

# Response to Manchester Local Plan Issues Consultation 2020

Produced by members of *Climate Emergency Manchester*, *Rising Up! Manchester Families*, *Greater Manchester Housing Action* and *Steady State Manchester*. It does not necessarily reflect the view of all those organisations.

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## A - Background and Practicalities: how to respond

### Background

Manchester City Council is consulting on its “Local Plan” – actually the plan for the whole city. Each council has to have an up to date local plan or else they face penalties from central government. The council describes it as a framework for how the city should meet the need for new development over the next 15–20 years, including “where new development should happen, which green spaces and other aspects of the environment should be protected or enhanced, and how transport and other infrastructure will be improved”.

The first stage of the consultation is on the key issues and approaches that should influence the Local Plan. Later stages will allow comments on particular policy areas.

The consultation document can be downloaded or viewed on screen via this link:

<https://tinyurl.com/McrLocal>

Note on how to respond, from the council paper

**The (extended) deadline for responses is .... 17.00 on Friday 1st May.**

How to comment on the Issues Consultation (Section ‘1’ / Introduction)

**1.5** Comments on the Issues Consultation can be sent to Manchester City Council in the following ways:

1. Use the online consultation website at <https://manchester-consult.objective.co.uk/portal>
2. Email your comments to [planningstrategy@manchester.gov.uk](mailto:planningstrategy@manchester.gov.uk)
3. Send in your comments by post to

Planning Strategy  
City Policy  
Manchester City Council  
Level 3, Town Hall Extension  
PO Box 532  
Manchester  
M60 2LA

**1.6** If you choose to email or send in your comments by post, it would be very useful if you could set out your answers against any specific questions you wish to comment on.

You will need to register to use the above website if you have previously not commented through the online portal

**The (extended) deadline for responses is ..... 17.00 on Friday 1st May.**

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## B - Outline for suggested responses

It is recommended to respond following the structure provided by the Council (the questions set). Some ideas are included below - in green text. Feel free to add your own, trim sections and generally amend as you see fit.

Please note that there will be further stages in this process in which more detailed plans will be presented.

The structure provided by the Council can be summarised as follows:

**Context** - Two questions on the general spatial principles, and how the Local Plan relates to other processes

**Our Future Manchester** - Four questions on the 'vision' and objectives

**Spatial Portrait** - Two questions on neighbourhood-level issues

**Strategic Issues** - A chunky section asking how the plan relates to other 'strategic issues' and in which zero-carbon, clean air, health and transport are explicitly mentioned. Fifteen questions in total.

**Other key issues** - Another meaty section, with questions on skills and education, economic growth and housing.

The document closes with a section on the **evidence base** used and the **next steps**.

## Context

Q1: Should the new Local Plan continue with the spatial principles as expressed in the current Core Strategy?

No. The plan currently out for consultation varies little from the Core Strategy 2012-2027. The last decade has seen momentous change and upheaval, both micro and macro and a plan unchanged in this time clearly cannot be addressing the issues of the day. These principles require a thorough revision in the light of climate change, Brexit, a decade of austerity and the covid-19 pandemic, together with the social, economic and environmental consequences of these major changes since 2012. This proposed Manchester Local Plan lacks the ambition and vision desperately needed in 2020 of how we can bring about a healthy, happy green city within the current challenges.

We strongly object to the following stated spatial principles, and explain our reasons:

- "Manchester Airport will act as a catalyst for regional growth and will be a second economic hub". *Reason:* This is not in line with Manchester City Council's commitments, nor those of GMCA and the other nine GM councils, all of whom have declared a climate emergency. It is incompatible with the promises made by Manchester City Council, particularly as emissions from the airport have explicitly been included in the council's indirect emissions targets in the recently approved Climate Action Plan 2020-2025. The recent ruling against the expansion of Heathrow should also be noted: expansion of aviation will reduce the available carbon budget, both nationally and here. Please see Q9 for further comments on the aim to increase revenue from Manchester Airport.
- 545,530 new homes *Reason:* Continuing to scale up the population in the city centre will place a huge strain on local infrastructure. Further, a failure to build for middling and lower income households will, inevitably, lead to gentrification of city centre areas and further slumification of the suburbs. This will intensify the rise of unlicensed HMOs and the incidence of multiple families sharing one property as concealed households.

- 1,759,847m<sup>2</sup> of new offices *Reason:* This is now unrealistic for the post-covid-19 era.

Q2: Are there any alternative spatial principles that should be included? If so what are they?

Yes, there are other spatial principles which this proposed plan is lacking.

1) *Spatially supported well-being.* The spatial design and redesign of the city needs to explicitly follow from the need to increase the wellbeing of ALL residents. This aim must be absolutely key, underpinning all other aims, as opposed to being merely listed alongside a handful of objectives.

A good practice example of this is for planning to ensure that it meets the needs of children, older people and those with limitations. A city which is good for the young, old and disabled is good for everyone. Therefore the allocation of space needs to prioritise pedestrians, cyclists and those who have impaired mobility. That means a reduction in space allocated to motorised transport, particularly the private motor car. It is encouraging to hear that councillors are already working on this principle in the light of the lock-down experience of reduced traffic, utilising guidance from CyclingUK.

This principle is also relevant economically and was lacking in the 2012 Core Strategy. There was an assumption that benefit would 'trickle down' but this has often not been the case.

2) *Spatial design must make appropriate assumptions about population and economic scale and growth.* For instance, the spatial framework makes increasingly unwarranted assumptions about economic and population growth, already looking implausible with Brexit and now looking even more uncertain given the unprecedented pandemic shock to the global economy.

3) *Ecological priority.* Spatial design and redesign needs to explicitly protect, enhance and maintain green space, the natural environment and biodiversity.

4) *Polycentric city and 20 minute neighbourhoods.* This involves the positive development of local centres, with the city centre covering only the essential functions that cannot be covered more locally. Likewise it means more distributed economic development rather than the current emphasis on employment hubs which require a great deal of mass mobility. Most facilities needed by Mancunians in their everyday lives should be easily accessible, not far from home.

Manchester can draw on the experience of cities around the world that are rebalancing towards a more polycentric model. Consider the 20 minute neighbourhood model being adopted in a number of cities including Portland Melbourne and Paris. This would be a coherent basis for "any reasonable alternative

model" to both the GMSF and former Core Strategy assumptions. It would be consistent with working towards a city and region with stronger, more self-sufficient local centres, thereby reducing the need to travel, and hence traffic, air pollution and greenhouse gas emissions.

5) *Spatial design for a low energy future.* Some urban scholars and campaigners emphasise a low energy future for suburban areas, with many more needs met locally (as in the 20 minute neighbourhood approach), increased local food production and other provisioning, much lower energy consumption and strengthened community ties. Critically it involves greatly reduced private vehicle use and expanded public transport and active travel. It is realistic in that it prepares the city for two major threats:

- the inevitable energy descent as we cease using fossil fuels for climate and ultimately cost reasons,
- the likely disruption to supply chains from climate change and other geopolitical, ecological and economic shocks.

Further comments on the above alternative principles

The pandemic lockdown is resulting in seismic shifts in both people's situations but also in people's awareness of issues and values held with a high number of people stating that they do not want life to return to 'normal'. Now is the time for cities to be bold. There is increased respect for community, time with family, awareness of the need for food production and of interest in cycling. Numerous employers have had the experience of employees working from home and might be open to greater flexibility in future which has implications for the potential to reduce rush hour stress on public transport.

There are opportunities which Manchester, as a city with a high level of digital expertise, should be ready to capitalise on. At the same time the challenges faced, especially by the vulnerable, have increased hugely. There must be a plan for meeting these challenges.

The plan must be underpinned by these key principles otherwise there is the risk that even potentially positive aims could cause harm. For example, planning for a dense city can be positive (although the evidence is not entirely clear on this question) but there is the risk of encroachment on the existing green space and of vertical sprawl.

## Our Future Manchester - vision and objectives

Q3: Do you agree or disagree with the draft vision?

Largely disagree.

#### Q4: Do you agree or disagree with the draft objectives?

There are some positive objectives in the plan. However, the aims within the plan are fundamentally flawed and inadequate. New objectives would need to be defined in order to achieve the aims we argue are fundamental.

#### Q5: Why do you agree or disagree with the vision?

The vision sketched out does not add up to a compelling vision of the kind of Manchester that we should be aiming for, for the present population and for future generations. The fact that the vision has not changed in response to any of the events of the last decade seems evidence enough to show that it is lacking.

We are deeply concerned about the absence of scenario-based planning within the document. In an uncertain world we should expect our planners to consider multiple scenarios. Certainly it is necessary to plan for the possible economic downturn, which was becoming increasingly likely even before COVID19.

Like the Draft Spatial Framework, this outline for the Local Plan has some good things in it, for example on becoming carbon neutral and on protecting and enhancing green space. However these ambitions are in contradiction with other elements like expanding the airport and a continued building boom for flats, offices and warehouses in certain areas.

The vision emphasises economic growth but [economic growth brings a growth in ecological pressure](#), including emissions and damaging extraction across the world. The plan offers no comment about how these conflicting facts should be handled.

Again, other cities offer inspiration about possible ways forward. Amsterdam will be applying the [Amsterdam City Doughnut](#) - a toolkit which will apply Kate Raworth's Doughnut Economy principles to the city scale, ensuring that residents' needs and well being will be met while at the same time being an ecologically sound city. Plymouth has joined another 27 cities across the world which have committed to producing everything they consume by 2050, under the [FAB City initiative](#). This will generate better quality jobs, business opportunities and well being whilst at the same time becoming an exemplar for what a forward thinking, resilient sustainable city could look like.

## Q6: Why do you agree or disagree with the draft objectives?

We have argued above that the vision is lacking and that there is a need for the aims of well being of ALL residents and of meeting environmental aims to be clearly stated. It is vital that this overarching vision be put in place first as objectives follow on from this.

However, a couple of objectives are entirely missing from the plan.

There should be objectives which tie into the work around Manchester *Food Futures*. Food security is an increasingly pressing issue. Both in access to food for disadvantaged families and in addressing future likely shocks to the food supply system, whether from climate breakdown, pandemics, Brexit or any other shock. There is some great work and projects being done across the city but it is piecemeal and needs to be included as an objective within the Local Plan. Again there are positive examples from across the world. As a response to COVID19 Singapore is putting measures in place to ensure the city can meet ten percent of its food needs from food grown within the city.

Supporting biodiversity must be included as an aim as must protection and enhancement of natural systems for carbon sequestration.

## Spatial Portrait: What could this mean for your neighbourhood?

Q7: Do you think that the key issues in each of the main neighbourhood areas have been identified?

We would like to flag comments of Wythenshawe residents to the Local Plan and ask that MCC seriously consider any points raised at the Local Plan consultation event held at Wythenshawe forum. Even in the context of local growth, Wythenshawe residents do not always see the benefit. For example, benefits to the 'local economy' of the airport (included jobs gained) defines local as a 30km radius of the airport. This statistic can therefore mask the lack of jobs that are gained by those most immediate to the airport.

Q8: What additional issues should we consider in your neighbourhood area?

## Strategic issues

To achieve a zero-carbon Manchester by 2038 at the latest

Q9: What do you think are the main priorities that the Local Plan should focus on to achieve the target of a zero-carbon city by 2038?

Everything we have outlined so far will help achieve the target of a zero-carbon city by 2038. Reducing carbon emissions is not an easy endeavour and cannot be achieved as an add-on to business as usual. The city of Manchester missed the 2018-19 target of 13% reduction of carbon emissions by 11%.

While MCC continues to talk up the carbon emissions reductions made they were to a substantive extent due to the decarbonisation of the National Grid and cuts to the LA imposed by the Coalition and Conservative governments and will be exceedingly difficult to continue.

How we organise our cities cannot be the entire answer to any of these areas but can make a substantial difference. To reiterate. The cities which we might look to for inspiration (and did in the 2016 Our Manchester Strategy) have taken very different paths to Manchester.

We also suggest the following areas of action to deal with the most significant contributors to the city's greenhouse gas emissions.

- Prioritise the repurposing, reoccupation and retrofit of existing buildings as a clear priority over demolition and rebuilding, including via use of compulsory purchase orders and council tax increases for empty properties.
- Commit to a retrofit scheme and the associated requirements in terms of training, workforce pipeline and training. This could be scaled up via an innovative programme in partnership with energy providers and (in the first place) social landlords to move from an energy supply system to a temperature guarantee system with incentivisation of boiler replacement and home insulation. This should be coupled with street by street energy reduction planning.
- Introduce a mandatory GM zero carbon housing standard for immediate implementation – not by 2028
- Traffic light system, publicly available to rate major organisations (public and private) on their carbon reduction plans and their achievement on them.
- Urgent strategy to reduce Manchester's scope 3 (consumption) emissions.
- Protection and enhancement of natural systems for carbon sequestration.
- Encouragement and support for citizens to make lower carbon choices, combining neighbourhood support and advice teams with city-wide public awareness campaigns, including competitions and awards for pioneering low carbon citizens.

## Manchester Airport

Rather than the airy commitment to using the airport as a motor of prosperity, with little or no heed to the drastic environmental and climate consequences, not to mention the risks of such a strategy in the post-Covid and post brexit world, we argue for **a moratorium on airport expansion, followed by a managed reduction in flights** and inclusion of aviation emissions in Manchester's carbon accounting is essential. We acknowledge that currently Manchester relies economically on the airport but that does not change the inescapable scientific facts. It will therefore be vital to ensure that there is a coherent plan for replacing the city's aviation dependency with alternative means of wealth generation. More detailed suggestions follow.

In addition to a Strategic Review, MAG's Carbon Road Map should be updated.

- It is very difficult to assess claims made about the airport when there is so little transparency about the MAG board (including its membership).
- Before even considering committing to further airport growth, we would ask MCC to write to MAG asking for a Strategic Review of Manchester Airport Expansion. This review should involve:
  - a. A stress test of the current business model which estimates a 50% increase in flights by 2050.
  - b. Highlighting the full carbon footprint of Manchester, East Midlands and Stansted airports (perhaps working with the Tyndall Centre in this).
- Ensure that future estimates include the incorporation of CO2 emissions required under the Paris Agreement as well as the impact of future pandemics similar to the current COVID19 pandemic.
- Fully include the views of other councils within Gtr. Manchester as well as councils in proximity to East Midlands and Stansted.
- Be carried out as a matter of urgency given the potential losses to MAG this year, and future potential negative rate of return on investment.
- MCC should explore the possibility of levying a frequent flyer tariff at Manchester and other airports. If this requires central government

cooperation then there should be lobbying for such legislation. This policy would be the optimal means of ensuring climate justice in Manchester. Politically it is much easier to legislate against frequent flyers than those who can only afford one flight a year. Other means of decreasing MAG's carbon footprint should be explored such as significant increases in car park charges and in airport departure tax.

- We would also ask that MCC request information on numbers of private flights in and out of MAG airports. Explore the potential of banning or seriously restricting/taxing private flights.

Issues which require further research include:

- What planning permission does MAG require for further expansion? What has already been granted and can be reversed?
- What is the percentage of flights that are freight only? How much of that freight is sold outside Gtr. Manchester? What controls can MAG impose on that freight to contribute to carbon neutrality?
- What percentage of MAG airports' passenger flights are transit? What measures can be taken to reduce this number? What revenues are made from transit passengers and freight?
- Detailed scrutiny of MAG accounts/ audit reports.
- Detailed scrutiny of MCC and other GMCA officers' representation on MAG board.

Q10: Are there any other key actions that should be addressed in the Local Plan?

**To deliver a sustainable transport system that supports spatial development**

Q11: What specific links do we need to make with other strategies (eg. Clean Air Plan; City Centre Transport Strategy; 2040 Transport Strategy) in terms of policies that should feature in the Local Plan?

Q12: Should the Local Plan address parking needs and provide standards?

The Local Plan should include a commitment to reducing the provision of parking in the city and district centres and to reduce on-street parking in residential areas.

To balance the competing demands for space

Q13: In the context of the scale of growth expected and the intention to create a dense, vibrant city, what form should development take to achieve this end?

This section needs radical revision since “the scale of growth” will, and should, be much lower than previously anticipated.

We question the population growth forecast in the light of Brexit and post-pandemic changes in the economy. Will the employment market continue to “widen and deepen” and “the confidence for business and others to invest in the city” continue to increase? Can we really expect an additional 63,000 jobs by 2038?

It might be worth focussing on building housing stock that meets the needs and incomes of the *existing* population.

Q14: Are there specific parts of the city where you think certain types of development are needed?

Q15: What types of development are needed?

The 20% target for new affordable housing overall in the city is too low, even for hitting minimum basic needs.

MCC should overhaul its affordable housing delivery (policy H8 in the Core Strategy) to get rid of loopholes and strengthen defences against planning appeals over viability by developers. Manchester does really badly on affordable housing compared to other cities.

There needs to be greater emphasis on homes for affordable rent. Over 85,000 people are on the local authority housing waiting lists in Greater Manchester.

MCC should also encourage the adoption of models such as housing co-operatives, co-housing, intergenerational housing models, and community land trusts.

It is unlikely that a satisfactory range of housing types can be delivered by relying on current market forces and developer preferences.

We would like to see phased mixed tenure, and mixed occupancy housing with social rents forming at least 35% of the proposed housing offer. This is in response to the already high growth rate of the private rented sector and concurrent shrinkage of the social sector.

There should be commitment to building lifetime homes and more than lip service to age friendly communities.

#### Q16: What evidence can you provide to support your views?

An initial needs assessment you commissioned in 2007 came up with a figure of 30% for affordable housing, which was later overturned by another study which said 20% would be enough assuming people can get housed in the bottom end of the private rented sector (and plenty of other cities have higher targets, including London). This seems to be a case of relying on policy-based evidence to justify dropping affordable housing in favour of chosen regeneration strategies.

See this report from Shelter:

[https://england.shelter.org.uk/\\_data/assets/pdf\\_file/0004/1779367/Manchester\\_Social\\_Housing\\_Policy\\_Briefing.pdf](https://england.shelter.org.uk/_data/assets/pdf_file/0004/1779367/Manchester_Social_Housing_Policy_Briefing.pdf)

To ensure critical infrastructure requirements are addressed

#### Q17: Are there any specific infrastructure requirements that need to be prioritised in the plan, and if so, what are they?

Improved provision and maintenance of cycleways and pavements.

Use of plantings to mitigate climate impacts and reduce the need for heating and cooling of buildings. Increase in allotment provision.

Investment in the electric grid to deal with switching of modes to electricity (albeit within a planned reduction in energy demand overall).

Increased rainwater harvesting to reduce energy demand and build resilience of the water supply system.

Option appraisal on a scheme for investment in suburban biogas generation to manage green and food waste with lower vehicular traffic and as part of the strategy for replacing fossil gas.

Q18: What evidence can you supply that sets out how any key elements of infrastructure can be delivered?

To create neighbourhoods that promote and enable healthy lifestyles

Q19: What are the key design elements that should feature in policies in the Local Plan?

We very much support the stated Local Plan aim to have close knit neighbourhoods where people know each other and are able to walk, cycle to leisure, work. To make this a reality there needs to be a commitment to a principle such as the 15 or 20 minute neighbourhood. Evidence shows (e.g. [HERE](#) and [HERE](#)) that children do better living in places where they are able to walk or bike safely to shops/park etc. It is highly beneficial for our oldest residents and for those on lower incomes. Such city design reduces overall costs as well as reducing the need to own a car. This is also a principle which is essential in Manchester being able to achieve targets on carbon reduction.

- The NPPF promotes places which “promote social interaction including opportunities for meetings between people”. We need a genuine commitment to creating streets where cars are not dominant, where children can safely play and where there is natural shared space to interact. We note that there has been a small step towards such a culture in adoption of the Play Street scheme and in the Levy Beelines but the pace of change is far too slow. These principles need to be firmly established in the Local Plan to ensure that they do not require years of work to become a reality.
- The NPPF also states that planning should “allow for easy pedestrian and cycle connections within and between”. Implementing a policy of 15 minute neighbourhoods and focusing on creating strong local centres, rather than a “suck” into the regional city centre (as the current proposal specifies) would help reduce the number of journeys made each day. But for this to be a reality there must be a real commitment to pedestrians and cyclists before cars. There have been a number of highly controversial decisions recently which have actually decreased cycle access (removal of cycle lanes on Ancoats, widening of road at Hulme, removal of the bridge which formed part of a key cycle route in order to widen the road). Implementation of cycle

routes has been piecemeal. We need cycle infrastructure which makes it safe and viable for everyone to cycle which means a physical barrier between cyclists and cars.

- We fully support the proposal for a car free city centre ([ontheplatform.org.uk](http://ontheplatform.org.uk)).

Q20: How can policies in the Local Plan assist in delivering better health outcomes alongside the approaches already set out in Our Healthier Manchester?

- Making active travel a reality in Manchester would transform the health of residents, as would 20 minute neighbourhoods because of the increased level of activity and exercise. Such policies would also lead to a massive improvement in air quality which would deliver hugely improved health outcomes, being as currently 1 in 23 Mancunians will die from air pollution related causes.
- Increasing opportunities for play and for socialising as outlined above would increase the physical and mental health outcomes of both children and adults.
- Including objectives around growing food within Manchester, especially around community projects would also greatly assist in improving health outcomes.

## Overall strategic questions

Q21: Do you consider we have identified the main strategic issues?

Q22: Are there any other issues that you think should be included as a strategic matter?

- Energy descent.
- Preparation for welcoming an influx of climate refugees.

Q23: Please let us know any other issues you think we need to consider?

## Other key issues

Economy

Q24: How can our Local Plan create a sustainable, inclusive and highly skilled city, supporting a diverse and distinctive economy?

Q25: How can we ensure that more of our residents have access to well-paid employment?

Committing to becoming a FAB city, as suggested above, would create numerous new business and employment opportunities as more needs are provisioned locally.

Q26: How should the Local Plan help to ensure that with a growing population there is the right level of education provision in accessible locations?

Q27: What can be done to maximise the breadth of all the city's assets to attract even more visitors, boosting the local economy still further?

- The key aims of resident well-being and of environmental protection and enhancement need to be in place first in order to be able to set parameters for tourism which should emphasise the quality rather than quantity of visitor and tourist experiences and recognise that there are limits to the number of visitors that the city can sustain. Visitors are not an inherent good, they bring challenges as well as benefits, for example increased traffic and air pollution, the proliferation of apartments being used for AirBNB which impacts both hotels and would be renters. Manchester can learn here from the example of Barcelona.
- It is likely that making the city centre car free would make Manchester a more appealing tourist destination, as has been seen by other cities which have done this, while at the same time increasing the well being of residents and meeting environmental aims.

Manchester's city centre

Q28: How can the Local Plan support the continued economic success of the city centre?

The aim of achieving economic success must be underpinned by clear aims around well being of residents and of meeting environmental aims.

The 2012 Core Strategy was focused on growing the economic power of Manchester. It did not specify that planning needed to make things better for the people who lived here, did not make the connections between the planning decisions and the lives lived there. There was an unstated assumption that what was good for the economy was good for everyone which is not the case: much development in the city exports its profits out of Manchester to London and other financial centres, globally. As an example, the aim of creating one of the top economic cities in the world has resulted in expensive land. Manchester residents are less likely than the average to own their home. City centre developments have been criticised by groups such as SHELTER for their lack of affordable housing. The majority of the developments are sold off to investors who can afford to put large amounts of money upfront, far in excess of the standard mortgage requirements. Such investors are often based overseas. While this makes it easier for developers it means both that developments are out of reach to local people and that profit made does not benefit the community or the city but instead will go overseas. A substantial number of properties are let using the AirBnB model which creates additional problems for residents and flies in the face of creating strong cohesive local communities. While we recognise that such policies have given Manchester funds in a time of austerity this is of course not a sustainable policy and we ask the question of what is to happen when the city has been substantially sold off.

- The Local Plan must recognise that Manchester's economy and the success of the city centre has been dependent on Mancunians and on the environment. Therefore any effort to support Manchester's economic success should be balanced with clear and sustained efforts to improve the social conditions of city centre residents, as well as those across the city, but also to steward the environment, both locally in the bioregion and at a global scale.
- Practical examples involve clear plans for moving away from the car-centric model, including revoking existing planning permissions for car parks in the city centre and for faster traffic flows into the city centre. The Local Plan should also clearly indicate how the city centre will move toward becoming car-free and transitioning toward becoming a cycling- and walking-friendly city centre, modelled on the efforts underway in cities such as Amsterdam, Copenhagen, Ghent and Barcelona. This will meet both social and environmental goals, and support the success of Mancunians and the natural world, not solely the economy. The Local Plan should also include the establishment of a clear timescale for this transition.

Q29: How do we effectively balance the role of the city centre as an economic powerhouse and as a place to live, visit and socialise with the necessary transport and social infrastructure?

As above in Q28.

Places to live

Q30: What specific housing needs should the review of the Local Plan be considering?

While the challenges of homelessness and housing affordability that Manchester faces are acknowledged, these should be given more central consideration in the Local Plan. Homelessness in Manchester continues to get worse and housing costs continue to rise. Indeed, housing is becoming even less affordable across the city. While there are many causes of this, a significant one is that the needs of private housing developers are outweighing those of the homeless and those seeking affordable housing. Specifically, developers are being granted exemptions to Section 106 of the Town and Country Planning Act. The Local Plan should consider that, to meet the needs of homeless and affordable housing, the exemptions from Section 106 obligations for private developers must end.

Q31: How can the Local Plan ensure that sufficient homes of a variety of types and tenures are delivered across Manchester to meet all people's housing needs, while creating attractive neighbourhoods where people want to live?

- By eliminating the exemptions granted to private developers under Section 106 of the Town and Country Planning Act, the Local Plan can ensure that housing for residents with different kinds of housing needs are met, especially those who are least able to afford it.
- Principle of mixed use, mixed income areas.

Q32: How can the Local Plan help local facilities to be supported to ensure their long-term viability?

The Local Plan can help local facilities be supported by ending the practice of granting exemptions from Section 106 of the Town and Country Planning Act to developers. This will ensure that private developers: i) provide housing for residents

with different kinds of housing needs, especially affordable housing; and ii) contribute toward the public assets that they benefit from, such as green space, public transit, schools etc.

Q33: How should the Local Plan best balance the need to preserve existing assets with the need to support sustainable and inclusive growth?

The Local Plan should recognise that the distinction between preserving and supporting growth is a false one: there is no balance between these that must be made. In particular, the Local Plan should recognise that it is operating under a false assumption about the need to support growth, as well as the further false assumption that growth can be either sustainable or inclusive. Instead, the Local Plan should establish a recognition that preserving existing assets, including nature, is a fundamental necessity. Manchester's economy and society are dependent on the environment, and building the Local Plan based on the assumption that it must support growth means that Manchester will fail at preservation, sustainability and inclusion.

Sustainable and resilient cities

Q34: What specific links do we need to make with other strategies (eg. Clean Air Plan; Green and Blue Infrastructure Strategy) in terms of policies that should feature in the Local Plan?

- While not yet a strategy, the Manchester City Council's declaration of a 'Climate Emergency' in July 2019 should be explicitly integrated into the Local Plan. While several commitments - notably about Manchester becoming carbon-neutral by 2038 - have been integrated into the issues that will feature in the Local Plan issues, they have not made clear the link with the City's important decision to declare a 'Climate Emergency.'
- The city's policy for sustainable food (adopted following a motion in council, moved by Cllr R Akbar) should be clearly referenced, supported and developed via the local plan.

Q35: Are there any other issues that need to be considered?

Q36: Please let us know any other issues you think we need to consider?

The consultation is not at all accessible. There are a number of networks in Manchester that would be able to work with the council to facilitate this sort of targeted engagement either at local levels or city-wide such as the Inner City Exchange Manchester platform facilitated by [CLASS](#) and the Greater Manchester

Savers network which draws together community groups from disadvantaged neighbourhoods across the City of Manchester.