



The Planning  
Inspectorate

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# Report to Stockport Metropolitan Borough Council

by **Ian Broyd MRICS Dip TP**

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

Date 2 February 2011

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE STOCKPORT CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 20 August 2010

Examination hearings held between 30 November and 2 December 2010

File Ref: PINS/C4235/429/4

## **ABBREVIATIONS USED IN THIS REPORT**

<b>AA</b>	<b>Appropriate Assessment</b>
<b>AH</b>	<b>Affordable Housing</b>
<b>HVS</b>	<b>Housing Viability Study</b>
<b>CRA</b>	<b>Core Retail Area</b>
<b>CD</b>	<b>Core Document</b>
<b>CS</b>	<b>Core Strategy</b>
<b>DPD</b>	<b>Development Plan Document</b>
<b>FPMC</b>	<b>Further Proposed Minor Change</b>
<b>GI</b>	<b>Green Infrastructure</b>
<b>GM</b>	<b>Greater Manchester</b>
<b>ha</b>	<b>hectare</b>
<b>HNS</b>	<b>Housing Needs Study</b>
<b>IC</b>	<b>Inspector's Change</b>
<b>LDS</b>	<b>Local Development Scheme</b>
<b>LP</b>	<b>Local Plan</b>
<b>MBS</b>	<b>Metropolitan Borough of Stockport</b>
<b>MDS</b>	<b>Major Developed Sites</b>
<b>pa</b>	<b>per annum</b>
<b>PDL</b>	<b>Previously Developed Land</b>
<b>PM</b>	<b>Proposals Map</b>
<b>PMC</b>	<b>Proposed Minor Change</b>
<b>PPG</b>	<b>Planning Policy Guidance</b>
<b>PPS</b>	<b>Planning Policy Statement</b>
<b>RSS</b>	<b>Regional Spatial Strategy</b>
<b>s</b>	<b>section</b>
<b>SA</b>	<b>Sustainability Appraisal</b>
<b>SCI</b>	<b>Statement of Community Involvement</b>
<b>SCS</b>	<b>Sustainable Community Strategy</b>
<b>SHLAA</b>	<b>Strategic Housing Land Availability Assessment</b>
<b>SHMA</b>	<b>Strategic Housing Market Assessment</b>
<b>SPD</b>	<b>Supplementary Planning Document</b>
<b>sqm</b>	<b>square metres</b>
<b>SRA</b>	<b>Strategic Regeneration Area</b>
<b>SSLS</b>	<b>Stockport Shopping &amp; Leisure Study 2009</b>

## **Non-Technical Summary**

**This report concludes that the Stockport Core Strategy Development Plan Document provides an appropriate basis for the planning of the Metropolitan Borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.**

**A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:**

- Additional text to explain how a less than first 5 year housing supply will be dealt with.**
- A fuller reasoned justification to explain the basis of the Employment Strategy.**
- The need for Development Management Policy SIE-3 (Protecting the Natural Environment) to refer to the Council's Landscape Character Assessment and confirm it will follow PPS9 in determining applications.**
- Addition of a reference to the Council's intention to produce a Supplementary Planning Document to guide the planning of the Woodford Aerodrome site based on the Principles of Development set out in the Core Strategy.**

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

## Introduction

1. This report contains my assessment of the Stockport Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the document published for consultation between 7 June and 19 July 2010.
3. My report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report (**PMC or FPMC**). All of the changes have been put forward by the Council as a result of its response to representations or questions from me in writing or at the hearing sessions. None of these changes should materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken.
4. Some of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Council's view that they improve the plan. These are shown in Appendix A and B. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
5. Where the Council has proposed changes that go to soundness they have been subject to public consultation and I have taken the consultation responses into account in writing this report.
6. References in my report to documentary sources are provided in footnotes and where relevant quoting the Core Document reference number in the examination library.

## Assessment of Soundness

### Preamble

7. On 6 July 2010 the Secretary of State announced the revocation of Regional Spatial Strategies (RSSs) with immediate effect. In response to that announcement, the Council produced a schedule of minor changes to the published Core Strategy DPD to reflect the revocation of the North West of England RSS. However, following the decision of the High Court on an application for judicial review by Cala Homes (South) Ltd, the Secretary of State's decision to revoke RSSs was quashed. Accordingly, the Council's proposed changes insofar as they seek to remove references to the RSS are premature pending the government's proposed revocation becoming law. To

avoid redrafting the schedule of Minor Changes<sup>1</sup> I withhold endorsement of the proposed changes that would delete references to the RSS.

8. In fact, whether or not the RSS remains in place has little effect on the CS. The Core Strategy's evidence base which draws on RSS, Greater Manchester Authorities' and the Council's own studies is both robust and credible. It is as up to date as it can reasonably be in providing a forward strategy for land use planning in this part of the Manchester conurbation.
9. In terms of housing provision, the CS takes as its starting point Stockport's share (4.5%) of the RSS's housing target<sup>2</sup> for the ten Greater Manchester authorities. That apportionment results in 450 net additional dwellings/pa over the 15 years of the plan. The Council has adjusted this to take account of the Greater Manchester (GM) 2010 update of the Strategic Housing Market Assessment (SHMA) for housing growth providing a 15 year average of 480 dwellings/pa<sup>3</sup>. The CS is compliant with the RSS and is backed by freestanding evidence to justify its housing strategy. Moreover, other development levels (such as commercial and retail development) have been the subject of specific, local evidential justification for the relevant Core Strategy policies.
10. Amendments to PPS3, relating to the definition of previously developed land and deleting the national indicative minimum density of 30 dwellings per hectare, were published during the consultation period of the CS. The Council's proposed minor changes to the CS take into account those amendments.

## **Main Issues**

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified 8 main issues upon which the soundness of the plan depends.

### **Issue 1 – Whether the overall strategy has a sound basis having regard to the Borough's context and needs and the relationship with other plans and strategies and whether it deals adequately with uncertainty.**

12. The evidence base recognises Stockport's Greater Manchester context and provides a thorough appraisal of the district, its place in the conurbation, the sub-region and beyond. It appropriately deals with its relationship with other plans and strategies.
13. On-going work is addressing the transport implications of growth, particularly in the Town Centre<sup>4</sup>. Meanwhile, the CS deals appropriately with land use transport interrelationships. Taken in the round, the evidence suggests that the overall strategy is soundly based.

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<sup>1</sup> Schedule of Proposed Minor Changes CD k

<sup>2</sup> MBS/Housing Topic Paper, paragraph 1.4

<sup>3</sup> MBS/Housing Topic Paper, paragraph 1.5

<sup>4</sup> MBS letter to the Highway Agency 19 April 2010-Appendix 1b, Response to Inspector's initial questions.

14. The uncertainties over the future economic climate and the extent to which it will impact on the strategy are recognised in the CS<sup>5</sup>. The plan is for the long term, initially, for 15 years. Should the annual monitoring report suggest adjustments need to be made for economic, or other reasons, a review of the plan will need to be considered. This fall back position should be adequate to deal with future uncertainties.

**Issue 2 – Whether the strategy to secure sustainable development and deal with climate change is sound.**

15. Sustainable development, equality and climate change are addressed in Core Policy CS1 and Development Management policies SD – 1 to SD - 6. This group of policies is comprehensive, inclusive and sets an admirably high standard in order to achieve sustainable development. They cover measures to encourage higher standards than presently prevail under the Building Regulations assessed against rating systems including the Code for Sustainable Homes, BREEAM, CEEQUAL and Building for Life and/or Lifetime Homes. The policies, rightly, seek ambitiously high standards to deal with this environmentally crucial issue.
16. The policies exhort home owners and developers to improve the energy performance of Stockport's existing housing stock as well as new development. This includes the provision of district heating in network development areas<sup>6</sup> and microgeneration areas where district heating would not be practicable. Thresholds for the scale of development to which the policy would be applied are set out.
17. Concern was raised that the policies contained in this section would place too great a burden on developers to the point that schemes would be made unviable. However, it is clear that the policies will only be applied where it is viable to do so<sup>7</sup>.
18. In response to concerns that it was not clear that district heating installations across the district would only be required where technically feasible and viable to do so the Council agreed to a Further Minor Change (**FPMC/O34**) to confirm that intention. Also highlighted is the role that community owned energy can play through large wind turbine and hydro energy schemes. In adapting to climate change, all development will be required to incorporate Sustainable Drainage Systems.
19. Where the requirement for a 50% attenuation in the run-off rate on previously developed land would render a scheme unviable, it would be for the Environment Agency to decide whether the requirement could be relaxed. The CS in respect of this issue is sound.

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<sup>5</sup> Core Strategy, paragraphs 2.103 & 3.220

<sup>6</sup> Paragraph 3.52 of the CS

<sup>7</sup> CS, paragraph 3.10

### **Issue 3 – Whether the plan makes sound provision for housing in terms of overall numbers of dwellings, their distribution throughout the district, the mix of housing and affordable housing.**

#### ***Housing Provision (Core Policy CS2)***

20. The CS provides for a net addition of 7,200 new homes for the 15 year period 2011 – 2026. This is made up by the following trajectory: for the first 2 years - 450 new units/pa; for the following 10 years - 495 units/pa; reverting for the remaining 3 years to 450 units/pa. This exceeds the RSS target of an average 450 new homes/pa for the period of the plan.
21. Nevertheless, in April 2010, the Council undertook a review of its first 5 year supply of deliverable housing in the knowledge that the economic recession was delaying anticipated housing delivery in the early years of the plan. The review concluded that, due to the economic climate resulting in fewer large applications being submitted and sites with permission stalling, only 1,784 new homes or 4.4 years supply would be available compared with its earlier forecast. Given the requirements of PPS3, I considered that this situation and the means by which the shortfall would be addressed should be spelt out more clearly in the plan. The Council propose to add a new paragraph to the reasoned justification for Core Policy CS2 (Housing Provision) to provide that clarification (**FPMC/O45**).
22. The clarification confirms that, in order to top up the deliverable supply, planning applications for housing will be considered more favourably through the measures set out in paragraph 3.115 that deals with phasing. Those measures refer to a relaxation in the PDL target set out in the CS from a figure of at least 90% to 80%; the latter representing the RSS target<sup>8</sup>. Other provisions involve lowering accessibility scores, which have been used to identify the most sustainable sites for development, below the first and second spatial priorities<sup>9</sup>. The required accessibility score for flats and predominantly flat development would also be successively lowered.
23. The housing provision figure includes a windfall allowance of 450 dwellings (or 90 units/pa) in the 11<sup>th</sup> to 15<sup>th</sup> years of the plan. This is in recognition of the large contribution that windfalls have made to housing supply in past years (a total of 2,403 units in the period 2003 to 2008, which represents 90% of total supply in that 5 year period, an average of 480 units/pa)<sup>10</sup>.
24. There is no justification for increasing the housing supply for the district to 15,000 dwellings over the period of the plan (1,000 dwellings/pa). That order of increase would not be deliverable. It would exceed the total supply identified in the SHLAA (9,195) and would seek to build at a rate that has only exceeded 500 units/pa in 3 of the last 14 years<sup>11</sup>. Moreover, it would pay scant regard to the RSS housing target for the Greater Manchester (GM) area. The latest annual house growth forecast for GM is some 9,200 units (updated economic based forecast of the Strategic Housing Market Assessment (SHMA)-2010). Given that the RSS allocation for Stockport is some 5% of that growth (about 460 units/pa), the housing provision target

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<sup>8</sup> Paragraph 3.86 of the CS

<sup>9</sup> Paragraph 3.115 of the CS

<sup>10</sup> SHLAA 2010, paragraph 3.2

<sup>11</sup> MBC/Housing Topic Paper, paragraph 1.2

in the CS represents an appropriate and deliverable share of the GM growth target<sup>12</sup>.

25. As already mentioned, the local target is to provide 90% of new housing development on PDL. In the event that this target has to be relaxed in order to maintain a 5 year housing supply, the Council would take a sequential approach to the release of Greenfield sites. If that became necessary, open space would only be released where it is sustainable and justified and where it could be adequately replaced in accordance with PPG17<sup>13</sup>. However, the SHLAA includes enough land to meet the CS's housing requirement without the need to release Greenfield sites. Given that assessment, exceptional circumstances (PPG2<sup>14</sup>) do not arise and a change to the Green Belt boundary is not necessary<sup>15</sup>.

### ***Mix of Housing (Core Policy CS3)***

26. The housing mix proposed in the CS is for a 50/50 split between houses and flats based on the findings of the SHMA and the Housing Needs Study (HNS). The latter suggests that the greatest demand is for detached houses in terms of existing households and flats for new households. The proposed mix was criticised because it places too great an emphasis on building flats when there is evidence that the demand for flats has fallen away. The Council defends the emphasis on flats on the fact that developers have chosen to build flats in preference to houses and the SHLAA provides for 56% of dwellings in the form of flats<sup>16</sup>. The CS seeks to reduce the reliance on flats. However, in order to use land as efficiently as possible and because household size is falling, creating a rising demand for 1-2 bed units and for retirement homes, the Council is of the view that it is appropriate for a significant proportion of new housing to be in the form of flats. There is no substantive evidence to suggest that is not a sound approach.

27. Work has stopped on a number of flat developments in the district, but housing schemes are also being stalled. Evidence given at the hearing suggests that mortgage lenders are reluctant to advance loans on flat developments. That does not indicate that the demand for flats has diminished; merely that those who would wish to buy in that market are failing to secure loans. If that situation persists, then developers will naturally wish to build the type of housing for which loans can be obtained. However, that outcome is unlikely to provide the type of housing for those in greatest housing need, nor assist first time buyers to enter the housing market.

28. Woodford Aerodrome may provide scope for including houses within redevelopment of its Major Developed Sites (MDSs)<sup>17</sup> at this Green Belt location. However, overall, the effect of the difficulties in the housing market in terms of both numbers and housing mix will need to be monitored and adjustments made to policies if land use planning can address any identified imbalance in provision or housing type. Meanwhile the mix of

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<sup>12</sup> MBS/Housing Topic Paper, paragraph 1.4

<sup>13</sup> MBS/Housing Topic Paper, paragraph 4.1

<sup>14</sup> PPG2, paragraph 2.6

<sup>15</sup> MBS/Housing Topic Paper, paragraph 4.2

<sup>16</sup> MBS/Housing Topic Paper, paragraph 2.3

<sup>17</sup> CS, paragraph 3.522



housing proposed in the CS reflects HNS and SHLAA evidence. The policy is sound.

### ***Distribution of Housing (Core Policy CS4)***

29. The strategy seeks to focus housing development in the most accessible locations in the district, particularly in the Town Centre, the wider Central Housing Area, and on sites where regeneration benefits would be achieved. The proposed distribution reflects the preferences supported by the majority of consultees at the Issues and Options stage<sup>18</sup>.
30. In the event that the 5 year supply is not being maintained, the accessibility criteria would be relaxed to broaden distribution and top up supply. Much of the criticism of this part of the strategy was based on the premise that Green Belt or other Greenfield land would provide the opportunity to build houses as opposed to flats in areas that would not be as difficult to develop as Town Centre sites. I have already dealt with that proposition under Housing Provision. Moreover, the Housing Viability Study gives support to the Town Centre as a focus for new housing by pointing out that its viability should not be underplayed in providing scope to accommodate intermediate and market housing<sup>19</sup>. The proposed distribution will direct new housing to the most accessible and sustainable locations. The policy is flexible and represents a sound strand of the housing strategy.

### ***Affordable Housing (Development Management Policy H-3)***

31. This policy is supported by a recent Housing Viability Study 2010 (HVS). It seeks to achieve an overall strategic target of 50%. The target reflects the findings of the HNS. The HVS assessed the ability of different parts of the district to support Affordable Housing (AH) by reference to property prices and economic viability.
32. The threshold for seeking a contribution to AH will be 15 dwellings (gross), but in those parts where property prices are above the district average the threshold is lowered to 5 dwellings. The lower threshold is supported by the HVS and the HNS. The proportion of AH sought starts in the range 5 -15% in the Town Centre areas and Neighbourhood Renewal Areas then progresses by steps to a top rate of 40% in those parts with the highest property prices. While the policy acknowledges that it cannot realistically address the annual AH shortfall (some 519 dwellings/pa), it makes concessions to affordable housing providers to develop by releasing more land by relaxing the PDL target and/or accessibility scores of sites<sup>20</sup>.
33. The CS states that where the Council's own land is released for development, at least 50% should be affordable. That undertaking was reviewed after the plan was submitted in the light of the continuing depressed state of the housing market. The Council decided that, given the present market conditions, a more realistic approach for its own land would be to require 40% of dwellings, or as high a level as is viable, should be affordable. A Further Minor Change is proposed to reflect that decision (**FPMC/003**). I endorse the change.

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<sup>18</sup> **Outcomes from Issues & Options (2008), paragraph 6.15**

<sup>19</sup> **Economic Viability of Housing Study Addendum, paragraph 1.47**

<sup>20</sup> **MBS/Housing Topic Paper, paragraph 5.2**

34. Although the AH target appears challenging in the present economic climate, thresholds and viability will be applied on a site by site basis. This will ensure that the policy would be applied flexibly. I find that the AH provisions, as well as the entirety of the housing strategy, to be sound.

**Issue 4 – Whether the plan makes appropriate provision for employment, having regard to the needs of the district and, if necessary, the wider area.**

35. Outside the Town Centre there are some 354ha of employment land ranging between the extensive Bredbury Employment Area (110ha) to quite modest sized employment enclaves of a few hectares. In April 2010, a relatively high proportion (19%, or 67.5ha) of the total employment land bank was assessed as being available<sup>21</sup>. However, that figure contains a number of planning permissions that have yet to be implemented due to the present depressed economic climate.
36. Moreover, Stockport has to be viewed in the context of its contribution to the employment opportunities in its sub-region. A study undertaken to review the employment land position of the ten Greater Manchester authorities in terms of RSS Policy W3 concluded that overall all 10 authorities were “under supplying” in terms of their employment land allocations<sup>22</sup>. The same study suggested that Stockport is well placed to develop in growth sectors which are likely to require high density development.
37. The Council's response to these findings has been to maintain the existing employment allocations outside the Town Centre with no plans to add or subtract from them. In parallel with this, as well as the assessment of future job numbers and types, the strategy will focus on the provision of floorspace rather than land, with much of the increase in Class B1 office floorspace proposed to be located in the Town Centre.
38. The Stockport Office Study<sup>23</sup> found that, despite the Town Centre's prime location in terms of its transport links and an existing highly skilled work force, it lacked high quality office space. The strategy is to provide an increase in Class B1a/b floorspace of the order of 110,000sqm<sup>24</sup> in the district of which some 65,000sqm will be located in the Town Centre. Other sites in the M60 Gateway could accommodate up to 30,000sqm with the remainder being taken up in the established employment areas and elsewhere.
39. The supporting text to Core Policy CS7 lacks an adequate reasoned justification for the policy. The Council has provided additional text in its proposed change (**FPMC/35a**) that provides a much clearer explanation and reasoning for the policy, which I endorse.
40. Development Management Policy AED – 5 requires developers to provide training or funding to provide education and training in order to help local

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<sup>21</sup> **Stockport Land Availability Study 2010**

<sup>22</sup> **Greater Manchester Employment Land Position Statement-Nathaniel Lichfield & Partners August 2009**

<sup>23</sup> **Future Stockport – Creating a Vibrant Town Centre Office Market. DTZ 2009**

<sup>24</sup> **Greater Manchester Forecasting Model 2009-Main Outputs-Response Inspector's Initial Questions – Q 15**

residents to develop the skills required to access the new jobs to be created in the borough. Developers of small schemes might find difficulty in meeting this requirement. In recognition of that situation, the Council proposes an addition to the policy's reasoned justification to make it clear that this requirement would be applied only where it was appropriate and viable. It is also proposed to prepare SPD to set out in detail how the policy would be applied. Two additions to the text are proposed (**FPMC/037 and FPMC/038**) that provide that clarification, both of which I endorse.

41. My conclusion on this issue is that the employment strategy is sound.

**Issue 5 – Whether the strategy makes adequate provision for the Borough's retail and other needs in the Town Centre and lower hierarchy centres; whether the strategy is sound and whether the forecast expansion/extension of town centre uses and their floorspace needs can be accommodated effectively and sustainably.**

42. The Town Centre is an extensive area covering about 150ha<sup>25</sup>. It is presently defined on the UDP Review Proposals Map (PM) by allocations TCG2 and TCG3. The Council's shopping study<sup>26</sup> forecasts a potential need for an addition of some 44,500sqm of comparison floor space<sup>27</sup> and 6,500sqm of convenience floor space<sup>28</sup> for the district as at 2015. The study confirms the established UDP hierarchy of centres, which is to be carried forward in the CS, is sound<sup>29</sup>.

43. It is proposed that the majority of the additional comparison floorspace and the bulk of the convenience floorspace would be accommodated in the Town Centre. It is the Council's intention that the additional comparison floorspace should be accommodated in the Core Retail Area (CRA) based on PM area TCG2.1, through a combination of redevelopment, change of use, infill or extensions. This assessment has been challenged on the basis that the net increase within TCG2.1 would secure only about half of the additional 44,500sqm floorspace.

44. A now withdrawn mixed use scheme of some 74,000sqm, which included 40,000sqm net of comparison retail floorspace, was proposed on the 8ha Bridgefield site<sup>30</sup>. That scale of development suggests that this part of the CRA has significant scope for expansion. It is understandable that, at this stage, the Council does not wish to define too large a CRA before it has drawn up its Allocations DPD for fear that it could discourage or dilute investment in the CRA and cause it to be unnecessarily over-extended. Such an approach is in line with the goal of tightening the retail circuit<sup>31</sup> and avoiding further elongation of the Central Shopping Area (or CRA in CS terminology) so as to focus the majority of investment within the existing boundaries<sup>32</sup>. It would seem sensible to first establish how the additional floorspace could be accommodated and then make adjustments to the CRA

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<sup>25</sup> MBS/Housing Topic Paper, paragraph 3.6

<sup>26</sup> The Stockport Shopping and Leisure Study, (SSLS) Drivers Jonas, 2009

<sup>27</sup> SSLS, Appendix 9, Table 12b

<sup>28</sup> SSLS, Convenience Table 9a

<sup>29</sup> SSLS, paragraph 12.66

<sup>30</sup> SSLS, paragraphs 3.30, 3.34 and 3.35

<sup>31</sup> CS, paragraph 3.141

<sup>32</sup> SSLS, paragraph 10.60-Key Recommendations

boundary, sequentially<sup>33</sup>, at the Allocations DPD stage, if the CRA is found to be too constrained.

45. A similar approach is proposed by the Council for its lower hierarchy centres and, again, it represents a sound approach in seeking to safeguard and strengthen these service centres to await the outcome of the Allocations DPD process before deciding whether existing boundaries need to be adjusted.
46. The 280sqm net limit placed on Class A1 uses in "Other Local Centres" (DMP AS-1) and a requirement for impact assessments for Class A1 uses in excess of 200sqm net floorspace in out-of-centre and edge-of-centre locations (DMP AS-3) are guidelines. They have been drawn up based on the Council's experience and are justified by local evidence<sup>34</sup>.
47. Community uses include faith and voluntary uses. Core Policy CS5 (Access to Services) and DMP AS-2 (Improving Indoor Sports, Community & Education Facilities and their Accessibility) will determine the location of community uses, which will be encouraged to locate in Town and District Centres and, if they cannot be located there, they will be expected to follow the sequential search pattern described in paragraph 3.182 (8) of the CS. Hotels will similarly be expected to locate in the most accessible locations (Core Policy CS5 and DMP AS-4). The policies cannot be expected to cover every possible exception. If a use is unable to meet the locational criteria in a policy then other material considerations (s70 (2) of the Principal Act), might justify an exception being made.
48. I regard the strategy proposed for the Town Centre and lower hierarchy centres to be sound.

**Issue 6 – Whether the policy framework for green space/open space, its protection and provision as well as the protection of the wider environment is an appropriate reflection of the Borough's needs and opportunities.**

49. Core Policy CS8 sets out to protect and develop an integrated Green Infrastructure (GI) for the district. The main purpose of the GI is to provide a network of green space that connects ecological, historic and landscape assets that contribute to local distinctiveness and quality of life for residents and visitors. The strategy will protect strategic and local open space and landscape character areas including river valleys.
50. The evidence base includes a valid Open Space Audit that was carried out in 2005. The Council confirms that despite its age it remains a robust document since there has been no net loss of open space in the intervening years due to a policy of strongly resisting the loss of any existing public or private sports grounds<sup>35</sup>. The Council proposes to update the study as part of its preparation of the Allocations DPD.

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<sup>33</sup> PPS4, Policy EC5.2

<sup>34</sup> MBS/Retailing/Town & District Centres Topic Paper, Appendix D1, section 3 & section 7

<sup>35</sup> CS, paragraph C.6, page 161

51. It is acknowledged that there is a significant shortfall in formal sports facilities in several areas; across the borough it amounts to a shortfall of some 100ha. There are also specific spatial deficiencies in the provision of indoor sports facilities in the northern part of the borough<sup>36</sup>. In areas of deficiency, the Council will seek to secure contributions from new development to ensure the deficiency is not exacerbated.
52. Development Management Policy SIE-3 (Protecting, Safeguarding and Enhancing the Environment) as drafted does not reflect adequately the distinctiveness of the Borough's Local Landscape Character Assessment nor the requirements that applications should be considered in accordance with PPS9 (Biodiversity and Geological Conservation). The Council propose a further change to the text of the policy (**FPMC/O24**) which provides the link to the evidence base and reflects national policy. Other changes are proposed that make it clear that policies will protect and enhance landscape character, biodiversity and geodiversity (**FPMC/O17, FPMC/O18, FPMC/O21, FPMC/O22 and FPMC/O23**). I endorse the proposed changes.
53. I find that the strategy sound in respect of this issue.

**Issue 7 – Whether the plan gives sufficient guidance for the provision of transport and other infrastructure that is required to support development and the extent to which the strategy deals with the possibility that funding difficulties could lead to delays or abandonment.**

54. A schedule of infrastructure requirements that arise in order to achieve the objectives of the policies is set out at the end of each section. The schedule identifies what infrastructure is required, who will be responsible for its provision and when it is expected to be delivered. Key Infrastructure Requirements are divided into those items that are required to enable development in the first 5 years and those required for subsequent years. A more detailed explanation of infrastructure needs is provided in the Council's "Infrastructure Plan – June 2010"<sup>37</sup>.
55. The CS does not go into great detail as to how it would deal with delays or abandonment of key elements of infrastructure in the short to middle term. However, a number of improvements identified to deal with congestion are either in the process of being delivered or on course for delivery<sup>38</sup>. In the light of the Council's focus on development in the Town Centre and the Highway Agency's concerns in relation to congestion on the M60, the Council is working with other stakeholders to bring forward key transport schemes in the Town Centre, including the new interchange, improvements to Stockport station and the Stockport Town Centre access package<sup>39</sup>.
56. If non-delivery of infrastructure were to occur due, for instance, to low economic viability continuing for much longer than expected, then a review of the CS would probably be necessary regardless of its impact on infrastructure.

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<sup>36</sup> CS, paragraph 2.10

<sup>37</sup> CD/O10

<sup>38</sup> MBS response to Inspector's Initial Question (Q3) dated 20/9/10

<sup>39</sup> MBS response to Inspector's Initial Questions (Q3)

57. Core Policy CS10 (An Effective & Sustainable Transport Network) and DMP T-3 seek to prevent development taking place on disused railway alignments where they may be required for future transport use unless it can be demonstrated that there is no realistic possibility of such use<sup>40</sup>. Safeguarding land that may be required to improve the Borough's infrastructure is a legitimate planning objective whether or not it is specifically referred to in PPG13. It is justified until it is clear that the land is not required for that purpose. If safeguarding prevents development taking place the planning system has remedies available for dealing with that situation.
58. The proposed A6 to Manchester Airport Relief Road is part of the South East Manchester Multi-Modal Strategy (SEMMMS) for dealing with the traffic problems in this quadrant of the conurbation. The overall package of measures is likely to result in a small reduction in CO2 emissions<sup>41</sup>.

### **Issue 8 – Whether the strategy deals adequately with the prospective closure of the Woodford aerodrome and the future use of that Green Belt site.**

59. Woodford Aerodrome, a long established airfield and aircraft manufacturing base in the Green Belt, is due to close in 2012. It is recognised as an opportunity site covering some 205ha. Part of the site lies in Cheshire East, but the main buildings are within Stockport district. The buildings are in 2 groups and are identified as Major Developed Sites (MDSs) in the Green Belt<sup>42</sup>. The area of the combined MDSs on the Proposals Map is about 42ha compared with an estimated total footprint of buildings of some 10.4ha<sup>43</sup>.
60. PPG2, Annex C parameters will guide the future planning of the site. A minor change to the explanatory text of this section (**PMC/055**), which I endorse, confirms that it is the Council's intention to produce a Supplementary Planning Document (SPD) to consider all the evidence related to the Principles for Development set out in the CS. The CS contains sufficient strategic guidance to form the basis of a more detailed plan for the development of the site. It represents a sensible and sound way forward for determining the future of this important Green Belt site.

## **Legal Requirements**

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

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<sup>40</sup> CS, paragraphs 3.425 and 3.483

<sup>41</sup> MBS/Transport/Infrastructure Topic Paper, paragraph 7.3

<sup>42</sup> PPG2, Annex C

<sup>43</sup> MBS response to Inspector's Initial Questions (Q22)

<b>LEGAL REQUIREMENTS</b>		
<b>Local Development Scheme (LDS)</b>		<b>The Core Strategy is identified within the approved LDS November 2009 which sets out an expected adoption date of March 2011. The Core Strategy's content and timing are compliant with the LDS.</b>
<b>Statement of Community Involvement (SCI) and relevant regulations</b>		<b>The SCI was adopted in June 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed changes (PMC) and further proposed changes (FPMC). The SCI was updated in June 2010.</b>
<b>Sustainability Appraisal (SA)</b>		<b>SA has been carried out and is adequate.</b>
<b>Appropriate Assessment (AA)</b>		<b>The Habitats Regulations AA Screening Report (June 2010) sets out why AA is not necessary.</b>
<b>National Policy</b>		<b>The Core Strategy complies with national policy except where indicated and changes are recommended.</b>
<b>Regional Spatial Strategy (RSS)</b>		<b>The Core Strategy is in conformity with the RSS in respect of s24(1) of the P&amp;CP Act 2004 as amended.</b>
<b>Sustainable Community Strategy (SCS)</b>		<b>Satisfactory regard has been paid to the SCS.</b>
<b>2004 Act and Regulations (as amended)</b>	<b>and (as</b>	<b>The Core Strategy complies with the Act and the Regulations.</b>

### **Overall Conclusion and Recommendation**

62.I conclude that with the changes proposed by the Council, which go to soundness, set out in Appendix A and B, the Stockport Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. For the avoidance of doubt, I endorse the Council's proposed minor changes that do not go to soundness set out in Appendices A and B except for those in Appendix A which anticipated the revocation of the RSS. The changes for which I withhold endorsement are listed in the Council's letter dated 16 November 2010 (see Appendix C). I also withhold endorsement of Proposed Changes PMC/012, /014, /015 and /019, in part only, as described in the Council's letter.

63.I have considered all other matters raised both in writing and orally during the examination, but none lead me to a conclusion to change the plan.

*Ian Broyd*

**Inspector**

**This report is accompanied by:**

**Appendix A: Council's Proposed Minor Changes, one of which goes to soundness – August 2010**

**Appendix B: Council's Further Proposed Minor Changes, some of which go to soundness - 4 December 2010.**

**Appendix C: Copy of the Council's letter dated 16 November 2010 in response to the Cala High Court judgement.**



## Appendix A – Council's Proposed Minor Changes – August 2010

### Schedule of Minor Amendments

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## 1. Introduction

What is the Core Strategy?			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/001	Paragraph 1.7	The Stockport LDF when adopted will, <del>together with the Regional Spatial Strategy,</del> become the statutory development plan for the borough.	RSS revocation

## 2. The Need for Change

Current Picture of the Borough – The Spatial Portrait			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/002	Paragraph 2.19 & footnote 28	Stockport Town Centre is <del>defined by regional policy<sup>(28)</sup> as</del> a town centre within the Manchester City Region area, <del>prioritised, with other City Region town centres, after the city centre of Manchester in terms of development.</del> Stockport is identified as one of the areas with particularly strong demand for the release of employment land, contributing to driving forward the regional economy <sup>(28a)</sup> . <del>The town centre is listed as an area which should be promoted for retail investment and regeneration, ensuring a sustainable distribution of high quality retail facilities. The regional target for the</del>	RSS revocation

		<p><del>Borough in terms of housing delivery between 2001 and 2021 is 8,100 houses.</del> With its excellent rail and bus links, Stockport has the capacity to contribute to <i>the</i> delivery of <i>sub</i> regional aims to reduce congestion<sup>(28b)</sup> <del>on the motorway networks</del>, through promoting sustainable transport options.</p> <p><del>28a North West of England Regional Spatial Strategy Manchester Independent Economic Review, April 2009</del> available via: <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a></p> <p><del>28b Greater Manchester Strategy</del> available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a></p>	
PMC/003	Paragraph 2.34, second sentence	These areas are located to the <del>N</del> north <del>E</del> east of the borough, stretching to the border with Tameside, with good rail links into Manchester (but not Stockport) and have a varied <i>topography</i> .	Error correction – Missing word
PMC/004	Paragraph 2.34, last sentence	Industrial development has been high with some office development, concentrated around Bredbury Industrial Estate, close to Junction 25 of the M60 <del>and well served by rail terminals</del> .	Error correction – improves readability and removes superfluous reference to rail terminals (which are of no benefit to the office development)

Other Plans, Evidence and Influences			
Ref#	Paragraph / figure	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason

	number		
PMC/005	Paragraph 2.48	<p><del>Regional planning policy is contained within the Regional Spatial Strategy (RSS) for the North West which sets out the broad development framework for the Region and, since September 2004, constitutes part of the development plan.</del></p> <p><i>Regional Strategies were revoked by the Secretary of State on 6 July 2010. The evidence base prepared for the North West RSS remains an important material consideration.</i></p> <p><i>There are a number of areas where Regional Strategies supplemented the national policy framework. Further clarification on these areas is set out in a Letter to Chief Planning Officers at Local Planning Authorities in England concerning the Revocation of Regional Strategies, available at:</i>  <a href="http://www.communities.gov.uk/publications/planningandbuilding/letterregionalstrategies">http://www.communities.gov.uk/publications/planningandbuilding/letterregionalstrategies</a></p>	RSS revocation
PMC/006	Paragraph 2.49-2.56	<p>Regional Spatial Strategy for the North West</p> <p>The North West Plan <del>is a new type of document, which</del> sets out the framework for the development of the North West of England. It <del>was</del> <b>has been</b> prepared by 4NW in partnership with a wide range of authorities, voluntary groups and individuals, as the Regional Spatial Strategy for the region. <del>Government legislation requires a Regional Spatial Strategy to be prepared for each region of England.</del></p> <p><i>Local planning authorities will be responsible for establishing the right level of local housing provision in their area, and identifying a long term supply of housing land. The council has decided to retain its proposed housing targets of 450 / 495 per annum between 2011 – 2026 that are roughly in line with that set out in the revoked RSS for the North West. The government advises that Local authorities should continue to collect and use reliable information to justify their housing supply policies in line with current policy in Planning</i></p>	RSS revocation

	<p><b><i>Policy Statement 3: Housing.</i></b></p> <p><b><i>Local authorities will be responsible for determining the right level of site provision for travellers, reflecting local need and historic demand, and for bringing forward land in DPDs in line with current policy. If the council decides to review the levels of provision its Gypsy and Traveller Accommodation Assessment (GTAA) will form a good starting point. However, the council is not bound by the assessment. The government will review relevant regulations and guidance on this matter in due course.</i></b></p> <p><b><i>Minerals planning authorities will have responsibility for continuing to plan for a steady and adequate supply of aggregate minerals to support economic growth. Technical advice provided by the Aggregate Working Parties, including their current work in sub-apportioning the CLG guidelines for 2005-2020 to planning authority level will assist with this.</i></b></p> <p><b><i>Planning authorities can choose to use alternative figures for planning purposes if they have new or different information and a robust evidence base. The government will work with the minerals industry and local government to agree how minerals planning arrangements should operate in the longer term.</i></b></p> <p><b><i>Work continues on the Greater Manchester Joint Waste DPD. Government advises waste plans should provide enough land for waste management facilities to support the sustainable management of waste (including the move away from disposal of waste by landfill). Data and information prepared by partners will continue to assist in this process. For the transitional period this will continue to be the data and information which has been collated by the local authority and industry and other public bodies who currently form the Regional Waste Technical Advisory Bodies. The government intend for this function to be transferred to local authorities in due course.</i></b></p> <p><b><i>Through their local plans, government encourages authorities to contribute to the move to a low carbon economy, cut greenhouse gas emissions, help secure more renewable and low</i></b></p>	
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		<p><i>carbon energy to meet national targets, and to adapt to the impacts arising from climate change.</i></p> <p><i>Local planning authorities should continue to apply policies in PPG2: Green Belts. As part of their preparation or revision of DPDs, government advises planning authorities should consider the desirability of new Green Belt or adjustment of an existing Green Belt boundary, working with other local planning authorities as appropriate.</i></p> <p><del>The Plan sets out the scale, priorities and broad locations for future development across the region – providing a framework for where and how much development should take place. It covers a broad range of issues including housing, retail and the environment, and includes the Regional Transport Strategy. The document tries to ensure that growth and development in the North West happens in a way which improves people's lives without damaging the environment in which we live.</del></p> <p><del>RSS sets out a series of objectives which it seeks to achieve during the lifespan of RSS through a whole range of RSS policies and proposals. These objectives are as follows:</del></p> <ul style="list-style-type: none"><li><del>• improved, sustainable economic growth, closing the gap with parts of the country that have the highest economic performance;</del></li><li><del>• a more competitive, productive and inclusive regional economy, with more people in employment that uses and develops their knowledge and skills;</del></li><li><del>• the development of urban, rural and coastal communities as safe, sustainable, attractive and distinctive places to live, work and visit;</del></li><li><del>• the reduction of economic, environmental, educational, health and other social inequalities between North West communities;</del></li><li><del>• the protection and enhancement of the region's built and natural environmental</del></li></ul>	
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		<p><del>assets, its coastal areas and unique culture and heritage;</del></p> <ul style="list-style-type: none"><li><del>the active management and prudent use of our natural and man made resources, with fewer emissions of key greenhouse gases, and the most efficient use of infrastructure; and</del></li><li><del>the introduction of a safe, reliable and effective integrated transport network that supports opportunities for sustainable growth and provides beter links with jobs and services.</del></li></ul> <p><del>RSS recognises that the Manchester City Region is home to the north West's largest sub regional economy and that it represents the greatest potential for boosting economic performanace in both the North West and North of England as a whole, and for closing the gap that exists with regions in Southern England. Whilst it boasts worl-class assets like the vibrant City Centre and Manchester Airport, and many prosperous areas within the Southern Part of the City Region, it is also the scene of marked social and economic inequality and faces the challenge of regenerating communities within the surrounding inner areas and northern parts of the City Region.</del></p> <p><del>RSS specifies that most new development and investment will continue to be focused on the most accessible urban centres in the North West. Much of this will be in the cities and towns making up the three City Regions of Manchester, Liverpool and Central Lancashire. In the south and the north of the city regions, development will be focused in the important regional towns and cities, such as Stockport.</del></p> <p><del>A notable and particularly important part of RSS is that it sets out the level of housing provision that Stockport must plan for under the requirements of national Planning Policy Statement 3: Housing. In addition, RSS Policy W5 (Retail Development) seeks to enhance and encourage comparison retailing facilities in Stockport as well as at numerous other</del></p>	
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		<p><del>centres in the North West.</del></p> <p><del>Another key element of RSS is that it sets out the basis for development of a low carbon economy within the region. The north West Climate Change Action Plan (2010-2012) is one of a number of documents which sit beneath RSS; it aims to stimulate and measure the progress of England's North West towards a low carbon economy, preparing it for the challenges of a changing climate and expected future energy demands, whilst protecting and enhancing quality of life and preserving the region's rich environment.</del></p> <p>The North West RSS was adopted in September 2008 and is available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a>. <i>The abolition of Regional Strategies will require legislation in the "Localism Bill" which the government is introducing this session. After revocation, the RSS for the North West will not form part of Stockport's development plan.</i></p>	
PMC/007	Paragraph 2.87 - 2.89	<p>A new statutory Local Area Agreement (LAA) was negotiated during 2008 based on the local priorities identified within the new National Indicator Set. <i>The new National Indicator Set was abolished as part of the abolition of the Comprehensive Area Assessment (CAA) from 25 June 2010.</i> The LAA runs from 2008 through to 2011 and underpins the delivery of the Sustainable Community Strategy and the Council Plan.</p> <p>For 2009/10, the LAA includes a wider range of indicators than those originally agreed with central government. The addition of local indicators, reflecting specific local needs, will strengthen the agreement and will ensure that the agreement addresses key priorities as set out in the Storey of Place.</p> <p><del>These elements will also inform the new Comprehensive Area Assessment (CAA) which replaces the Comprehensive Performance Assessment from April 2009.</del> The Council Plan reflects the LAA in so far as the Council is responsible for the delivery of specific elements.</p>	CAA abolished from 25/06/10
PMC/008	Paragraph	<del>Stockport Housing Strategy 2005-2008</del>	A new housing

<p>2.96</p>	<p><del>Following five major surveys the housing strategy concluded that a large proportion of rented housing stock fell short of the Decent Homes Standard, that most emerging households couldn't afford market housing and many were living in inappropriate accommodation, that there was a great need to improve the energy efficiency of the housing stock and that more specialized housing was needed for people with various support needs, for homeless people and for members of the Black and Minority Ethnic Community. The Core Strategy will need to address these issues as well as having flexibility to allow issues emerging from future versions of the Housing Strategy to be addressed.</del></p> <p><i>Stockport Housing Strategy 2010-15 – A Good Place to Live</i></p> <p><i>A summary document of the key housing issues in Stockport and a set of priority objectives the Council and its partners will undertake to achieve. The priority objectives are:</i></p> <p><i>Quantity</i></p> <ul style="list-style-type: none"> <li><i>• To meet the need and aspirations for accommodation, deliver choice, and facilitate economic growth</i></li> <li><i>• To provide more affordable housing</i></li> </ul> <p><i>Quality</i></p> <ul style="list-style-type: none"> <li><i>• To improve the condition of housing in the Borough</i></li> <li><i>• To facilitate regeneration, improvement and investment in targeted neighbourhoods</i></li> <li><i>• To provide more sustainable housing</i></li> </ul> <p><i>People</i></p> <ul style="list-style-type: none"> <li><i>• To provide accommodation choice and to help to match the need and aspirations of residents to the housing offer</i></li> <li><i>• To ensure that equality and diversity is integral to all service delivery</i></li> </ul>	<p>strategy approved and published by the Council.</p>
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		<ul style="list-style-type: none"> <li>• <i>To ensure that community engagement is integral to all service delivery</i></li> <li>• <i>To ensure that social inclusion is integral to all service delivery</i></li> </ul>	
PMC/009	Paragraph 2.104 - 2.105	<p>Building Schools for the Future in Stockport: Secondary Strategy for Change 2008 (available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a>) is a consultation document that provides a background to Stockport's vision for secondary schools in the borough. It prioritises the programme on the basis that the Council's approach has been to address the needs of students from areas of highest deprivation. It identifies themes for Stockport's Building Schools for the Future (BSF) Programme, <i>which is abandoned due to the cessation of the Government's BSF Programme on 5 July 2010</i>. The document proposes that all secondary schools should become full extended schools providing a range of services and activities outside school hours for pupils, parents and the local community. <i>The Government has announced the launch of a comprehensive Review of capital investment in pre-university education through a Spending Review due in Autumn 2010. This will affect the funds available to the Council to address the inadequacy of its failing secondary building stock.</i></p> <p>A separate project on the reorganisation of provision of primary schools is being undertaken by the Council. The Council has secured £3 million per year for 12 years from 2011 onwards from the Department for Children, Schools and Families (DCSF) for improved primary school facilities following a bid for funding from the Government's Primary Capital Programme. The DCSF (now the Department for Education) funding, subject to the government's <i>regular Autumn Spending Reviews</i>, will enable Stockport to deliver its vision to create primary schools which are equipped for 21<sup>st</sup> century teaching and learning. Further information is available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a>.</p>	<p>BSF programme ceased 05/07/10.</p> <p>Government announced launch of comprehensive Review of capital investment in pre-university education.</p> <p>The Government's next Spending Review, due to conclude in the Autumn, will set spending limits for every Government department for the period 2011 –</p>

			12 to 2014 – 15 .
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### 3. The Strategy

3.2 Objectives			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text</i> , <del>red struck through for deleted text</del> )	Reason
PMC/010	Page 32, Objective 2: Housing (g)	(g) Set appropriate locational criteria to guide the provision of sufficient sites for Gypsy and Traveller, and Travelling Showpeople accommodation <del>to meet RSS pitch requirements.</del>	RSS revocation

3.3.3 PROVIDING A DECENT HOME FOR EVERYONE			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text</i> , <del>red struck through for deleted text</del> )	Reason
PMC/011	Paragraph 3.79	<del>The Regional Spatial Strategy (RSS) sets out the overall level of new housing provision for the North West and how it should be distributed across the region. Stockport is required to provide an average of 450 additional new homes a year. At least 80% of which should be on previously-developed land. New housing</del>	RSS abolition

		<p><del>provision in Stockport should support regeneration and meet local needs, in sustainable locations which are well served by public transport.</del></p> <p><i>Local authorities are responsible for establishing the right level of housing provision in their area. In line with previous development plan policies, and national policy, provision in Stockport in recent years has been focused on previously-developed land in accessible urban areas, and average completions have been in the region of 450 dwellings a year. The level of housing provision should take into account: evidence of need and demand; the availability of suitable land; the Government's ambitions for affordability; the sustainability appraisal; and infrastructure requirements.</i></p>	
<p>PMC/012</p>	<p>Paragraph 3.80</p>	<p>Affordable housing is a critical issue to address. National planning policy seeks to widen opportunities for home ownership; ensure high quality housing for those who cannot afford market housing; and improve affordability, including by increasing the supply of housing. <del>Regional planning policy acknowledges</del> <i>†The greatest need will be is</i> in areas of high demand, due to high prices and low wages, <del>and states that residential development in this part of the region will be focused on meeting local needs, particularly affordable housing.</del> The average house price in Stockport is the second highest in Greater Manchester and the ratio of lower quartile house prices to lower quartile incomes in 2008 was 7:1(footnote 45). In <del>2009</del> <i>2010</i> there were <del>8,559</del> <i>7,626</i> households on the waiting list for social housing and the estimated annual affordable housing shortfall is 519 dwellings(footnote 46). There is therefore a significant local need for affordable housing in Stockport.</p>	<p>RSS abolition</p> <p>Statistical update of waiting list number</p>

PMC/013	Paragraph 3.84	<p><del>The level of provision between 2013 and 2023 equates to a 10% increase on Stockport's current annual requirement, for a 10 year period.</del> Increasing the supply of housing <i>by 10% between 2013 and 2023</i> will improve affordability, help meet the need for affordable housing and support the delivery of additional housing growth in Greater Manchester. <del>The 10% increase will not apply if Stockport's housing requirement is increased at the regional level.</del></p>	RSS abolition
PMC/014	Paragraph 3.85	<p>Provision will be made for Gypsy and Traveller pitches and Travelling Showpeople plots, equal to the <del>respective numbers of pitches and plots required by the Regional Spatial Strategy.</del> <i>requirements identified in the latest Gypsy and Traveller Accommodation Assessment, subject to any agreed redistribution of requirements amongst local authorities within the Greater Manchester sub-region.</i></p>	RSS abolition and to reflect the agreed AGMA position in relation to the 2008 GTAA that all GM districts may need to provide some level of provision in order to facilitate a geographical spread and reflect the needs and preferences of Travelling Showpeople.
PMC/015	Paragraph 3.86	<p>The local previously-developed land target is at least 90%. This applies from 2011 onwards <i>when there is a five year deliverable supply.</i> <del>The local target</del> <i>It</i> does not apply to sites providing 50% affordable housing or more. <del>The regional</del> <i>A secondary local</i> target of at least 80% of housing provision on previously-developed land applies to sites providing 50% affordable housing or more. <i>This secondary target also applies to all sites when there is less than a five year deliverable supply, from 2011 onwards.</i></p>	RSS abolition and to provide clarity and consistency with Policy H -2 Housing Phasing, following representations from consultees (CSPub65, 83, 125, 126, 127, 128 and 161).
PMC/016	Paragraph 3.88	<p>The current Strategic Housing Land Availability Assessment(footnote 48) (SHLAA) includes a potential housing supply of 9,195 dwellings from the</p>	Reclassification of gardens as Greenfield land in re-issued PPS3

		<p>base date of April 2008 (see Table 1 'Number of additional dwellings (net) in the SHLAA (April 2008 base date)'). <b>99%</b> At least <b>95%</b> of the dwellings in the first 5 years of the SHLAA are on previously-developed land (PDL). The vast majority of these dwellings have planning permission and they are the most 'deliverable'(footnote 49) in the supply. The PDL trajectory for this period is therefore <b>99%</b> <b>95%</b>.</p>	(June 2010)																					
PMC/017	Paragraph 3.89	<p>There are <b>3,460</b> over <b>3,400</b> dwellings on PDL in years 6 to 10. This is well over a 5 year supply and is enough to provide 100% of new housing on PDL. However, the Core Strategy allows some Greenfield development, particularly where affordable housing is being provided. Therefore, the PDL trajectory is 95% to take account of this flexibility.</p>	Reclassification of gardens as Greenfield land in re-issued PPS3 (June 2010)																					
PMC/018	Paragraph 3.90	<p>There are <b>2,157</b> approximately <b>1,950</b> dwellings on PDL in years 11 to 15. This is not enough for a 5 year supply. The PDL trajectory has therefore been lowered to <b>90%</b> <b>85%</b>. The percentage would be less but for expected excess completions in earlier years.</p>	Reclassification of gardens as Greenfield land in re-issued PPS3 (June 2010)																					
PMC/019	Table 1	<p>• Table 1 Number of additional dwellings (net) in SHLAA (April 2008 base date)</p> <table border="1"> <thead> <tr> <th>Time Period</th> <th>Number of Specific Sites</th> <th>Number of Dwellings</th> <th>Number of Houses</th> <th>Number of Flats</th> <th>% PDL*</th> <th>PDL Trajectory</th> </tr> </thead> <tbody> <tr> <td>0 to 5 years</td> <td>219</td> <td>2394</td> <td>686</td> <td>1708</td> <td><b>99%</b> <b>95-96%</b></td> <td><b>99%</b> <b>95%</b></td> </tr> <tr> <td>6 to 10</td> <td>178</td> <td>4071</td> <td>2010</td> <td>2061</td> <td><b>85%</b></td> <td><b>95%</b></td> </tr> </tbody> </table>	Time Period	Number of Specific Sites	Number of Dwellings	Number of Houses	Number of Flats	% PDL*	PDL Trajectory	0 to 5 years	219	2394	686	1708	<b>99%</b> <b>95-96%</b>	<b>99%</b> <b>95%</b>	6 to 10	178	4071	2010	2061	<b>85%</b>	<b>95%</b>	RSS abolition and reclassification of gardens as Greenfield land in re-issued PPS3 (June 2010)
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0 to 5 years	219	2394	686	1708	<b>99%</b> <b>95-96%</b>	<b>99%</b> <b>95%</b>																		
6 to 10	178	4071	2010	2061	<b>85%</b>	<b>95%</b>																		

		<table border="1"> <tr> <td>years</td> <td></td> <td></td> <td></td> <td></td> <td>84%</td> <td></td> </tr> <tr> <td>11 to 15 years**</td> <td>121</td> <td>2730</td> <td>1389</td> <td>1341</td> <td>79% 71-73%</td> <td>90% 85%</td> </tr> <tr> <td>Total</td> <td>518</td> <td>9195</td> <td>4085</td> <td>5110</td> <td>87% 83-84%</td> <td></td> </tr> <tr> <td>Supply***</td> <td></td> <td>20.4 19.2 years</td> <td>18.2 17.0 years</td> <td>22.7 21.3 years</td> <td></td> <td></td> </tr> </table> <p>* Column contains estimated revisions to the PDL figures in the SHLAA following reclassification of gardens as Greenfield land in re-issued PPS3 (June 2010)</p> <p>** Includes a windfall allowance of 450 dwellings – made up of 180 houses and 270 flats</p> <p>*** At the <del>RSS</del> an annual average target of 450 480 dwellings (7,200 divided by 15) – made up of 225 240 houses and 225 240 flats</p>	years					84%		11 to 15 years**	121	2730	1389	1341	79% 71-73%	90% 85%	Total	518	9195	4085	5110	87% 83-84%		Supply***		20.4 19.2 years	18.2 17.0 years	22.7 21.3 years			
years					84%																										
11 to 15 years**	121	2730	1389	1341	79% 71-73%	90% 85%																									
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Supply***		20.4 19.2 years	18.2 17.0 years	22.7 21.3 years																											
PMC/020	Paragraph 3.92	<p><del>Stockport's RSS</del> The housing requirement target is 6,750 7,200 dwellings between 2011 and 2026 (although the strategy seeks a 10% increase between 2013 and 2023). Without the 20 Green Belt sites referred to above the estimated housing supply in 2011 is 7,536 dwellings. Given that this is only 12 5% above the <del>RSS requirement target</del> it may be necessary to release Green Belt land for housing if other sites in the SHLAA are not</p>	RSS abolition																												



		developed at the point envisaged.	
PMC/021	Paragraph 3.94	The overall strategic affordable housing target is 50% of total provision. The Council will aim to achieve this challenging target with the assistance of Stockport Homes and developments by other affordable housing providers <i>delivering up to 100% affordable housing</i> ; by maximizing opportunities offered by Council owned land; etc...	For clarity
PMC/022	Paragraph 3.104	...Such sites will not be allocated <del>solely</del> <i>solely</i> to achieve the housing trajectory's increased level of provision between 2013 and 2023...	Spelling mistake
PMC/023	Paragraph 3.105	<p><i>The focus is on making effective use of land within accessible urban areas. The priority for development is therefore previously-developed land within urban areas.</i> Urban Greenfield and Green Belt development should accord with the following sequential approach:</p> <p>firstly, the use of accessible urban sites that are not designated as open space, or considered to be areas of open space with amenity value;</p> <p><i>secondly, the use of private residential gardens in accessible urban locations where proposals respond to the character of the local area and maintain good standards of amenity and privacy for the occupants of existing housing, in accordance with Development Management Policy H – 1 'Design of Residential Development';</i></p> <p><del>secondly</del> <i>thirdly</i>, the use of accessible urban open space...</p> <p><del>thirdly</del> <i>fourthly</i>, and only if it is essential to release additional land to accommodate the borough's local needs, particularly the need for affordable housing or to support regeneration strategies in</p>	The first change is made for clarity. The second change to incorporate gardens into the sequential approach now they are excluded from the definition of previously-developed land in the re-issued PPS3 (June 2010).

		Neighbourhood Renewal Priority Areas, a limited number of the most suitable Green Belt sites will be used for housing. Sites must be accessible, attached to the urban area, <i>maintain openness between built-up areas</i> , and there must be no exceptional substantial strategic change to the Green Belt or its boundaries.	
PMC/024	Paragraph 3.107	When considering Green Belt release, regard will be had to, amongst other things: maintaining openness; the purposes of including land in Green Belts ( <i>including preventing neighbouring towns from merging into one another</i> ); the Green Belt land use objectives; and the need to provide clearly defensible boundaries.	For clarity
PMC/025	Paragraph 3.115	When there is less than a five year deliverable supply during the first ten years of the plan period, Stockport's <del>regional</del> <i>secondary</i> previously-developed land target of 80% will apply to all developments. The required accessibility score...	RSS abolition
PMC/026	Paragraph 3.119	To ensure Core Policy CS 4 'Distribution of Housing' is delivered and all housing development is genuinely accessible by public transport, walking and cycling to jobs, community facilities, shops and services. <del>In line with the Regional Spatial Strategy, d</del> Development is partly focused in and around the centre of town <i>because</i> <del>the</del> Sustainable Community Strategy seeks a vibrant Town Centre that is well used by residents, and it makes it a priority for development. The evidence...	RSS abolition
PMC/027	Paragraph 3.125	The proportion of affordable housing sought varies across the borough to take account of property prices and economic viability. Subject to viability, <i>the Council will negotiate to achieve</i> the following proportions of	For clarity

		<p><i>affordable housing apply</i> and <i>these</i> should be reflected in the cost of land: - 5%-15% in the Town Centre areas etc...</p>	
PMC/028	Paragraph 3.131	In April <del>2009</del> 2010 there were <del>8,559</del> 7,626 households on the Stockport Homes waiting list for social rented housing.	Statistical update of waiting list number.
PMC/029	Paragraph 3.133	The site size thresholds and the proportions of affordable housing sought through developer contributions are broadly in line with the recommendations of the Economic Viability of Housing Study (footnote 63). 40% affordable housing is sought in 'very hot' areas because the study found this to be viable under certain conditions and Case Study 1 supports this (footnote 64). 30% affordable housing is sought in 'hot' areas because <i>although</i> the study <i>recommended a contribution of 35%, no sites for 5 or more dwellings could provide this under 'rising' market conditions with a 50:50 tenure split between intermediate and social rented housing.</i> The study found <del>this</del> 30% to be viable in 'hot' areas under certain conditions and Case Study 2 supports this (footnote 65). 20-25% affordable housing is sought in 'moderate' areas because the study found this range to be viable under certain conditions (footnote 66).	To provide additional clear justification of policy
PMC/030	Paragraph 3.134	In the Town Centre there is a more flexible approach to affordable housing to take into account both the limited viability that currently exists and the future potential of the Town Centre. The 5 to 15% range sought is supported by the findings <i>and recommendations</i> contained in the addendum to the Economic Viability of Housing Study (e.g. Town Centre Case Study 1 <i>and paragraphs 1.41-1.47</i> ). A similar approach is taken in the Neighbourhood Renewal Priority Areas with the lowest property prices.	To provide additional clear justification of policy

PMC/031	<b>Evidence</b>	<ul style="list-style-type: none"> <li>• Greater Manchester Strategic Housing Market Assessment 2008 <i>and update report 2010</i></li> <li>• Greater Manchester Gypsy and Traveller Accommodation Assessment 2008</li> <li>• etc...</li> </ul>	<b>Update report published by AGMA.</b>
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3.3.4 ACCESS TO SERVICES			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/032	Paragraph 3.155	The Core Strategy will facilitate the provision of an adequate supply of suitable land in appropriate locations for cemetery <del>and crematoria</del> development and ancillary facilities to meet the needs of the borough's population through the plan period.	<b>Error Correction: The related Development Management policy does not cover crematoria development and the Council burial authority has not expressed a need for crematoria development.</b>
PMC/033	Paragraph 3.165	The scale of future retail development in Stockport needs to respect that <del>Manchester/Salford are the primary retail centres</del> <i>City Centre is at the top of within the Manchester City Region.</i> <del>Comparison retailing facilities in Stockport should be enhanced and encouraged in order to ensure a sustainable distribution of</del>	<b>RSS revocation</b>

		<p><del>high quality facilities</del> <i>hierarchy of centres within the Greater Manchester area. PPS4 indicates town centres are usually the second level of centres after city centres. The encouragement and enhancement of high quality comparison retailing facilities in Stockport Town Centre is sought<sup>(76)</sup>, thereby contributing to a sustainable distribution of retail facilities as promoted in PPS4.</i></p>	
PMC/034	footnote 76	<p><del>RSS Policy W5 (Retail Development), available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a></del></p> <p><i>Stockport Shopping and Leisure Study, page 113, available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a></i></p>	RSS revocation
PMC/035	Paragraph 3.166	<p>Within the Town Centre, where possible, main town centre uses, A2 use, public and community uses (including A1 use where it complies with the Development Plan, <del>RSS Policy W5: Retail Development</del> and PPS4) should positively contribute to linked trip opportunities, the integration or co-location of service delivery or provide significant regeneration and environmental benefits.</p>	RSS revocation
PMC/036	Paragraph 3.169	<p>Thus, this approach will improve comparison retailing facilities in Stockport Town Centre, <del>consistent with RSS Policy W5 (Retail Development)</del>, by focusing the majority of retail floorspace growth, medium sized and larger</p>	RSS revocation

		retail units in the core retail area.	
PMC/037	Paragraph 3.181 Target 9	<del>NI 15 Serious Violent Crime in the Town Centre – a 15% reduction over 2 years, monitored by GMP.</del>	CAA abolished from 25/06/10 – there is no certainty that GMP will continue to collect this data and, in any case, there are other monitoring indicators for this policy
PMC/038	Paragraph 3.187	The purpose of the policy is to facilitate improvements to the quality of indoor sports, education and community facilities (including health care facilities) and their accessibility, <del>consistent with RSS Policy L1: Heath, Sport, Recreation, Cultural and Education Services Provision.</del>	RSS revocation
PMC/039	Paragraph 3.189 – 3.190	<del>Stockport is currently on the list of authorities awaiting entry into the national Building Schools for the Future (BSF) programme. There are grave concerns that the national scheme may not continue in its present form because of issues around public funding, but if it does then through the scheme Stockport may have access to around £165 million, to which the Council would be expected to contribute a further £35 million, making it a £200 million programme. Partnership for Schools (PFS) is the Government agency that delivers BSF for the Government and they will expect the creation of a Local Education Partnership (arm's length company) to deliver the Stockport BSF scheme<sup>(90)</sup>. Currently PFS are not inviting authorities to submit BSF applications until the 2010-11 financial year, so the Council cannot expect a call for a Readiness to Deliver document until</del>	BSF Programme ceased 05/07/10  <a href="http://www.education.gov.uk/news/news/bsf-review">http://www.education.gov.uk/news/news/bsf-review</a>  Government announcement of launch of

		<p><del>summer 2010 at the earliest.</del></p> <p><del>If the opportunity to submit is offered, Stockport has made informal links with Bury over a joint Local Education Partnership, which would offer some savings for Stockport's scheme. If entry to BSF can then be secured, building work would commence in 2014. Stockport will need three phases of BSF work and all BSF schemes are expected to be completed by 2022. However, as a result of this delay, the</del> <i>The</i> Council faces significant issues in addressing the inadequacy of its failing secondary school building stock which has an estimated repairs backlog of £47 million<sup>90</sup>. In addition, the issue of excessive surplus places will need to be tackled between the summer and autumn of 2010.</p> <p><i>The Government is undertaking a comprehensive Review of all capital investment in schools, early years, colleges and sixth forms. The review will guide future Government spending decisions over the next Spending Review period (2011-12 to 2014-15).</i></p>	comprehensive Review of capital investment in pre-university education.
PMC/040	Paragraph 3.196, bullet point 4	Aspire to achieve quality indoor sports hall provision in partnership <i>with the</i> education <i>sector</i> <del>(e.g. BSF Programme)</del> and where possible and appropriate, with other stakeholders e.g. NHS Stockport etc.	BSF programme ceased 05/07/10
PMC/041	Paragraph 3.200	It is accepted that there may be some instances where A1 use proposals comply with PPS4 <del>and RSS Policy W5</del> with regard to the sequential	RSS revocation

		<p>approach, scale, impact considerations and accessibility and therefore demonstrably cannot be accommodated within the relevant service centre(s) of Stockport's service centre hierarchy. In such circumstances, such A1 use retail development may be required outside the service centres in order to help meet identified retail needs and address any local deficiencies in retail provision.</p>	
PMC/042	Paragraph 3.209	<p>Tourism development will be focused on the service centre hierarchy, with exceptions being only where proposals comply with PPS4 <del>and the RSS</del> and where locations directly relate to features of interest outside of these areas that are sustainably accessible or made so by the development. Such development, especially when it is within the rural parts of the borough, will also afford opportunities for ecological, landscape, biodiversity and heritage improvement, for which developer contributions may be sought.</p>	RSS revocation
PMC/043	Development Management Policy AS – 3, AS – 4 and AS – 5: Indicators and targets	<p>The titles 'Indicators' and 'Targets' should be given paragraph numbers</p>	Error correction. This will have a knock on effect on all paragraph numbers thereafter
PMC/044	Page 86 Key Infrastructure Requirements table, first row	<p>Stockport Sports Trust runs and manages 15 sports, swimming and leisure facilities in the borough. <i>The</i> education <i>sector</i> is likely to be the main partner for future provision. There may be</p>	<p>BSF programme ceased 05/07/10 Government announcement of launch of comprehensive Review of capital investment in pre-</p>



		scope for delivery / funding through <del>BSF</del> <i>the Government's capital investment in schools, colleges and sixth forms which is under review</i> and developer contributions.	university education.
PMC/045	Page 85 Title 'CEMETERIES AND CREMATORIA'	CEMETERIES <del>AND CREMATORIA</del>	The policy does not cover crematoria development
PMC/046	Paragraph 3.218, indicator 1	Supply of land for cemetery <del>and crematoria</del> provision	The policy does not cover crematoria development

3.3.5 ACCOMMODATING ECONOMIC DEVELOPMENT			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/047	Paragraph 3.222	Stockport has been identified in <del>both the Regional Spatial Strategy(106) (RSS) and</del> the Manchester Independent Economic Review(107) (MIER) as being a key location for economic development in a variety of sectors.	RSS Revocation
PMC/048	Footnote 106	<del>North West of England Plan, Regional Spatial Strategy to 2021, Policies MCR1 and MCR3</del>	RSS Revocation
PMC/049	Paragraph 3.229	The provision of employment land in the borough forms part of a greater portfolio for the sub-region which tries to ensure there is sufficient employment land to meet the needs of developers, <i>taking into account predictions of future job numbers and types. As a result of that and other</i>	RSS Revocation

		<p><b>work undertaken on employment land supply across Greater Manchester <sup>(108)</sup> the town centre approach is focussed towards floorspace provision. <del>and try to achieve the employment land figure set out in RSS Policy W3. Work commissioned to look at that figure <sup>(108)</sup> found that overall the ten authorities were likely to under-supply employment land in relation to that policy. However it also concluded that the total supply figure was outdated for a number of reasons. As a result of that work and an assessment of future job numbers and types Stockport's town centre approach is focused towards floorspace rather than land provision.</del></b></p>	
PMC/050	Core Policy Title	Core Policy CS <b>7</b> <del>Core Policy 1</del>	Error correction. This will have a knock on effect on all Core Policy numbers thereafter
PMC/051	Paragraph 3.232	Office and other types of B1 development will also be encouraged in the M60 Gateway, taking advantage of the location close to the Town Centre, thus helping to develop an agglomeration of similar sites. This will enable Stockport to develop land for the growth sectors identified in MIER <del>and RSS</del> , including taking advantage of the predicted growth at Manchester Airport.	RSS Revocation

3.3.8 Stockport Town Centre Strategic Location			
Ref#	Paragraph / figure number	Changed wording ( <b><i>green italics to indicate new text</i></b> , <del>red struck through for deleted text</del> )	Reason

PMC/052	Paragraph 3.498	<p><del>The Regional Spatial Strategy(131) identifies Stockport as one of a number of centres in the North West where comparison retailing facilities should be enhanced and encouraged to ensure a sustainable distribution of high quality retail facilities.</del></p> <p>Government objectives in PPS4 indicate local authorities should deliver sustainable patterns of development, including shopping, leisure and local services.</p>	RSS Revocation
PMC/053	Footnote 131	<del>North West of England Plan, Regional Spatial Strategy to 2021, Policy W5 (Retail Development)</del>	RSS Revocation

3.3.9 Woodford Aerodrome Opportunity Site			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/054	Paragraph 3.512	<del>The Regional Spatial Strategy (137) states that a strategic review of the Green Belt in Greater Manchester, including Stockport, is not necessary until at least 2011.</del>	RSS Revocation
PMC/055	Additional paragraph after 3.514	<i>The Council considers that the development of a more detailed plan for the site can be best achieved through a Supplementary Planning Document (SPD) which will consider all of the evidence available and which will be based on the Principles of Development set out below.</i>	To update agreed position in relation to the approach to the Opportunity Site
PMC/056	Footnote 137	<del>North West of England Plan, Regional Spatial Strategy to 2021, Policy RD4</del>	RSS Revocation

PMC/057	Paragraph 3.523	The development of a large site such as this would <del>not only</del> help to provide a significant location for jobs in the borough. <del>but would also help towards providing land required in the Greater Manchester area, as required by Regional Spatial Strategy.</del>	RSS Revocation
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*Appendix C Additional Information for Core Policies and Development Management Policies*

C.4 The general distribution of Green Infrastructure			
Ref#	Paragraph / figure number	Changed wording ( <i>green italics to indicate new text, red struck through for deleted text</i> )	Reason
PMC/058	C.4	<i>Waterway (canals and rivers)</i>  N.B. The diagram needs amending to add in these features.	Error correction

## Appendix B – Council's Further Proposed Minor Changes – December 2010

### Schedule of Further Proposed Minor Changes

Updated 4<sup>th</sup> December 2010

The following changes are proposed by the Council either within its Statements and Topic Papers submitted in response to the Matters and Issues for Examination, or as a result of subsequent consideration following requests from the Inspector for clarification of points raised within those Statements / Topic Papers. This schedule should be read in conjunction with the Matters and Issues for Examination document (<http://www.stockport.gov.uk/2013/2994/developmentcontrol/planningpolicy/LDF/exam1-mattersandissues?view=Standard>) and the Council's Statements and Topic Papers (<http://www.stockport.gov.uk/services/environment/planningpolicy/ldf/dpd/eipstatementsandtopic>). When referring to these proposed changes the reference number (FPMC/###) should be used.

Additionally there are a number of other Further Proposed Minor Changes which are required to correct drafting errors or are proposed as a result of discussion at the EiP Hearing Sessions.

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[Issue \(D\)23](#)

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1

Matter A: Strategy and Overarching Principles: Sustainable Development Addressing Inequalities and Climate Change.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (A)30		
FPMC/001	Objective 3, first paragraph	The Core Strategy aims to create a prosperous and diverse economy with a range of accessible and suitable employment sites to attract inward investment, <i>meet the needs of indigenous businesses and</i> <del>in order to</del> assist in achieving the sustainable regeneration of the borough and the sub-region by:...

Matter B: Housing.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issues (B)5-6, (B)47, (B)50-54, (B)58		
FPMC/002	Paragraph 3.108	<del>1. accessible by public transport;</del> <b>21. reasonably accessible to local services...</b>

Matter B1: Affordable Housing.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issues (B1) 10-13, (B1) 59-60		
FPMC/003	Paragraph 3.123	<del>At least 50%-40%</del> of dwellings on Council sites should be affordable, <i>or as high a level as is viable, having regard to the creation of mixed, balanced communities.</i> Should any urban open space...
FPMC/004	Paragraph 3.125 First bullet point	5%-15% in the Town Centre areas <sup>(61)</sup> and the other Neighbourhood Renewal Priority Areas of Adswold and Bridgehall, <del>Brinnington,</del> and Lancashire Hill and Heaton Norris ( <i>see below for Brinnington</i> ).
FPMC/005	Paragraph 3.128	In Neighbourhood Renewal Priority Areas, housing development should accord with local regeneration strategies, such as <del>the Brinnington Masterplan</del> <i>area masterplans.</i> <del>Housing choice in these areas should</del>



Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
		<del>be improved</del> <i>A choice of quality homes that meet the needs of residents should be provided in these areas</i> by increasing the supply of market housing and intermediate affordable housing, to create more mixed, balanced communities. <i>In Brinnington, developer contributions to affordable housing will not be sought unless the development is of a sufficient scale and mass to achieve an uplift in values that makes affordable housing viable without grant funding. However, as in other priority areas, intermediate affordable housing to rent or part own (with grant), as well as market housing, is still encouraged in order to diversify housing type and tenure.</i>
FPMC/006	Paragraph 3.132	The Council should set a good example by making the most of the opportunity to provide affordable housing on land it sells for housing. <i>40% affordable housing is sought on Council sites because the Economic Viability of Housing Study found 45% to be unviable under 'rising' market conditions, except on sites providing less than 5 dwellings. (Insert footnote: Economic Viability of Housing Study 2010 available via <a href="http://www.stockport.gov.uk/ldfevidence">www.stockport.gov.uk/ldfevidence</a> figures 6.22-6.27 pages 80-84).</i> There is <del>also</del> the opportunity to at least match the strategic target...
FPMC/007	Paragraph 3.134	A similar approach is taken in the Neighbourhood Renewal Priority Areas <del>with the lowest property prices of Adswood and Bridgehall, and Lancashire Hill and Heaton Norris.</del>

Matter C: Employment.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (C)17		
FPMC/008	Development Management Policy AED5	Change has now been superseded by FPMC/037 (see below).
Issue (C)62		
FPMC/009	Paragraph 3.227	Forecasts indicate that the recovery will be steady and that the focus for new employment floorspace will be for B1 uses, particularly office development. In the period <del>up to</del> <i>2011-2026</i> approximately 110,000sqm of B1a/b floorspace will be required.
FPMC/010	Paragraph 3.237	Whilst it is acknowledged that the <i>net</i> level of heavy industrial uses <del>is are</del> likely to decline in the Borough, <i>new units are still likely to be required. Consequently</i> such uses will still need to be

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
		provided for and <del>as such</del> <i>existing employment areas are considered to be the appropriate locations sites will need to be found</i> to accommodate <del>this</del> <i>these</i> , as well as the moderate rise in warehousing development.
Issue (C)64		
FPMC/011	Development Management Policy AED6	c) the loss of employment land would not lead to significantly longer journey to work patterns; <i>and</i> d) the development does not conflict with other policies.

Matter D: Retailing / Town and District Centres.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (D)67		
FPMC/012	Paragraph 3.192	The PPG 17 study 'Indoor facilities' <sup>(92)</sup> report identifies an 11½ four court sports hall shortfall based on the exclusion of dual-use facilities within Stockport <del>and an excess supply of wet facilities.</del>
Issue (D)68		
FPMC/013	Glossary	Additional term: <i>Indoor sports facilities</i> Explanation: <i>Indoor sports facilities includes sports halls, sports stadia, swimming baths and gymnasiums.</i>
FPMC/014	Paragraph 3.149	The Core Strategy will promote and safeguard a broad range and distribution of accessible, quality indoor sports <del>halls</del> <i>facilities</i> and community uses across the borough...
FPMC/015	Paragraph 3.151	The overall level of indoor sports <del>hall</del> <i>facility</i> provision across the borough will be safeguarded and criteria for the location of any new provision is set out in Development Management Policy 'Improving indoor sports, community and education facilities and their accessibility'. PPG17 and PPS4 indicate that locations in or adjacent to existing centres are considered appropriate for indoor sports <del>halls</del> <i>facilities</i> . Community uses are directed to relevant centres in the service centre hierarchy in the first instance, with flexibility of location for new and extensions to existing indoor sports <del>halls</del> <i>facilities</i> allowed in connection with schools, other educational establishments and premises providing dual-use facilities. Exceptions are also permitted where the indoor sports <del>hall</del> <i>facility</i> is sustainably accessible to the communities it serves, especially where the proposal would help to address inequalities.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (D)77		
FPMC/016	Paragraph 3.268	...Such circumstances will only be considered acceptable where the study identifies a relative higher provision of recreational open space within an Area Committee area <i>compared to other Area Committee areas in the borough</i> . Any development resulting in a loss of open space within an area of relative high-levels of provision will be expected to off-set that loss by making improvements to existing open space or providing (at least) equivalent new open space in a <del>an</del> <i>Committee</i> area of relative low provision so as to help not exacerbate the under-supply situation that exists across the borough as a whole.

Matter E: The Environment / Open Space.

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (E)82		
FPMC/017	Paragraph 3.273	Development will be expected to make a positive contribution to the protection and enhancement of the borough's natural environment, <del>and</del> biodiversity <i>and geodiversity</i> .
Issue (E)83		
FPMC/018	Objective 5(b)	Protecting and enhancing the borough's biodiversity <i>and geodiversity</i> including its sites of national and regional nature conservation importance and the green corridors within urban areas;
FPMC/019	Objective 5(e)	Providing green infrastructure, civic spaces and public realm that are well designed, safe and accessible, sufficient to satisfy the recreational, leisure, health and amenity requirements of the population, which <i>can adapt to the needs of and which</i> help mitigate the impacts of climate change and which improve health;
FPMC/020	Objective 6	Additional sub-objective: <i>Providing and improving a network of safe, good quality walking and cycling routes and ensuring provision of appropriate facilities for sustainable transport users.</i>
Issue (E)84		
FPMC/021	Paragraph 3.263	The Council working with local communities, developers and partners, will protect, <del>and</del> develop <i>and enhance</i> an integrated network of high quality and multi-functional GI that will:
Issue (E)85		
FPMC/022	Paragraph 3.270	The landscape and character of the borough's countryside will be <del>protected</del> , <i>preserved and enhanced</i> , taking into account the distinctive attributes of local areas based on a landscape character assessment (including an assessment of the historic landscape character).
Issue (E)86		

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
FPMC/023	Paragraph 3.284	<p>The site's characteristics including landform, landscape, views or vistas (including to/from the Peak District National Park), landmark or gateway features, <b>ecology, biodiversity</b> and micro-climate as well as the site's context in relation to the surrounding buildings and spaces (particularly with regard to the height, density and massing of buildings);</p>
Issue (E)87		
FPMC/024	Paragraph 3.322	<p><del>Development which involves loss of ecologically significant natural habitat or adversely affects the integrity or continuity of landscape features will only be permitted if it can be shown that:</del></p> <ol style="list-style-type: none"> <li><del>1. The development will result in community benefits that clearly outweigh such losses and/or the need to retain such features;</del></li> <li><del>2. Mitigating measures are provided which are within the control of the developer, which would reinstate, or compensate for, ecological losses and which would ensure the integrity and continuity of ecological and landscape features; and</del></li> <li><del>3. If it is liable to cause harm to a legally protected species or its habitat, it can be demonstrated by the applicant, that any impact can be successfully mitigated and monitored and that measures will be put in place to secure the protection of the species.</del></li> </ol> <p><i>The borough's varying urban and rural landscapes, biodiversity, geodiversity and soils combine to create a unique and distinctive local character of considerable value to residents and visitors alike. This locally distinctive sense of place and character will be maintained and enhanced as follows:</i></p> <ul style="list-style-type: none"> <li><i>• The Borough's urban and rural landscapes will be conserved and enhanced in line with the borough's Landscape Character Assessment. The current preliminary assessment detailed in the Stockport UDP Review will be reviewed so as to inform the Allocations DPD and the future consideration of development proposals. This will ensure that the landscape as a whole can be managed, protected and enhanced;</i></li> <li><i>• Net loss of biodiversity and geodiversity will be prevented by applying a hierarchical approach to conserving and enhancing the network of nationally, regionally and locally designated sites and habitats;</i></li> <li><i>• Applications for development that would result in harm to the borough's biodiversity and geological conservation interests will be determined in accordance with the key principles set out in PPS9 (Biodiversity and Geological Conservation) and in particular sub-paragraph 1(vi); and</i></li> </ul>

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
		<ul style="list-style-type: none"> <li><i>Opportunities and locations for biodiversity enhancements will be identified and pursued by the creation, protection, enhancement, extension and management of green corridors and through the development of green infrastructure networks in urban and rural areas to improve connectivity between habitats.</i></li> </ul>
Issue (E)92		
FPMC/025	Paragraph 3.324 (criteria)	<del>1.</del> • Proposals are accompanied by a woodland management plan; <del>2.</del> • The woodland is of a scale capable of absorbing the proposal without damage; and <del>3.</del> • There is no adverse effect on the integrity of an Ancient Woodland.

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#### Matter F: Transport/Infrastructure

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (F)103		
FPMC/026	Paragraph 3.439	Where feasible, freight will be transported by rail or pipeline <i>and opportunities to link with inland waterway freight interchanges should also be explored.</i>
Issue (F)104		
FPMC/027	Paragraph 3.421	Walking and cycling networks are often able to make use of disused rail alignments and other former transport corridors (e.g. former canals). Where such potential exists routes will be safeguarded as appropriate but should not prejudice their future use as public transport corridors. <i>Similarly canal towpaths provide potentially important walking and cycling links for both leisure and functional purposes and the Council will continue to seek opportunities to improve these as part of the wider off road network.</i>

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#### Matter H: Miscellaneous

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (H)111		

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
FPMC/028	Key diagram	Add Stockport's waterways to the diagram.

### Changes Proposed to Correct Drafting Errors

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )	Reason
FPMC/029	Core Policy within section 3.3.6 Safeguarding and Improving the Environment (begins page 97)	Core Policy CS <del>7</del> 8	To correct sequential numbering of Core Policies following Proposed Minor Change PMC/050
FPMC/030	First Core Policy within section 3.3.7 Transport (page 124)	Core Policy CS <del>8</del> 9	
FPMC/031	Second Core Policy within section 3.3.7 Transport (begins page 124)	Core Policy CS <del>9</del> 10	
FPMC/032	Core Policy within section 3.3.8 Stockport Town Centre Strategic Location (begins page135)	Core Policy CS <del>10</del> 11	

### Changes Proposed as a Result of Discussion at the EiP Hearing Sessions

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
Issue (A)1		
FPMC/033	Policy SD – 1 Additional paragraph before 3.12	<i>Across the Borough as a whole development which is demonstrated to assist in the creation of Sustainable Communities will be given favourable consideration so long as it is in compliance with other development plan policies.</i>
Issue (A)2		
FPMC/034	Policy SD4, Paragraph 3.48	The Council is keen to take advantage of opportunities to install district heating across the Borough. New development in 'Network Development Areas', where <del>possible,</del> <i>technically feasible and financially viable</i> , should contribute to this objective by considering district heating <del>as their first option</del> for meeting the requirements of Development Management Policy SD – 3 'DELIVERING THE ENERGY OPPORTUNITIES PLANS – NEW DEVELOPMENT'...
Issue (C14)		
FPMC/035a	Additional text after paragraph	<i>Within Stockport there is a variety of employment areas that have functioned well</i>

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
	3.224	<p><i>historically, notwithstanding periods of economic downturn. Outside of the town centre these provide some 354 Ha of employment land in total and include a range of size from a few hectares up to 110 Ha in the case of Bredbury Employment Area. These sites are also located in a variety of areas, some close to the M60, others located between areas of predominantly residential development, such as in Reddish.</i></p> <p><i>As a result, these areas provide a good choice of land for potential developers of all key employment uses. Stockport's employment land availability information<sup>(108)</sup> indicates that these areas have performed well historically and that most of the employment development that takes place within the Borough takes place on existing sites within these areas, pointing to a high degree of 'churn'.</i></p> <p><i>As of April 2010 that same land availability information found approximately 67.5 Ha of land was available, which is a relatively high percentage of the total employment area of 354 Ha (approximately 19%). However this figure is relatively high due to the number of permissions which are yet to be implemented due to the prevailing economic conditions. In previous years as land has been developed the amount of available employment land has been lower yet has generally provided sufficient opportunity and choice for developers.</i></p> <p><i>The provision of employment land in the borough forms part of a greater portfolio for the sub-region which tries to ensure there is sufficient employment land to meet the needs of developers and try to achieve the employment land figure set out in RSS Policy W3. Work commissioned to look at that figure<sup>(109)</sup> found that overall the ten authorities were likely to under-supply employment land in relation to that policy. Stockport is one of those authorities identified as 'under-supplying' for the sub-region. However the study also concluded that Stockport is forecast to develop in growth sectors which are likely to require high-density development. Furthermore it is recognised that in addition to the B-use classes, land previously used for those uses will be required for other sectors of economic development, e.g. medical facilities, training centres.</i></p>

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
		<p><i>Given that the employment areas have generally functioned well and have fulfilled the employment needs of the borough and the sub-region, there is no need to add or subtract employment land to any significant degree. As a result of this and the assessment of future job numbers and types, Stockport's approach is focused towards floorspace rather than land provision, with much of the B1 office space to be located in the town centre with high density development.</i></p> <p><i>The town centre currently suffers from a lack of high-quality office space, as identified by the Stockport Office Study<sup>(110)</sup> yet is located in a prime position in respect of its transport links and an existing highly skilled workforce. The focus of new employment development, particularly B1 office space, is a key factor where a change of approach would help to achieve the overall objectives of the Core Strategy.</i></p> <p>Footnotes:  <i>108 Stockport Employment Land Availability Study April 2010</i>  <b>1089</b> Greater Manchester Employment Land Position Statement, Nathaniel Lichfield and Partners, August 2009  <i>110 Future Stockport - Creating a Vibrant Town Centre Office Market, DTZ, 2009.</i></p>
FPMC/035b	Paragraph 3.229	<p><del>3.229 The provision of employment land in the borough forms part of a greater portfolio for the sub-region which tries to ensure there is sufficient employment land to meet the needs of developers and try to achieve the employment land figure set out in RSS Policy W3. Work commissioned to look at that figure<sup>(1089)</sup> found that overall the ten authorities were likely to under-supply employment land in relation to that policy. However it also concluded that the total supply figure was outdated for a number of reasons. As a result of that work and an assessment of future job numbers and types Stockport's town centre approach is focused towards floorspace rather than land provision.</del></p>
Issue (C)15		
FPMC/036	Paragraph 3.258	Monitor losses of employment units, <i>floor area and land area</i> to non-employment uses.
Issue (C)17		
FPMC/037	Development Management Policy AED5	<i>Where appropriate, viable and feasible, D</i> developers of new employment uses will be required to provide training or funding to provide education and training, in order to



Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
	(note this change supersedes FPMC/008 above)	help local residents develop the necessary skills to access the jobs being created in the borough. In addition, where appropriate end users will be require to recruit a certain percentage of the workforce from particular geographical areas, focusing on Neighbourhood Renewal Priority Areas.
FPMC/038	New paragraph after 3.255	<i>The Council will prepare an SPD setting out in more detail how this is to be achieved.</i>
Issue (B)6		
FPMC/039	Paragraph 3.102	...if necessary to provide the required level and right mix of housing. <i>It should be noted that new development could include measures that are demonstrated to improve accessibility to an appropriate degree and could then be considered acceptable.</i>
Issue (B1)11		
FPMC/040	Paragraph 3.129	...In areas with above average property prices and a particular lack of social rented housing, the affordable housing tenure split <i>sought</i> will be 50% intermediate housing and 50% social rented housing.
Issue (D)19		
FPMC/041	Paragraph 3.157, point 1	...The Core Retail Area of the Town Centre ( <i>as shown as the Central Shopping Area on the Proposals Map</i> ) is sequentially preferable for the purpose...
Issue (D)20		
FPMC/042	Glossary	Additional term: <i>Net floorspace</i> Explanation: <i>Net retail sales area as defined in Planning for Town Centres: Practice guidance on need, impact and the sequential approach (guidance on PPS4).</i>
Issue (D)22		
FPMC/043	Paragraph 3.197	...local impact assessment threshold will not apply to the Secondary Retail Area ( <i>as shown as the Great Portwood Street Area on the UDP Review Proposals Map or as revised through the Allocations DPD</i> ) of Stockport Town Centre.
Issue (D)23		
FPMC/044	Paragraph 3.207	The scale, catchment area, operational and market requirements of proposed hotel outside the Town Centre will be key considerations in assessing the <i>relevance of the PPS4 sequential tests and the</i> impact of such proposals on securing a range of Town Centre hotels.
Council's FPMC in response to Inspector's Question		

Ref#	Paragraph / figure / policy / number etc.	Changed wording ( <i>green italics to indicate new text, red struck through to indicate deleted text</i> )
FPMC/045	New paragraph following paragraph 3.92 (reasoned justification for Core Policy CS 2)	<p><i>“According to the latest assessment carried out in 2010 there is less than a five year deliverable supply of land for housing in Stockport. In order to top up the supply, planning applications for housing will be considered more favourably through the measures set out in Policy H – 2 Housing Phasing (paragraph 3.115).”</i></p>

## Appendix C



### **Core Strategy Examination in Public. Cala Homes Appeal, Core Strategy Implications.**

#### ***Council Response***

The Council agrees with the Inspector's summation that the presence of the Regional Strategy does not make a material difference to the Core Strategy policies or evidence base.

The Council concurs with the Inspector's reasoning that the approach taken in the Core Strategy is to continue with housing levels similar to those set out in the Regional Strategy and that this is justified by freestanding evidence. Furthermore, the Council agrees that other development levels (such as commercial and retail development) set out in the proposed Core Strategy policies are justified by specific, local evidence.

We have given some consideration as to how the Council's proposed changes to the publication Core Strategy that relate to the revocation of RSS (as set out in the Schedule of Minor Changes to the Publication DPD) should be dealt with. Generally speaking it is considered that, rather than withdrawing those changes, it would be preferential to leave them in place in the Schedule. We would then request that, in the Inspector's report, endorsement of those changes is withheld pending eventual enactment of the revocation. It is considered that to implement those changes any sooner would be premature whilst RSS has not been revoked.

The Council would consider it of great assistance if, in his report, the Inspector were able to state that:

*The presence (or otherwise) of RSS in fact makes no material difference to the Core Strategy and, therefore, that if the withheld changes were not to be implemented in the future (following eventual RSS revocation) it could not be considered that the Core Strategy is out-of-date.*

The proposed changes to which this relates are:

PMC/001	PMC/020	PMC/038	PMC/052
PMC/002	PMC/025	PMC/041	PMC/053
PMC/005	PMC/026	PMC/042	PMC/054
PMC/006	PMC/033	PMC/047	PMC/056
PMC/010	PMC/034	PMC/048	PMC/057
PMC/011	PMC/035	PMC/049	
PMC/013	PMC/036	PMC/051	

In addition the following changes were proposed partially because of RSS revocation. The Council would like to propose that these changes be dealt with as follows:

PMC/012      The first part of the proposed change (in the 3<sup>rd</sup> sentence of paragraph 3.80) be withheld. The second part of the change (in the 5<sup>th</sup> sentence of paragraph 3.80, which seeks to update the statistic of how many households are on the waiting list for social housing from the 2009 figure of 8,559 to the 2010 figure of 7,626) should still be implemented.

- PMC/014 The agreed AGMA position in relation to Gypsy and Traveler Accommodation Assessment (referenced jointly with RSS revocation as the reason for this proposed change) has superseded RSS in any case. Therefore it is considered that this change should still be implemented.
- PMC/015 The amendments to the end of the second sentence and the beginning of the 3<sup>rd</sup> sentence, along with the additional end sentence of paragraph 3.86 were proposed to provide clarity and consistency with Policy H-2 Housing Phasing. It is considered that these parts of the proposed minor change should, therefore, still be implemented. However, the proposed change to the start of the 4<sup>th</sup> sentence (replacing the words "*The regional*" with the words "*A secondary local*") were proposed because of the revocation of RSS and, therefore, should be withheld until RSS is lawfully revoked.
- PMC/019 Whilst RSS revocation was cited as part of the reason for this change it only actually related to the proposed amendments to the final footnote of the table. The Council considers that, whilst this change does remove the reference to RSS, it has further benefit in that it provides greater clarity in relation to the housing target, i.e. the total number of additional dwellings (7,200) divided by the number of years (15) – an annual target of 480 dwellings – rather than the straight forward RSS target of 450 dwellings per annum. Given that the RSS target is a minimum the change to show a slightly higher figure is, in any case, still within that which RSS allows/requires.

Richard Wood  
Planning Policy Manager  
16<sup>th</sup> November 2010

