Manchester City Council
Report for Resolution

Report to: Economy Scrutiny Committee – 9 January 2019
Executive – 16 January 2019

Subject: Residential Growth Strategy: Action Plan Update

Report of: The Strategic Director, (Development)

Summary

In March 2016 the Executive endorsed the Manchester Residential Growth Strategy; which set out the key priorities for delivering residential growth over the period 2015 – 2025. It included a target of 25,000 homes. The report was accompanied by an Action Plan which set out the key actions to be delivered during the first year of the Strategy (2016/17).

In June 2017 the Executive received and approved a Residential Growth Update report that included a 5 Year Action Plan covering the period 2017 – 2022 which identified key priority areas and key actions to be progressed.

In December 2018, Economy Scrutiny Committee and the Executive received a report from the Executive Member for Housing and Regeneration which set out a number of policy proposals in relation to the delivery of the City Council’s Affordable Housing Strategy. This included a revised Residential Growth Strategy target of 32,000 homes (including 6,400 affordable homes).

This report provides a summary update of the progress made in implementation the activities set out in the Residential Action Plan over the period 2016 to date. It provides a forward look to the challenges and external factors that pose a risk to the Council’s ability to deliver against its residential growth ambitions, whilst also summarising the current and emerging workstreams and opportunities to contribute to the delivery of the Residential Growth Strategy.

A further report will be brought to the Scrutiny Committee and Executive later this year, post-Brexit, providing an updated Action Plan that will ensure that the city delivers the aligned objectives of sustained economic and residential growth including the provision of affordable housing.

Recommendations

Economy Scrutiny Committee is invited to comment on the report and endorse the recommendations to the Executive as detailed below.

The Executive is recommended to:

1. Note the contents of this report concerning updates on progress made since 2016 and future actions;
2. Endorse the revised Residential Growth Strategy target of 32,000 homes (including 6,400 affordable homes); and

3. Note that a more detailed and updated Action Plan will be brought back to the Scrutiny Committee and Executive later this year, once the impact of Brexit is more clearly understood and a Draft Plan for Delivering Manchester's Affordability Strategy is in place.

Wards Affected: All

<table>
<thead>
<tr>
<th>Manchester Strategy outcomes</th>
<th>Summary of the contribution to the strategy</th>
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<tbody>
<tr>
<td>A thriving and sustainable city: supporting a diverse and distinctive economy that creates</td>
<td>Delivery of the Residential Growth Strategy will ensure that the right mix of new housing is delivered in the areas that can accommodate growth and that new homes are connected to new and existing employment opportunities.</td>
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<tr>
<td>jobs and opportunities</td>
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<tr>
<td>A highly skilled city: world class and home grown talent sustaining the city’s economic success</td>
<td>Ensuring the right mix of housing is essential to the retention and attraction of a highly skilled and economically active population.</td>
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<tr>
<td>A progressive and equitable city: making a positive contribution by unlocking the potential of</td>
<td>The Action Plan sets out the steps required to deliver the objectives of the Manchester Residential Growth Strategy and meet the growing demand for high quality new housing in the city, which meets the needs of existing and future residents.</td>
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<tr>
<td>our communities</td>
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<tr>
<td>A liveable and low carbon city: a destination of choice to live, visit, work</td>
<td>The residential growth development opportunities will support the delivery of sustainable neighbourhoods with excellent pedestrian and transport connections including the use of low carbon construction methods and technologies.</td>
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<tr>
<td>A connected city: world class infrastructure and connectivity to drive growth</td>
<td>The master-planning of new neighbourhoods and residential developments will include infrastructure and traffic and transport planning ensuring that various modes of transport (car, bus, rail, Metrolink, cycle, and walk) are provided for.</td>
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Full details are in the body of the report, along with any implications for

- Equal Opportunities Policy
- Risk Management
- Legal Considerations
Financial Consequences – Revenue

The current revenue budget to support residential growth initiatives was previously approved for the period 2016-2019. This budget has been used, and continues to be used, to commission consultancy support; master planning activities; marketing; legal fees; and other costs associated with bringing forward residential development. A future report to the Executive will set out proposals for revenue support for the period ahead.

Financial Consequences – Capital

There are no direct capital financial implications arising from this report but as specific schemes or proposals are brought forward any financial implications for the city will be reported for approval either to the Executive and/or the appropriate Capital Approval process.

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

- Delivering Manchester’s Affordable Housing Strategy – proposed new affordable housing policies for the Council, Executive 12 December 2018
- Delivering Manchester’s Affordable Housing Strategy – update on the delivery of the Council’s Affordable Housing Strategy, Economy Scrutiny Committee, 5 December 2018
- Housing Affordability Plan New Products, Executive, 7 March 2018
- Housing Affordability Plan, Executive, 18 October 2017
- Delivering Residential Growth: Update and Action Plan 2017-2022, Executive, 28 June 2017
- The Northern Gateway – Driving Forward Residential Growth, Executive, 8 March 2017
- Capital Programme (Budget 2017/18 – 2021/22), Executive, 11 January 2017
- Housing Affordability in Manchester, Executive, 14 December 2016
- Housing Affordability in Manchester, Executive, 1 June 2016
- Draft Residential Growth Strategy, Executive, 4 November 2015
- A Stimulus for Residential Growth, Executive, 24 June 2014
1.0 Introduction

1.1 In March 2016 the Executive endorsed the Manchester Residential Growth Strategy which set a minimum target of 25,000 new homes to be delivered within the city by March 2025. The Residential Growth Strategy proposed a set of priorities to support the city’s sustained economic growth and ensure that there are affordably priced houses and apartments for sale and rent, which would underpin the economic growth objectives of the city and meet the needs of all households who want to live in Manchester. The Strategy was accompanied by a One Year Action Plan to drive forward an initial set of activities.

1.2 In June 2017 the Executive received and approved a Residential Growth Update report that included a 5 Year Action Plan covering the period 2017 – 2022 which identified key priority areas for housing growth and a longer-term set of key actions to be progressed to establish appropriate planning frameworks that would stimulate housing growth and place-making; identify delivery partners and where required, establish appropriate delivery arrangements.

1.3 It should be noted that the Residential Growth Strategy, and its underlying objectives, are consistent with the ambitions set out within the draft Greater Manchester Spatial Framework (GMSF). In particular, the Council is seeking to increase supply and density at the conurbation core on brownfield sites on the northern and eastern edges of the City Centre (areas that are referred to as the Northern and Eastern Gateways) and in the emerging neighbourhoods on the southern fringes of the city centre, including Great Jackson Street and First Street. These are the key areas in which capacity exists for the thousands of new homes that the city and the wider GM area will require over the next few years. This will help reduce the need for green field and greenbelt land to be released across the wider conurbation.

1.4 It should also be noted that in December 2016, the Executive approved a new Housing Affordability Policy Framework for Manchester. The Framework set out an aim to increase the proportion of homes affordable to Manchester residents based upon the then average Manchester gross household annual income of £27,000. The Council subsequently agreed at its Executive in May 2018 that no Manchester resident should have to spend more than 30% of their household income on accommodation - and ideally less. Subsequent to this, in December 2018 the Executive Member for Housing and Regeneration submitted a report to the Executive which set out a number of new policy proposals relating to the delivery of Affordable Housing in the City, which will be the subject of a more detailed report on financial and legal consequences early in 2019. The Executive Member’s report set a revised Residential Growth Strategy target of 32,000 homes (including 6,400 affordable homes).

2.0 Progress Made in Delivering Residential Growth Since 2016

2.1 The Residential Growth Strategy and underpinning Action Plans have set out an approach that can be summarised as follows: -
• The establishment of collaborative arrangements with Homes England (The Homes and Communities Agency as was), the national government agency with a remit to accelerate the delivery of new housing, to ensure that strategic decisions in relation to funding, utilisation of land assets, and staff resources were aligned to promote and support the delivery of residential growth in Manchester. This collaboration, known as Manchester Place, has been successful in identifying and bringing forward new investment into the city and in helping to assemble land that provides new platforms for development on the northern, eastern and southern edges of the city centre;

• The establishment of planning policies, guidance (such as the Residential Quality Guidance), Strategic Regeneration Frameworks (SRFs) and Neighbourhood Development Frameworks (NDFs) that encourage and co-ordinate residential and mixed-use development in key locations in the City Centre and the adjoining neighbourhoods on the northern, eastern and southern edges of the City Centre that both support the delivery of housing growth and the Council’s ambitions in relation to place-making and sustainability.

• The identification and appointment of Joint Venture partnership arrangements with delivery partners with the financial wherewithal to deliver at the scale and pace required to both create places and deliver housing numbers – e.g. the Manchester Life Joint Venture with Abu Dhabi United Group on the eastern edge of the City Centre (the Eastern Gateway) and the emerging Joint Venture arrangements with Far East Consortium in the neighbourhoods of New Cross, Lower Irk Valley and Collyhurst (the Northern Gateway) have the combined potential to deliver in excess of 20,000 new homes over a 15 – 20 year period. Working at a smaller scale, the Council has also piloted work with the Greater Manchester Pension Fund (GMPF) to establish Matrix Homes to deliver an initial 240 homes for market rent and sale. This pilot has provided useful learning, with a further 340 homes currently planned and the potential for a regular development programme in the future being explored (see below). The Council will work closely with our JV partners and with others to ensure that 20% affordable housing is delivered within the Northern and Eastern Gateway areas and by Matrix Homes.

• Working in tandem with Private Finance Initiative (PFI) Consortia (both Registered Housing Providers (RPs) and private developers) undertaking estate remodelling and new house building programmes in Grove Village, Miles Platting and Brunswick and working in conjunction with the Guinness Partnership and Keepmoat Homes to deliver the comprehensive transformation of the West Gorton estate.

• Working with a range of private developers across the city where the Council has utilised its land assets to help unlock specific development opportunities – it is often the case that the City Council is able to utilise small pieces of land in its ownership to unlock larger sites and lever better
quality outcomes in scheme delivery.

- Delivering new Council housing directly (with 60 homes currently on site) or working in conjunction with RP partners to deliver Affordable Housing as part of larger schemes or as stand-alone opportunities through the use of land, brokering conversations with developer partners or encouraging and facilitating bids for Affordable Housing Programme resources.

- The identification of 4 Housing Affordability Zones to deliver 2,000 affordable homes.

- The creation of a Housing Affordability Fund including developer (Section 106) contributions, Right to Buy receipts and other monies.

- Providing Housing Options for Older and Vulnerable Residents – including the delivery of new retirement housing and Extra Care accommodation.

2.2 The table below sets out the number of residential completions that have been recorded in the city in the first three years of the strategy (2015/16 to 2017/18) and projected completions for 2018/19.

<table>
<thead>
<tr>
<th>Financial Year</th>
<th>Total Number of Residential Completions</th>
<th>Cumulative Number of Completions since April 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015/16</td>
<td>1,531</td>
<td>1,531</td>
</tr>
<tr>
<td>2016/17</td>
<td>1,735</td>
<td>3,266</td>
</tr>
<tr>
<td>2017/18</td>
<td>2,887</td>
<td>6,153</td>
</tr>
<tr>
<td>2018/19 (Projections)</td>
<td>3,627</td>
<td>9,780</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>9,780</td>
</tr>
</tbody>
</table>

2.3 Many of these completed new homes are apartments in and around the City Centre. This is generally the type of accommodation desirable to graduates and skilled professionals working in the city. Evidence gleaned through discussions with large employers looking to bring new jobs to Manchester suggests that the city’s strong residential supply pipeline, which helps to retain and attract talent, is a key determining factor in them choosing to bring jobs to Manchester over other cities.

2.4 The combination of the attraction and retention of talent, for which the Universities play a key role, together with a strong long-term residential supply pipeline and a continued investment in job creation in the city, in key growth areas, is fundamental to the city’s continued economic growth and success.

3.0 Residential Growth Action Plan – Forward Look

3.1 The above table shows completions from April 2015 to March 2018 of c.6,000. Based upon completions since then and schemes currently on site and in the
planning pipeline we anticipate that a further c.14,000 new homes will be delivered over the next three years, i.e. c. 20,000 in total by March 2021. If we use a forecast of 3,000 new homes per annum being achieved over the remaining period covered by the current Residential Growth Strategy, this will result in a total of 32,000 new homes being delivered against the target of 25,000 homes originally set.

3.2 On the face of it, these forecasts paint a positive picture but there are a number of critical issues that the Strategy needs to take account of: -

**Brexit**

3.3 It is perhaps unsurprising that the continuing uncertainty around Brexit is beginning to impact on the property market. The Royal Institution of Chartered Surveyors (RICS) has reported a significant weakening of the housing market with indicators of supply, demand and prices falling to multi-year lows in November.

3.4 The RICS findings echo figures from Britain’s biggest mortgage lender, Halifax, which showed house prices growing at an annual rate of 0.3% in November, the slowest since December 2012. The average asking price of a UK home has fallen by 3.2% between October and December 2018 according to Rightmove, who have reported that they expect zero growth in in UK house prices in 2019.

3.5 Even if the danger of a no-deal Brexit is averted, economists are predicting higher borrowing costs as the Bank of England are likely to raise interest rates.

3.6 A number of commentators are pointing out the risk that this weakening position could prompt a downturn in housebuilding; which, if true, will obviously impact on the Manchester market and the projections set out above.

**Delivering an Appropriate Mix of Property Types and Tenures**

3.7 The City emerged from the global recession of the 2000’s in a relatively strong position and is well placed to continue its long-term trajectory of sustained economic growth. Over the period 2016 – 2024 it is anticipated that an additional 50,000 jobs will be created in the city and that the population will have increased to over 600,000, with more than 90,000 people living in the City Centre.

3.8 To be successful, the city will need to provide a housing offer that continues to grow to accommodate this economic growth as well as meeting the needs of existing residents. It also needs to grow in a manner that deepens and broadens the tax base of the city, as we are unlikely to see a return to a situation where Government provides the level of revenue grant support to underpin Local Authority service provision as existed in the past.
3.9 As highlighted in previous reports, Manchester has a disproportionately high number of properties in the lowest Council tax bands (75% in bands A and B) and only 4% of properties in band E+. This makes the challenges of closing the gap presented by the reduction of the Government revenue grant even more pronounced, especially in comparison to some of the more traditionally affluent parts of the country where the housing market is much more balanced. Opportunities will continue to be explored to enable the delivery of products at the upper end of the housing market, including executive homes in higher tax bands, to attract and retain residents at this end of the market.

3.10 At the same time, as the report submitted by the Executive Member for Housing to the Economy Scrutiny Committee and Executive in December highlighted, there has been a growing issue of affordability for Manchester residents in recent years that is likely to persist into the foreseeable future. Changes to the administration of Local Housing Allowance (LHA) and the adverse impact of the Government’s Welfare Reform programme has increased pressures on the social rented sector, and the Housing Register has grown to 13,000 people and families, of which 5,000 are classified as in need (bands 1-3 of 6).

3.11 On this basis, the projects and initiatives within the Residential Growth Strategy need to be reviewed to ensure that the nature and form of new housing provision takes account of this situation – delivering a balanced range of housing types and tenures that operate at all price points and meets the needs of Manchester and its residents in the short, medium and long term.

Land Supply and Availability of Public Sector Funding

3.12 As Members will only be too aware, the availability of public sector funding has been dramatically curtailed as a result of successive Governments’ implementing a policy of austerity since 2010. However, in recent times there have been a number of positive announcements, such as:

- the Autumn 2017 and 2018 budget statements have released up to £5.5 billion of resources through the Housing Infrastructure Fund (HIF), providing funding for new infrastructure that will unlock the development of up to 650,000 homes nationally;

- the Autumn 2017 budget statement also increased the Affordable Homes Programme by £2bn to £9.1 billion, meaning that there is more funding to invest in affordable housing than there has been for many years; and,

- in October 2018 the Government announced that they were lifting the borrowing cap on the Housing Revenue Account (HRA), allowing Councils to borrow more, subject to affordability, to invest in new affordable Council housebuilding.

3.13 It should be noted that there are strings attached to all of these announcements. For example, the Government has provided guidance that makes plain that 80% of the HIF resources will be targeted at areas with the
greatest “affordability” pressures; effectively meaning that 80% of the national programme will be targeted at areas predominantly in the south of the country. Even more perversely, the Government are using land value uplift as the primary mechanism to assess the Benefit to Cost Ratio and Value for Money of bids submitted; without including an assessment of the number of housing units that could be unlocked as a result of the investment being made. This would result in a proposal that unlocks agricultural land for residential use scoring better than a brownfield scheme delivering housing close to an urban centre, even if the number of homes that were ultimately delivered in the latter was considerably higher.

3.14 The Residential Growth Strategy is contingent, in part, on our ability to unlock and re-purpose large tracts of under-utilised and brownfield land to the north and south of the City Centre which suffer from infrastructure deficits (e.g. power, drainage, access) and from the legacy of previous industrial uses (e.g. contamination). Successfully accessing HIF resources will be important in delivering development in these locations.

3.15 Concerns have already been expressed with this approach to Homes England at a senior level. It will also be important that the Council collaborates with other Core Cities to set out Manchester’s housing delivery offer and what might be more appropriate metrics to use to evaluate the benefits of HIF investment in the local context.

3.16 Likewise, lifting the HRA borrowing cap is helpful, but there will still be a legal requirement to operate a balanced HRA account over a 30 year period; and HRA borrowings will also be assessed within the context of the Council’s current overall debt cap, which will be in place until at least March 2020.

Draft Greater Manchester Spatial Framework and Manchester Local Plan

3.17 As noted above, the Residential Growth Strategy is fully in line with the Draft Greater Manchester Spatial Framework (GMSF), a revised version of which is expected to be subject to public consultation during the early part of 2019.

3.18 Allied to this, the adoption of a new Manchester Local Plan (the production of which is planned to commence in Summer 2019), would create the opportunity to review and more closely align housing and planning policies for the first time since the current Local Plan was adopted in 2012.

4.0 Forward Actions

4.1 Appendix 1 attached provides more details on the progress of key activities underway together with actions that will be taken forward during 2019. However, the key Forward Actions can be summarised as follows:

4.2 Collaborative Working – Homes England and Government

4.2.1 Homes England recently launched their 5 year Strategic Plan, the highlights of which are listed below:
Aiming to invest over £27bn over the next few years across a range of programmes.
Aiming to double their current workforce of 750 full time employees over the next 18 months.
Target for England to be delivering 300,000 new homes each year.
Increase productivity in the construction sector.
Increase the proportion of small and medium sized enterprises active in the housing sector.
Reverse the trend in owner occupation which has fallen from a peak of 71% in 2003 to 63% today.
Promote Modern Methods of Construction (including modular homes).

4.2.2 Homes England’s Strategic Plan provides greater clarity on the role that Homes England will play in facilitating the delivery of new housing nationwide. As the administrator of such a significant package of public sector funding programmes there is an opportunity to seek synergies between the Council’s own residential growth programmes and Homes England’s strategic objectives.

4.2.3 As explained above, the recent introduction of new geographical targeting rules affecting the distribution of funding flowing from Government serves to restrict the amount of funding available to areas outside of the South and South East of the country. However, the Council will continue to forge strong relationships with Homes England and continue to make the case for investment into Manchester to sustain and accelerate residential growth that benefits the local, regional and national economies.

4.2.4 In addition to Homes England the Council will seek to continue to maximise investment into residential development in the city through its work with the GMCA, existing and future joint venture partners and local and national Registered Providers.

4.3 Driving Forward Joint Venture Partnerships

4.3.1 In early 2019 the Council’s Executive will receive a final version of the Strategic Regeneration Framework for the Northern Gateway and, subject to approval, this document will act as a material planning consideration and provide a point of co-ordination for development activity undertaken via the Joint Venture partnership and other developers. Initial planning applications will follow behind to initiate the first phases of housing development. This will be supported with a bid for the Government’s Housing Infrastructure Fund that will be submitted in March 2019.

4.3.2 The Manchester Life Joint Venture will continue to deliver new homes in Ancoats and New Islington during 2019 – with approximately 1,500 units already completed or on site. Master-planning for additional opportunities will also be undertaken.

4.3.3 The next phase of the Matrix Homes partnership with the Greater Manchester
Pension Fund (GMPF) – which has identified sites with capacity for 340 homes will be taken forward and further opportunities for investment by the GMPF will be explored.

4.4 Delivering Manchester’s Affordability Strategy

4.4.1 Work will be undertaken to translate the policy proposals set out in the Executive Member for Housing and Regeneration’s into a programme of action – including the identification of sites and delivery arrangements for new Council House building. This will augment the delivery of 840 affordable homes currently on-site that are being brought forward by Registered Provider Partners and the City Council (The City Council element being 40 new council houses on site in North Manchester).

4.5 Taking Forward Plans for the Four Housing Affordability Zones

4.5.1 The Executive meeting of October 2017 agreed to establish 4 Housing Affordability Zones which have the potential to bring forward a significant number of affordable Homes. These being:

- North Manchester (including Collyhurst and Central Estates)
- Clayton (including land at Eccleshall Street and Ilk/Alpine Streets)
- Beswick (including land at Grey Mare Lane)
- Wythenshawe Town Centre

4.5.2 During 2019 proposals for delivery will be brought forward for these Zones.

4.6 Modern Methods of Construction – Modular Build

4.6.1 Modular building – or off-site construction of housing, where a significant element of a home is built in a factory, has the potential to speed up housing delivery and deliver higher quality homes. Both of these factors can be beneficial to developers and also those delivering affordable housing. However off-site housing tends to be more expensive than traditional build techniques at present, which inevitably reduces the take up. The Government is keen to see off-site housing expanded to address the skills and materials shortages that become more prevalent as the supply of homes increases. As a result, additional grants can be secured through Homes England for off-site built affordable housing. The Council for its part will be exploring how best to capitalise on the increasingly important potential of off-site housing. Further ideas will be shared later in 2019. In the meantime it is proposed that the next phase of North Manchester New Build homes will be delivered as an off-site housing pilot scheme.

4.7 Achieving Zero Carbon

4.7.1 In November 2018, the Council committed to achieving Zero Carbon by 2038. Existing and new housing can play an important role in delivering this commitment. An Action Plan will be developed later in 2019 to identify how the Council can support developers of market sale/rent and those delivering
affordable housing to work towards this goal. In the meantime the potential for the next phase of the North Manchester New Build programme to achieve above Building Regulations energy performance will be explored.

4.8 **Community Led Housing**

4.8.1 The Council has committed to establish a strategy for community led housing by the summer of 2019. As part of this strategy the Council will explore the feasibility of at least 3 community-led housing projects on Council land providing at least 30 affordable homes in total. At least one of these will be led by older people.

5.0 **Conclusion**

5.1 This report has provided an overview of the significant progress that has been made to date in delivering against the objectives of the Residential Growth Strategy that was established in 2015/16.

5.2 The report sets out emerging challenges that the future implementation of the Strategy will need to take account of in the form of: more difficult market conditions as a result of the continued uncertainty surrounding Brexit; that the speed of delivery of large initiatives such as Northern Gateway will in part be contingent upon increased access to public investment programmes that will be required to unlock challenging sites where large numbers of new houses can be built; and the requirement to refresh the approach to delivery of affordable housing.

5.3 It is therefore proposed that an updated Residential Growth Action Plan is brought back to a future meeting of the Scrutiny Committee once there is greater clarity surrounding Brexit and the economic and property market impacts can be adequately assessed; once the funding bid for the Northern Gateway programme has been submitted to Government; and the policy proposals relating to the delivery of Affordable Housing set out by the Executive Member for Housing and Regeneration have been translated into a Draft Delivery Strategy.

5.4 It is anticipated that this Action Plan will be ready for consideration in the late spring of 2019.

6.0 **Contributing to the Manchester Strategy**

(a) **A thriving and sustainable city**

6.1 Delivery of the Residential Growth Strategy will ensure that the right mix of new housing is delivered in the areas that can accommodate growth and that new homes are connected to new and existing employment opportunities.

(b) **A highly skilled city**

6.2 Ensuring the right mix of housing is essential to the retention and attraction of
a highly skilled and economically active population.

(c) A progressive and equitable city

6.3 The objectives of the Manchester Residential Growth Strategy and meet the growing demand for high quality new housing in the city, which meets the needs of existing and future residents.

(d) A liveable and low carbon city

6.4 The residential growth development opportunities will support the delivery of sustainable neighbourhoods with excellent pedestrian and transport connections including the use of low carbon construction methods and technologies.

(e) A connected city

6.5 The master-planning of new neighbourhoods and residential developments will include infrastructure and traffic and transport planning ensuring that various modes of transport (car, bus, rail, Metrolink, cycle, and walk) are provided for.

7.0 Key Policies and Considerations

(a) Equal Opportunities

7.1 The Action Plan will support the delivery of residential-led development providing a significant number of high quality homes alongside commercial development. This will both meet increasing levels of demand for housing within the city and create new employment opportunities.

(b) Risk Management

7.2 The risks associated with residential development projects will be managed by the Residential Growth Team. Risks will be escalated and decisions made in accordance with the Council’s governance arrangements.

(c) Legal Considerations

7.3 The spatial priorities and subsequent residential developments will be progressed through all relevant stages with the support of legal expertise.