Places for Everyone - Duty to Co-operate Statement and Log of Collaboration August 2021

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# 1 Places for Everyone Duty to Co-Operate Statement

## **Places For Everyone Duty to Co-operate Statement**

- 1.1 This document is a Duty to Co-operate Statement and is required to support the preparation of Places for Everyone Publication Plan (August 2021). It complements the Statement of Common Ground providing the detail of the log of activities and collaboration since 2013 with neighbouring local authorities, public bodies and sets out the dates of important governance meetings progressing the PfE. It should be read alongside the PfE Statement of Common Ground setting out the current collaborative position with Duty to Co-operate bodies and the PfE Statements for each issue.
- 1.2 The 'Duty to Co-operate' became a legal requirement under the provisions of the Localism Act, which came into force in November 2011. Section 33A of the Planning and Compulsory Purchase Act 2004, inserted a new legal requirement referred to as the 'Duty to Co-operate'. The National Planning Policy Framework (NPPF) February 2019 refers to the Duty to Cooperate. It states that local planning authorities and are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 1.3 The duty as set out in Section 110 of the Localism Act:
  - relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council
  - requires that councils set out planning policies to address such issues
  - requires that councils and public bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies
  - requires councils to consider joint approaches to plan making.

# 2 Who needs to co-operate?

## **Strategic Policy Making Authorities**

2.1 The Places for Everyone Plan Publication is a Joint Development Plan Document and as such the nine authorities are the "strategic policy making authorities" and have established a Joint Committee of the Nine. This Committee considers all substantial decision making matters relating to the preparation of Places for Everyone Plan. The

main signatories will be the nine members of the Joint Committee. Previous iterations of the plan were approved through the AGMA Committee which had delegated authority to prepare a joint plan for the ten GM districts.

- **2.2** Membership of the Joint Committee of the Nine includes:
  - Bolton Council
  - Bury Council
  - Manchester City Council
  - Oldham Council
  - Rochdale Borough Council
  - Salford City Council
  - Tameside Metropolitan Borough Council
  - Trafford Council
  - Wigan Council
- 2.3 Previously Stockport MBC was part of the jointly prepared development plan document, known as Greater Manchester Spatial Framework (GMSF) but at its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish GMSF 2020 for consultation. As the GMSF 2020 was a joint development plan document of the 10 Greater Manchester authorities it required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10 and consequently the anticipated Regulation 19 stage did not take place in December 2020. Stockport MBC are now considered an additional signatory to the PfE plan.
- Whilst some local planning authorities such as Cheshire West and Chester are not a neighbouring authority with a contiguous border with the PfE plan authorities, we do recognise that there are some issues that have a wider strategic impact such as minerals and waste and have decided to deal with these as part of the Statement of Common Ground.

# **Duty to Co-operate Bodies**

- 2.5 Duty to Co-operate bodies are made up of neighbouring authorities and public bodies. The nine members of the Joint Committee must cooperate with the GM Local Enterprise Partnership and GM Local Nature Partnership (Natural Capital Group) and have regard to their activities but these groups are not subject to the requirements of duty to cooperate.
- **2.6** The Duty to Co-operate bodies are listed below:

# The Mayor of Greater Manchester and Neighbouring Authorities

The Mayor of Greater Manchester

- Blackburn with Darwen Borough Council
- Calderdale Council
- Cheshire East Council
- Chorley Borough Council
- Derbyshire County Council
- High Peak Borough Council
- Kirklees Council
- Lancashire County Council
- Liverpool City Region
- Peak District National Park
- Rossendale Borough Council
- St. Helen's Council
- Stockport Metropolitan Borough Council
- Warrington Council
- West Lancashire Borough Council
- West Yorkshire Combined Authority

#### **Public Bodies**

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups
- National Health Service Commissioning Board
- The Office of Rail Regulation
- Transport for Greater Manchester
- Highways Authorities
- Highways England
- Local Enterprise Partnership
- Local Nature Partnership

# 3 Geographical Area

# **Geographical Area**

3.1 The area covered by the Places for Everyone Publication Plan and Statement of Common Ground is shown in the diagram below. The early stages of evidence gathering established that Greater Manchester was the correct boundary to consider housing and travel to work areas. Detailed work on what should be the Functional Economic Area was undertaken in 2014 as part of the Objectively Assessed Needs Consultation.

The withdrawal of Stockport MBC from the joint development plan process does not negate that they are part of the Greater Manchester housing market area or travel to work area.



3.2 Effective co-operation on cross boundary strategic issues covers those areas outside of Greater Manchester but sharing a border, plus Stockport MBC. Co-operation takes place with the relevant level of local government depending on the issue, this includes city-region, county and local. Public bodies also take an interest in cross boundary matters for example the Environment Agency and flooding.

#### 4 Collaboration

- 4.1 From the early evidence gathering stages the GMCA has been cooperating with neighbouring authorities and sharing information on stages, evidence and policy. This has enabled our Duty to Co-operate partners to share any cross boundary concerns with us and these have covered:
  - Spatial Strategy
  - Transport
  - Housing
  - Employment
  - The environment
  - Green Belt

- Community benefit and
- Allocations.
- 4.2 The Duty to Co-operate Statement is a record of the collaboration and collaborative activity with neighbouring authorities and has informed the development of policy and effective consideration of cross border issues.
- 4.3 As part of the PfE preparation key pieces of evidence have been shared with neighbouring authorities outside of PfE and key bodies active in GM. The GMCA Boards and Commissions have considered much of the evidence supporting PfE.
- 4.4 A considerable amount of evidence is shared at each iteration of the plan and can be found here: <a href="Home-Greater Manchester Combined Authority">Home-Greater Manchester Combined Authority</a> (greatermanchester-ca.gov.uk)

## **Housing and Employment**

- 4.5 The approach to housing and employment has been to meet all needs within the travel to work and housing market area which was identified as Greater Manchester. This need was collectively identified and then distributed in line with the Spatial Strategy. No district in GM identified any unmet need to be distributed. Once Stockport departed from the joint process this approach has remained for the PfE districts and Stockport is managing its own approach to housing and employment.
- As the plan progressed it became clear that the level of growth planned to 2037 in both housing and employment could not be accommodated within the urban area. This was despite achieving high densities, a call for sites exercise, identifying new brownfield sites, examining the future contribution of town centres, it still did not identify enough land within urban areas and Green Belt needed to be considered. Once this was established our neighbouring authorities, constituting our duty to co-operate bodies were asked at various stagesvof the plan whether they could accommodate any housing or employment growth. To date this has not resulted in any of our neighbouring authorities accommodating any of our need, due to existing Green Belt in other authorities which would need to be removed to accommodate PfE growth or the stage of the authorities Plan.

# **Transport**

4.7 Concern was expressed from the early stages of the plan preparation about the impact of increased commuting on already constrained transport links into Greater Manchester. Our neighbouring authorities from, Blackburn with Darwen, Cheshire East, High Peak, Derbyshire CC, Rossendale, Lancashire CC all raise concerns about the impact of growth in PfE on cross boundary routes, both road and public transport. Highways England expressed very serious concern at one point regarding the lack of evidence

to consider the impact on the SRN. Since that time considerable further work has been undertaken related to transport impact examining the existing land supply, allocations and the cumulative impact of both.

#### **Green Belt**

4.8 The Stage 1 Green Belt Methodology was shared with neighbouring authorities in the early stages of plan preparation and where appropriate comments incorporated. A Greater Manchester Green Belt Stage 2 assessed the potential impact on the Green Belt from releasing land for the proposed allocation. Comments from Duty to Co-operate bodies have been considered in the development of the approach to this policy area and a policy relating to safeguarded land included and additional evidence prepared to take into account the departure of Stockport from the joint plan making process.

## **Flooding**

4.9 The approach to flooding has been informed by a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) and a Strategic Flood Risk Management Framework (SFRMF) prepared. The Environment Agency have been involved throughout the preparation of this work alongside GM districts and the GMCA. To help complete the GM level 1 and Level 2 Strategic Flood Risk Assessments, the GMCA engaged the Environment Agency for advice on a regular basis between 2018 and 2021. As such, the Environment Agency were members of the Steering Group for the GM level 1 and Level 2 Strategic Flood Risk Assessments and weekly 'keep in touch' meetings were held. The EA also provided technical flood risk advice for the GM Level 2 Strategic Flood Risk Assessment on some proposed allocations over 2019 and 2020.

# Heritage

- 4.10 Following concerns expressed by Historic England regarding the approach to the historic environment throughout the PfE and the gaps in evidence, the GMCA undertook further work and shared this with Historic England. This consisted of a Historic Environment Background Paper, Archaeological and Built Heritage Assessment and Screening and Site Heritage Assessments. Detailed heritage issues in the existing urban area will be dealt with by district local plans.
- 4.11 The approach to the historic environment has been updated in response to issues and collaborative activity. The policy has been revised in relation to additional evidence prepared in the Historic Environment Background Paper. It is judged that this substantial part of the evidence base responds to concerns outlined by Historic England and helps to underpin the policies and allocations throughout the plan.

#### **Natural Environment**

4.12 Natural England made a number of comments centred around green infrastructure, related to definitions, biodiversity new gain, cross boundary landscapes and functioning nature recovery networks. They also raised concerns about the approach to the Habitat Regulation Assessment. Since that point, considerable further work has been prepared to address these points and Natural England have been involved with the development of the evidence base and consulted on the approach to developing a Habitat Regulation Assessment that accords with the regulations.

#### Stockport

- 4.13 The departure of Stockport from the joint planning process led to a reset of the Duty to Co-operate relationship which previously sat under the GMCA/AGMA Joint Board. Stockport are no longer part of the approach to housing and employment which under pins the PfE and is set out in more detail in this statement. They are preparing their own plan and their own approach to meeting their housing and employment needs.
- 4.14 The agreed approach between the PfE districts to distribute housing and employment need to meet the spatial strategy focusing growth in the core, boosting competitiveness in the north and sustaining southern competitiveness remains for the PfE districts but Stockport must decide its own approach and distribution of housing and employment.
- 4.15 Meeting and communication at both officer and Member level between PfE representatives and Stockport has been quickly established and both parties are keen to collaborate moving forward. The details of this collaboration are set out in more detail in the Statement of Common Ground.
- 4.16 Moving forward the PfE timetable and the Stockport Local Plan timetable will inform the approach to Duty to Co-operate. It must be noted that the PfE timetable is considerably advanced to the Stockport Local Plan, which has identified a timetable with an expected Draft Plan Autumn 2021, Publication Spring 2022, Submission Autumn 2022 and Adoption 2023. The PfE timetable is Publication commencing 20<sup>th</sup> July, Submission January 2022 and Adoption 2023.
- 4.17 The districts are seeking to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.

# **Duty to Co-operate Activity**

**4.18** At each stage collaboration with Duty to Co-operate bodies has taken place and this is summarised in the Log of Collaboration attached to this report. It covers:

- Formative Proposals for a Greater Manchester Spatial Framework (March 2013 to November 2014)
- Vision, Objectives and Strategic Growth Options for the Greater Manchester Spatial Framework (December 2014 to January 2016)
- First draft of the Greater Manchester Spatial Framework (February 2016 to January 2017)
- Greater Manchester's Plan for Homes, Jobs and the Environment Revised Draft of the Greater Manchester Spatial Framework (February 2017 to March 2019)
- Places for Everyone Publication Publication Plan (April 2019 to Summer 2021)
- **4.19** A summary of activity is provided in the following sections.

# 5 Formative Proposals for a Greater Manchester Spatial Framework

- The formative proposals for the GMSF were determined during this stage and the following key activities took place:
  - Initial Consultation on the Objectively Assessed Development Needs was undertaken ending on 7th November 2014;
  - AGMA Executive agreed to prepare a statutory joint development plan document for Greater Manchester 29<sup>th</sup> August 2014, and;
  - Each of the ten GM Authorities delegated authority to AGMA to prepare the GMSF through the Joint AGMA Committee (this subsequently became the Joint GMCA/AGMA Committee).
  - GMCA/AGMA Executive Board Approved the consultation and technical reports for a public consultation to be undertaken over a six week period. Agreed the recommendation to prepare a statutory joint Development Plan Document through the AGMA Committee 14<sup>th</sup> November 2014.
- 5.2 A list of all the relevant decisions, by each local authority delegating authority to AGMA to prepare a joint development plan document is set out below.

District	Full Council Approval
Bury	28/01/15
Bolton	25/02/15
Manchester	01/04/15
Oldham	04/02/15
Rochdale	21/01/15
Salford	21/01/15
Stockport	02/04/15
Tameside	24/02/15
Trafford	25/03/15
Wigan	14/01/15

District Approval to Delegate Authority to AGMA Executive to Prepare a Joint Plan

- 5.3 Collaboration with neighbouring authorities began prior to the decision to prepare a statutory joint plan. In March 2013 a letter was sent to neighbouring authorities explaining the intention to prepare a position statement setting out the level of growth proposed across Greater Manchester to 2032. The intention being the level of growth would be set out in the Greater Manchester districts strategies and policies.
- This initial communication was followed by a series of meetings with Blackburn with Darwen, Chorley, West Lancashire, Liverpool, Warrington, High Peak, Rossendale, Kirklees and Calderdale. The meetings discussed development plan updates, SHMA and housing market areas, cross boundary transport issues and also agreed to share the GM Logistics Brief with Liverpool.
- The Objectively Assessed Development Needs consultation ran from September to November 2014. Comments were received from the following Duty to Co-operate bodies:
  - Blackburn with Darwen
  - Cheshire East
  - Environment Agency
  - High Peak
  - Lancashire County Council
  - Natural England
  - Transport for Greater Manchester
  - Warrington Borough Council
- A key comment made by the Environment Agency stated the GMSF Vision should be the same as the Greater Manchester Strategy and this was incorporated into the plan and agreed by the ten Leaders and The Mayor. Warrington raised the issue of logistics within the Atlantic Gateway covering the area along the M62 through to Port Liverpool. High Peak raised concerns about the impact of growth on commuting patterns and transport routes from High Peak to Greater Manchester. Lancashire County Council raised concern about the possible impact of growth on flood risk. Natural England referred to a project identifying ecosystem services and pinch points across GM which should be considered in the plan.
- 5.7 GMCA Governance engaged the following duty to co-operate bodies: all ten GM districts, Homes and Communities Agency, Environment Agency and Transport for Greater Manchester.

# 6 Vision, Strategy and Strategic Growth Options - December 2014 to January 2016

6.1 This stage was approved by Joint GMCA/AGMA Executive Board on 30 October 2015.

- GMCA governance engaged the following bodies: all ten Greater Manchester districts, Homes and Communities Agency, Environment Agency, Natural England, Transport For Greater Manchester and the Local Enterprise Partnership and the Natural Capital Group. Feedback from these meetings informed the development of the Draft GMSF 2016.
- 6.3 In 2015 the Cheshire East Local Plan was reaching the final stages of its preparation and preparing further evidence to support the examination in public. During this time GMCA raised concerns about the impact of growth in the North of Cheshire area on the transport infrastructure within Greater Manchester particularly the A34. Cheshire East suggested updating the SEMMMS scheme.
- The GMCA held a series of meeting with its neighbouring authorities providing an update on GMSF and presenting evidence and commuting patterns between Greater Manchester and the neighbouring local authority. Chorley Council and Rossendale Borough Council confirmed they could not accept any additional housing to meet Greater Manchester's Objectively Assessed Need.
- Issues raised at the Vision, Strategy and Strategic Growth Options consultation stage, which took place between 9th November 2015 and 11 January 2016, included:
  - Natural England and Historic England sought greater emphasis on the natural environment and historic environment;
  - Chorley sought further clarification on gypsy and traveller provision within Greater Manchester;
  - Rossendale expressed concern that the distribution of growth may place greater pressure on Rossendale to accommodate additional development;
  - Blackburn with Darwen expressed concern that Greater Manchester's growth could impact on their own aspirational housing agenda;
  - Kirklees expressed concern that transpennine transport issues generated by the scale of growth in Greater Manchester had not been fully assessed.

# 7 Draft of the Greater Manchester Spatial Framework - February 2016 to January 2017

7.1 This stage was approved by Joint GMCA/AGMA Executive Board on 28 October 2016. GMCA governance engaged the following bodies: all ten GM districts, Homes and Communities Agency, Environment Agency, Natural England, Transport for Greater Manchester, GM Local Enterprise Partnership and GM Natural Capital Group (Local Nature Partnership). Feedback from these meetings informed the development of the GMSF.

- 7.2 During this period a number of neighbouring districts confirmed they could not accept additional housing to meet Greater Manchester's Objectively Assessed need. These included Calderdale, Kirklees, Warrington and High Peak. West Lancashire are awaiting further evidence including the Greater Manchester Green Belt Review before deciding whether they can accommodate any of Greater Manchester's housing requirement.
- **7.3** Cheshire East sought stronger wording on transport and linkages and specifically in relation to Transport 2040 and the SEMMMs refresh.
- **7.4** Warrington stated the need to ensure GMCA/Liverpool City Region do not double count the need for logistics generated by Liverpool 2, Port Salford etc.
- 7.5 Rossendale referred to the M66/A56 study and stated that the M66 corridor is critical for Rossendale as housing and employment sites are located along the A56 corridor with M66 acting as the gateway. They also raised the issue of the "Northern Gateway" and its potential to attract commuters from Rossendale. They are concerned that this growth may have an impact on Rossendale's infrastructure.
- **7.6** Blackburn with Darwen are seeking support for a joint approach with Greater Manchester to establish commuting assumptions to feed into housing requirements modelling work.
- 7.7 Additional issues raised at the formal consultation stage are set out in Section 13 in the Log of Collaboration.

# 8 Greater Manchester's Plan for Homes, Jobs and the Environment: Revised Draft of the Greater Manchester Spatial Framework -February 2017 to March 2019

- 8.1 This stage was approved by Joint GMCA/AGMA Executive on 11th January 2019. GMCA Governance engaged the following bodies, Homes and Communities Agency, Environment Agency, Natural England, Transport for Greater Manchester, GM Local Enterprise Partnership and GM Natural Capital Group (Local Nature Partnership). GMCA Governance and boards progressed work on responses to the first draft of the GMSF, developing environmental targets for the GMSF, the approach to concept planning, integrated water management, a wide range of infrastructure issues and the GM 2040 Transport Strategy Delivery Plan 2020-25.
- 8.2 Neighbouring authorities have been asked at each stage if they would be willing to accommodate any housing and employment provision. This has allowed the full consideration of all the options available, and to date there has been no confirmed commitment to accommodate any of our provision. This fits with GMSF's ambition to accommodate all needs within the GMSF borders. Currently there are no unmet needs in Greater Manchester for either housing or employment. This information has been used to inform GMCA's approach to Green Belt release and establish exceptional circumstances for its release.

- 8.3 Joint meetings were undertaken between each district and the Environment Agency, Natural England and United Utilities between 2017 and early 2018 on the emerging evidence base and concept planning for each allocation. The objective being to discuss key environmental issues and opportunities as well as infrastructure requirements. In undertaking early pro-active engagement outside of the statutory plan consultation this has ensured best practice is applied in taking statutory consultee/infrastructure advice as part of the plan making process and to refine emerging options.
- 8.4 During this period meetings between St. Helens, Warrington, Wigan and GMCA focused on the proposed M6 Junction 23 Feasibility Study funded by Liverpool City Region Single Investment Fund. The study is examining the need for improvements to this junction as a result of increased freight traffic from employment sites Liverpool 2/ Superport and Knowlsey Industrial Park and also sites in Wigan. In July 2017 Wigan agreed to fund 5% of the study.
- 8.5 Rossendale raised concerns about the Northern Gateway and its potential to attract commuters from Rossendale. They emphasise the importance of improving the A56/M66 corridor and having an integrated approach to transport planning around the Northern Gateway.
- Calls for a refresh of the SEMMMS by Stockport and Cheshire East led to the commencement of this study in 2017. The completed document sets out priorities for transport investment across south east Manchester until 2040. It covers schemes such as the M6 to M60 relief road, the A34 strategic corridor and the A6 corridor. The commencement of the SEMMMs refresh was raised by Cheshire East, High Peak and the Peak District National Park and they have been closely involved in the refresh.
- 8.7 Additional issues raised at the formal consultation stage are set out in Section 14 in the Log of Collaboration.

#### **Statement of Common Ground Event January 2019**

- A Statement of Common Ground Event was held on the 30th January 2019, an opportunity for GM districts, neighbouring local authorities, public bodies and infrastructure providers to come together and find out about the revised draft GMSF 2019. It was an opportunity to have an open discussion about clarifying or raising concerns about the revised draft GMSF. The event was organized into two halves, with the morning providing an update and covering the approach to the GMSF, followed by meetings in the afternoon with individual authorities, if required. Two separate meetings were held following the main event and this was with Rossendale Borough Council and Warrington Council.
- 8.9 The Statement of Common Ground Event was held in the early part of the consultation period of the revised draft GMSF 2019 to ensure our "Duty to Co-operate" requirements were given priority and our Duty to Co-operate partners were given the fullest opportunity to engage with GMCA during this consultation stage.

#### **Revised Draft GMSF 2019**

- 8.10 The following shows how the Revised Draft GMSF 2019 has been amended to take on board the comments by key public bodies, where possible. At this stage Transport evidence gathering was ongoing.
- 8.11 The structure of the Revised Draft GMSF 2019 was changed from the 2016 Draft Plan and placed a greater emphasis in setting the scene and explaining the context. This helped create deeper explanations relating to policy areas and this has also been complemented with more detailed evidence.
- 8.12 The Revised Draft GMSF 2019 included a chapter called A Sustainable and Resilient Greater Manchester and this provided more depth on many of the policy areas of concern, particularly those expressed by the Environment Agency. It included new and revised policies relating to Sustainable Development, Meeting Our Carbon Commitments, Heat Energy Networks, Resilience, Flood Risk and Water Environment and Clean Air.
- 8.13 The Revised Draft GMSF 2019 included a chapter called A Greater Manchester For Everyone and covering policies on: Promoting Inclusion; Sustainable Places; Heritage, Retail and Leisure; Health; and Sports and Recreation. These policies seeks to recognize some of the concerns expressed by the Salford Clinical Commissioning Group. The Heritage, Retail and Leisure policy have been informed by the comments made by Historic England and provides a strategic framework for the approach to heritage in Greater Manchester and the role of the GMSF and Local Plans.
- 8.14 The Revised Draft GMSF 2019 included a new chapter called A Green Greater Manchester and a policy on The Greater Manchester Green Belt. This policy has been informed by a Green Belt Assessment, proposed additions and site selection process which has informed the proposed Green Belt boundary. This chapter also includes new and revised policies on Valuing Important Landscapes, Greater Manchester's Green Infrastructure Network, Biodiversity and Geodiversity. Many of the policies were further strengthened by evidence, the objective to deliver a net gain in natural environmental assets and an integrated approach to green infrastructure networks and new development. A Landscape Character and Sensitivity Assessment was prepared for Greater Manchester which provides a consistent evidence base, assessing the quality and sensitivity of different landscapes and considering cross-boundary relationships. These policy amendments were informed by the comments made by Natural England, West Lancashire, Rossendale, High Peak, Peak District National Park, the Natural Capital Group and Salford Clinical Commissioning Group.
- 8.15 The approach to transport was set out in a new chapter called A Connected Greater Manchester, this included new policies covering World Class Connectivity, Digital Connectivity, Walking & Cycling Network, Public Transport, Transport Requirements of New Development, Highway Infrastructure Improvements, Freight and Logistics and Streets for All. In addition to the improvements listed in these policies, improvements

- to the network are set out in the 2040 Transport Strategy Delivery Plan 2020-2025 published alongside the Revised Draft GMSF 2019. The information in these policies and the transport evidence was of direct interest to our neighbouring authorities who have raised concerns about the impact of growth in Greater Manchester on the wider transport network outside of GM. Further transport modelling work was underway to complement this evidence but was not available for the Revised draft of the GMSF.
- 8.16 The approach to sites was informed by a GMSF Site Selection methodology to identify the sustainable locations for residential and employment development that can achieve the objectives of the GMSF Spatial Strategy and meet the housing and employment land supply shortfall across GM. The Revised Draft GMSF 2019 identified the opportunities and broad areas where it is considered development will achieve the levels of new growth required to meet the needs of Greater Manchester. The site selection process seeks to achieve this by focusing firstly on the urban area followed by safeguarded land and then Green Belt.

# 9 Greater Manchester's Plan for Homes, Jobs and the Environment: Publication Draft Greater Manchester Spatial Framework - April 2019 to December 2020

- 9.1 Greater Manchester's Plan for Homes, Jobs and the Environment: Publication draft Greater Manchester Spatial Framework was approved by Joint GMCA/AGMA Executive on 30th October 2020. The decision is shown below.
- 9.2 After approval at the AGMA Executive Board each of the 10 GM Council's considered the Publication GMSF and all but one approved the GMSF for Publication and Submission. At the Stockport MBC Council meeting 17th November a report was taken seeking approval of the Publication and Submission GMSF and the majority of Committee Members voted against these recommendations. At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.
- 9.3 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.
- 9.4 Despite Stockport's decision to leave the joint plan making process considerable duty to co-operate activity had taken place since the end of the Revised Draft GMSF consultation and the work undertaken to December 2020 is set out below.

#### **Duty to Co-operate Bodies Comments to Revised Draft GMSF**

9.5 Since the consultation period ended on the Revised Draft GMSF 2019 considerable work has taken place to support the plan with further studies and Duty to Co-operate activity. Detailed in the Log of Collaboration: Publication Draft Greater Manchester

Spatial Framework - April 2019 to December 2020 are the comments made by Duty to Co-operate bodies to the Revised Draft GMSF which have informed the consideration of revisions to policy and evidence. Also set out in the Log of Collaboration are the responses from neighbouring districts to requests in Spring 2020 to accommodate some of PfE's housing and employment need.

#### **Environment Agency**

- 9.6 The Environment Agency raised concerns about the need for flood risk evidence to support the PfE plan. They supported the preparation of the Level 1 SFRA that identified the strategic allocations and sites within the existing land supply requiring the application of the Exception Test. They stated the Level 2 SFRA was required to show that exception tests can be applied appropriately and to justify the quantum of development. They also stated Level 1 SRFA identified gaps in understanding of future climate change impacts and this additional work should form part of the Level 2 SFRA work.
- 9.7 The Level 2 SFRA covered Exception Test Reports, Flood Risk Reviews, Flow Models, Opportunity Areas for Safeguarding Land for Flood Risk Management, and a methodology to update locally defined Critical Drainage Areas. The Environment Agency have been involved throughout the preparation of this work alongside GM districts and the GMCA.
- To help complete the GM level 1 and Level 2 Strategic Flood Risk Assessments, the GMCA engaged the Environment Agency for advice on a regular basis between 2018 and 2021. As such, the Environment Agency were members of the Steering Group for the GM level 1 and Level 2 Strategic Flood Risk Assessments and weekly 'keep in touch' meetings were held. The EA also provided technical flood risk advice for the GM Level 2 Strategic Flood Risk Assessment on some proposed allocations over 2019 and 2020 including Chew Brook Vale in Oldham, East of Boothstown in Salford and Elton Reservoir in Bury. The GMCA and EA continue to have weekly catch-up meetings to discuss water related planning matters

#### **Historic Environment**

- 9.9 Historic England raised concerns that the Revised Draft GMSF 2019 did not show an appreciation of the area's heritage and this should run continuously throughout the GMSF. They made comments throughout the plan that the GMSF fails to recognise the conservation or enhancement of the historic environment adequately or as a strategic priority. They stated a reason this may be lacking is due to gaps in the evidence base underpinning the plan.
- **9.10** Further evidence prepared includes:
  - Historic Environment Background Paper
  - Archaeological and Built Heritage Assessment and Screening Exercise
  - Site Level Heritage Assessments

9.11 In 2020 a meeting took place between Historic England and the GMCA to discuss the Statement of Common Ground, GMSF, High Street HAZ, Oldham Mills Strategy and GM Textile Mills Strategy. It was agreed to set up an additional Statement of Common meetings and for the GMCA to share the Historic Environment topic paper, revised policy wording for Crimble Mill, Unity Mill and Land South of Hyde. Historic England agreed to share the draft Oldham Mills Strategy when available.

#### **Highways England**

- 9.12 At the 2019 Revised Draft GMSF stage Highways England made a number of detailed comments relating to policies and allocations which may impact on the Strategic Road Network (SRN). One of the key comments was insufficient transport evidence had been provided at this stage and this meant Highways England were unable to assess the impact of the Plan on the SRN (and adjacent local highway links) at an individual site allocations level, or on a cumulative basis. The lack of detailed evidence meant the form, scale and location of the investment needed on the SRN in Greater Manchester as a direct consequence of the growth outlined in the Plan could not be identified.
- 9.13 Since these comments have been made, significant and substantial transport evidence has been prepared to answer the question of the impact of proposed growth set out in the Publication Draft GMSF on the SRN. This evidence includes:
  - GMSF: Existing Land Supply and Transport Technical Note;
  - GMSF: Transport Locality Assessments (TLAs) for the Allocations;
  - GMSF Plan Allocations Strategic Modelling Technical Note (SMTN).
- 9.14 Much of this has been shared with Highways England throughout its preparation including the locality assessments examining the potential impact of an allocation on the SRN. Further impact assessments on the SRN are underway in conjunction with Highways England. This is investigating the cumulative PfE impacts on the SRN mainline links and is expected to deliver key findings in Summer 2021.
- 9.15 Considerable work took place between the Revised Draft GMSF and the Publication Draft GMSF with regular Greater Manchester Highways Strategy Board meetings quarterly and a Highways England TfGM Strategic Working Group Meeting meeting approximately every 6 weeks. The working group has had GMSF/PfE as a standing item on the agenda since 2017 and updates are reported every quarter to the Greater Manchester Highways Strategy Board.

#### **Natural England & Habitat Regulation Assessment**

9.16 A meeting took place in March 2020 to discuss GMEU's/GMCA's proposed resolutions to overcome Natural England's objection to the Habitat Regulation Assessment (HRA) on the GMSF 2019 to inform the HRA of the GMSF 2020. Subject to the relevant mitigation and evidence being clearly expressed/referred to, Natural England were agreeable to GMEU/GMCA's proposed approach to resolve the GMSF's potential impact on designated European sites relating to air quality, recreation, cumulative

impact, the Rochdale Canal SAC, functionally linked sites and water pollution. Nevertheless, Natural England stated that the Appropriate Assessment of the HRA of the GMSF 2020 will need to fully articulate any impacts the GMSF might have and fully articulate the proposed mitigation to address the impacts.

#### **Duty to Co-operate Transport Meetings**

- 9.17 In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA and neighbouring authorities with the focus being the transport evidence. The Agenda for each meeting was broadly the same but considered specific neighbouring authorities duty to co-operate comments. It covered the work done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. It also included a GMSF timeline and GMSF Overview.
- **9.18** Attendees at the meeting included:
  - Blackburn with Darwen Borough Council
  - Calderdale Council
  - Cheshire East Council
  - Chorley Borough Council
  - Derbyshire County Council
  - High Peak Borough Council
  - Kirklees Council
  - Lancashire County Council
  - Liverpool City Region
  - Peak District National Park
  - Rossendale Borough Council
  - St. Helen's Council
  - Warrington Council
  - West Lancashire Borough Council and
  - West Yorkshire Combined Authority.
- 9.19 It provided an opportunity to explain the approach to the transport evidence and how the various elements provided a comprehensive approach to understanding impact and managing growth on the transport network. At this point Stockport MBC was one of the strategic plan making authorities and attended the relevant meetings. Following each meeting a Proforma of the meeting minutes and outcomes was shared with attendees and this is set out in Section 15 of the Log of Collaboration.

#### **Peak District National Park**

9.20 The Peak District National Park has raised concerns about the Chew Brook Vale allocation over various iterations of the joint plan largely related to the impact of this proposed development on the Peak District National Park. The PDNP are supportive of the redevelopment of the former Fletcher Mill but has concerns about the wider

- development area within the Revised GMSF 2019, including inclusion of Green Belt within the boundary, enabling development, the HRA requirement for further detailed assessment to determine if the site is functionally linked to the South Pennines SPA and expansion of the holiday lodges by 10-15 units.
- 9.21 Oldham Council and Peak District National Park met to discuss the comments made to the Revised GMSF 2019 in May 2020. They discussed the need for an exemplary landscape setting to reduce impact on the National Park, altering the boundary, HRA and specific policy wording.
- 9.22 The allocation has been amended to ensure development is in accordance with a masterplan and design code. The boundary has been reduced to exclude the Green Belt area. The number of homes planned has been reduced to 90 units. Reference has been inserted to state development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995. It must have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt. Reference to the proposed increased number of holiday lodges has been removed.

# 10 Publication Places for Everyone (January 2021 to Summer 2021)

#### Places for Everyone: Publication Draft - January 2021 to Summer 2021

- 10.1 Following the departure of Stockport from the joint plan making process a Joint Committee of the Nine was established to continue to progress the PfE plan. As this is substantially the same as the proposed publication GMSF plan it can move to Publication as the PfE. The new Joint Committee approved the PfE 2021 on 20th July 2021. Consultation begins 9th August and will run for 8 weeks.
- 10.2 The Table below shows the approval route for the Publication PfE and the various committee meetings from the Joint Committee to district committees.

District	Council	Exec/Cabinet
Joint Committee		20th July 2021
Bolton	28th July 2021	26th July 2021
Bury	28th July 2021	21st July 2021
Manchester	6th October 2021	28th July 2021
Oldham	21st July 2021	28th July 2021
Rochdale	28th July 2021	27th July 2021
Salford	21st July 2021	21st July 2021

Tameside	28th July 2021	28th July 2021
Wigan	21st July 2021	20th July 2021

Table 10.1 Places for Everyone Publication Approval Process

10.3 Detailed in the Log of Collaboration are the continued collaborative activity undertaken since January 2021 to prepare the PfE. Also set out are the responses from neighbouring districts to requests to accommodate some of PfE's housing and employment need sent to districts in May 2021. Responses so far are that neighbouring districts are unable to meet any of PfE's housing or employment need.

#### **Historic England**

- 10.4 Regular meetings have taken place to discuss the content of the draft PfE. In March 2021 a formal meeting to clarify the position following the regular catch-up's took place and discussed the details of the approach to the historic environment in the PfE. This included the changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment. The main areas discussed were Vision and lack of emphasis of the built/historic environment in the plan. It was explained, there are difficulties around changing the vision as it has been agreed by districts and the Mayor to use the Greater Manchester Strategy vision.
- Also discussed were site allocation policies Historic England requested to see the HIA/HEA work specifically referenced consistently through the site allocation policies where this was relevant. It was agreed that this would be considered, either within policy or as a footnote, but also important to make clear that further work would be required, the HIA is a starting point. It is considered the PfE has made relevant amendments to address this.
- 10.6 An outcome of the meeting was Historic England agreed to send a table of proposed changes, ranked in order of importance in terms of soundness/risk to historic environment.
- 10.7 The approach to the historic environment has been updated in response to these issues and the collaborative activity. The policy has been revised in relation to additional evidence prepared in the Historic Environment Background Paper. It is judged that this substantial part of the evidence base responds to concerns outlined by Historic England and helps to underpin the policies and allocations throughout the plan. With regard to changes to Policy JP-P 2 Heritage, the policy has been amended and an additional paragraph inserted to state proposals should be informed by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process. Discussions will continue with Historic England as the Places for Everyone Plan progresses.

#### **Natural England**

- Natural England submitted a comprehensive response to the Revised GMSF 2019. They sought to work with the GMCA to strengthen the plan to deliver stronger protection for the natural environment. They emphasised the opportunities presented by the Draft GMSF to deliver natural capital net gains in the areas of wetland habitat and enable a functioning nature recovery network.
- 10.9 Key comments related to strengthening the approach to natural capital in the plan especially in reference to Green Infrastructure; providing an improved definition of Green Infrastructure. They suggested amendments to the following policies and stated the policy A Net Enhancement of Biodiversity and Geodiversity should refer to biodiversity net gain rather than enhancement of biodiversity net gain, which is not in accordance with Defra's definition, this point was also made by the Environment Agency and Greater Manchester Natural Capital Group (Local Nature Partnership).
- 10.10 In response to Natural England's comments, the GMCA and PfE districts have continued to work with Natural England on the development of the evidence base and policy development, as listed below:
  - Landscape Character and Sensitivity Assessment
  - Greater Manchester's Tree and Woodland Strategy
  - Greater Manchester Accessible Natural Greenspace Analysis
  - Greater Manchester Biodiversity Net Gain
  - Soil Resources
- 10.11 Changes to the Greener Places chapter have taken on board many of Natural England's comments. It has strengthened the references to the approach to natural capital. The definition of Green Infrastructure has been improved in policy JP-G 2 Green Infrastructure Network. The role of different types of green infrastructure to Nature Recovery Network have been added and recognised in the Plan. Amendments have been made to various policies to reflect updated evidence and also respond to NE comments. Policy JP-G 2 Green Infrastructure Network has been improved to pick up references to green infrastructure in new development and also where new provision is made as part of a development the developer should make appropriate provision for its long term management and maintenance. The policy a Net Enhancement of Biodiversity and Geodiversity now includes reference to achieving biodiversity net gain.
- 10.12 NE made comments that some sections of undeveloped mossland are considered inappropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth. Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.

#### **Habitat Regulation Assessment**

- 10.13 Since the 2019 Revised GMSF Draft the GMCA have engaged Natural England in the preparation of the Habitats Regulations Assessment (HRA). The HRA must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the internationally important interest features of a European site. To date, the GMCA has held five meetings with Natural England to progress the HRA: one informal meeting in 2019, two formal meetings through Natural England's Discretionary Advisory Service in 2020, a meeting in Spring 2021 and a further meeting in July 2021.
- 10.14 A meeting took place in April 2021 between the GMCA, TfGM, GMEU and Natural England to discuss air quality issues relating to the HRA of the Places for Everyone plan. The outcome of the meeting was that the GMCA and TfGM would commission an air quality assessment as part of the HRA to fully assess air quality impacts.
- 10.15 A meeting took place in July 2021 between the GMCA TfGM, GMEU, air quality specialists Ricardo and Natural England. The purpose of the meeting was to discuss the screening results of the HRA Phase 1 Air Quality Assessment. The outcome of the meeting and next steps were:
  - It is recommended that an Appropriate Assessment should be undertaken to identify whether the identified impacts from the PfE Plan could affect the integrity of these sites, alone or in combination with other plans and projects.
  - Discussions between the GMCA and Natural England have demonstrated that an
    effective partnership can be developed in order to identify any potentially significant
    impacts, and to put appropriate mitigation in place, if this should be needed.
  - The scope and approach of the Appropriate Assessment will be determined in consultation with Natural England. The approach is likely to include considerations such as: the distribution of sensitive qualifying features within the designated site and their predicted exposure to air pollution; the current status of the site, whether favourable or unfavourable; the conservation objectives for the site; and whether there are plans to increase or restore the distribution of sensitive qualifying features within the site.
  - For designated sites where the Appropriate Assessment indicates that there are adverse effects related to air pollution, mitigation measures will be investigated and recommended. Potential mitigation measures will be discussed with Natural England, and measures which meet the appropriate regulatory requirements for classification as mitigation measures will be recommended.
  - Limited potential for in-combination impacts has been identified in relation to proposed strategic highways development, and development plans being brought forward or implemented by neighbouring authorities. Where appropriate, the GMCA should work collaboratively with other local authorities and Highways England under the Duty to Cooperate to address such impacts.

#### **Highways England**

- 10.16 Following the departure of Stockport from the Joint plan further work has been commissioned removing the proposed Stockport allocations from the transport modelling. The previous studies have been update to ensure an accurate measure of impact of proposed growth set out in the PfE on the SRN. This evidence includes:
  - PfE: Existing Land Supply and Transport Technical Note;
  - PfE Transport Locality Assessments (TLAs) for the Allocations;
  - PfE Plan Allocations Strategic Modelling Technical Note (SMTN).
- 10.17 Highways England have confirmed in a letter dated 17th June 2021 and shown in the log of Collaboration, that the PfE sets out plans for new homes and employment floorspace over the plan period and this is an important opportunity for the nine Local Authorities to create the conditions for inclusive growth, to meet housing need and protect and enhance the natural environment with the support of the appropriate transport infrastructure. They support the Greater Manchester Transport Strategy 2040 and commit to playing their part in the delivery of the Five Year Delivery Plans. They recognise the progress being made to deliver the supporting transport infrastructure to deliver the development plans in the previous stages of the Plan. They confirm their commitment to ongoing collaboration with the GMCA, the nine Greater Manchester districts, Transport for Greater Manchester and partners to deliver the PfE. They will continue to do this through the existing Memorandum of Understanding that has been in place for the last five years with the TfGM.
- 10.18 In this it states "We believe that PfE, along with GM's proposals in the Clean Air Plan and for tackling climate change, together set a framework for sustainable growth across the region. As such, Highways England will continue to work alongside our strategic partners to better understand the implications of this growth and will continue to investigate how we can make best use of the SRN to support the economy, connect people and places, and improve our environment."
- **10.19** Highways England confirm they are working with TfGM and the GMCA to examine the potential impacts of the plan on the SRN.

#### Stockport MBC

- **10.20** In the light of the withdrawal of Stockport Council from GMSF, it has been necessary to 'reset' the Duty to Co-operate arrangements.
- **10.21** Since Stockport's Departure in December 2020 the following activities have taken place:
  - Meeting between PfE representative and Stockport MBS 11<sup>th</sup> February 2021 to discuss how to take forward Duty to Co-operate activities following Stockport's departure from the joint planning process

- Letter from Stockport to the PfE districts 3<sup>rd</sup> March 2021 asking for the PfE to continue accommodating some of Stockport's housing and employment provision including up to 30% of their housing provision.
- Response from PfE 19<sup>th</sup> April 2021 setting out how the position with regard to housing had changed with the requirement for Manchester to accommodate a 35% uplift to their LHN. Indicating further collaborative work around employment should be explored to gain an understanding of the current position.
- Meeting 26<sup>th</sup> May 2021 to discuss various Duty to Co-operate matters including the Stockport Local Plan and the development of further evidence to inform their approach to the spatial strategy of the plan.
- Letter dated 21st June 2021 from PfE representative to Stockport MBC recognising that employment housing evidence was still being gathered by Stockport Council and they were not in a position to identify their unmet need. It asked that once this was available it was shared with the PfE districts so they could consider whether it was possible to accommodate any potential shortfall.
- Meeting between Mayor of Greater Manchester Andy Burnham, City Mayor of Salford GMCA Portfolio Lead Paul Dennett and Leader of Stockport Council Cllr Elise Wilson 14<sup>th</sup> June discussing various cross boundary matters including continued collaboration over preparation of the PfE plan and Stockport Local Plan.
- A follow up letter dated 26th July 2021 to the meeting 14th June was sent to Stockport Council Leader Elise Wilson from The Mayor Andy Burnham and Paul Dennett Mayor of Salford setting out the outcome of the meeting with regard to the timetable of the PfE and Stockport Local Plan, the reset relationship between Stockport MBC and the nine PfE districts and the commitment to continued collaboration. It also included a statement setting out the position between the 10 Greater Manchester Authorities with regard to the PfE. This is set out below.

# **Co-operation Between the 10 Greater Manchester Authorities**

- 10.22 In November 2014 the 10 Greater Manchester authorities resolved to prepare a joint development plan document, known as the Greater Manchester Spatial Framework.
- 10.23 The 10 authorities agreed to discharge their duty to co-operate, pursuant to s33A of the Planning and Compulsory Purchase Act 2004 by agreeing to prepare a joint local development document covering housing and employment land requirements including, as appropriate, strategic site allocations and Green Belt boundary amendments and associated infrastructure.
- 10.24 The rationale for a joint plan was the opportunity to support the strategic objectives of Greater Manchester by providing certainty around scale and distribution of development and aligning this with strategic infrastructure plans.
- 10.25 A joint plan was considered essential to underpin the growth ambitions of the 10, as set out in the Greater Manchester Strategy and later in the Local Industrial Strategy.

- NPPF applies a presumption in favour of sustainable development (paragraph 11B), which requires strategic policies, as a minimum, to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (subject to the tests set out in that paragraph). The 10 authorities agreed that a key objective of the plan was to meet their own objectively assessed needs to ensure that ambitious proposals to boost economic performance across the conurbation was matched by a supply of housing of sufficient quality and diversity to meet the needs of all of residents.
- **10.27** The 10 authorities worked together to:
  - a. Agree the objectively assessed needs for housing and employment across the plan area
  - b. Identify the existing land supply available for development following an optimisation process
  - c. Agree that there was a shortfall in existing land supply to meet needs
  - d. Engage constructively with neighbouring authorities outside of GM to explore the opportunity for some of our need to be met elsewhere
  - e. Commission an extensive evidence base to underpin and inform the plan, including Transport, Landscape Character assessment, Green Belt Assessment and Green Belt Harm Assessment, SFRA, Viability, Carbon and energy, SHMA
  - f. Following this work it was agreed by the 10 that a limited release of Green Belt land was required to meet needs of the 10 authorities.

#### Addressing the Shortfall

- 10.28 The starting point for addressing the shortfall was the requirement to support delivery of GM's objectives. In spatial terms this translated into identification of sufficient land to support sustained, sustainable and inclusive growth to ensure that no part of GM was left behind and all residents had the opportunity to benefit in the economic success of the conurbation. The spatial strategy that was developed focused on making the best use of urban/brownfield land and existing transport infrastructure whilst identifying opportunities to spread prosperity to all parts of the city region. The spatial strategy for growth focused on the following:
  - i. Strong and continued growth at the conurbation core
  - ii. Focus on regeneration of the inner areas around the conurbation core
  - iii. Boosting the economic performance of the northern districts
  - iv. Sustaining southern competitiveness
  - v. Main Town Centres
  - vi. Rapid Transit routes
- 10.29 Over 1000 sites had been submitted through the Call for Sites process. Clearly not all of these sites were required to meet the shortfall therefore a site selection process was agreed (set out in detail in the Site Selection Background Paper GMSF 2020).

#### The Site Selection process

- **10.30** The 10 districts collaborated on a Green Belt Assessment. This did not identify any significant locations where the tests of Green Belt were not met.
- 10.31 In order to achieve the principles established by the spatial strategy, it was considered appropriate to establish a number of "rules" when applying the site selection criteria to housing sites. These rules were:
  - Each district was encouraged to meet their own local housing need (LHN)
  - Where a single district had sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt in that district
  - If a single district could not meet their own LHN through their existing land supply there was an expectation that they would need to supplement their land supply through allocations beyond the urban area, to enable them to meet a significant proportion of their own LHN, considered to be at least 70% of its LHN
  - No single district should exceed its LHN by more than 125%
  - Collectively the northern Greater Manchester districts should meet around 100% of their collective LHN, in order to ensure that the overall objective of inclusive growth and boosting the competitiveness of north Greater Manchester would succeed
  - The southern Greater Manchester districts should collectively meet a significant amount of their LHN, in order to achieve inclusive growth across Greater Manchester
- Site Selection criteria were developed, informed by NPPF and a number of areas of search were identified where it was considered that the site selection criteria had been met to act as a general guide. Buffers were placed around town centres and public transport hubs and consideration was given to sites (reasonable alternatives) within these locations to increase the supply of land for development. Every district had a number of 'reasonable alternatives' to consider.
- 10.33 In terms of employment land, identification of sites was informed primarily by the spatial strategy and the objectives to support strong and continued growth at the core (by focusing the majority of office/commercial development within the core growth areas of Manchester, Salford and Trafford), boost the economic competitiveness of the north (by identifying sites which are transformational in nature and provide for diverse employment opportunities which could not be delivered by the existing land supply) and sustain the competitiveness of the southern area (by taking advantage of global opportunities presented by the airport and the proposed HS2 route).
- 10.34 The outcome of this work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations proposed outside the urban area to bolster the existing land supply and to ensure that the overall Vision and Objectives of the Plan were met.

- 10.35 Housing and employment targets were agreed, accompanied by a land supply buffer to allow for flexibility and choice. The buffer reflected the outcomes of the strategic viability study which identified a significant challenge with the viability of housing land across all districts of Greater Manchester, but with a particular concentration in the northern districts.
- 10.36 Whilst the outcome of the spatial strategy was some individual districts not meeting their LHN and some exceeding theirs, the extent to which districts were meeting need was never a defining factor in determining distribution. No district was identified as having 'unmet' needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial strategy. The fact that Stockport were only meeting 70% of their LHN did not mean that Stockport had 30% unmet need. It was an outcome of the spatial strategy.

#### **DECEMBER 2020 TO PRESENT**

- 10.37 The Stockport Council decision to withdraw from the GMSF in December 2020 signalled the end of the joint plan of the 10, and changed the basis on which the 10 districts would co-operate on strategic planning matters in future.
- 10.38 The 9 remaining districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) decided to continue to collaborate on a joint plan. These districts agreed to establish a Joint Committee and they will continue to discharge their duty to co-operate, pursuant to s33A of the Planning and Compulsory Purchase Act 2004 by agreeing to prepare a joint local development document.
- **10.39** Stockport Council is committed to preparing its own local plan.
- 10.40 The Duty to Co-operate arrangements need to be reset and these are necessarily more complex now that Stockport is no longer participating in the joint plan.
- 10.41 Since December the 9 districts have been actively considering the impact of the recent changes to the LHN methodology (introduced in December 2020) which required Manchester City Council to accommodate a 35% uplift over its previous LHN. It is not clear the basis on which this uplift has been applied, it does not relate to population or economic forecasts for the MCC area, therefore this represents a 'redistribution of unmet needs' from elsewhere in the country. Aside from the difficulty of understanding who these homes may be for and what their requirements may be, the 35% uplift resulted in an additional 914 homes per annum, almost 15,000 over the plan period. The guidance also stated that this uplift had to be accommodated in the MCC area.
- 10.42 In March 2021, Stockport Council requested whether the nine districts were still willing to accommodate similar levels of Stockport Council's housing and employment need as in GMSF in PfE. As outlined in paragraph 15 above, the 30% of housing need which Stockport was not accommodating in GMSF 2020 was never identified as an 'unmet' need, it was the outcome of the agreed spatial strategy. Paragraph 11(b) of the NPPF applies a presumption in favour of sustainable development and requires strategic

policies to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, subject to the caveats set out in that paragraph. To the best of our knowledge, Stockport have not yet carried out an assessment of capacity to meet its own needs and have not indicated whether they have unmet need, and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs.

- 10.43 Since March there have been a number of meetings between officers and members representing the 9 districts and Stockport Council. Several issues were agreed to be needing further engagement and discussion:
  - Timescales for plan preparation of the PfE and the Stockport Local Plan
  - The extent to which Stockport Council supports the thematic policies in the plan, in particular Chapter 3, The Vision and Strategic Objectives and Chapter 4, Strategy (most notably) the section on 'southern competitiveness' within this Chapter;
  - Timescales to share the Vision, Strategic Objectives and spatial strategy of the Stockport Local Plan;
  - Proposed scale and distribution of development to deliver that strategy;
  - Approach to identifying land and an assessment of the extent to which Stockport can meet its own development needs
  - Identified shortfall (if any)
  - The extent to which Stockport Council supports the evidence base underpinning Places for Everyone and intends to utilise this as part of its own local plan.
- 10.44 The timetable for Places for Everyone, anticipates a consultation on a Regulation 19 plan anticipated in August 2021, Submission January 2022 and Examination and Adoption by 2023. Papers to begin the process are scheduled to be published on 12 July 2021. At this point in time, the 9 districts do not have an evidenced understanding of what the Stockport land supply position is, and the assumptions underpinning Stockpot's assessment of it.
- **10.45** Stockport is intending to consult on a Regulation 18 (Issues and Options) in Summer 2021.
- 10.46 In the light of this, the districts are seeking to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.

# 11 Formative proposals for a Greater Manchester Spatial Framework - March 2013 to November 2014

11.1 This section covers the initial policy proposals and meetings that formed the basis of the Greater Manchester Spatial Framework in 2013/14.

# 11.1 GMCA Governance: Greater Manchester City Region

Date	Governance	Minutes	Actions
29/08/14	GMCA/AGMA Executive Board	Agree the preparation of a statutory Development Plan Document (DPD).	Begin preparing the GMSF as a statutory DPD
22/09/14	Infrastructure Advisory Group	Infrastructure Master Plan and GMSF discussed as well as issues relating to Carrington. Update from each utility provider on known capacity issues relating to Carrington and MediPark given.	
24/10/14	Planning & Housing Commission	Presentation and briefing received on the GMSF.	To note the next steps for the GMSF would involve a consultation process
			Note the evidence base will be revised in light of consultation responses and Department for Communities and Local Government (DCLG) household projections
17/11/14	GMCA/AGMA Executive Board	A report set out the establishment of a joint agreement between the ten Greater Manchester councils to prepare the Greater Manchester Spatial Framework (GMSF) to cover housing and	Approve the consultation and technical reports for a public consultation to be undertaken over a six week period
		employment land requirements and associated infrastructure across Greater Manchester as a joint development plan document.	Delegate the formulating and preparing of the GMSF to the GMCA/AGMA Executive Board
		The preparation of the GMSF as a joint DPD, will need to be reflected in each district's Local	

Development Schemes (LDS). Further work is required to ensure that each individual district's Statement of Community Involvement (SCI) reference the joint DPD appropriately.	•	Agree the recommendation to prepare a statutory Development Plan Document (DPD)
	•	Approve the amendment to the AGMA constitution by deleting the words "initially in terms of Waste and Mineral Planning"

Table 11.1 Collaborative Activity with GMCA Governance

# 11.2 Neighbouring Authorities Bordering Greater Manchester City- Region

Neighbouring Authority	Date	Activity	Key Points
Letter to neighbouring local planning authorities from GMCA	28 March 2013	Letter	The letter informed neighbouring authorities that Greater Manchester commenced a project to establish a new and up to date position on future growth within Greater Manchester to support delivery of the Greater Manchester Strategy and provide a framework for districts to progress strategies and plans. The outcome of this work is an agreed GM position on the scale, type and location of growth for over the next 20 years (up to 2032).
Blackburn with Darwen	23/08/13	Meeting	Population projects forecast a declining population – trying to reverse this. Prioritising prestige employment sites near to the M65. Infrastructure aim to maximise connectivity through M65.
Chorley, West Lancs	08/10/13	Meeting	AGMA/GMCA provided an update on GMSF progress and discussed the preparation of the SHMA. GM to provide initial findings once further progress has been made. Any cross boundary housing market issues would be limited to the West Lancs / Wigan geography.
Liverpool	15/10/13	Meeting	Discussed viability of building at density and on previously developed land, maintaining a 5 year supply of sites that are deliverable, work is underway on updating SHMAs, issues with census data population

			and household forecasts, common issues relating to logistics and development Port of Liverpool, Manchester Ship Canal and Port Salford. GM agreed to share the GM logistics brief.
Warrington	25/10/13	Meeting	Update provided on the Warrington Core Strategy. Trafford have raised concerns relating to growth in Lymm. No plans to review Green Belt until 2032.  A transport issue identified was the bottle neck developing on the shortcut from the M62 to the M60 via Irlam and Cadishead.
High Peak	13/11/13	Meeting	AGMA/GMCA provide an update on GMSF progress and discussed the preparation of the SHMA. There is a need for good transport connections to Manchester supporting demand for parts of High Peak.
Rossendale	19/11/13	Meeting	Connectivity is a key issue as the borough is located between Yorkshire, East Lancashire and GM. Lancashire LEP is in place alongside work with Pennine Lancs through PLACE. Allocations Plan being produced and have received representations from Bury. Working with Burnley on green infrastructure. Agreed to send a GM representative to the SHMA event.
Kirklees and Calderdale	02/12/13	Meeting	Discussed the GM position on growth including infrastructure, transport investment and the SHMA. It was noted that housing market linkages between the two regions are not significant. Cross boundary infrastructure M62 (Hull - Liverpool), Rail Supporting infrastructure eg electricity.

Table 11.2 Collaborative Activity with Neighbouring Authorities

# 11.3 GMSF Objectively Assessed Development Needs Consultation September - November 2014 - Duty to Co-operate Bodies Responses

Organisation	Key Comments
Environment Agency	The vision for the GMS should form the basis for the GMSF which in turn will form one of the key vehicles for GMS delivery.
Warrington Borough Council	Consideration of logistics for the area is a key opportunity within the wider "Atlantic Gateway" context and reference should be made to the Greater Manchester Logistics Study once it is published.

Cheshire East	Agree that the evidence suggests that no adjustment needs to be made to the migration assumptions in the ONS 2012-based population projections, but suggest comparing the ONS 2013 mid-year population estimates with the 2012 subnational population projections as there may be differences ie projected growth vs actual growth.  The OAN is too low but they do not specify any calculated OAN figures.
High Peak Council	Significant increases in net in-commuting should be avoided as this may exacerbate matters on currently constrained transport links that connect High Peak with GM.
Lancashire County Council	Future demand for housing and employment sites in GM may place pressure on areas at risk of flooding.
Natural England	The work being done by GM Low Carbon Hub Natural Capital Group including Red Rose Forest project identifying specific ecosystem service pinch points across Greater Manchester should be at the heart of the plan. They also consider that there are a number of environmental designations and issues which may affect the size, scale, form and delivery of housing sites that should be taken into account.
Blackburn and Darwen Borough Council	Agree with the GMSF OAN.
TfGM	The end date of the GMSF should align with the Transport Strategy 2040. With reference to future transport infrastructure it will be necessary to consider the impact of future development beyond GM boundaries and its impact on GM Transport networks. Improvements planned through One North and reduced travel time to Liverpool and Leeds are likely to increase net in commuting.

Table 11.3 Collaborative Activity with Duty to Co-operate Bodies

# 12 GMSF - Vision, Strategy and Strategic Growth Options - December 2014 to January 2016

12.1 The next stage of the GMSF centered around a public consultation on the vision and strategy and options available to progress the plan. The consultation ran from 9th November 2015 to 11th January 2016.

### 12.1 GMCA Governance: Greater Manchester City Region

Date	Governance	Minutes	Actions
14/01/15	Planning & Housing Commission	Report presented to the commission on the proposed scope of the plan, outcome of the consultation and next steps to be taken.	<ul> <li>GMSF to become a standing item on the agenda</li> <li>A proposal on the role of the commission/scope of the GMSF to be brought to the next meeting</li> </ul>
21/05/15	Infrastructure Advisory Group	Presentation given on City Fringe Developments.	
30/10/15	GMCA/AGMA Executive Board	Report on the Consultation on Vision, Strategy and Strategic Growth Options, formally requests approval for the consultation on strategic growth options beginning on the 9th November for six weeks.	<ul> <li>Note the report and agree the approach</li> <li>Delegate responsibility to make final amendments to the consultation documents to the Lead Chief Executive</li> <li>Agree that GM continue discussions with DCLG as outlined in Section 3</li> </ul>
12/11/2015	GM Local Enterprise Partnership (LEP)	To update the LEP members on the production of the GMSF and the consultation.	Report Noted.

16/11/15	Infrastructure Advisory Group	GMSF consultation on future growth options and call for new development sites. Presentation from United Utilities current and future investment plans.		
02/02/16	Natural Capital Group	Discussed GMSF progress and next steps alongside their Strategic Options Consultation response.		
29/02/16	Planning & Housing Commission	A report was given on the recent Call for Sites consultation alongside the evidence base for the GMSF	•	To note the report, the outcomes of the consultation and next steps
			•	Report on the SHMA be brought to a future meeting
08/03/16	Infrastructure Advisory Group	GMSF Consultation Response discussed: Growth Options for new development sites, Infrastructure Plan and next steps. Transport for Greater Manchester discussed their logistics/freight strategy and air quality action plan. Highways England discussed studies and growth funds.		
30/03/16	Infrastructure Advisory Group	Presentation on the responses from the Strategic Options Consultation. Scoping out the framework for an Infrastructure Delivery Plan.		
29/04/16	Report taken to GMCA/AGMA Executive Board	Update on the Strategic Options consultation given. Responses received from 170 organisations along with 650 sites submitted through the 'Call for Sites' exercise. Majority of responses relate to the ambition of GM and the methodology used to calculate 'Objectively Assessed Need'.	•	Agree the approach to assessing development viability of existing supply  Request a further report in May outlining the preferred growth

				option, implications for land supply and the draft consultation report
30/04/16	Planning & Housing Commission	Presentation given updating members on the Strategic Options consultation	•	Individual authorities to identify any areas or sites they feel have potential to improve the wider housing market
03/05/16	Natural Capital Group	Discussion of the GMSF and Environment Policy Framework		
11/05/16	Infrastructure Advisory Group	Presentation given on key dates in the GMSF.	•	IAG to work with the GMSF team to outline delivery plans associated with strategic development areas including any phasing timescales and density/quantity assumptions
30/06/16	Report taken to GMCA/AGMA Executive Board	The report noted that GM has asked neighboring districts if they can accommodate any of our demand. Burnley have indicated there may be opportunities within their area.		
12/07/16	Natural Capital Group	Discussion of the GMSF and update on the Environment Evidence Base		
26/08/16	Report taken to GMCA/AGMA Executive Board	Report discusses the GMSF evidence base and growth options. It notes that growth prospects within	•	Note the analysis that has been undertaken to inform the economic

AGS 2015 continue to position GM in a leading role within the Northern Powerhouse with an additional 199,700 jobs created over the next two decades.	•	and demographic growth forecasts for the GMSF  Agree the level of
Option 2 was noted as the one which most closely met GM's Objectively Assessed Need for Housing and employment floor space.  It also shows a GVA growth level of 2.5% which is significantly above the forecast for the North of England as a whole alongside an increase in the level of employment in GM higher than that forecast under the transformational growth scenario for the North as a whole (0.7% compared to 0.4%)		growth under AGS 2015 as outlined in paragraph 7.4 should be recommended to the GMCA as the preferred growth option for the GMSF

Table 12.1 Collaborative Activity with GMCA Governance

### 12.2 Neighbouring Authorities Bordering Greater Manchester City-Region

Authorities	Date	Activity	Key Points
High Peak	10/12/14	EIP Submission	AGMA/GMCA made a submission to High Peak's Examination In Public responding to the question - are there any implications for the Local Plan arising from the emerging Greater Manchester Spatial Framework? GMCA stated that Greater Manchester is a single area and despite significant links with High Peak, it did not extended outside of GM into High Peak.
AGMA, Trafford, Stockport, Manchester & Cheshire East	23/06/15	Meeting	AGMA provided an update on GMSF. Discussion around the implications of the Cheshire East Local Plan proposals and updated evidence.
GMCA/AGMA to Cheshire East	10/07/15	Letter	A holding response to Cheshire East's request for views on their updated evidence supporting their Local Plan.

			GM are concerned that increased development in the north of Cheshire East will have an impact on transport infrastructure between Cheshire East and Greater Manchester.
GMCA/AGMA, Stockport, Cheshire East	10/08/15	Meeting	Cheshire East provided an update on their Local Plan Strategy. AGMA provided an update on GMSF and the options proposed. Atkins are conducting detailed work on the impact of the proposed Cheshire East growth on the A34 and its mitigation and this is awaited.
GMCA/AGMA to Cheshire East	24/08/15	Letter	Response to Cheshire East Local Plan  Revised Evidence Base/ Duty to Co-operate. GMCA/AGMA are comfortable withCheshire East's approach to meeting its development requirements and that this can be consistent with GM's own plans. GM raise concerns about the impact of growth in the north of the borough affecting transport infrastructure, which is already under strain. They state solutions need to be found which are both technically feasible and financially viable. They support the suggested update of the SEMMMS strategy.
High Peak	23/11/15	Presentation/Meeting	Presentation providing an update on GMSF, plus evidence related to commuting patterns between High Peak and Manchester. Discussed the GM SHMA, the need for High Peak to liaise with Derbyshire County Council and identify key transport themes. GMCA acknowledged the role of the National Park as a visitor/ recreational destination for GM residents.
Cheshire East, Warrington	26/11/15	Presentation/ Meeting	Presentation providing an update on GMSF, plus evidence related to commuting patterns between Cheshire East, Warrington and GM.

Cheshire East, Warrington	27/11/15	Email	Follow up email from GMCA providing a link to the GMSF Economic Needs Assessment & Oxford Economics and Edge Analytics Analysis Report. GMCA sought comments on these two documents plus the Options Consultation. Also agreed to write to Cheshire East and Warrington to discuss housing requirements.
St. Helen's	30/11/15	Meeting/Email	St. Helen's to report back to Merseyside Planning Officer's Group with a view to circulating a background presentation from GMCA on the GMSF and GMCA planning team to present headline message to Merseyside planners in the new year. GMCA to share Green Belt assessment. GMCA/St. Helen's agreed that infrastructure issues relevant to both areas are limited to transport. GMCA/St. Helens/ Merseyside to facilitate a meeting between transport colleagues to identify the implications of land reviews for planned transport investments. GMCA to share additional information in the new year. St Helen's to formally respond to the GMSF consultation on 11th January 2016.
Chorley	2/12/15	Meeting	Presentation providing an update on GMSF, plus evidence related to commuting patterns between Chorley and GM.
Kirklees and Calderdale	3/12/2015	Presentation/ Email	Presentation providing an update on GMSF, plus evidence related to commuting patterns between Kirklees and Calderdale and GM. Plus follow up email confirming Kirklees and Calderdale commuter flows to and from Greater Manchester are very limited. GMCA directed Kirklees and Calderdale to pieces of evidence related to the South Pennines Local Nature Partnership and an objective

			assessment of existing evidence to determine realistic potential of large scale renewable energy generation, including wind energy.
AGMA/GMCA to Chorley	9/12/15	Email	Follow up email to Chorley from GMCA with the actions from presentation. Green Belt assessment - GMCA to share the methodology for identifying land parcels before the end of the year. GMCA/Chorley to hold a follow on meeting in the new year to discuss transport connectivity issues / logistics along the M61 / M6 corridors / developments close to Coppell Station and any sites that may emerge through the "call for sites" exercise and have cross boundary implications. There may be cross boundary issues / sites that merit a meeting between Chorley/Bolton and Wigan (all three to follow up). A follow up meeting on retail is required in the future.
West Lancs	9/12/2015	Meeting/Presentation	Presentation providing an update on GMSF, plus evidence related to commuting patterns between West Lancs and GM.
			West Lancs will be able to hold a more detailed discussion with Greater Manchester in February/ March 2016 on the draft SHELMA and whether any re-distribution is possible.
Blackburn, Burnley and Rossendale	10/12/15	Email/meeting	GMCA met with Burnley, Blackburn and Rossendale to discuss the GMSF and Strategic Options consultations. Burnley offered to accept additional housing need from GM if it was determined that this was an option that GM wished to pursue.

Table 12.2 Collaborative Activity with Neighbouring Authorities

## 12.3 GMSF: Consultation on Vision, Strategy and Strategic Growth Options - 9th November 2015 to 11 January 2016 - Duty to Co-operate Bodies Responses

Body	Comments
Blackburn with Darwen Council	Blackburn with Darwen Borough Council fully supports the scope and vision of the GMSF. Particular emphasis should be around Pennine Lancashire around the M65 Corridor and Blackburn With Darwen due to the improved rail connectivity. Of the three strategic options, it is considered that 2 and 3 will lead to the greatest pressure on the Green Belt. Either option would have an adverse impact on their aspirational housing growth agenda and it is crucial that they engage with GM to take forward the already improved connectivity links.
Calderdale Council	Calderdale note the need for ongoing dialogue around nature and green infrastructure issues.
Chorley Council	Chorley Council has no objection to the scope of the work in Greater Manchester. It is inclined to support Option 2 because of the evidence on objectively assessed need for housing and accelerated growth scenario assumptions. Chorley Council is unable to provide any deliverable housing sites within their borough that could contribute to meeting any housing shortfall identified in Greater Manchester. They would like to know where the provision of transit provision in relation to gypsies and travellers fits into the GMSF as this is a cross-boundary issue that impacts Chorley and Wigan.
High Peak Borough Council	High Peak Borough Council state the vision should go further to recognise the potential leisure, recreation and health benefits of greater connectivity between urban and rural areas, including those within the wider catchment like High Peak.
	High Peak is fully supportive of the approach of the GMSF towards regeneration, infrastructure, transport and housing. They state it is essential that Greater Manchester seeks to accommodate all of its objectively assessed housing needs, as a fundamental principle of the Framework. Option 1 should not be supported as it would not be in accordance with the requirements of the NPPF whilst Option 2 would have the least implications

	for High Peak and is their preferred outcome. Derbyshire County Council have requested working jointly with GM on potential infrastructure implications of future growth.
Historic England	Historic England refer to the NPPF and the importance of seeking positive improvements in the historic environment. They want the GMSF to recognise and value the importance of it's historic environment and ensuring it is protected throughout the plan process - this could be achieved through this issue having it's own dedicated section within the GMSF. The vision/ambition of the GMSF fails to outline how this will be achieved. Local identity and character need to be referenced in relation to economic issues using the example of mill regeneration to boost the economy. Historic England note that any GMSF option pursued to ensure growth must not put heritage at risk. They do not have any comments to make on any other growth options.
Kirklees Council	Kirklees Council support strategic growth option 2, however there is a general concern that trans-pennine transport issues generated by this scale of growth have not yet been fully assessed. They would like to see robust and credible evidence regarding the trans-pennine transport infrastructure implications and agreed mitigation measures between the Leeds City Region LEP, the West Yorkshire Combined Authority, Highways England, AGMA and Kirklees Council.
Natural England	The natural environment is not sufficiently represented in the scope of the GMSF and it would be beneficial to take a strategic view of GM's green infrastructure. The main focus is on economic development at the expense of the natural environment. It would be beneficial to take a strategic view of Greater Manchester's green infrastructure and ecological networks in order to maximise opportunities.
Rossendale Borough Council	Rossendale note that their development opportunities are constrained due to parts of the borough (particularly the south) designated as Green Belt. This, combined with a lack of road infrastructure, means that Rossendale is not in a position to take any of Greater Manchester's development needs. They would also be concerned if the spatial distribution in Greater Manchester as a whole leads to pressure being put on Rossendale to accommodate further development provision. They strongly request they are involved closely with the development of the evidence base. Favour growth option 2 out of the available options.
Warrington Borough Council	Warrington Borough Council did not have any fundamental concerns or comments to make. They welcome the opportunity to work with AGMA in the future as the plan progresses and also as Warrington looks to update their local plan in future.

Borough Council	West Lancashire broadly supports the vision and ambition set out in the Strategic Options document, particularly the continued development of transport linkages westwards from Greater Manchester. Skelmersdale is a key growth area for West Lancashire and is close to the boundary with Wigan and one key project the Council is working on is the rail link into Skelmersdale off the Wigan-Kirkby line. They would be happy to support either Option 2 or Option 3.
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Table 12.3 Collaborative Activity with Duty to Co-operate Bodies

# 13 First Draft of the Greater Manchester Spatial Framework - February 2016 to January 2017

13.1 The next stage of the planning process was the publication of the first draft of the GMSF. It went out to an extended public consultation from 31st October 2016 to 16th January 2017.

#### 13.1 GMCA Governance: Greater Manchester City-Region

Date	Governance	Minutes	Actions
30/09/16	Report to GMCA/AGMA Executive Board	This report updates the Board on the next stage of the GMSF and seeks approval for a formal consultation process which will be carried out in line with the Statement of Community Involvements of the 10 local planning authorities.	<ul> <li>Note the report and agree the approach</li> <li>Delegate responsibility to make final amendments to the consultation documents to the Lead Chief Executive</li> </ul>
07/10/16	GM Low Carbon Hub	Presentation/update given on the GMSF.	
10/10/16	Infrastructure Advisory Group	Agenda included HCA Update, 100 Resilient Cities, GMSF and infrastructure with input from UU/ENW/NG/EA.	
10/11/2016	GM Local Enterprise Partnership	Draft GMSF Report and Presentation.	Report Noted.

28/10/16	Report to GMCA/AGMA Executive Board	This report updates the Board on the next stage of the GMSF and seeks approval for a consultation process under regulation 18 of the	•	Note the report and agree the approach
		Town and Country Planning (Local Planning) (England) Regulations 2012.		Approve the Draft GMSF, approach to site prioritization, and Integrated Assessment for consultation
			•	Delegate responsibility to make final amendments to the consultation documents to the Lead Chief Executive
30/11/16	Natural Capital Group	Natural Capital Group Consultation Event on the draft GMSF.		
12/12/16	Infrastructure Advisory Group	Urban Pioneer/Natural Course. Energy Catapult briefing and key messages from GMCA Low Carbon Team. GMSF Infrastructure deep dive with input from UU/ENW/NG/EA.		

Table 13.1 Collaborative Activity with GMCA Governance

### 13.2 Neighbouring Authorities Bordering GM City-Region

District	Date	Activity	Key Points
GMCA	March 2016	Comments invited	Green Belt Assessment  Consultation with the neighbouring Duty to Cooperate authorities was undertaken on the proposed methodology used in the Green Belt Assessment and comments were invited from these partners on the draft findings.

			The Duty to Co-operate partners for the Greater Manchester Green Belt study include:  Blackburn Calderdale Cheshire East Chorley High Peak Peak District National Park Kirklees Rossendale St Helens Warrington West Lancashire  Comments received were discussed with the Steering Group and incorporated as appropriate.
GMCA	7/06/2016	Email	Meeting Greater Manchester Housing Need  GMCA sent an email to the following local authorities explaining that the next stage of the GMSF will be a draft plan and asking if any of the LA's could help contribute to GM's housing requirement to 2035:  Chorley Rossendale Blackburn Borough Council St. Helens MBC Warrington BC Burnley High Peak West Lancs Calderdale Kirklees Cheshire East

Warrington	27/06/16	Email response to GMCA 7/06/2016	Warrington is still in the process of understanding the implications of meeting its own objectively assessed development needs and therefore are not in a position to contribute to GM requirements.
West Lancs	27/06/16	Email response to GMCA 7/06/2016	West Lancs will embark on a Local Plan Review this year with a view to potentially adopting a new Local Plan by 2020. A key first step in this process is the preparation of the Liverpool City Region SHELMA currently being undertaken. Until they know the results of that study it is difficult for the Council to be able to provide a definitive response to the question of whether or not they can contribute to GM's housing delivery or employment land need. They also refer to the anticipated growth in demand for logistics space generated from the opening of Liverpool2 container terminal at Port Liverpool and the need to accommodate this within a reasonable drive time of the Port. In addition, they await the results of the Greater Manchester Green Belt review before considering the merits of releasing land from the Green Belt in Greater Manchester versus land in West Lancs. Until these factors are fully explored West Lancs is unable to respond definitively that it will not be able to take any of Greater Manchester's housing and employment need.
Calderdale/Kirklees	30/06/16	Email response to GMCA 7/06/2016	Kirklees have confirmed they are a relatively self-contained strategic housing market area and are part of a wider functional economic market area, predominantly with the rest of the Leeds City Region. The initial GMSF evidence base is that the findings also indicated a relatively minor relationship with Kirklees in terms of travel to work, and housing/economic market geography.  In addition, Kirklees is planning to accommodate all of its own objectively assessed needs for jobs and homes within

			its own district. This means the council is already having to turn to large sections of the green belt to accommodate this need. It is therefore very difficult to see any additional opportunities to accommodate additional growth for Greater Manchester beyond meeting our own needs.
Rossendale BC	01/07/16	Email response to GMCA 7/06/2016	Given the nature and incidence of Rossendale's development constraints, including topography, flood risk and accessibility/connectivity issues, it is unlikely that we could accommodate any additional land over and above this Borough's own housing requirement, unless there are any innovative solutions that can be identified.
Blackburn	19/07/2016	Email response to GMCA 7/06/2016	The economic growth planned in Greater Manchester will lead to an expansion of the geographical area from which significant numbers of people commute into GM. Over the timescales in question this will translate into an increase in levels of commuting into GM from Blackburn with Darwen. It is expected this impact will be over the medium term and that a housing requirement taking into account increased commuting into GM would consider the period after 2026. Importantly, we would not view this as a necessity to accommodate an unmet need arising in GM, but rather to plan in response to changing travel-to-work footprints and local policy objectives.
Calderdale/Kirklees	08/09/16	Email response to GMCA 7/06/2016	Calderdale and Kirklees are not in a position to take any additional housing requirement from surrounding areas, including GM. A further issue is that Calderdale effectively has a relatively self-contained housing market and any linkages to authorities across the Pennines are extremely limited as evidenced by the SHMA.

Cheshire East	29/11/16	Meeting	More explicit wording needed on transport and linkages. GM2040/SEMMS2 findings due June 2017. Cheshire East's Cabinet are concerned as well / relationship with Handforth North Cheshire Growth village (2,200 homes) - work needed on social infrastructure and new education facilities.
Chorley	06/12/16	Meeting	Update on local planning position, housing and evidence. GMSF issues discussed included net out migration, commuting and updating the Gypsy Travellers Accommodation Assessment.
Warrington/ St. Helens	13/12/16	Meeting	Working on a joint SHELMA with the Liverpool City Region - expected late January/ early February 2017.
			Need to ensure GMCA/LCR aren't double counting the need for logistics. Warrington seeking access to the Irlam/Cadishead site from Warrington.
Rossendale	16/12/16	Meeting	Lancashire M66/A56 study published and requires TfGM liaison. M66 corridor is critical for Rossendale as housing and employment sites are located along the A56 corridor with M66 acting as the gateway. M66 improvements will benefit Rossendale.
West Lancs	21/12/16	Meeting	Support the proposals at J25/26 of the M6 and agreed to discuss joint work with St Helens.
Calderdale/Kirklees	22/12/16	Meeting	Noted that improvement to transport will support commuters to and from Calderdale, Kirklees and Greater Manchester.
High Peak	10/01/17	Meeting	Discussed a range of issues including potential devolution proposals between Derby, Derbyshire and Nottingham. Discussed landscape issues and how to reflect these in the GMSF – including sites close to National Park. Discussed Stockport (A6) Poynton relief Rd (A6MARR) and High Lane.

			SEMMS re-fresh is underway (due Spring 2017) and will explore issues with the A6 and deliverability of the High Lane proposal.  A627 Mottram / by-pass – Highways network critical and will determine sites and phasing.  Minerals and waste – GM imports crushed rock from Derbyshire County Council. If development is stepped up it will require an increase and their is concern over whether this can be met. Agreed to monitor through the Local Aggregate Assessment and maintain discussions through existing working groups.
Blackburn with Darwen	12/01/17	Meeting	Discussed the following issues: housing OAN, sustainable transport connectivity, increased commuting rates to GM. Support a joint approach to establishing commuting assumptions to feed into housing requirements modelling work looking beyond the existing BwD Local Plan i.e. for 2026 – 2035.

Table 13.2 Collaborative Activity with Neighbouring Authorities

## 13.3 Consultation First Draft GMSF - 31st October 2016 to 16th January 2017 - Duty to Co-operate Responses

Organisation	Key Comments
High Peak Borough Council	High Peak confirmed that they are unable to accommodate any of GM's Objectively Assessed Housing Need. The high level of employment provision within GM has the potential to divert employment investment from outside GM to GM sites. The spatial distribution strategy for growth and associated housing and employment land requirements, should be informed by a comprehensive Green Belt Review. High Peak are keen to continue to work with the Greater Manchester authorities and others to improve transport connections along the A6 corridor and the A57/A628. The High Peak Borough Council and Derbyshire County Council, as Highway Authority, requested future opportunities to work jointly with the Greater Manchester Authorities to assess the potential implications of the preferred scale and distribution of growth on Derbyshire's infrastructure, particularly the highways

and public transport including rail networks. In relation to proposed site OA21 High Lane, High Peak acknowledge that the transport infrastructure to be provided or contributed to will be informed through the refresh of the South East Manchester Multi-Modal Study currently being undertaken. High Peak and Derbyshire County Councils would like to be included in this work to address potential concerns that this development may impact on congestion on the A6 increasing journey times for the existing residents of High Peak and adding pressure to public transport services that serve the A6 corridor. They would like clarification on the implications for the A6 Corridor Study and its recommended mitigation strategy. Other comments related to: off-road cycling/walking/ horse riding route through Hadfield and Glossop; alignment of housing and employment floorspace; school capacity; national park gateway .

#### West Lancashire Borough Council

Support for GMSF meeting its OAN, policy SL10, and the proposed allocation within the Corridor at Junction 25 and 26 of the M6. In policy GM6 Accessibility, reference should be made to connections to/from surrounding areas outside Greater Manchester, this is to ensure policy support exists for the Skelmersdale Rail Link and improvements to the Southport - Manchester Services. The policy should also make reference to improvements to M6/M58 interchange and proposed M58 link road to Wigan. GM7 would benefit from reference to cross boundary green infrastructure connections.

## Cheshire East Council

In terms of Duty to Cooperate Cheshire East states communications between Cheshire East and GM have been good so far. Comments related to : growth assumptions and the implications; development distribution, Green Belt and Site Selection; transport and the GM Transport 2040. Cross boundary issues relate to the SEMMMS refresh. Cheshire East Council is concerned at the limited information on transportation and its role in site selection. They are concerned about the impact of the level of growth within GM on the transport routes between Greater Manchester and Cheshire East.

Measures should be included in the supporting plan policy's to encourage more sustainable modes of cross boundary commuting into / out of Cheshire East along.

The Implications of the new proposed new HS2 station at the Airport need to be fully accounted for in the patterns of movement and development.

They also raise concerns around potential impact on the demand for social infrastructure generated from growth in GM.

	In terms of Woodford they raise concerns about : the impact on Green Belt and the potential merging of settlements in this area; the need to understand the impact on the road network from growth at Woodford and the mitigation recommended in the SEMMS refresh; CEC are of the view that the Poynton Relief Road is a prerequisite for the delivery of this site and as such this scheme should form part of the TfGM Transport Strategy; they suggest a policy to improve linkages to Poynton Railway Station and suggest the site would benefit from Metrolink access. As a proposed alternative approach they suggest expanding North Cheshire Garden Village.
	Additional comments are made on the following policies:
	High Lane concerns relate to the impact on A6 and air quality.
	A34 Cheadle and impact on A34;
	Heald Green linkage to Heald Green Railway Station; and
	Airport - wishes exceptional circumstances to be demonstrated for release from the Green Belt and also an assessment of additional traffic through Wilmslow.
Chorley Council	Chorley believe GMCA is fulfilling their duty to cooperate responsibilities with Chorley. Chorley confirms that they are unable to accommodate any of GM's housing requirement. They are concerned about Gypsies, Travellers and Travelling Showpeople transit site provision.
Peak District National Park	Comments relate to: impact of growth on the National Park roads; how the setting of the National Park is affected by Fletchers Mill proposal OA12; concern about OA26 Mottram M67 and the impact on the A57/A628/A616, crossing the National Park; and OA21 High Lane and impact on roads crossing the National Park.
Blackburn & Darwen Borough Council	Comments relate to :rates of commuting increasing from BwD into GM as a result of planned growth in GMSF. BwDBC is supportive of a joint approach to establishing commuting assumptions to feed into housing requirement modelling work.
	The focus of the further forecasting work should be on the period beyond the current BwD plan horizon, ie for the period 2026-2035. Several of the major sites allocated for housing development in BwD's Local Plan are expected to continue to deliver housing beyond the 2026 end date for the current BwD plan, indicating an available land supply to accommodate growth arising from commuting into GM.

	BwDBC anticipates that the next steps in light of its comments would be:
	A joint review of existing evidence around commuting rates, growth of passenger numbers on key public transport corridors, etc.
	New joint forecasting work considering realistic assumptions about future commuting rates between BwD and GM
	Consideration of the implications of the above for the OAN identified for GM, and for future assessments of OAN in BwD
	Refinement of the evidence base and strategic policy response in relation to infrastructure connecting BwD and GM
Rossendale Borough Council	Rossendale confirm they expect Rossendale to be a self contained housing market area. They confirm they are unable to take any housing need from any other borough. They express concerns about employment growth in GM and particularly Northern Gateway SL6 and NG1a/c and the impact this may have on existing infrastructure in and around Rossendale. They consider that transport improvements need to be considered strategically including the M66/A56 and seek further consideration of improvements to public transport links into Rossendale. They refer to the proposed freight rail link via the ELR and the need to consider this as a commuter rail link. Specific comments relate to OA6 Gin Hall and the impacts on the M66 Junction 1 and A56; GM21 Education Skills and Knowledge; OA2 Elton Reservoir and a new metrolink stop; and cross boundary issues related to GM2 Green Infrastructure, GM10 Uplands, GM12 River Valleys, GM14 Recreation and GM16 Resilience.
Warrington Borough Council	Warrington would like the opportunity to discuss the proposed Western Cadishead and Irlam Strategic Site with Salford, in particular how the site will be accessed and how other required infrastructure works are envisaged to be delivered. Warrington Council would like to understand whether there are any implications for the adjacent land within Warrington, which is currently designated as Green Belt.
Environment Agency	Wide ranging comments seeking a stronger emphasis on making development sustainable, climate change resilience, promoting natural capital approach in GM and introducing targets for environmental policies. Suggests amendments to a wide range of policies.
Historic England	The GMSF fails to recognise the historic environment as a strategic priority. The GMSF needs to assess the impact of GMSF policies on historic assets. Historic England make a number of specific comments on policies in the

	GMSF reiterating the point that they do not adequately recognise the role of the historic environment or assess the impact of development on the historic environment. They make comments on most policies but express objection and strong objection to policies WG2, NG3, EG1, ELR5, OA1 and OA25.
Natural England	Generally, the comments relate to a desire to see a stronger link between integrated networks of high quality green infrastructure identified as priorities in the GMSF ie trees and woodlands, the uplands, lowland wetlands, river valleys and canal and recreation areas and the strategic locations and allocations. They make a number of suggested amendments to thematic, strategic location and detailed allocation policies. They request further information setting out how green infrastructure has informed decision making in the selection of sites. They suggest a Green Infrastructure Needs Assessment should be undertaken. They suggest GMSF should identify new elements of the network or specify the approach to bringing these forward through Local Plans, SPD's or Masterplans. They suggest strategic policy should seek to achieve net gains for nature, make greater reference to National and European sites, address impact of development on air quality, adopt the mitigation hierarchy. They also make comments on the Habitat Regulations Assessment and Integrated Assessment.
Civil Aviation Authority	No comments received.
Homes and Communities Agency	Supporting comments.
Clinical Commissioning Groups	Salford Clinical Commissioning Group have raised concerns about air quality in Salford and have requested that the plan is more specific on this issue. They seek greater social value from economic growth, reduced social inequalities and more equal and integrated communities. Despite accepting that Green Belt loss is part of the plan they are concerned about the health implications of loss of open space. They do not believe that the plan adequately addresses the implications of the growth planned on health and social services. They request earlier involvement in the design of development to enable them to determine the health service needs of proposed residents.  Bury Clinical Commissioning Group seek greater inclusion of reference to S106 and Community Infrastructure Levy.
Office of Rail Regulation	No comments received.

Transport for Greater Manchester	No comments received.
Highways Authority	No comments received.
Greater Manchester Natural Capital Group (Local Nature Partnership)	The comments submitted have been collated from a Natural Capital Group Conference examining the draft GMSF. The general view being further work and clarity was required around delivery of Green Infrastructure and how this is to be monitored and measured. They also stated that GMSF needs to define a Green Infrastructure Network; identify a range of measurable targets; achieve a net gain in biodiversity; progress an ecological framework; review the approach to SBI policy; adopt a brownfield first approach; and reduce the risk of flooding through the provision of Green Infrastructure.
Greater Manchester Local Enterprise Partnership	No comments received.

Table 13.3 Collaborative Activity with Duty to Co-operate Bodies

# 14 Second draft of the Greater Manchester Spatial Framework - February 2017 to March 2019

14.1 The second draft of the GMSF is due to be published in June 2018. This section will detail the meetings and actions that took place before and after the publication of the second draft.

#### 14.1 GMCA Governance : Greater Manchester City-Region

Date	Governance	Recommendations	Actions
14/02/17	Natural Capital Group	The group was provided with a presentation from the GM Ecology Unit on work to develop the environmental policies within the GMSF.	<ul> <li>Produce an issues and options paper on environmental targets</li> <li>Explore how other cities are</li> </ul>

				approaching environmental targets as part of the Urban Pioneer project
13/03/17	Infrastructure Advisory Group	United Utility preparing future investment plans and understanding Greater Manchester's priorities. 2020-25 business plan submission taking into account GM's needs and ambitions.  Brownfield/contaminated land remediation costs calculator. RESIN - Critical Infrastructure Assessment. GMSF update also given.		
31/03/17	GMCA/AGMA Executive Board	Update given on responses to the draft GMSF consultation.	•	That the report be noted and the proposed timetable in Section 5 be agreed
05/04/17	Planning & Housing Commission	Update given on the responses to the draft GMSF consultation.	•	To note the report/comments and agree to the proposed timetable
			•	To receive a further update at the next Planning & Housing Commission

09/05/17	Infrastructure Advisory Group	Overview of the concept planning framework used by districts was given alongside a presentation on the Northern Gateway site in the GMSF.	To provide feedback on the approach to concept planning
11/05/17	Natural Capital Group	The group was provided with a GMSF update presentation which also covered the development of natural environment targets.	Group     members     will be     invited to the     existing     sub-group     on natural     environment     targets
02/06/17	Strategic Estates Group: Chairs and Partners Forum	Update presentation on GMSF. Majority of housing planned in urban areas. Suggestion to strengthen links with GM Estates Programme both at GM and Locality Level. Greater Manchester Health and Social Care Partnership, to share information on Surplus Land as well as details of the ten SEG chairs so planning officers can get in touch and attend meetings. Suggestion that need to join up plans for conversation with communities in the future.	
19/07/17	Natural Capital Group	Consideration was given to papers circulated prior to the meeting that updated the group on the work to develop natural environment targets for the GMSF.	<ul> <li>That the report be noted</li> <li>Officers to feedback their comments by the end of August</li> <li>Update to be given at the next meeting</li> </ul>

04/07/17	Infrastructure Advisory Group	Presentation was given to the group on the emerging concept plan for the Northern Gateway allocation. Also a report on developing integrated water management options for strategic sites focusing on Northern Gateway, GMSF/UU strategy timetabling, inputs to Strategic Flood Risk Assessment and joint working and touch points between UU and GMCA.	IAG infrastructure providers to work with the group to ensure there are no significant issues with existing or future services/utilities
28/07/17	GMCA	Revised GM Strategy Refresh approved.	
07/09/17	GM Housing Planning and Environment Overview and Scrutiny	Scrutiny was asked to comment on the proposed approach to the rewrite of the GMSF and in the report reference is made to the Mayor's request for a radical rewrite of the GMSF, including a substantial reduction in the loss of green belt	
11/09/17	Infrastructure Advisory Group	Natural Course project and the River Irwell, Cadent (formally National Grid) 2050 and the role for Gas Networks, ENWL overview of existing and future electricity challenges and the implications for Greater Manchester. Greater Manchester Digital Infrastructure Plan and Greater Manchester Resilience/C100 Cities.	
14/09/17	Planning and Housing Commission	Anne Morgan gave a presentation on the progress of the GMSF, including milestones to June 2018 and publication of Objectively Assessed Housing Need.	
29/09/17	GMCA	Greater Manchester Draft Digital Infrastructure Implementation Plan.	New GMSF development to refer to digital connections
03/10/17	Low Carbon Hub	The report on the GMS recognises the role of the GMSF in implementing the spatial elements of the Strategy.	

18/10/17	GM Housing Planning and Environment Overview and Scrutiny	The report notes that the consultation on the standardised methodology for calculating Objectively Assessed Housing need was published on the 14 September for 8 weeks, ending on 9 November 2017. It also reports on the published Draft GMSF 2016 consultation responses, of which 27,000 were received.	
10/11/17	GM Housing Planning and Environment Overview and Scrutiny	Presentation given on the Greater Manchester Transport Strategy 2040.	
14/11/17	Infrastructure Advisory Group	TfGM summary of findings from Phase 1 GM Transport Evidence Study. Greater Manchester Digital Infrastructure Group Update. Future City Catapult. Interim National Infrastructure Assessment.	
24/11/17	GMCA	Report of the Planning for the Right Homes in the Right Places consultation, which notes that the GMCA supported the principle of a standard approach to calculating local housing need	Endorse GMCA's response to the consultation
14/12/17	Planning and Housing Commission	The report provides an update into communications and engagement for the Greater Manchester Spatial Framework. A presentation was given on developing the vision and strategy and there was a general verbal update from Anne Morgan	
15/01/18	GM Housing Planning and Environment Overview and Scrutiny	The report covers the following key areas of work: continued development of the of the supporting evidence base; development of a wider communications strategy and engagement process; and development of draft GMSF 2018. The main focus of the GMSF core team and district colleagues is in updating the land supply, including further work to look at opportunities to increase densities	

		and make more of town centres. The report notes that the Greater Manchester Strategy was the starting point for the development of the next version of the GMSF, and the vision and priorities will guide the GMSF strategy.	
15/02/18	GM Housing Planning and Environment Overview and Scrutiny	Presentation given which covered the following: Proposed approach to GMSF 2018; Proposed structure; Wider engagement; Timetable to June; Opportunities for district involvement. It included key elements of the revised plan, such as reducing the amount of green belt released, increasing densities on sites and producing a sound plan.	
08/03/18	GM Freight Forum	Discussion covered Update on Clean Air Plan and Potential Implications for the Logistics Sector - Environment and Active Travel, TfGM; Parcels by Rail into Manchester - InterCity Rail Freight; GM Cycle Logistics - Director Last Mile Logistics, Jobcentre Plus working with the logistics sector - DWP National Employer and Partnership Team; Travel Demand Management in Greater Manchester - TfGM.	
13/03/18	GM Housing Planning and Environment Overview and Scrutiny	Report to update scrutiny members on the GMSF. The report covered 3 main areas: Publication of the existing land supply information; Consultation on Draft National Planning Policy Framework (NPPF); and Publication of new Sub National Population Projections and Sub National Household projections.	That the committee note the report.  That the draft NPPF consultation response be considered by the Committee on 17 April 2018.
16/03/18	Planning & Housing Commission	Members received a brief report giving a summary of the issues and actions from the GMSF workshop, under three key headings. Existing Land Supply: it was suggested that a development session be arranged for Members to go through the figures in more	Arrange a development session for Members to go through the existing land

		detail and the assumptions behind them. A media release is currently being approved and will be circulated to Members and GM Leaders. GMSF: a small working group has been convened, if Members require a session for all Members can be arranged to be held in April. Communications: Jane Healey-Brown and Garreth Bruff are meeting with Urbed to discuss communication plans. Members received a presentation from Mia Crowther, TfGM which gave an update on the GMSF Transport Study Evidence Base.	supply figures in more detail. Circulate a copy of the final land supply press release to Members and GM Leaders. Note the contents of the presentation. Part one of the Transport Study to be circulated to GM Leaders. Circulate the presentation to Members.
16/03/18	Transport for Greater Manchester	The Greater Manchester Transport Strategy 2040 document was prepared in consultation with the ten Greater Manchester District Councils along with representatives from Highways England and the team preparing the Greater Manchester Spatial Framework (GMSF). TfGM have been developing a GMSF Transport Study to enhance and present our understanding of the key current and future transport issues for GM in the context of planned growth, including that coming forward through GMSF. The study will also identify the broad transport interventions that are likely to be required to address these issues and support the planned growth.	
27/04/18	GMCA	Item on NPPF consultation notes that the GMSF will be a strategic plan to deliver sustainable development. It will play a huge part in securing the future success of Greater Manchester as we build a powerhouse of the North which reaches its full potential.	

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05/06/18	GM Housing Planning and Environment Overview and Scrutiny	Paul Dennett provided an update on the Greater Manchester Housing Package. In return from the government package, it was noted that GMCA committed to: the GM Spatial Framework (GMSF) delivering 227,200 homes between 2015/16 and 2034/35, as per the previous consultation draft GMSF, and continued progress with GMSF to reach adoption by late 2020, subject to the examination process.	
08/06/18	Economy, Business Growth & Skills Overview & Scrutiny Committee	The report acknowledges Manchester Airport as a key growth location and a gateway to the north.	
29/06/18	GMCA	Paul Dennett provided members with an update on the proposed timetable for the GM Spatial Framework (GMSF) following the recent decision of the GMCA to delay the consultation until October 2018. Following approval of the draft consultation in October 2018, there will be a 12 weeks consultation between November-January 2019.	
06/07/18	Low Carbon Hub	Simon Nokes reported that at the Greater Manchester Combined Authority (GMCA) meeting on 29 June 2018 Leaders agreed that the Greater Manchester Spatial Framework (GMSF) would be delayed until October 2018 following the publication of new official population projections. This would allow the GMCA to ensure that the GMSF used the most up-to-date figures to plan for the right number of new homes in the city-region.	That the update be noted.
12/07/18	GM Housing Planning and Environment Overview and Scrutiny	Report from Anne Morgan to update the Committee on the GMSF. Consultation on the next version of the plan was intended to be July 2018. However, the GMCA agreed at its meeting on 29 June to delay the consultation until October. The driver for the delay was the need to consider carefully the implications of	

		the Office for National Statistics' (ONS) 2016 Sub National Population Projections (SNPP) published on 24 May 2018. The Chair updated the Committee that a decision in principle had been taken by the GMCA that the GMSF move from a Joint Development Plan Document (DPD) to a Spatial Development Strategy (SDS). It was advised that at this stage it remained a decision in principle only and no final decision had been made.	
27/07/18	GMCA	A report to update GMCA on the proposed timetable for the Greater Manchester Spatial Framework (GMSF) following the decision at the GMCA meeting on 29 June to delay the consultation until October.	
16/08/18	GM Housing Planning and Environment Overview and Scrutiny	Consideration was given to a report that provided an outline of the process undertaken by the GMCA, the districts and TfGM to understand and address the implications of housing and employment growth in GM on transport systems as part of the Greater Manchester Spatial Framework. Mia Crowther, Senior Transport Strategy Officer, TfGM provided the Committee with a presentation which updated members on the transport evidence work to support the GMSF.	
13/09/18	Planning & Housing Commission	GMSF update, presentation by Anne Morgan. Chris Findley provided members with an update on the GMSF. The timetable, plan structure including the scale of growth and the alignment with a GM infrastructure strategy along with planned communications and consultation were outlined. In addition, Leaders requested a short 'Housing Vision' document be drafted to set out a vision for the future of housing in Greater Manchester, to accompany the forthcoming consultation on the Greater Manchester Spatial Framework. This report noted: In setting the future direction of Greater Manchester's spatial development through the GM Spatial Framework, one vital element is	

		the need to ensure GM residents have the safe, decent and affordable homes the Greater Manchester Strategy requires.	
13/09/18	GM Housing Planning and Environment Overview and Scrutiny	Natural Capital and Urban Pioneer Update from Mark Atherton, which noted that the work had involved working closely with the GMCA Planning team to ensure GMSF has a strong Net Gain commitment that can be delivered on the ground.	
14/09/18	Transport for Greater Manchester	A report to outline the process undertaken by the GMCA, the districts and TfGM to understand and address the implications of housing and employment growth in GM on transport systems as part of the Greater Manchester Spatial Framework (GMSF) process.	
17/09/18	Local Enterprise Partnership	Consideration was given to presentation that updated the Board on the progress being made with the Greater Manchester Spatial Framework (GMSF) and Infrastructure Framework.	That the contents of the report be noted.
11/10/18	GM Housing Planning and Environment Overview and Scrutiny	As an introduction to the report on the GM Housing Vision, Paul Dennett provided the Committee with an update with regards to the GMSF. GMCA had issued a statement with regard to delayed publication of the GMSF in light of the unanticipated significant drop in housing need in GM. The Committee were informed that GM Leaders would meet the following week to consider the latest position and further updates would emerge.	That the report be noted.  To note further updates to be provided once further details emerge
15/11/18	GM Housing Planning and Environment Overview and Scrutiny	Members received a briefing on the GMSF. The Government's consultation around the revised methodology for assessing local housing need was due to close on 7 December and that this was crucial to the development of the revised GMSF. Update from the Mayor on the GM Strategy Implementation Plan and Performance Dashboard, which includes the GMSF at several points in the programme.	

04/12/18	Planning & Housing Commission	The Chair, Paul Dennett, provided members with a verbal update on the progress on the GMSF. It was advised that a report would be presented to a special joint meeting of the Greater Manchester Combined Authority (GMCA) and AGMA Executive Board on Friday 11 January 2019 in Trafford. It was confirmed that following this draft, a further consultation would take place in Summer 2019 based on the results of the consultation, that the Transport 2040 Delivery Plan would be published for consultation alongside the GMSF, and that the GMSF would require unanimous support from all districts and that leaders had agreed that the formal draft would be subject to approval by all councils prior to the next consultation.	That the update be noted.  That the comments from members of the Planning and Housing Commission are observed.
10/01/19	GM Housing Planning and Environment Overview and Scrutiny	Members were informed that the next draft of the Greater Manchester Spatial Framework (GMSF) had been published, and was due to be discussed at the GMCA meeting on Friday 11th January. It was confirmed that the GMSF and the TfGM 2040 Transport Strategy would be considered by the Committee in in February.	
10/01/19	Transport for Greater Manchester	A report introduced the Greater Manchester Transport Strategy 2040 Draft Delivery Plan (2020-2025) which has been developed in conjunction with the GMSF. It sets out the background, purpose of the plan and the timeline for publishing a final version of the Delivery Plan in 2019.	
11/01/19	Joint GMCA and AGMA	A report to update GMCA/AGMA Executive Board on the next stage of the Greater Manchester Plan for Homes, Jobs and the Environment – the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF: Revised Draft 2019) and to seek approval for a consultation process under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation will begin on 21 January 2019 for 8 weeks, ending on 18 March 2019.	

14/01/19	Local Enterprise Partnership	A report 'Future of Greater Manchester' provided an update on the progress of the GMSF.	
18/01/19	Low Carbon Hub	The Chair reported that an event, held on 7 January 2019, saw the launch of the 'The Future of Greater Manchester' report alongside a number of policy initiatives. The Chair noted that the draft GM Spatial Framework is a key element of this policy platform and sends a powerful message to potential partners and investors in GM. It sets out a long term plan for sustainable development with a focus on brownfield sites for housing or business needs. The Chair further reported that the plans sets out proposals to reduce Greater Manchester's carbon emissions from new buildings alongside a presumption against fracking.	
14/02/19	GM Housing Planning and Environment Overview and Scrutiny	Report of Paul Dennett, The Future of GM Strategic context paper, which referred to the GMSF as a key element in the strategic context. Scrutiny members were asked to give their views on the GMSF Consultation Draft, as part of the consultation process. GM Transport Strategy 2040 Draft Delivery Plan (2020-2025) report, which had been developed in conjunction with the GMSF, to demonstrate to an inspector that there is a plan for the delivery of the transport elements of the GMSF.	Consider the GMSF Consultation Draft.
05/03/19	Planning & Housing Commission	The Commission received a very brief update on the GMSF consultation, 3000 responses have been received so far with transport being a large thematic area of feedback. Future of Greater Manchester report: the Commission was asked to consider: The Future of GM Strategic context paper and a number of the key elements referred to in that strategic context, including the GMSF Consultation Draft.	Paul Dennett to share the draft response sent to the Housing Minister.

GM Housing	The Draft 5 Year Environment Plan was	
Planning and	considered. It was noted that the GMSF	
Environment	includes a proposal to require all new housing	
Overview and	developments to be Net 0 Carbon by 2028.	
Scrutiny		
	Planning and Environment Overview and	Planning and considered. It was noted that the GMSF includes a proposal to require all new housing developments to be Net 0 Carbon by 2028.

Table 14.1 Collaborative Activity with GMCA Governance

### 14.2 Neighbouring Authorities Bordering Greater Manchester City Region

Date	Activity	Key Points
19/01/17	Meeting	Haydock point – J23 looking at the whole junction (working with Wigan). Requires a conversation between Wigan and St Helens on the spec for joint piece of working covering: market demand, transport capacity and solutions and existing land supply. Explore the A580 and NW quadrant study options.
27/03/17	Meeting	West Lancashire held a Duty to Co-operate Meeting on their Issues and Options for their Local Plan.
13/06/17	Meeting	GMSF Update, including Rochdale, Bury and GMCA are working with Atkins to develop a Masterplan for the Northern Gateway.  Rossendale's SHMA - Rossendale's Housing Market Area no longer corresponds with the Borough boundary, having a self-containment rate of less than 70%. Movements are mainly with Bury (especially Ramsbottom) and Rochdale. In an approach similar to that adopted by High Peak, RBC is advocating using the Borough boundary for the purposes of the SHMA. This received general support.  Employment - High rates of commuting out of the Borough for work. Discussed the implications of the "Northern Gateway" and its potential to attract commuters from Rossendale. Rossendale has an issue with finding employment land in the west of the Borough near the A56.  Retail -Potential of the Pennine Bridleway links
	19/01/17	19/01/17 Meeting  27/03/17 Meeting

			Transport - The importance of improving the A56/M66 corridor and having an integrated approach to transport masterplanning of the "Northern Gateway"  Environment - various studies and issues discussed including Rochdale acknowldging they are looking to identify Scout Moor as an area of search for large wind turbines.  Duty to Co-operate - approach will be conducted through a letter from the relevant parties and not a memorandum of understanding. A consensus has been reached between Rossendale and GMCA on the approach to the HMA.
Stockport, Tameside, High Peak, Derbyshire, TfGM, Manchester, Peak District, Cheshire East Council	July 2017	Workshop	South East Manchester Multi Modal Study workshop with Atkins.
St. Helens, Wigan	18/07/17	Meeting	Letter dated 18 <sup>th</sup> July to Mike Palin, Chief Executive St. Helens Council from Karl Battersby Director Economy and Environment showing Wigan have agreed to fund 5% of the M6 Junction 23 Feasibility Study- Liverpool City Region Single Investment Fund.
			This study is examining the need for improvements to this junction as a result of increased freight traffic from employment sites Liverpool 2/ Superport and Knowlsey Industrial Park and also sites in Wigan along the East Lancs

			If improvements are required these may be programmed into Highways England Road Investment Strategy to prioritise for public sector funding for after 2019/20.
Bury Clinical Commissioning Group, Bury MBC	27/07/2017	Meeting	Bury Council outlined latest on GMSF and Local Plan and requirements for evidence to support allocations.  CCG can help put together a draft response paper regarding the impacts on healthcare provision but will need to take it through internal channels.  Need for more of a strategic overview of estates planning in Bury and at GM level.
Bury Clinical Commissioning Group, Bury MBC, AA Projects	14/08/2017	Meeting	Bury Council to confirm range of housing types and, residents per unit and number of units per ward.
Cheshire East	16/10/2017	Feedback	Feedback from Stockport Issues and Options Consultation and agreement of next steps for SEMMMs refresh.
Bury Council, Greater Manchester Ecological Unit	27/10/2017	Meeting	GMSF Green Infrastructure and Ecology Issues GMEU:  The latest masterplans for Elton Reservoir, Walshaw and Northern Gateway were discussed with GMEU who gave an overview of GMEU's comments and concerns.  Elton: Masterplan broadly in line with GMEU's position.  Walshaw: Main corridors which need protection are protected.  NG1 – Whittle Brook could fulfil GI function.  Significant SuDS will be required to mitigate flood risk.

Bury Council, TfGM	09/11/2018	Meeting	Covered the main draft allocations in respect of their highways issues, namely Walshaw, Elton Reservoir and Northern Gateway. The Aimsun model could be used which would give much more detail than other models but currently does not take into account the Walshaw site. Elton and Walshaw sites will have impact on each other simultaneously. Elton: There is an opportunity to open up bus travel opportunities that currently do not exist. NG1: Potential for improved bus services and the employment provision will help support a new network.
Stockport	14/11/2017	Cabinet Committee Paper	SEMMMS Refresh Issues and Options - Update following public consultation. This report provides an update on the public consultation undertaken on the Stockport Transport Issues and Options paper as part of the first stage of the SEMMMs refresh.
Stockport, Atkins, Cheshire East Council	14/11/2017	Meeting	Update on SEMMMS progress meeting.
Bury Council, Environment Agency, United Utilities, Canal and River Trust	14/11/2017	Meeting	All of Bury's draft allocations were discussed in respect of their flood risk issues. CRT and EA noted that Elton Reservoir has been factored into their plans to carry out development options around reservoir safety in the area and a flood risk assessment respectively. The results of these may affect development capacity. CRT to hold further discussions with UU regarding Elton Reservoir. UU noted where there were capacity problems on their network and need for easements. UU to confirm where known constraints exist. All new developments should provide alternatives for drainage into the sewerage system. UU require a holistic drainage strategy to be prepared for each allocation.

Peak District, National Park and Stockport	15/11/2017	Meeting	This was a Duty to Co-operate meeting between Stockport and the Peak District National Park. Reference was made to the Greater Manchester Landscape Character Area work, A6 Corridor work, SEMMMs refresh, A6MARR, Poynton Relief Road, Macclesfield Bypass and A6 to M60 link.
Bury Council, Bury CCG, AA Projects	12/12/2017	Meeting	Council wish for the Health Service Planning note originally produced in Summer 2017 to be revisited. Bury CCG agreed that the paper needs to estimate impact on future provision and resolved to revise the paper.  AA Projects noted that needs must be estimated at the strategic level which maximizes utilisation. All agreed that the Neighbourhood Asset Review is closely linked with this work and we need to see its results.
Peak District, National Park and Stockport	19/12/2017	Meeting	Discussion focused on the SEMMMs refresh, the A6 to M60 link, Poynton Relief Road and A6 Corridor work.
Stockport, Atkins and Cheshire East	19/12/2017	Meeting	Update on SEMMMs progress meeting.
Rossendale and Bury	19/03/2018	Meeting	<ul> <li>Meeting held by Bury to discuss ongoing cross-boundary issues with regard to improving public transport connectivity for Rossendale residents to access Greater Manchester.</li> <li>Rossendale wish to run commuter trains on the East Lancs Railway which would then link up with the main National Rail line at Castleton to Manchester Victoria. Rossendale are of the view that the</li> </ul>
			proposed Northern Gateway allocation has potential to justify a freight spur from the current East Lancs Railway line, and that this would support their case to run

			commuter trains on the East Lancs Railway to Manchester Victoria via the main National Rail line at Castleton.  Bury's position is that there needs to be a convincing case for transport investment which is not currently present, there needs to be no impact on the heritage aspects of the ELR which is a popular tourist attraction and possible impacts on parking at Ramsbottom and Summerseat would need to be resolved. Rossendale will proceed with building a business case to help attract DfT funding which could fit well with the TfN 'Central Pennines' multi-modal study currently being prepared.  Bury have no plans for development at Buckley Wells which would cut possible links with the Metrolink line towards Manchester.  Rossendale will be safeguarding the line and potential park and ride station locations in its Local Plan. Bury to take account of Rossendale's safeguarding and park and ride proposals in the Bury Local Plan and to introduce designations as appropriate.
Rossendale Borough Council	6/06/2018	Meeting	Rossendale undertook a Duty to Cooperate meeting inviting various organisations including GMCA, concerning their Local Plan, which they are about to take out to consultation on the publication version at the end August 2018. The meeting related to the details of their Local Plan but they did reiterate that they could not take any of Greater Manchester's housing provision.
Warrington Borough Council, GMCA,	11/06/2018	Meeting	Discussions covered:  GMSF Update, Warrington Local Plan,

Salford City Council, Wigan Borough Council, Trafford Council, TFGM		<ul> <li>We imp</li> <li>Tra</li> <li>Re</li> <li>Sal</li> <li>Co</li> <li>Re</li> <li>We</li> <li>Up</li> </ul>	indicated that they could not take any of GM's housing provision but were not expecting GM to take any of theirs. Highways England have raised concerns about the M6/M56 Junction and cumulative impact on SRN. Modelling work has been undertaken and TFGM would like sight of this work.  Iford Local Plan - discussions around estern Cadishead and Irlam GMSF and plications for Warrington. Afford Local Plan - commencing Local Plan eview shortly lford Duty to Co-operate/ Statement of mmon Ground to be published alongside as 18 Draft Plan. Warrington, Cheshire est and Cheshire East are a pilot for DtC. Indate on GM Authorities liaison meetings the EA/NE/UU
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Table 14.2 Collaborative Activity with Neighbouring Authorities

## 14.3 Consultation Second Draft GMSF - February 2017 to March 2019 Duty to Co-operate Bodies

Date	Public Body	Actions
2017-18	Environment Agency	Weekly meetings with EA, GMCA and GBA Consulting to discuss the SFRA Level 1 study.
2017-19	Environment Agency, Natural England and United Utilities	Joint meetings were undertaken between each district and the Environment Agency, Natural England and United Utilities between 2017 and early 2018 on the emerging evidence base and concept planning for each allocation. The objective being to discuss key environmental issues and opportunities as well infrastructure requirements that has to be considered.
2017-19	Highways England	Greater Manchester Highways Strategy Board that met quarterly to discuss transport evidence including that supporting GMSF. Attendees were: TFGM, GMCA.

2017-19 High Engl	and ever	/TfGM Strategic Working Group Meeting met roughly ery 6 weeks which had GMSF as a standing item on the enda since 2017 and updates were reported every quarter the HSB.
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Table 14.3 Collaborative Activity with Duty to Co-operate Bodies

# 15 Publication Draft Greater Manchester Spatial Framework - April 2019 to December 2020

#### 15.1 GMCA Governance: Greater Manchester City Region

Date	Governance	Summary of Discussion	Actions
11/04/19	GM Housing Planning and Environment Overview and Scrutiny	The GM Housing Strategy was discussed, introduced by Paul Dennett. It was noted that having aligned strategies such as the GMSF and Housing Strategy and Infrastructure Strategy is the best place to lobby government. It was stated that the GMSF has policy that all new build houses will meet standards.	That the report be noted.
11/07/19	GM Housing Planning and Environment Overview and Scrutiny	Update on the GM Strategy Implementation Plan and Performance Dashboard, which includes the GMSF in the programme. It was stated that as part of the evidence base for the next phase of the GMSF, the GMCA are looking at strategic viability of developments.	
29/07/19	Low Carbon Hub	It was explained that the first consultation ran from 14 January to 18 March 2019 and Officers were in the process of reviewing the responses and updating the framework in light of comments. The GMCA would be provided with an update at the next meeting on 27 September 2019.	That the update be received and noted.
12/09/19	Planning & Housing Commission	An update on the GMS was provided. The Commission were advised of the process, the key issues raised during the consultation and the next steps. Members were reminded that through the 2014 Devolution Agreement the Mayor has a duty to produce a Spatial Development Strategy (SDS), building on work carried out for the GMSF. Consultation on the Revised Draft of the GMSF took place between January and March and there had been approximately 17,500 responses to the consultation on the draft plan. A Consultation Summary report will be published following the GMCA meeting on the 27 September 2019.	That the update provided be noted

13/02/20	GM Housing Planning and Environment Overview and Scrutiny	Report of Paul Dennett to provide Members with an update on progress on the GM Housing Strategy Implementation Plan, which includes the GMSF at several stages in the programme. Anne Morgan delivered a presentation on the Town Centre Challenge initiative. Regarding the GMSF, Members	That Scrutiny note and comment on the report and
24/01/20	Planning & Housing Commission	Anne Morgan, Head of Planning Strategy, GMCA provided a verbal update on the GMSF. The Commission were advised of the process, the key issues raised during the consultation and the next steps.	That the update be noted.
20/01/20	Green City Region (Low Carbon Hub)	Land being released for housing and its proximity to transport was raised as part of the Greater Manchester Spatial Framework (GMSF). It was suggested that there would be significant challenge from objectors and developers. It was advised that a strong evidence base would be critical and a public narrative was needed.	
14/11/19	GM Housing Planning and Environment Overview and Scrutiny	A report providing the latest six monthly update of the Greater Manchester Strategy (GMS) implementation plan and performance dashboards. Officers clarified that due to not having regulations in place as a result of them not being agreed by Central Government, the next round of statutory consultation will not be until summer 2020. The commitment made as part of the GMSF housing vision to build 50 000 homes, within which 30,000 being for social rent was highlighted.	That the report be noted and the Committee's comments be taken into account with this ongoing work.
18/10/19	Green City Region (Low Carbon Hub)	A report was considered that provided the usual update on progress of the GM Green City Region Partnership for the second quarter of 2019/20. It was confirmed that the impacts of new housing standards had been considered in terms of the Greater Manchester's Plan for Homes, Jobs and the Environment. Quality assurance processes should take account of building regulations for new build. A small plot of eco houses would be built in Bury to show there was an alternative to regular builds.	
27/09/19	GMCA	A report to update the GMCA on the consultation on the 2019 Revised Draft of the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF). The Summary of Consultation Responses to the Revised Draft 2019 and the proposed timetable for the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF) publication was approved.	

		commented that they would welcome any GMCA guidance in projecting town centre development and how to support development of cultural centres.	request further updates as appropriate.
24/07/20	Green City Region (Low Carbon Hub)	The Environment Agency provided a short summary and presentation of the research undertaken by Currie & Brown/Centre for Sustainable Energy in support of the draft GMSF Policy for all new developments to achieve net zero carbon by 2028. A Member enquired about the link to the UK Green Building Council and asked if houses were being built on LA land, building contractors must achieve the 19% baseline for net zero carbon. In response, it was noted that there was already a number of local plans that exceeded building regulations; the GMSF would set the overall approach and bring consistency across Greater Manchester.	That report be noted.
29/07/20	GM Housing Planning and Environment Overview and Scrutiny	Report of Paul Dennett to update members on the progress and the proposed timeline of the GMSF. Members heard that the revised timetable aimed for an 8- week consultation period commencing in November 2020. The submission of the GMSF Plan to the Security of State for examination was scheduled for June 2021, with the adoption of the GMSF Plan aimed for 2022. Members highlighted concerns around conducting a consultation in November-December, with uncertainty around Covid lock-down restrictions and this period leading to Christmas noted as a potential challenge.	Review the report.  Suggest any recommendators to AGMA Executive Board prior to consideration
31/07/20	AGMA Executive Board	A report to update members on the progress of the Greater Manchester Spatial Framework and request AGMA Executive Board to agree the proposed timeline.	
09/10/20	GM Housing Planning and Environment Overview and Scrutiny	Report of Simon Warburton, to set out the 2040 Transport Strategy documents that were proposed for endorsement and approval through meetings in October. An updated, draft Delivery Plan was published for consultation – alongside the first version of the GMSF - in January 2019. A final version of this document was prepared for GMCA approval. The Five-Year Delivery Plan set out the practical actions planned, over the next 5 years, to deliver the 2040 Transport Strategy and achieve the transport ambitions of the GMCA and the Mayor, in parallel with the development of the GMSF.	

11/12/20	AGMA Executive Board	A report to update members on the progress of Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework Publication Plan 2020 and outline proposed next steps. The AGMA Executive Board	
11/12/20	Planning & Housing Commission	Anne Morgan, Head of Planning Strategy, GMCA provided members with an overview of the GMSF and a report was considered. She brought the meeting up to date following the recent decision by Stockport Council not to participate further with the Joint Plan, but to withdraw to prepare its own Local Plan. Notwithstanding the decision of Stockport Council the rationale for the preparation of a Joint Development Plan Document ('joint plan') remained. There remained a strong shared belief that a joint approach remained crucial to managing growth and development in a planned and sustainable way, and as an important element of Covid recovery.	That the decisions of the AGMA Leaders as now reported be supported.
10/12/20	Green City Region (Low Carbon Hub)	The Chair updated Members on Greater Manchester Spatial Framework (GMSF) progress and the issues surrounding Stockport Council's decision not to endorse it.	Members would be kept updated at future meetings.
04/12/20	Stockport Cabinet	Subsequently, Stockport cabinet resolved not to approve publication draft GMSF.	
03/12/20	Stockport Council	Stockport full council resolved not to approve the publication draft GMSF for submission.	
12/11/20	GM Housing Planning and Environment Overview and Scrutiny	The GM Mayor Andy Burnham provided a verbal update on the ongoing Covid-19 pandemic, and GM's response. In terms of building back better, GM was pressing on with its big picture plans, which included the final version of the revised GMSF. The Plan was currently being considered by districts after AGMA unanimously agreed on 30 October 2020 to recommend to districts that the GMSF Publication Plan be approved for consultation and submission.	That the update be noted.
30/10/20	AGMA Executive Board	A report to update members on the progress of Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework Publication Plan 2020. The districts were requested to approve Publication of the GMSF: Publication Plan 2020 and Submission of the GMSF 2020: Publication Plan.	

was recommended to agree in principle to the preparation of a Joint Development Plan Document of the nine authorities and to establish a joint committee.	
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Table 15.1 Collaborative Activity with GMCA Governance

## 15.2 Neighbouring Authorities Bordering Greater Manchester City Region

Date	Neighbouring Authority	Attendees	Summary
21/03/19	St Helens		GM Mayor Andy Burnham letter made comments to St Helens Borough Local Plan 2020-25.
28/03/19	Blackburn with Darwen		GMCA, Bury and Bolton response to Blackburn with Darwen Local Plan: Issues and Options Consultation.
01/04/19	All		Email from GMCA to all Neighbouring Authorities: "We would like to know, on behalf of the ten GM local planning authorities, if your district position has changed since we last asked you (in 2018) and whether you consider there is any potential for your district to accommodate any of Greater Manchester's growth, and if so, whether this is either housing, employment or both."
02/04/20	Kirklees		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
06/04/20	St Helens		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
09/04/20	Warrington		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
21/04/20	High Peak		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.

22/04/20	Chorley		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
23/04/20	Calderdale		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
24/04/20	Cheshire East		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
15/05/20	Blackburn with Darwen		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
22/05/20	Rossendale		Email responding to GMCA's ask to accommodate any of GM's growth: Unable to accommodate additional housing and employment need.
28/05/20	Peak District National Park	Oldham, GMCA	The meeting was focused on discussing the issues that were raised in the PDNP's comments to the Revised Draft GMSF consultation 2019, specifically the Robert Fletchers allocation, green belt and HRA.
04/09/20	Peak District National Park	GMCA, MCC, TFGM, Stockport, Oldham and Tameside	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: Locality Assessments and worst case scenario modelling; cycling and walking initiatives; Robert Fletchers site.
07/09/20	Blackburn with Darwen	GMCA, MCC, TFGM, Bury, Bolton	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: details of evidence base; employment and housing allocations; Statement of Common

			Ground; Planning White Paper implications for the GMSF; Covid-19 impact; Blackburn evidence base.
08/09/20	West Yorkshire CA, Calderdale, Kirklees	GMCA, MCC, TFGM, Oldham and Rochdale	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: GM housing and employment growth; Kirklees local plan; Calderdale local plan; ecological discussion; carbon neutral; Covid-19; West Yorkshire Statement of Common Ground; GMSF Statement of Common Ground.
10/09/20	Derbyshire CC and High Peak	GMCA, MCC, TFGM, Oldham, Stockport, Tameside	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: local housing need methodology; Tameside local housing need; Statement of Common Ground; transport modelling; SEMMMS; Transport Delivery Plan.
11/09/20	Cheshire East	GMCA, MCC, TFGM, Stockport, Trafford	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: GMSF published as a development plan document; minerals apportionment; Transport Delivery Plan; SEM multi-model strategy.
14/09/20	Liverpool City Region CA and St Helens	GMCA, MCC, TFGM, Wigan	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: Wigan GMSF allocations; Wigan transport strategy; east Lancashire road corridor A580; station asks across GM; Statement of Common Ground; Planning White Paper.

15/09/20	Warrington	GMCA, MCC, TFGM, Salford, Trafford, Wigan	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: Salford GMSF allocation; TFGM work; Statement of Common Ground; local housing need and planning white paper; Salford local plan; Covid-19; HS2 and Pocket Nook; Warrington local plan.
16/09/20	Chorley, Lancashire CC, Burnley, Rossendale and West Lancashire	GMCA, MCC, TFGM, Bury, Rochdale, Wigan	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply and updates to the 2040 Transport Strategy and final 5-Year Delivery Plan. This issues discussed were: housing and employment growth in GM; tram-train in GMSF Transport Plan; GMSF background evidence; Rossendale cross-boundary opportunities; Skelmersdale rail link; Manchester north-west quadrant rail study; Lancashire strategy.
16/09/20	West Lancashire		West Lancashire confirmed in the Duty to Co-Operate meeting 16/09 with a formal answer that they were unable to accommodate additional housing and employment need, in response to GMCA's ask to accommodate any of GM's growth.

Table 15.2 Collaborative Activity with Neighbouring Authorities

#### 15.3 Duty to Co-operate Transport Meetings

15.1 In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA and neighbouring authorities with the focus being the transport evidence. Following each meeting a Proforma of the meeting minutes and outcomes was shared with attendees and an extract from each of these is set out below.

Blackburn with Darwen	Blackburn with Darwen
Issue	Comment

Details of evidence base	BwD noted that the details of the evidence need to be assessed before questions could be asked about strategic issues of cross boundary importance.
Employment and housing allocations	BwD to take evidence on board and come back to the CA with comments after a review of the evidence.
Statement of Common Ground signature preference	The appropriate level for the signature will depend on whether the issue is deemed as controversial, so the decision should be based on how important the issue is to the respective council.
Planning white paper implications for the GMSF	Following the government consultation, the new planning system would not be in place by the time of GMSF submission due to time taken to pass legislation.
	Immediate consultation on Local Housing Need could cause issue for the GMSF, as the new method could come into force quickly by early 2021. This would give the CA 6 months before submitting the plan. The new LHN method causes distribution changes, Manchester loses whilst Rochdale gains, and affects the GMSF strategy.
Covid-19 impact	There will be significant short-term impacts, but it is difficult to understand the long-term impacts and measure whether the GMSF strategy over the plan period will be affected. There is not yet evidence for less growth in the city centre.
Blackburn evidence base	Economic evidence base to be refreshed.  It is too early to understand how new working arrangements will settle, therefore affecting the ability to carry out a transport assessment.

Table 15.3 Blackburn with Darwen Meeting

Cheshire East	Cheshire East
Issue	Comments

GMSF published as a Development Plan Document	Previously it was Greater Manchester's intention was to publish the final draft GMSF and pre-submission plan as a mayoral SDS, but the regulations that needed changing have not been laid. In order to progress with the desired content of the plan and timetable, Greater Manchester must stick to publishing the plan as a DPD. There is little difference between the two concerning the relations with neighbouring authorities.
Mineral apportionment	The mineral and waste plan is not being updated, so it is the same policy position as stated in 2019. As detailed in the GMSF Greater Manchester will monitor this issue over the coming years. Although the minerals' issue was not flagged by Cheshire East in response to the 2019 consultation, they are now considering revising their minerals' local plan. Cheshire East commented that GM has concentrated growth within the urban area so as to minimise greenfield and Green Belt release, however as GM is an extensive urban area, it cannot consume its own minerals.
Delivery Plan	Cheshire East asked how the Transport for Greater Manchester Delivery Plan relates to the delivery plan for Transport for the North. They are different models for travel growth scenarios. The TfGM delivery plan is about local routes, based in GM and neighbouring authorities, with a city-to-city theme. TfN is about conurbation to conurbation across the north. It was also confirmed that the investment plans are consistent.
South East Manchester Multi-Modal (SEMMM) Strategy	Cheshire East raised concerns that the strategy was produced two years ago on a different set of modelling, so may not want to endorse the SEMMM strategy. In response, the issue is recognised as a local issue, not a GM wide strategy. The strategy is also still consistent with early assumptions about overall growth and the assumptions have not changed for public transport and highways. Cheshire East requested an ongoing refresh of the strategy.

Table 15.4 Cheshire East Meeting

Lancashire County Council, Chorley, Rossendale, West Lancashire Issue	Lancashire County Council, Chorley, Rossendale, West Lancashire Comments
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Greater Manchester housing and employment growth	West Lancashire have responded to the GM ask if neighbouring authorities can accommodate any GM housing or employment growth with a formal answer confirming that they cannot.
Tram-train in GMSF Transport Plan	Rossendale's response raised the issue of the proposed tram-train in the GMSF Transport Plan, from Rochdale-Heywood-Bury and the fact that this was being developed in isolation of Rossendale's aspirations. This potentially would cut off a future direct rail link from Rawtenstall to Manchester Victoria using the Calder Valley Line.
GMSF background evidence	Neighbouring authorities will spend time to digest the background evidence once published, as there will be a lot of information.
Rossendale cross-boundary opportunities	Comments raised about whether the linkages between the Northern Gateway site and Rossendale have been recognised in terms of commuter flows, including along the M66. There is a strong connection with the NG site for employment opportunities: new residents in the area will commute to work in Rossendale and residents in Rossendale will want to go to the NG area to work. It is important to improve the rail commuter route from Rossendale into GM. TfGM recognise this and will work more closely with Rossendale around the transport connections including the proposed tram-train to Bury.
Skelmersdale rail link	There is opportunity to connect Skelmersdale into the rail network. This would involve diverting the existing Wigan-Kirby service into, and terminating at, Skelmersdale and extending the Liverpool-Kirby Merseyrail service to Skelmersdale, with new track alignments in to Skelmersdale. It would provide a town centre station and a 'y' shaped arrangement connection to Liverpool and Wigan. Lancashire CC is working on this as priority. A significant part of the business case is the connection into GM, as the town is just outside Wigan Borough.
Manchester North-West Quadrant rail study	Lancashire County Council agreed to contribute towards the North-West quadrant rail study. The study area has been extended, going out to Blackpool and reaches Lancaster & Morecambe. There is concern that GM growth near the Chorley corridor could have a significant increase on railway demand, with new trains being over-capacity.
Lancashire strategy	Lancashire County Council looking at a long-term strategy, to 2045, with proposals to move towards a Mayoral CA structure at an early stage. This would grant transport authority. An interim plan to cover the next five years could be required.

Table 15.5 Lancashire CC, Chorley, Rossendale and West Lancashire Meeting

Derbyshire County Council, High Peak Issue	Derbyshire County Council, High Peak  Comments
Local housing need methodology	The new methodology does not make a notable difference to the overall figure for GM, however Manchester's figure is reduced significantly and Rochdale's figures is increased significantly. The figure for Stockport is reduced fractionally. Concern was raised if there is a redistribution for Stockport and Tameside; it may increase demand in the housing market in High Peak and increase commuting into Greater Manchester. This would increase use of cross boundary transport infrastructure such as the A6, A57, Buxton-Manchester and Glossop-Manchester railway lines.
Tameside LHN	The new methodology increases Tameside's local housing need by approximately 100 units.
Statement of Common Ground	A question was asked about whether the intention will be to send out a series of Statements of Common Ground between different authorities or to coordinate collectively. A standard one will be sent out to all, which will outline what activities have been undertaken, summarise the issues and recommendations and discuss how the GMSF has been amended to meet these requirements. If there are additional issues to be resolved with a particular authority, further conversation on the specific issue will take place. This may result in an independent Statement on Common Ground for the authority.
Derbyshire and High Peak	Derbyshire and High Peak councils agreed to sign a joint Statement of Common Ground, in order to keep the process simple.
Transport modelling	The transport modelling by Transport for Greater Manchester is a piece of work based on worst-case scenario modelling, using assumptions around commuting patterns in neighbouring areas. It is a strategic model that looks at generalised growth, not a detailed route-by-route analysis or corridor specific.
SEMMMS	Discussion around traffic growth on A6 and SEMMMS implementation and acknowledgment that Stockport, Cheshire East and High Peak to consider further.

Transport Delivery Plan	The Delivery Plan discusses both short and long-term priorities and integrates place based thinking. The majority of stations remain in the plan.
Duty to Cooperate process	Comments from Derbyshire CC that the plan and the process for commenting on it are well structured; Derbyshire looking forward for the opportunity to view and comment on more detail.

Table 15.6 Derbyshire CC and High Peak Meeting

West Yorshire Combined Authority, Calderdale, Kirklees	West Yorkshire Combined Authority, Calderdale, Kirklees  Comments
Issue	
GM housing and employment growth	Confirmation that Kirklees and Calderdale are unable to accommodate any of Greater Manchester's housing or employment growth. Recognition that GM plan is more complex and much larger.
Kirklees local plan	Consideration should be given to the impact of the GMSF proposals on the road links (including A/B roads) between the Oldham district and Kirklees district including potential increases in traffic and any air quality implications in this area.  Regarding the site-specific heritage impact assessments, in the Kirklees examination, significant weight was given to impacts on heritage assets and the content of some HIAs contested by Historic England.
Calderdale local plan	The examination affects the whole trajectory of the plan: it was submitted in January 2019 and the stage two hearings are taking place in October/November of this year (2020). Green Belt release and exceptional circumstances is one area that the inspectorate is looking at in the examination.
Further ecological discussions	Natural England are not satisfied with the issue of nitrogen, so there will be further ecological discussions. The outcome of this can be shared with GMCA.

Carbon-neutral: Calderdale, Kirklees	Kirklees and Calderdale Councils have both declared a climate emergency. Friends of the Earth are challenging Calderdale on the issue of carbon. There is no carbon-neutral target in the plan; the Planning Inspector for the Kirklees Local Plan did not request a modification to include a target.
	The new planning white paper may come into force before the end of the process and include a requirement for a target that may affect all local plans.
Approach to Covid-19	Calderdale to circulate a link from the examination library regarding Calderdale's approach to the Covid-19 pandemic.
Carbon-neutral: West Yorkshire	West Yorkshire have done work on carbon pathways and published a report about scenarios for reaching carbon-neutral. WYCA circulated a link:  http://www.est.ofscaput/meb/277/vest/ofsticatonenisioned.torpetwasetricaleputch/7/pdf GMCA to share a link to a similar report, regarding the 2038 carbon-neutral target.
West Yorkshire Statement of Common Ground	West Yorkshire authorities agreed to meet their own housing and employment need. The Statement of Common Ground has been published, so it can be viewed by GMCA for Duty to Cooperate purposes.
GMSF Statement of Common Ground	Question from West Yorkshire about how to provide feedback for the process. The first step is to collectively sign the GMSF Statement of Common Ground once it is circulated for signature in November. West Yorkshire need to be happy with the evidence and happy that issues will be dealt with over the period of the plan. Comments and questions will follow viewing the evidence and plan. West Yorkshire Combined Authority requested to sign independently as they are a Duty to Cooperate body, so will leave it up to the local councils, Kirklees and Calderdale, to sign for themselves.

Table 15.7 West Yorkshire CA, Calderdale and Kirklees Meeting

Liverpool City Region CA, St Helens	Liverpool City Region CA, St Helens  Comments
Issue	Comments
Wigan GMSF allocations	GMSF allocation Junction 25 has been the subject of a transport assessment, with lots of engagement between Greater Manchester and Highways England. It is subject to a

	call-in inquiry by the Secretary of State. Pocket Nook's development is likely to be predominantly towards the end of the plan period, as HS2 goes through the site area. Land South of Pennington is being removed from the GMSF so will remain in the green belt. It was recognised that the traffic impact from at J25 and Pocket Nook is low in St Helens.
Wigan transport strategy	Wigan Council is looking to update the transport strategy at a local level. St Helens noted no issue with this.
East Lancashire Road corridor A580	The two city regions needs to define the role of the East Lancashire Road corridor. The East Lancashire Road corridor has a different purpose within St Helens and Wigan. It is a strategic link for the borough of Wigan and a key M6 and M60 link. Bus connectivity between the areas needs to be addressed in the update to the transport strategy, as the bus route from St Helens (Newton-le-Willows / Haydock) to Wigan (Ashton-in-Makerfield) is losing 20 minutes on journey time. Reliability and the right revenue funding needs to be achieved.
Station asks across GM	Transport for Greater Manchester is working on a study looking at the station asks across GM, for both heavy rail and Metrolink. The initial outcomes are very favourable towards a new station on the WCML at Golborne. There is strong mayoral interest for a station at Kenyon Junction on the Chat Moss Line.
Statement of Common Ground	A question was asked about what the Statement of Common Ground will include. It will cover all aspects of the framework, not just specific transport issues. A standard one will be sent out to all, which will outline what activities have been undertaken, summarise the issues and recommendations and discuss how the GMSF has been amended to meet these requirements. If there are additional issues to be resolved with a particular authority, further conversation on the specific issue will take place. This may result in an independent Statement on Common Ground for the authority.
Planning white paper	The planning white paper will change the legal process for local plans, but before it is passed into law, it is necessary for Greater Manchester to show what issues have been identified and how they have been addressed.

Table 15.8 Liverpool City Region CA and St Helens Meeting

Peak District National Park	Peak District National Park
Issues	Comments

#### Transport Modelling

PDNP are interested in looking at the evidence and relationship between the worst-case scenario and the degree to which this influences policy. Are we accepting that the locality assessment won't generate a lot of car trips, and does the legal advice say there wouldn't be a push on sustainable travel?

Legal advice encourages the right mix using 50:50 transport modes. By taking a worst-case highways view, the work aims to demonstrate that the impact of the sites isn't severe, as it also doesn't include non-committed schemes e.g. Bus reform which may add benefits. Important that the transport evidence base is taken as a whole and the Transport Topic Paper will bring all these strands together.

#### Cycling and Walking

Conscious that C&W initiatives are town centre focused and how this may influence the way people travel to the countryside, adding pressure for car borne trips to the Fletcher's Moss site.

Want to capture sustainable journeys earlier in travel process. E.g. travel straight from town centre to the national park utilising shared ticketing, command ticketing, demand responsive services.

Ideally desire a common approach for integrated transport links to national park. Finding mid-point connections e.g. Buxton, Chapel-en-le-Frith to act as transfer points from the GM centre to the peak district using smart, cross-modal ticketing.

SMBC are interested in looking for cross-boundary canal routes for C&W which cover the route up to boundary with Stockport and Tameside into Cheshire East and Derbyshire and are also looking for parallel routes to the A6 for active travel. The district is also working on off-route cycle tracks as well. Interested in Working with PDNP on cycle and walking routes crossing boundaries.

TfGM and Stockport to engage with PDNP on upcoming smart ticketing stakeholder workshops. Also referred to transfer points out to National Park and referred to Park and Ride being used to support transfer to sustainable travel options into Peak District.

Fletcher Moss Site	Happy that the Fletcher's Mill site in Oldham is still included but we have previously raised issues on design and landscape flow and the way that this connects back to Greenfield.
	How have the design principles moved on for Fletcher Moss site following these queries?
	Oldham have looked at the policy wording considering the comments made by PDNP. Some wording from the 2016 plan has been added back in and is awaiting sign off. Oldham are considering whether the greenbelt sites e.g. pods, hotels, should this be in the supporting text as aspirations. More details should come through at the masterplan stage.

Table 15.9 Peak District National Park Meeting

Warrington	Warrington
Issue	Comments
Salford GMSF allocations	Salford's 2019 allocations have remained in the 2020 plan. North of Irlam saw its boundary reduced from 2016 to 2019 and has been again as a landowner did not want their land on the north west of the site to be included.
Transport for Greater Manchester work	Modelling outputs will not be included in the locality assessment and the example provided is the format for all. TfGM is looking to do additional network analysis work on key roads that go out of GM into neighbouring authority areas.
Statement of Common Ground	It was requested that the Statement of Common Ground is sent round as soon as possible after completion, so that authorities are in a better position to have internal conversations and meet with members ahead of signing.
Local housing need and planning white paper	A question was asked about reflections on the government revision of the standard housing methodology and planning white paper. In response, there is a desire to continue with the GMSF under the current timescale and regulations, whilst the methodology is still under consideration. The overall local housing need figure is similar, with no big impact on what is currently being

	proposed. Manchester is reduced, with Rochdale gaining significantly. The GMSF will be submitted in June ahead of the deadline for transitioning to the new methodology.
Salford local plan	Salford Council have published a local plan, which returns to looking at town centres and retail policies, with a use-class assessment.
Covid-19	There has been a major short-term impact from Covid-19, but the long-term impacts are very unclear and difficult to predict and plan around. Housing numbers and delivery rates could be affected in the first five years of the plan, but with an assumption that any slowing down of delivery at the early stages will be covered later in the plan.
Warrington work	Warrington are working with TfGM colleagues about a plan for the CLC and existing infrastructure. Warrington looking at the local impact of the Pocket Nook site and the local infrastructure plan. How they reflect on cross-boundary issues will be assessed.
HS2 and Pocket Nook	The HS2 line is directly through the Pocket Nook site, which will affect the delivery. The timescale is subject to change. West of the dismantled railway will become a construction compound for HS2 until 2028-29. There are ongoing discussions about who will fund the development of the bridge over the rail line.
Warrington Local Plan	Update for the Warrington local plan: intended submission version is going to Full Council in November.

Table 15.10 Warrington Meeting

## 15.4 Duty to Co-operate Bodies

Date	Body	Actions
2019-20	Highways England	Greater Manchester Highways Strategy Board that met quarterly to discuss transport evidence including that supporting GMSF. Attendees were: TFGM, GMCA.
2019-20	Highways England	HE/TfGM Strategic Working Group Meeting met roughly every 6 weeks which had GMSF as a standing item on the agenda since 2017 and updates were reported every quarter to the HSB.

2019-20	Environment Agency	Weekly meetings with EA, GMCA and GBA Consulting to discuss the SFRA Level 2 study and future climate change impacts.
10/03/20	Natural England	Attending: GMCA, Greater Manchester Ecology Unit and Natural England. Issues discussed were: GMEU and GMCA proposed resolution to overcome Natural England's objection to the HRA on the GMSF 2019 and to inform the HRA on the GMSF 2020.
28/05/20	Historic England	Attending: GMCA and Historic England. Issues discussed were: Statement of Common Ground, GMCA, High Street HAZ, Oldham Mills Strategy, GM Textile Mill Strategy. It was agreed to set up an additional meeting for the GMCA to share Historic Environment Topic Paper, revised policy wording for Crimble Mill, Unity Mill and Land south of Hyde. Historic England agreed to share the draft Oldham Mills site strategy when available.
24/09/20	Historic England	Attending: GMCA and HE. GMCA shared the historic environment topic paper and draft policies.

Table 15.11 Collaborative Activity with Duty to Co-operate Bodies

#### 15.5 Duty to Co-Operate Bodies Responses

Detailed below are the comments made by Duty to Co-operate bodies to the Revised Draft GMSF which have informed the consideration of revisions to policy and evidence, which is now the PfE Plan. Also set out are the responses from neighbouring districts to requests to accommodate some of PfE's housing and employment need.

Duty to Co-operate Body	Issues 2019 GMSF and Housing/Employment Email
Blackburn with Darwen	<ul> <li>BwD indicated they are unable to accommodate any of PfE's housing &amp; employment growth</li> <li>Question data around commuting remaining stable between East Lancs and GM, especially with growth planned in BwD</li> <li>Concerned about impact of Clean Air Zone on BwD businesses, HGV's, buses &amp; any planning mitigation</li> <li>Buses Bill – Permitting Local Bus services which originate in BwD and future Proposals for smart ticketing</li> <li>Improved Manchester Airport rail connections from BwD/ East lancs and other rail connections into GM</li> <li>Joint approach to upgrade with A666</li> </ul>

## West Yorkshire CA, Calderdale WYCA, Kirklees & Calderdale no comment to 2019 & Kirklees **GMSF** Calderdale and Kirklees are unable to accommodate any of PfE's housing or employment growth. Derbyshire CC & High Peak BC High Peak indicated in 2020 as part of the preparation of the GMSF Publication that they are unable to accommodate any of GM's housing or employment growth. They have not responded to a recent request as part of the PfE plan preparation. Concerned about the housing figures not matching the ambitious employment growth and this leading to more pressure on neighbouring authorities to release more land for housing. High Peak SHMA highlights relationship between High Peak, Stockport & Tameside. Re-distribution in GM means Tameside and Stockport are not meeting their own need but redistributed into MCC. The higher density type of housing in the core may not be attractive to families leading to more pressure on High Peak to accommodate housing to serve growth in GM. A Green Belt Review should be undertaken to support alterations to the Green Belt in the GMSF Greater demand for housing in GM may encourage more commuting and impact A6, A57/ A628 Transport -Mottram Bypass Hope Valley line upgrade Highway improvements Tintwistle New station at Gamesley New Station High Lane Tram strain service to Glossop/Marple SEMMMS – impact of A6- M60 Relief Road on A6 Funding for transport delivery in GM is not always available in Derbyshire High Lane request that High Peak and Derbyshire CC are consulted at the point of the application

Cheshire East	<ul> <li>Cheshire East have indicated they are unable to accommodate any of PfE's housing or employment growth</li> <li>Concerned about Airport growth and impact on climate change CE visitor Strategy (Hotels at Airport City)</li> <li>GI links cross boundary – ensure joined up plans ie HS2 &amp; Airport</li> <li>Digital Policy – cross boundary considerations ie Jodrell Bank &amp; Alderley Edge</li> <li>Developer contributions cross boundary if required</li> <li>SEMMMS supported</li> <li>Raised specific comments on the following sites:</li> <li>Heald Green</li> <li>High Lane</li> <li>Stanley Green</li> <li>Woodford Aerodrome</li> <li>Manchester Airport</li> </ul>
Liverpool & St. Helen's	<ul> <li>St Helen's have indicated they are unable to accommodate any of PfE's housing or employment growth</li> <li>No comments to 2019 GMSF by St. Helen's or Liverpool</li> </ul>
Warrington	<ul> <li>Warrington have indicated they are unable to accommodate any of PfE's housing and employment growth</li> <li>No comments to 2019 GMSF by Warrington</li> </ul>
Lancashire County Council	<ul> <li>Northern Gateway – increased travel demand between GM &amp; Rossendale. M66 key to economic growth in Rossendale, further congestion due to impact of NG is a concern.</li> <li>Upgrade &amp; electrification of railway linking Manchester, Bolton &amp; Preston. Wishes to work with TfGM re growth in demand on this line to ensure there is capacity on the railway &amp; trains</li> </ul>
Chorley	Chorley indicated in 2020 as part of the preparation of the GMSF Publication that they are unable to accommodate any of GMSF's housing or employment growth. They have not responded to a recent request as part of the PfE plan preparation.

	,
	<ul> <li>Seeking reference to responses to various GMSF drafts in Statement of Common Ground</li> <li>Seeking reference to Gypsy, Traveller &amp; Travelling Showpeople needs. How does provision of transit sites fit into GMSF. GMGTAA 2014 is now dated. Inadequate provision in Wigan &amp; Bolton impacting on Chorley</li> </ul>
Rossendale	<ul> <li>Rossendale indicated in 2020 as part of the preparation of the GMSF Publication that they are unable to accommodate any of GMSF's housing or employment growth. They have not responded to a recent request as part of the PfE plan preparation.</li> <li>Seeking improved access to Bury &amp; Rochdale</li> <li>A56/M66 further congestion expected due to identifying Pilsworth for further economic development &amp; Northern Gateways</li> <li>Seeking a rail link between Rawtenstall and Manchester via Ramsbotton – Bury an Haywood, called Valley City Link.</li> <li>Feasibility Study options</li> <li>Tram-train connection with GM Metrolink at Bury/Buckley Wells or National Rail at Castleton South Junction</li> <li>GM Strategy Option Tram- train from Heywood is not supported by Rossendale</li> <li>Rossendale seeking to work with TfGM to help fund and facilitate a Strategic Outline Business Case for the whole Valley City Link</li> <li>GM Transport Plan should recognise cycle routes in GM connecting into Rossendale</li> </ul>
West Lancashire	<ul> <li>West Lancs have indicated they are unable to accommodate any of PfE's housing and employment growth</li> <li>Concerned about the housing figures not matching the ambitious employment growth and this leading to more pressure on neighbouring authorities to release more land for housing.</li> <li>GM not releasing enough Green Belt land to accommodate growth</li> </ul>
Network Rail	GM Allocation 24 Castleton Sidings

- Public Footpath may need to be diverted over the level crossing
- Collaborating with local Councils and East Lancs
  Railway on proposals to extend ELR to Castleon. There
  is a need for access by Network Rail and ELR to
  undertake maintenance/improvements

GM Allocation 26 Land North of Smithy Bridge/ Roch Valley

 Impact of development on Smith Bridge Station & Smithy Bridge Level Crossing – ensure mitigation and new infrastructure is funded by the development

GM-C5 Transport Requirements of New Development

 Network Rail will not accept any installation of new level crossings as a consequence of new development

GM 32 Irlam Railway Station

- Footpath and Cycleway & Irlam Railway Station Access for All
- Can developer contributions to improve existing facilities at the station

Policy GM – D1 Infrastructure Implementation

 Lists collaboration with key infrastructure providers but does not mention Network Rail or TfN. These should be added to the list

Seeking clarification on impact from development on stations and proposed stations and network at:

- Heald Green
- Griffin Farm Stanley Green
- Godley Green Garden Village
- South of Hyde
- Tmperley Wedge HS2
- Pocket Nook HS2
- West of Gibfield
- Study with TfGM on Tram Train corridor
- Various comments on Railways Stations
- Developer contributions towards funding rail and station improvements.

Environment Agency	Flood Risk Evidence
	Level 1 SRFA – identified the strategic allocations & sites within the existing land supply that will require application of the Exception Test.
	Level 2 SFRA – future assessments needed to show that exception test can be applied appropriately & to justify the quantum of development.
	Level 1 SRFA identified gaps in understanding of future climate change impacts. This additional work should form part of the Level 2 SFRA work
	EA sought amendments to the Green Infrastructure policy to better reflect the role it can play in managing current and future flood risk.
Natural England	NE sought to work with the GMCA to strengthen the plan to deliver stronger protection for the natural environment. They emphasised the opportunities presented by the Draft GMSF to deliver natural capital net gains in the areas of wetland habitat and enable a functioning nature recovery network.
	Key comments related to strengthening the approach to natural capital in the plan especially in reference to Green Infrastructure . Providing an improved definition of Green Infrastructure. Suggested amendments to the following policies are made : the Lowland Wetlands and Mosslands; ; Upalnds; Urban Green Space; Trees and Woodland; Green Infrastructure Opportunity Areas, Standards for a Greener Greater Manchester. The policy A Net Enhancement of Biodiversity and Geodiversity should refer to biodiversity net gain rather than enhancement of biodiversity net gain which is not in accordance with Defra's definition, this point was also made by the Environment Agency and Greater Manchester Natural Capital Group (Local Nature Partnership).
Historic England	Historic England raised concerns that the Revised Draft GMSF 2019 did not show an appreciation of the area's heritage and this should run continuously throughout the GMSF. The historic environment should be referenced as it provides opportunities to contribute to the area's growth and plays a part in improving the quality of life of residents.

	They made comments throughout the plan that the GMSF fails to recognise the the conservation or enhancement of the historic environment adequately or as a strategic priority. A reason this may be lacking is due to gaps in the evidence base underpinning the plan.
Highways England	Highways England made a number of detailed comments relating to policies and allocations which may impact on the Strategic Road Network (SRN). One of the key comments was insufficient transport evidence had been provided at this stage and this meant Highways England were unable to assess of the impact of the Plan on the SRN (and adjacent local highway links) at an individual site allocations level, or on a cumulative basis. The lack of detailed evidence meant the form, scale and location of the investment needed at the SRN in Greater Manchester as a direct consequence of the growth outlined in the Plan could not be identified.
Greater Manchester Natural Capital Group (Local Nature Partnership)	The Greater Manchester Natural Capital Group would like the Green Infrastructure opportunity mapping to be reconsidered in light of a more comprehensive Nature Recovery Network.
	The policy A Net Enhancement of Biodiversity and Geodiversity should refer to biodiversity net gain rather than enhancement of biodiversity net gain which is not in accordance with Defra's definition.
Homes England	Support the GMSF.
Manchester University Hospital NHS Foundation	The Hospital Trust would welcome some relaxation within the wording of Policy GM-STRAT 10 Manchester Airport and GM Allocation 11 Roundthorn MediPark Extension to include reference to the wider mix of uses including key worker and step down residential care.  Timperley Wedge -Seeking clarification regarding delivery options for the Metrolink Manchester Airport Line Western
	Leg Extension.
Peak District National Park	The Peak District National Park has raised concerns about the Chew Brook Vale allocation over various iterations of the joint plan largely related to the impact of this proposed development on the Peak District National Park. The PDNP are supportive of the redevelopment of the former Fletcher

	Mill but has concerns about the wider development area within the Revised GMSF 2019, including inclusion of Green Belt within the boundary, enabling development, the HRA requirement for further detailed assessment to determine if the site is functionally linked to the South Pennines SPA and expansion of the holiday lodges by 10-15
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Table 15.12 Duty to Co-operate Bodies Responses

## 16 Publication Draft Places for Everyone - January 2021 to Summer 2021

#### 16.1 GMCA Governance: Places for Everyone Plan Area

Date	Governance	Summary of Discussions	
14/01/21	GM Housing Planning and Environment Overview and Scrutiny	Report of Andy Burnham on Greater Manchester Transport Strategy 2040, Our Five-Year Delivery Plan and Local Implementation Plans. The new draft Five Year Delivery Plan was published for consultation - alongside the 2019 draft GMSF document - in January 2019. The two plans were published together, in order to reflect Greater Manchester's integrated approach to transport and land use planning. Members of the public provided feedback on the draft Delivery Plan itself - at the consultation events and by email - and on the 2019 draft GMSF chapter entitled 'A Connected Greater Manchester'. The summary report of that consultation was published in October 2019.	
04/02/21	GM Housing Planning and Environment Overview and Scrutiny	The GM Mayor Andy Burnham provided a verbal update. It was noted that a special AGMA meeting was scheduled to take place on 12 February 2021, to consider the report on Places for Everyone: A Proposed Joint Development Plan Document of Nine GM Districts.	
12/02/21	AGMA Executive Board	On 11 December 2020, following the withdrawal of Stockport Council from the production of the Greater Manchester Plan fo Jobs, Homes & the Environment, the Greater Manchester Spatial Framework, the AGMA Executive Board agreed to consider producing a joint Development Plan Document (DPD) of the nine remaining Greater Manchester (GM) districts, and asked officers to report back on the implications of this.	
23/03/21	Planning and Housing Commission	A presentation was given by Anne Morgan to update the Commission on the Places for Everyone Joint Development Plan Document of 9 GM authorities. As part of the process of	

		preparing the joint DPD, the nine districts will be required to enter into dialogue with Stockport on matters of strategic, cross boundary significance. The outcome of which will need to be set out in a "Statement of Common Ground". The first meeting of Joint Committee will be after the elections, which will decide the timetable.
20/07/21	Places for Everyone Joint Committee	A report to update members on the progress of Places for Everyone Publication Plan 2021: a Joint Development Plan Document for 9 Greater Manchester Local Authorities (Places for Everyone Publication Plan 2021). The Joint Committee was recommended to: agree that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020); note the supporting background documents; recommend districts approve the Places for Everyone Publication and Submission Plan 2021 and supporting documents; and agree the timetable for the production of the Plan.

Table 16.1 Collaborative Activity with GMCA Governance

### 16.2 Neighbouring Authorities Bordering Places for Everyone Plan Area

Date	Neighbouring Authorities	Attendees	Summary
11/03/21	Warrington		Email from Warrington seeking an update on the Places for Everyone Publication Plan for a refresh of their 2019 Economic Development Needs Assessment (ENDA).
16/04/21	Warrington		GMCA email response to Warrington's request for an update to their 2019 Economic Development Needs Assessment (EDNA). It is currently anticipated that the new "Places for Everyone" Joint Development Plan will have substantially the same effect on the remaining districts as the GMSF 2020 would have done.
17/05/21	All		Email from GMCA sent to all Neighbouring Authorities: "We would like to know, on behalf of the nine GM local planning authorities (Bolton, Bury, Manchester, Oldham, Rochdale Salford, Trafford, Tameside and Wigan) if your district position has changed since we last asked you (in 2020) and

			whether you consider there is any potential for your district to accommodate any of the Places for Everyone growth, and if so, whether this is either housing, employment or both."
17/05/21	St Helens		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
18/05/21	Cheshire East		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
19/05/21	Kirklees		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
21/05/21	Blackburn with Darwen		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
25/05/21	West Lancashire		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
28/05/21	Calderdale		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
03/06/21	Warrington		Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
06/07/21	Cheshire East	GMCA, MCC, TFGM	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply following the departure of Stockport from the Joint Planning process. This issues discussed were: co-operation between Cheshire East and GM; timetable; development; evidence base; Stockport; cross-boundary transport issues.
13/07/21	Chorley	GMCA, MCC, TFGM	A talk through the work that has been done to assess the transport impact of new allocations and the existing land supply following the departure of Stockport from the Joint Planning process. This issues discussed were: Update on PfE and timetable; transport evidence; Chorley local plan

		timetable; transport between Chorley and Bolton; railway link between Preston and Bolton/Manchester; growth options in Chorley may impact on public transport and motorway improvement options; transport strategy for Chorley will consider impact of growth options on SRN.
27/07/21	Rossendale	Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
28/07/21	High Peak	Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.
29/07/21	Chorley	Email responding to GMCA's ask to accommodate any of PFE's growth: Unable to accommodate additional housing and employment need.

Table 16.2 Collaborative Activity with Neighbouring Authorities

## 16.3 Duty to Co-operate Bodies

Date	Body	Actions
09/03/21	Historic England	Attending: GMCA and HE. Issues discussed: Changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment.
01/04/21	Natural England	Attending: GMCA, TFGM, GMEU and Natural England. Discussed: air quality assessment as part of the HRA for PfE. Outcome: GMCA and TFGM to commission an air quality assessment.
21/04/21	Historic England	HE provided GMCA with suggested amendments to the PfE Plan text.
20/05/21	Historic England	Email sent to GMCA in response to suggested PfE text amends on the historic environment. Largely welcomed and proposed the need to produce a new Statement of Common Ground.
01/07/21	Natural England	Attending: GMCA, TFGM, GMEU, Ricardo and Natural England. This was the initial result of the stage 1 screening assessment of the air quality HRA study for the PfE Plan.

Table 16.3 Collaborative Activity with Duty to Co-operate Bodies

## 16.4 Highways England



Anne Morgan Greater Manchester Combined Authority Broadhurst House, 56 Oxford Street, Manchester, M1 6EU Highways England Piccadilly Gate Store St Manchester M1 2WD

17th June 2021

Dear Anne

#### Places for Everyone Joint Development Plan Document

Highways England recognise the importance of clear, long term plans to support economic growth and protect the environment and local communities. Places for Everyone (PFE) Joint Development Plan sets out plans for new homes and employment floorspace, over the plan period. We recognise PfE provides an important opportunity for nine Local Authorities in Greater Manchester to create the conditions for inclusive economic growth, to meet housing need, and protect and enhance the natural environment, with the support of appropriate transport infrastructure investment. We support the vision set out in the Greater Manchester Transport Strategy 2040 and will continue to play our part in delivering the interventions set out in the accompanying 'Our Five-Year Delivery Plan'. Transport interventions are a key part of the supporting infrastructure required to deliver the development plans identified in PfE and we recognise the progress being made with identifying supporting transport infrastructure in the latest documentation for the Plan, which is recognised to have the same effect as it's Greater Manchester Spatial Framework precursor.

We are committed to ongoing collaboration with the GMCA, the nine Greater Manchester Local Authorities, Transport for Greater Manchester (TfGM) and partners to deliver the aspirations of both PfE and other policies and plans for the city region. We will continue to do this through the successful Memorandum of Understanding (MoU) that has been in place for the last five years with TfGM.

We believe that PfE, along with GM's proposals in the Clean Air Plan and for tackling climate change, together set a framework for sustainable growth across the region. As such, Highways England will continue to work alongside our strategic partners to better understand the implications of this growth and will continue to investigate how we can make best use of the SRN to support the economy, connect people and places, and improve our environment.

The Strategic Road Network: Planning for the future - A guide to working with Highways England on planning matters describes the approach Highways England take to engaging in the planning system and the issues we look at when considering draft planning documents and planning applications. The advice and guidance will help steer the collaborative approach. In summary, as a proactive planning partner, we commit to:

Picture 16.1 Highways England PfE Letter 17 June 21

- engage early and at all relevant stages of the preparation of local plans and development proposals.
- work openly to support appropriate development of infrastructure options.
- share evidence to support the development of consistent and robust analysis as to the likely relationship between proposed developments and the SRN, including providing access to relevant data and traffic models.
- share knowledge and experience of how the SRN interacts with local roads and on the highways-related consequences that can arise from development.
- work collaboratively with you to help you prepare strong policies and proposals that are sustainable, practical and well designed.

To this end, Highways England is working with TfGM, and the GMCA, to examine the potential impacts of the Plan on the SRN. We are expecting that the work being led by TfGM will provide the information we need to understand, and guide future investment and operational decisions required to support the effective operation of the Strategic Road Network.

Furthermore, Circular 02/2013 (The strategic road network and the delivery of sustainable development) sets out the way in which Highways England will engage with communities and the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network. This Circular is the policy of the Secretary of State for Transport in relation to the Strategic Road Network, and the policies therein must be considered in conjunction with the National Planning Policy Framework (NPPF) and other national policies and guidance when formulating development plan documents.

Yours Sincerely
REDACTED
REDACTED
Development & Planning Manager (NW)
REDACTED
REDACTED

# **16.5 Stockport Council**

Date	Attendees	Summary	Actions
27/01/21	Mia Crowther, Ben Brisbourne (TfGM), Amy Beasley (Stockport), Mark Clements (Salford), Sue Stevenson (Stockport), Stephen Heritage (Systra), Kevin Hargreaves, Greg Webster (TfGM), Lawrence Monk (TfGM), Duncan McCorquodale (Manchester), Stephen Riley (Wigan), Mark Robinson (Rochdale), Clare Taylor Russel (GMCA), Opu Anwar (Salford)	Places for Everyone, Transport Evidence Steering Group. Discussion held on agreeing an acceptable approach for the transport evidence base, including modelling, for a 'Plan of 9' for the remaining Greater Manchester local authorities. Slide pack presented summarising the further evidence anticipated required for development for progressing from a near complete draft of the GMSF in late 2020, to a "Plan of 9" in 2021.	TfGM considered alternative scenario narratives through right mix/covid scenario planning. Modelling is sufficient for current purposes. May need to consider a re-run of the strategic model to support EIP with the then appropriate ELS data. Stockport will need to commission a model run as soon as clarity is gained over spatial proposal.
11/02/21	GMCA, MCC, TFGM	The issues discussed were: how to progress Duty to co-Operate relationship; evidence base; Statement of Common Ground	
03/03/21		Letter from Stockport council asking if Places for Everyone could accommodate similar levels of Stockport's housing or employment growth to that accommodated in the publication GMSF 2020.	

29/03/21	Mia Crowther, Ben Brisbourne (TfGM), Mark Clements (Salford), Opu Anwar (Salford), Sue Stevenson (Stockport), Stephen Heritage (Systra), Kevin Hargreaves (TfGM), Duncan McCorquodale (Manchester), Nick Clarke (Wigan)Mark Robinson (Rochdale), Anne Morgan (GMCA)	Places for Everyone, Transport Evidence Steering Group. Updates provided on the transport workstream of Places for Everyone with attendance of Stockport Council.  Recent refusal of Bredbury planning application could influence transport modelling sensitivity testing within Tameside, though likely to be future appeals. GM will have Systra's opinion on the suitability of the LA by end of May and a very small window to check for major concerns. Strategic model updated to reflect Stockport change. Initial tests suggest GM-wide metrics don't change significantly. Meeting with Natural England to agree the approach before commencing with the HRA.	Tameside to agree approach with Systra through LA Review. Proposal to be shared with Stockport. Update to be provided at GM Planning Officers Group. Anne Morgan to update after meeting regarding cabinet meeting coordination discussions. TfGM to secure an update from the HS2 study in the area. Next meeting to be scheduled. Update on the topics discussed.
19/04/21		Letter sent from GMCA to Stockport in response to the 03/03 ask for PFE to accommodate some of Stockport's growth: GMCA responded by offering to discuss accommodating some of Stockport's employment provision but indicating that the position had changed with housing following the 35% uplift to Manchester's LHN.	
26/05/21	GMCA, MCC, TFGM	The issues discussed were: the timescale for PFE and Stockport local plan; evidence base; GMS and PFE Vision; PFE Spatial Strategy - Southern Competitiveness; housing; employment; SHMA; transport evidence. Outcome of the meeting: await view from Stockport on GMS and Southern Competitiveness but retain in PfE as is; ongoing discussions with Stockport on employment provision may lead to	

		new Employment targets in PfE; Stockport position on evidence may need to be considered implications on PfE once fully known.	
14/06/21	GMCA, The Mayor Andy Burnham, Paul Dennett Salford City Mayor PfE Portfolio Lead	Meeting where various cross-boundary issues were discussed including continued collaboration over preparation of PfE and Stockport local plan.	
21/06/21		Letter from PfE representative to Stockport MBC recognising that employment housing evidence was still being gathered by Stockport Council and they were not in a position to identify their unmet need. It asked that once this was available it was shared with the PfE districts so they could consider whether it was possible to accommodate any potential shortfall.	
26/07/21	GMCA, The Mayor Andy Burnham, Paul Dennett Salford City Mayor PfE Portfolio Lead	Letter sent which set out the outcome of the meeting 14th June, including the timetable of the PfE, Stockport local plan, the reset relationship between Stockport MBC and the 9 PfE districts and the commitment to continued collaboration. It also included a statement setting out the position between the 10 Greater Manchester Authorities with regard to the PfE.	

Table 16.4 Collaborative Activity with Stockport Council

### 16.5.1 Collaboration Between PfE districts and Stockport MBC

### **Transport Modelling**

- 16.1 A number of meetings were held to discuss an acceptable approach for transport modelling between an individual Stockport Local Plan and a further 'Plan of 9' for the remaining Greater Manchester local authorities.
  - Tuesday 19th January 2021
  - 27th January 2021

#### Meeting 11th February 2021 between representatives of PfE districts and Stockport MBC

Discussion centred around how the Duty to Co-operate relationship should progress, the evidence base and Stockport's as an integral part of evidence base to December 2020 and the Statement of Common Ground and how does the changed position of Stockport get reflected in the Statement of Common Ground. An outcome was to set up a meeting to discuss cross boundary issues and housing and employment provision.

# Letter from Stockport MBC to PfE Districts 3rd March 2021



Services to Place Stopford House, Piccadilly, Stockport SK1 3XE

Anne Morgan Head of Planning Strategy Greater Manchester Combined Authority Email: emma.curle@stockport.gov.uk

Phone: 0161 474 3542 Ask for: Emma Curle

3rd March 2021

By email only

Dear Anne,

#### **Duty to Cooperate**

I write in connection with the above and to provide you with an update in respect of preparation of the Stockport Local Plan.

Following Stockport's decision to withdraw from the GMSF in December we continue to progress with updating evidence in respect of our emerging local plan. Stockport remains a key part of Greater Manchester collectively driving for prosperity and sustainable growth across the City region. We will continue to cooperate and intend to utilise much of the evidence which has been jointly gathered to support the GMSF. As you are aware, we will continue to work together in respect of cross boundary and city-region wide issues such as transportation as an active participant in respect of strategic transport modelling work, Greater Manchester Transport Strategy 2040 and the associated delivery plans.

We are currently revising our LDS which we hope to be in a position to publish in the short term and will update you accordingly. In addition, we are seeking early agreement to establish which policies of the previously drafted publication GMSF we would wish to incorporate into the Stockport plan in some form.

It was previously agreed that, working together as part of Greater Manchester, as much as 30% of Stockport's Local Housing Need would be redistributed to other districts, helping to contribute towards objectives designed to rebalance the city-region's economy. I therefore write to formally ask whether this previous agreement can continue to be upheld, with redistribution of a similar proportion of Stockport's Local Housing Need being incorporated into Places for Everyone – a Joint Development Plan for Sustainable Growth.

In addition, under the GMSF some of Stockport's employment need was being redistributed across GM, and this was of particular benefit to districts in the North of the city region. It would be useful therefore to understand whether the joint plan still intends to proceed on the basis of this level of redistribution.

I would be most grateful if you could provide a response as soon as possible.

Yours sincerely

Emma Curle Strategic Head of Place Making and Planning

Picture 16.3

# Letter from PfE Districts to Stockport MBC 19th April 2021



Anne Morgan Head of Planning Strategy Greater Manchester Combined Authority

anne.morgan@greatermanchester-ca.gov.uk

Emma Curle Strategic Head of Place Making and Planning Place Management & Regeneration Stockport MBC

19 April 2021

Dear Emma,

Thank you for your letter dated 3rd March updating GMCA with regard to the Stockport Local Plan preparation. We note the publication of your Local Development Scheme (LDS) which sets out details of your plan preparation timetable.

Following your Council's decision to withdraw from the Greater Manchester Spatial Framework (GMSF) process, the remaining nine Greater Manchester authorities have agreed to progress a plan called Places for Everyone, and to establish a joint committee to oversee its preparation. Once this is in place, a timetable for the next stages of this Joint Development Plan Document will be agreed and shared with yourselves and made public.

As stated in your letter, Stockport is an integral part of the Greater Manchester through involvement with Greater Manchester organisations, such as the Combined Authority, Local Enterprise Partnership, Local Nature Partnership and TfGM. This places you in a unique position for continued collaborative work across many duty to co-operate issues between the nine remaining Greater Manchester authorities progressing Places for Everyone and Stockport MBC.

Your letter makes reference to the proposed approach in the GMSF to redistribute some of Stockport's need across Greater Manchester and a request to understand whether it is proposed to continue with this approach in Places for Everyone – a joint development plan for sustainable growth.

Whilst it is true that the GMSF proposed to redistribute some of Stockport's need across Greater Manchester, the approach to the redistribution of need was designed to benefit the whole of Greater Manchester and to meet its overall economic ambitions as established in the Greater Manchester Strategy and the Local Industrial Strategy. In light of this overall ambition and having considered the potential opportunities for economic growth across the nine districts of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, we would like to discuss the possibility of accommodating some of your employment growth to

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2037. This is in order that we can work together to achieve Greater Manchester's overall ambitions and, notwithstanding the fact that we are very likely to be reliant on releasing Green Belt land to meet our own requirements, as we were in the GMSF 2020, as the existing land supply does not match the identified need for the nine districts.

Your letter also referred to the previous agreement within the GMSF to redistribute nearly 30% of Stockport's Local Housing Need (LHN) within the other nine Greater Manchester authorities. Since the preparation of the GMSF 2020, the position has changed in relation to housing need across the nine districts. In mid-December 2020 the Government confirmed the new LHN methodology which means that Manchester's LHN now includes a 35% uplift creating a higher housing provision for the remaining Greater Manchester nine authorities to accommodate. Using the Standard Methodology for LHN (including the 35% uplift in Manchester), the housing requirement for the remaining nine districts is 164,880 new homes. Despite looking at increasing densities, repurposing our town centres and re-allocating employment land for housing thereby identifying a significant supply within the urban area, we do not consider that we are in a position to fully meet our Local Housing Needs without looking at land outside of the urban area. Having considered the opportunities for residential growth across the remaining nine districts, particularly in light of the increased LHN for Manchester City Council, which must be met within its boundary, the nine districts are no longer in a position to accommodate any of Stockport's housing growth.

As a consequence of the need to prepare a joint plan of the nine Greater Manchester districts, we are in the process of contacting all our neighbouring authorities again to explore any previously unidentified potential to meet our unmet need. In light of the changed circumstances we find ourselves in, in relation to meeting our residential need, please could you confirm whether Stockport would have capacity to accommodate any of the Places for Everyone housing growth.

Yours sincerely,

a. Morgan

Anne Morgan

Head of Planning Strategy

**Greater Manchester Combined Authority** 



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Yours sincerely,

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Letter from PfE representatives to Stockport MBC on 11th June 2021



Anne Morgan Head of Planning Strategy Greater Manchester Combined Authority

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Emma Curle Strategic Head of Place Making and Planning Place Management & Regeneration Stockport MBC

11 June 2021

Dear Emma,

Thank you for meeting with us on 26 May 2021 to discuss the progress of the Stockport Local Plan and to enable us to update you on the Places for Everyone Plan.

You will no doubt be aware of the duty to co-operate placed on plan-making authorities pursuant to s33A of the Planning and Compulsory Purchase Act 2004. This duty includes (inter alia) considering whether to agree to prepare joint local development documents. Until the decision of Stockport Council to withdraw from GMSF in December 2020, the ten Greater Manchester districts were discharging the duty to co-operate with their Greater Manchester neighbours through their involvement in the joint development plan of the ten districts.

Following the subsequent decision of the remaining nine Greater Manchester authorities to continue with the preparation of a joint DPD in March 2021, it has become necessary to satisfy the duty to co-operate with Stockport Council in an alternative way.

As the meeting on 26 May represented an early stage in our co-operation on strategic planning matters, I felt it might be helpful to set out the position so far.

As discussed we are preparing a record of that meeting which we will share with you for approval in due course.

In relation to Places for Everyone we discussed:

- The timetable for Places for Everyone, with consultation on a Regulation 19 plan anticipated in August 2021, Submission January 2022 and Examination and Adoption by 2023;
- The extent to which Stockport Council supports the thematic policies in the plan, in particular Chapter 3, The Vision and Strategic Objectives and Chapter 4, Strategy (most notably) the section on 'southern competitiveness' within this Chapter;

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 The extent to which Stockport Council supports the evidence base underpinning Places for Everyone and intends to utilise this as part of its own local plan.

In terms of the Stockport Local Plan we discussed:

- The approach to the production of the plan, with significant involvement of local residents and communities and a combination of strategic thought/bottom up approach;
- Beginning informal consultation summer 2021;
- Consultation on Regulation 18 (Issues and Options) in Autumn 2021, Regulation 19 (Publication) consultation in Winter/Spring 2022, Submission in Autumn 2022 and examination/Adoption Autumn 2023.

In terms of the actions from the meeting, you indicated that you would be able to provide a view on what parts of the PfE overall strategy Stockport Council could support. Therefore, I attach a draft of Chapters 3 and 4 which set out the PfE 2021 Vision, Strategic Objectives and the Strategy. Chapter 4, in particular outlines the approach we are proposing in relation to Greater Manchester's collective ambition of securing inclusive growth, including boosting the competitiveness of north Greater Manchester and sustaining the competitiveness of south Greater Manchester.

You also indicated that you would provide a view on the wider thematic policies and evidence base of the Places for Everyone Plan. As discussed at the meeting, officers are of the view that PfE 2021 will have substantially the same effect as the GMSF 2020 would have had on the remaining nine GM districts. Consequently, the thematic policies and strategic evidence base remains largely unchanged, since Stockport's decision to withdraw from the GMSF; the majority of the substantive changes relate to site specific matters. For reference, the draft GMSF 2020 and its evidence base is still available on the GMCA's website:

(GMSF - Publication Plan 2020 (greatermanchester-ca.gov.uk)

(Supporting documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

Given the timetable for the Places for Everyone consultation I would be grateful if you could provide any comments by **Monday 21 June 2021**.

Additionally, paragraph 11(b) of the NPPF applies a presumption in favour of sustainable development, which requires strategic policies to provide for objectively assessed needs for housing and other uses, <u>as well as any needs that cannot be met within neighbouring areas</u> (my emphasis), subject to the caveats set out in that paragraph.

As a result of participating in the joint development plan, some districts are providing for the unmet need of other districts within Greater Manchester.

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On 3 March 2021, you wrote to me to request whether the nine districts were still willing to accommodate similar levels of Stockport Council's unmet housing and employment need as in GMSF in PfE. From our discussions on 26 May 2021, it is apparent that it is too early to be able to have conclusive discussions on potential redistribution of development needs, given that the preparation of the Stockport Local Plan is at an early stage, with the call for sites consultation closing on 23 May 2021. I am not aware that you have carried out an assessment of Stockport Council's unmet needs yet. Once this assessment has been undertaken, and any potential shortfall has been identified, I would be grateful if you would share this information with me so that the districts may consider whether it is possible to meet all or some of the unmet need in PfE.

In the light of this, the districts would wish to seek to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.

To this end it would be helpful to know when you anticipate that you will be in a position to share the following information about the Stockport Local Plan:

- Vision, Strategic Objectives and spatial strategy
- Proposed scale and distribution of development to deliver that strategy
- Approach to identifying land and an assessment of the extent to which Stockport can meet its own development needs
- Identified shortfall (if any)

Once I have received this information, the nine districts will be in a position to consider to what extent PfE may be able to accommodate any of Stockport's unmet needs and the mechanisms for so doing to address this issue constructively as the two plans progress.

I appreciate that this correspondence covers a number of different issues so if it would be helpful for me to meet with you and any of your colleagues to discuss all or any part of the issues raised further, please do not hesitate to contact me.

Yours sincerely,

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Head of Planning Strategy

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Yours sincerely,

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Head of Planning Strategy

Greater Manchester Combined Authority

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16.5.2 Letter from GM Mayor and GMCA Portfolio Lead to Stockport Leader



Ref: AM

Councillor Elise Wilson Leader of Stockport Council

26 July 2021

Dear Elise,

Thank you for meeting with us on 14 June 2021. We all recognise that the position between Stockport and the remaining 9 Greater Manchester authorities has evolved from December 2020 when we were cooperating on the Greater Manchester Spatial Framework, to the more recent position where, in March 2021, the 9 remaining local authorities agreed to produce a joint plan (Places for Everyone) following the Stockport decision to withdraw from the joint plan to prepare your own local plan.

Under GMSF, the agreed spatial strategy resulted in some districts not meeting their local housing need (LHN) and some exceeding their LHN. However, no district was identified as having "unmet" needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial strategy. Significantly, the fact that Stockport were only meeting 70% of their LHN in GMSF did not equate to Stockport having 30% unmet need.

In the light of the withdrawal of Stockport Council from GMSF, it is necessary to 'reset' our Duty to Cooperate arrangements and our meeting was a very useful step in this process. We have set out our thinking around our co-operation to date which we intend to include in our Duty to Co-operate statement (attached at Appendix 1). This reflects the way in which we worked as part of GMSF but highlights the work we are currently engaged in to move forward.

As we discussed at the meeting, the 9 remaining districts wish to keep up the momentum with the joint plan and move to Publication stage as soon as possible in order to have an up-to-date plan in place by the end of 2023. On 12 July we published the papers for the Places for Everyone Joint Committee which

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BOLTON	MANCHESTER	ROCHDALE	STOCKPORT	TRAFFORD
BURY	OLDHAM	SALFORD	TAMESIDE	WIGAN

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took place on 20 July, whilst the thinking on the Stockport Local Plan is at a very early stage, with your "call for sites" exercise closing on 23 May 2021. You have set an ambitious programme in order to get an up-to-date local plan in place by 2023 and your recent report to Council indicates that you will be consulting on a draft plan in Autumn 2021. There are several further stages for Stockport to work through before any unmet need may be identified as your report outlines in paragraph 4.2.

We are of course all committed to collaboration across a range of issues as demonstrated by the recent GMCA meeting where significant further funding for the Stockport Interchange scheme was agreed to ensure that this important scheme at the heart of the Mayoral Development Corporation area will come forward. This highlights the issues that we all face with the viability of development, not only in Stockport, but across the whole of Greater Manchester, the scale of which is outlined in the viability study which we procured collectively to support GMSF.

Our officers are continuing to work together constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation across Greater Manchester, as they have over many years. Discussions are focusing on the timescales for our respective plans and as discussed at our previous meetings and in officer correspondence dated 11 June 2021 we have asked you to confirm whether your authority continues to support the spatial strategy previously set out in GMSF (and now in Places for Everyone); and also the extent to which you are intending to rely on the evidence base that was procured on behalf of all 10 districts. We understand that a response is awaited and would urge you to reply soon.

As agreed at our meeting, in addition to the work being undertaken by our respective officers, we agreed to meet regularly. We will be in touch to arrange a further meeting taking into account holiday commitments, but do not hesitate to get in touch at any time if you think a meeting would be helpful.

Andy Burnham

Mayor of Greater Manchester

Andy Bom han

Paul Dennett

City Mayor of Salford, GMCA Portfolio Lead