

Question No 22 - Housing Provision**Do you agree with this policy? Yes (6) In Part (10) No (1)****Yes (LP376-2, LP321-22, LP309-22, LP299-2, LP16-12, LP9-16)****In part (LP395-9, LP385-17, LP381-1, LP292-11, LP280-5, LP272-8, LP267-14, LP28-22, LP14-1, LP13-2)****No (LP274-2)**

	Respondents comments	MCC Response	Respondent ID
	Support		
1	General Support	General support noted	LPs 309-22, 299-2, 282-12, 278-16, 272-8, 367-2, 16-2, 303-1, 321-22, 9-16
2	Support for the housing figure	Support noted	LPs 278-16, 282-12, 269-7, 14-1, 303-1
3	Support the spatial distribution	Support noted	LP278-16, 267-14, 376-2, 303-1, 292-11, 267-14
4	Support for commitment to diverse housing mix and the prioritisation of larger family homes in the Inner Areas	Support noted	LP278-16
5	Support the link to SGL1	Support noted	LP278-16
6	Support the vision for Ardwick Green to deliver residential growth	Support noted	LP285-8
7	Support the 80% brownfield target in the Housing Strategy, as it is essential that brownfield sites are optimised to meet housing need	Support noted	LP16-2

	Respondents comments	MCC Response	Respondent ID
8	Support for building more 4 bedroom houses Moss Side	Support noted	LP393-4
9	Support for developing the Ryebank Road site for housing, as more houses are needed and this site is in a sustainable location which would bring economic, social and environmental benefits. The site should not be allocated under any environmental or recreational designations, nor designated as a green space	Support noted. No change proposed to the plan – this site is not referred to in the plan, but is identified in the SHLAA as a potential housing site.	LP517-1, 376-2, 303-1
	Housing figure		
10	Although the housing targets are mandated by central government and PfE the targets are in excess of real housing need and will lead to speculative purchase and empty units.	No change proposed to the plan – the housing target is as set out in PfE.	LP267-14, 292-11
11	The evidence base will need to document the rationale for the uplift from the current LHN, in line with paragraph 69 of the NPPF, especially as PfE was adopted prior to the introduction of the new Standard Method in Dec 2024	No change proposed to the plan – the housing target is as set out in PfE.	LP269-7
12	The plan needs more than the minimum requirement to ensure that sufficient flexibility is provided in the event that sites do not deliver as envisioned. A contingency of at least 20% is required	No change proposed to the plan. The SHLAA 2025 has significantly more supply than the housing requirement, allowing for flexibility.	LP387-3
13	A massive building programme is not actually required to create the number of homes needed, building at the scale proposed in PfE would add at least 10% to the locally set carbon budget	No change proposed to the plan. PfE has set out the housing requirement to 2039.	LP292-11
	Spatial distribution		
14	4,000 homes (7%) in Southern Areas may not meet local demand for family housing and affordable	No change proposed to the plan. The rationale for the spatial distribution is set out in Policy GL1 and its supporting text.	LP278-16

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	homes. Housing provision there should be increased to balance growth and meet local needs.		
15	Demand will only shift from places like Chorlton to north Manchester if lively and thriving communities accompany the homes	No change proposed to the plan. Policies elsewhere in the plan relate to North Manchester.	LP267-14
16	Challenge the setting of area targets according to availability of landowner and developer aspirations - a plot of open space has been excluded from the OSA because of ownership, accessibility, or developer intent, rather than strategic aims such as to rebalance the housing offer into North Manchester. This risks fettering and pre-empting the Planning Committee by steering them heavily towards a certain outcome, where alternative uses of the same plot are not considered.	No change proposed to the plan. The rationale for the spatial distribution is set out in Policy GL1 and its supporting text.	LP395-9
17	Distribution of homes based on SHLAA 2023 - evidence base should be updated as regularly as possible to ensure accurate targets	The SHLAA is updated annually. The next version of the plan will be checked against the latest SHLAA but the split between the areas does not change significantly from year to year.	LP16-2
18	The delivery of 65% of new housing in the City Centre and the focus on 2-bed apartments risk over-concentration of high-density apartments, often unsuitable for families	No change proposed to the plan. The rationale for the spatial distribution is set out in Policy GL1 and its supporting text.	LP278-16
19	Further land should be identified which can viably deliver the required affordable housing. By focusing so much development in the city centre without additional complementary development in the other areas including the south of the city, the overall needs as set out in the HNA (3 bedroom+ housing, specialist housing for sheltered/retirement, Extra Care, co-housing and	No change proposed to the plan. The rationale for the spatial distribution is set out in Policy GL1 and its supporting text.	LP387-3

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	residential care housing, M4(2) and M4(3) housing) will not be met. Evidence indicates that the existing supply, and continued reliance upon brownfield sites in the city centre / urban area to deliver predominately apartment schemes, will continue to deliver very low levels of affordable housing, and may not deliver at all.		
20	New housing should be in areas other than Moss Side and Rusholme as these areas have the highest housing density in GM	No change proposed to the plan The rationale for the spatial distribution is set out in Policy GL1 and its supporting text.	LP378-2
	Housing mix		
21	Emphasis on 2 bedroom flats is likely to lead to an oversupply of small flats and an undersupply of family homes	No change proposed to the plan. The figures in Table 10.2 are taken from Manchester's HNA and larger dwellings are supported as well.	LP267-14, 292-11
22	Lack of clarity regarding the proportions of housing types to be provided, for example the policy states that a "large" proportion of city centre homes are expected to be two-bedroom units, based on the HNA. This reflects market expectations rather than actual local need	No change proposed to the plan. Whilst not policy, the range of home sizes needed across the city based on the HNA are set out in Table 10.2 (market) and new additional table (affordable). Policy H1 supports larger homes in the city centre.	LPs 308-22, 379-12, 296-8
23	Request that any policies which set rigid targets for housing mix (e.g. specific percentages of 1, 2, 3+ bed units) offer an appropriate degree of flexibility in recognition of the challenges faced in delivering long term regeneration projects, as it is noted that the proposed unit mix for the city centre is significantly different to that which has been in operation for many years.	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy. Proposed amendment to sentence under 'Southern Areas' in Policy H1 'In line with PfE Policy H4 housing is expected to be of a lower density in the Southern Areas with a significant proportion with over 50% of homes expected to have 3 or more bedrooms.	LP272-8

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24	The distribution of homes being so heavily skewed to the city centre and the Core Growth Area means there is a risk that the supply does not marry up with the types of homes which Manchester needs over the plan period and that the Local Plan does not deliver the variety of homes over the variety of locations that is required. The Council must ensure that supply meets needs, especially as Table 10.2 indicates the need for a diverse range of house sizes.	Comments noted. Although the majority of units will be delivered within the city centre, in line with the focus on previously developed land in sustainable locations, the plan identifies significant numbers of residential units outside this area.	LP269-7
25	Housing mix in Table 10.2 for the City Centre is unrealistic and undeliverable - reduction in one-bed provision from its current levels (33%) would affect viability, and preferences of and affordability for purchasers. 3+ bed units in the city centre sell much more slowly than smaller units. A change to policy H1 (where it currently states that a large proportion of homes are expected to be 2 bed units and that larger homes in particular will be supported), requested in LP283-1 to support the delivery of 1-bed homes for up to one third of high density schemes.	No change proposed to the plan. Although H1 refers specifically to supporting larger homes in the city centre it does not preclude the development of smaller dwellings.	LPs 16-2, 283-1
26	The proposed thresholds of 35-50% family housing outside the city centre are likely to be very challenging for viability	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy.	LP16-2
27	The provision of 4 bed homes across the board feels ambitious, especially in the City Centre and Inner Areas	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy.	LP16-2

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28	Suggest having the equivalent data in Table 10.2 for the unit mix requirements for affordable tenures as well	PROPOSED CHANGE: Additional table added to show housing size needs for affordable housing	LP16-2
29	Targets for housing mix will be extremely challenging for large-scale, long-term regeneration projects. Market demand evolves, and a fixed mix may not align with future needs or viability. Policy H1 should adopt a flexible approach to housing mix, setting broad ranges rather than prescriptive targets. It should explicitly acknowledge that for strategic regeneration sites, the mix will need to respond to market signals, viability, infrastructure capacity, ensuring a balance between efficient land use and the creation of high-quality, liveable places.	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy.	LP280-5
30	City Centre housing developments are largely wholly delivered on brownfield land, which will have abnormal costs (remediation, infrastructure) that impact the viability. A more flexible approach for the home size mix for City Centre developments should be considered, recognising the unique characteristics and market dynamics of these areas. As worded this policy is not deliverable.	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy. Although H1 refers specifically to supporting larger homes in the city centre it does not preclude the development of smaller dwellings.	LP280-5
31	The requirement that over 50% of homes in the Southern Areas are expected to have 3 or more bedrooms is not justified, and not necessarily consistent with the requirement to build at a higher density in sustainable locations, or when there are constraints arising from changes of use. The policy refers to this being in line with PfE Policy H4, but that	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy. Proposed amendment to sentence under 'Southern Areas' in Policy H1 'In line with PfE Policy H4 housing is expected to be of a lower density in the Southern Areas with	LP264-3

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	policy is concerned with housing density and does not require over 50% of homes to be 3 bed or more.	a significant proportion with over 50% of homes expected to have 3 or more bedrooms.	
32	Policy should be amended to have a more flexible approach to housing mix, as two-bedroom or larger homes are difficult to let in apartment schemes for social rent for older people, due to under occupancy charges and the prevalence of single person households. Flexibility in the housing mix is essential to ensure viability of older person's housing development to meet needs	Rigid requirements for housing mix are not set out in the plan policy, table 10.2 shows the need across different parts of the city as shown by the HNA but is not policy.	LP13-2
	Site specific issues		
33	Residents in Miles Platting face significant housing pressures, including the recent loss of over 500 social homes, and their needs should be explicitly considered.	No change proposed to the plan. The Housing Growth Sites specifically identified in Policy H1 are areas where significant numbers of homes will be delivered. This does not mean that housing will not be delivered elsewhere, to meet the needs of residents.	LPs 308-22, 379-12, 296-8
34	Clayton Canalside might have potentially important habitat for invertebrates, so suitable surveys need to be undertaken to assess invertebrate interest.	No change proposed to the plan. Relevant surveys would be carried out at planning application stage, in line with government requirements.	LP291-21
35	The LNRS indicates opportunity areas to the west of the Clayton Canalside site and development could help to deliver appropriate measures to enhance the LNRS along this part of the corridor	Comments noted, no change proposed to the plan.	LP291-21
36	Strong opposition to development on parts of the Lower Medlock, the policies map shows development on areas of mature woodland, rich wildflower meadows, and the Medlock Valley Sculpture Trail and landscaped	No change proposed to the plan. The boundary of the Lower Medlock site in the SHLAA is a broad boundary and does not mean that all of the land within it will be built on, similarly the 'house'	LP274-2

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	Secret Garden - both created by local residents. Also includes badger setts, these being protected under planning laws. Whilst part of the area is protected as a 'River Valley' this seems poorly thought out in relation to the current land use and not large enough. e.g. derelict play area which would be suitable for redevelopment is protected under this designation, whereas richer woodland further upstream is not, nor are the most utilised and appreciated parts of the valley.	symbol shown on the policies map is indicative rather than being the precise development location. Existing habitat and usage will be taken into account in future development plans for this area.	
37	Question development of the Lower Medlock when this area supports trees, woodland and grassland habitat. This area would serve a better function as part of adjacent LNRS network - difficult to reason why this area has been left out of the River Medlock LNRS network as it provides the same function. Significant habitats within the site should be retained and enhanced for their biodiversity interest and green infrastructure roles.	No change proposed to the plan. The boundary of the Lower Medlock site in the SHLAA is a broad boundary and does not mean that all of the land within it will be built on. Any redevelopment of the site would need to consider biodiversity and green infrastructure.	LP291-21, LP274-2
38	Oppose development on the Palmerston Street site (Anco2416) for 64 homes due to its historical significance (former Roundhouse/University Settlement site), village green characteristics and negative impact on flood risk	Development of sites in the SHLAA would consider these factors at the point that plans are drawn up. NB the Round House site is on the western side of Ancoats Grove North and not within the SHLAA site.	LP274-2
39	No policy or proposal should enable significant or intensified residential use adjacent to or within operational range of the Heineken Brewery, unless full evidence-based mitigation and post-occupancy management responsibility rests with the applicant. No net loss, operational compromise or abatement	No change proposed to the plan. Policy DM1 has been amended to take account of agent of change.	LP382-9

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	measures should be imposed on the Brewery to facilitate adjacent new residential development.		
40	Support the application to designate sites in the Lower Medlock Valley as Local Green Space	Comments noted. A separate assessment has been undertaken for all requests for Local Green Space.	LP395-9
41	The Aquarius Estate should have the housing mix for the Inner Areas applied to it (Table 10.2), to reflect the needs of the existing community.	Change agreed. Amend Table 10.2 so that the North and Central column is headed “ North and Central Areas (Inner Areas) (including part of Core Growth Area) (%)”	LP383-8
42	Delivery of 2,500 homes in Ardwick Green should be supported from the outset rather than being delayed until 2036, given that residential development is already taking shape in this area.	Comments noted. The timescale is indicative and the Council would support earlier development proposals here.	LP285-8
43	NOMA can contribute at least 750 homes to the 40,000 expected to be delivered in the City Centre by 2040	Comments noted	LP280-5
	Density		
44	Space and quality standards for high density housing should be embedded to avoid micro-apartments	No change proposed to the plan – dwellings must comply with the NDSS, as set out in PfE policy JP-H3 and referred to in paragraph 10.7 of the Reg 18 draft Local Plan	LP278-16
45	Amend the supporting text for Policy H 1 (e.g. after 10.8 or 10.11) to state: “ <i>Higher densities will be supported around transport interchanges and Opportunity Areas</i> ” which would be consistent with the flexibility inherent in PfE Policy JP-H4.	No change proposed to the plan. Paragraph 10.7 refers to PfE Policy JP-H4 which sets minimum densities for housing developments, including higher densities closer to a range of public transport types.	LP272-8
46	H1 references PfE density policy JP-H4 - JP-H4 is flexibly worded in that development should have ‘regard to’ the densities set out in the policy, and explains why a development may not be able to achieve the densities	No change proposed to the plan. The Local Plan reflects PfE Policy JP-H4 sufficiently.	LP269-7

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	set out and that density should be appropriate for the location. H1 should ensure that this flexibility is accurately reflected.		
47	Encourage the Council to maximise density in the right locations where possible and avoid using density levels as a threshold, this can unnecessarily stifle development opportunity and housing delivery.	Change agreed, Proposed amendment to sentence under 'Southern Areas' in Policy H1 'In line with PfE Policy H4 housing is expected to be of a lower density in the Southern Areas with a significant proportion with over 50% of homes expected to have 3 or more bedrooms.	LP16-2
	Brownfield and Greenfield land		
48	Note that 10.10 states "Manchester...can demonstrate it has adequate land to deliver the level of housing committed to in the PfE." In fact the SHLAA can demonstrate enough land for 80,000 units on brownfield land alone, a buffer of 33% against the 61,000 target. This figure should be included and emphasised in the plan	No change proposed to the plan. The SHLAA is updated and published annually and so the number of units in the housing supply will change each year.	LP395-9
49	H1 could explicitly reference a preference for previously developed / brownfield land, and the second bullet in paragraph 10.5 should be strengthened to reflect the same 'brownfield preference' principles as are strongly threaded throughout PfE - the 80% is more a statement of reflecting the totals within the SHLAA than a target as such.	No change proposed to the plan. The reference to 80% of new homes on brownfield land in 10.5 comes from the Housing Strategy; and there is a focus on previously developed / brownfield land in the plan.	LP395-9
	Allocating sites for housing		
50	The Council should allocate HELAA sites for housing and demonstrate that they are developable during the plan period, including through viability testing. The plan proposes to introduce multiple new policy requirements	The Local Plan is accompanied by a Viability Assessment that has tested the policies within the plan.	LP387-3

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	for development, the viability of which was not considered through PfE viability work, and GMCA evidence shows that only 68% of HELAA sites are viable - and that figure is based on them delivering zero affordable housing. The remaining 32% is not viable even with zero affordable housing.		
51	A housing trajectory is needed, including the anticipated rate of development for specific sites, in accordance with paragraph 78 of the NPPF	A trajectory is published as part of the SHLAA report each year.	LP387-3
52	Viable sites which can deliver family and affordable housing should be allocated, realistically this means allocating greenfield sites in the Green Belt. A Green Belt review should be carried out to identify grey belt opportunities.	The Local Plan is accompanied by a Viability Assessment that has tested the policies within the plan. There is no need for a Green Belt review as this has already been carried out for Places for Everyone which sets the housing requirement for Manchester covered in the Local Plan.	LP387-3
	Affordable housing		
53	Affordable housing quotas should be set for each area, with 20-30% suggested, as although the policy references affordable housing it lacks clear targets or mechanisms, leaving delivery vulnerable to viability arguments. Tenure mix in City Centre schemes should be mandated to include family units and affordable housing.	No change proposed to the plan. The affordable housing target of 30% relates to the whole City and individual targets are avoided to ensure consistency of approach, as set out in Policy H2 Affordable Housing.	LP278-16
54	Affordable homes such as shared ownership are unaffordable for first time buyers in, for example, Chorlton because of the requirement and practice of over-inflating market valuations.	Affordable housing is defined in the NPPF, and changing the definition of market value is outside the scope of the plan.	LP267-14

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55	Risk that the terms <i>affordable housing</i> and <i>social housing</i> are being used interchangeably - in the context of paragraph 10.3 the increased demand for <i>affordable</i> housing must be understood primarily as a demand for <i>social</i> housing.	No change proposed to the plan. The HNA looks at need for social housing specifically, and that is reflected in Policy H2.	LP287-3
56	H1 should clearly define the intended balance of housing tenures, ensuring that sufficient private rented homes are delivered to meet growing demand, alongside an appropriate proportion of affordable and social rent housing to support access to accommodation for vulnerable young people. The proportion of these tenures should be defined using the data provided within the Manchester Housing Need Assessment.	No change proposed to the plan. Policy H2 sets out the expected tenure mix for affordable housing.	LP14-1
	Needs of specific groups of people		
57	Policy should encourage intergenerational housing schemes	No change proposed to the plan. Policy H7 refers to new residential development contributing to creating mixed communities.	LP28-22, LP384-1
58	Paragraph 10.4 should be amended to read "Increase affordable and accessible housing supply and build new homes for all residents".	No change proposed to the plan - accessibility is covered by Policy DM1 which states that buildings must be fully accessible to disabled people.	LP 385-17
59	Paragraph 10.7 should include Design for Access Standards and evidence to support up to 10% of new homes being built to the M4(3) standard, and there should be a policy to monitor construction to ensure compliance with this. (response has material/weblinks referenced)	Design for Access 2 was produced in 2003. It set out the City's aspirations for inclusive development. It was intended that the standards in Design for Access 2 should be used for all buildings and projects on which Manchester City Council lead or are the client, for the maintenance and improvement of highways, and	LP385-17

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		for all development on City Council disposal sites. As acknowledged by the Manchester Disabled Peoples Action Group, the document is in need of updating to reflect changes to legislation and policy since 2003. The document is not a statutory planning document and whilst parts of the document are still useful as a manual for architects, planners, engineers, landscape architects and other designers, it is not appropriate to embed it into statutory development plan policy. Therefore no change is proposed to the plan, although the paragraph in policy H4 that related to M4(2) and M4(3) has been moved to a separate new policy. Policy H3 requires a minimum of 4% of homes on schemes delivering ten or more units to be M4(3) compliant.	
60	Policies should ensure a mix of 1-4 bed homes are provided, including bungalows for older and disabled people and larger homes for families escaping domestic abuse	No change proposed to the plan – the supporting text for Policy H4 refers to accommodation for a range of people, including older and disabled people and those fleeing domestic abuse.	LP384-2
61	Right-sizing in paragraph 10.5 - many tenants are unaware of what this means, the current incentive (£2,500) should be increased to reflect current high costs involved in moving and dedicated officers should be appointed to publicise and support right-sizing initiatives. Mixed developments are essential to allow residents to downsize within their local area, and there	No change proposed to the plan. Policy H1 states that a range of housing types will be provided. The incentives offered for right-sizing and the appointment of dedicated officers to support right-sizing are beyond the scope of the plan.	LP287-3

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	should be a multi-agency approach to support people and promote right-sizing.		
62	The policy is not clearly related to existing need, and does not address requirements for downsizing, family provision in social rent, family sized homes or anticipated demographic changes across Manchester.	No change proposed to the plan. The HNA has considered these needs.	LPs 296-8, 308-22, 379-12
	Design and land use		
63	Housing delivery should be linked to health and wellbeing objectives, ensuring access to green space and social infrastructure	No change proposed to the plan – this is covered by Policy SP2	LP278-16
64	Questions why the policy doesn't mention bringing empty properties back into use	Change agreed. Reference to re-use of buildings added to Policy SP2 to state "Ensure efficient use of natural resources and reuse previously developed land and buildings wherever possible"	LP28-22
65	Redevelopment should be supported by appropriate Transport Assessments demonstrating potential vehicle trip impacts. National Highways will liaise with developers and MCC as strategic sites are developed to identify SRN impacts, particularly in Southern Areas where public transport access may be lower and private car reliance higher.	The Local Plan, alongside Places for Everyone, will form the development plan for Manchester. This issue is addressed through other policies in the plan. (Places for Everyone Policy JP C8) sets out transport requirements for new development including the need for transport assessments where appropriate). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP321-22
66	Nature should be accommodated alongside housing developments, for the sake of wildlife and so that residents can spend time in blue and green environments close to home	No change proposed to the plan. The plan should be read as a whole and policies elsewhere in the plan provide for this.	LP299-2

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67	Firm measures need to be taken against speculation and buy to let	This issue is outside the scope of the Plan	LPs 267-14, 292-11
68	Air BnBs should be restricted	It is acknowledged that short term lets can have an impact on availability of housing, however they also play a valuable role in providing accommodation options for visitors to the City. This use is difficult to control using current planning legislation, however Government has indicated an intention to introduce a new use class specifically for short term lets and potentially permitted development rights. If this is introduced, this would allow local authorities more control over distribution/concentration.	LP378-2, 292-11, 384-2, 267-14
69	Agent of change principle must be embedded across all relevant policy areas, with the duty placed on applicants, not established industry, to manage and mitigate impacts.	No change proposed to the plan. Policy DM1 has been amended to take account of agent of change.	LP382-9
70	Policy needs to reflect the new services required for a population increase of 122,000 people, assuming 2 residents for each of the 61,000 new homes. The retail requirements in the centres identified in the plan should be indicated.	No change proposed to the plan. The Retail and Leisure Study 2023 takes account of population growth, and the projected needs will be met by existing pipeline of retail developments.	LP282-12
	Other		
71	The mix of students, families and long term residents needs to be preserved, the balance is being threatened by PBSA increasing the burden on services	No change proposed to the plan. This is covered by Policy H7 which refers to proposals for PBSA integrating with neighbourhoods without increasing pressure on existing neighbourhood services to the detriment of existing residents.	LP378-2

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72	Policy should refer to delivery of alternative residential models so that such schemes are clearly recognised and supported. Amend H1 to <i>state</i> “Across the City, a range of housing sizes, types and tenures will be delivered to meet the need highlighted for each area of the city in the Housing Needs Assessment. This includes non-traditional alternative residential models such as coliving, compact, or income-linked independent living models ”.	No change proposed to the plan. Proposals for different types of residential models will be assessed against the policies in the plan.	LP314-2
73	H1 should make reference to sites within the city that are subject to development frameworks that have been adopted by the Council, and which promote new housing, such as the land off Ryebank Road in Chorlton (which is covered by the Ryebank Road Development Framework).	No change proposed to the plan. The locations referred to in the policy are large areas that can accommodate significant numbers of new dwellings. There are a lot of smaller sites across the city which are subject to development frameworks and whilst the units on these are included within the totals in H1, a list would be lengthy and would change frequently. The SHLAA is updated annually and includes these sites.	LP303-1

Question No 23 - Affordable Housing

Do you agree with this policy? Yes (6) In Part (156) No (2)

Yes (LP395-10, LP385-18, LP321-23, LP292-12, LP267-15, LP16-3)

In part (LP13-1, LP14-2, LP27-28, LP28-23, LP31-1 – LP180-1, LP272-9, LP280-6, LP381-2))

No (LP306-1, LP304-6)

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	Support		
1	General support	Support noted	LP16-3, LP28-23, LP31-180, LP261-28, LP267-15, LP284-16, LP290-7, LP292-12, LP303-2, LP321-23, LP374-8, LP385-18, LP395-10, LP497-1
2	Affordable housing provision should be supported	Support noted	LP321-23
3	Supports 30% affordable housing and tenure split	Support noted	LP31-180, LP267-15
4	Support clear affordable target; tenure mix; on-site requirement; and viability reconciliation mechanism	Support noted	LP278-17
5	Noting the challenge to deliver 20% affordable housing, support clause 'inclusion of affordable housing would prejudice other important planning regeneration objectives...'	Support noted	LP284-16
	Increase affordable/social housing requirements		

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6	Targets should be increased as they are insufficient to meet the current demand for social rent in particular	No change proposed to the plan. Targets set based on HNA	LP27-28, LP349-2
7	The Plan should require 30% social housing	No change proposed to the plan. Targets set based on HNA	LP374-8, LP384-11, LP393-7, LP383-3
8	The Plan should require 30% social housing subject to ongoing government grant	No change proposed to the plan. Targets set based on HNA	LP388-2
9	With increases in central government grants the plan should require 30% social housing and further 20% of other affordable	No change proposed to the plan. Targets set based on HNA	LP296-9, LP308-23, LP383-3
10	Manchester needs to require a higher percentage of social housing to meet demand	No change proposed to the plan. Targets set based on HNA	LP261-28, LP287-4, LP290-7, LP292-12, LP304-6, LP363-1
11	Recommend 50% affordable housing which includes 30% social based on recent evidence showing 32% of homes across the city-region should be social rent	No change proposed to the plan. Targets set based on HNA	LP379-13
12	More affordable housing needed in Chorlton	No change proposed to the plan. Comment noted but targets are set following HNA and will not be set by ward.	LP497-1
	Viability		
13	The proposed uplift to 30% affordable homes presents significant viability challenges, particularly for City Centre schemes and should be reconsidered as it could deter inward investment into the city.	No change proposed to the plan. Targets set based on HNA and have been subject to a Viability Assessment	LP280-6, LP283-3
14	Suggest new text to add greater clarity including that if full requirement has been demonstrated not to be viable the Council will work with developer to secure	No change proposed to the plan. The policy states that 30% is a starting point for calculating affordable housing provision and the policy is	LP272-9

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	maximum viable amount of affordable housing. To achieve this the Council should consider mechanisms including: prioritising tenures that meet local need; proportionate flexibility in other policy requirements; encourage and expect applicants to pursue grant funding; and inclusion of late stage viability review mechanism within S106 agreement	flexible enough to consider individual circumstances.	
15	Concerned that developers will use viability assessments to avoid providing 30% affordable housing	No change proposed to the plan, but concern noted and has been raised elsewhere in the consultation.	LP14-2, LP28-23, LP31-180, LP278-17, LP287-4, LP349-2, LP381-2
16	Viability assessments should be publicly available	No change proposed to the plan. Viability Assessments are publicly available.	LP272-9
17	To prevent abuse of exemptions, Viability Assessments (VAs) should be carried out independently; available for public view; should follow consistent guidelines; and should include reconciliation mechanisms where obligations have been reduced	No change proposed to the plan. Viability Assessments on planning applications are made public and are assessed as part of the decision-making process.	LP287-4
18	There is no supporting viability study so cannot ascertain if options are realistic or deliverable	The Viability Assessment study is published as part the Reg 19 consultation	LP306-1
19	It is currently unclear whether the affordable housing requirement has been informed by a whole-plan viability assessment so as to demonstrate that this amount of affordable housing on development sites will not undermine viability	The Viability Assessment study is published as part the Reg 19 consultation	LP269-8
20	Too many 'get out' clauses in policy	No change proposed to the plan, which must allow for consideration of all circumstances.	LP349-2, LP404-9
21	Criteria for variation of S106 on viability grounds needs to be clear	No change proposed to the plan, which must allow for consideration of all circumstances. The	LP381-2

	Respondents comments	MCC Response	Respondent ID
		plan should be read as a whole and Policy DC1 states that in determining the nature and scale of any planning obligation, specific site conditions and other material considerations including viability, redevelopment of previously developed land or mitigation of contamination may be taken into account.	
	Site Specific Assessments		
22	The policy should take a flexible approach allowing site-specific assessments to determine affordable housing contributions. A range of mechanisms should be supported and the overall package of benefits for regeneration considered	No change proposed to the plan. Current policy meets these requirements.	LP272-9, LP280-6
23	It is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high, as this will jeopardise future housing delivery	No change proposed to the plan, which must allow for consideration of all circumstances.	LP269-8
	Housing Associations		
24	Support ambition to increase affordable housing requirement but it presents considerable viability challenge for housing associations	No change proposed to the plan, which allows for consideration of individual circumstances.	LP16-3
25	Encourage Manchester City Council and MHCLG to explore mechanisms that provide greater funding certainty and support long-term viability for affordable housing providers	Other than planning obligations, funding mechanisms are outside the scope of the Local Plan	LP16-3
26	As grant funding cannot be applied to planning-mandated affordable units, this policy change will place additional pressure on scheme viability	No change proposed to the plan, which allows for consideration of individual circumstances.	LP16-3
	Housing Needs Assessment		

	Respondents comments	MCC Response	Respondent ID
27	HNA does not provide a detailed disaggregation by size or tenure, leaving the policy unanchored in robust evidence, contrary to the NPPF, paragraph 68.	The HNA includes tables showing the need for different sizes and tenures of housing and provides a robust evidence base.	LP296-9, LP379-13, LP308-23
28	Statistics in HNA significantly out of date	The HNA has been refreshed for the Reg 19 consultation	LP296-9, LP308-23, LP381-2
29	HNA affordable need (1,142pa) conflicts with PfE SHMA (1,810pa)	The HNA has been refreshed and provides the most up to date evidence of affordable housing need.	LP387-4
	Smaller sites		
30	Nothing in plan about when smaller sites (<10 units) would need a higher affordability target	No change proposed to the plan. Small sites are not required to deliver affordable housing.	LP381-2
31	Concerned that smaller sites will not provide affordable units to meet needs	No change proposed to the plan. Small sites are not required to deliver affordable housing. However, the Council is running a programme providing affordable housing on small council owned sites.	LP267-15
	Tenure Mix		
32	Tenure split is unclear and needs clarification	Change agreed. The text has been amended as follows 'The tenure split for affordable housing provision, across the city , is expected to be 70% social housing, 10 80% other affordable rent and 20% affordable home ownership housing. Social rented housing is expected to make up 70% of the affordable housing provision.	LP13-1, LP16-8, LP287-4, LP379-13, LP308-23
33	Allowing variation in tenure mix could dilute social rent provision	No change proposed to the plan. Providing social housing is a priority but the policy must be flexible to allow other forms of affordable housing.	LP278-17

	Respondents comments	MCC Response	Respondent ID
34	There needs to be safeguards to ensure mixed tenure and avoid segregation by wealth	No change proposed to the plan. The policy states that 'Affordable housing should be provided on site, be inclusively designed to reflect the character of development on the site and indistinguishable from other units.'	LP267-15
35	There should be flexibility in tenure split to reflect local circumstances or where no RP can be found to acquire properties	No change proposed to the plan, which allows for consideration of individual circumstances.	LP269-8
36	Policy should explicitly recognise income-linked rental products as affordable housing	No change proposed to the plan. The policy uses NPPF definition of affordable housing.	LP314-1
37	Proposed new text for H2 to support for innovative affordable housing models including income-linked or transitional accommodation	No change proposed to the plan. Any product meeting the NPPF definition will be considered affordable.	LP314-1
38	Affordable requirement should cross reference with need for different sized units	No change proposed to the plan. The affordable housing target of 30% relates to the whole City and individual targets are avoided to ensure consistency of approach, as set out in Policy H2.	LP381-2
	S106, Monitoring and Transparency		
39	Target should be closely monitored and published	Delivery of affordable housing is monitored in the Council's Authority Monitoring Report	LP278-17, LP287-4, LP381-2
40	Local community should see how contributions towards affordable housing are spent	The Council reports annually on how s106 (planning obligation) funds are used.	LP278-4, LP287-4
41	All development should provide a minimum of 20% affordable or make financial contribution	The policy gives a minimum of 30% provision on site or financial contribution in line with the HNA	LP267-15, LP397-2
42	Agree that S106 should be used to provide affordable homes	Support noted	LP381-2
43	Need to be clear that S106 applies to all affordable homes including social housing	No change proposed to the plan. S106 agreements can cover a wide range of issues including affordable housing.	LP381-2

	Respondents comments	MCC Response	Respondent ID
44	Link commuted sums to ring-fenced affordable housing delivery	No change proposed to the plan. This would be the subject of individual s106 agreements and would not be specified in policy.	LP278-17
45	Add subsection requiring minimum expected commuted sum equivalent to building 30% affordable housing with 70% of it being social.	No change proposed to the plan. Where on-site provision is not possible the policy already requires an equivalent financial contribution.	LP31-180
	Policy Interpretation & Definitions		
46	Object to categorising social rented housing as “inappropriate”; and the term "prejudicial" should be explained	Change agreed. The Policy explains what is meant by inappropriate but is meant to apply to all affordable housing therefore policy amended to replace ‘ intermediate or social rented ’ to ‘ affordable ’. Also to clarify meaning, in the first bullet ‘ be prejudicial to ’ is amended to ‘ be harmful to ’	LP296-9, LP308-23, LP349-2, LP379-13, LP388-2
47	Policy should follow NPPF para 66	The policy follows the evidence provided by the HNA which has assessed local need in line with the NPPF.	LP388-2
48	Housing section is too jargonistic and difficult to understand	A glossary is now provided to clarify terms used in the plan.	LP349-2
49	Definition of Affordable housing unclear	The footnote to the policy explains the definition of affordable housing with further detail available by following the link to NPPF.	LP28-23, LP309-23
50	'Affordable homes' are not affordable to most people	What is affordable is considered in the HNA but the document must use the definition provided in the NPPF	LP349-2
51	Plan should use definitions of affordable housing types as set out in NPPF Annex 2	Change agreed. To clarify text has been amended as follows ‘The tenure split for affordable housing provision, across the city , is expected to be 70% social housing, 10 80%	LP296-9, LP379-13, LP308-23

	Respondents comments	MCC Response	Respondent ID
		other affordable rent and 20% affordable home ownership housing.'. The policy does not distinguish between discounted market sales and other routes to home ownership.	
	Build-to-Rent		
52	In line with NPPF, H2 should confirm affordable housing in BTR should be affordable private rent at 20% less than open market rent and managed by the same operator as the market value BTR	****New policy on BTR ***	LP352-1
	Older Persons Housing		
53	Viability of older persons housing is more finely balanced and the typologies needed should be assessed separately	No change proposed to the plan, which allows for consideration of individual circumstances.	LP306-1
54	Affordable housing targets for general housing should not apply to older persons housing	No change proposed to the plan, which allows for consideration of individual circumstances.	LP306-1
55	More flexible tenure mix should be allowed for older persons' housing/flatted developments; single tenure may be needed	No change proposed to the plan. The tenure split is across all affordable housing and is not required to be applied to each individual scheme.	LP13-1
	Larger Homes and Family Accommodation		
56	Insufficient provision for affordable larger family accommodation	No change proposed to the plan. Policy H1 supports the provision of larger homes and all proposals will be subject to the affordable housing requirements set in policy H2.	LP261-28, LP290-7, LP292-12
	Young People		
57	Policy should assess demand for social housing among vulnerable young people to ensure adequate supply of affordable and social one-bedroom properties	Additional table added to text under Policy H1 and table 10.2 showing range of affordable home sizes needed across the city.	LP14-2
	Key Worker Housing		

	Respondents comments	MCC Response	Respondent ID
58	In continuing to develop this policy, we recommend that the Council engage with local NHS partners; ensure affordable housing for NHS staff is taken into account; and consider sites near large healthcare employers.	Comment noted	LP319-4
59	More housing needed for low-wage service sector workers and their families	Additional table added to text under Policy H1 and table 10.2 showing range of affordable home sizes needed across the city.	LP308-23
	Other		
60	Developers should have access to fast-track process if they commit to providing 32% social housing	Comment noted but a fast track process is not part of the policy approach set out in the Local Plan.	LP287-4
61	Affordable housing targets should be enforced	No change proposed to the plan. The policy must allow for consideration of individual circumstances.	LP374-8
62	Too many brownfield sites delivered without affordable housing	Comment noted. The policy supports the city's aim to increase delivery of affordable housing across the city.	LP395-10
63	Early Liaison with National Highways recommended for larger strategic sites	Comment noted	LP321-23
64	Recommend exemptions to providing social housing are amended to ensure they are unambiguous and only granted in exceptional circumstances	Policy amended to replace ' intermediate or social rented ' to ' affordable '. Also to clarify meaning, in the first bullet ' be prejudicial to ' is amended to ' be harmful to '. No further amends proposed as it is clear when exemptions may be permitted.	LP14-2

Question No 24 - Accommodation for Gypsies and Travellers and Travelling Showpeople**Do you agree with this policy? Yes (3) In Part (3) No (0)****Yes (LP385-19, LP321-24, LP309-24)****In part (LP381-3, LP28-24, LP9-8)**

	Respondents' comments	MCC Response	Respondent ID
1	Agrees with the policy, no specific comments	Support noted.	LP385-19, LP309-24
2	Agrees with the policy in part, no specific comments	Support noted.	LP28-24
3	Request an opportunity to comment on specific sites in due course	Comment noted.	LP386-17, LP321-24
	Existing Sites		
4	Policy should be amended to include protection or enhancement of the existing GM sites	No change proposed to the plan. Currently no existing site in Manchester and issues for other sites in Greater Manchester would be addressed by the relevant local authority.	LP381-3
5	Policy doesn't address the issue of improvements needed on existing sites	No change proposed to the plan. Currently no existing site in Manchester.	LP381-3
6	All existing sites should be protected, and should meet minimum standards of provision and management.	No change proposed to the plan. Currently no existing site in Manchester and issues for other sites in Greater Manchester would be addressed by the relevant local authority.	LP379-14, LP308-24, LP296-10

	Respondents' comments	MCC Response	Respondent ID
	New Sites		
7	Surrounding environment should be considered to avoid contamination from neighbouring uses.	No change proposed to the plan. The plan should be read as a whole including Policy DM1 which sets out general considerations for all proposals including neighbouring amenity matters.	LP381-3
8	Sites should be integrated well into existing communities to foster good relations.	Comment noted.	.LP381-3
9	New sites should meet the requirements of NPPF paragraph 104 (to prevent loss of playing fields or sports facilities)	Comment noted.	LP9-8
	Other		
10	Policy doesn't fulfil the whole GTAA requirement (191 across GM)	The evidence base sets out the need for 17 pitches in Manchester (the figure referred to is the need identified for the whole of Greater Manchester)	LP381-3

Question No 25 - Supported Housing

Do you agree with this policy? Yes (6) In Part (8) No (1)

Yes (LP321-25, LP309-25, LP306-2, LP299-3, LP292-13, LP267-16)

In part (LP385-20, LP381-4, LP304-7, LP28-25, LP26-1, LP14-3, LP13-3, LP9-29)

No (LP21-1)

	Respondents comments	MCC Response	Respondent ID
	Support		
1	Agree with policy	Support noted	LP299-3, LP303-3, LP309-25, LP321-28
2	Agree with policy but suggest renaming as ' Supported Housing and Specialist Housing for Older People '.	Support noted. Policy will be renamed ' Enabling Independence and Supported Housing'. The definition of supported housing is clarified under the policy by adding ' includes specialist housing and ' after 'the term 'supported housing'	LP306-2
3	Support Clear Commitment to Inclusivity; Integration with Accessibility Standards and Strategic Alignment with PfE (Places for Everyone)	Support noted	LP278-18
4	Generally supportive of providing homes that are suitable to meet the needs of older people and disabled people	Support noted	LP269-9
5	Support and welcome policy but policy should clarify that priority should be given to specialist housing when there is conflict with other policies	Support noted No change proposed to the plan. The plan should be read as a whole and does not prioritise one policy over another. Priority for a particular site will be determined on a case by case basis.	LP264-4

	Respondents comments	MCC Response	Respondent ID
6	Support the policy to build more supported accommodation and to ensure that the new homes are accessible and adaptable	Support noted	LP14-3
7	It is positive that the Council will support schemes that provide appropriate accommodation for children in care and young people leaving care	Support noted	LP14-3
	Distribution and Density		
8	Plan should identify (type of and) where supported housing is required	No change proposed to the plan. The plan covers a period up to 2039 and cannot identify all sites and specific needs that will be required over this period.	LP296-11, LP379-15
9	Request a fairer city-wide distribution of supported housing so no area bears a disproportionate share.	No change proposed to the plan. It is not possible to keep an up to date publicly available map due to the sensitive nature of some of supported accommodation. The policy will ensure no one area is adversely impacted by new development of this type as it includes the requirement to meet the needs of the local community and the city's strategic requirements and must not materially harm the character of the area.	LP26-1, LP293-2
10	Local Plan should make explicit reference to the density and distribution of supported housing	As point 9 above.	LP30-4
11	Concern that policy is weaker than current Core Strategy Policy H10 and urge reintroduction of clear protections, including safeguards against over-concentration, assessment of infrastructure capacity and measures to maintain <i>and restore</i> residential character and stability	As point 9 above. Impact on the local area and services will be assessed through Policy DM1.	LP293-2
12	Propose adding ' Proposals for accommodation for people with additional support needs will not be	As point 9 above.	LP297-11, LP351-2

	Respondents comments	MCC Response	Respondent ID
	supported where there is a concentration of similar uses in the neighbourhood already.'		
13	Recommend that the Council should work with providers of this type of development to identify appropriate specific sites for allocation	As point 8 above.	LP13-3, LP269-9
	Requirement/prevention of supported housing		
14	Noting shortage of longer-term provision, recommend amending the policy to explicitly state that supported housing “will be required” as part of all major development schemes, including both short-term and longer-term provision	Supported housing needs to be in line with strategic needs and it will often not be appropriate in all schemes.	LP379-15
15	Suggest that the policy is amended to specifically state that supported housing ‘will be required’ in major developments	As point 14 above.	LP296-11, LP308-25
16	The policy does not address when an ordinary house could or could not be turned into supported living eg should be safe garden space for vulnerable children	A normal house and a smaller supported housing facility are both Planning Use Class C3 and therefore do not need planning permission to convert from one to the other. The policy does require the development to meet the strategic requirements of the city to ensure facilities are suitable.	LP304-7
17	Moves to provide care in larger settings should be resisted	The policy does require the development to meet the strategic requirements of the city therefore any proposal that does not satisfy this requirement will not be supported.	LP261-29, LP292-13
18	Policy includes a criterion to incorporate housing provision specifically targeted at older people within new residential development. Neither the policy nor the accompanying text states if there is a threshold for such a requirement	No change proposed to the plan. Although a target is not set the second paragraph under the policy highlights the need established within the HNA.	LP269-9

	Respondents comments	MCC Response	Respondent ID
19	The policy should also include a delivery target for older persons' housing to ensure identified needs are met over the plan period.	No change proposed to the plan. Although a target is not set the second paragraph under the policy highlights the need established within the HNA	LP13-3
	Specific support needs		
20	Whilst accepting the need for specialist supported housing for some I really want to live in an all age community which I believe is healthier for both young and old.	The policy supports and promotes providing housing for older people within residential areas.	LP349-6
21	Policy should encourage intergenerational housing schemes	The policy supports and promotes providing housing for older people and others with support needs within new residential areas.	LP28-25, LP384-1
22	There should be more hostels for Manchester's homeless population with additional support for mental health/addiction issues.	Comment noted, the policy supports accommodation for people with mental health/addiction issues.	LP344-9
23	Centrepont would recommend that Policy H4 be expanded, or updated, to explicitly reference transitional supported independent-living accommodation for young working people leaving care, apprenticeships or supported housing, recognising this as a distinct typology, and providing policy support for income-linked tenures and compact units. Proposed new policy wording: Policy HX: Non-Traditional Residential accommodation To support a diverse, inclusive and adaptable housing market, the Council will encourage the development of non-traditional housing typologies that respond to changing local needs, lifestyles, and affordability challenges.	Change agreed. The policy would already cover the non-transitional residential accommodation described however the following amends to the criteria are proposed: • Add 'an identified need' and' after 'meet' in the 5th bullet point • Add new bullet point 'where relevant, include appropriate management and support arrangements' • Add new bullet 'where relevant, demonstrate that affordability of care to proposed residents has been considered.' Meeting Nationally Described Space Standard (NDSS), this is applied though PfE. It applies to all	LP314-3

	Respondents comments	MCC Response	Respondent ID
	These may include but are not limited to large scale purpose built shared living accommodation such as coliving, as well as compact housing, income-linked supported homes, and independent-living accommodation for young people. Development proposals for such models will be supported where they: a. Meet an identified local housing need, including for groups under-served by the traditional housing market such as young people, key workers, or those transitioning from supported accommodation; b. Are of high-quality design, with adequate natural light and access to shared or communal facilities proportionate to the housing type proposed, but are exempt from Nationally Described Space Standards; c. Include appropriate management and support arrangements, particularly for accommodation designed for specific groups such as young people leaving care or those at risk of homelessness; d. Are located in sustainable and accessible locations, including regeneration and growth areas, with good access to employment, education, and public transport; and	Use Class C3 dwellings and cannot be varied. Where supported housing is not a C3 dwelling eg classed as a care home (C2) or an HMO (C4), the NDSS will not apply.	

	Respondents comments	MCC Response	Respondent ID
	e. Do not undermine the delivery of traditional affordable housing but rather complement and diversify the city's overall housing offer. Where income linked homes are proposed, they should provide genuine affordability, demonstrated through rent or sale prices linked to income levels or other transparent affordability mechanisms;		
24	Encourage the council to continue meeting needs in non-segregated, non-congregate settings, with levels of staff support adjusted to ensure the inclusion and effective support of disabled householders across tenure classes	No change proposed to the plan. This is outside the scope of the Local Plan	LP267-16, LP292-13
25	Surprised there is no mention of Housing First schemes for homeless people	No change proposed to the plan. The policy supports schemes providing supported housing and text below the policy clarifies that supported housing covers individuals and families at risk of, or who have experienced homelessness.	LP261-29, LP292-13
26	The Council should also consider providing supported accommodation for homeless young people who do not qualify as care leavers	No change proposed to the plan. The policy supports schemes providing supported housing and text below the policy clarifies that supported housing covers individuals and families at risk of, or who have experienced homelessness.	LP14-3
27	Recommend that the Plan amend policy by specifying the additional units required for all types of supported accommodation, including provision for young people and care leavers	No change proposed to the plan. The aim of the policy is to support supported housing and specialist housing that meet the strategic requirements of the city but detailed requirements for individual types of provision is outside the scope of the Local Plan.	LP14-3

	Respondents comments	MCC Response	Respondent ID
28	We welcome this policy which supports housing for older people; however we are concerned that combining it with a policy on children in care and people with disabilities may reduce the effectiveness for delivery of older persons housing. We would recommend that it is split into separate policies for each.	Change partly accepted. The section on accessibility has been removed and is now a separate policy. Having a separate bullet point that supports housing for children in care does not impact the support for older person's housing.	LP13-3
29	We note that the draft policy prioritises retirement housing, extra care, and senior co-housing communities for older people. All specialist housing types, including care homes, should be supported in accordance with national planning policy	No change proposed to the plan. The policy supports all supported housing but the highlighting of retirement housing, extra care, and senior co-housing communities for older people is in line with the Council's Enabling Independence Accommodation Strategy (2022).	LP13-3
30	Recommend policy updated to; secure a diverse mix of 1-4 bed homes and apartments, including bungalows for older and disabled residents and 3-bed+ houses for families fleeing domestic abuse; and provide supported and accessible homes for people with learning disabilities, teenage mothers and those with complex care needs.	No change proposed to the plan. The aim of the policy is to support supported housing and specialist housing that meet the strategic requirements of the city but detailed requirements for individual types of provision is beyond the scope of the Local Plan.	LP384-3
	Supported Housing as HMOs		
31	Noting that some areas have lost much family housing to HMOs, we need safeguards to protect against the conversion of housing suitable for families to Supported Housing	No change proposed to the plan. The plan must be read as a whole so any proposed development would also be subject to the Houses in Multiple Occupation policy	LP304-7, LP393-3
	Accessible Housing		

	Respondents comments	MCC Response	Respondent ID
32	Accessible Housing is not the same thing as Supported Accommodation and should be a separate section	Change agreed. Accessible Housing has now been removed and become a separate policy.	LP381-4, LP385-20
33	Policy appears to focus on providing M4(3) homes for older people but HNA shows the biggest group needing wheelchair dwellings is under 65s needing 3-bed properties	Accessible Housing is now a separate policy and does not focus on older people.	LP21-1
34	M4(3) should not just apply to social housing	M4(3) has been applied to all housing	LP21-1
35	Believe 3.6% of new housing to be M4(3) standard is too low	The % requirement is based on recommendations in the HNA which has been refreshed in 2026	LP21-1, L261-29, LP267-16, LP292-13, LP385-20
36	Propose that 10% of all new housing in the private and social sectors should be accessible to M4 (3) standards	The % requirement is based on recommendations in the HNA which has been refreshed in 2026	LP21-1, LP353-1, LP381-4, LP385-20
37	All new homes should be accessible for residents and visitors	The % requirement is based on recommendations in the HNA which has been refreshed in 2026	LP349-6
38	Policy does not distinguish between M4(3)a i.e. wheelchair adaptable and M4(3)b i.e. wheelchair adapted in that 3.6%	As explained in the text below the policy, M4(3)(2b) can only be applied when required by the social housing provider for a person with specific needs. If required this will be applied to the planning permission through a planning condition and will be assessed as part of Building Regulations.	LP381-4
39	Council need to ensure policy is consistent with PPG that is clear that local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for	The policy is consistent with PPG. M4(3)(2a) is called 'wheelchair adaptable' and the text below the policy explains that, M4(3)(2b) can only be applied when required by the social housing provider for a person with specific needs. If required, this will be applied	LP269-9

	Respondents comments	MCC Response	Respondent ID
	allocating or nominating a person to live in that dwelling	to the planning permission through a planning condition and will be assessed as part of Building Regulations.	
40	Accessibility requirements should be broken down to show requirements by type, tenure and size	The requirements are based on the HNA which is not required to provide this level of detail.	LP381-4
41	Plan needs to grapple with the provision of commercial units at ground level of mid/high-rise residential buildings in conflict with the relative ease of providing M4(3) apartments on the ground level.	The Council does consider policies requiring M4(3) accessibility and active ground floor uses as a conflict.	LP381-4
42	It's not just wheelchair users who lack accessible accommodation	Comment noted. Policy DM1 states that buildings and neighbourhoods must be fully accessible to disabled people.	LP354-1
43	Note we have no accessible temporary housing, or accessible emergency housing, or accessible refuge space	Comment noted. Any new proposals would be subject to the plan policies, but the condition of current facilities is outside the scope of the plan.	LP353-1
44	It is requested that clarifications are added to paragraphs 10.29 and 10.31 respectively, to denote exemption from these standards for specific housing models, such as the Independent Living Programme, where there is a specific justification for doing so	When the Building Standard is applied it is applied as written and cannot be amended. However, it only applies to new dwellings which generally means self-contained residential units.	LP314-3
	Viability		
45	Request the policy to be amended to allow a more proportionate approach to delivery of Part M4(3) dwellings to allow for developers to provide evidence if and when it is not feasible to provide these dwellings for high-rise or City Centre core sites due to technical constraints and buildability factors.	Text under the policy explains that 'In applying Part M4 (3) to development proposals, the City Council will take account of site-specific factors .. Where evidence is submitted to demonstrate that step-free access is not viable, there will be no requirement for Building Regulations M4(3).'	LP282-2

	Respondents comments	MCC Response	Respondent ID
46	Introduce capital grants or planning incentives to offset costs of M4(3) compliance	Grants are outside the scope of the Local Plan. The document should be applied as a whole and no one policy is given priority allowing consideration of individual circumstances.	LP278-18
47	Pair housing delivery with guaranteed funding for support services.	This is outside the scope of the Local Plan	LP278-18
48	Allow phased implementation or viability-based exemptions for smaller schemes.	Where evidence is provided of viability constraints this will be considered on an individual basis.	LP278-18
	Cohousing		
49	Co-housing for Seniors is mentioned. We would like co-housing possibilities to be available across the board. This is an opportunity for Manchester to lead the way in providing co-housing and community-led housing. Could they be included?	The Local Plan supports this type of development but the delivery is outside the scope of the Local Plan.	LP267-16
50	Reference to ‘Senior Cohousing communities’ should be omitted from Policy H6 as this is in conflict with the requirement for support, supervision or care to be provided. It should instead be incorporated within the policy related to Community Led Housing which as identified should also encompass other forms of Cohousing in addition to Senior Cohousing.	Change agreed. The title of policy is now ‘ Enabling Independence and Supported Housing’. The policy supports development that diversify options for older people. The title of the policy has been amended to make clear that it applies to more than just supported housing.	LP392-2
	Other		
51	There is scope to include community led housing as an empowering option for people who are preparing to leave supported housing and live more independently in the community	No change proposed to the plan. Community-led housing is supported through policy H6 (Policy H9 in Reg 19 draft)	LP392-2
52	People with a learning disability should be “learning disabled people.”	Change agreed. The policy now refers to People with Disabilities and refers to definition in NPPF. The	LP385-20

	Respondents comments	MCC Response	Respondent ID
		accompanying text where the term ‘Supported Housing’ is explained has been amended to change ‘ people with a learning disability ’ to ‘ learning disabled people ’	
53	Establish robust oversight to prevent poor-quality provision and ensure strategic targets are met.	Comment noted. Robust oversight will be provided through the Council’s Enabling Independence Accommodation programme	LP278-18
54	Should any development proposals result in loss off playing field land or sports facilities, for example as a site used as a workplace sports facility, this policy wording is not considered to be strong enough to ‘protect’ existing facilities. Any such proposals will need to meet the requirements of NPPF paragraph 104.	The NPPF provides significant policy direction regarding playing fields. The Local Plan picks up the approach to playing fields in Policies EN1 and SI1.	LP9-29

Question No 26 - Purpose Built Student Accommodation

Do you agree with this policy? Yes (5) In Part (7) No (3)

Yes (LP321-26, LP316-3, LP309-26, LP297-7, LP284-17)

In part (LP385-21, LP381-5, LP300-7, LP267-17, LP28-26, LP20-6, LP9-36)

No (LP304-8, LP264-5, LP26-3)

	Respondents comments	MCC Response	Responder ID
1	Support	Noted	(JP309-26, LP316-3, LP321-26, LP297-7, LP285-9, LP284-17)
2	Support in part	Noted	(LP9-36, LP20-6, LP28-6, LP267-17)
3	Do not support	Noted	(LP26-3, LP264-5,

	Respondents comments	MCC Response	Responder ID
4	There should be no more student accommodation built, existing buildings should be used	No change proposed to the plan. There is a clear need for more student accommodation. The evidence that supports the Local Plan sets out the need expected to occur over the next few years.	(LP344-10)
5	There is no policy guidance for student accommodation which is not purpose built	No change proposed to the plan. Non-PBSA accommodation would be guided by the general policies regarding housing supply.	(LP264-5)
	Locational criteria		
6	Concern that Policy H5 appears to support more PBSA in Moss Side due to the proximity to the university. Concentrating large numbers of students in within an area is detrimental to the quality of life of the long standing residents, and the known and documented problems experienced by residents in Fallowfield and Withington must be learnt from and avoided in future. No clear evidence to justify the need for more PBSA in Hulme and Moss Side.	No change proposed to the plan. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	(LP308-26, LP393- 8)
7	Policy H5 could be used to justify more PBSA in Fallowfield. Local residents do not support this. Recommend the policy is amended to explicitly limit new PBSA beyond existing permissions; safeguard Oakley Villa and similar designated and non-designated heritage buildings, and assess cumulative impacts on PBSA, tall buildings and long term community sustainability	No change proposed to the plan. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community	(LP293-5)

	Respondents comments	MCC Response	Responder ID
		concerns are considered in planning proposals.	
8	Object to the current wording in the draft and suggest new wording to "Student accommodation should closely integrate with existing neighbourhoods in a positive way without increasing pressure on existing neighbourhood services or causing detriment to existing residents. "	No change proposed to the plan. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	(LP393-8, LP388-4,LP379-16)
9	The Aquarius Community believe that the proximity of additional student accommodation would further undermine the character of the local community. It supports the statement in Policy H5 that states that student accommodation should not increase 'pressure on existing neighbourhood services to the detriment of existing residents' and believe that this should mean that there is no further PBSA within the Aquarius Area.	Comment noted. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	(LP383-9)
10	Concentration of students close to universities damages the balance of neighbourhoods. Neighbourhoods further away from student areas could benefit from PBSA Policy should allow for PBSA in locations accessible to the university campuses by public transport	No change proposed to the plan. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	(LP26-3, LP304-8) (LP264-5)
11	MMU suggests that the criteria that all PBSA should be located in 'close proximity' to the university campuses be reconsidered. This is likely to put	Comment noted. The plan should be read as a whole and in particular	(LP30-2)

	Respondents comments	MCC Response	Responder ID
	considerable pressure on nearby neighbourhoods which already have high student populations; not to mention on strained, over-crowded public transportation along the Oxford Road Corridor. MMU research suggests the need for a city-wide strategy for developing safe, affordable and well-connected student accommodation across Manchester, in PBSA as well as other housing forms.	policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	
12	Developers are expected to liaise with National Highways to identify traffic impacts and any necessary mitigations. Where sites are close to strategic routes, an appropriate Transport Assessment should demonstrate individual and cumulative impacts on the local network and SRN.	No change proposed to the plan. The Local Plan, alongside Places for Everyone, will form the development plan for Manchester. This issue is addressed through other policies in the development plan. (Places for Everyone Policy JP C8 sets out transport requirements for new development including the need for transport assessments where appropriate). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	(LP321-26)
	Evidence of need		
13	Research undertaken by UoM/MMU identifies significant under-provision of purpose built student bedrooms as compared to other multi-university cities.	Comments noted	(LP316-3)
14	There is clear evidence of need for more PBSA. Inability to provide this will put more pressure on family homes and apartments in the city centre and lead to an increase in HMOs	Comments noted	(LP270-1)

	Respondents comments	MCC Response	Responder ID
15	No clear evidence to justify the need for more PBSA in Hulme and Moss Side.	Comments noted. It is considered that there is clear evidence of need which is set out in the accompanying documentation to the Local Plan.	(LP308-26, LP393- 8)
16	UoM does not believe that the draft policy truly seeks to support the development of PBSA in the city in a sustainable manner. Clarity should be provided on the definition of 'need for additional student accommodation'	Comment noted. The evidence that supports the Local Plan sets out the need expected to occur over the next few years.	(LP20-6)
17	Inconsistency between H5 and SGL2 - H5 requires development to demonstrate need for PBSA, but SGL2 refers to 'meeting demand 'for 'high quality' PBSA. The only requirement in SGL2 is to demonstrate high quality development.	Comment noted. Policy GL2 has been amended to refer to the need for quality student accommodation.	(LP264-5)
	Affordability and viability		
18	Policy needs to reflect the NUS affordable rent which should be no more than 50% of the maximum student maintenance loan.	Work undertaken for the viability assessment and supporting evidence specifically looking at student accommodation affordability has informed the policy approach now set out in the Local Plan.	(LP379-16)
19	UoM strongly welcomes the inclusion of affordable housing clause. Concerned that 80% of market rate may not constitute as affordable. Furthermore the policy does not contain guidance on how the affordable bed spaces would be allocated to students.	Work undertaken for the viability assessment and supporting evidence specifically looking at student accommodation affordability has informed the policy approach now set out in the Local Plan.	(LP20-6)

	Respondents comments	MCC Response	Responder ID
20	MMU would welcome the City Council imposing an affordability criteria on all PBSA developments in Manchester to ensure a significant proportion of every development (a minimum of 20% of beds) has rooms which are no more than 80% of the maximum maintenance loan available to students. Disappointed that the draft policy is linked to market rates. This can increase rapidly and is likely to have knock-on impacts on affordability in nearby neighbourhoods. 80% of market rate may not constitute as affordable	Work undertaken for the viability assessment and supporting evidence specifically looking at student accommodation affordability has informed the policy approach now set out in the Local Plan.	(LP30-2, LP316-3, LP20-6)
21	Supports the policy in part as it is continuation of Core Strategy Policy H12 which is considered to have been effective. Notes addition of affordability criteria and requests that a new paragraph around viability should be inserted to align with national policy	Support noted. Work undertaken for the viability assessment and supporting evidence specifically looking at student accommodation affordability has informed the policy approach now set out in the Local Plan.	(LP300-7)
22	Unable to comment further on the new affordability clause until the viability evidence has been provided. Introduction of affordable rent would have significant adverse impact on viability and deliverability of PBSA schemes	Comment noted. Work undertaken for the viability assessment and supporting evidence specifically looking at student accommodation affordability has informed the policy approach now set out in the Local Plan.	(LP300-7, LP284-17, LP270-1)
23	Headline rent of PBSA scheme may appear high when compared to HMO but it includes all bills, wi-fi, laundry service, 24/7 management and access to high-quality well-maintained amenity spaces which are all excluded in the rent for an HMO	Comments noted	(LP270-1)

	Respondents comments	MCC Response	Responder ID
	PROPOSED AMENDMENTS TO POLICY H5		
24	Policy should replicate the Core Strategy policy by deleting the first criteria and replacing with “ Sites should be close proximity to the University campuses or to a high frequency public transport route which passes this area ”	Comment noted. No change proposed to the plan. The policy has been worded as a result of the application of the previous Core Strategy policy and changes necessitated by that use.	(LP352-2)
25	Object to the current wording in the Draft Local Plan, that PBSA will be refused if it will "put pressure on existing neighbourhood services to the detriment of existing residents." PBSA can put a strain on the quality of life for local people without actually putting any pressure on neighbourhood services, eg, loud street noise as students come home in the early hours, lack of diversity in local shops, large blocks being built adjacent to small houses often blocking light,etc., and suggest new wording to "Student accommodation should closely integrate with existing neighbourhoods in a positive way without increasing pressure on existing neighbourhood services or causing detriment to existing residents. "	No change proposed to the plan. The plan should be read as a whole and in particular policies SP2 and DM1 which apply to all developments to ensure community concerns are considered in planning proposals.	(LP393-8, LP388-4, LP379-16)
26	Need to include a percentage of accessible accommodation for disabled students.	Comment noted. This is a matter for the detailed design stage and policies in the plan (e.g. SP2 and DM1) will have an influence on such matters.	(LP385-21, LP381-5, LP267-17)
27	Suggested changes to wording to reflect the social model of disability.	Comments noted.	(LP385-21)
28	Opportunity to reference other policies in the plan on urban green factor and biodiversity; should consider targets for green walls and roofs	No change proposed to the plan. The plan should be read as a whole. Relevant policies do not need to be referenced/duplicated.	(LP28-26)

	Respondents comments	MCC Response	Responder ID
29	UoM want to see provision of clusters encouraged through the policy alongside sufficient shared kitchen and social spaces as their research indicates that this leads to a more positive student experience	Comment noted. This is a matter for the detailed design stage and policies in the plan (e.g. SP2 and DM1) will have an influence on such matters.	(LP20-6)
30	Policy requirement to demonstrate a positive regeneration benefit could be a major blocker to any PBSA development in the city. The reference to 'positive regeneration impact' needs to be more specific and measurable. This reference should be removed and the policy worded to support PBSA proposals where they meet the requirements of the policy.	No change proposed to the plan. It is considered important that PBSA schemes consider how the scheme can contribute to wider regeneration objectives.	(LP20-6)
31	Any new development in an existing neighbourhood will potentially cause pressure on existing services and could therefore be perceived as having a detrimental impact on existing residents. The policy should be reworded to outline that any pressure on local services or communities should be managed by proposals either through mitigation or S106 obligations. This section of the policy should be removed and reworded as follows; "Proposals should provide an assessment of the local services required by students and how these will be provided for by the proposals either by on site mitigation or S106 obligations" .	No change proposed to the plan. The plan should be read as a whole and in particular Policy DC1 which specifically deals with developer contributions.	(LP20-6)
32	Sport England would like the policy to reference their Active Design guidance seek the inclusion of the need for new/improved sports facilities as required so that the plan is consistent with NPPF para 96	No change proposed to the plan. It is not considered appropriate to include guidance produced by 3 rd parties. Policy SI1 covers the need to consider existing/new sports facilities as part of development proposals. The plan should be read as a whole.	(LP9-36)

	Respondents comments	MCC Response	Responder ID
33	Policy needs to be strengthened to deal with potential loss of sports facilities in line with NPPF104	No change proposed to the plan This issue is dealt with in Policy SI1	(LP9-36)
34	Policy sets out that 'priority/preference' will be given to schemes developed in partnership with universities/City Council. Further detail is required about how this will be applied in practice when individual applications are being determined	This is a matter that will be dealt with on a case-by-case basis involving appropriate stakeholders to understand the circumstances of an individual proposal.	(LP270-1)
	OTHER		
35	Site put forward for circa 750 beds in central Manchester close to UoM and MMU	Noted.	(LP285-9)

Question No 27 - Self-build and custom housebuilding

Do you agree with this policy? Yes (5) In Part (1) No (0)

Yes (LP385-22, LP321-27, LP309-27, LP267-18, LP9-37)

In part (LP28-17)

	Respondents comments	MCC Response	Respondent ID
	Support		
1	Agree with policy	Support noted.	LP309-27, LP321-27, LP349-5
	Self-build and Custom-built housebuilding (SB&CBH)		
2	Policy in relation to provision SB&CBH should be separated from consideration of both CLH (see Section B) and development of 'small sites' in general	Change agreed. Policy heading has been amended to 'Self-build and custom housebuilding and Community-led housing '	LP392-1
3	It is unlikely that the proposed wording of policy H6 will be sufficient to deliver the step-change in delivery of SB&CBH required in order to meet the Councils duties under the Act.	Change agreed. Wording strengthened by adding: 'The Council supports Self-build and custom housebuilding schemes that help to create a sense of place and relate to the wider context in line with Policy D1 Design Principles The Council supports well designed community-led housing projects where the benefits to the community are clearly defined and it can be	LP392-1

	Respondents comments	MCC Response	Respondent ID
		demonstrated that consideration has been given to how those benefits can be protected over time.'	
4	Policy should be revised to include: a commitment to ensure sufficient plots are permissioned to meet the needs of those on the register; explore disposal of Council sites exclusively for SB&CBH; explore allocation of site for SB&CBH; and require a proportion of specified sites to comprise SB&CBH plots (eg other LAs proposing 5% of sites with over 100 units).	Change agreed. Text now includes the following: 'The Council is required to keep a register of individuals and groups wishing to self-build or custom build their own homes. The Council will support schemes that assist in meeting the demand demonstrated by the register.' However, the Council's priority remains the provision of affordable housing, particularly social housing so will not be requiring a proportion of each development to be SB&CBH.	LP392-1
	Community-led Housing (CLH)		
5	Further detail should be provided on how the Council intends to support, fund, and deliver community-led housing schemes.	Funding and delivery of this type of scheme is beyond the scope of the Local Plan.	LP278-5, LP392-1
	Small sites		
6	Welcome Project 500 programme disposing of small council-owned sites to HAs to deliver mixed-tenure homes but some of these sites should be made available for CLH.	The Council's priority remains provision of affordable housing.	LP392-1
	Empty Properties		
7	No policy or strategy to bring empty properties back into use for social rent.	This is outside the scope of the Local Plan, however the Council has published its Empty Homes Strategy 2026-2032 which aims to increase the supply of housing available to reduce homelessness.	LP392-1
8	Should be plan to refit houses, factories, shops etc	The Council has a programme to deliver affordable housing and to use empty homes. The Council	LP349-5

	Respondents comments	MCC Response	Respondent ID
		would support the conversion of buildings to homes where this is appropriate.	
	Other		
9	Just mentioning support not enough		LP349-5
10	UUW requests the following additional wording is included in this policy: • include water efficiency measures in accordance with optional standard of Part G of Building Regulations; and • incorporate sustainable drainage systems. Applicants must prioritise multi-functional systems which are integrated with the landscaping of a site.	No change proposed to the plan. Further detail will be provided at the planning application stage to ensure this matter is dealt with in a timely comprehensive way. A change has been made to Policy EN8 that includes details on water efficiency.	LP386-18
11	Where possible, projects should be accessible for disabled people	Comment noted. Accessible housing is covered in Policy H4 (which has now become Policy H3) and Policy DM1	LP385-22
12	Land is wasted building detached houses. More terraced and high rise would reduce bills and emissions and allow for more green space	PfE policy JP-H4 sets minimum density requirements.	LP349-5
13	The policy should be amended to include compliance with conservation area planning controls for self-built and custom housing	No change proposed to the plan. The plan should be read as a whole and requirements for developments within conservation areas are covered in Policy D4	LP297-8
14	The policy is an opportunity to reference co-housing and intergenerational schemes	No change proposed to the plan. Policy H7 refers to new residential development contributing to creating mixed communities.	LP28-27
15	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.	Sport England's Active Design guidance covers a range of principles of wider relevance than self-build and custom housing. Many of these principles are already picked up under other policies such as EN1	LP9-37

	Respondents comments	MCC Response	Respondent ID
		strategic Green and Blue Infrastructure and T1 Transport Principles	

Question No 28 - Housing Design

Do you agree with this policy? Yes (9) In Part (2) No (0)

Yes (LP321-28, LP318-16, LP309-28, LP299-4, LP292-14, LP267-19, LP28-28, LP16-1, LP9-41)

In part (LP315-11, LP27-18)

	Respondents comments	MCC Response	Respondent ID
	Support		
1	General support	Support noted.	LP16-1, LP264-6, LP290-8
2	Historic England welcome the requirement for new residential development to contribute to the character of the area, having regard to Policy D2 Character Areas	Support noted	LP318-16
3	Agree all surfaces should be permeable	Support noted	LP349-3, LP404-10
4	National Highways supports provision of bicycle infrastructure/parking as it may encourage modal shift away from private vehicles and reduce SRN pressure	Support noted	LP321-28
5	It's good to see these considerations for lifetime use built in. Also the ideas about shared areas which can of course help to accommodate nature	Support noted	LP299-4
6	Support aim to create mixed communities; requirements for outdoor amenity space; accessibility and environmental sustainability	Support noted	LP278-19
	Outside space		

	Respondents comments	MCC Response	Respondent ID
7	Policy should stipulate that maximum permeability and green field run off rates should apply to front gardens	No change proposed to the plan. Policy EN9 sets out runoff rates for developments. Applying these specifically to front gardens if no other development is involved would be beyond the scope of the Local Plan.	LP404-10
8	Householders and developers, especially in conservation areas, minimise the hard landscape in front gardens given over to parking	No change proposed to the plan. The Policy requires permeable material to be used for outside surfaces.	LP404-10
9	Balconies should be strong enough to accommodate plants and greenery	No change proposed to the plan. Comment noted and a matter of detailed design.	LP404-10
10	Would like new schemes to be built around a communal green space with some communal facilities	No change proposed to the plan. It is not appropriate to prescribe the design and layout of new schemes, however other policies in this plan and Places for Everyone require design to be inclusive, sustainable and accessible.	LP349-3
11	Adequate space should be provided for new housing including space between houses	No change proposed to the plan. Comment noted and Policies SP2 and DM1 will influence layout design.	LP344-15
12	If usable amenity space of an appropriate quality is available nearby, there should be no specific requirement to provide further space on site or as a component of the scheme	No change proposed to the plan. All new residential development schemes should consider providing access to amenity space as close to the housing as possible.	LP264-6
13	Minimum density standards may conflict with the need for adequate outdoor space and privacy	No change proposed to the plan. Schemes should be designed to ensure that there is no conflict.	LP278-19
14	Add an additional bullet point to ensure residential development is designed in accordance with the principles of Active Design	No change proposed to the plan. This is covered by other policies in the plan, for example Policy SI1 and Policy D1. Where other	LP277-8

	Respondents comments	MCC Response	Respondent ID
		policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	
15	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	No change proposed to the plan. It is not considered appropriate to include guidance produced by 3 rd parties.	LP9-41
16	Recommend that the Local Plan sets out clear minimum standards for both private and communal amenity provision	No change proposed to the plan. It is not appropriate to prescribe the design and layout of new schemes, however other policies in this plan and Places for Everyone require design to be inclusive, sustainable and accessible.	LP16-1
17	Request greater clarity on the requirements around SuDS (Sustainable Drainage Systems) and the integration of blue and green infrastructure	No change proposed to the plan. Policy requirements for SuDS are set out in Places for Everyone (JP-S4) and Policy EN9. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP16-1
	Parking		
18	All development outside of the CC should provide parking	No change proposed to the plan. Policy T2 addresses parking provision across the city. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP397-1
19	Providing safe, secure and accessible cycle parking for all new housing developments should be explicitly noted	No change proposed to the plan. Policy T2 addresses cycle parking provision across the city. Where other policies in the Local	LP365-9

	Respondents comments	MCC Response	Respondent ID
		Plan deal with these matters they are not repeated as the plan should be read as a whole.	
20	Encourage the Local Plan to adopt 'car-free' development, particularly in the regional centre and near public transport hubs and therefore propose removing the blanket requirement for proposals to make provision for parking cars.	No change proposed to the plan. Policy T2 addresses parking provision across the city, including proposals to minimise this within the City Centre. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP27-18, LP290-8
21	Policy should distinguish between cycle parking (often for short term parking) and longer term bike storage and on-street bike storage	No change proposed to the plan. It is considered the policy is sufficiently flexible to address both short- and long-term cycle parking.	LP290-8
22	Car parking should not be required where it can be demonstrated that a site is in a sustainable location or genuinely accessible by alternative modes of transport.	No change proposed to the plan. Policy T2 addresses the wider issue of parking provision across the city. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP264-6
23	Seek further detail on the minimum standards for car parking and cycle storage provision	Policy T2 provides the approach to car parking and cycle standards.	LP16-1
	Buildings		
24	Non reflective glass should be used where bird collisions with windows can take place.	No change proposed to the plan. Policies SP2 and M1 provide sufficient policy detail covering the effects on natural resources and biodiversity.	LP404-10
25	Policy should mention ' will incorporate shared spaces and communal areas ' where a density / number threshold is met	No change proposed to the plan. Policy explicitly includes high density development within the requirement to provide appropriate, usable outdoor space.	LP296-12, LP308-28, LP379-17, LP383-4

	Respondents comments	MCC Response	Respondent ID
26	Planning guidance should include the stipulation that swift bricks (preferably) or boxes “...should be provided in all new developments (residential and commercial) across the city of 5m or greater in height to the eaves.”	No change proposed to the plan. Policy EN4 addresses the incorporation of swift bricks within new development. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP356-3
27	Front doors should be larger to accommodate taller people	No change proposed to the plan.	LP344-15
28	Buildings should be reused and building materials recycled	No change proposed to the plan. Policy ZC1 address sustainable construction including reuse of buildings and materials where possible. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP344-15
	Health		
29	The policy should include the following principles on health: that ‘ all new homes should be safe in relation to the risk of fire; all new homes should have access to natural light; all new homes should demonstrate how they will be resilient to a changing climate; all new homes should be free from unacceptable and intrusive noise and light pollution; all new homes should not contribute to unsafe or illegal levels of indoor or ambient air pollution and must be built to minimise and where possible eliminate, the harmful impacts of air pollution on human health and the environment; and all new homes should be	No change proposed to the plan. Places for Everyone Policy JP-P1 addresses these issues. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP296-12, LP308-28, P379-17, LP383-4

	Respondents comments	MCC Response	Respondent ID
	designed to provide year-round thermal comfort for inhabitants’.		
	Low/zero carbon		
30	Make sure all new homes are zero-carbon-ready and energy efficient to keep bills low.	No change proposed to plan. Policy ZC1 addresses this issue. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP384-4
31	The policy should also cross reference to policy ZC1 and/or ZC2	Where other policies in the Local Plan deal with these matters it should not be necessary to cross reference as the plan should be read as a whole.	LP261-30, LP267-19, LP292-14, LP379-17, LP383-4
	Viability		
32	Noted that the policy includes list of requirements but how can these be supported whilst also achieving required housing densities	No change proposed to plan. Comments noted	LP269-10
33	Request that flexibility is applied in application of these design requirements, as there can often be competing demands especially within the ground floor of high-density developments	No change proposed to plan. Comments noted	LP16-1
	Density		
34	The density standards contained within PfE Policy JP-H4 allow for flexibility and for schemes to ‘have regard to’ the densities shown in the tables. In contrast, Policy H7 is much blunter in requiring adherence to the densities found in PfE Policy JP-H4. Given that this was never the intention of the PfE policy, the Council needs to ensure a similar approach to flexibility in densities is provided.	No change proposed to plan. The Policy requires that development meets the requirements of Places for Everyone Policy JP-H4. It does not change the wording or intent of the PfE policy.	LP269-10
	Other		

	Respondents comments	MCC Response	Respondent ID
35	Policy H7 should mention ' will protect and incorporate existing communities as part of their design '	No change proposed to plan. The Policy requires that proposals for new residential development will contribute to the character of the local area.	LP308-28, LP379-17, LP383-4
36	The agent of change principle must be embedded across all relevant policy areas, with the duty placed on applicants, not established industry, to manage and mitigate impacts	No change proposed to plan. Policy DM1 Development Management is being amended to take account of agent of change.	LP382-10
37	Suggest ' and EN2 Waterways ' is added to second bullet	No change proposed to plan. Policy D2 already references river valleys and canals.	LP315-11
38	Conservation Area's should be referenced in this policy. Housing design in Conservation areas should meet the special architectural and historic character of conservation areas.	No change proposed to plan. Policy D4 addresses this issue. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP297-9
39	Link Design to Affordability: Ensure that high design standards do not inflate costs, making homes inaccessible to low-income households	No change proposed to plan. Comments noted	LP278-19
40	Strengthen Enforcement: Remove "get-out clauses" for developers and require compliance with affordable housing targets.	No change proposed to plan. National planning policy requires that policies in local plans are viable and recognises that in some circumstances, not all policy requirements will be viable.	LP278-19
41	Mandate Affordable Housing Quotas: Include a clear percentage for social rent within new developments.	No change proposed to the plan. Targets set based on HNA	LP278-19
42	Introduce Social Value Metrics: Adopt post-occupancy evaluation and social sustainability	No change proposed to the plan.	LP278-19

	Respondents comments	MCC Response	Respondent ID
	indicators (e.g., community cohesion, health outcomes).	The Monitoring Framework that accompanies the Local Plan sets out the approach to how policies will be monitored once the plan is adopted	

Question No 29 - Housing in Multiple Occupation

Do you agree with this policy? Yes (4) In Part (7) No (0)

Yes (LP385-23, LP321-29, LP309-29, LP28-29)

In part (LP381-6, LP304-9, LP267-20, LP261-14, LP27-29, LP26-2, LP14-4)

	Respondents comments	MCC Response	Respondent ID
	General Support		
1	Welcome the presumption to retain family homes and the need for planning consent	Support noted	LP267-20, LP261-14, LP267-20, LP26-2, LP14-4, LP293-1, LP381-6, LP393-1
2	Welcome reference to prevention of harm to residential amenity	Support noted	LP26-2, LP261-14
	Over-Concentration		
3	There should be no more HMOs in Moss Side	The policy states that HMOs will not be permitted where it will result in the loss of a family home. This applies across the City.	LP388-7, LP308-29, LP393-1
4	The three criteria set out for permitting new HMO development in the Local Plan are likely to only make the situation worse in an area like Fallowfield where the current 'character' is often reduced to a student area	Change agreed. The first paragraph states that HMOs will not be permitted where it is suitable for a family or needed by a care provider. This is the Council's initial position on any HMO applications. However, there needs to be some flexibility for individual circumstances to be taken into consideration. To clarify the meaning of the final bullet point, ' or cause further detriment to ' has	LP30-3

	Respondents comments	MCC Response	Respondent ID
		been added between 'harm' and 'the character of the area.'	
5	Without strong protections, developers are likely to argue that already destabilised areas will not be adversely affected, encouraging concentrated student populations and transience rather than long-term stability	Change agreed. To clarify the meaning of the final bullet point ' or cause further detriment to ' has been added between 'harm' and 'the character of the area.'	LP293-1
6	There is no need/demand for HMOs	Comment noted	LP297-10
	Restrictions on Change of Use		
7	In neighbourhoods with a concentration of transient tenants and an above average use of premises by care providers, change of use of a family house to C4 or its use by a care provider should not be permitted.	The impact of another HMO in an area of high concentration would be considered when determining whether the proposal would materially harm the character of the area. The criteria have been clarified by adding ' or cause further detriment to ' has been added between 'harm' and 'the character of the area.'	LP297-10, LP351-1
8	Allowing charities or social housing providers to convert family homes into HMOs would still result in the loss of much-needed housing and further destabilise the community. Request that the Local Plan explicitly prohibits HMO conversions by any provider where a property is suitable for a family.	Change agreed. The policy doesn't allow care providers to develop HMOs. It does not permit residential institutions to be converted to HMOs. To clarify the policy, footnote 1 now reads 'Use Class C3 dwelling house or C2 Residential Institution ' and the first sentence now reads 'In order to protect family homes across the City, change of use of a dwelling ¹ to a House in Multiple Occupation (HMO) ² will not be permitted where this would result in either the loss of a home which is suitable for a family or loss of accommodation which is needed	LP293-1

	Respondents comments	MCC Response	Respondent ID
		by a care provider such as a charity or social housing provider.	
9	Need to clarify policy with examples being given of 'loss of a home which is suitable for a family', 'needed by a care provider such as a charity or social housing provider' and 'reasonable demand for the existing use'.	Change agreed. The following text has been added under the policy ' For the purposes of the policy, housing suitable for a family or needed by a care provider is a dwelling with 3 or more bedrooms, and no reasonable demand would be demonstrated by a period of at least six months on the market at a reasonable price or rental level or other compelling market evidence. '	LP256-1, LP293-1, LP304-9, LP308-29, LP381-6, LP388-7, LP393-1
10	Policy is unclear and seems to give loophole to landlords to rent to charities/social housing providers	Change agreed. The policy doesn't allow care providers to develop HMOs. It does not permit residential institutions to be converted to HMOs. To clarify the policy, footnote 1 now reads 'Use Class C3 dwelling house or C2 Residential Institution ' and the first sentence now reads 'In order to protect family homes across the City, change of use of a dwelling ¹ to a House in Multiple Occupation (HMO) ² will not be permitted where this would result in either the loss of a home which is suitable for a family or loss of accommodation which is needed by a care provider such as a charity or social housing provider.	LP256-1, LP293-1
	Limits, Thresholds, and Controls		
11	Would like to see a stated limit on the proportion of HMOs in a particular area (rather like the hot food takeaway.	The impact of another HMO in an area of high concentration would be considered when determining whether the proposal would materially harm the character of the area. The criteria have	LP267-20, LP256-1, LP297-10, LP388-7, LP393-1

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		been clarified by adding 'or cause further detriment to' has been added between 'harm' and 'the character of the area.'	
12	The Council should take a much stronger approach through policy or Article 4 Directions. In Fallowfield and other areas with high concentration of HMOs, the Article 4 Direction should prevent further extensions or intensification of HMOs	An Article 4 Direction can only remove a permitted development right. There is an Article 4 Direction in place across the whole city that ensures all HMO developments are subject to planning permission. Without the Article 4, HMO development could be classed as permitted development and would not require full planning permission.	LP293-1, LP304-9, LP388-7, LP396-1
13	Policy should restrict increasing occupancy through permitted development rights	Permitted Development Rights to convert a dwelling into an HMO have been removed across Manchester by the Article 4 Direction.	LP393-1
14	Call for enforcement of unauthorised/unpermissioned HMOs	Enforcement action is beyond the scope of the Local Plan policies.	LP308-29, LP381-6, LP388-1
15	Consideration should be made in the plan to tighten and expand current licensing districts for HMO	Licensing is beyond the scope of the Local Plan	LP381-6
16	Where large numbers of HMOs are proposed, it should be demonstrated that there are no undue impacts on the local network and potentially the SRN	Comment noted	LP321-29
17	Should only allow where they lead to a reduction in carbon emissions	The Local Plan should be read as a whole, and all development will need to be in line with the Net Zero Carbon and Resilience policies.	LP27-29
18	MCC should ensure that there is sufficient HMO provision to meet demand and keep rents affordable for young people moving on from homelessness who	This policy has been developed to be flexible to support proposals where it can be demonstrated there is a specific need for an HMO.	LP14-4, LP381-6

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	are often only able to claim Shared Accommodation Rate (SAR)		
	Short Term Lets (STLs)		
19	The Local Plan should include policy that can adapt to restrict short term lets when new legislation is introduced	It is acknowledged that short term lets can have an impact on availability of housing, however they also play a valuable role in providing accommodation options for visitors to the City. This use is difficult to control using current planning legislation; however Government has indicated an intention to introduce a new use class specifically for short term lets and potentially permitted development rights. If this is introduced, this would allow local authorities more control over distribution/concentration.	LP388-1, LP384-1, LP393-1
20	Include covenants on new development to prevent use as STL	See above. This is currently beyond the scope of the Local Plan	LP388-7, LP393-1

