

# Integrated Appraisal of the Manchester Local Plan

Interim IA Report

Manchester City Council

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## Quality information

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# 1. Introduction

## 1.1 Background

- 1.1.1 AECOM has been commissioned by Manchester City Council to lead on an Integrated Appraisal (IA) in support of the new Local Plan.
- 1.1.2 IA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IA involves undertaking the legally required Sustainability Appraisal (SA) process<sup>1</sup>.
- 1.1.3 IA also includes: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to health impacts and promote the reduction of health inequality.

## 1.2 IA explained

- 1.2.1 It is a requirement that IA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.2.2 In-line with the Regulations, a report (known as the IA Report) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.3 More specifically, the IA Report must answer the following three questions -
  - What has Plan-making / IA involved up to this point?
    - including with regards to consideration of 'reasonable alternatives'
  - What are the IA findings at this stage?
    - i.e., in relation to the draft plan
  - What are next steps?

## 1.3 This interim IA Report

- 1.3.1 Currently the Council is consulting on a draft plan. There is no strict requirement for IA work at this stage in the plan-making process; nonetheless, this 'Interim' IA Report is produced with the intention of informing plan-making, and presenting stakeholders with insights in respect of the sustainability implications of the draft Plan.

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<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of IA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an IA Report is published for consultation alongside the 'Proposed Submission' plan document.

## 2. What is the plan seeking to achieve?

### 2.1 Why a new Local Plan?

- 2.1.1 There have been significant changes in policy, demographics and priorities since the Manchester Core Strategy was adopted in 2012.
- 2.1.2 Notwithstanding the length of time since a land-use strategy was set for Manchester, there have been key changes to national planning policy, and significant work undertaken resulting in the adoption of a Joint Development Plan for nine authorities across Greater Manchester known as the Places for Everyone Plan (PfE).
- 2.1.3 Manchester City Council is developing a new Local Plan to respond to these changes, and this will form a key part of the overall 'development plan' for Manchester.
- 2.1.4 The "development plan" for Manchester currently comprises the adopted Places for Everyone (PfE) Joint Local Plan; Core Strategy (2012), saved Unitary Development Plan (UDP) policies, the Greater Manchester Joint Minerals Plan, and the Greater Manchester Joint Waste Plan. The revised local plan will replace the Core Strategy and saved UDP policies. It will then consist of the newly adopted Manchester Local Plan; PfE; and minerals and waste plans.
- 2.1.5 Key challenges that need to be addressed in the Local Plan are as follows:
- There is a need to align with the NPPF and recent government planning reforms.
  - The PfE sets an ambitious plan for significant growth in Manchester, and there is a need to support this strategy with a local plan.
  - Manchester has committed to becoming net zero carbon by 2038, which requires a proactive approach to planning.

## 3. What is the scope of the IA?

### 3.1 Introduction

- 3.1.1 The aim here is to introduce the reader to the scope of the IA, i.e., the sustainability objectives that should be a focus of (and provide a broad methodological framework for) the integrated appraisal. Further information on the scope of the IA - i.e., a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in the IA Scoping Report.
- 3.1.2 The SEA Regulations require that "When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the IA scope], the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England and Natural England. A Scoping Report was sent to the statutory consultees for comment in July 2021, as well as being made available for wider consultation on the Council's website. A range of comments were received, and these have been addressed whilst preparing a focused update to the scoping report (October 2023).

### 3.2 IA objectives

- 3.2.1 The key issues identified through the scoping process led to the identification of a series of sustainability objectives and supporting appraisal criteria. Together, this forms an 'integrated appraisal framework', which forms the basis of the appraisal methodology.
- 3.2.2 A first draft IA Framework was presented in the first iteration of the Scoping Report (2021). This was subsequently consulted upon with the statutory consultees.
- 3.2.3 The IA framework was reviewed to reflect focused updates to the scoping, with several important factors being considered:
- Comments made through consultation on the first draft of the IA Scoping Report in 2021.
  - New key issues identified through the focused scoping update exercise.
  - Suggestions made by AECOM upon reviewing the first draft IA Framework and undertaking scoping updates.
- 3.2.4 The updated IA Framework is presented in Table 3.1 overleaf. Taken together, the sustainability objectives (presented in Table 3.1) and supporting criteria provide a methodological 'framework' for appraisal.

**Table 3.1 IA Topics and Objectives**

<b>IA topic</b>	<b>IA objective</b>
<b>Natural environment</b> To protect and enhance the natural environment, including biodiversity (habitats and species), geodiversity and soils.	Maintain and where possible enhance biodiversity and geodiversity. Provide opportunities to create and improve habitats, achieving net gains in biodiversity? Ensure that new development does not negatively impact on the condition of designated habitats and other important features such as ancient and veteran trees, urban parks and water environments? Protect the best and most versatile agricultural land / soil resources from inappropriate development? Reflect the aims of the local nature recovery strategy by seeking to increase the size of habitats, strengthening linkages between areas, reducing pressures and managing land better. Enhance public access to the natural environment to promote wellbeing, whilst managing potential impacts.
<b>Land resources</b> Ensure the efficient use of land resources and reduce the environmental and health impacts of contaminated land.	Support reductions in land contamination through the remediation and reuse of previously developed land? Support the development of previously developed land and other sustainable locations? Encourage the redevelopment of derelict land, properties, buildings and infrastructure, returning them to appropriate uses? Protect mineral deposits including peat?
<b>Housing</b> Promote the sustainable growth of the city's population.	Ensure an appropriate quantity and quality of housing land to meet the identified local need for market and affordable housing? Ensure an appropriate mix of types, tenures and sizes of properties in relation to the respective levels of local need including for vulnerable and disadvantaged groups and those with protected characteristics?
<b>Community</b> Provide safe, attractive, inclusive neighbourhoods, which include, or are well connected to centres and other amenities.	Ensure housing land is well-connected with employment land, centres and green space or co-located where appropriate? Promote good quality building and public realm design so that they are safe, secure and welcoming, and reduce levels of crime? Ensure that land instability and other hazards are addressed in developments?

IA topic	IA objective
<b>Sustainable growth</b> Promote the sustainable growth of the city's economy, accommodating indigenous and inward investment.	<p>Ensure an appropriate quantity and quality of employment land to meet the identified and future needs in locations that are well-connected and well-served by infrastructure?</p> <p>Support education and training to provide a suitable labour force for future growth?</p> <p>Ensure that there is sufficient coverage and capacity of telecommunications and other utilities to support growth and development?</p>
<b>Equality</b> Reduce poverty and social deprivation and secure economic inclusion.	<p>Promote opportunity for all and reduce exclusion in the resident population by improving qualifications, skills and thereby employment prospects?</p> <p>Ensure equality of opportunity and equal access to facilities / infrastructure for all?</p> <p>Reduce the proportion of people living in deprivation?</p> <p>Ensure that the needs of different places in the borough are equally addressed?</p> <p>Ensure that groups with 'protected characteristics' are not disproportionately affected in a negative way?</p> <p>Embrace diversity and support the infrastructure needs of different communities / people?</p>
<b>Health and Wellbeing</b> Improve the health and wellbeing of the population and reduce health inequalities.	<p>Support healthy lifestyles and support improvements in determinants of health?</p> <p>Prioritise policies and interventions that both reduce health inequalities by improving active travel, providing good quality open and green spaces and the energy efficiency of housing?</p> <p>Promote access to recreational opportunities, both formal and informal?</p> <p>Promote and improve social infrastructure and access to community services and facilities?</p> <p>Improve access to the historic and natural environment.</p> <p>Ensure equitable access to health facilities in terms of proximity and quality of service?</p>
<b>Flooding</b> Reduce the risk of flooding to people and property.	<p>Minimise the probability and consequences of flooding?</p> <p>Restrict the development of property in areas of flood risk' and ensure that development does not increase flood risk due to increased run-off rates?</p>



IA topic	IA objective
	<p>Ensure development is appropriately future proofed, including the design and placement of buildings, to accommodate future levels of flood risk including from climate change?</p> <p>Support the use of sustainable drainage systems that encourage nature-based solutions.</p>
<p><b>Water quality</b></p> <p>Protect and improve the quality of, availability and sustainable access to water resources.</p>	<p>Maintain and where possible enhance the quality of water resources, water bodies and the wider environment?</p> <p>Ensure compliance with the Water Framework Directive?</p> <p>Promote management practices that will protect surface and groundwater from pollution?</p> <p>Promote measures to encourage the economical consumption of water?</p> <p>Promote sustainable access to water environments including the River Mersey Valley and a range of other waterside parks and parklets?</p>
<p><b>Air Quality</b></p> <p>Improve air quality and reduce the impact on human health.</p>	<p>Improve air quality within the district particularly in the AQMA and other areas sensitive to pollution?</p> <p>Promote clean efficient, transport networks and modes to support the sustainable growth of the city?</p> <p>Reduce people's exposure to poor air quality?</p>
<p><b>Climate Change</b></p> <p>Reduce greenhouse gas emissions and improve resilience to climate change.</p>	<p>Minimise greenhouse gas emissions attributable to Manchester?</p> <p>Contribute to wider initiatives to reduce greenhouse gas emissions more generally?</p> <p>Reduce expected impacts of climate change, including by making new developments resilient and extending green and blue infrastructure?</p> <p>Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?</p>
<p><b>Travel and transport</b></p> <p>Reduce the need to travel and promote sustainable and active modes of transport.</p>	<p>Maintain and, where needed, enhance the transport network?</p> <p>Ensure that the transport network can support and enable the anticipated scale and spatial distribution of development?</p> <p>Reduce the need to travel and promote efficient patterns of movement by linking homes with jobs and other facilities?</p> <p>Promote an accessible, safe, sustainable and connected public transport network that reduces reliance on private motor vehicles?</p>

IA topic	IA objective
<b>Use of Resources</b>	Support the use of sustainable and active modes of transport, including promoting cycling and walking for shorter journeys?
Protect natural finite resources, minimise waste and promote the efficient use of energy and materials.	<p>Minimise waste generation and promote the sustainable management of waste?</p> <p>Promote re-use, and improve recycling and recovery rates?</p> <p>Encourage reduction in energy use and increased energy efficiency?</p> <p>Encourage the development of low carbon and renewable energy facilities, including as part of conventional developments?</p> <p>Support the move away from conventional fuel vehicles?</p> <p>Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?</p> <p>Preserve peat resources and recognise their value for biodiversity, water, and carbon sequestration.</p>
<b>Heritage</b> Protect, conserve and enhance the historic environment, reflecting Manchester's industrial, cultural and natural heritage.	<p>Protect, conserve and enhance the historic environment, including heritage assets (designated assets and locally listed assets) and their setting, and recognise the potential for (as-yet unidentified / unrecorded) assets and archaeology?</p> <p>Promote appropriate management of the historic environment, based on local circumstances and individual characteristics, to ensure they remain in appropriate use and are accessible to communities?</p> <p>Improve townscape and the built environment through the promotion of high-quality design, by the appropriate placement of buildings, and enhancements to green and blue infrastructure and the public realm?</p> <p>Improve the quality and character of landscapes, open spaces, and the public realm, recognising the importance of the natural environment to the historic environment?</p>

## **Part 1: What has plan-making involved**

## **4. Introduction (to Part 1)**

### **4.1 Background**

- 4.1.1 This section of the report sets out the work undertaken by the Council to date in terms of the preparation of the Manchester Local Plan.
- 4.1.2 The Council have been developing and preparing the evidence base to inform the new Local Plan and are looking to continue engagement with local communities and businesses.

### **4.2 Manchester Local Plan Issues Consultation**

- 4.2.1 The Issues stage was consulted on in 2020 covering key matters and how they should be addressed in the new local plan. At that time, work was also focussed on the Greater Manchester Spatial Framework (GMSF). As a result of the withdrawal of Stockport Council, the nine remaining local authorities produced an updated Joint Local Plan, Places for Everyone (PfE). PfE was adopted by the nine individual local authorities in March 2024.
- 4.2.2 The Issues Consultation covered a range of topics to help identify priority policy areas for the draft Local Plan. Feedback from the consultation was taken into consideration when moving towards the preparation of a draft Local Plan, including the development of a robust evidence base.

### **4.3 Exploring and appraising plan options**

- 4.3.1 To help inform the draft Local Plan, the Council has built upon the Issues consultation stage by exploring options in relation to a range of key issues. This process (and the outcomes) is discussed in Section 5 overleaf.

# 5. Considering options

## 5.1 Introduction

- 5.1.1 There is a need for plan-makers to determine what elements of the plan present strategic choices and where there may be different options to address key issues. The onus is also on the plan-makers to determine what constitutes a reasonable alternative and such matters should be explored through the Integrated Appraisal.
- 5.1.2 There is a need to be proportionate rather than appraising alternatives for every aspect of the Plan. In determining what constitutes a reasonable alternative, the following factors have been considered.
- Evidence documents which suggest action needs to be taken in the Plan to address key issues.
  - Suggestions and feedback from stakeholders through consultation.
  - Whether policies are strategic in nature.
  - Whether there are likely to be significant effects.
- 5.1.3 In some instances, it is acceptable to conclude that there are no reasonable alternatives in respect of certain plan issues. However, it is important to present a short discussion of the rationale for these decisions.

## 5.2 Strategic issues

### Overall housing provision

- 5.2.1 The housing need for Manchester is established within the Places for Everyone Plan (PfE), which acts as a 'Local Plan Part 1' for the emerging Manchester Local Plan. The Places for Everyone Plan derives its housing figure using the standard methodology of the NPPF and NPPG (though this was before the 2024 updates).
- 5.2.2 The overall housing requirement for Manchester is set at 60,061 between 2022 and 2039, which is the largest housing target across the nine constituent local authorities of the PfE. This equates to 3,533 homes per annum, which is considered to be a challenging, but realistic target that reflects the demand for growth in Manchester.
- 5.2.3 The minimum housing figure calculated under the new proposed method for housing is 2,430 dwellings per annum, which is lower than the current target. However, the Council does not consider it reasonable to plan for this lower level of delivery given the recent adoption of PfE (March 2024). Furthermore, the transitional arrangements of the NPPF (with regards to plan making) are clear that if an Adopted Plan exists that sets out housing delivery (such as a joint plan), then the NPPF changes do not need to be applied.

- 5.2.4 The level of growth indicated through the Places for Everyone Plan is anticipated to bring forward high-density development within the city. This reflects the level of existing development and the relative lack of available sites on the periphery of the city that could accommodate housing growth. Additionally, higher density growth is anticipated to come forward in areas within proximity to existing services and facilities, or with good access to such infrastructure – to help ensure sustainable growth as far as possible. This is anticipated to impact upon the distribution of housing sizes across Manchester, though it is noted that high density development does not necessarily mean a focus on smaller housing units.
- 5.2.5 Given this, the Manchester Local Plan has a focus on where housing growth should come forward across the area as opposed to bringing forward additional growth on top of the existing requirement. Additional housing is not being pursued due to the potential impacts; 60,061 units is a large number and is already likely to impact upon housing need and supporting services and facilities. As such, it is concluded that there are no reasonable alternatives to explore in relation to the amount of housing.

### **Overall employment provision**

- 5.2.6 The Places for Everyone Plan seeks to deliver sustainable and inclusive growth, including through the provision of significant new employment opportunities. The Plan highlights that employment opportunities are unevenly dispersed across Greater Manchester, with the largest concentration focused within Manchester City Centre and adjoining areas, such as Salford Quays. This concentration collectively accounts for around 20% of all jobs in Greater Manchester. As such, a reduction in unemployment and employment inequalities is anticipated to have positive impacts for a number of key areas, including (but not limited to) health and wellbeing and economy. The focus of PfE on ensuring there is adequate development land to meet employment needs, and ensuring there is a diverse range of employment sites and premises, is anticipated to contribute towards this reduction.
- 5.2.7 The Manchester Local Plan identifies the Core Growth Area as covering the Manchester City Centre and extending through to Central Park; this area has a high concentration of employment space and serves as the economic hub of the city region. The Inner Areas that surround the Manchester city centre have access to employment opportunities within the City Centre and will benefit from major plans for Strangeways and North Manchester General Hospital. The Southern Areas have good access to employment opportunities within their boundaries, including industrial/business parks at Roundthorn and Sharston and Manchester Airport.
- 5.2.8 Given the Core Growth Area has the greatest concentration of existing economic assets, including (but not limited to) hospitals, universities and office, retail and leisure businesses, it is the most favourable location for inward investment. This also reflects the level of accessible economic and employment development in the area, which is anticipated to reduce the need to travel and will likely support public transportation. This is reflected in the strategic growth location policies of the Manchester Local Plan.

- 5.2.9 Furthermore, the Manchester Local Plan does not exclude further economic growth in the identified Inner Areas and Southern Areas of Manchester, but rather seeks to protect existing economic activity. This is likely to be achieved through protecting existing employment space and designating economic growth locations where appropriate – which are chosen for their concentration of businesses and jobs, and their investment levels.
- 5.2.10 Overall, no reasonable alternatives have been identified relating to the approach taken to employment levels and land in Manchester. This is due to the focus on protecting existing opportunities and infrastructure across the area.

### **Office provision**

- 5.2.11 The Places for Everyone Plan seeks to deliver sustainable and inclusive growth, including through the provision of significant new employment opportunities. This includes through protecting existing and providing additional office space and opportunities, especially in the Core Growth Area – which is the largest office market in the UK outside of London. The Manchester Local Plan recognises the importance of office space and indicates that approximately 1.9 million square metres of office space will be provided within the Core Growth Area, with an additional 27,000 square metres in the Inner Areas, and 145,000 square metres in the Southern Areas. It is anticipated that growth in these areas will be located sustainably; allowing for access via active and public transport opportunities, thus reducing the need to rely on private vehicles.
- 5.2.12 There is a strong focus on bringing forward additional space where there is a requirement for it, and where it would be most beneficial. Therefore, the Council consider that there are no reasonable alternatives relating to the approach taken to office space in Manchester.

### **Broad growth locations**

- 5.2.13 The NPPF identifies the issue of broad growth locations and allocations, as follows:
- “Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies”).*
- 5.2.14 The Places for Everyone Plan responds to this and focuses strategic growth in key locations across Greater Manchester, with a view to maximise potential, deliver inclusive growth, and improve infrastructure.
- 5.2.15 The Manchester Local Plan builds on the Core Growth Area, Inner Areas and Southern Area that are established in the Places for Everyone Plan.

- 5.2.16 It identifies primary locations that are expected to accommodate the majority of the required growth, development and supporting infrastructure over the plan period. By focusing on these areas, significant growth in housing and employment can be focused within the most sustainable locations at appropriate densities.
- 5.2.17 The identified strategic growth locations are the most sustainably located and can accommodate the identified need in Manchester in an appropriate manner. The scale of growth and proposed land uses within the growth locations have been influenced by a range of factors including land supply, committed developments, infrastructure, existing uses, constraints and opportunities. There are also long-term regeneration strategies and frameworks for key parts of Manchester which must be reflected in the Local Plan strategy. For example, there has been considerable progress and ongoing plans for development within City Centre Strategic Regeneration Frameworks, Neighbourhood Development Frameworks and Innovation and Employment Zones across Manchester in the last 15 years. This is all reflected within the proposed Local Plan strategy including the broad locations. The Council has explored whether there are other broad locations or different approaches to take within the locations but concluded that none are reasonable. For example:

*Central Park Strategic Employment Opportunity* - Central Park is a well-located sustainable site, 1.5 miles of the City Centre, with its own dedicated Metrolink stop. There are no other comparable locations suitable for the type of employment identified with plots ready for development. It offers opportunities for high quality jobs to surrounding communities achieving a key objective of the Local Plan to provide access to jobs and deliver inclusive growth which ensures all parts of our City and our residents share the benefits.

*North Manchester General Hospital* - there are no reasonable alternatives as this location involves specific types of development related to healthcare and the locations are essentially predetermined.

### **Gypsy and Travellers and Travelling Showpeople**

- 5.2.18 The Planning Policy for Traveller Sites states that local planning authorities should set pitch targets for gypsies and travellers, and plot targets for travelling showpeople, which address the likely permanent and transit site accommodation needs in their area, working collaboratively with neighbouring local planning authorities.
- 5.2.19 The evidence base that supports the Manchester Local Plan is included in three documents. The requirements for Gypsy and Travellers is set out in two of the documents – firstly a study focusing on Manchester (Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2022) which identified the need for 17 pitches up to 2037/38. This study has been updated via work covering Greater Manchester (Gypsy and Traveller Accommodation Assessment 2024) which identified a need for 18 pitches up to 2040/41.



- 5.2.20 The evidence base for Travelling Showpeople (Greater Manchester Gypsy and Traveller and Travelling Showperson Accommodation Assessment Update 2018) set out that there are were 73 plots for travelling showpeople across the city, located in Cheetham Hill and Lower Crumpsall. The study identified a need for an additional 56 plots up to 2035 / 36 in Manchester..
- 5.2.21 At this time, the Manchester Local Plan puts forward a criteria-based policy, which indicates the number of pitches and plots to accommodate gypsies, travellers and travelling showpeople. Work has been undertaken to establish the potential for sites to accommodate the Gypsy and Traveller and Travelling Showpeople communities respectively.
- 5.2.22 It is recommended that potential site options within Manchester should be identified and assessed for their suitability to accommodate gypsy and traveller and travelling showpeople communities. This will help to provide greater certainty that identified needs can be met, even in the absence of site allocations. This could be explored at the next stages of plan-making prior to the Plan being finalised for Submission.

### **Affordable housing**

- 5.2.23 Overall, Greater Manchester is considered to be a relatively affordable place to live compared to other parts of the UK. The importance of affordable housing to this is recognised through the Places for Everyone Plan, and as such delivery of further affordable housing is identified as a high priority.
- 5.2.24 The Places for Everyone Plan sets the overall housing provision for Manchester, but the size, type and tenure of housing is assessed at the district level. As such, it is for Manchester City Council to set affordable housing targets.
- 5.2.25 In Manchester specifically there is a shortage of affordable housing; whilst new and diverse neighbourhoods are coming forward in and around the city centre and inner areas of Manchester, there is a lack of options for home ownership, and growing numbers of households on the housing register. In recognition of this, the Council's Housing Strategy includes a target to deliver 10,000 new affordable homes between 2022 and 2032.
- 5.2.26 The supporting evidence base (Housing Needs Assessment 2023) identifies an annual need for 1,142 affordable homes which is 32% of the overall annual supply of homes identified to be delivered by the draft Plan. Policy H2 (Affordable Homes) in the draft Plan states, "It will be expected that 30% of homes in major schemes (10 or more homes) will be affordable. Developers are expected to use the 30% target as a starting point for calculating affordable housing provision."
- 5.2.27 The Council has considered different affordable housing targets – 20% and 30%. The basis of the 20% target is the current policy approach in the adopted Core Strategy, whilst the 30% target represents an approach closely aligned to the overall affordable housing need identified in the HNA. The 30% requirement features in Policy H2 in the draft Plan, as this reflects the demand identified in the HNA. Moreover, it is in line with the Council's proactive approach to addressing housing needs in Manchester, set out in the Housing Strategy.

- 5.2.28 An assessment that compares 20% and 30% targets has not been undertaken in the IA. This is because the impact upon viability is the key differential between affordability targets (and this is explored in viability evidence for the Plan).
- 5.2.29 Given that the affordability policy (and other plan policy clauses) is subject to viability, it is considered unlikely that delivery of housing would be affected significantly. Therefore, the options would perform similarly in this respect.
- 5.2.30 Higher affordability targets are likely to better support health and community metrics, with the key tension being the ability to deliver a range of other 'development contributions' as well that are not mandatory and are 'subject to viability'.
- 5.2.31 Higher affordability could limit the ability to achieve higher standards in other aspects of sustainability, but this would differ on a case-by-case basis and is difficult to reach meaningful conclusions through a strategic assessment (with no indication or hierarchy of preference given in relation to securing contributions).
- 5.2.32 In this regard, the Council has concluded that there are no reasonable alternatives to appraise in the IA with regards to affordable housing.

### **Airport growth**

- 5.2.33 Manchester Airport is the third busiest passenger airport in the UK, and the largest airport outside of London. It is a key contributor of infrastructure in northern England, allowing for greater business and leisure traffic, and as such is an important area for growth in Manchester and the wider area. Under national policy, the airport is to be expanded; increasing the route network, improving facilities to enhance customer experience, and meeting changing needs of passengers and airlines.
- 5.2.34 The decision to expand Manchester Airport has been made on the national level, and as such, development will need to be in line with national policy – including the Aviation Policy Framework 2013; Beyond the Horizon – The Future of Aviation: Making best use of existing runways 2018; Flightpath for the Future 2022; and Jet Zero Strategy 2022. These national policies and strategies seek to make the best use of existing runway capacity in the UK, and ensure aviation supports the national objective of long-term economic growth.

Growth at the airport and surrounding areas (i.e. Airport City) is also included within the Places for Everyone Plan, which outlines the strategic importance of the airport for economic growth. The PfE Plan also indicates that the services and facilities of the airport will make a major contribution to the competitiveness of the north of England, as well as the Midlands and Wales by supporting inward investment, international trade, tourism, social regeneration, economic regeneration, and high-quality homes.

- 5.2.35 The PfE Plan supports development that facilitates the expansion of air freight facilities and a range of economic sectors such as logistics and advanced manufacturing. There is also an emphasis on improving accessibility to the airport.

- 5.2.36 It is recognised that airport expansion could lead to significant greenhouse gas emissions and that decarbonisation of this sector is challenging. In this regard, efforts to address greenhouse gas emissions are captured within the Manchester Airport Group Corporate Social Responsibility Strategy and the PfE, which seeks to ensure that a 'sustainable world class airport' is delivered. There is also a focus on maximising sustainable transport modes to support airport growth.
- 5.2.37 The Council acknowledge that there is a need to accelerate decarbonisation efforts if it is to meet its challenging targets to become net zero. This has involved exploring how the Local Plan could shape development in and around Manchester Airport to improve climate change credentials.
- 5.2.38 In conclusion, the Council consider that there are no reasonable alternative strategies for growth associated with the airport given that there is an established framework for Manchester Airport, the Enterprise Zone and associated developments. The Council also considers that climate change mitigation and resilience is covered sufficiently in the PfE and other relevant strategy documents for Manchester Airport (for example masterplans). It would not be reasonable to introduce policies within the Local Plan that contradict or depart from these approaches. Growth is set by national policy and the increase is largely unavoidable, the Manchester Local Plan works to reduce the potential for adverse impacts and incorporates mitigation measures.

## **Part 2: What are the IA findings at this stage?**

## 6. Introduction (to Part 2)

- 6.1.1 This part of the Interim IA Report focuses on the current stage of Plan making (i.e. the draft Plan).
- 6.1.2 Firstly, a full appraisal of the draft Plan is presented against the IA Framework. Each section represents a topic / objective within the IA Framework. This is followed by a tabular summary of the significant effects and a short discussion of the findings. Lastly, any recommendations (i.e. mitigation or enhancement measures) that have been identified throughout the appraisal process are drawn out and summarised in a separate chapter.

# 7. Appraisal of the draft Plan

## 7.1 Background

- 7.1.1 The aim here is to present an appraisal of the 'content' of the Manchester Draft Local Plan document.
- 7.1.2 Development across the city has led to increased housing, increased business investment, and increased job opportunities. However, there is a demand for more housing – especially affordable housing, and homes for those that require supported care and accommodation for students. It is also noted that there are significant levels of economic activity in the city. At the same time there are issues of poor health and poverty that need to be addressed to ensure a fairer and more equitable city. The Manchester Draft Local Plan seeks to provide spatial policies to address growth, inclusivity, health, housing, climate change and transport. This is anticipated to help tackle inequalities across the city.
- 7.1.3 The Plan consists of a vision and objectives, which is then expressed in spatial terms through spatial principles and several broad locations for growth. This is further supported by a range of location-specific and thematic policies that complement the policies in PfE at a local level for Manchester.

## 7.2 Approach and methodology

- 7.2.1 A narrative discussion is presented under the 'IA framework', which essentially comprises a list of sustainability objectives (as set out in Chapter 3). Under each of the IA framework objectives, the aim is to present a discussion highlighting the merits and drawbacks of the draft Plan.
- 7.2.2 The aim is to ensure that IA work is focused, concise and proportionate, focusing only on effects judged to be potentially 'significant' (as opposed to every conceivable effect). This is a key element of best practice in the opinion of AECOM, mindful of recent experience and the Planning White Paper (2020). Where appropriate, there will be the potential to consider whether further work to explore reasonable alternatives is required at subsequent stages of the plan-making process.
- 7.2.3 To determine the significance of effects, account is taken of a range of factors including magnitude, duration, frequency, likelihood, permanence, and timescale. The potential for cumulative and synergistic effects is also considered by taking account of how the different proposals within the Plan interact. Consideration is also given to the interaction of the Plan with other plans, policies and programmes that affect the baseline position.
- 7.2.4 Each draft Plan policy has been considered in the appraisal, but the findings have been discussed on a 'whole plan' basis (rather than commenting on every policy individually in the plan appraisal narrative set out in this section). This is important as policies should be read in the context of the whole draft Plan and not in isolation.

- 7.2.5 Policies can interact with one another to create cumulative effects, synergistic effects and to help mitigate potential negative effects. Where this is the case, such factors are discussed in the appraisal findings, including reference to individual policies as relevant.
- 7.2.6 To aid in interpretation of the overall findings, **Appendix A** sets out a matrix that concludes on the broad implications of each policy (i.e. whether it is broadly positive, negative or neutral). As outlined above, it is not necessary to determine the significance of individual policies, but this 'policy screening' exercise allows for a focus on policies that are likely to be more relevant for the different SA topics.
- 7.2.7 Secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects have been considered for each topic as part of the assessment process. These are drawn out in the appraisal text as relevant. As discussed above, it is not necessary to comment on the characteristics of effects for every element of the draft Plan individually.
- 7.2.8 It can be assumed that where effects have not been identified within the appraisal text for certain policies, that these were not important factors in determining overall significance.

## 7.3 Natural Environment

**IA Objective:** *To protect and enhance the natural environment, including biodiversity (habitats and species), geodiversity and soils.*

### **Spatial Principles and Strategic Growth Locations**

- 7.3.1 The overarching spatial strategy places a strong emphasis on supporting biodiversity and the natural environment across Manchester. This includes through the integration of a comprehensive green and blue infrastructure network across the city, such as parks, river valleys, and woodlands, which contribute to biodiversity, climate resilience, and improved quality of place (Policy 'Strategic Growth Locations'). The strategy supports development that enhances ecological networks and enables access to nature, particularly in areas experiencing significant growth. In addition, the plan highlights the need to consider infrastructure requirements associated with future population changes, including the delivery of new green spaces and improvements to existing ecological assets such as open space (Policy 'Manchester City Centre'). This aligns with the strategic ambitions set out in the Places for Everyone Policies JP-G1 through JP-G9, in particular JP-G9: A Net Enhancement of Biodiversity and Geodiversity, which promotes the enhancement of green infrastructure, and the integration of natural solutions into development.
- 7.3.2 The strategic growth locations provide significant growth opportunities, focusing development into the Core Growth Area and Inner Areas, reducing the pressure on the natural environment by prioritising brownfield development, thus avoiding greenfield and ecologically sensitive locations (Policy 'Strategic Growth Locations').
- 7.3.3 None of the strategic growth locations overlap with international or national designated habitats for biodiversity. However, the Manchester Airport Strategic Site (Policy SGL13) is located directly adjacent to the Cotteril Clough SSSI, which is currently in favourable condition. Furthermore, the site is located in proximity to locally designated biodiversity assets such as the Sites of Biological Importance (SBIs) – Painswick Park Meadow, Sunbank Wood and Ponds, Cotteril Clough, Marl Pit Ponds near Manchester, and Airport Runway and Hooksbank Wood. Development located in this strategic area has the potential to generate significant negative effects on biodiversity species and the integrity of the designation. The site is also directly adjacent to a number of priority habitats and ancient woodland, which development has the potential to have negative impacts upon. However, to mitigate potential damage Policy SGL13 (Manchester Airport Strategic Site) requires that development associated with this site will avoid harm to the designated SSSI and avoid, mitigate and compensate any harm to nearby designations. Further, development must integrate landscape buffers, retain mature trees and woodland, and contribute to strategic green corridors to mitigate the impacts of airport expansion and urbanisation.



- 7.3.4 Development through the strategic growth locations of Victoria North, Holt Town, and Sportcity (Policies SGL4, SGL5 and SGL6 respectively) will all contribute positively towards the natural environment by enhancing and extending the green and blue infrastructure network – for instance the creation of City River Park in Victoria North, and the transformation of Ashton Canal Park.
- 7.3.5 Further, these policies seek to take opportunities to incorporate green infrastructure and sustainable transport where possible, bringing positive benefits to the natural environment. Central Park and Strangeways (Policies SGL7 and SGL8) also present opportunities to contribute to the natural environment through targeted urban greening, sustainable drainage, and enhancements to riverside corridors such as the Irwell.
- 7.3.6 The policies covering North Manchester General Hospital (Policy SGL9) and Wythenshawe Centre and Adjacent Areas (Policy SGL10) also present opportunities to support the natural environment through the sensitive redevelopment of land within or adjacent to existing green assets. At North Manchester General Hospital, the policy highlights the need to retain and enhance the area's substantial green infrastructure, including mature trees and landscape features, with the potential to contribute to ecological connectivity across north Manchester. Similarly, the area covered by Policy SGL10 (Wythenshawe Centre and Adjacent Areas) is located near multiple ecologically important areas, including Sunbank Wood. While the site policy does not explicitly reference biodiversity or ecological mitigation, broader plan policies will apply to ensure the protection and enhancement of these sensitive natural features. These locations therefore offer opportunities to support biodiversity and contribute to the wider green infrastructure network, provided that nature-sensitive design and appropriate mitigation measures are applied through the development management process.

### **Thematic policies**

- 7.3.7 The Local Plan has a number of other policies that provide a wide range of measures that seek to protect and enhance the natural environment. These include Policy EN4 (Biodiversity and Geodiversity), which requires development proposals to avoid significant adverse impacts on designated sites, from international to local designations, and if there are adverse impacts, they need to be fully justified. Further, it requires development proposals to demonstrate how they will contribute positively to nature recovery and deliver measurable Biodiversity Net Gain (BNG), in accordance with national policy. A number of policies support this policy's objectives, including Policy EN3 (Trees and Woodlands), which supports the retention of existing trees, particularly mature and veteran specimens, and requires replacement planting to enhance habitat quality.
- 7.3.8 Though large parts of Manchester are urbanised, there are potential opportunities to achieve net gain. It will be possible to deliver net gain on some development sites, and when this is not possible, there is potential for off-site improvements to be made (though it will be necessary to establish delivery mechanisms).
- 7.3.9 Lancashire Wildlife Trust (LWT) has estimated that open space sites in Manchester City Council ownership could supply many times the predicted demand for mandatory BNG.

- 7.3.10 Several 'opportunity sites' are close to strategic growth locations and ought to offer good opportunities for near site enhancement. In this respect, there is considerable certainty in relation to positive effects arising.
- 7.3.11 Policy EN6 (Urban Green Factor) ensures that green infrastructure and ecological features are integrated into development at the earliest design stages, delivering on-site biodiversity benefits. This policy is very important in the context of enhancing green infrastructure within the urban parts of the City, where biodiversity net gain, might not necessarily lead to significant 'greening'.
- 7.3.12 Policy EN1 (Strategic Green and Blue Infrastructure) identifies key corridors such as river valleys, parks and open spaces as central to the city's ecological network, promoting their protection and enhancement. In combination, these policies create a layered approach to conserving biodiversity, reinforcing the principles of nature recovery and ecological connectivity across the city.
- 7.3.13 Additional environmental policies further protect the natural environment by embedding ecological and green infrastructure considerations into wider aspects of development. Policy EN2 (River Valleys and Waterways) promotes the protection, naturalisation and enhancement of Manchester's river corridors as key ecological assets, supporting riparian habitats and linking urban biodiversity networks.
- 7.3.14 Policy EN8 (Water Quality) contributes indirectly by requiring development to safeguard and improve the quality of surface and groundwater, including wetlands, which can support biodiversity when integrated with sustainable drainage systems.
- 7.3.15 Policy SI1 (Protection of Open Space, Sport and Recreation) encourages the protection and enhancement of open spaces, many of which provide multifunctional roles including informal wildlife habitat and green corridors through the urban fabric.
- 7.3.16 More widely, the development management policies support the natural environment at a site level. Policy DM1 (Development Principles) requires all development to respond positively to its context, including protecting and enhancing natural features and biodiversity assets. It sets a clear expectation that proposals will minimise environmental harm and make use of opportunities to improve the ecological value of sites.
- 7.3.17 Together, these policies ensure that development contributes to the city's natural environment through detailed design measures.

### **Overall effects**

- 7.3.18 The Local Plan is likely to have somewhat mixed effects, with large-scale growth associated with the strategic growth locations inevitably impacting habitats, with potential for some disturbances and losses. However, there are measures included in the strategic growth location policies covering biodiversity protection, ecological enhancement and blue and green network infrastructure delivery, which are coupled with wider policies that embed measurable biodiversity gain, nature recovery, and urban greening into the development process.

7.3.19 In combination, these provisions are likely to deliver long-term positive outcomes for biodiversity, ecosystem services, and climate resilience, provided they are implemented effectively. Overall, **moderate positive effects** are predicted, as short term impacts are likely to be mitigated, and in the long term, net gain projects and enhancement schemes should benefit the natural environment significantly.

## 7.4 Land resources

**IA Objective:** *Ensure the efficient use of land resources and reduce the environmental and health impacts of contaminated land.*

### **Spatial Principles and Strategic Growth Locations**

- 7.4.1 The Spatial Principles direct the majority of housing and office growth to the Core Growth Area and the Inner Areas, with an emphasis on the reuse of previously developed land. This has direct positive effects in terms of land use efficiency, which reflects the approach established within PfE. The regeneration of previously developed land could also have secondary benefits in terms of remediating contaminated land.
- 7.4.2 With regards to the Strategic Growth Locations, a mix of previously developed land and greenfield land is likely to be involved in development. In the context of the spatial strategy, the reuse of land and buildings will be supported, such as the redevelopment of buildings and derelict land in areas including Holt Town and Collyhurst. The Sportcity location is also likely to involve the repurposing of land (e.g. surface car parks, vacant sites, employment land).
- 7.4.3 High density development (for residential, employment and offices) is promoted in several of the Strategic Growth Locations, which further reduces pressure on limited land resources in the City. At the same time, the importance of open space is acknowledged. For example, Policies SGL2 (Manchester City Centre), SGL3 (City Centre Areas), SGL4 (Victoria North) and SGL (North Manchester General Hospital) propose enhancements to green and blue infrastructure.
- 7.4.4 There is evidence of historic contamination in several of the growth locations within the urban areas in particular. Where this overlaps with proposals for land use change, it offers the potential to remediate contamination and (through other plan policies discussed below) to ensure that health, safety and environmental concerns are addressed.

### **Thematic policies**

- 7.4.5 Mirroring the principles for growth and the approaches to strategic growth locations, several plan policies reiterate support for high density development and the efficient use of land. The following policies are noted as being particularly important in this respect
- 7.4.6 Policy EC3 (Existing Employment Space) seeks to protect the loss of employment land and to support refurbishment and redevelopment. This helps to reduce pressure and direct growth away from non-developed land which is more limited in supply. Policy H5 (Purpose Built Student Accommodation) will support high density development where it is close to the university campuses and demonstrate it can deliver positive regeneration. Policy H7 (Housing Design) supports the spatial strategy and growth on previously developed land.
- 7.4.7 The Centres policies (Policies C1 to C8) are beneficial with regards to land use as they seek to retain the important role of centres as a focus for economic activity, leisure and increasingly for residential. This helps to reduce pressure for development in more peripheral locations.

- 7.4.8 Policy EN10 (Ground Contamination and Ground Stability) is directly relevant to this topic as it states the Council's prioritisation for the redevelopment of previously developed land in strategic locations. The policy also requires consideration and addressing of land potentially affected by contamination. This reflects the requirements set out within PfE JP-S1 'Sustainable Development'.
- 7.4.9 Plan policies that seek to protect and enhance open space (Policy SL1 and Policy SL2) are also considered to be an efficient use of land resources and will help to offset minor losses in greenfield land.

### **Overall effects**

- 7.4.10 The draft Local Plan builds upon the Places for Everyone Plan which is supportive of the efficient use of land resources, the need to maximise brownfield land and optimising density.
- 7.4.11 The draft Plan focuses on well-connected sites in the Core Growth Area, supporting high-density development on brownfield land as a priority. Where growth locations overlap with greenfield land, there are plan policies that seek to protect existing open space and provide new green infrastructure, which offsets such losses.
- 7.4.12 Several plan policies reinforce this strategy and will further help to make efficient use of limited land. This includes the need to protect and enhance existing centres, support for high density accommodation and protecting employment areas.
- 7.4.13 Overall, **minor positive effects** are predicted. There is a strong focus on efficient land use, and this approach is already established within the PFE. As a result the Manchester Local Plan continues the focus established in PfE. The Local Plan provides a clear framework for delivering substantial growth on brownfield land within the City, seeks to protect open and green space, and address contamination where possible.

## 7.5 Housing

**IA Objective:** Promote the sustainable growth of the city's population.

### **Spatial Principles and Strategic Growth Locations**

- 7.5.1 The housing need for Manchester is set through the Places for Everyone Plan, which indicates just over 60,000 new homes will be needed over the plan period (2022-2039). Development will be directed to the most sustainable areas, primarily the City Centre and District centres. This includes approximately 40,000 homes in the City Centre (42,000 across the full
- 7.5.2 Core Growth Area which includes the City Centre), 15,000 in the Inner Areas, and 4,000 in the Southern Areas – totalling 61,000 new homes which is set out in Policy H1 (Housing Provision), and Policy SGL1 (Strategic Growth Locations). The overarching spatial principles of the Local Plan reiterate this, indicating that high-quality and diverse residential development will be focused within the Core Growth Area, as well as within district centres in the Inner Areas and within the Southern Area (Policy SP1: Spatial Principles).
- 7.5.3 The strategic growth policies also make specific provisions relating to housing, including incorporating mixed-use development schemes that brings forward a mix of housing sizes, tenures, and types, meeting demands for student accommodation, and encouraging a range of employment accommodation types (Policy SGL2: Manchester City Centre; SGL3 City Centre Areas; SGL4: Victoria North; SGL5: Holt Town; SGL7: Central Park (North); and SGL10: Wythenshawe Centre and Adjacent Areas).

### **Thematic policies**

- 7.5.4 The Local Plan includes specific policies relating to housing. For example, Policy H2 (Affordable housing) provides details on affordable housing provision – indicating that 1,142 housing units a year should be affordable housing for sale (20%) or for rent (80%), and that 30% of homes in major schemes of 10 or more dwellings will be affordable. Policy 4 (Supported Housing) also includes details for the delivery of housing to support independent living, requiring development to diversify options for older people and provide infrastructure to allow people with physical or learning disabilities or mental health support needs.
- 7.5.5 Additionally, Policy H3 (Accommodation for Gypsies and Travellers and Travelling Showpeople) outlines provision for gypsy, traveller and travelling showpeople accommodation; providing details on the suitability of new sites to ensure spaces can meet the needs of populations, and so that they can have easy access to local services. Furthermore, Policy H5 (Purpose Built Student Accommodation) provides a focus on providing sufficient levels of purpose-built student accommodation, so that the housing needs of students can be appropriately met.
- 7.5.6 The above demonstrates a focus of the Local Plan on ensuring there is sufficient accommodation for different age groups and demographics, thus promoting a diverse housing stock across the area.

- 7.5.7 This is reiterated through a focus on housing design in Policy H7 (Housing Design), which seeks to ensure new development contributes to creating mixed communities as well as considers spatial distributions and environmental constraints.
- 7.5.8 It is also noted that the Policy H6 (Self-build and custom house building) supports self-build and custom housebuilding where development will contribute to diversifying housing types and supply.
- 7.5.9 The wider Local Plan policies also make provisions in relation to housing. This includes supporting residential extensions to houses, flats and apartment buildings where development considers important factors, including (but not limited to) the impacts on the general character of the property, and effects on neighbouring properties (Policy DM2: Residential Extensions). This is considered to be a positive effect in relation to housing by promoting redevelopment of existing residential structures, which is anticipated to help people stay in their homes for longer and is complementary to the delivery of housing on the strategic sites identified within the Plan.
- 7.5.10 Policy H8 (Houses in Multiple Occupation) protects family homes by limiting conversions to HMOs to specific circumstances. This is positive in terms of housing types, as there is an evidenced need for larger family homes in the City.
- 7.5.11 Additionally, support will be given to flat conversions where design proposals regard important factors including (but not limited to) the standard of accommodation created, the effects on adjoining houses, and the provision of refuse storage and collection facilities (Policy DM3: Flat Conversions).
- 7.5.12 Through Policy DM4 (Housing on Backland sites) housing will also be permitted where it meets specific criteria, including not resulting in the loss of privacy for adjoining dwellings, and there is sufficient space between proposed and existing dwellings/

### **Overall effects**

- 7.5.13 The housing strategy for Manchester is largely determined by the Places for Everyone Plan. There is a large amount of committed development, and a significant market for housing. In this respect, significant effects are likely to arise anyway in the absence of further policy being set out through the Manchester Local Plan, as previously identified in the integrated appraisal of PfE.
- 7.5.14 The Local Plan works well to concentrate housing growth in the most sustainable locations and seeks to ensure the housing stock reflects the needs of the community. This includes older residents, people with physical and learning disabilities and mental health support needs, and the gypsy, traveller and travelling showpeople communities. Despite much of the housing being high density, there is still an intention to deliver larger homes in parts of the growth locations where appropriate, and family homes are protected from conversion to other uses where appropriate. Therefore, **minor positive effects** are predicted related to housing.

## 7.6 Community

**IA Objective:** Provide safe, attractive, inclusive neighbourhoods, which include, or are well connected to centres and other amenities.

### **Spatial Principles and Strategic Growth Locations**

- 7.6.1 The Local Plan policies have a community focus, through ensuring new growth is well connected and has good quality building and public realm standards. This is achieved through focusing growth in the most accessible and sustainable locations in the spatial hierarchy across Manchester (Policy SP1 (Spatial Principles). This is also achieved through Policy SP2 (Development Principles) which seeks to protect green spaces and bring forward well-designed places that promote social cohesion and consider the needs of all community members.
- 7.6.2 The strategic growth locations and their associated policies are likely to have the greatest impact upon communities across Manchester (given that they will accommodate a significant amount of new housing, office space and other employment growth). The 'strategic growth location' policies present detail on how development should be shaped – outlining key considerations for the different areas, including green infrastructure provision, access and connectivity, social infrastructure, leisure and recreation facilities and what kinds of development are most appropriate for different communities. A range of measures are supported that will help to create safe, attractive and inclusive communities including the need to create safe environments, promote social contact and civil resilience – examples of the considerations can be found in all of the strategic growth locations policies (Policies SGL2 to SGL13).
- 7.6.3 As such, the strategic growth locations are considered likely to bring forward positive effects in relation to community. This is likely to be achieved through ensuring housing development, economic development, and health development is well-connected to services and facilities, and is well designed. For example, by ensuring services and facilities are located in accessible locations, development in the strategic growth locations is likely to allow communities to remain together – as there will be a reduced need to travel or move away to access important infrastructure. Additionally, enhanced connectivity and an enhanced public realm is anticipated to improve feeling of safety
- 7.6.4 Whilst there are potential positive impacts as noted above, the approach to growth in Manchester, especially through these spatial growth locations, has the potential to lead to negative impacts. For example, increased development density and an increased population living within central Manchester could lead to segregation of communities and increased tensions between different groups. Whilst development is pre-determined by the overarching Places for Everyone Plan, the Manchester Local Plan could seek to help mitigate potential negative impacts by encouraging mixed communities, facilities and tenures – to help promote a sense of integration and cohesiveness.



## **Thematic policies**

- 7.6.5 The wider Plan policies also make provisions for the communities of Manchester. This includes setting out design principles related to securing net zero carbon emissions featured in Policy ZC2 (Towards Zero Carbon) and Policy ZC3 (Low Carbon Energy Developments), to ensure renewable energy infrastructure is safe and secure for residents, and contributes significant social, economic and community benefits.
- 7.6.6 A community focus is also present through policies related to housing and the centres across Manchester. This includes ensuring development addresses the needs of diverse and inclusive communities (Policy D1: Design Principles). Furthermore, Policy H6 (Self-build and custom housebuilding) outlines support for new homes on small sites where they include community-led housing.
- 7.6.7 Policy H8 (Houses in Multiple Occupation) should also protect the character of residential areas and maintain community safety.
- 7.6.8 Several policies also include an emphasis on ensuring important services to local communities are retained and enhanced in line with the centre hierarchy, to help ensure access to key infrastructure is not adversely impacted (Policy C3: District Centres); (Policy C7: Local Centres); and Policy C8: Out of centre development).
- There will be a need to protect existing open space, sport and recreation land and facilities (Policy SL1), and (in line with evidenced need and viability) the provision of new facilities (Policy SL2).
- 7.6.9 The Plan also features policies that are anticipated to contribute towards community enhancements by increasing the vibrancy and vitality of centre environments across the Plan area. This includes Policy C9 (Entertainment, leisure and Food and Drink Developments); Policy C10 (Leisure and the Evening Economy); and Policy C11 (Hotel and Visitor Accommodation), which together support the evening economy, leisure opportunities and tourism.
- 7.6.10 Community is also considered through ensuring the development of land appropriately resolves contamination and stability issues where these arise. By ensuring development in areas with potential ground contamination are accompanied by a human health and an environmental risk assessment, and mitigation measures are put in place where appropriate, community is safeguarded. This is due to a focus on maintaining health and wellbeing, and reducing the potential for development to be adversely impacted or inappropriately located.
- 7.6.11 The development management policies are also anticipated to impact upon community. This is due to the heavy focus on the design of development and the public realm, to make certain that proposals bring forward attractive development. This includes ensuring development is designed with community safety and crime prevention in mind (Policy DM1: Development Management).

- 7.6.12 It also includes supporting residential extensions, flat conversions and housing on backland sites where such development will not affect the amenity of neighbouring occupiers and is designed with the character of the existing structure in mind (Policies DM2: Residential Extensions); (DM3: Flat Conversions); and (DM4: Housing on 'Backland' sites). Through these policies, the amenity of the existing built environment, and its importance to the community, is maintained through development.

### **Overall effects**

- 7.6.13 Overall, the Plan policies work well to benefit the community, leading to **minor positive effects**. This is achieved through the focus on delivering connected growth with good access to services and facilities, the delivery of new social infrastructure, and a focus on design and public realm improvements. The Plan also works positively to ensure contamination and stability issues are resolved – which contributes to maintaining health and safety.

## 7.7 Sustainable Growth

**IA Objective:** *Promote the sustainable growth of the city's economy, accommodating indigenous and inward investment.*

### **Spatial Principles and Strategic Growth Locations**

- 7.7.1 Sustainable growth is a key consideration for the overall spatial strategy, which focuses on economic and commercial development, retail, leisure and cultural activity in the Core Growth Area, as well as engaging with economic opportunities linked to Manchester Airport, Wythenshawe District Centre, and the Wythenshawe Hospital (Policy SP1: Spatial Principles). This is anticipated to bring forward approximately 1.4 million square metres of office development and 50,000 square metres of industrial and warehousing development within the city by 2040, which is likely to support further employment opportunities and associated access as set out in Policy SGL1 (Strategic Growth Locations) and Policy SP2 (Development Principles). This is in line with the Places for Everyone Joint Development Plan policies.
- 7.7.2 By focusing business, retail, leisure, culture and tourism development within the City Centre as far as possible, the plan contributes to sustainable growth by supporting development within a well-connected area that is well-served by infrastructure. This is anticipated to maintain and enhance the economic function of the city centre area expressed in Policy SGL2 (Manchester City Centre) and Policy T2 (Sustainable location of development), for example through the high-density commercially led mixed-use development of offices, hotels, restaurant, and leisure and retail within the identified neighbourhoods (Policy SGL3: City Centre Areas).
- 7.7.3 Employment development forms a key component of growth in the Holt Town area – including approximately 20,000 square metres of commercial space, leisure and cultural facilities (Policy SGL5: Holt Town). Additional commercial, business, service and hotel space is also anticipated to come forward with the Sportcity area (Policy SGL6: Sportcity). This is likely to bring forward positive effects in relation to sustainable growth by providing additional employment space across key regeneration areas in the City.
- 7.7.4 The Central Park (North) area is anticipated to provide 25,000 square metres of research and development, light industrial, and sui generis employment space (Policy SGL7: Central Park (North)). Mixed use development is also supported in the Strangeways area, including a focus on offices, research, development, light industrial, warehousing and sui generis employment and commercial development (Policy SGL8: Strangeways). Office space is also included as a focus for development in the North Manchester General Hospital and Wythenshawe Hospital, as well as commercial, retail and leisure facilities that are complementary of the hospital campus and use (Policy SGL9: North Manchester General Hospital) and Policy SGL11 (Wythenshawe Hospital). Finally, office space, advanced manufacturing and ancillary commercial facilities are also encouraged in and around Manchester Airport, to help maximise employment opportunities for local communities in Policy SGL12 (MIX Manchester – Airport City).

- 7.7.5 Development across these areas is anticipated to bring forward positive effects in relation to sustainable growth by providing additional employment space and opportunities for local communities and residents in the wider Manchester city area.
- 7.7.6 Educational development is supported in the Sportcity area where development will need to deliver local community and learning space, to allow for training opportunities and benefits for the local community (Policy SGL6 (Sportcity)). Furthermore, educational development is also encouraged to come forward within the North Manchester General Hospital area, to deliver flexible seminar and lecture spaces, and clinical skills training facilities – this is also a focus for Wythenshawe Hospital (Policy SGL9: North Manchester General Hospital) and Policy SGL11 (Wythenshawe Hospital)’. Training opportunities are also a focus for development within and around Manchester Airport (Policy SGL12: MIX Manchester – Airport City). The focus on educational opportunities through development is considered to be a positive impact in relation to sustainable growth in Manchester.
- 7.7.7 Additionally, improvements to utilities infrastructure are also supported in the Holt Town area; development will need to integrate smart infrastructure in the neighbourhood which is set out in Policy SGL5 (Holt Town).
- 7.7.8 It is anticipated that development through these strategic growth areas will contribute positively towards international, national and regional economies. This includes through making the areas more accessible and connected to international, regional, national and local economic centres (for example, through rail development and growth at Manchester Airport), and making it a more attractive place to visit in relation to available services and facilities. The increased capacity of services and facilities is likely to encourage greater numbers of visitors into the area, which will contribute to the economy further by increasing spending in Manchester.

### **Thematic policies**

- 7.7.9 The ‘Economy, Employment and Skills’ policies are anticipated to contribute towards sustainable growth. This is likely to be achieved through identifying key economic growth locations to accommodate new office floorspace and the continued support of industrial and warehousing activity, and upgrading existing employment areas (Policy EC1: Employment Provision); (Policy EC2: Economic Development Areas); and (Policy EC3: Existing Employment Space). This is considered likely to help maintain and enhance employment opportunities and variety.
- 7.7.10 The Centres policies also have the potential to impact upon sustainable growth. This is likely to be achieved through ensuring appropriate mixes of development (including employment and educational opportunities) come forward in the most sustainable locations in terms of accessibility in line with the centre hierarchy set out in Policy C1 (Centre Hierarchy). This is also likely to include ensuring that retail, leisure, cultural and tourism development comes forward within the wider city centre environment (Policy C2: City Centre Retail), and sufficient key services including retail, public services, and financial and legal services come forward within District Centres featured in Policies C4 to C6.

- 7.7.11 It also reflects the focus on retaining service and retail provision within local centres within Policy C7 (Local Centres). This links to the policy on Character Areas (Policy D2), which seeks to ensure development proposals consider the distinct character areas of the city and promote suitable and sustainable growth in these areas.
- 7.7.12 It is noted that there is a focus on enhancing existing employment opportunities and encouraging new development to come forward where appropriate within the leisure, food and drink and nighttime economy. This is linked to cultural, entertainment and leisure, food and drink and sui generis growth within Policies C9 (Leisure Developments); C10 (Leisure and the Evening Economy); and C12 (Hot Food Takeaways), and the provision of hotels and serviced apartments in Policy C11 (Hotel and Visitor Accommodation), in line with the established centre hierarchy. Again, this is anticipated to contribute to sustainable growth by encouraging additional employment opportunities to come forward, especially within the most sustainable locations.
- 7.7.13 The capacity and coverage of utilities is also considered in Policy EN11 (Waste). This includes a focus on ensuring current waste management infrastructure is maintained, and future waste management is considered within development proposals. This is also reflected in Policy T4 (Digital Infrastructure) by stipulations relating to digital infrastructure, which indicate development proposals will need to provide sufficient space for full fibre connectivity infrastructure to meet the demand for mobile connectivity. It is anticipated that a focus on utilities and their associated infrastructure will contribute positively towards sustainable development by ensuring new growth will not cause a decrease in the efficiency of important networks, with a converse effect of enhancing them.

### **Overall effects**

- 7.7.14 The Local Plan builds upon the Places for Everyone Plan, which is encourages development that supports communities, the natural environment and economic activity within Manchester.
- 7.7.15 The Local Plan focuses on bringing forward sustainable growth within the Core Growth Area and on sites with identified economic, employment and utilities opportunities. This is a positive effect in relation to sustainable growth due to focusing new development in accessible locations. Several of the wider plan policies also reinforce this approach.
- 7.7.16 Overall, **major positive effects** are predicted. This is due to the focus of the Local Plan on providing sustainable growth in the most accessible locations and providing enhanced employment and educational opportunities for communities in Manchester.

## 7.8 Equality

**IA Objective** - *Reduce poverty and social deprivation and secure economic inclusion.*

- 7.8.1 The assessment of potential impacts on equality set out in this document will be complemented by an Equality Impact Assessment undertaken by the City Council. To date, work on the Equality Impact Assessment is ongoing, informed by research, consultation and findings to date. The assessment will be considered further following the next phase of consultation alongside additional research. An Equalities Impact Assessment will be published as part of the Regulation 19 consultation which is planned for summer 2026.

### **Spatial Principles and Strategic Growth Locations**

- 7.8.2 The Plan acknowledges and champions Manchester's diversity and seeks to bring about a more equal city going forward. To contribute toward this, the Spatial Principles (Policy SP1) seek to promote inclusive and sustainable growth. The focus on compact development, walkable neighbourhoods, and well-connected communities is likely to help support equal access to services, employment and public transport, particularly benefiting groups who are more likely to experience transport disadvantage, such as older people, disabled people, women, and low-income households. The principle of integrating green and blue infrastructure into communities also supports mental and physical wellbeing across all groups, and particularly benefits children, older people, and pregnant women. These inclusive outcomes are reinforced by the Policy SP2 (Development Principles), which expect development to consider accessibility, inclusive design and the integration of social infrastructure. Further, the Development Principles state that all development across the city should consider the needs of all members of the community, regardless of their protected characteristics. The policy also emphasises the importance of interventions that address health inequalities in Manchester, and the importance of making Manchester a fairer place to live.
- 7.8.3 In terms of targeting growth in accessible locations, the spatial strategy directs major growth to the Core Growth Area and Inner Areas, supported by regeneration and infrastructure investment. This concentration of development, including in areas such as Victoria North, Strangeways, and Holt Town, has potential to reduce spatial inequalities by improving access to jobs, housing, transport, and local services for communities that include higher proportions of ethnic minorities and younger residents. However, the benefits will depend on delivery mechanisms ensuring affordable housing, social infrastructure, and inclusive design are prioritised. Without targeted engagement, there is a risk that regeneration could inadvertently lead to displacement pressures that impact lower-income or marginalised groups. This could lead to community segregation in Manchester, as well as increase the potential for crime and antisocial behaviour.
- 7.8.4 To help mitigate this potential for negative effects linked to equality, it would be beneficial to ensure appropriate levels of affordable housing comes forward in development areas, encourage tenure blind developments with a mix of housing offerings and promote social infrastructure that supports multiple community groups.

- 7.8.5 Promoting affordable housing in perpetuity in appropriate locations would also be beneficial. This will help ensure that residents have a good level of access to housing and can help to reduce community segregation.
- 7.8.6 Many of the strategic growth locations are situated in or adjacent to neighbourhoods with higher levels of deprivation or health inequality. As such, development could exacerbate equality issues in these areas, including deprivation linked to crime, and deprivation linked to barriers to housing and services.
- 7.8.7 In Victoria North, Holt Town, and Sportcity (Policies SGL4, SGL5 and SGL6), major investment in new homes, parks, schools sports and leisure facilities and public transport could have significant positive impacts for younger people, ethnic minority groups, and disabled residents. These areas are expected to deliver active travel routes and new public spaces that promote social inclusion, which could particularly benefit women, older adults and families. Policy SGL10 (Wythenshawe Centre and Adjacent Areas) includes healthcare innovation and new employment opportunities, which could benefit a range of groups, provided that employment practices are inclusive and public transport accessibility is improved. Development at Manchester Airport must ensure inclusive access to employment and mitigate potential severance or noise impacts on surrounding communities, some of whom may include older residents or those with long-term health conditions.
- 7.8.8 It is recognised that growth focused within Manchester could bring forward negative effects that could impact upon equality. For example, denser development in the city environment could lead to increased noise, pollution and crime levels, which could impact upon different community members in a variety of ways (e.g. increased pollution could impact upon health of residents, increased crime could impact upon vulnerable people or on particular groups). It is considered that the strategic growth policies work well to mitigate impacts to equality, but it is recommended that more in-depth and detailed equality impact assessments are undertaken alongside growth proposals to fully understand potential impacts and deploy appropriate mitigation work. The work the City Council is undertaking on an Equality Impact Assessment will inform both a future iteration of the Local Plan (Regulation 19 version) and can feed into more detailed proposals in due course.

### **Thematic policies**

- 7.8.9 When it comes to the wider Plan, there are a number of policies that support the overarching aim of a more equal Manchester. An important part of the plan relating to equality are the policies on housing. Policy H1 (Housing Provision) sets out the requirement to deliver a range of housing types, sizes and tenures to meet the needs of a growing and diverse population.
- 7.8.10 Crucially, Policy H2 (Affordable Housing) seeks to secure affordable housing contributions on qualifying sites (30% affordable housing on development of 10 or more homes), which is likely to benefit low-income households, lone parents (the majority of whom are women), younger adults, and ethnic minority groups, who are all statistically more likely to experience barriers to affordable and secure housing.

- 7.8.11 Policy H4 (Supported Housing) further supports equality by requiring a proportion of new dwellings to meet higher accessibility standards, ensuring that homes are suitable for older residents, disabled people, and those with long-term health conditions. These policies are anticipated to contribute towards reducing equality issues linked to deprivation associated with barriers to housing and services, as housing will be more available and accessible for a wide range of demographics.
- 7.8.12 The Plan encourages the delivery of accessible and adaptable homes. The inclusion of these principles within affordable housing and specialist housing proposals should improve housing choice and independence for people with mobility impairments, long-term health conditions, and age-related needs.
- 7.8.13 Policy H4 (Supported Housing) reiterates the policy approach set out in PfE (Policy JP-H3) stating 100% of homes are to be built to Part M4(2) regulations. Policy H4 also states a minimum of 4% homes are required to be compliant with Part M4(3) regulations. The combined effect of these housing policies is expected to have positive impacts on reducing housing-related inequalities and supporting communities with protected characteristics across the city.
- 7.8.14 Other housing policies include Policy H3 (Accommodation for Gypsies and Travellers and Travelling Showpeople) which requires sites to be accessible by active travel and vehicular access, and public transport to key local services including education, health and community facilities, should benefit these communities and also improve accessibility for these groups who are known to have lower literacy levels. Policy H5 (Purpose Built Student Accommodation) prioritises development that integrates with existing neighbourhoods and how development can contribute to crime prevention, which can benefit areas with higher levels of deprivation including crime deprivation. Finally, Policy H7 (Housing Design) requires new residential development to contribute to mixed communities which support groups with protected characteristics such as BME communities, disabled, and elderly people. It will be important for housing development to encourage community cohesion across different protected characteristics, to reduce inequality linked to access. By encouraging vibrant and mixed communities, segregation and issues related to it are anticipated to be reduced.
- 7.8.15 Policy H8 protects family housing from conversion to Houses in Multiple Occupation. On one hand, this will benefit the wider population by protecting this type of housing. Conversely, those groups that are seeking HMO accommodation could potentially be affected if need does not keep up with demand. This is more likely to affect young people and migrant communities compared to other demographics (though policies H4 and H5 make provision for such groups).
- 7.8.16 In terms of other policies related to equality, Policy SI2 (Provision of new Open Space, Sport, and Recreation land and facilities) is expected to contribute positively to equality through improved access to high-quality outdoor spaces and recreational facilities. These are especially important for children, families, older people, disabled people, and ethnic or faith communities, who may rely more heavily on local open space for leisure, exercise and cultural activities.



- 7.8.17 Enhancements to green space are particularly targeted in growth areas such as Victoria North, Holt Town and Strangeways, which are adjacent to some of Manchester's more deprived and diverse neighbourhoods. These improvements are likely to contribute to better health and wellbeing outcomes for groups with protected characteristics who are disproportionately affected by poor access to green space. It could also help to reduce levels of crime and antisocial behaviour by creating more space with community surveillance opportunities and higher visibility.
- 7.8.18 More broadly, other relevant policies include Policy T1 (Transport Principles) which seeks to remove barriers to public transport and active travel, as well as ensuring that transport prioritises pedestrians and those with mobility aids, as well as cyclists. These measures are especially beneficial for groups who are less likely to own or use a private vehicle, such as disabled people, women, younger and older people, and lower-income households.
- 7.8.19 Policy C12 (Hot Food Takeaways) is also likely to have beneficial impacts on younger populations, with restrictions applying in scenarios where takeaways are located in proximity to schools, or in proximity to one another.

### **Overall effects**

- 7.8.20 The Local Plan seeks to protect groups with protected characteristics (discussed specifically below). Development through the strategic growth locations is generally anticipated to benefit a range of communities, including existing areas experiencing multiple deprivation. Whilst there is potential for negative impacts relating to equality to come forward, including (but not limited to) gentrification, community segregation, and increases in crime and antisocial behaviour, it is considered that the policies work well to mitigate these potential effects. Several policies in the Local Plan seek to address inequalities including measures within housing policies, improvements to public transport and active travel, and improvements in accommodation and services for vulnerable and protected groups, including looked after children and gypsies and travellers. Overall, **moderate positive effects** are predicted.

Protected Characteristics	Summary of impacts
Age	Positive effects are likely for younger people through policies that support new and improved schools, early years provision, and open space. The Plan also encourages active travel and safer neighbourhoods, which benefit older people. Measures to manage hot food takeaways may have indirect health benefits for younger age groups.
Sex	<p>Women are typically less represented than men in some of the types of employment provision that will be supported within the Plan (i.e. logistics / warehousing / industrial). The Local Plan encourages growth in these sectors, which could risk reinforcing occupational segregation.</p> <p>Whilst the Plan does not inherently create inequalities in terms of access to employment opportunities it may be beneficial to encourage engagement from potential occupiers/ employers with women to promote job opportunities in this sector. It is also noted that the majority of growth will be in the office sector, which includes a range of inclusive employment opportunities.</p> <p>Enhanced design and safety measures in town centres and improvements to public realm may particularly benefit women, especially in terms of creating safer and more inclusive places during day and night.</p>
Sexual orientation	The Local Plan is unlikely to have direct effects in relation to this characteristic. However, general improvements to community cohesion, urban design, and inclusive public spaces are likely to have indirect positive effects on creating welcoming, safe environments for LGBTQ+ people.
Disability	The Plan supports improved accessibility in housing, ensuring new homes meet M4(2) standards as a minimum, and the inclusion of M4(3) standards within a proportion of homes. Town centre and public realm policies aim to enhance walkability, inclusive design, and public transport access, supporting disabled people's mobility and access to services.
Marriage and civil partnership	The Plan is unlikely to generate direct effects or inequalities for this group. Housing and community policies may provide indirect benefits through the provision of family housing and inclusive neighbourhoods.
Pregnancy and maternity	While no policies are directly targeted at this group, indirect benefits are likely through improved walkable neighbourhoods, accessible green space, and housing standards, which support safe and healthy environments for parents and infants.

Protected Characteristics	Summary of impacts
Race	<p>Ethnic minority communities are concentrated in parts of North, Central, and East Manchester. The Local Plan supports regeneration and investment in these areas, which should improve access to housing, employment and high-quality public realm. Improved active travel and air quality in areas with higher levels of deprivation may deliver positive environmental justice outcomes. However, it is recognised that development in these areas could lead to community segregation effects, linked to the areas growing in terms of overall population . This could result in existing communities being marginalised or displaced.</p> <p>The Plan provides measures to avoid such impacts, but it will be beneficial to encourage / require more detailed equality and health assessments to support developments and monitor impacts on the ground.</p>
Religion and belief	<p>The Local Plan supports the provision of accessible and flexible community facilities, which could include places of worship. This is likely to have positive effects by retaining or enhancing local facilities that meet the needs of different religious groups, especially in diverse neighbourhoods across Manchester.</p>

## 7.9 Health and Wellbeing

**IA Objective** - *Improve the health and wellbeing of the population and reduce health inequalities.*

### **Spatial Principles and Strategic Growth Locations**

- 7.9.1 The overarching spatial strategy of the draft Plan includes a focus on health and wellbeing. This is demonstrated through Policy SP1 (Spatial Principles) by bringing forward leisure and cultural activity and essential social infrastructure within the Core Growth Area, as well as protecting green infrastructure that allows for recreational opportunities, and the focus on active travel opportunities. Additionally, development in all parts of the city will be required to make a positive contribution to the health, safety and wellbeing of all residents and consider the needs of the entire community, and increase access to health services and open spaces – as well as address health inequalities present across Manchester (Policy SP2: Development Principles). This is anticipated to bring forward positive effects in relation to health and wellbeing by ensuring key services and facilities that support physical and mental health are maintained and enhanced for everyone's benefit.
- 7.9.2 The strategic growth policies Policy SGL3 (Manchester City Centre) and Policy SGL3 (City Centre Areas) also make provisions for health and wellbeing. This is achieved through retaining, enhancing existing and constructing new health facilities to support the population of Manchester, especially within the city centre environment, as a result of key major healthcare facilities that are located there. Additionally, the provision of new green and blue infrastructure, and enhancements to the existing network, is also considered to have a benefit for physical and mental health – by safeguarding areas that allow for safe engagement with sports and community events. These measures are included within Policy SGL4 (Victoria North); and Policy SGL5 (Holt Town). Policies SGL4 and SGL 5 also intend to deliver new social and community infrastructure. Additionally, an increase in sports infrastructure is a focus for the development in the Sportcity area, which is anticipated to contribute to health and wellbeing through increased access to sports infrastructure (Policy SGL6: Sportcity).
- 7.9.3 Health and wellbeing are also specifically addressed through strategic policies linked to healthcare infrastructure. This includes redeveloping the North Manchester General Hospital so that it can deliver modernised health facilities for a wider community (Policy SGL9: North Manchester General Hospital), and redeveloping Wythenshawe Hospital to deliver a modern hospital and an expanded health village (Policy SGL11: Wythenshawe Hospital). The enhancement of these healthcare facilities is anticipated to bring forward positive effects for the population of Manchester by being able to deliver higher quality care.
- 7.9.4 It is recognised that a significant amount of development is anticipated to come forward within Manchester across the plan period, due to the overarching Places for Everyone Plan. It is possible that development could drive further health inequalities in Manchester, including (but not limited to) overcrowded housing, poor air quality, and reduced access to healthcare.

- 7.9.5 It is also noted that growth could bring forward negative impacts for health and wellbeing. Potential impacts, which tend to focus around increasing the density of development, include greater levels of noise, challenges for healthcare (prevention and control of disease), and management of crime due to potential conflicts within growing communities. However, it is considered that the Manchester Local Plan works well to mitigate this potential through the strategic growth areas, by enhancing existing healthcare services and facilities, encouraging active transport connectivity, and protecting and enhancing green spaces and infrastructure, and improving the public realm.
- 7.9.6 It is noted that none of the strategic growth area policies include a requirement for a health impact assessment. It is recommended that this stipulation is added in to ensure that development will not adversely impact upon the health and wellbeing of existing and new residents and visitors in Manchester.

### **Thematic policies**

- 7.9.7 The housing policies included in the Plan are likely to support the health and wellbeing of the Manchester population.
- A criteria-based policy is supportive of gypsy, traveller and travelling showpeople populations to provide for adequate pitches and parking alongside key infrastructure – including play amenities and key utilities such as water, rubbish and waste disposal, and electricity. Additionally, pitches will need to have access to local health services (Policy H3: Accommodation for Gypsies and Travellers and Travelling Showpeople). However, no specific sites are identified for allocation, and this brings a degree of uncertainty over whether suitable accommodation will be established. It is recommended that further evidence is gathered to establish needs and suitable allocations. It is understood that work is in hand to inform further evidence for a future iteration of the draft Local Plan.
- 7.9.8 The Plan also includes policies that deal with the provision of supported housing, as well as independent housing for older people and those with physical and learning disabilities (Policy H4: Supported Housing). This demonstrates that the Plan seeks to provide support for a range of people, and it is likely to have positive impact on reducing health inequalities.
- 7.9.9 Additionally, all proposals for new residential development will need to provide usable outside amenity space, and address existing and potential future deficiencies in physical, social or green infrastructure (Policy H7: Housing Design). This is anticipated to support health and wellbeing by promoting engagement with sport and community events, to the benefit of physical and mental health.
- 7.9.10 The safeguarding and enhancement of leisure facilities is also anticipated to promote improvements in health and wellbeing across Manchester. This is achieved through providing more facilities to engage in activities that promote physical and mental health including Policy C9 (Entertainment, leisure and Food and Drink Developments); and Policy C10 (Leisure and the Evening Economy).

- 7.9.11 The environment policies are also likely to have an impact on health and wellbeing. The primary benefits will result from protecting and enhancing the green and blue infrastructure network, including parks and recreational spaces and routes, as well as trees and woodlands set out in Policies EN1 (Strategic Green and Blue Infrastructure); EN2 (River Valleys and Waterways); EN3 (Trees and); EN4 (Biodiversity and Geodiversity); EN5 (Biodiversity Net Gain); EN6 (Urban Green Factor); and DM1 (Development Management).
- 7.9.12 This is anticipated to help enhance health and wellbeing through promoting active travel opportunities and increased access to recreational space, to allow for engagement with physical activity. This is also reiterated through the environmental policies helping to maintain and improve the quality of water and air, thus reducing the potential for health concerns linked to pollution that feature in Policy EN7 (Air Quality) and Policy EN8 (Water Quality).
- 7.9.13 Health and wellbeing are also anticipated to be impacted through retaining and enhancing existing and new open and recreational land (and facilities), which safeguards current and promotes increased levels of engagement with physical activity which are key matters dealt with in Policy SI1 (Protection of existing Open Space, Sport and Recreation land and facilities) and Policy SI2 (Provision of new Open Space, Sport and Recreation land and facilities).
- 7.9.14 Health and wellbeing are also considered through a focus on promoting active travel engagement – achieved through removing barriers to engagement with active travel opportunities, and contributing to various transport strategies and plans with a focus on walking, wheeling and cycling (Policy T1: Transport Principles) and (Policy T2: Sustainable location of development).
- 7.9.15 Employment is also anticipated to have an impact upon health and wellbeing. By ensuring that development supports employment levels and job growth in Manchester, the policies work to maintain mental health – by helping to reduce stress related to unemployment. Additionally, by ensuring the job market is enhanced and accessible, the wider plan policies also help to ensure engagement with services and facilities that support physical and mental health – such as engagement with therapy and counselling, access to medications, and access to leisure facilities.

### **Overall effects**

- 7.9.16 The Plan mainly works well to protect and enhance health and wellbeing. This is achieved through focusing on health infrastructure, strategic growth, and health considerations in residential and employment development. Enhancements are also likely to come forward through public realm improvements and through incorporating environmental considerations into development design, as this helps to encourage increased engagement with physical activity and community integration and interaction.
- 7.9.17 Overall, mixed effects are predicted for health and wellbeing across Manchester. This reflects the provisions of the plan policies that seek to maintain and enhance health and wellbeing, and the potential for **minor negative impacts** to come forward linked to increased development.

- 7.9.18 However, the level of growth is predetermined by the overarching Places for Everyone plan, and the Manchester Local Plan does well to mitigate potential adverse effects. Therefore, **moderate positive effects** are predicted too.

## 7.10 Flooding

**IA Objective** - *Reduce the risk of flooding to people and property.*

### **Spatial Principles and Strategic Growth Locations**

- 7.10.1 The overarching spatial strategy includes measures to reduce flood risk. This includes through the incorporation of green infrastructure across the city, including parks, which is likely to contribute towards flood risk management by increasing water interception and providing areas for water to accumulate away from housing and other important infrastructure (Policy SP1 (Spatial Principles)). The overall spatial strategy also includes the need to consider potential infrastructure requirements as a result of future population changes, which could include the construction of flood management infrastructure (Policy SP2: Development Principles). This is anticipated to support Places for Everyone policy JP-S4: Flood Risk and the Water Environment, which outlines the need to work with natural processes to slow and intercept water and locating and designing development to minimise the risk.
- 7.10.2 The City Centre has elevated fluvial flood risk within the north, west and south, associated with the River Irwell and the Bridgewater Canal. As such, much of the land adjacent to these waterways are within fluvial Flood Zone 2 and Flood Zone 3. Additionally, surface water flood risk is present across the area within the proposed City Centre boundary, with particular areas at risk along the waterways and around Peter Street northwards to Market Street. The associated policy makes provisions for flood risk by indicating development will need to incorporate sustainable urban drainage systems and reduce surface water flooding (Policy SGL2: Manchester City Centre), and as such works well to reduce flood risk across the area. It is also worth acknowledging that much of the land involved is previously developed, and historically has been built within areas at risk of flooding. Therefore, a balance needs to be made between regeneration and recognising the need to manage flood risk.
- 7.10.3 The Victoria North area overlaps with some areas of fluvial Flood Zone 2 and fluvial Flood Zone 3, which is largely associated with the River Irk and Moss Brook primarily in the north-western and northern extents of the area. Similar areas are at medium to high risk of surface water flooding, again linked to these waterways. Policy SGL4 indicates that development will need to consider the flood risk of the area and provide appropriate flood risk mitigation measures, with a focus on nature-based solutions. This, coupled with a focus on contributing an enhanced and extended green and blue infrastructure network, is considered likely to help reduce the risk of flooding in this area.
- 7.10.4 The Holt Town area experiences little flood risk; there is no overlap with fluvial flood risk, and there is limited surface water flood risk – largely isolated on the south-western area boundary.

- 7.10.5 The associated policy makes provisions for the low level of flood risk in the area, indicating development will need to deliver water management in line with a 'sponge city' approach – designing development to absorb, store and purify rainwater in a way that mimics natural processes.
- 7.10.6 This also includes the use of sustainable urban drainage systems (Policy SGL5 (Holt Town)). This should contribute positively in terms of net surface water run-off, thereby reducing flood risk.
- 7.10.7 The Sportscity area also experiences limited flood risk, with no overlap with fluvial flood zones. Whilst there is surface water flood risk across the area, this is largely associated with the car parking areas in the northern half of the area. It is considered that flood risk concerns will be addressed through the overarching spatial strategy set by this plan and the Places for Everyone policy JP-S4, as well as the wider policies of this plan. This could be achieved for example by introducing SUDs as part of development on surface car parks.
- 7.10.8 The Central Park area overlaps with fluvial Flood Zone 3 in its eastern extent, to the south of Northampton Road and the associated roundabout. Surface water flood risk is present across area, especially along Northampton Road and to the east of the Central Park Metrolink Station. It is considered that flood risk concerns will be addressed through the overarching spatial strategy set by this plan and the Places for Everyone policy JP-S4, as well as the wider policies of this plan.
- 7.10.9 The Strangeways area is likely to experience fluvial flood risk in the western extent, linked to River Irwell, evidenced by the overlap with fluvial Flood Zone 2 and Flood Zone 3. Additionally, surface water flood risk is likely to impact roads in this part of the area, including (but not limited to) Bury New Road, Derby Street, Broughton Street, Cheetwood Road and Sherborne Street. The associated policy (SGL8) makes provisions for this by outlining the need for development in areas at risk to remain in commercial use on the ground floor level, reducing the potential for flood risk to impact upon residential properties.
- 7.10.10 The North Manchester General Hospital area is adjacent to fluvial flood risk (Flood Zone 2) to the north, west and south-west – linked to the River Irk that is in proximity. Furthermore, surface water flood risk in the area is minimal, affecting parts of the southern area and Central Drive. It is considered that flood risk concerns will be addressed through the overarching spatial strategy set by this plan and the Places for Everyone policy JP-S4, as well as the wider policies of this plan.
- 7.10.11 The Wythenshawe Hospital site is unlikely to experience fluvial flood risk given it does not overlap with flood zones, but there is a risk of surface water flooding in the centre of the area as well as in the northern extent. There is also a smaller isolated area at risk of surface water flooding in the southern extent. The associated policy outlines the need for new development to incorporate sustainable urban drainage systems, to help reduce the risk of flooding across both areas (Policy SGL11: Wythenshawe Hospital).
- 7.10.12 Manchester airport is also unlikely to experience fluvial flood risk, as there is no overlap with flood zones 2 or 3. However, there is surface water flood risk across the area – typically smaller pockets of higher flood risk, with larger areas on the western and southern boundaries.



7.10.13 This is largely associated with the airport runways. Development proposals will need to consider flood risk through a comprehensive masterplan of the site ('Policy SGL12: MIX - Manchester Airport).

### **Thematic policies**

7.10.14 It is indicated that all development will need to consider flood risk and drainage through their associated proposals in Policy DM1 (Development Management). The approach requires that development proposals evaluate flood risk, and incorporate flood risk mitigation measures where possible, resulting in the likelihood that flooding is reduced.

7.10.15 The housing policies make provisions for flood risk in Manchester. New pitches for the gypsy and traveller communities will need to be large enough to provide for adequate drainage and will be required to be designed in accordance with the latest advice from the government and flood risk policy (Policy H3: Accommodation for Gypsies and Travellers and Travelling Showpeople). Additionally, housing design will need to consider potential flood risk within developable sites, to ensure new growth is not impacted by flooding or cause adverse flood effects elsewhere (for example, through increased surface run off) (Policy H7: Housing Design). This is anticipated to help reduce the impacts of flooding by avoiding areas at risk of flooding and implementing mitigation measures.

7.10.16 Policy EN9 relating to flood risk indicates that development will need to be focused on sites with little to no risk of flooding, taking into account all sources of flooding identified in recent supporting evidence. It also outlines the need for site specific Flood Risk Assessments to be created for all development proposals on sites greater than 0.5 hectares in size within Critical Drainage Areas and Canal Hazard Zones. This, alongside implementing sustainable urban drainage systems and integrating green infrastructure, is considered likely to bring forward positive effects in relation to flood risk.

7.10.17 Other environmental policies also include stipulations that link to flood risk mitigation. This includes through identifying, maintaining and enhancing existing green and blue infrastructure, and adding to the network where appropriate – which is anticipated to have a benefit for flood risk by safeguarding and increasing natural flood management set out in Policies EN1 (Strategic Green and Blue Infrastructure); EN3 (Trees and Woodlands); EN5 (Biodiversity Net Gain); and EN8 (Water Quality). Additionally, the incorporation of sustainable urban drainage systems in development is also anticipated to have a positive effect, by helping to reduce flood effects on development (Policy EN2: River Valleys and Waterways). The environmental policies also outline the need to consider urban greening – including permeable paving where possible, and the linking of sustainable urban drainage systems to green features (Policy EN6: Urban Green Factor). This is anticipated to have a positive effect in relation to flood risk by creating and enhancing a wider system to reduce the impacts of flooding.

## Overall effects

- 7.10.18 The Local Plan builds upon existing policy relating to flood risk management included in the Places for Everyone Plan, which primarily focuses on supporting an integrated catchment-based approach to managing flood risk. This includes working with natural processes and implementing sustainable urban drainage systems where appropriate.
- 7.10.19 The risk of flooding varies across Manchester, but it is considered that the overarching spatial strategy and site-specific policies work well to mitigate this risk. This is achieved through focusing development away from areas at higher risk of flooding, maintaining and enhancing green and blue infrastructure, and implementing sustainable urban drainage systems where appropriate.
- 7.10.20 The wider policies reinforce this strategy and will further help to mitigate flood risk across Manchester. This is primarily achieved through the focus on green and blue infrastructure provision, as well as design stipulations and the need to reflect local policy and evidence documents.
- 7.10.21 Overall, **moderate positive effects** are predicted. This is due to the focus on reducing flood risk in Manchester through developing areas at lower risk and implementing design stipulations that will help to increase water interception.

## 7.11 Water quality

**IA Objective** - *Protect and improve the quality of, availability and sustainable access to water resources.*

### **Spatial Principles and Strategic Growth Locations**

- 7.11.1 Water quality is a key consideration of the spatial strategy. Across the City Centre, there are a number of waterbodies – including the River Medlock, the Rochdale Canal, the Bridgewater Canal and the Ashton Canal. Additionally, the River Irwell is adjacent to the city boundary on its north-western and western boundaries. Furthermore, the southern extent of the city area overlaps with source protection zones, for inner, outer, and total catchment protection. Within the City Centre, Policy SGL2 (Manchester City Centre) requires that development proposals will need to consider waterways, canals and rivers and how the scale, massing, design, density and form of development could impact upon their quality. This is anticipated to support Places for Everyone policy JP-S4 'Flood Risk and the Water Environment', and JP-G3 'River Valleys and Waterways', which outlines the need for development to protect and enhance the quantity and quality of water bodies.
- 7.11.2 The River Irk and the Moss Brook intersect the Victoria North area (Policy SGL4). Water quality in the area is considered through ensuring development considers flood risk, and green and blue infrastructure is maintained and enhanced.
- 7.11.3 The Ashton Canal intersects Holt Town. It is anticipated that growth in this area will adopt a 'sponge city' approach, so that development can absorb, store and purify rainwater in a way that mimics natural processes (Policy SGL5: Holt Town).
- 7.11.4 The Sportscity area overlaps with the River Medlock watercourse, and the Ashton Canal also intersects the site. Policy SGL6 (Sportscity) makes provisions for protecting water quality by seeking growth that safeguards the watercourses that travel through and within proximity to the area's boundaries.
- 7.11.5 Policies SGL7 (Central Park), SGL8 (Strangeways), and SGL9 (North Manchester General Hospital) are within areas that do not have waterbodies intersecting their boundaries, and as such their associated policies make no stipulations in relation to water quality. It is anticipated that potential impacts to water quality will be mitigated through the overall spatial strategy policies, specific environmental policies, and Places for Everyone policies JP-S4 and JP-G3. However, it is noted that the inclusion of green infrastructure improvements and the focus on high quality design within the policies are likely to positively contribute to maintaining water quality in the associated areas.
- 7.11.6 Policies SGL10 (Wythenshawe Centre and Adjacent Areas) and SGL11 (Wythenshawe Hospital) do not make specific provisions for water quality. They do require that green infrastructure and public realm improvements are undertaken – which is likely to help contribute to maintaining water quality through reducing the potential for pollutants to enter the water system.

- 7.11.7 The same can be said of the Manchester airport area; whilst it is in proximity to Cotteril Clough Brook, located to the south, the associated site policies do not make specific provision for water quality, but have a focus on bringing forward green infrastructure enhancement and public realm improvements (Policy SGL12: MIX - Manchester Airport) and (Policy SGL13: Manchester Airport Strategic Site).
- 7.11.8 A key factor that contributes towards water quality within Manchester (and downstream) is the treatment of wastewater. United Utilities has invested in wastewater treatment works that serve Manchester, which has led to an improvement in water quality. However, there are still major pollution issues in the area, which could be exacerbated by increased development. In United Utilities Drainage and Wastewater Management Plan (2023), it is indicated that a number of wastewater treatment works are expected to deteriorate over the plan period. There is an assumption that these issues will need to be addressed to service growth associated with the PfE and Manchester Local Plan, but without confirmation uncertainties around these effects must be noted.

### **Thematic policies**

- 7.11.9 Water quality is considered through the policy provisions of the plan. This includes a specific policy related to water quality, which seeks to ensure development avoids adverse impacts during construction, and enhances the chemical and ecological statuses of waterbodies across Manchester. It also seeks the reduction in surface water runoff from development, the minimisation of groundwater contamination, and the avoidance of pollutants entering the water system (Policy EN8: Water Quality).
- 7.11.10 Additionally, water quality is further considered in the Plan through ensuring development within or adjacent to river valleys or canal corridors assesses potential impacts on the waterbodies, in order to maintain and enhance quality (Policy EN9: Flood Risk). The Plan also includes providing specific stipulations for the Mersey Valley, Irk Valley and Moston Brook Corridors, Medlock Valley, River Irwell, and Rochdale, Ashton and Bridgewater Canals (Policy EN2: River Valleys and Waterways).
- 7.11.11 In other environmental policies provision is also made for water quality. The watercourses are identified as important components of the green-blue infrastructure network, and it is stipulated that development will need to maintain and enhance existing infrastructure in line with relevant policies (Policy EN1: Strategic Green and Blue Infrastructure) and Policy DM1 (Development Management). Additionally, long-term management and maintenance measures for any proposed infrastructure will need to be put in place (Policy EN1: Strategic Green and Blue Infrastructure). This is anticipated to maintain and improve water quality by ensuring watercourses are not negatively impacted through development.
- 7.11.12 The enhancement of the wider natural environment, including the protection and enhancement of trees and woodland areas (Policy EN3: Trees and Woodlands) and important sites for biodiversity and geodiversity (Policy EN4: Biodiversity and Geodiversity); Policy EN5 (Biodiversity Net Gain) is anticipated to contribute to maintaining and enhancing water quality through protecting natural ecosystem processes that impact upon the water cycle.

7.11.13 The use of permeable paving through development is also likely to reduce the potential for pollutants to enter the water system through surface water runoff (Policy EN6: Urban Green Factor).

#### **Overall effects**

7.11.14 The policies in the Local Plan complement the wider strategic planning context set by the Places for Everyone Plan, which seeks to safeguard water quality and quantity.

7.11.15 Water quality is a consideration for the overarching spatial strategy in Manchester and is incorporated into the individual site/location policies where appropriate. This is considered a positive effect, as it ensures that water quality is maintained and enhanced in ways that are appropriate to the different areas.

7.11.16 Water quality is also maintained and enhanced through the wider plan policies, which seek to protect green and blue infrastructure across Manchester and provide stipulations for development in the identified valleys and canal corridors.

7.11.17 At this time, **a potential minor positive effect** is predicted. On one hand, there is a focus on protecting river valleys and canal corridors and safeguarding wider green and blue infrastructure that contribute to natural processes that influence water quality. This is likely to have positive effects upon water quality. However, there is some uncertainty around the potential for development to impact upon the capacity of water treatment works where further investment is likely to be required.

## 7.12 Air quality

**IA Objective** - *Improve air quality and reduce the impact on human health.*

### **Spatial Principles and Strategic Growth Locations**

- 7.12.1 Whilst the wider spatial strategy does not make specific provisions in relation to air quality, the focus on safeguarding and enhancing green infrastructure and promoting engagement with active and sustainable transportation opportunities is anticipated to bring forward a level of positive effects. This is through reduced vehicular pollutants being released, and increased pollutant absorption (Policy SP1: Spatial Principles). It is also considered that policies relating to air quality in the Places for Everyone Plan, including policy JP-S5 'Clean Air', will have a positive impact on development proposals so that air quality is improved, especially in residential areas, in proximity to the green infrastructure network, and where targets are not being met.
- 7.12.2 The focus on active and sustainable travel opportunities and green infrastructure provision is reiterated through the strategic growth location policies, which are also anticipated to have a positive effect on air quality. Again, this is likely to be achieved through increased pollutant absorption, and reduced pollutant emissions associated with private vehicle usage.
- 7.12.3 Furthermore, growth at Manchester Airport will be required to demonstrate that the number of people affected by atmospheric pollution is minimised, and the extent of impacts should be mitigated (Policy SGL13: Manchester Airport Strategic Site). This is anticipated to have a positive impact on air quality.
- 7.12.4 An increase in new homes in the city potentially brings a greater amount of people into contact with areas of poorer air quality. It will also likely generate a greater amount of transport movements, but these are likely to be by active or sustainable modes of travel given the excellent levels of accessibility in the city. Therefore, negative effects in terms of air quality are predicted to be minor. It is also worth acknowledging that the scale and distribution of development is largely determined through the Places for Everyone Plan. Therefore, significant levels of growth in this area are already established.

### **Thematic policies**

- 7.12.5 The Local Plan includes a specific policy on air quality - outlining the need for developers to take measures to minimise and mitigate the local impact of emissions (Policy EN7: Air Quality). Linked to this, the wider environmental policies are considered likely to have a positive impact upon air quality. This includes through the protection and enhancement of green and blue infrastructure in terms of its quality, quantity and multifunctionality set out in Policies EN1 (Strategic Green and Blue Infrastructure); EN3 (Trees and Woodlands); EN4 (Biodiversity and Geodiversity); EN5 (Biodiversity Net Gain); and EN6 (Urban Green Factor). This helps to ensure the level of photosynthesis is maintained and improved through development, which in turn helps to ensure air quality is safeguarded and enhanced.

- 7.12.6 The transport policies support a shift from private vehicles to engagement with public transport, shared mobility and active travel opportunities – by ensuring development is located in areas with good access to high quality and frequent public and active travel (Policy T1: Transport Principles); (Policy T2: Sustainable location of development); and (Policy T3: Infrastructure Investment). This is anticipated to help reduce air pollutants linked to transport by making sustainable and active travel opportunities more viable alternatives to private vehicle usage, which is anticipated to benefit air quality.

#### **Overall effects**

- 7.12.7 Whilst the overarching spatial strategy does not make specific stipulations relating to air quality, the Local Plan is supportive of the air quality objectives outlined in the Places for Everyone Plan.
- 7.12.8 Given the focus of the plan to bring forward new residential and employment development, it is possible negative effects in relation to air quality could come forward – linked to an intensification of land use. However, it is important to acknowledge that the spatial strategy and key growth locations are largely guided by the PfE.
- 7.12.9 The development areas identified through the Local Plan all make provisions relating to air quality, largely linked to bringing forward green infrastructure and promoting active and sustainable travel opportunities. This is reiterated through the wider plan policies, which also focus on bringing forward improvements to transport infrastructure and green and blue infrastructure.
- 7.12.10 On balance, **neutral effects** are predicted as it is expected that potential negative effects associated with growth will be offset by proactive approaches to air quality management.

## 7.13 Climate change

**IA Objective** - *Reduce greenhouse gas emissions and improve resilience to climate change.*

### **Spatial Principles and Strategic Growth Locations**

- 7.13.1 The Plan will facilitate growth in housing, employment and transportation (including road, rail and air travel), which all contribute both directly and indirectly towards an increase in carbon emissions. Though the framework for growth (amount and the broad distribution) is set by the Places for Everyone Plan, the Manchester Local Plan could still influence how this growth is delivered and therefore have an influence on the ability to achieve climate change targets for Manchester.
- 7.13.2 Broadly speaking, the measures within the Local Plan are likely to facilitate the achievement of carbon emissions reductions, rather than to make the situation worse. There are several important factors, notably a focus on the enhancement of green infrastructure, support for low carbon energy schemes, facilitating a shift to public transport, walking and accessible growth, and encouraging higher sustainability standards in new development.
- 7.13.3 The provision of new housing, employment and industry space across the plan period will need to be supported by appropriate levels of infrastructure, including renewable energy (Policy SGL1: Strategic Growth Locations). This shift towards renewable energy sources is likely to help reduce carbon emissions linked to an increase in activity in the area. Additionally, by defining the City Centre area and encouraging the majority of new growth to come forward within the limits, the plan works to locate development in the most sustainable locations in relation to existing infrastructure (Policy SGL2: Manchester City Centre). Again, this is anticipated to help reduce carbon emissions by limiting the need to use private vehicles to access important infrastructure. Furthermore, the overarching spatial strategy outlines the intention for Manchester as a city to be net-zero carbon by 2038 (Policy SP2: Development Principles). Policy SGL2 (Manchester City Centre) indicates it will support proposals that will deliver energy efficient development and utilises renewable and low carbon energy. This is also anticipated to help reduce carbon emissions linked to an increase in the built footprint of the city centre environment and would support the sustainable and resilient places policies included in the Places for Everyone Plan, particularly policies JP-S1 'Sustainable Development', and JP-S2 'Carbon and Energy'.
- 7.13.4 All the strategic location policies include stipulations relating to bringing forward green infrastructure and promoting active and sustainable travel opportunities. This is anticipated to aid in reducing carbon emissions released across these areas, by offering viable alternatives to private vehicles (thus reducing the number of vehicles on the road network) and protecting and enhancing carbon capture and storage capabilities.
- 7.13.5 The protection and enhancement of green infrastructure can also help to sequester carbon emissions and/ or prevent the loss of carbon sinks, which will further help to manage climate change (both mitigation and enhancement).



- 7.13.6 Manchester Airport is recognised as a major source of carbon and greenhouse gas emissions. This is largely linked to flight activity and supporting industries (i.e., transport to and from the airport, services and facilities, freight, and businesses). Growth at Manchester Airport is set by national policy, and given this and typical consumer behaviours, it is anticipated that emissions originating from the area will increase. However, it is recognised that the Manchester Local Plan does seek to reduce emissions where it can. This is achieved through seeking improved sustainable transport access to and from the area, to help reduce reliance on private transportation, and the incorporation of urban greening. Whilst there is support for aviation expansion, national policy has the intention to facilitate more sustainable air travel through seeking the use of sustainable fuel. Currently, policies work to bring forward a level of mitigation. However, mitigation could be strengthened by committing to accelerated decarbonisation at the airport – for example, by committing to managing existing and future parking facilities at the airport that reduce the need for such provisions (in order to promote a greater uptake in sustainable transportation engagement), and including the need for high design standards for aviation supporting or reliant sectors.
- 7.13.7 It is anticipated that there will be low embodied carbon impacts through the spatial policies; though there will still be a need for groundwork and new materials to support growth, the approach heavily promotes reuse of buildings and land. There are likely to be high impacts in relation to operational emissions, due to increased demand for energy and the support of employment growth increasing emissions linked to business and leisure activities, especially associated with Manchester Airport. There is limited space for significant sequestration activities, however the focus on protecting and enhancing green and blue infrastructure could present some opportunities. Green and blue infrastructure protection could contribute to climate change resilience as well, though it is noted that growth it likely to increase the urban heat index.
- 7.13.8 Overall, the strategic growth policies are considered to have a mixed contribution to climate change objectives. It is recognised that the level of growth and the overarching strategy is predetermined by the Places for Everyone Plan, and so greenhouse gas emissions and climate change resilience measures will be implemented with or without the Manchester Local Plan in place. Whilst the strategy and growth activities are likely to facilitate further emissions from transport (including air travel), there are overriding policies at Greater Manchester and national level that are driving this growth. The Manchester Local Plan helps to offset further ‘Scope 3’ emissions by focusing on sustainable modes of transport, supporting ‘green industries’ and locating growth in accessible areas. This strategy gives the city a chance to work towards its carbon budget and resilience objectives but is not sufficient alone to ensure that targets will be met with a complementary need for national policies to contribute to the management of carbon emissions.

## **Thematic policies**

- 7.13.9 The Local Plan makes provisions for climate change through a number of climate focused policies. This includes ensuring proposal designs support sustainable development – including (but not limited to) the reuse of existing structures where possible and building to specified BREEAM standards (Policy ZC1: Sustainable Design and Construction). Additionally, development will be expected to achieve net-zero carbon, through promoting a reduction in energy demand, an increase in renewable energy use, and carbon offsetting (Policy ZC2: Towards Zero Carbon); and (Policy D1: Design Principles). The construction of renewable energy infrastructure is also supported through the Plan (Policy ZC3: Renewable and Low Carbon Energy Developments), as are district heating networks (Policy ZC4: Heat Networks). These stipulations are anticipated to bring forward positive effects in relation to climate change by reducing emissions linked to the construction and lifetime use of new development.
- 7.13.10 The wider environmental policies are also anticipated to have effects on the climate change objectives. This is through the focus on maintaining and enhancing green and blue infrastructure, which is anticipated to contribute to reducing emissions through safeguarding and increasing levels of carbon capture and storage achieved through Policy EN1 (Strategic Green and Blue Infrastructure); Policy EN3 (Trees and Woodland); Policy EN4 (Biodiversity and Geodiversity); and Policy EN5 (Biodiversity Net Gain). It also reflects the focus of the environmental policies on improving access and the creation of walking and cycling routes, which will provide greater opportunities to engage in active travel, which could help reduce the number of vehicles on the road and their associated emissions (Policy EN2: River Valleys and Waterways); and (Policy EN7: Air Quality). Policies that encourage urban cooling are also likely to help reduce the demand for mechanical cooling in buildings (and associated carbon reductions over the lifetime of developments).
- 7.13.11 The transport policies are also anticipated to have a positive effect in relation to climate change mitigation, by encouraging a modal shift from private vehicles to public transport and active travel and contributing to zero carbon through promoting a reduction in emissions (Policy T1: Transport Principles). This is likely to be supported by focusing development within proximity to convenient, frequent and high-quality public transport and active travel opportunities (Policy T2: Sustainable location of development).
- 7.13.12 The thematic policies have a more limited effect on embodied carbon. Whilst there are greening measures required, these are unlikely to have a significant impact, and some policies could go further to lower embodied carbon. Though there is reference to whole life cycle assessments, there is no mandatory requirement or standards in place to drive significant emissions reductions during construction – this is still very much an emerging area in terms of the understanding of potential technical solutions.
- 7.13.13 In relation to operational emissions, the policies will help with a level of reduction, but this is not anticipated to be significant. A focus on viability, dwelling numbers and challenging affordable housing targets could mean that standards may not be brought in as quickly and highly as encouraged, resulting in slower decarbonisation of the built environment.

7.13.14 Carbon sequestration opportunities are largely left undiscussed by the thematic policies, with the exception of stipulations relating to urban greening and the protection and enhancement of green and blue infrastructure.

#### **Overall effects**

7.13.15 With regards to climate change, the Local Plan is complementary of policies set out within the Places for Everyone Plan – demonstrated through focusing development on sustainable locations and delivering enhancements to supporting infrastructure.

7.13.16 The development areas identified through the Local Plan all make provisions relating to climate change, related to bringing forward green infrastructure and promoting active and sustainable travel opportunities. However, given they seek to bring forward additional growth, they are likely to increase greenhouse gas emissions at construction and / or operational stages. This is especially true of the Manchester Airport development, which is anticipated to increase carbon and greenhouse gas emissions. Whilst growth is set by national policy and the increase is largely unavoidable, the Manchester Local Plan works well to reduce the potential for adverse impacts and incorporates mitigation measures.

7.13.17 The wider Local Plan policies are supportive of climate change mitigation, demonstrated through the focus on renewable energy infrastructure, low carbon development, encouraging active and sustainable travel engagement, and natural environment enhancements. This is likely to help reduce carbon emissions associated with development and the existing built environment.

7.13.18 On balance, **minor positive effects** are predicted.

## 7.14 Travel and Transport

**IA Objective** - *Reduce the need to travel and promote sustainable and active modes of transport.*

### **Spatial Principles and Strategic Growth Locations**

- 7.14.1 There is a focus on travel and transport through the overarching spatial strategy for Manchester. A key spatial principle is for new development to maximise the potential of transport infrastructure, with a focus on walking, cycling, and public transport (Policy SP1: Spatial Principles), as well as locating development in areas to reduce the need to travel and provide good access to sustainable transport provision (Policy SP2: Development Principles). Additionally, the strategic growth location policies seek to ensure development is supported by appropriate public transport infrastructure (Policy SGL1: Strategic Growth Locations). This supports policies included in the Places for Everyone Plan, including JP-C3 'Public Transport'; JP-C4 'The Strategic Road Network'; JP-C5 'Streets for All'; JP-C6 'Walking and Cycling'; JP-C7 'Freight and Logistics'; and JP-C8 'Transport Requirements of New Development'.
- 7.14.2 The strategic growth location policies make provisions for travel and transport. This is achieved through ensuring development in the City Centre is of an appropriate scale, density and form so that it does not impact adversely on transport infrastructure. A focus on high density development in the City Centre is positive in relation to transport as it allows greater access to public transport and helps to support the viability of services. There is also a need to make provisions for Northern Powerhouse Rail, increase rail capacity and enhance rail infrastructure, and make provision for sustainable public transport and highway improvements (Policy SGL2: Manchester City Centre). This focus is reiterated for regeneration and major development in the Piccadilly, Mayfield, and Central Business District and Civic Quarter neighbourhoods (Policy SGL3: City Centre Areas).
- 7.14.3 Beyond the City Centre, the remaining strategic growth locations also include provisions for travel and transport – indicating that development will need to provide connections between neighbourhoods, enhance pedestrian and cycle connections, and enhance sustainable and public transportation opportunities as well as highways infrastructure. As such, it is anticipated that strategic growth in Manchester will contribute well to travel and transportation by ensuring development does not compromise the existing transport network, and provides viable and accessible alternatives to private vehicle usage. This is important, given an increase in residential and employment growth could result in an increase in the number of vehicle trips across Manchester.

### **Thematic policies**

- 7.14.4 The Local Plan includes specific transport policies, outlining how development proposals will need to consider and enhance public and sustainable transport infrastructure and opportunities. This includes contributing positively towards the Greater Manchester Transport Strategy 2040, the City Centre Transport Strategy 2040, and the Manchester Active Travel Strategy and Investment Plan to deliver a greater shift to public transport, shared mobility and active travel (Policy T1: Transport Principles).

- 7.14.5 The transport aspects of the Local Plan also includes ensuring development is located to encourage public and active travel usage, and is easily accessible on foot and through cycling. (Policy T2: Sustainable location of development). It also outlines the support of proposals that contribute to an integrated transport network, including Northern Powerhouse Rail, City Centre Bus and the Streets for All Connectivity Programme, and enhancing the Metrolink capacity (Policy T3: Infrastructure Investment). This is anticipated to bring forward positive effects in relation to travel and transportation in Manchester.
- 7.14.6 The environmental policies also include elements that have a travel and transport focus and will further contribute towards positive effects upon travel and transport objectives. This is achieved through ensuring development protects (and extends and enhances, where appropriate) strategic recreational routes along canals, railways and adjacent transport corridors, to encourage connectivity and a continued level of active travel (Policy EN1: Strategic Green and Blue Infrastructure) and (Policy EN2: River Valleys and Waterways). Additionally, development proposals will need to consider how to implement sustainable waste and mineral transportation, linked to material movements to support growth – including rail freight opportunities (Policy EN11: Waste) and (Policy EN12: Minerals). In this way, the Local Plan acknowledges the need to engage with sustainable modes of transport where possible, to help reduce environmental impacts.
- 7.14.7 The design management policies also include stipulations relating to travel and transport. This includes ensuring development considers the effects it could have on road safety and traffic generation, and includes appropriate vehicular access and car parking within the proposal design (Policy DM1 :Development Management). It also includes ensuring that car parking provision is adequate and does not increase pressure on parking facilities and the local road network (Policy DM3: Flat Conversions). The design quality and heritage policies are also anticipated to have impacts on transportation and travel. This is through ensuring that development considers transport network connectivity, encourages active travel where feasible, and offers solutions for car parking and cycle parking (Policy D1: Design Principles). This is also achieved through ensuring development includes appropriate measures to create an attractive, pedestrian friendly local environment (Policy D3: Tall Buildings).
- 7.14.8 Some of the wider Local Plan policies are also considered likely to have impacts on travel and transportation. This includes through minimising the need to travel and encouraging active and public modes of transportation where possible (Policy ZC1: Sustainable Design and Construction).
- 7.14.9 The Plan also includes policies that work to define a centre hierarchy – which helps to focus appropriate levels of development within Manchester City Centre, District Centres and Local Centres, and outlines the necessary infrastructure to support their vitality, including transportation infrastructure. This will help to make sure centres can be accessed through active and sustainable modes of transportation, and highways infrastructure is maintained and enhanced (Policy C1 to Policy C9).

## Overall effects

- 7.14.10 Overall, mixed effects are predicted with regards to the transport and travel objectives. There is significant housing and employment growth, which has the potential to increase the number of vehicles on the road network in Manchester - associated with a greater number of vehicles travelling within and through the area. This has the potential to impact upon the road network, for example through increasing the effects of congestion. An increase in people living and working in the City is also likely to put greater demand on public transport services, which could affect capacity.
- 7.14.11 It is noted that the growth strategy in Manchester is set by the Places for Everyone Local Plan. To help reduce potential negative impacts of growth in Manchester linked to this overarching strategic growth, the Local Plan has a focus on supporting sustainable and active transportation opportunities, and growth provides opportunities to enhance infrastructure and to promote greater levels of walking and cycling and public transport improvements. A range of policies support these aims including specific growth strategy policies, which include stipulations relating to travel and access to and from the development areas, as well as the wider plan policies.
- 7.14.12 On balance, **minor positive effects** are predicted.

## 7.15 Use of resources

**IA Objective** - *Protect natural finite resources, minimise waste and promote the efficient use of energy and materials.*

### **Spatial Principles and Strategic Growth Locations**

- 7.15.1 The use of materials is a key consideration of the overall spatial strategy, which indicates that development proposals should ensure the efficient use of natural resources wherever possible (Policy SP2: Development Principles). This will help to ensure that only the necessary materials are used, thus helping to safeguard resources and materials for the future. The use of materials is further considered by the overall spatial strategy through the encouragement of increased engagement with active and sustainable travel opportunities (Policy SP1: Spatial Principles), which is likely to lead to a shift away from conventional fuel vehicles. This is in line with Places for Everyone policy JP-S6 'Resource Efficiency'.
- 7.15.2 Active and sustainable travel uptake is reiterated through all of the strategic growth location policies, given their focus on encouraging engagement with and improvements to sustainable and active travel networks, including rail. Again, this is considered likely to contribute to the efficient use of materials, through a potential reduction in the use of conventional fuel vehicles. The use of materials and resources are considered through the wider policies of the Local Plan.
- 7.15.3 The spatial strategy promotes significant reuse of land and buildings, which will help to reduce demand for raw materials. High-density development also presents good opportunities to deliver energy efficient development and to incorporate district energy schemes.

### **Thematic policies**

- 7.15.4 The zero carbon and resilience policies are anticipated to have an impact on the use of materials. This is through encouraging the reuse and / or refurbishment of existing buildings where appropriate, which reduces the need for new raw materials, and ensuring the efficient use of natural resources and materials where new materials are necessary (Policy ZC1: Sustainable Design and Construction).
- 7.15.5 Development is also expected to bring forward a reduction in energy demand (i.e., minimisation of demand for heating, cooling, hot water, light and power), incorporate renewable and low carbon energy infrastructure, and engage with carbon offsetting opportunities where carbon reductions onsite are not sufficient (Policy ZC2: Towards Zero Carbon) and (Policy ZC3: Renewable and Low Carbon Energy Developments). This is anticipated to help reduce energy use, increase energy efficiency, and promote a proactive reduction in greenhouse gas emissions.
- 7.15.6 Furthermore, there is a focus on incorporating the installation of electric vehicle charging points where appropriate (Policy ZC1: Sustainable Design and Construction), to support electric vehicle usage.

7.15.7 Wider policies also have stipulations relating to the use of materials. This includes considering how waste is disposed of in relation to the waste hierarchy and the safeguarding and enhancement of waste infrastructure (Policy EN11: Waste), the safeguarding and efficient use of mineral resources (including the promotion of using secondary and recycled aggregates) (Policy EN12: Minerals), and the support of public and active travel opportunities which is anticipated to reduce the number of conventional fuel vehicles on the road network (Policy T1: Transport Principles).

#### **Overall effects**

7.15.8 The Local Plan policies build upon the Places for Everyone Plan by supporting efficient use of land and buildings, promoting energy efficiency and safeguarding important waste and minerals infrastructure. There is also a focus on promoting active and sustainable travel opportunities (reducing fuel consumption) and supporting a switch to electric vehicles. Overall, **minor positive effects** are predicted.



## 7.16 Heritage

**IA Objective** - *Protect, conserve and enhance the historic environment, reflecting Manchester's industrial, cultural and natural heritage.*

### **Spatial Principles and Strategic Growth Locations**

- 7.16.1 The plan has a focus on protecting and enhancing the built and natural environment (Policy SP2: Development Principles). In this way, it is anticipated that development in all parts of the City could bring forward positive effects in relation to heritage assets, areas and features, by ensuring structures themselves and their wider environment are maintained and enhanced through growth. This is considered likely to contribute towards maintaining the setting and significance of the historic environment in Manchester and is supportive of the Places for Everyone policy JP:P2 'Heritage'.
- 7.16.2 Heritage in Manchester is considered through the relevant strategic growth locations policies. Heritage assets and their settings are identified as important contributors to the built environment, especially given the presence of numerous listed buildings and conservation areas. It is outlined that development will need to take appropriate account of designated and non-designated heritage assets, areas and features in their associated design proposals, especially in relation to the City Centre (Policy SGL2: Manchester City Centre) and (Policy SGL3: City Centre Areas).
- 7.16.3 The Victoria North strategic growth area is adjacent to two conservation areas – Ancoats and Smithfields. Additionally, the area is within proximity to the Queens Park registered park and garden. Victoria North contains a number of listed buildings, including (but not limited to) the Grade II Marble Arch Inn and Grade II Roman Catholic Church of St Patrick. Regeneration within and around Victoria North has been beneficial for the historic environment through enhancing the historic setting, and this is anticipated to be furthered through additional growth. This is due to the focus on retaining and reusing existing buildings and structures.
- 7.16.4 The Holt Town strategic growth area also has a number of listed structures within its area boundaries, including Grade II Brunswick Mill, which is in poor condition. Whilst the associated strategic growth policy does not make specific stipulations relating to heritage, development will sit within the Holt Town Neighbourhood Development Framework, which focuses on enhancing the existing built environment and supporting heritage-led regeneration. This allows for responsive development that can preserve and enhance heritage whilst still allowing for sustainable growth.
- 7.16.5 The Strangeways strategic growth area has a number of designated heritage features, especially along Cheetham Hill Road. Additionally, the area has the Manchester Jewish Museum within its boundaries, which is Grade II\* listed. Whilst designated heritage assets are unlikely to be lost through development, their settings are likely to change. The effect of this is uncertain; it is possible development and regeneration could improve the surrounding built environment and its contribution to the setting, but different types of development could have differing impacts.

- 7.16.6 It is recommended that lower rise development is brought forward adjacent and within close proximity to designated heritage features, to avoid visually dominating development detracting from the significance of important structures.
- 7.16.7 Additionally, the prison within the Strangeways strategic growth area would likely need to be relocated, which would lead to significant regeneration activity. This could lead to changes to the character of the area and the prison structure itself, though it is noted that it is in a level of disrepair. Whilst it is not included on the Heritage At Risk Register, the prison structure is ageing and under pressure.
- 7.16.8 Within the Oxford Road Corridor area, it is outlined that listed buildings and non-designated heritage assets will be expected to inform the design of proposals, including the layout and the public realm. This is also likely for the St John's and Enterprise City area, where there are a number of designated and non-designated heritage assets – including Castlefield Conservation Area. Furthermore, growth in the Central Business District and Civic Quarter and the St Mary's Parsonage area is also expected to enhance associated historic buildings, which is anticipated to help contribute to protecting the historic character and quality of the areas (Policy SGL3: City Centre Areas).
- 7.16.9 Development at the airport and specifically Policy SGL12 (MIX – Manchester Airport) will bring forward development within proximity to the listed Etrop Grange; a Grade II hotel building. It is considered that the setting of this designated heritage asset has already been altered by airport development and associated growth, and as such development through the strategic growth policy is unlikely to impact upon its setting and significance. This is especially true given that the land earmarked for development does not contribute to the features setting.
- 7.16.10 More generally, developments at the Manchester Airport Strategic Site will be in an area that overlaps with three listed buildings. This includes Cloughbank Farmhouse, Rose Cottage, and Haletop Farm. The potential for development to impact upon these listed features is considered to be low, given that these designated assets are within an already developed area. As such, if their immediate settings and surroundings are protected through development, it is likely that the significance of these listed buildings will be maintained. To help mitigate any potential effects, it is stipulated that development design will need to take appropriate account of heritage assets and their setting. This is anticipated to positively contribute to heritage by ensuring character and quality are maintained (Policy SGL13: Manchester Airport Strategic Site).

### **Thematic policies**

- 7.16.11 The housing policies consider the historic environment and heritage assets, areas and features. This includes through encouraging development proposals to contribute to the re-use of listed structures and non-designated, locally important buildings with particular heritage value (Policy H5: Purpose Built Student Accommodation).

- 7.16.12 Additionally, proposals for new residential development will be expected to contribute to the character of the local area and take account of any environmental constraints on a site's development – this will include designated heritage assets, areas and features (Policy H7: Housing Design). These policies are anticipated to contribute positively towards maintaining and enhancing heritage by preventing important structures from falling into disrepair through a lack of use, and protecting the setting and significance of specific heritage assets, areas and features.
- 7.16.13 The development management policies also include points that cover heritage matters. This is achieved through ensuring development fully regards the surrounding area and its character, as well as potential effects relating to archaeological or built heritage (Policy DM1: Development Management). It also includes extensions to domestic houses, flats and apartment buildings (Policy DM2: Residential Extensions) and the conversion of properties into flats (Policy DM3: Flat Conversions), which further indicates planning applications should have regard to the general character of the property and surrounding neighbourhood. This also applies to shop fronts – which need to be of a proportion, scale, style, level of detail, colouring and material that enhances heritage assets, especially conservation areas and listed buildings. This is anticipated to help protect the setting of historic assets, areas and features, which helps to maintain their significance and their contribution to the historic environment.
- 7.16.14 The design and heritage policies by definition have a strong heritage focus. This is achieved through ensuring local character and context are reflected in development, including through the use of high quality materials and details, which is anticipated to help maintain and enhance historic setting and significance (Policy D1 :Design Principles). It is also achieved through outlining the distinct character areas of the city and indicating what kinds of development would be appropriate within them, to ensure growth is considerate of their contribution to character quality (Policy D2: Character Areas). Specific heritage aspects are then covered by policies D4: Conservation Areas, Listed Buildings, and Registered Parks and Gardens) and D5: Heritage).

### **Overall effects**

- 7.16.15 The overarching spatial strategy of the Local Plan presents opportunities for positive effects to come forward in relation to heritage. This reflects the focus of growth within areas with rich heritage considerations, and the wider historic setting of the city of Manchester. However, given heritage is considered through the site allocation policies and the wider spatial strategy, and the overarching Places for People Plan, it is likely negative effects can be reduced or avoided entirely.
- 7.16.16 Additionally, the Local Plan policies have a great focus on supporting public realm improvements and maintaining and enhancing natural features – which is likely to bring forward positive effects through safeguarding and improving historic settings.

7.16.17 Overall, the Local Plan is predicted to have **major positive effects**, given it supports measures to protect and enhance heritage assets, features and areas – and their wider setting. It is noted that some **minor negative effects** could arise in small pockets / areas, but the overwhelming effects are likely to be positive. This is due to the likelihood of regeneration schemes being successful and bringing forward benefits for cultural heritage in Manchester. It also reflects the presence of a suitable framework to continue to guide design work, including regeneration frameworks, the Places for Everyone policies, and the plan policies in this Manchester Local Plan.

## 7.17 Summary of Plan effects

- 7.17.1 Table 7.1 below presents a visual summary of the sustainability effect of the draft Plan, revealing a generally positive performance across most topics. The plan excels in areas such as ‘sustainable growth’ and ‘heritage’, where major positive effects are predicted due to policy support and strategic development in attractive, accessible locations (including a focus on heritage led regeneration).
- 7.17.2 Equality, health and wellbeing, flooding, and the natural environment also show moderate positive effects, reflecting the Plan’s commitment to inclusive development, climate resilience, and environmental enhancement.
- 7.17.3 Two topics show neutral or uncertain impacts (air quality and water quality), where development pressures may offset positive measures within the plan.
- 7.17.4 Additionally, minor negative effects are noted under health and wellbeing and heritage, suggesting that while the overall direction is positive, careful implementation will be needed to avoid unintended consequences for some communities.

**Table 7.1 Summary of significant effects within the draft Plan**

<b>Sustainability topic</b>	<b>Overall effects</b>	
<b>Natural environment</b>	Moderate positive	
<b>Land resources</b>	Minor positive	
<b>Housing</b>	Minor positive	
<b>Community</b>	Minor positive	
<b>Sustainable growth</b>	Major positive	
<b>Equality</b>	Moderate positive	
<b>Health and wellbeing</b>	Moderate positive	Minor negative
<b>Flooding</b>	Moderate positive	
<b>Water quality</b>	Minor positive ?	
<b>Air quality</b>	Neutral effects	
<b>Climate change</b>	Minor positive	
<b>Transport and travel</b>	Minor positive	
<b>Use of resources</b>	Minor positive	
<b>Heritage</b>	Major positive	Minor negative

## 8. Mitigation and enhancement

- 8.1.1 The Integrated Appraisal (IA) of the Manchester Local Plan has been an iterative process, in which proposals for mitigation and enhancement have been considered at different stages.
- 8.1.2 Draft versions of each plan policy have been appraised through the IA process, and recommendations made for improvements. The Council will consider these 'recommendations' alongside any feedback received from the Regulation 18 consultation on the draft Plan.
- 8.1.3 Given that the Plan is yet to be finalised, the Council may amend policies in response to recommendations within the IA. Where this is the case, a record of the changes will be recorded within the final IA Report. Likewise, where no change is considered necessary, the rationale for this will be made clear.
- 8.1.4 The following recommendations are made from the integrated appraisal work, recognising that it is still early in the plan-making process and policies and approaches are yet to be confirmed.
- 8.1.5 When making recommendations it is also recognised that the new Local Plan for Manchester needs to be read in the context of the Places for Everyone Plan, which already sets out policy measures in relation to a range of factors. These matters are therefore considered to be addressed satisfactorily already.
- 8.1.6 Table 8.1 below identifies a set of recommendations related to the draft Plan, linked to a corresponding 'issue' identified through the appraisals.

**Table 8.1: Recommendations**

Issue	Recommendation
<b>Natural environment</b> The Wythenshawe Centre and Adjacent Areas and Wythenshawe Hospital strategic growth sites are within proximity to a number of important sites for ecology, but they either do not include or have limited provisions for the natural environment, instead relying on the thematic policies.	It is recommended that these policies are revisited, and specific stipulations are added to ensure the natural environment is not adversely impacted by development on the site. This could include stipulations around protecting green and blue infrastructure, where it exists within or in proximity to the sites.
<b>Land resources</b> There is evidence of historic land contamination within the strategic growth locations, including within Victoria North, Strangeways, Sportcity, Holt Town, and Central Park. None of the specific strategic growth policies make provisions for land remediation, instead relying on thematic policies.	It is recommended that these policies are revisited to consider how they could strengthen land contamination mitigation. For example, this could include ground surveys and remediation work specific to the sites, as opposed to relying on the thematic policies.

Issue	Recommendation
<p><b>Equality</b></p> <p>The Plan provides a good framework for managing equality impacts, but it will be important to ensure that individual developments and regeneration frameworks are supported by more granular assessments to understand community level issues.</p>	<p>It is recommended that more in-depth and detailed equality impact assessments are undertaken alongside development proposals to fully understand potential impacts and deploy appropriate mitigation work.</p>
<p><b>Equality - Policy City Centre Areas</b></p> <p>Works well to promote connectivity and permeability, but has little reference to people with disabilities or mobility issues</p>	<p>It is recommended this policy is revisited to ensure it is clear that connectivity and access is universal for all.</p>
<p><b>Equality – Gypsy and Travellers</b></p> <p>Though there is identified need for pitches / sites for gypsies, travellers and travelling showpeople, no site allocations have been made in the draft Plan (instead relying on a criteria based policy).</p>	<p>Allocation of appropriate sites will provide greater certainty that needs will be met in appropriate locations in the Plan period. It is recommended that further work is undertaken to understand and assess site options.</p>
<p><b>Flood risk</b></p> <p>Some of the strategic growth policies do not make stipulations relating to flood risk where it is present.</p>	<p>Whilst this is likely to be considered under national policy and the overarching thematic policies, the strategic growth policies could be revisited to be specific about flood risk and the types of mitigation that are suitable to the area.</p>
<p><b>Water quality</b></p> <p>Some of the strategic growth policies do not make stipulations relating to water quality.</p>	<p>Whilst this is likely to be considered under national policy and the overarching thematic policies, the strategic growth policies could be revisited to be specific about protecting and enhancing water quality. This is especially true for Wythenshawe Hospital, given that there is the Fairywell Brook within proximity. Specific stipulations would help to reduce the potential for adverse effects.</p>
<p><b>Water quality</b></p> <p>There is the potential for development to impact upon the treatment of wastewater. This is not discussed through the plan policies.</p>	<p>Whilst impacts are likely to be considered under national policy, the water quality policy in the Local Plan could be updated to include provisions for wastewater treatment works – both those in Manchester and those outside the area that service it. This is likely to help ensure that the deterioration of treatment works is reduced / mitigated, especially as there are existing pollution concerns in Manchester.</p>

Issue	Recommendation
<p><b>Air quality</b></p> <p>It is recognised that a number of the strategic growth areas overlap with or are in proximity to AQMAs.</p>	<p>It is recommended that the strategic growth policies are revised to acknowledge the presence of the AQMAs, and are more explicit in how their stipulations will help reduce impacts to air quality. This is recommended for: Manchester City Centre, City Centre Areas, Strangeways, Victoria North, Holt Town, Sportcity, Central Park, Manchester Airport Strategic Site, and MIX Manchester.</p>
<p><b>Climate Change</b></p> <p>The expansion of Manchester Airport could potentially be carbon intensive.</p>	<p>Provide greater support for decarbonisation measures in relation to growth at Manchester Airport and MIX Manchester.</p>
<p><b>Health and wellbeing</b></p> <p>It is noted that none of the strategic growth area policies include a requirement for a health impact assessment.</p>	<p>It is recommended that this stipulation is added in to ensure that development will not adversely impact upon the health and wellbeing of existing and new residents and visitors in Manchester.</p>



## **Part 3: What happens next?**

## 9. Part 3: Conclusions and next steps

### 9.1 Introduction

- 9.1.1 The aim of this section is to present IA conclusions at this stage and explain the next steps in plan-making /the IA process.

### 9.2 Conclusions

- 9.2.1 Below is a brief summary of the IA findings for each sustainability objective in relation to the draft local Plan document considered 'as a whole'.

#### **Natural Environment**

- 9.2.2 The draft Plan is expected to deliver moderate positive effects for biodiversity and climate resilience by embedding ecological protections, biodiversity net gain, and green infrastructure, despite short-term habitat impacts from strategic growth.

#### **Land resources**

- 9.2.3 The draft Plan is predicted to have minor positive effects on land use by prioritising high-density development on brownfield sites, protecting green space, and reinforcing efficient land use strategies already established in the Places for Everyone Plan.

#### **Housing**

- 9.2.4 The draft Plan is predicted to have minor positive effects on housing by concentrating growth in sustainable locations and addressing diverse community needs.

#### **Community**

- 9.2.5 The draft Plan is predicted to have minor positive effects on community wellbeing by promoting connected growth, improving access to services and social infrastructure, enhancing public realm design, and addressing contamination and safety issues.

#### **Sustainable growth**

- 9.2.6 The draft Plan is predicted to have major positive effects by promoting sustainable growth in accessible areas, enhancing employment and education opportunities, and supporting community and environmental development.

#### **Equality**

- 9.2.7 The draft Plan is predicted to have moderate positive effects on equality by supporting inclusive development, addressing deprivation, and providing targeted policies for vulnerable and protected groups, despite potential risks around the impacts of regeneration of existing areas.

### **Health and wellbeing**

- 9.2.8 The draft Plan is predicted to have moderate positive effects on health and wellbeing by supporting health infrastructure, encouraging active lifestyles through design and environmental enhancements, and mitigating potential negative impacts from growth. Some minor negative effects could remain related to increased noise, density and pressure on services.

### **Flooding**

- 9.2.9 The draft Plan is predicted to have moderate positive effects on flooding by directing development away from high-risk areas and enhancing green and blue infrastructure alongside sustainable drainage systems.

### **Water quality**

- 9.2.10 The draft Plan supports water quality protection through site-specific and wider policies, but overall effects remain uncertain due to potential pressure on water treatment infrastructure.

### **Air quality**

- 9.2.11 The draft Plan is predicted to have neutral effects on air quality, as potential negative impacts from development are balanced by policies promoting green infrastructure and sustainable travel.

### **Climate change**

- 9.2.12 The draft Plan is predicted to have minor positive effects on climate change by promoting sustainable development, green infrastructure, and low-carbon transport, despite unavoidable emissions from growth.

### **Travel and transport**

- 9.2.13 The draft Plan is predicted to have minor positive effects on transport, balancing increased demand from housing and employment growth with policies promoting sustainable travel, infrastructure improvements, and active transport.

### **Use of resources**

- 9.2.14 The policies support land and energy efficiency, protect infrastructure, and promote sustainable travel and electric vehicles, resulting in minor positive effects.

### **Heritage**

- 9.2.15 The draft Plan is predicted to have major positive effects on heritage by guiding growth in historically rich areas, supporting public realm improvements, and ensuring design and regeneration frameworks protect and enhance cultural assets.

## 10. Next steps

- 10.1.1 This interim IA Report will accompany the Regulation 18 draft Plan for consultation between 22nd September 2025 and 17th November 2025.
- 10.1.2 Any comments received will be reviewed and then taken into account as part of the iterative plan-making and IA process. Following the consultation, there will be further consideration of options and if reasonable alternatives are identified, further appraisal work will be undertaken before key decisions are made.
- 10.1.3 The representations received along with further evidence base work, including further IA work, will inform the Publication version of the Local Plan which is scheduled to be consulted upon in summer 2026.

# Appendix A - Policy Screening Matrix

The matrices below illustrate the broad nature of effects for each of the policies within the Plan. This is intended to screen the policies rather than to conclude on significance of effects.

Broadly positive effects are illustrated by green shading.  
Broadly negative effects are illustrated by amber shading.  
Broadly neutral effects are illustrated by grey shading.  
Where there are uncertainties this is stated.

## Spatial Principles and Strategic Growth Locations

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>SP1</b>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Negative	Neutral	Positive	Uncertain negative	Uncertain neutral
<b>SP2</b>	Uncertain Positive	Positive	Neutral	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive
<b>SGL1</b>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Uncertain neutral	Uncertain neutral	Neutral	Positive	Neutral	Positive
<b>SGL2</b>	Uncertain neutral	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Uncertain neutral	Uncertain neutral	Positive	Positive	Negative	Positive
<b>SGL3</b>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Uncertain neutral	Neutral	Neutral	Positive	Positive	Positive
<b>SGL4</b>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Uncertain neutral	Positive	Positive	Neutral	Positive
<b>SGL5</b>	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Uncertain neutral	Positive	Positive	Negative	Positive
<b>SGL6</b>	Positive	Positive	Neutral	Neutral	Positive	Uncertain Positive	Uncertain Positive	Neutral	Neutral	Uncertain neutral	Negative	Uncertain neutral	Negative	Positive
<b>SGL7</b>	Positive	Positive	Neutral	Positive	Positive	Positive	Positive	Neutral	Neutral	Uncertain neutral	Neutral	Positive	Neutral	Neutral

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>SGL8</b>	Neutral	Positive	Neutral	Positive	Positive	Positive	Positive	Neutral	Neutral	Uncertain neutral	Neutral	Positive	Neutral	Neutral
<b>SGL9</b>	Neutral	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Neutral
<b>SGL10</b>	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Positive	Positive	Positive	Neutral	Neutral
<b>SGL11</b>	Neutral	Positive	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>SGL12</b>	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Neutral	Uncertain negative	Uncertain negative	Uncertain positive	Negative	Neutral
<b>SGL13</b>	Neutral	Negative	Neutral	Positive	Positive	Positive	Positive	Neutral	Neutral	Uncertain negative	Uncertain negative	Positive	Negative	Neutral

### Zero carbon and resilience

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>ZC1</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Neutral
<b>ZC2</b>	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Positive	Neutral
<b>ZC3</b>	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral
<b>ZC4</b>	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Positive	Neutral

### Economy, Employment and Skills

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>EC1</b>	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Neutral	Neutral	Uncertain neutral	Uncertain negative	Uncertain neutral	Positive	Neutral
<b>EC2</b>	Positive	Positive	Neutral	Neutral	Positive	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral
<b>EC3</b>	Neutral	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

## Housing and neighbourhoods

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>H1</b>	Neutral	Positive	Positive	Uncertain positive	Positive	Uncertain positive	Uncertain positive	Neutral	Neutral	Uncertain neutral	Positive	Positive	Positive	Uncertain neutral
<b>H2</b>	Neutral	Neutral	Positive	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>H3</b>	Neutral	Neutral	Positive	Neutral	Neutral	Positive	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>H4</b>	Neutral	Neutral	Positive	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>H5</b>	Neutral	Positive	Positive	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive
<b>H6</b>	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>H7</b>	Positive	Positive	Positive	Neutral	Neutral	Positive	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive
<b>H8</b>	Neutral	Neutral	Positive	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>C1</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>C2</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>C3</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Uncertain positive	Neutral
<b>C4</b>	Positive	Neutral	Positive	Positive	Positive	Positive	Uncertain positive	Neutral	Neutral	Uncertain neutral	Neutral	Positive	Neutral	Neutral
<b>C5</b>	Positive	Neutral	Positive	Positive	Positive	Positive	Uncertain positive	Neutral	Neutral	Uncertain neutral	Neutral	Positive	Neutral	Neutral
<b>C6</b>	Positive	Neutral	Uncertain positive	Positive	Positive	Positive	Uncertain positive	Neutral	Neutral	Uncertain neutral	Neutral	Positive	Neutral	Neutral
<b>C7</b>	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>C8</b>	Neutral	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>C9</b>	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>C10</b>	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>C11</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

<b>C12</b>	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
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## Environment

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>EN1</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral
<b>EN2</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Neutral	Positive	Positive	Neutral	Neutral
<b>EN3</b>	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral
<b>EN4</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral
<b>EN5</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral
<b>EN6</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive	Positive	Neutral	Neutral	Neutral
<b>EN7</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral
<b>EN8</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Positive	Neutral	Neutral	Neutral
<b>EN9</b>	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral
<b>EN10</b>	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>EN11</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Positive	Neutral
<b>EN12</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral

## Social Infrastructure

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>SI1</b>	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>SI2</b>	Neutral	Neutral	Neutral	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>SI3</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Uncertain positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral



## Transport and digital connectivity

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>T1</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Uncertain negative	Positive	Positive	Positive	Positive	Neutral
<b>T2</b>	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Positive	Neutral	Positive	Neutral	Neutral
<b>T3</b>	Neutral	Neutral	Positive	Neutral	Positive	Neutral	Positive	Neutral	Neutral	Uncertain neutral	Uncertain neutral	Positive	Neutral	Neutral
<b>T4</b>	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral

## High Quality Design

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>D1</b>	Positive	Neutral	Neutral	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive
<b>D2</b>	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Positive	Positive	Positive	Positive
<b>D3</b>	Uncertain negative	Positive	Positive	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive	Neutral	Uncertain neutral
<b>D4</b>	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Positive
<b>D5</b>	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Uncertain negative	Neutral	Positive	Positive

## Development Management

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>DM1</b>	Positive	Neutral	Neutral	Positive	Neutral	Positive	Positive	Positive	Positive	Neutral	Positive	Neutral	Neutral	Positive
<b>DM2</b>	Neutral	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive
<b>DM3</b>	Positive	Neutral	Positive	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Positive
<b>DM4</b>	Positive	Neutral	Negative	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral
<b>DM5</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive
<b>DM6</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>DM7</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>DM8</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral
<b>DM9</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

## Planning Obligations

	Natural environment	Land resources	Housing	Community	Sustainable growth	Equality	Health and wellbeing	Flooding	Water quality	Air quality	Climate change	Transport and travel	Use of resources	Heritage
<b>DC1</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral

A text only summary of the matrix is provided below. The matrix summarises policies and strategic growth locations against the sustainability objectives in broad terms. Each cell indicates the likely effect: Positive, Neutral, Negative, or Uncertain. A summary of the findings is presented below.

1. Spatial Principles & Strategic Growth Locations (SP1–SP2, SGL1–SGL13)

- Most policies score positive for housing, community, equality, and health.
- Air quality and climate change often show neutral or uncertain impacts.
- Some negative or uncertain effects appear for use of resources and heritage.

2. Zero Carbon & Resilience (ZC1–ZC4)

- Several positive impacts identified for natural environment and climate change.
- Mostly neutral for housing and community across each policy.

3. Economy, Employment & Skills (EC1–EC3)

- Generally positive for community and equality.
- Mixed or uncertain for air quality and climate change.

4. Housing & Neighbourhoods (H1–H8)

- Consistently positive for housing and equality.
- Mostly neutral for environmental factors.

#### 5. Community Policies (C1–C12)

- Positive for sustainable growth and transport.
- Largely neutral for environmental objectives.

#### 6. Environment (EN1–EN12)

- Strong positive for natural environment, water, and air quality.
- Neutral for housing and community.

#### 7. Social Infrastructure (SI1–SI3)

- Positive for community and health.
- Neutral for other objectives.

#### 8. Transport & Digital Connectivity (T1–T4)

- Positive for transport and climate change mitigation.
- Some uncertain negatives for water quality.

#### 9. High Quality Design (D1–D5)

- Positive for design, heritage, and climate change.
- Mostly neutral elsewhere.

#### 10. Development Management (DM1–DM9)

- Mostly neutral, with some positives for health and heritage under several policies.

#### 11. Planning Obligations (DC1)

- Entirely Neutral across all objectives.

