applicable across the whole City. The 10% threshold, promoted through Policy H11, was preferred following consultation with stakeholders on Policy DM5 of the Pre-Publication Consultation plan. A number of those who were consulted argued in favour of 10% rather than 20% citing experience in Glasgow and elsewhere. However, no details of a

specific policy or any assessment of its effectiveness in promoting social harmony were given. There is little support in Manchester’s evidence for a 100 metre radius. The emerging Policy H11 was referenced by the Inspector determining an appeal (Ref APP/B4215/A/10/2139091) in Withington, Feb 2011. Although she dismissed the appeal for change of use to a 10 bedroom HMO and gave the emerging policy “some weight”, I consider that the policy requires amendment to make it sound and applicable for all decision-making.

61. Landlords argued that it could be difficult for prospective applicants to calculate whether or not the 10% threshold within the 100 metre radius zone had been exceeded. The Council retains much of the necessary land use and property information, and so pre-application discussions on planning applications could assist. The sources for such information could usefully be set out by the Council in a separate document. The Council has proposed modifications to Policy H11 and its supporting text to state that the numerical values will be re-considered and set out in the forthcoming Site Specific Allocations Development Plan Document. Even if a Supplementary Planning Document (SPD) was considered suitable in the case of Portsmouth, having regard for the specific circumstances of Manchester and PPS12, paragraph 6.1, I am satisfied that the policy should be taken forward and detailed in a DPD.
62. I conclude that the figures in the plan are not substantiated by credible evidence and are unsound. Modifications proposed by the Council to eliminate the numbers from Policy H11 and explain that the details will be set out in the future Site Specific Allocations DPD are needed to achieve a justified and deliverable policy (**MM8**). Then, I conclude that the policies and proposals for general housing, for affordable housing and housing for specialist groups including gypsies and travelling showpeople and students will be sound.

Issue 5 – Whether the plan is consistent with promoting an integrated transport policy and more sustainable transport choices for people and the movement of freight. Whether proposed improvements to infrastructure and services are justified and capable of delivery.

63. The three policies in the transport section of the plan, among other things, support a sustainable transport system encouraging modal shift away from the car; seek a pattern of development which gives good access to the City’s main economic drivers with good connectivity by walking, cycling and public transport; promote transport initiatives to extend Metrolink, improve heavy rail infrastructure and provide new bus services. The section refers to the Greater Manchester Third Local Transport Plan 2011/12-2015/16 [CD12.6] (LTP3) and to collaboration with the Highways Agency and Greater Manchester Passenger Transport Executive to identify and prioritise highway and public transport infrastructure provision to support planned new development.
64. The Council’s amendments at publication stage added references on the development and improvement of freight transport to Policy T1, which are necessary if the plan’s economic growth strategy is to be achieved. I support the later proposed modification to confirm that residents as well as businesses should benefit from the shift away from car travel (**MM9**).
65. Policy CC5 promotes measures for the City Centre in line with the Transport Strategy [CD12.5]. This policy is supportive of sustainable travel modes and

seeks to manage the transport system in the City Centre so as to improve pedestrian safety and air quality and secure an accessible public realm. The plans for closure of Victoria Street to traffic no longer exempt buses, and the Council’s modification would confirm this aiding effectiveness **(MM3)**. The plan’s transport policies are consistent with PPG13’s aim to integrate planning and transport and reduce the need to travel, especially by car.

66. Policy RT2 of the RS, Managing travel demand, refers to ‘smarter choices’ to reduce private car use. These include company, school and personal travel plans, safer routes to school, travel awareness, car pooling, car sharing, car clubs, park and ride, real time travel information and integrated ticketing and increased home working, all of which can contribute to changing travel behaviour. LTP3 also promotes ‘smarter choices’ advising that improvements to infrastructure for public transport, walking and cycling will not alone achieve the desired modal shift. Policy T2 of the plan refers to travel plans. Latest statistics suggest that rail patronage and cycling increased significantly between 2005 and 2010, Metrolink usage remained stable with trains often running at capacity, and car journeys into the Centre declined. Whilst more could have been included in the local plan on measures to achieve a behavioural change, there is evidence of a shift to more sustainable transport modes and the plan is not unsound.
67. Appendix B provides parking standards in line with those in the RS which are maxima for cars. Policy T2 and paragraph 11.16 allow alternative levels of parking where local circumstances warrant them, and advise that the standards do not apply to the City Centre where there is a complex variety of development. Some disappointment has been expressed that the approach could enable developments with unjustified high levels of car parking to succeed. However, the restrictive standards are retained in the Appendix whilst the plan reflects recent Government changes giving local authorities more flexibility over parking policy.
68. Policy T3 identifies a number of public transport infrastructure schemes. This seeks improvements to Metrolink which are programmed to occur over the next five years. The projects have the support of the Greater Manchester Integrated Transport Authority and sources of funding are identified. There is popular support for a new heavy rail station at Baguley to serve areas of deprivation in Wythenshawe. However, the planned extensions to Metrolink will improve Baguley’s connection to the City Centre and will be designed to allow a light/heavy rail interchange in the future. There is currently no business case for a new station at Baguley, and the Council advised that one would not be sought until the Northern Hub works have been completed.
69. The Northern Hub, with Metrolink extensions, are priorities for the Council and Greater Manchester. The Northern Hub is a heavy rail project to improve capacity on the network, increasing speeds, reducing journey times and aiming to benefit all the North of England. The Transport Strategy for Manchester City Centre describes the Northern Hub as vital to the economic success of the north, but expresses concern that funding arrangements remain uncertain. The plan could take 10 years to construct. The plan supports improvements to heavy rail infrastructure in general in Policy T3 and names the Northern Hub in its delivery strategy. Given the uncertainty surrounding delivery and timing, which depend on Network Rail, this approach is sound.

70. The strategic transport initiatives in Policy T3 do not include road schemes. However, Policy EC11 refers to the South East Manchester Multi-Modal Study (SEMMMS) scheme for an A6 to Manchester Airport relief road. Neither the RS nor the Government’s Comprehensive Review 2010 supported this SEMMMS road which, it was argued, could encourage unsustainable travel habits and harm air quality. Moreover, the SEMMMS study is now dated and based on assumptions of rising traffic growth which have not been realised. Whilst the infrastructure plan does not show such road improvements as a requirement for Airport City or the local plan, the Council expressed support for referring to the scheme. It is listed as a priority scheme of the Greater Manchester Transport Fund in LTP3 and might be feasible in the future. Manchester Airport Group advised that it would take account of the scheme in master planning and developer contributions might help with future funding.
71. I accept that, especially in view of the designated Enterprise Zone, a reference to the SEMMMS scheme in the plan would provide flexibility and could assist if new opportunities to bid for funding arose. New traffic modelling and environmental impact assessment would be needed to justify and progress the scheme, and these would address the identified concerns. The Delivery Strategy for Policy T3 also refers to M56 widening and improvements which would be funded by the Manchester Airport Group. This would be consistent with planning obligations linked to earlier planning permissions for T2 and the Second Runway, and additional wording should clarify this **(MM10)**.
72. The Highways Agency confirmed its satisfaction with the approach to resolving any problems for the strategic road network as outlined in paragraphs 11.8 and 11.9 of the plan. With the modifications proposed by the Council, I conclude that the plan is consistent with promoting an integrated transport policy and more sustainable transport choices for people and the movement of freight. The proposed improvements to infrastructure and services are justified and capable of delivery.

Issue 6 – Whether the plan is promoting a sustainable, good quality environment; in particular whether its policies to reduce carbon emissions and secure climate change adaptation are justified and consistent with PPS1 Supplement: Planning and Climate Change.

73. Policy EN1 which defines eleven character areas in Manchester reflects advice in PPS1 and By Design and should help secure good design in new development related to local character. Policies EN2 and EN3 on tall buildings and heritage features complement EN1 and emphasise the importance of place-making and high design standards. The proposed modification **(MM11)** is needed to clarify that the character areas are broadly rather than precisely defined. Also to secure effectiveness, paragraph 12.21 should be extended to explain the approach to re-use of listed buildings in Policy EN3 **(MM12)**.
74. PPS1 Supplement: Planning and Climate Change requires planning authorities to have an evidence-based understanding of the local feasibility and potential for renewable and low carbon technologies to supply new development in their area. Policies EN4 – EN8 are underpinned by the Association of Greater Manchester Authorities (AGMA) study, Decentralised and zero carbon energy planning [CD13.1]. The AGMA study, based on case studies across the area, identified ways to achieve low carbon development at lowest cost. It identified

areas within Greater Manchester with potential to deliver the greatest carbon reductions through low and zero carbon energy infrastructure.

75. Policy EN5 sets out the areas within Manchester City with the greatest potential to deliver carbon reductions and calls for a pro-active approach by the City Council working with relevant stakeholders. Policy EN7 supports low and zero carbon decentralised energy schemes, and EN8 expects all new development to be planned and designed so as to be adaptable to climate change. The approach is consistent with the PPS1 Supplement. Paragraph 12.28 should be amended, as proposed by the Council, so that it accurately reflects the targets for CO₂ reduction (**MM13**). Policy EN7 states that biofuels should be obtained from sustainable sources and processes, and any proposals for biomass/ biofuels facilities should undergo rigorous sustainability appraisal. Modification of paragraph 12.46 to refer to producing as well as transporting biofuels would make the policy more forceful and effective (**MM16**).
76. Policy EN4 of the local plan builds on Policy EM15 of the RS emphasising the importance of following the energy hierarchy when planning development. Policy EN6 expects developments above a given threshold to achieve carbon reductions slightly above national minimum building regulations. The policy reflects the thresholds in Policy EM18 of the RS. The feasibility of achieving low carbon housing development is demonstrated by the AGMA study and the recently completed West Gorton Energy Proposal Plan Study [CD13.18]. Modifications to Table 12.1 to make the policy less complicated and more useable, and to paragraph 12.34 to refer to the West Gorton Study, have been put forward by the Council and they would make it effective (**MM14&15**).
77. As Policy EN6 allows for viability to be taken into account in its application, it would not be too onerous or likely to deter the provision of housing including affordable housing. The Council’s viability toolkit used in housing viability assessments [CDs14.2,14.3] would be available. Subject to the proposed changes, Policies EN4-8 are justified and should be deliverable.
78. Policies EN9-EN12 provide protection for green infrastructure, open space, sport and recreation, seeking opportunities for new provision in appropriate areas. Paragraph 12.54 is supportive of enhancements to canal corridors, and it is unnecessary for details of the Bridgewater Way initiative to be given in the plan. The accessibility to open space standards set out in the table following paragraph 12.60 do not meet the standards set by Natural England. However, they are based on the Manchester Strategic Open Space, Sport and Recreation Study [CD13.10]. This approach is in line with PPG17 which promotes the use of locally derived standards, and is realistic for this intensively developed urban authority.
79. Policy EN13 confirming that the extent of the Green Belt will only be amended in the vicinity of Manchester Airport in accordance with Policy MA1, is consistent with national policy in PPG2. The Council advised that Policy EN14 would not need to be revised in the light of the High Court judgment of October 2011 granting Peel Holdings permission to judicially review the Environment Agency’s decision regarding the classification of sluice gates on Manchester Ship Canal as flood defences. None of the areas benefiting from the sluice gates are within Manchester’s boundary.
80. Concern was expressed that Sites of Biological Importance (SBI) and Local

Nature Reserves have been steadily deteriorating in the Mersey Valley over a number of years as a result of poor management, neglect and recreational pressure. In the future, they will be at risk from proposed extensions to Metrolink. This raises questions about the likely effectiveness of Policy EN15. The policy reflects PPS9 and the Good Practice Guide for biodiversity and geological conservation in that it provides a positive approach to maintain and enhance the City’s varied assets. It requires developers to avoid, mitigate or compensate for harm. Natural England welcomed the policy’s aims, and details of management techniques are not a matter for the current plan. However, the Council proposed a modification to acknowledge that tensions between improving biodiversity and recreational access should be addressed **(MM17)**. I support the proposed change to assist effectiveness.

81. The Council advises that SBIs, being local sites, are reviewed every five years by the Greater Manchester Ecological Unit, in line with DEFRA’s guidelines. I have seen no substantive evidence that non-statutory local sites would be given too much protection or that the policy would hold back good quality development projects.
82. On waste and minerals, Policies EN19 and EN20 commit the City to joint working through DPDs for the Greater Manchester area. The Council has consulted Urban Vision, who prepared the Joint Waste DPD, to secure appropriate wording for Policy EN19. However, the plan should be updated as the Joint Waste DPD has now been found sound and adoption is expected in Spring 2012. A Joint Minerals DPD has also been submitted for examination and the Core Strategy should be modified to acknowledge this **(MM18-22)**.
83. As long as the above-mentioned modifications are made, I conclude that the plan should promote a sustainable, good quality environment. Its policies to reduce carbon emissions and secure climate change adaptation are justified, consistent with the PPS1 Supplement: Planning and Climate Change, and are deliverable.

Issue 7 – Whether the plan is likely to be effective ie. deliverable, flexible and able to be monitored.

84. The strategy for Manchester is to promote economic growth and regeneration within a sustainable context of mitigation and adaptation to climate change. It is not a plan for passivity and widespread preservation. A ‘Delivery strategy’ is included at the end of each policy or group of policies, indicating a positive approach. More detail and underlying evidence is contained in the Infrastructure Delivery Plan [CD6]. This identifies the key infrastructure providers for physical, social & community, and green infrastructure, and describes a programme of liaison with them. CD6 contains a schedule showing the type, timing and cost of infrastructure needed to support the growth in the Core Strategy. It indicates levels of priority as committed, planned and long term/aspirational. The approach is consistent with PPS12, paragraphs 4.8-4.10.
85. Manchester lies at the heart of Greater Manchester. Both the evidence base and exchanges at the Examination Hearings indicated that mechanisms for joint working and collaboration are already in place and are functioning well between public sector bodies, and with major private sector partners eg. the Manchester Airport Group.

86. CD6 states that it is a ‘living document’ and has been amended through the iterative preparation process. It will be monitored and reviewed to take account of changed circumstances and new policy guidance. The plan’s delivery boxes contain clear information on indicators and targets which will assist with monitoring.
87. The Council is in favour of setting a Community Infrastructure Levy (CIL) and work is likely to begin in 2012. AGMA is looking at the potential for a co-ordinated approach to CIL development. Policy PA1 flags up the possibility of using CIL in future to fund appropriate infrastructure.
88. Paragraph 4.46 of PPS12 expects plans to be flexible and able to adapt to changing circumstances. The plan aims to focus growth on the Regional Centre and inner areas over the next 15 years and the Council points out that this would be appropriate in the context of high, medium or low growth. The use of criteria-based policies, and policies which allow site-by-site conditions to be considered, also give flexibility. For example, on affordable housing and low carbon developments, an individual scheme’s viability is to be taken into account. It is recognised that viability will vary over the lifetime of the plan.
89. Modifications have been put forward to Policy PA1 and its supporting text to achieve consistency with national policy wording on planning obligations **(MM24-27)**. Subject to these modifications, I conclude that the plan is likely to be effective ie. deliverable, flexible and able to be monitored.

Legal Requirements

90. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS (update May 2011) which sets out an expected adoption date of March 2012. The Core Strategy’s content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in January 2007 and consultation has been compliant with the requirements therein. Appropriate consultation on the post-submission changes has also been carried out.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report [CD13.4] is dated November 2009. There are no European designations within Manchester City Council area, but the Rochdale Canal SAC adjoins its boundary. Providing mitigating plans, policies and strategies are adopted & implemented appropriately through the development management process,

	development within the identified areas could proceed without harm to the Canal’s special interest. It is not justifiable to restrict development <i>per se</i> .
National Policy	The Core Strategy complies with national policy except where indicated and changes are recommended. It is consistent with the thrust of the Draft NPPF, July 2011.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

- 91. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above**
- 92. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Manchester Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12.**

Jill Kingaby

Inspector

This report is accompanied by:

Appendix (separate document) – Main modifications requested by the Council that are necessary for soundness