

Question No 19 - Employment Provision

Do you agree with this policy? Yes (5) In Part (8) No (0)

Yes (LP385-16, LP321-19, LP320-4, LP309-19, LP305-10)

In part (LP404-8, LP292-9, LP272-6, LP267-11, LP266-5, LP28-19, LP9-6)

	Respondents comments	MCC Response	Respondent ID
1	Support.	Support noted.	LP266-5, LP272-6, LP284-14, LP305-10, LP309-19, LP320-4
	Employment		
2	Support the focus of employment in existing employment areas. The policy should also encourage employment in small neighbourhoods as this can support more sustainable neighbourhoods. Local workplaces need to be those with minimum or zero local environmental impact.	No change proposed to the plan. The local plan does not exclude employment in small neighbourhoods subject to amenity issues and encourages employment within district centres. The local plan provides sufficient flexibility that takes account of the issue raised.	LP261-25, LP267-11, LP292-9
3	Whilst the policy focuses on the making provision for 1.4 million sqm of office space, the policy should offer the flexibility to accommodate a range of employment types across sites and acknowledge the role of the airport in driving logistics demand in the south of the City. It should identify sites for a range of employment uses including (B2) industrial and (B8) warehousing, such as at Atlas Business Park.	Change agreed. Identify key employment locations on the policies map. In terms of the employment type by site the policy wording provides sufficient flexibility that takes account of the issue raised.	LP289-8

	Respondents comments	MCC Response	Respondent ID
4	The distinction between Employment Growth Locations and Economic Growth areas is unclear and the preamble to the policy could make the distinct role of each clearer. It is also suggested that there should be a distinction between manufacturing space and logistics operations in terms of function and space requirements. At present these seem to be referred to interchangeably as in paragraph 9.8.	Change agreed. Amend wording in policy and supporting text to refer to “ key employment locations ”. Existing employment sites and premises offer different specifications and spaces. The policy provides sufficient guidance to consider the suitability of a site for manufacturing space or logistics on a case by case basis in any development proposals. To provide greater clarity amend third paragraph within section titled “Employment Provision” to refer to existing employment areas. “Regular investment in existing sites shows continued commitment, such as Ardwick Goods Yard, Central Park South and Sharston Industrial Estate to these sites. ”	LP284-14
5	Clarify why the PfE Table 6.1 indicates an office supply in Manchester of over 2 million sqm of office space and the draft Local Plan makes provision for at least 1.4 million sqm.	No change proposed to the plan. The 1.4million sqm of office space in the Local Plan relates to Manchester’s share of the PfE requirement for office space identified in PfE JP-J3: Office Development of 2,019,000sqm. It does not relate to the supply which is over 2 million sqm of office space.	LP272-6
6	Suggest that the policy should provide sufficient flexibility and adaptable employment space to reflect the evolving nature of work. One option could be to add a clause to the policy text as follows: "Development proposals for employment space should demonstrate sufficient flexibility to accommodate evolving market needs and technological advancements, particularly within	No change proposed to the plan. The policy refers to a provision of a variety of employment space. The market is good at accommodating evolving market needs. The policy wording provides sufficient flexibility that takes account of the issue raised.	LP272-6

	Respondents comments	MCC Response	Respondent ID
	strategic regeneration areas, to ensure long-term viability and deliverability."		
7	Make stronger reference to employment related to green energy transitioning, ie green energy, retrofitting homes. Encourage investment in green skills and jobs.	No change proposed to the plan. The PfE policy JP-J1: Supporting Long Term Economic Growth takes account of the issue raised and should be read alongside the Local Plan.	LP325-7, LP404-8
8	Support refurbishment of existing offices.	No change proposed to the plan. Comments noted.	LP404-8
	Transport		
9	National Highways states the impact of the 1.4m sqm of office floorspace may have cumulative SRN impacts. Plans should identify impacts per Circular 01/2022 and Planning for the Future, scoping mitigations/interventions where required.	No change proposed to the plan. Further work is underway outside of the Local Plan process to inform the approach to assessing impact on the SRN.	LP321-19
	Environment		
10	Cross reference to policies on Urban Green Factor and biodiversity.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP28-19
	Policies Map		
11	Request that the full extent of the areas of Roundthorn and Sharston are annotated on the Local Plan Policies Map.	Change agreed. Amend the Policies Map to show economic development areas.	LP301-2
	Christie Hospital		
12	Clarify what the Christie Hospital means - does this include expansion? Also, seek clarification of how the 1.4million sqm of accessible office space relates to Christie Hospital.	Change Agreed. Delete reference to: "Christie Hospital" .	LP297-3

	Respondents comments	MCC Response	Respondent ID
	Medipark		
13	Expresses concern that no ecological survey accompanied the Medipark allocation during the PfE process. Bird surveys will be required as part of any proposal. Any BNG should be linked to LNRS requirements.	No change proposed to the plan. Any ecological requirements will be picked up as part of any future proposal.	LP291-19
	MIX Manchester		
14	The draft policy should reflect the latest masterplan and SRF and change the name from 'The Mix – Airport City North' to ' MIX Manchester '.	Change agreed. Amend wording in policy from “The Mix – Airport City North” to “Mix Manchester”	LP266-5
	Manchester Airport		
15	Disagree that growth of the airport should be considered a catalyst for economic development. It runs counter to the aspiration to meet zero carbon.	No change proposed to the plan. The growth of aviation is covered by national policy and is not a matter for the Local Plan. National aviation policy seeks to make the best use of existing runway capacity and ensure aviation supports the national objective of long-term economic growth. Aviation emissions are recognised as contributing toward climate change and the Government strategy is to tackle this at an international level, through emissions trading systems.	LP28-19, LP404-8
	Disabled Access		
16	Ensure that all employment opportunities are accessible for disabled people.	No change proposed to the plan. Accessibility is covered by Policy DM1 which states that buildings and neighbourhoods must be fully accessible to disabled people, any further amendments are made to this policy.	LP385-16
	Indoor and Outdoor Sports		

	Respondents comments	MCC Response	Respondent ID
17	Include reference to Sport England's Active Design guidance. Policy wording is not considered to be strong enough to 'protect' loss of existing playing fields facilities. Policy wording should meet the requirements of NPPF para 104.	No change proposed to the plan. With regard to protection of open space this is set out in Policy SI1. With regard to playing fields the NPPF provides significant policy direction. The Local Plan picks up the approach to playing fields in Policies EN1 and SI1.	LP9-6

Question No 20- Economic Development Areas

Do you agree with this policy? Yes (2) In Part (3) No (0)

Yes (LP321-20, LP320-5)

In part (LP267-12, LP28-20, LP9-28)

	Respondents comments	MCC Response	Respondent ID
1	Support.	Support noted.	LP284-15, LP289-9, LP309-20
	Employment		
2	Draft Policy EC2 should be amended to support the type of developments likely to come forward across the Christie Hospital Campus and reference should be made to Use Class C2 (Residential Institutions), such as hospital wards, patient accommodation, and specialised clinical units.	Change agreed. Remove reference to the Christie Hospital as this is a largely C2 Residential Institution Use. Delete " Christie Hospital "	LP320-5
3	The Christie Hospital should not be listed under this policy relating to Class E, B2 and B8 because it is a C2 Residential Institution Use.	Change agreed. Remove reference to the Christie Hospital as this is a largely C2 Residential Institution Use. See point 2 above.	LP297-4
4	Regard should be had to the location of The Christie Hospital within a residential area.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP297-4
5	The distinction between Employment Growth Locations and Economic Growth areas is unclear	No change proposed to the plan. Amendments to Policy EC1 clarify the locations listed are key	LP284-15

	Respondents comments	MCC Response	Respondent ID
	and the preamble to the policy could make the distinct role of each clearer. It is also suggested that there should be a distinction between manufacturing space and logistics operations in terms of function and space requirements. At present these seem to be referred to interchangeably as in paragraph 9.8.	employment locations. The policy provides sufficient guidance along with other policies in the local plan to consider the suitability of sites for different employment space in terms of function and space requirements.	
6	Welcomes flexibility in the policy to enable Classes E, B2, B8 or sui-generis employment use.	Support noted.	LP289-9
7	Lidl state all Class E uses, specifically retail, should be explicitly supported within Strategic Employment Areas in addition to the use Classes E (offices, research and development and light industrial), B2 and B8 uses.	No change proposed to the plan. The changes proposed would not conform with national policy and guidance.	LP282-10
8	Support the focus of employment in existing employment areas. The policy should also encourage employment in small neighbourhoods as this can support more sustainable neighbourhoods. Local workplaces need to be those with minimum or zero local environmental impact.	No change proposed to the plan. The local plan does not exclude employment in small neighbourhoods subject to amenity issues and encourages employment within district centres. The local plan provides sufficient flexibility that takes account of the issue raised.	LP267-12
9	Disagree that growth of the airport should be considered a catalyst for economic development. It runs counter to the aspiration to meet zero carbon.	No change proposed to the plan. The growth of aviation is covered by national policy and is not a matter for the Local Plan. National aviation policy seeks to make the best use of existing runway capacity and ensure aviation supports the national objective of long-term economic growth. Aviation emissions are recognised as contributing toward climate change and the Government strategy is to	LP28-20

	Respondents comments	MCC Response	Respondent ID
		tackle this at an international level, through emissions trading systems.	
	Environment		
10	Add an additional bullet point requiring a strategy for foul and surface water management and clean water supply. Proposals must be designed to minimise the impact on water resources and wastewater infrastructure. Recommend additional supporting text related to the new bullet point with reference to new data storage facilities being required to engage with United Utilities.	No change proposed to the plan. The approach to water is set out within PfE JP-S2: Carbon and Energy, JP-S4: Flood Risk and Water Environment and within draft Local Plan Environment Chapter policies. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP386-16
11	Expansion of Atlas Park eastwards should include provisions for BNG gains.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP291-20
12	Cross reference to policies on Urban Green Factor and biodiversity.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP28-20
	Transport		
13	National Highways recommends early liaison to understand cumulative impacts and required highway mitigations of proposals close to SRN.	No change proposed to the plan. Comments noted.	LP321-20

	Respondents comments	MCC Response	Respondent ID
14	Recognise the contribution of Trans Pennine Trail/National Cycle Network to active travel access to Economic Development Areas.	No change proposed to the plan. The Bee Network incorporates the Trans Pennine Trail and National Cycle Network and other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP365-8
	Policies Map		
15	Show boundaries of Roundthorn and Sharston Industrial Estate.	Change agreed. Amend the policies map to show Economic Development Areas	LP301-3
	Indoor and Outdoor Sports		
16	Sport England strongly recommend the inclusion of reference (with the possible inclusion of the website link as a footnote) to the principles of our Active Design guidance. Policy wording is not considered to be strong enough to 'protect' loss of existing playing fields facilities. Policy wording should meet the requirements of NPPF para 104.	No change proposed to the plan. Policy SI2 references Sport England technical Design Guidance. Sport England's Active Design guidance covers a range of principles of wider relevance than the provision of new open space, sport and recreational facilities. Many of these principles are already picked up under other policies such as EN1 and T1. With regard to protection of open space this is set out in Policy SI1. With regard to playing fields the NPPF provides significant policy direction. The Local Plan picks up the approach to playing fields in Policies EN1 and SI1.	LP9-28

	Respondents comments	MCC Response	Respondent ID

Question No 21 - Existing Employment Space

Do you agree with this policy? Yes (6) In Part (3) No (0)

Yes (LP321-21, LP309-21, LP292-10, LP289-10, LP267-13, LP28-21)

In part (LP272-7, LP23-14, LP9-18)

	Respondents comments	MCC Response	Respondent ID
1	Support.	Support noted.	LP23-14, LP261-26, LP276-9, LP289-10, LP309-21, LP321-21, LP382-8
	Employment		
2	Reference should be made to retention, modernisation and intensification of existing businesses. Heineken Brewery should be identified as a strategic economic asset. Amend policy wording to state, recognising the value to employment, economic competitiveness and future industrial innovation of industrial employment sites such as the Heineken Brewery. It should also apply	Change agreed. Make reference to “intensification” of existing businesses in first line of policy. “Proposals for the upgrading, intensification, refurbishment ... “ The word “upgrading” in the policy covers modernisation. Reference has been made to	LP382-8

	Respondents comments	MCC Response	Respondent ID
	agent of change principles to developments impacting existing employment uses.	Heineken in reasoned justification to policy GL3 and therefore is not repeated here. Policy DM1 includes additional wording to take account of agent of change.	
3	Include a sub-heading to recognise and support the importance of the education sector at school, college and further education levels. The Local Plan should support facilities which form part of the critical infrastructure of the city and will need to evolve and expand.	No change proposed to the plan. PfE Policy JP-P5: Education, Skills and Knowledge promotes enhancement in education and skills including further and higher education. Where other policies in the development plan deal with these matters they are not repeated as the plan should be read as a whole.	LP310-5
4	Lidl is of the view that all Class E uses should be explicitly supported within existing employment spaces, alongside the existing E use classes supported, B2 and B8 uses.	No change proposed to the plan. The changes proposed would not conform with national policy and guidance.	LP282-11
5	Regarding point (a), further information should be provided in respect of what would be considered an ‘ancillary service’, such as hotels and retail. Regarding point (b), further information should be provided on what evidence must be provided to demonstrate that the existing uses or sites are no longer viable. For example, evidence of a marketing report, length of time a site is required to be marketed and the scope of marketing. The policy wording should be updated to make it clear which criteria must be met to justify alternative uses.	No change proposed to the plan. The policy provides sufficient guidance to consider issues on a case by case basis in any development proposals.	LP23-14, LP276-9

	Respondents comments	MCC Response	Respondent ID
6	Policy should incorporate sufficient flexibility to allow for the strategic redevelopment of underutilised employment land within designated strategic regeneration areas, such as Mayfield. The proposed exception clause ensures that the Local Plan supports the delivery of ambitious regeneration schemes. Amend policy wording to "Proposals will be supported, unless located within a designated strategic regeneration area where a comprehensive masterplan supports a mixed-use approach that delivers broader strategic objectives. "	Change agreed. Amend policy bullet point d to refer to strategic regeneration priorities: "the alternative use is in accordance with, and offers greater benefits to, the Local Plan vision, and objectives and strategic regeneration priorities and does not undermine the Plan's overall Spatial Strategy"	LP272-7
	Transport		LP321-21
7	Support the re-use of existing employment sites, where alternative uses are proposed this should involve appropriate scoping with National Highways.	Comments noted.	
	Indoor and Outdoor Sports		
8	Sport England strongly recommend the inclusion of reference (with the possible inclusion of the website link as a footnote) to the principles of our Active Design guidance. Policy wording is not considered to be strong enough to 'protect' loss of existing playing fields facilities. Policy wording should meet the requirements of NPPF para 104.	No change proposed to the plan. Policy SI2 references Sport England technical Design Guidance. Sport England's Active Design guidance covers a range of principles of wider relevance than the provision of new open space, sport and recreational facilities. Many of these principles are already picked up under other policies such as EN1 and T1.	LP9-18

