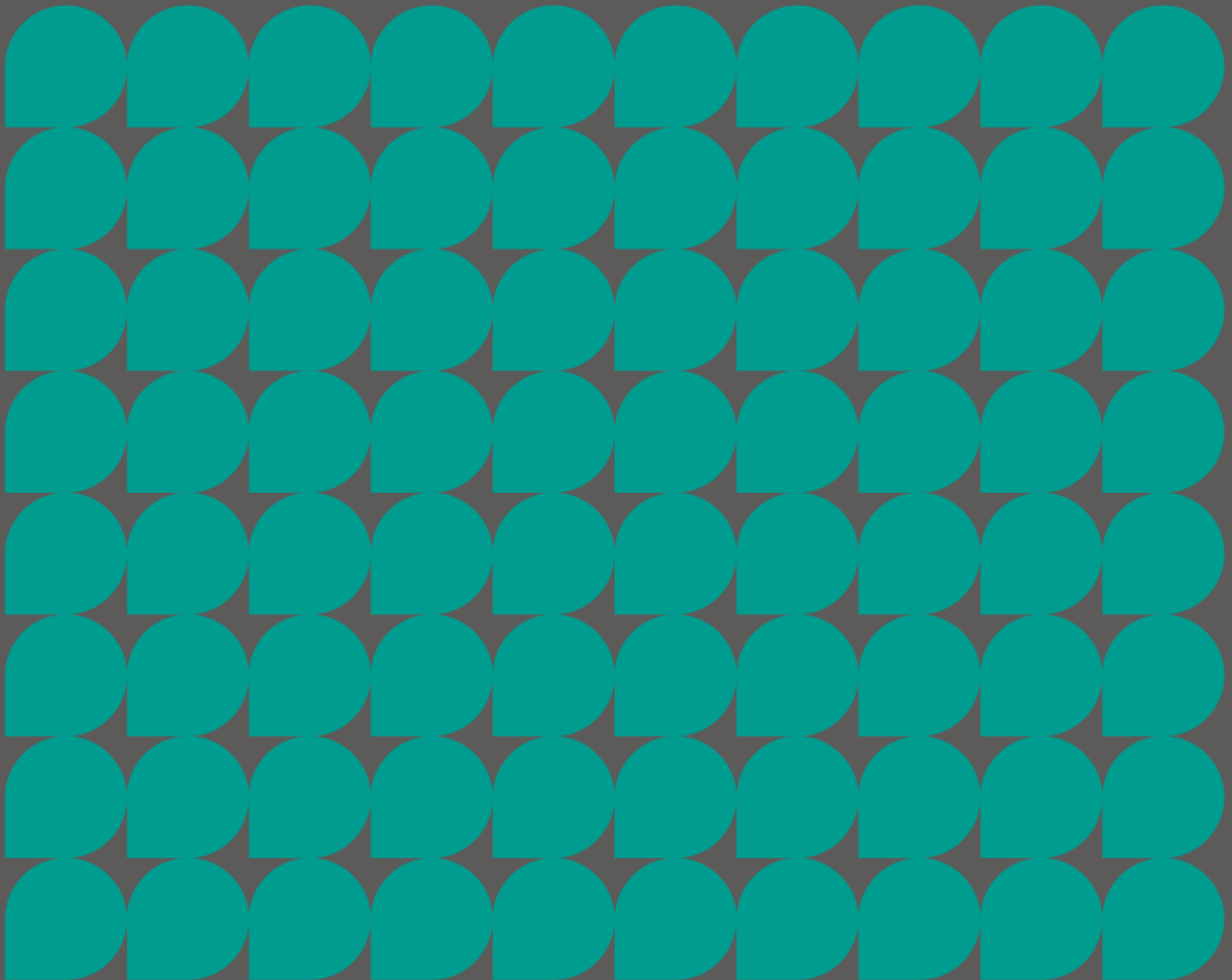


Places for Everyone

Submission Duty to Co-operate Statement
and Log of Collaboration

February 2022



Places for Everyone –
Submission Duty to Co-
operate Statement and
Log of Collaboration

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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 Plan. 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.
- 1.2 'Duty to Co-operate became a legal requirement under the provisions of the Localism Act inserted as Section 33A into the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (NPPF) refers to the Duty to Cooperate and states that local planning authorities 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 33A of the Planning and Compulsory Purchase Act 2004:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas including infrastructure that is strategic or impacts on at least two planning areas;
 - requires that councils and prescribed bodies 'engage constructively, actively and on an ongoing basis' to develop strategic policies;
 - requires plan making authorities to have regard to relevant issues raised by Duty to Co-operate bodies;
 - 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 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, including the Statement of Common Ground. The main signatories are the nine members of the Joint Committee and a signature is considered obtained through the approval of the Places for Everyone

at 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.

2.4 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. The same approach has been taken with NHS Property Services under the Infrastructure Providers Statement in the Statement of Common Ground.

Duty to Co-operate Bodies

2.5 Duty to Co-operate bodies are made up of neighbouring authorities and prescribed 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 Authority
- Rossendale Borough Council
- St. Helens Council
- Stockport Metropolitan Borough Council
- Warrington Council
- West Lancashire Borough Council
- West Yorkshire Combined Authority

Public Bodies

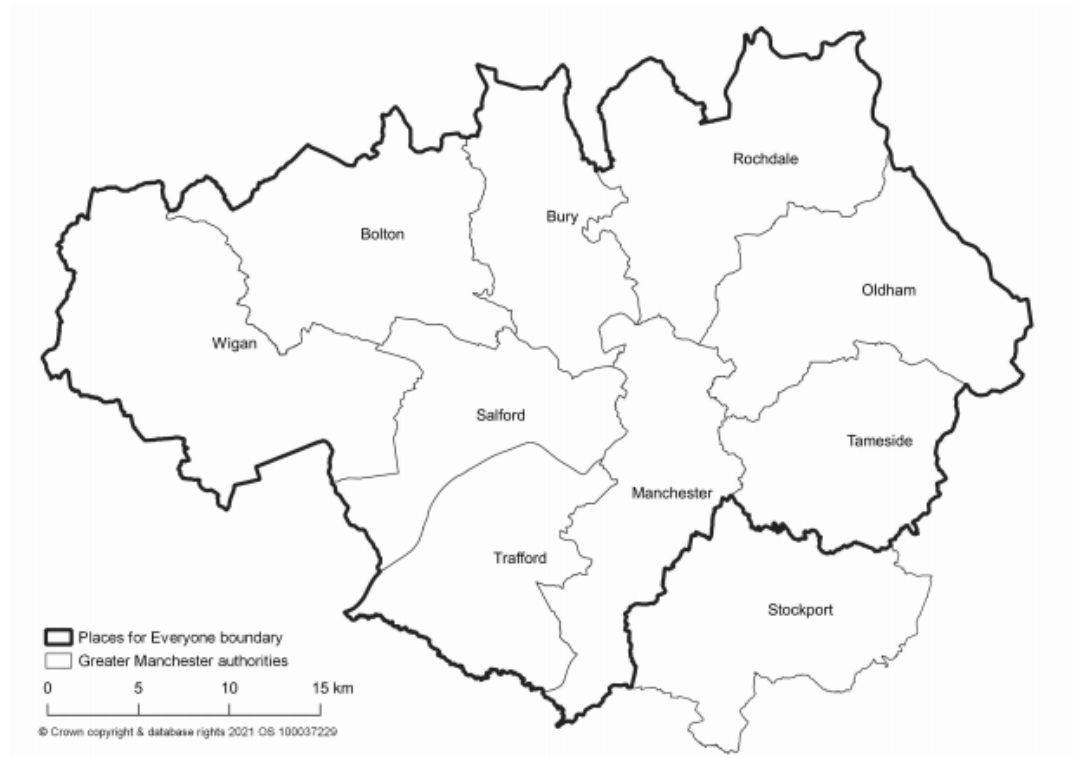
- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- Homes England
- Clinical Commissioning Groups
- National Health Service Commissioning Board
- The Office of Rail Regulation
- Transport for Greater Manchester
- Highways Authorities
- Highways England
- Local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



Greater Manchester and PfE districts Map

- 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 with regard to flooding.

4 Collaboration

- 4.1** From the early evidence gathering stages the PfE districts 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: [Home - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](https://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.
- 4.6 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 stages of 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. National Highways expressed very serious concern, at one point, regarding the lack of evidence to consider the impact on the SRN.

- 4.8 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. Whilst most of our neighbouring authorities are satisfied with the information provided on impact from growth on the highway and wider transport network, outstanding concerns still remain for National Highways.
- 4.9 Ongoing work to enhance the transport evidence base in the form of an additional TfGM study, known as the 'Highways England Future Work Programme' should provide the additional evidence required by National Highways.
- 4.10 The Statement 11 Connected Places in the SoCG relating to National Highways was revised and agreed through a collaborative process enabling National Highways to sign the Statement of Common Ground.

Green Belt

- 4.11 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

- 4.12 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 Environment Agency also provided technical flood risk advice for the GM Level 2 Strategic Flood Risk Assessment on some proposed allocations over 2019 and 2020.

Heritage

- 4.13 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.

- 4.14** 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. Historic England have sought further changes to the PfE to better reflect the historic environment within the plan. These are being given consideration and will be addressed through the normal process of the examination.
- 4.15** In their letter dated 27th January 2022, they confirmed that the GMCA (on behalf of the nine districts) has fulfilled its legal obligations under the Duty to Co-operate and it is not objecting on this point. However, they again confirmed their position that they are unable to sign the Statement of Common Ground, the reasons given for not signing relate to the outstanding policy issues which they consider must be addressed before Places for Everyone Plan can be found sound.

Natural Environment

- 4.16** Natural England made a number of comments centred around green infrastructure, related to definitions, biodiversity net 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. Work is ongoing with Natural England to address outstanding concerns in relation to the Habitat Regulation Assessment, comprising:
- Assessing the 'in combination effect' on air quality from the PfE with Warrington Borough Council's Local Plan for the Manchester Mosses SAC;
 - Assessing air quality impact on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA from the A57, A672 and A6024;
 - Assessing air quality impact on the Rochdale Canal SAC.
 - Assessing recreation impacts on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA.
 - Securing mitigation measures in agreement with Natural England to alleviate adverse impacts on protected sites if the outcome of the assessments, noted in the bullet points above, indicate that mitigation is required.
 - Liaising with United Utilities to confirm that wastewater can be managed effectively to ensure that there will be no adverse impact on the Mersey Estuary SPA.

Stockport

- 4.17** 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 underpins 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.
- 4.18** 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.
- 4.19** Meetings 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.
- 4.20** 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 Preferred Options Autumn/Summer 2022, Publication Summer/Autumn 2023, Submission Winter 2023 and Adoption Autumn 2024. The PfE timetable is Submission February 2022 and Adoption 2023.
- 4.21** 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

- 4.22** 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:
- Section 12: Formative Proposals for a Greater Manchester Spatial Framework (March 2013 to November 2014)
 - Section 13: Vision, Objectives and Strategic Growth Options for the Greater Manchester Spatial Framework (December 2014 to January 2016)
 - Section 14: Draft of the Greater Manchester Spatial Framework (February 2016 to January 2017)
 - Section 15: Greater Manchester's Plan for Homes, Jobs and the Environment Revised Draft of the Greater Manchester Spatial Framework (February 2017 to March 2019)

- Section 16: Greater Manchester's Plan for Homes, Jobs and the Environment Publication Draft of the Greater Manchester Spatial Framework (April 2019 to December 2020)
- Section 17: Publication Places for Everyone Publication (January 2021 to July 2021)
- Section 18: Submission Places for Everyone - (August 2021 to February 2022)

4.23 A summary of activity is provided in the following sections.

5 Formative Proposals for a Greater Manchester Spatial Framework

- 5.1** This section of the Duty to Co-operate Statement should be read along side Section 12 of the Log of Collaboration below relating to the same period of Plan preparation.
- 5.2** The formative proposals for the GMSF were determined during this stage and the following key activities took place:
- AGMA Executive agreed to the initial Consultation on the Objectively Assessed Development Needs and to prepare a statutory joint development plan document for Greater Manchester 29th August 2014.
 - Initial Consultation on the Objectively Assessed Development Needs was undertaken ending on 7th November 2014
 - In November 2014, each of the ten GM Authorities agreed to delegated authority to AGMA to prepare the GMSF through the Joint AGMA Committee (this subsequently became the Joint GMCA/AGMA Committee).
- 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.
- 5.4** This initial communication was followed by a series of meetings with Blackburn with Darwen, Calderdale, Chorley, High Peak, Kirklees, Liverpool, Rossendale, Warrington and West Lancashire. 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.
- 5.5** 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
- 5.6** 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 of GM.

- 5.7** Warrington raised the issue of logistics within the Atlantic Gateway covering the area along the M62 through to Port Liverpool.
- 5.8** High Peak raised concerns about the impact of growth on commuting patterns and transport routes from High Peak to Greater Manchester.
- 5.9** Lancashire County Council raised concern about the possible impact of growth on flood risk.
- 5.10** Natural England referred to a project identifying ecosystem services and pinch points across GM which should be considered in the plan.
- 5.11** AGMA/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 section of the Duty to Co-operate Statement should be read along site Section 13 of the Log of Collaboration below relating to the same period of Plan preparation.
- 6.2** Following the agreement in November 2014, at the Joint GMCA/ AGMA Committee to prepare jointly the GMSF as a joint development plan document, each of the Greater Manchester districts delegated authority to the AGMA Executive to prepare the plan, with district approval of the Plan at full Council.
- 6.3** 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

Table 6.1

- 6.4** Following the above, the Vision, Strategy and Strategic Growth Option stage was approved by Joint GMCA/AGMA Executive Board on 30 October 2015.
- 6.5** AGMA/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.

- 6.6** 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.
- 6.7** The GMCA held a series of meeting with its neighbouring authorities providing an update on GMSF, evidence (including SHMA and Green Belt) 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.
- 6.8** 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
 - West Lancashire raised the prospect of a rail link to Skelmersdale off the Wigan-Kirby Line.

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

- 7.1 This section of the Duty to Co-operate Statement should be read along side Section 14 of the Log of Collaboration below relating to the same period of Plan preparation.
- 7.2 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.
- 7.3 GMCA sent an email to neighbouring duty to co-operate 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. It also invite comments on the Green Belt Assessment and comments received were discussed with the steering group and incorporated as appropriate. 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 were awaiting further evidence, including the Greater Manchester Green Belt Review, before deciding whether they could accommodate any of Greater Manchester's housing requirement.
- 7.4 During this period meetings took place with the following neighbouring duty to co-operate authorities: Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Kirklees, Rossendale, St Helens, Warrington, West Lancashire. Matters discussed related to transport, economic growth, logistics, housing, migration, evidence - SHMA and Gypsy Travellers Accommodation Assessment. Transport matters raised included the Lancashire M66/A56 Study published and requiring TfGM liaison (Rossendale), SEMMMs (Cheshire East and High Peak), A627 Mottram By-pass (High Peak), commuting impact (Blackburn with Darwen).
- 7.5 During the consultation the following key duty to co-operate comments were received:
- Cheshire East sought stronger wording on transport and linkages and specifically in relation to Transport 2040 and the SEMMMs refresh. They are 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, this includes sustainable modes of cross boundary commuting. They also made comments on a number of proposed allocations.
 - Chorley raised concerns about how Gypsies, Travellers and Travelling Showpeople transit site provision is being considered in the GMSF.
 - 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. Warrington

would like the opportunity to discuss the proposed Western Cadishead and Irlam Strategic Site with Salford.

- 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.
- Blackburn with Darwen are seeking support for a joint approach with Greater Manchester to establish commuting assumptions to feed into housing requirements modelling work.
- High Peak sought a comprehensive Green Belt Review, plus wished to continue working with GM authorities regarding transport connections, including involvement in SEMMMS refresh.
- West Lancashire sought reference to connections to/from surrounding areas in the Accessibility policy to ensure policy support for the Skelmersdale Rail Link.
- Peak District National Park Authority raised concerns about the impact of development of the Fletcher Mill proposal on the National Park.
- Historic England believe 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. Detailed comments submitted to the whole Plan.
- Natural England wish to see a stronger link between integrated networks of high quality green infrastructure identified as priorities in the GMSF. They made detailed comments on many policies and they also make comments on the Habitat Regulations Assessment and Integrated Assessment.
- Salford Clinical Commissioning Group made comments relating to air quality and achieving greater social value from economic growth.
- Additional issues raised at the formal consultation stage are set out in Section 14.3 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 section of the Duty to Co-operate Statement should be read along site Section 15 of the Log of Collaboration below relating to the same period of Plan preparation.
- 8.2** This stage was approved by Joint GMCA/AGMA Executive on 11th January 2019. AGMA/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.
- 8.3** During this period meetings took place with Bury Clinical Commissioning Group, Cheshire East, Derbyshire County Council, High Peak, Peak District National Park Authority, Rossendale, St Helens, Warrington and West Lancashire. Content of these meetings included local plan updates from neighbouring authorities as well as GMSF updates, Northern Gateway Masterplan, the evidence base - SHMA, impact of increased commuting into GM, SEMMMs, M6 Junction 23 study, Greater Manchester Landscape Character Area work, various studies and proposals linked to the A6, the East Lancashire Railway and the M6/M56 Junction and cumulative impact on SRN.
- 8.4** 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.
- 8.5** In Spring 2018, TfGM reported that they have been developing a GMSF Transport Study to enhance 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 identify the broad transport interventions that are likely to be required to address these issues and support the planned growth.
- 8.6** 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.

- 8.7 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 traffic from employment sites.
- 8.8 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.
- 8.9 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.
- 8.10 Additional issues raised at the formal consultation stage are set out in Section 15 in the Log of Collaboration.

Statement of Common Ground Event January 2019

- 8.11 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, clarifying or raising concerns about the revised draft GMSF. The event was organized in 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.
- 8.12 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

- 8.13 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.

- 8.14** 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.
- 8.15** 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.
- 8.16** 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 seek 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.
- 8.17** 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.
- 8.18** 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 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.

- 8.19** 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.

Summary of Comments Received to the Revised Draft GMSF:

- Blackburn with Darwin raised a number of transport issues including those relating to commuting, the impact of the Clear Air Zone, the Buses Bill and Manchester Airport rail connections and the A666.
- Derbyshire County Council and High Peak Borough Council raised a number of concerns relating to growth in Greater Manchester placing more demand on High Peak to accommodate additional housing and the impact of this on the transport network.
- Cheshire East have raised concerns about public transport accessibility and potential congestion impacting their ability to access opportunities afforded by airport growth and the proposed HS2 station at the Airport. They wish to see improved access to Manchester Airport particularly from the south.
- Lancashire County Council and Rossendale raised concerns about the Northern Gateway generating increased travel demand on the A56/M66. Rossendale are seeking a rail link between Rawtenstall and Manchester via Ramsbottom – Bury and Haywood, called Valley CityLink. Also referred to was the upgrade and electrification of railway linking Manchester, Bolton & Preston and the wish to work with TfGM regarding growth in demand on this line.
- Chorley are seeking reference to Gypsy, Traveller and Travelling Show People needs.
- West Lancashire are concerned that Greater Manchester is not releasing enough Green Belt land to accommodate growth planned.
- Environment Agency 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.
- Natural England sought to work with the GMCA to strengthen the plan to deliver stronger protection for the natural environment. They raised a number of concerns regarding the Habitat Regulation Assessment.

- 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.
- Historic England made detailed comments to the whole plan and stated the GMSF did not show an appreciation of the area's heritage and this should run throughout the Plan. They also raised gaps in the historic environment evidence base underpinning the plan.
- 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.
- Peak District National Park Authority raised concerns about the Chew Brook Vale allocation largely related to the impact of this proposed development on the Peak District National Park.
- Manchester University Hospital NHS Foundation are seeking clarification regarding delivery options for the Metrolink Manchester Airport Line Western Leg Extension.

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

- 9.1** This section of the Duty to Co-operate Statement should be read along site Section 16 of the Log of Collaboration below relating to the same period of Plan preparation.
- 9.2** Greater Manchester's Plan for Homes, Jobs and the Environment: Publication Greater Manchester Spatial Framework was approved by Joint GMCA/AGMA Executive on 30th October 2020.
- 9.3** 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.
- 9.4** 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.
- 9.5** 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

- 9.6** Since the consultation period ended on the Revised Draft GMSF 2019 considerable work has taken place to support the plan with further studies including those related to viability and transport evidence. The GMCA Governance structure engaged all ten local authorities as part of the Joint GMCA/AGMA Executive Board, Transport for Greater Manchester, Natural England as a member of the Natural Capital Group, Homes England as a member of the Planning and Housing Commission, the GM Local Enterprise Partnership and Greater Manchester Natural Capital Group (Local Nature Partnership) through the Green City Region Board. Regular meetings took place with Highways England, the Environment Agency, Natural England and Historic England to progress studies and evidence supporting the Plan and to resolve outstanding matters and reach agreement, details are set out below.
- 9.7** Further duty to co-operate activity took place with neighbouring authorities being asked if they would be willing to accommodate any housing and employment provision and all replied they were unable to accommodate any of Greater Manchester's growth. The comments made by Duty to Co-operate bodies to the Revised Draft GMSF 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. A series of meetings took place with neighbouring authorities to discuss the transport evidence supporting the GMSF, details are set out below.

Environment Agency

- 9.8** The Environment Agency raised concerns about the need for flood risk evidence to support the 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 SFRA identified gaps in understanding of future climate change impacts and this additional work should form part of the Level 2 SFRA work.
- 9.9** 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.
- 9.10** 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 GMCA and Environment Agency continue to have weekly catch-up meetings to discuss water related planning matters

Historic Environment

- 9.11** 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.
- 9.12** Further evidence prepared during this period includes:
- Historic Environment Background Paper
 - Archaeological and Built Heritage Assessment and Screening Exercise
 - Site Level Heritage Assessments
- 9.13** 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

- 9.14** 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.
- 9.15** 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).
- 9.16** 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.
- 9.17** 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 approximately every 6 weeks. The working group has had GMSF 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

- 9.18** 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 needed 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

9.19 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.

9.20 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. Helens Council
- Warrington Council
- West Lancashire Borough Council and
- West Yorkshire Combined Authority.

9.21 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 16 of the Log of Collaboration.

Peak District National Park Authority

9.22 The Peak District National Park Authority 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 Peak District National Park Authority are supportive of the redevelopment of the former Fletcher Mill but raised 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.

- 9.23** Oldham Council and Peak District National Park Authority 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.
- 9.24** 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 around 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 July 2021

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

- 10.1** This section of the Duty to Co-operate Statement should be read along site Section 17 of the Log of Collaboration below relating to the same period of Plan preparation.
- 10.2** 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 Plan. The new Joint Committee approved the PfE Plan 2021 on 20th July 2021. Consultation began 9th August and ran for 8 weeks until early October 2021.
- 10.3** The Table below shows the approval route for the Publication PfE Plan and the various committee meetings from the Joint Committee to PfE authorities Council 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

- 10.4** Detailed in the Log of Collaboration is the continued collaborative activity undertaken 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. A response is still awaited from Stockport MBC.
- 10.5** During this time considerable duty to co-operate activity took place with neighbouring authorities including an email sent in June 2021 by TfGM on behalf of the PfE districts reminding neighbouring authorities that the approach to the transport evidence

supporting the PfE had been shared with them in December 2020 alongside the updated Transport 2040 5 Year Delivery Plan. Meetings took place with Cheshire East and Chorley providing further clarification on the transport evidence shared.

- 10.6** Regular meetings took place with Highways England as members of the Greater Manchester Highways Strategy Board, the Highways England and TfGM Strategic Working Group Meeting and meetings between Highways England, TfGM and PfE Representatives to progress outstanding concerns relating to the SRN. Duty to co-operate activity also took place with Historic England and Natural England as set out below and in the Log of Collaboration in Section 17.

Historic England

- 10.7** Regular meetings have taken place to discuss the content of the PfE Plan. 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 Plan. This included the changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment, this is shown in Section 17 below. The main areas discussed were the 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 of Greater Manchester to use the Greater Manchester Strategy vision.
- 10.8** 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.
- 10.9** GMCA engaged in an exchange of emails and Historic England sent a further Table in July 2021 with further suggested solutions to overcome the issues highlighted, this is shown in Section 18.7 below with the PfE suggested responses to their comments.
- 10.10** 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

- 10.11** 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 Plan to deliver natural capital net gains in the areas of wetland habitat and enable a functioning nature recovery network.
- 10.12** 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 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).
- 10.13** 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
- 10.14** Changes to the Greener Places chapter have taken on board many of Natural England's comments. It has been strengthened with 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 Natural England's 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.
- 10.15** Natural England made comments that some sections of undeveloped mossland are considered inappropriate for future development.

Habitat Regulation Assessment

- 10.16** Since the 2019 Revised Draft GMSF, 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. Between the Revised Draft GMSF and the Publication of Places for Everyone, 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.
- 10.17** 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.
- 10.18** 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

- 10.19** 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).
- 10.20** 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 also continue to do this through the existing Memorandum of Understanding that has been in place for the last five years with the TfGM.
- 10.21** 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."
- 10.22** Highways England confirm they are working with TfGM and the GMCA to examine the potential impacts of the plan on the SRN.

Stockport Metropolitan Borough Council

- 10.23** In the light of the withdrawal of Stockport Council from GMSF, it has been necessary to 'reset' the Duty to Co-operate arrangements.
- 10.24** Since Stockport's Departure in December 2020 the following activities have taken place:
- Meeting between PfE representative and Stockport MBS 11th 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 3rd March 2021 asking for the PfE Plan to continue accommodating some of Stockport's housing and employment provision including up to 30% of their housing provision.
- Response from PfE districts 19th 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. The PfE districts asked Stockport if it had any capacity to accommodate any of the PfE housing growth.
- Meeting 26th 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 14th 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 of GM 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. (Slight amendments have been made to this Statement to reflect the revised Stockport Local Plan Timetable and the PfE Submission date).

Co-operation Between the 10 Greater Manchester Authorities

- 10.25** In November 2014 the 10 Greater Manchester authorities resolved to prepare a joint development plan document, known as the Greater Manchester Spatial Framework.
- 10.26** 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.
- 10.27** 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.

- 10.28** 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.
- 10.29** 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.
- 10.30** The 10 authorities worked together to:
- Agree the objectively assessed needs for housing and employment across the plan area
 - Identify the existing land supply available for development following an optimisation process
 - Agree that there was a shortfall in existing land supply to meet needs
 - Engage constructively with neighbouring authorities outside of GM to explore the opportunity for some of our need to be met elsewhere
 - 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
 - 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

- 10.31** 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 :
- Strong and continued growth at the conurbation core
 - Focus on regeneration of the inner areas around the conurbation core
 - Boosting the economic performance of the northern districts
 - Sustaining southern competitiveness
 - Main Town Centres
 - Rapid Transit routes

- 10.32** 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

- 10.33** 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.
- 10.34** 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
- 10.35** 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.
- 10.36** 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).

- 10.37** 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.
- 10.38** 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.
- 10.39** 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

- 10.40** 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.
- 10.41** 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.
- 10.42** Stockport Council is committed to preparing its own local plan.
- 10.43** 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.
- 10.44** 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.

- 10.45** 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. It is acknowledged that Stockport is in the process of progressing its own Local Plan and evidence base, specifically work is underway to update the SHLAA. Stockport confirmed on 10th February 2022 that this ongoing work was not anticipated to result in a significant change to their housing or employment land supply positions, indicating that there will be unmet needs. However, as this work has yet to be finalised and published, it is too early to be able to have informed discussions on potential distribution of development needs.
- 10.46** 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.
- 10.47** The timetable for Places for Everyone, anticipates a consultation on a Regulation 19 plan anticipated in August 2021, Submission February 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 Stockport's assessment of it.
- 10.48** Stockport is intending to consult on a Regulation 18 (Preferred Options) in Summer/Autumn 2022.

- 10.49** 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 Submission Places for Everyone - August 2021 to February 2022

- 11.1** This section of the Duty to Co-operate Statement should be read along site Section 18 of the Log of Collaboration below relating to the same period of Plan preparation.
- 11.2** At the commencement of the Publication consultation an Individual Duty to Co-operate Log of Collaboration, the PfE Statement of Common Ground and Cross Boundary Flow were sent to each of the duty to co-operate bodies actively involved with the PfE preparation. They were offered the opportunity to meet with the GMCA to discuss any outstanding duty to co-operate matters.
- 11.3** Meetings have taken place between the PfE Publication Consultation and Submission with Calderdale Council, Kirklees Council, Cheshire West and Chester Council, Historic England, Natural England, National Highways, Stockport MBC, St Helens, Warrington Council and West Yorkshire Combined Authority. An email exchange also took place with Cheshire East seek alterations to the Statement of Common Ground and Duty to Co-operate Statement and Log of Collaboration. Details of matters discussed and outcomes from these meetings and emails exchanges are provided in the Log of Collaboration.
- 11.4** A report was taken to GM Local Enterprise Partnership Board on 22nd September 2021 and GM Natural Capital Group (Local Nature Partnership) on 1st October 2021 updating members of both groups on the progress of Places for Everyone Publication Plan and requesting they agree that the draft Duty to Co-operate/Statement of Common Ground accurately represents the position with the GM Local Enterprise Partnership/ GM Natural Capital Group and seeking a signature to the Statement of Common Ground. The GM Natural Capital Group sought continued working with the PfE districts on peat and carbon neutrality. Both organisations signed the Statement of Common Ground.
- 11.5** At the Publication stage, comments were received from Cheshire West and Chester; Chorley Council; Environment Agency; Historic England; Homes England; Liverpool City Region; Manchester University Hospitals NHS Foundation Trust; National Highways; Natural England; NHS Property Services; Peak District National Park Authority; St. Helen's Council; and West Lancashire Borough Council (WLBC). These are set out in the Log of Collaboration, Section 18.1.

Historic England

- 11.6** Historic England met with GMCA on 2nd November 2021 to discuss comments made to PfE publication. They are seeking further changes to the PfE to better reflect the historic environment within the plan. Discussion followed a table of amendments submitted by Historic England during the PfE Publication consultation.

- 11.7** The PfE Submission Statement of Common Ground and Historic England's Individual Log of Collaboration was sent for signing on 14th December 2021. On 17th December 2021 they replied stating:

"At the moment we are concerned that the SoCG does not set out in detail our position on the outstanding matters as per our comments through the Reg. 19 consultation. We intend to come back to you by 14th January. In addition, are you able to inform me whether going into Examination in Public there will be a more detailed statement which goes through each of the comments submitted by Historic England as part of the Regulation 19 consultation and whether it is agreed or there is disagreement that these should be resolved through main modifications to the Local Plan."

- 11.8** The GMCA emailed a response on the 5th January 2022, seeking to reassure Historic England that they were working through the comments and were in the process of updating the table of comments, which was the subject of the 2nd November 2021 meeting. It also clarified the purpose of the Statement of Common Ground as showing the position at this point, either to resolve an issue, commit to ongoing working to resolve the issue or set out a commitment to pick up the issue in other statutory documents, such as a local plan. It also explained their representation would be given consideration and will be addressed through the normal process of the examination.

- 11.9** On 26th January 2022, a further email was sent to Historic England referring to the discussions between the parties and indicating the PfE districts hadn't received any further update from Historic England as of 14th January 2022, as suggested in previous correspondence. The email sought to try and reach a resolution to the on going duty to co-operate matters and secure a signature to the Statement of Common Ground. It attached the latest Statement of Common Ground with slight amendments to Statement 10 Heritage and the Individual Log of Collaboration and Signing Sheet for Historic England. It stated:

"Since my email of the 5th January, we have continued to work through all the comments submitted to the Regulation 19 PfE Plan, including those made by Historic England and in line with Regulation 22 we are producing a statement which will include a summary of the main issues raised in those representations together with summary responses to those main issues. We will share this with you as soon as possible, but we consider that Historic England should be in a position to sign the SoCG in advance of it being shared. The Statement of Common Ground summarises where we have got to i.e. resolution or continuing ongoing work on both this plan and commitment for other statutory documents, i.e. district local plans, to deal with issues.

In relation to how your detailed representations will be dealt with going forward through the Examination, it would be our intention to provide more detailed statement(s) which would set out where there is agreement and/or disagreement and how these matters could be resolved."

- 11.10** Historic England sent a letter dated 27th January 2022 and confirmed that the GMCA (on behalf of the nine districts) has fulfilled its legal obligations under Duty to Co-operate and it is not objecting on this point. However, they again confirmed their position that they are unable to sign the Statement of Common Ground, the reasons given for not signing relate to the outstanding policy issues which they consider must be addressed before Places for Everyone Plan can be found sound, see Section 18.6 below.

National Highways

- 11.11** National Highways submitted comprehensive comments to the PfE Publication Plan. They commented on the thematic policies and allocations. They considered that the transport evidence provided at this stage is insufficient to be able to inform National Highways of the impact of the plan proposals at the SRN, at both an individual site allocations level and on a cumulative basis.
- 11.12** Ongoing work to enhance the transport evidence base in the form of an additional TfGM study, known as the 'Highways England Future Work Programme' should provide the additional evidence required. Information has been shared between the parties involved, on SRN junctions, merge/diverge analysis, a map of SRN smart/controlled motorway status and a discussion between junction modellers.
- 11.13** Collaboration between National Highways and their consultants WSP and TfGM and their consultants SYSTRA and the PfE districts has resulted in further exchanges of information and technical data between the PfE Publication and Submission stages.
- 11.14** A Workshop between all parties, discussed and agreed wording for Statement 11 Connected Places in the Statement of Common Ground. The purpose of Statement 11 is to establish the current position of Transport for Greater Manchester (TfGM), the nine Greater Manchester authorities and National Highways regarding the evidence base supporting the PfE, in respect of the strategic road network (SRN), since the October 2021 Regulation 19 Representation. This seeks to demonstrate the ongoing and effective joint working between National Highways, TfGM and the nine authorities – both in the preparation of the Plan and in the ongoing delivery of the schemes identified to support the Plan.
- 11.15** In a meeting on 2nd February 2022 National Highways noted that the duty to cooperate requirements had been met throughout the GMSF/PfE process. On 11th February 2022, National Highways signed the PfE Statement of Common Ground.

Minerals and Waste

- 11.16** Cheshire East and Cheshire West and Chester raised the matter of minerals and the provision of mineral aggregates supply to serve the growth set out in the PfE. A request was made for a review of both the GM Joint Minerals and GM Joint Waste Local Plans. Particular concern was raised around the need for a minerals local plan review and a commitment was made to add this to the PfE districts individual Local Development Schemes.

Natural England

- 11.17** At the Publication stage, Natural England raised concerns about the strength of the PfE thematic policies regarding development on peat, particularly in relation to JPA33 New Carrington, JPA29 Port Salford Extension and JPA28 North of Irlam Station. Natural England stated that they do not support the principle of developing on peat and have concerns regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA.
- 11.18** Natural England also submitted comments stating that the PfE was unsound with respect to the HRA as the Air Quality Assessment report concluded that an Appropriate Assessment was required and at the time, it was incomplete and the scale of impacts unknown. Also the availability of appropriate mitigation was unknown. Natural England stated: "Without this information it is not possible for PfE HRA to conclude that there will be no adverse impact on site integrity as a result of delivering the proposed growth in the Plan and the allocations are at risk of becoming undeliverable if the Habitats Regulations cannot be satisfied."
- 11.19** Further comments related to Recreational Disturbance to the Peak District Moors (South Pennine Moors Phase 1) Special Protected Area. Natural England stated that the HRA has identified potential effects in relation to in-combination recreational impacts on the Peak District Moors. Natural England's view is that the recommended mitigation measures require strengthening and the site allocation policies in the Plan need to reflect the measures proposed in the HRA.
- 11.20** In response to Natural England's comments on the Publication PfE, the GMCA on behalf of the PfE districts, is continuing to work with Natural England to address their comments with further work on the HRA comprising:
- Assessing the 'in combination effect' on air quality from the PfE with Warrington Borough Council's Local Plan for the Manchester Mosses SAC;
 - Assessing air quality impact on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA from the A57, A672 and A6024;
 - Assessing air quality impact on the Rochdale Canal SAC;

- Assessing recreation impacts on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA.
- Securing mitigation measures in agreement with Natural England to alleviate adverse impacts on protected sites if the outcome of the assessments, noted in the bullet points above, indicate that mitigation is required.
- Liaising with United Utilities to confirm that wastewater can be managed effectively to ensure that there will be no adverse impact on the Mersey Estuary SPA.

11.21 Natural England signed the PfE Statement of Common Ground on 10th February 2022.

Stockport

11.22 A meeting took place 15th December 2021. This discussed various cross boundary matters including an employment site in Stockport which is subject to an Appeal and a housing application in Tameside. It also discussed the Stockport Local Plan and the Statement of Common Ground.

11.23 Stockport received an updated Submission PfE Statement of Common Ground on 14th December. At the meeting, it was explained this is similar to the Publication Statement of Common Ground sent in August 2021 and only minor amends to update it for Submission. The Statement of Common Ground has a Signing Sheet which identifies the “Statements” relevant to Stockport.

11.24 The GMCA explained the approach to collaboration had been through the Governance structure of the Joint GMCA/AGMA and subsequent Joint Committee. Despite Stockport no longer being part of the PfE, the PfE districts and Stockport were collaborating through a variety of means including all being members of the GMCA, GM LEP, GM Natural Capital Group and TfGM. Also, most of the evidence base was developed through collaborative involvement with Stockport when they were part of the GMSF. Plus, there was significant duty to co-operate activity since December 2020 which is set out in the Statement of Common Ground and Duty to Co-operate Statement and Log of Collaboration.

11.25 Stockport colleagues indicated that they would need time to review the document before responding and it was unlikely that they would be able to provide a signed document before January 2022. Given this likely delay in signing the document, Stockport colleagues were asked if they could identify those matters which could be signed sooner rather than later and those which may require more discussion, as this would assist the timely preparation of the PfE Submission documentation.

11.26 The GMCA reminded Stockport that they are yet to respond to the formal request in April 2021 asking if they are able to accommodate any of the PfE’s unmet need. A previous formal request was made to all neighbouring authorities including Stockport.

- 11.27** Also, discussed was the Schedule of evidence jointly prepared in support of the GMSF, which Stockport intends to use to support their Local Plan preparation. This was appended to the meeting note, which was sent to Stockport and is shown Section 18.5 below. The next steps were identified as :
- Stockport invited Tameside to work jointly with them on any cross boundary future transport funding schemes.
 - Stockport and Tameside agreed to meet to discuss issues arising out of the current planning application at Godley Green. This would involve officers from Stockport, Tameside, TfGM and the GMCA.
 - Stockport to respond to the request to accommodate any of the unmet need in the PfE Plan
 - Stockport to consider the PfE Submission SofCG and the Statements identified as requiring a signature from Stockport.
 - Stockport to write to the PfE districts to update them in relation to their current local plan timetable.
- 11.28** A note of the meeting was sent on 21st December 2021 with a request that if they had any comments or amends these would be considered and, if possible, made accordingly. A further email was sent on 10th January 2022 stating that the record of the meeting was to be added to the Duty to Co-operate Statement and Log of Collaboration, with the schedule of PfE (GMSF) evidence Stockport intend to use in support of their Local Plan. It explained that if no response was received by 21st January 2022, it would be assumed that Stockport had no comments or amendments to the meeting note. A reply was received on 13th January 2022 stating "We are currently reviewing and will revert with our comments asap. I note that you wish to see these by 21st January and we will endeavour to meet this deadline. In the event we are unable to do so this should not however be taken as Stockport having no comments."
- 11.29** On 25th January 2022, a further email was sent to Stockport from the GMCA on behalf of the PfE districts. It dealt with the outstanding Duty to Co-operate matters remaining between Stockport and the PfE districts and the PfE Statement of Common Ground.
- 11.30** A series of email exchanges took place with Stockport between 8th February and 11th February 2022 seeking to agree amendments to the PfE Statement of Common Ground. These related to suggested amendments to the PfE Statement of Common Ground, an amendment to the 15th December 2021 meeting note and also confirmed that Stockport were unable to accommodate any of the PfE districts unmet need.
- 11.31** It is considered that the Statement of Common Ground as forwarded on 10th February 2022 is an accurate reflection of the current position between the PfE districts and Stockport. On 14th February 2022, Stockport MBC signed the PfE Statement of Common Ground.

Signatures

11.32 Emails were sent to the Duty to Co-operate Bodies in November and December 2021 along with an updated Individual Log of Collaboration seeking signatures to the Statement of Common Ground.

11.33 Signatures to the Statement of Common Ground have been received from the following neighbouring authorities and relevant public bodies:

- Mayor of Greater Manchester (TfGM)
- Blackburn with Darwen Borough Council
- Bury Clinical Commissioning Group
- Calderdale Council
- Cheshire East Council
- Cheshire West & Chester
- Chorley Council
- Derbyshire County Council
- Environment Agency
- GM Local Enterprise Partnership
- GM Natural Capital Group
- High Peak Borough Council
- Kirklees Council
- Lancashire County Council
- Liverpool City Region
- Manchester University Hospitals NHS Foundation Trust
- National Highways
- Natural England
- NHS Property Services
- Peak District National Park Authority

- Rossendale Borough Council
- Salford Clinical Commissioning Group
- Stockport Metropolitan Borough Council
- Warrington Council
- West Lancashire Borough Council
- West Yorkshire Combined Authority

- 11.34** Homes England indicated in a letter that they do not generally comment on the content of specific policies or Plans and do not wish to be a signatory of the Statement of Common Ground. However, they are satisfied that the GMCA has engaged constructively, actively and on an ongoing basis with Homes England during the preparation of the Places for Everyone Plan.
- 11.35** St Helens have confirmed they have started the process to seek a signature and will respond as soon as this is completed.
- 11.36** A number of Duty to Co-operate organisations have not engaged with the PfE preparation, despite being consulted at each stage, namely, the Civil Aviation Authority and the Office of Rail Regulation. Signatures have not been sought from these organisations.

12 Formative Proposals for the Greater Manchester Spatial Framework - March 2013 to November 2014

12.1 GMCA Governance

Date	Governance	Minutes	Action
29/08/14	GMCA/AGMA Executive Board	To approve the GMSF Consultation on Objectively Assessed Development Need and Technical reports for public consultation to be undertaken over a six week period.	Approve the consultation and technical reports for a public consultation to be undertaken over a six week periodBegin 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.	
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 employment land requirements and associated infrastructure across Greater Manchester as a joint	Delegate the formulating and preparing of the GMSF to the GMCA/AGMA Executive Board Agree the recommendation to prepare a statutory Development Plan Document (DPD)

		development plan document. 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.	Approve the amendment to the AGMA constitution by deleting the words "initially in terms of Waste and Mineral Planning"
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Table 12.1 Collaborative Activity within GMCA Governance

12.2 Neighbouring Authorities

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	AGMA/GMCA provided an update on GMSF progress. Population projections forecast show 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.

Warrington	25/10/13	Meeting	AGMA/GMCA provide an update on GMSF progress and discussed the preparation of the SHMA. 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 housing in parts of High Peak.
Rossendale	19/11/13	Meeting	AGMA/GMCA provide an update on GMSF progress and discussed the preparation of the SHMA. 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	AGMA/GMCA provide an update on GMSF progress and discussed the preparation of the SHMA. 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 12.2 Collaborative Activity with Neighbouring Authorities

12.3 Duty to co-operate Bodies Responses to Consultation

Organisation	Summary of Comment
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	<p>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.</p> <p>The Objectively Assessed Need is too low but they do not specify any calculated Objectively Assessed Need figures.</p>
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 Objectively Assessed Need.
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 12.3 Duty to Co-operate Responses to Consultation

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

13.1 GMCA Governance

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.	GMSF to become a standing item on the agenda. A proposal on the role of the commission/scope of the GMSF to be brought to the next meeting
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 requesting approval for the consultation on strategic growth options beginning on the 9th November for six weeks.	Note the report and agree the approach Delegate responsibility to make final amendments to the consultation documents to the Lead Chief Executive. Agree that GM continue discussions with DCLG as outlined in Section 3.
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.	

Table 13.1 Collaborative Activity within GMCA Governance

13.2 Neighbouring Authorities

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.
GMCA, Trafford, Stockport, Manchester & Cheshire East	23/06/15	Meeting	GMCA 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. GMCA 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 with Cheshire 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. Helens	30/11/15	Meeting/Email	St. Helens 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. Helens 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 Helens 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 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	<p>Presentation providing an update on GMSF, plus evidence related to commuting patterns between West Lancs and GM.</p> <p>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.</p>
Blackburn, Burnley and Rossendale	10/12/15	Email/meeting	<p>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.</p> <p>Transport accessibility was identified as the most significant issue for Rossendale, Burnley and Blackburn - this issue and growth strategy for homes (including the OAN) and jobs requires a Lancashire wide discussion.</p>

Table 13.2 Collaborative Activity with Neighbouring Authorities

13.3 Duty to Co-operate Bodies Responses to Consultation

Body	Comments
Blackburn with Darwen Council	Blackburn with Darwen Borough Council fully supports the scope and vision of the GMSF. Particular emphasis in Pennine Lancashire should be 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 Blackburn with Darwen's aspirational housing growth agenda. It is crucial to 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	<p>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.</p> <p>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.</p>
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 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.
West Lancashire 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.

Table 13.3 Duty to Co-operate Bodies Response to Consultation

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

14.1 GMCA Governance

Date	Governance	Minutes	Actions
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	GMCA/AGMA Executive Board	Update on the Strategic Options consultation. Responses received from 170 organisations along with 650 sites submitted through the 'Call for Sites' exercise.	Note the report. Agree the approach to assessing development viability of existing supply.

		Majority of responses relate to the ambition of GM and the methodology used to calculate 'Objectively Assessed Need'.	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.	Infrastructure Advisory Group 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	GMCA/AGMA Executive Board	The report noted that GM has asked neighbouring 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	GMCA/AGMA Executive Board	Report discussing the GMSF evidence base and growth options. It notes that growth prospects within Accelerated Growth Scenario 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.	Note the analysis that has been undertaken to inform the economic and demographic growth forecasts for the GMSF. Agree the level of growth under Accelerated Growth Scenario 2015 as outlined in paragraph

		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%)	7.4 should be recommended to the GMCA as the preferred growth option for the GMSF.
30/09/16	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.	Note the report and agree the approach. Delegate responsibility to make final amendments to the consultation documents to the Lead Chief Executive.
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	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 Town and Country Planning (Local Planning) (England) Regulations 2012.	Note the report and agree the approach. 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 14.1 Collaborative Activity within GMCA Governance

14.2 Neighbouring Authorities

District	Date	Activity	Key Points
GMCA	March 2016	Comments invited	<p>Green Belt Assessment</p> <p>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.</p> <p>The Duty to Co-operate partners for the Greater Manchester Green Belt study include:</p> <ul style="list-style-type: none"> • Blackburn with Darwen BC • Calderdale Council • Cheshire East Council • Chorley Borough Council • High Peak Borough Council • Peak District National Park Authority • Kirklees Council • Rossendale BC • St Helens Council • Warrington Council • West Lancashire BC

			Comments received were discussed with the Steering Group and incorporated as appropriate.
GMCA	7/06/2016	Email	<p>Meeting Greater Manchester Housing Need</p> <p>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:</p> <ul style="list-style-type: none"> • Blackburn with Darwen BC • Burnely • Calderdale Council • Cheshire East Council • Chorley BC • High Peak BC • Kirklees Council • Rossendale BC • St. Helens Council • Warrington Council • West Lancs BC
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	<p>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.</p> <p>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 their own needs.</p>
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 with Darwen	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

			<p>the timescales in question this will translate into an increase in levels of commuting into GM from Blackburn with Darwen.</p> <p>It is expected this impact will be over the medium term and that a housing requirement taking into account increased commuting into GM would need to be considered in the period after 2026.</p> <p>Importantly, we would not view this as 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.</p>
Calderdale/Kirklees	08/09/16	Email response to GMCA 7/06/2016	<p>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.</p>
Cheshire East	29/11/16	Meeting	<p>More explicit wording needed on transport and linkages. GM2040/SEMMS2 findings due June 2017. Cheshire East's Cabinet are concerned as well with the relationship with Handforth North Cheshire Growth village (2,200 homes) - work needed on social infrastructure and new education facilities.</p>
Chorley	06/12/16	Meeting	<p>Update on local planning position, housing and evidence. GMSF issues discussed included net out migration, commuting and updating the Gypsy Travellers Accommodation Assessment.</p>
Warrington/ St. Helens	13/12/16	Meeting	<p>Working on a joint SHELMA with the Liverpool City Region - expected late January/ early February 2017.</p> <p>Need to ensure GMCA/LCR aren't double counting the need for logistics. Warrington seeking access to the Irlam/Cadishead site from Warrington.</p>

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	<p>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.</p> <p>SEMMMS re-fresh is underway (due Spring 2017) and will explore issues with the A6 and deliverability of the High Lane proposal.</p> <p>A627 Mottram / by-pass – Highways network critical and will determine sites and phasing.</p> <p>Minerals and waste – GM imports crushed rock from Derbyshire County Council. If development is stepped up it will require an increase and concern exists over whether this can be met. Agreed to monitor through the Local Aggregate Assessment and maintain discussions through existing working groups.</p>
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.

St Helens, GMCA	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.
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Table 14.2 Collaborative Activity with Neighbouring Authorities

14.3 Duty to Co-operate Bodies Responses to Consultation

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	<p>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.</p> <p>Measures should be included in the plan policy's to encourage more sustainable modes of cross boundary commuting into / out of Cheshire East along.</p> <p>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.</p> <p>They also raise concerns around potential impact on the demand for social infrastructure generated from growth in GM.</p> <p>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 SEMMMS 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.</p> <p>Additional comments are made on the following policies:</p> <ul style="list-style-type: none"> • 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. They confirm 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 Authority	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 with Darwen Borough Council	<p>Comments relate to :rates of commuting increasing from BwD into GM as a result of planned growth in GMSF. BwD is supportive of a joint approach to establishing commuting assumptions to feed into housing requirement modelling work.</p> <p>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.</p> <p>BwDBC anticipates that the next steps in light of its comments would be:</p> <ul style="list-style-type: none"> • 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 East Lancashire Rail link 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	<p>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.</p> <p>Bury Clinical Commissioning Group seek greater inclusion of reference to S106 and Community Infrastructure Levy.</p>
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 14.3 Collaborative Activity with Duty to Co-operate Bodies

15 Revised Draft of the Greater Manchester Spatial Framework - February 2017 to March 2019

15.1 GMCA Governance

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.	Produce an issues and options paper on environmental targets. Explore how other cities are 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.

Date	Governance	Recommendations	Actions
			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.	That the report be noted Officers to feedback their comments by the end of August. Update to be given at the next meeting.

Date	Governance	Recommendations	Actions
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	GMCA Head of Planning Strategy 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.	

Date	Governance	Recommendations	Actions
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 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 GMCA Head of Planning Strategy.	
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	

Date	Governance	Recommendations	Actions
		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 covering : 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; 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 detail and the assumptions behind them. A media release is currently being approved and will be circulated	Arrange a development session for Members to go through the existing land supply figures in more detail.

Date	Governance	Recommendations	Actions
		to Members and GM Leaders. GMSF: a small working group has been convened, if Members require a session for all Members this can be arranged to be held in April. Communications: GMCA are meeting with Urbed to discuss communication plans. Members received a presentation from TfGM which gave an update on the GMSF Transport Study Evidence Base.	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.	

Date	Governance	Recommendations	Actions
05/06/18	GM Housing Planning and Environment Overview and Scrutiny	Paul Dennett provided an update on the Greater Manchester Housing Package. In return for 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	Update on 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 GMCA Head of Planning Strategy 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	

Date	Governance	Recommendations	Actions
		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	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. 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 GMCA Head of Strategic Planning and Salford Head of Planning to Members. It covered the timetable, plan structure including the scale of growth and the alignment with a GM infrastructure strategy, communications and consultation. 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	

Date	Governance	Recommendations	Actions
		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, which noted that the work had involved working closely with the GMCA Planning team to ensure GMSF has a strong Bio-diversity Net Gain commitment that can be delivered on the ground.	
14/09/18	Transport for Greater Manchester	A report to outlining the process 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).	
17/09/18	Local Enterprise Partnership	Consideration was given to a 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 has 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 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.	

Date	Governance	Recommendations	Actions
04/12/18	Planning & Housing Commission	The Chair Paul Dennett, provided members with a verbal update on the progress of the GMSF. It was advised that a report would be presented to a special joint meeting of the 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. 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 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 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.	Resolved: That the GMSF: Revised Draft 2019 and Integrated Assessment be approved for consultation purposes.

Date	Governance	Recommendations	Actions
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 which refers to the GMSF Consultation Draft.	Paul Dennett to share the draft response sent to the Housing Minister.

Date	Governance	Recommendations	Actions
14/03/19	GM Housing Planning and Environment Overview and Scrutiny	The Draft 5 Year Environment Plan was considered. It was noted that the GMSF includes a proposal to require all new housing developments to be Net Zero Carbon by 2028.	

Table 15.1 Collaborative Activity within GMCA Governance

15.2 Neighbouring Authorities

District	Date	Activity	Key Points
West Lancs, GMCA	27/03/17	Meeting	West Lancashire held a Duty to Co-operate Meeting on their Issues and Options for their Local Plan.
Rossendale, GMCA	13/06/17	Meeting	<p>GMSF update including explaining Rochdale, Bury and GMCA are working with Atkins to develop a Masterplan for the Northern Gateway.</p> <p>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. Rossendale BC is advocating using the Borough boundary for the purposes of the SHMA. This received general support.</p> <p>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.</p> <p>Retail -Potential of the Pennine Bridleway links into Rossendale</p> <p>Transport - The importance of improving the A56/M66 corridor and having an integrated approach to transport masterplanning of the "Northern Gateway"</p>

			<p>Environment - various studies and issues discussed including Rochdale acknowledging they are looking to identify Scout Moor as an area of search for large wind turbines.</p> <p>Duty to Co-operate - approach will be conducted through a letter from the relevant parties and not a memorandum of understanding.</p> <p>A consensus has been reached between Rossendale and GMCA on the approach to the SHMA.</p>
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	<p>Letter dated 18th July to Chief Executive St. Helens Council from Director Economy and Environment at Wigan showing Wigan have agreed to fund 5% of the M6 Junction 23 Feasibility Study- Liverpool City Region Single Investment Fund.</p> <ul style="list-style-type: none"> • 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 Corridor. • If improvements are required these may be programmed into Highways England Road Investment Strategy to prioritise for public sector funding after 2019/20.

Bury Clinical Commissioning Group, Bury MBC	27/07/2017	Meeting	Bury Council outlined latest on GMSF and Local Plan, including 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 to Stockport SEMMMs Refresh Issues and Options Consultation and agreement of next steps.
Bury Council, Greater Manchester Ecological Unit	27/10/2017	Meeting	GMSF Green Infrastructure and Ecology Issues GMEU: <ul style="list-style-type: none"> • 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 Reservoir - 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	09/11/2017	Meeting	<p>Discussed the main draft allocations in respect of their highways issues, namely Walshaw, Elton Reservoir and Northern Gateway.</p> <p>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.</p> <p>Elton and Walshaw sites will have a cumulative impact on each other.</p> <p>Elton: There is an opportunity to open up bus travel opportunities that currently do not exist.</p> <p>NG1: Potential for improved bus services and the employment provision will help support a new network.</p>
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	<p>All of Bury's draft allocations were discussed in respect of their flood risk issues.</p> <p>Canal Rivers Trust and Environment Agency 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. Canal Rivers Trust to hold further discussions with regarding Elton Reservoir.</p> <p>United Utilities noted where there were capacity problems on their network and need for easements. United Utilities to confirm where known constraints exist.</p> <p>All new developments should provide alternatives for drainage into the sewerage system.</p> <p>United Utilities require a holistic drainage strategy to be prepared for each allocation.</p>

Peak District National Park Authority and Stockport	15/11/2017	Meeting	This was a Duty to Co-operate meeting between Stockport and the Peak District National Park Authority. 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	<p>Bury 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.</p> <p>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.</p>
Peak District National Park Authority 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 style="list-style-type: none"> Meeting held by Bury to discuss ongoing cross-boundary issues with regard to improving public transport connectivity for Rossendale residents to access Greater Manchester. 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 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

			<p>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 East Lancs Railway 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.</p> <ul style="list-style-type: none"> • 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	<p>Rossendale undertook a Duty to Cooperate meeting inviting various organisations including GMCA. Discussed was the Publication Rossendale Local Plan, which they are about to take out to consultation 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.</p>
Warrington Borough Council, GMCA, Salford City Council, Wigan Borough Council, Trafford Council, TFGM	11/06/2018	Meeting	<p>Discussions covered:</p> <ul style="list-style-type: none"> • GMSF Update • Warrington Local Plan • they can 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.

			<p>Modelling work has been undertaken and TFGM would like sight of this work.</p> <ul style="list-style-type: none"> • Salford Local Plan - discussions around Western Cadishead and Irlam GMSF and implications for Warrington. • Trafford Local Plan - commencing Local Plan Review shortly • Salford Duty to Co-operate/ Statement of Common Ground to be published alongside Reg 18 Draft Plan. Warrington, Cheshire West and Cheshire East are a pilot for Statements of Common Ground. • Update on GM Authorities liaison meetings with EA/NE/UU
M66/A56 Steering Group hosted by Rossendale Council	2017 - 2018	various	<p>TfGM attend the quarterly meetings of the M66/A56 Steering Group hosted by Rossendale Council. The GMSF transport evidence base has been a standing item on the agenda since the group was established in 2017. The group is a forum for the sharing of information, to develop a comprehensive and shared understanding of where transport investment can be maximised to mitigate travel issues on the M66/A57 corridor, to review of progress on agreed partnership working and identify funding opportunities to develop and deliver potential transport interventions. Other attendees include National Highways, Lancashire County Council and the Witch Way bus operator Transdev.</p>
St Helens	21/03/19		<p>GM Mayor Andy Burnham letter made comments to St Helens Borough Local Plan 2020-25.</p>
Blackburn with Darwen	28/03/19		<p>GMCA, Bury and Bolton response to Blackburn with Darwen Local Plan: Issues and Options Consultation.</p>

Table 15.2 Collaborative Activity with Neighbouring Authorities

15.3 Public Bodies

Date	Public Body	Actions
February 2017- March 2019	Environment Agency	Weekly meetings with EA, GMCA and GBA Consulting to discuss the SFRA Level 1 study.
February 2017- March 2019	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 as infrastructure requirements that need to be considered.
February 2017- March 2019	Highways England	Highways England/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 Highways Strategy Board.

Table 15.3 Collaborative Activity with Duty to Co-operate Bodies

Greater Manchester Highways Strategy Board - discussing Transport Evidence

Date	Attendees
24th January 2018	Highways England, TfGM, GMP, GMCA
3rd May 2018	Highways England, TfGM, GMP, GMCA
31st July 2018	Highways England, TfGM, GMP, GMCA
4th December 2018	Highways England, TfGM, GMP, GMCA
26th March 2019	Highways England, TfGM, GMCA, Transport Focus

Table 15.4 GM Highways Strategy Board

Highways England/Transport for Greater Manchester Strategic Working Group Meeting and Other officer Level Meetings

Date	HE/TfGM Strategic Working Group Meeting and Other officer Level Meetings
22/05/2017	Western Study Area GMSG Workshop
24/05/2017	Eastern Study Area GMSG Workshop

Date	HE/TfGM Strategic Working Group Meeting and Other officer Level Meetings
26/05/2017	Northern Study Area GMSF Workshop
31/05/2017	North West Study Area GMSF Workshop
2/06/2017	Regional Centre Study Area GMSF Workshop
7/06/2017	Southern Study Area GMSF Workshop
11/07/2017	GMSF Interventions/ Wgis
04/12/2017	GMSF TfGM/Highways England
16/01/2018	GMSF Modelling Meeting
28/03/2018	HE/TfGM - GMSF Modelling Interface
06/03/2019	GMSF HE/TfGM Catch - up

Table 15.5 Officer Level Meetings between Highways England Consultants, TfGM and PfE Representatives

15.4 Duty to Co-Operate Bodies Responses to Consultation

15.1 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.

Duty to Co-operate Body	Summary of Comments to Revised Draft GMSF 2019
Blackburn with Darwen	<ul style="list-style-type: none"> Question data around commuting remaining stable between East Lancs and GM, especially with growth planned in BwD Concerned about impact of Clean Air Zone on BwD businesses, HGV's, buses & any planning mitigation Buses Bill – Permitting Local Bus services which originate in BwD and future Proposals for smart ticketing Improved Manchester Airport rail connections from BwD/ East Lancs and other rail connections into GM Joint approach to upgrade with A666
West Yorkshire CA, Calderdale & Kirklees	<ul style="list-style-type: none"> WYCA, Kirklees & Calderdale no comment to 2019 GMSF
Derbyshire CC & High Peak BC	<ul style="list-style-type: none"> High Peak are 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.

	<ul style="list-style-type: none"> • 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 concerns- <ul style="list-style-type: none"> • 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 style="list-style-type: none"> • Cheshire East raised concerns about public transport accessibility and potential congestion impacting their ability to access opportunities afforded by airport growth and the proposed HS2 station at the Airport. Also, CE visitor Strategy (Hotels at Airport City) • GI links cross boundary – ensure joined up plans ie HS2 & Airport • Digital Policy – cross boundary considerations ie Jodrell Bank & Alderley Edge • Developer contributions cross boundary, if required • SEMMMS supported • Raised specific comments on the following sites: <ul style="list-style-type: none"> • Heald Green

	<ul style="list-style-type: none"> • High Lane • Stanley Green • Woodford Aerodrome • Manchester Airport
Liverpool & St. Helens	<ul style="list-style-type: none"> • No comments to 2019 GMSF by St. Helens or Liverpool
Warrington	<ul style="list-style-type: none"> • No comments to 2019 GMSF by Warrington
Lancashire County Council	<ul style="list-style-type: none"> • Northern Gateway – increased travel demand between GM & Rossendale. M66 key to economic growth in Rossendale, further congestion due to impact of Northern Gateway is a concern. • Upgrade & electrification of railway linking Manchester, Bolton & Preston. Wishes to work with TfGM regarding growth in demand on this line to ensure there is capacity on the railway & trains
Chorley	<ul style="list-style-type: none"> • Seeking reference to responses to various GMSF drafts in Statement of Common Ground • Seeking reference to Gypsy, Traveller & Travelling Showpeople needs. How does provision of transit sites fit into GMSF. GMGTAA 2014 is now dated. Inadequate provision in Wigan & Bolton impacting on Chorley
Rossendale	<ul style="list-style-type: none"> • Seeking improved access to Bury & Rochdale • A56/M66 further congestion expected due to identifying Pilsworth for further economic development & Northern Gateway • Seeking a rail link between Rawtenstall and Manchester via Ramsbottom – Bury and Haywood, called Valley City Link. • Feasibility Study options <ul style="list-style-type: none"> • Tram-train connection with GM Metrolink at Bury/Buckley Wells or National Rail at Castleton South Junction • GM Strategy Option Tram- train from Heywood is not supported by Rossendale • Rossendale seeking to work with TfGM to help fund and facilitate a Strategic Outline Business Case for the whole Valley City Link • GM Transport Plan should recognise cycle routes in GM connecting into Rossendale

West Lancashire	<ul style="list-style-type: none"> 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. GM not releasing enough Green Belt land to accommodate growth
Environment Agency	<p>Flood Risk Evidence</p> <p>Level 1 SRFA – identified the strategic allocations & sites within the existing land supply that will require application of the Exception Test.</p> <p>Level 2 SFRA – future assessments needed to show that exception test can be applied appropriately & to justify the quantum of development.</p> <p>Level 1 SRFA identified gaps in understanding of future climate change impacts. This additional work should form part of the Level 2 SFRA work</p> <p>EA sought amendments to the Green Infrastructure policy to better reflect the role it can play in managing current and future flood risk.</p>
Natural England	<p>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.</p> <p>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).</p>

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)	<p>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.</p> <p>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.</p>
Homes England	Homes England Support the efforts to bring forward a strategic framework for the future needs of GM up to 2037 and to ensure the long-term housing needs and economic growth ambitions are met.
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 Authority	The Peak District National Park Authority 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 Peak District National Park Authority 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.

Table 15.6 Duty to Co-operate Bodies Responses to Revised Draft GMSF

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

16.1 GMCA Governance

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. The Housing Strategy is committed to delivering 30,000 social houses and 50,000 affordable houses.	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	Update on the GMSF, explaining 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 Greater Manchester Strategy was provided. The Commission have been 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.

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.	
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.	
14/11/19	GM Housing Planning and Environment Overview and Scrutiny	A report providing a six monthly update of the Greater Manchester Strategy (GMS) implementation plan and performance dashboards. Officers clarified that due to not having regulations in place to progress an Spatial Development Strategy, 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.
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.	

24/01/20	Planning & Housing Commission	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.
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. Head of Planning Strategy GMCA delivered a presentation on the Town Centre Challenge initiative. Regarding the GMSF, Members commented that they would welcome any GMCA guidance on protecting town centre development and how to support development of cultural centres.	That Scrutiny note and comment on the report and request further updates as appropriate.
24/07/20	Green City Region (Low Carbon Hub)	A short presentation was provided, summarising 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 Secretary 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	Review the report. Suggest any recommendations to AGMA Executive Board prior to consideration

		Covid lock-down restrictions and this period leading up to Christmas noted as a potential challenge.	
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 setting 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 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.	
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 the GMSF: Publication Plan 2020 and Submission of the GMSF 2020: Publication Plan.
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.
03/12/20	Stockport Council	Stockport Full Council resolved not to approve the Publication Draft GMSF for submission.	

04/12/20	Stockport Cabinet	Subsequently, Stockport Cabinet resolved not to approve Publication Draft GMSF.	
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.
11/12/20	Planning & Housing Commission	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.
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 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.	<p>1. That the preparation of a Joint Development Plan Document of the nine GM Local Authorities be agreed in principle.</p> <p>2. That a further report addressing the issues, set out in the report, be submitted to a future meeting.</p> <p>3. That the nine GM Local authorities be commended to establish a joint committee, with</p>

			delegated authority to co-ordinate and develop a Joint Plan on their behalf as the nine local planning authorities.
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Table 16.1 Collaborative Activity within GMCA Governance

16.2 Neighbouring Authorities

Date	Neighbouring Authority	Attendees	Summary
01/04/19	<p>Blackburn with Darwen</p> <p>Calderdale Council</p> <p>Cheshire East Council</p> <p>Chorley Borough Council</p> <p>High Peak Borough Council</p> <p>Kirklees Council</p> <p>Warrington Borough Council</p> <p>West Lancashire Council</p>		<p>Email from GMCA to 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."</p>

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 Authority	Oldham, GMCA	The meeting was focused on discussing the issues that were raised in the Peak District National Park Authority'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 Authority	GMCA, MCC, TFGM, Stockport, Oldham and Tameside	A talk through the work 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 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. The 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 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. The issues discussed were: GM housing and employment growth; Kirklees Local Plan; Calderdale Local Plan; ecological discussion; carbon neutrality; 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 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. The 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 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. The issues discussed were: GMSF published as a

			development plan document; minerals apportionment; Transport Delivery Plan; SEMMMs.
14/09/20	Liverpool City Region CA and St Helens	GMCA, MCC, TFGM, Wigan	A talk through the work 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. The 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 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. The 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 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. The 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 16/09/2021, 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.
2019-2020	M66/A56 Steering Group hosted by Rossendale Council	Rossendale, TfGM, National Highways, Lancashire	TfGM attend the quarterly meetings of the M66/A56 Steering Group hosted by Rossendale Council. The GMSF transport evidence base has been a standing item on the agenda since the group was established in 2017. The group

		County Council & Transdev	is a forum for the sharing of information, to develop a comprehensive and shared understanding of where transport investment can be maximised to mitigate travel issues on the M66/A57 corridor, to review of progress on agreed partnership working and identify funding opportunities to develop and deliver potential transport interventions. Other attendees include National Highways, Lancashire County Council and the Witch Way bus operator Transdev.
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Table 16.2 Collaborative Activity with Neighbouring Authorities

16.3 Public Bodies

Date	Body	Actions
2019-20	Highways England	Greater Manchester Highways Strategy Board met quarterly to discuss transport matters including progress on GMSF transport work. Attendees were: Highways England, 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 Greater Manchester Highways Strategy Board.
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.
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Table 16.3 Collaborative Activity with Duty to Co-operate Bodies

Greater Manchester Highways Strategy Board

Dates	Greater Manchester Highways Strategy Board Attendees
20th August 2019	Highways England, TfGM, GMP, GMCA
3rd December 2019	Highways England, TfGM, GMP, GMCA
21st April 2020	Highways England, TfGM, GMP, GMCA
2nd April 2020	Highways England, TfGM, GMP, GMCA
1st October 2020	Highways England, TfGM, GMP, GMCA
10th November 2020	Highways England, TfGM, GMP, GMCA
3rd December 2020	Highways England, TfGM, GMP, GMCA

Table 16.4 GM Highways Strategy Board

Greater Manchester Highways Strategy Board Working Group

Date	Meeting
23/01/2020	Highways Strategy Board Strategic Working Group
16/03/2020	Highways Strategy Board Strategic Working Group
14/04/2020	Highways Strategy Board Strategic Working Group
12/05/2020	Highways Strategy Board Strategic Working Group
11/06/2020	Highways Strategy Board Strategic Working Group
21/07/2020	Highways Strategy Board Strategic Working Group
11/09/2020	Highways Strategy Board Strategic Working Group
14/10/2020	Highways Strategy Board Strategic Working Group
10/12/2020	Highways Strategy Board Strategic Working Group

Table 16.5 Greater Manchester Highways Strategy Board Working Group

Officer Level Meetings between Highways England Consultants, TfGM and PfE Representatives

Dates	Officer Level Meetings between Highways England Consultants, TfGM and PfE Representatives
24/07/2019	Highways England GMSF/DP Consultation
07/08/2019	GMSF - Locality Assessments Scoping Meeting
17/09/2019	Rochdale GMSF Locality Assessments
19/09/2019	Bolton GMSF Locality Assessments
20/09/2019	GMSF Northern Gateway Locality Assessments GMSF Bury Locality Assessments
24/09/2019	GMSF
27/09/2019	Systra Briefs Systra - GMSF Sites
07/10/2019	GMSF Northern Gateway GM1.3
08/10/2019	GMSF GM1.1 and 1.2
18/10/2019	HE/TfGM Catch-up
21/11/2019	Northern Gateway
18/12/2019	HE/ SYSTRA Discussion on GMSF
21/01/2020	GMSF HE Discussion
27/01/2020	GMSF - GM45 New Carrington
26/02/2020	GMSF - Northern Gateway
27/02/2020	HE/TfGM Catch-up
15/05/2020	HE/TfGM Locality Assessment Catch-up
29/05/2020	HE/TfGM Locality Assessment Catch-up
12/06/2020	HE/TfGM Locality Assessment Catch-up

26/06/2020	HE/TfGM Locality Assessment Catch-up
10/07/200	HE/TfGM Locality Assessment Catch-up
24/07/2020	HE/TfGM Locality Assessment Catch-up
17/09/2020	Port Salford Transport Working Group
22/10/2020	Port Salford Transport Meeting
09/11/2020	GMSF Next Steps
12/11/2020	HE/ M66 Discussion
25/11/2020	GMSF SRN Scoping Note Discussion

Table 16.6 Officer Level Meetings between Highways England Consultants, TfGM and PfE Representatives

16.4 Neighbouring Authorities Duty to Co-operate Transport Meetings September 2020

16.1 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	<p>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.</p> <p>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.</p>
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 16.7 Blackburn with Darwen PfE Transport Evidence Meeting

Cheshire East Issue	Cheshire East 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.
Aggregate demand & Supply	<p>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.</p> <p>Cheshire East is currently unable to met its aggregate apportionment figures but is seeking to address this through its Minerals & Waste DPD which is currently in preparation. It is unlikely that Cheshire East will be able to provide any additional aggregate to meet the growth aspirations identified in the PfE over and above that which the Cheshire East area currently supplies</p>
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 SEMMM Strategy, which was original prepared by Stockport Borough Council and Cheshire East Council with input from TfGM, may need to be

updated. Recent work to refresh of the SEMMM Strategy was not formally agreed by all parties due to changing circumstances.

Table 16.8 Cheshire East PfE Transport Evidence Meeting

Lancashire County Council, Chorley, Rossendale, West Lancashire Issue	Lancashire County Council, Chorley, Rossendale, West Lancashire Comments
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 Northern Gateway 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 Northern Gateway area to work. It is important to improve the rail commuter route from Rossendale into Greater Manchester. 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 Greater Manchester, 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 Greater Manchester 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 Combined Authority structure at an early stage. This would grant transport authority. An interim plan to cover the next five years could be required.

Table 16.9 Lancashire CC, Chorley, Rossendale and West Lancashire PfE Transport Evidence Meeting

Derbyshire County Council, High Peak	Derbyshire County Council, High Peak
Issue	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 acknowledgement 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 16.10 Derbyshire CC and High Peak PFE Transport Evidence Meeting

West Yorkshire Combined Authority, Calderdale, Kirklees	West Yorkshire Combined Authority, Calderdale, Kirklees
Issue	Comments
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 the GMSF 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	<p>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.</p> <p>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.</p>
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	<p>West Yorkshire have done work on carbon pathways and published a report about scenarios for reaching carbon-neutral. WYCA circulated a link:</p> <p>https://www.wyca.gov.uk/media/277/wyca-climate-emissions-and-pathways-report-2017.pdf</p> <p>GMCA to share a link to a similar report, regarding the 2038 carbon-neutral target.</p>
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.
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Table 16.11 West Yorkshire CA, Calderdale and Kirklees PfE Transport Evidence Meeting

Liverpool City Region CA, St Helens	Liverpool City Region CA, St Helens
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 at J25 from 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 16.12 Liverpool City Region CA and St Helens PfE Transport Evidence Meeting

Peak District National Park Authority Issues	Peak District National Park Comments
Transport Modelling	<p>Peak District National Park Authority 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?</p> <p>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.</p>
Cycling and Walking	<p>Conscious that cycling and walking 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.</p> <p>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.</p>

	<p>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 Greater Manchester centre to the Peak District using smart, cross-modal ticketing.</p> <p>Stockport Metropolitan Borough Council are interested in looking for cross-boundary canal routes for cycling and walking 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. Stockport are interested in working with Peak District National Park Authority on cycle and walking routes crossing boundaries.</p> <p>TfGM and Stockport to engage with Peak District National Park Authority 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.</p>
Fletcher Moss Site	<p>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.</p> <p>How have the design principles moved on for Fletcher Moss site following these queries?</p> <p>Oldham have looked at the policy wording considering the comments made by Peak District National Park Authority. Some wording from the 2016 plan has been added back in and is awaiting sign off. Oldham are considering whether the Green Belt sites e.g. pods, hotels, should this be in the supporting text as aspirations. More details should come through at the masterplan stage.</p>

Table 16.13 Peak District National Park Authority PfE Transport Evidence 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 16.14 Warrington PfE Transport Evidence Meeting

17 Publication Draft Places for Everyone - January 2021 to July 2021

17.1 GMCA Governance

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	<p>On 11 December 2020, following the withdrawal of Stockport Council from the Greater Manchester Plan for 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.</p> <p>Each full Council will be asked approve the making of an agreement with the other eight Greater Manchester councils (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan) to prepare a joint development plan document to cover strategic policies including housing and employment land requirements and, as appropriate, strategic site allocations and Green Belt boundary amendments and associated infrastructure across the nine districts.</p> <p>Agree the district lead Member for the joint committee and a nominated deputy to attend and vote as necessary</p>

		<p>Note that the [Council's Executive / Cabinet] will be asked to delegate the formulation and preparation of the draft joint development plan document to a joint committee of the nine GM authorities.</p> <p>Note that a further report will be brought to full Council seeking approval to submit the joint development plan document to the Secretary of State for independent examination</p> <p>Each Executive / cabinet/ leader/ the City Mayor (depending on each Council's own arrangements and in the event that the Councils have approved the above recommendations)</p>
23/03/21	Planning and Housing Commission	A presentation was given by Head of Planning Strategy GMCA to update the Commission on the Places for Everyone Joint Development Plan Document of nine 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 nine 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 17.1 Collaborative Activity within GMCA Governance

17.2 Neighbouring Authorities

Date	Neighbouring Authorities	Attendees	Summary
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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	Blackburn with Darwen Calderdale Council Cheshire East Council Chorley Borough Council High Peak Borough Council Kirklees Council Warrington Borough Council West Lancashire Council		Email from GMCA sent to duty to co-operate 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.
07/06/2021	Cheshire East; Warrington; St. Helens; West Lancashire; Chorley; Blackburn with Darwen; Rossendale; Calderdale; Kirklees; Derbyshire CC; High Peak; Lancashire CC; Peak District National Park; West Yorkshire Combined Authority		Email sent by TfGM on behalf of the PfE districts reminding neighbouring authorities that the approach to transport evidence supporting the PfE, had been shared with them alongside the updated Transport 2040 5 Year Delivery Plan in December 2020. It stated that " we did publish all of the evidence and supporting documents alongside the draft plan on our website (GMSF 2020 and supporting evidence base) which is still available to view." It provided an update on the position since September 2020 with the departure of Stockport leading to the PfE districts progressing the PfE and stated we want to " alert you to the evidence base that we published in October 2020". It went on to say "In terms of the transport evidence base further modelling on the Strategic Road Network is underway alongside an update of the Locality Assessments which accompany the proposed allocations but the evidence published in October will form a substantial part of the evidence accompanying Places for Everyone.....In advance of the consultation it would be helpful to understand from yourselves whether you have had the

			<p>opportunity to review the October 2020 GMSF and evidence and if so, whether you have any issues/concerns that you would like to raise?.....We would be happy to meet with you if that would be helpful, and /or set up a meeting early in the consultation period to talk through the new plan and any changes to the evidence base."</p>
06/07/21	Cheshire East	GMCA, MCC, TFGM	<p>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. The issues discussed were: co-operation between Cheshire East and PfE districts; PfE timetable; development areas; evidence base; Stockport; cross-boundary transport issues, such as SEMMMs.</p> <p>The SEMMMs Refresh is recognised as a local issue, not a GM wide strategy, TfGM and the GMCA would be supportive of any decision Stockport Metropolitan Borough Council make regarding the need to update the strategy in the future and will work with Stockport to review cross boundary highways issues when Stockport's Local Plan is further developed. Further work may be needed, at that time, in order to collaborate with relevant neighbouring authorities and meet Duty to Cooperate guidelines for their Local Plan.</p>
13/07/21	Chorley	GMCA, MCC, TFGM	<p>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 Strategic Road Network.</p>

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.
2021	M66/A56 Steering Group hosted by Rossendale Council	Rossendale, TfGM, National Highways, Lancashire County Council & Transdev	TfGM attend the quarterly meetings of the M66/A56 Steering Group hosted by Rossendale Council. The PfE/GMSF Plan transport evidence base has been a standing item on the agenda since the group was established in 2017. The group is a forum for the sharing of information, to develop a comprehensive and shared understanding of where transport investment can be maximised to mitigate travel issues on the M66/A57 corridor, to review of progress on agreed partnership working and identify funding opportunities to develop and deliver potential transport interventions. Other attendees include Highways England (National Highways), Lancashire County Council and the Witch Way bus operator Transdev.

Table 17.2 Collaborative Activity with Neighbouring Authorities

17.3 Public 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.
16/03/21	Historic England	Historic England sent an email to the GMCA attaching a commentary on changes to the text of the PfE which they deemed to be fundamental and which they requested could be amended at this Regulation 18 Stage. These were the most critical changes which could impact on the soundness of the Plan. The Table is shown in the Historic England Section 17.5 below.

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.
23/04/21	Historic England	Email from the GMCA to Historic England referring to the 16th March 2021 email indicating that it was possible to make limited changes of the type proposed, whilst enabling the nine districts to proceed to the Regulation 19 stage with PfE. There were a few comments from the PfE districts on the suggested amendments relating to reference to HEA's rather than HIA's and outcomes of discussion between Historic England and Rochdale and these are shown in the Historic England Section 17.5 below.
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 separate Statement of Common Ground.
13/07/21	Historic England	<p>Historic England email to GMCA attaching a table summarising</p> <ul style="list-style-type: none"> • Historic England's comments on the January 2019 draft Greater Manchester Spatial Framework (GMSF); • work undertaken by Greater Manchester Combined Authority (GMCA) following the Regulation 18 consultation; • our consideration of outstanding issues to be resolved, and the risk to soundness that they pose; • suggested solutions to overcome the issues highlighted. <p>They sought GMCA's response to the issues raised by their comments as it would help inform Historic England's response to the publication draft plan during the Regulation 19 stage (The Historic England Table with the PfE Response is set out in Section 18.7).</p>
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.

19/07/21	Highways England	Email to Highways England from TfGM providing a draft of the SofCG relating to Highways England and also making them aware that the transport evidence is available on the GMCA website, alongwith the Transport Topic paper, Strategic Modelling Note, Existing Land Supply and Locality Assessments and Addendum's. Also offering a specific duty to co-operate meeting if required.
27/07/2021	Highways England	Email from SYSTRA to Highways England and WSP attaching work in progress reports relating to the PfE SRN Workstream. These comprise: <ul style="list-style-type: none"> • SRN Workstream Modelling Methodology Report • SRN Workstream Technical Report • SRN Link - Master Sheet

Table 17.3 Collaborative Activity with Duty to Co-operate Bodies

Greater Manchester Highways Strategy Board

Dates	Greater Manchester Highways Strategy Board Attendees
31/03/2021	Greater Manchester Highways Strategy Board met quarterly to discuss transport matters including progress on PfE transport work. Attendees were: TFGM, GMCA.
29/06/2021	Greater Manchester Highways Strategy Board met quarterly to discuss transport matters including progress on PfE transport work. Attendees were: TFGM, GMCA.

Table 17.4 Greater Manchester Highways Strategy Board

Highways England & TfGM Strategic Working Group Meetings

Date	Meeting
12/02/2021	Highways Strategy Board Strategic Working Group
19/03/2021	Highways Strategy Board Strategic Working Group
27/04/2021	Highways Strategy Board Strategic Working Group
15/06/2021	Highways Strategy Board Strategic Working Group
01/09/2021	Highways Strategy Board Strategic Working Group

Date	Meeting
21/10/2021	Highways Strategy Board Strategic Working Group
17/11/2021	Highways Strategy Board Strategic Working Group
10/12/2021	Highways Strategy Board Strategic Working Group

Table 17.5 Highways England & TfGM Strategic Working Group Meetings

Meetings between Highways England, TfGM and PfE Representatives

Dates	Meeting
07/01/2021	SRN Scoping Work for Joint Spatial Framework
14/01/2021	Northern Gateway Update with HE
19/01/2021	SRN Scoping Work for Joint Spatial Framework
26/01/2021	Northern Gateway Technical Work to- date
25/02/2021	Northern Gateway HE Progress Meeting
06/04/2021	PfE (GMSF) SRN Workstream Progress Meeting
21/04/2021	M66 J3 - Next Steps

Table 17.6 Meetings between Highways England, TfGM and PfE Representatives

17.4 Highways England



Highways England
Piccadilly Gate
Store St
Manchester
M1 2WD

Anne Morgan
Greater Manchester Combined Authority
Broadhurst House,
56 Oxford Street,
Manchester,
M1 6EU

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 17.1 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

Picture 17.2 Highways England PfE Letter 17 June 21

17.5 Historic England

Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments



Greater Manchester Spatial Framework
Historic England Suggested Amendments March 2021

The rows below are critical issues that we consider are of the utmost importance for the conservation and enhancement of the historic environment. We would consider their omission fundamental to the plan. We reserve our right to make comments at Regulation 19 stage.			
Chapter/Section	Suggested amendments (<i>in bold italics</i>)	Impact/risk to heritage and to the plan	GMCA/District Response
<p>Evidence Base, HIAs and Site Allocations</p> <p>The plan must properly link the HIAs to the allocations. These provide the evidence that development of sites within the GMSF can be made acceptable with avoidance, minimisation and mitigation of harm.</p>	<p>Suggested wording:</p> <p><i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</i></p> <p><i>Alternatively</i> a footnote may be provided directly referencing the Heritage Impact Assessment undertaken.</p>	<p>Risk to heritage: without integration between the HIA and the Plan, risk that the site allocations develop in a manner that does not safeguard the historic environment. Tying the HIA's to the allocation policies provides clear principles for avoiding, minimising and mitigating harm and identifies opportunities for enhancement where possible and appropriate.</p> <p>Risk to the plan: Site allocations would not be effective (test c) – they provide clarity for decision makers, developers and residents as to how developments may be assessed and delivered in a sustainable form that conserves and enhances the historic environment. The plan would also not be consistent with national policy (test d) – paras 193-197 in terms of harm and mitigation.</p>	<p>The responses to the proposed allocation policy wording changes are provided below.</p> <p>However, as acknowledged by some of HE's proposed wording below, the 2020 evidence base is formed of Historical Environment Assessments (HEAs) which, as appropriate identify various types of mitigation which, as appropriate has been included in the relevant allocation policies. <u>Therefore</u> in the examples where reference is requested to HIAs 2020, this has been amended to either refer to HEAs 2020 and/or the plan evidence.</p> <p>As the strategic level allocations move towards implementation through the</p>

Picture 17.3 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

<p>Chapter 9: Historic Environment</p> <p>Supporting Text</p> <p>Similarities with the sound London Plan policy however the plan includes considerable supporting text which aids delivery.</p> <p>Given the strategic nature of this policy we must highlight that proposed deletion of the</p>	<p>Paragraph 9.11: Greater Manchester has a uniquely diverse cultural heritage represented by its rich and extensive historic and built environment <i>including designated and non-designated heritage assets</i>. Its development...</p> <p>Paragraph 9.12: <i>The conservation and enhancement of the historic environment will start with the preparation and implementation of up-to-date evidence for the historic environment. This evidence will be used to help shape and inform the implementation of planning policies at a Greater Manchester and local plan level through a clear and proper understanding of the heritage significance of a building, site or area and its relationship with its surroundings.</i></p>	<p>Risk to heritage: there are elements of managing change to the historic environment which are missing from the policy such as non-designated heritage assets, archaeology and enhancement of significance.</p> <p>Potential to create a policy vacuum where local plan policies are to be deleted until such time that these plans come forward post-adoption.</p> <p>There is also a lack of local distinctiveness within the policy tying together the key strategic themes for the historic environment set out within the topic paper such as mills, heritage at risk, transport infrastructure. A local list project is underway in Greater Manchester.</p>	<p>development management process, HIAs will be required as identified in the HEAs.</p> <p>It is unclear if HE is requesting a generic bullet point in the text of policy E-2 in the PTE Plan to refer to the HEAs 2020 and/or the PTE evidence base or whether the changes to the allocations as set out below would be sufficient for HE</p>
			<p>Change to the supporting text of E-2 has been made as requested</p>

Picture 17.4 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

historic environment policies for boroughs should not be carried forwards.		Risk to the plan: the policy doesn't provide a positive strategy for the historic environment with key areas of heritage omitted (test a), insufficient detail in the supporting text (test c) and is not consistent with national policy due to <u>choice of</u> wording (test d).	
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Chapter 11: Allocations

We welcome the work that GMCA has undertaken to understand the impact of the allocations on the historic environment. The inclusion of Heritage Impact Assessments within the Plan's evidence base can help to demonstrate that the sites can be developed without harm to the historic environment. They provide an understanding of the significance of the heritage assets and suggest, where appropriate mitigation measures.

We support the principle of all the sites included within the Plan, however we are of the view that the HIA for site GMA 40 (South of Hyde), needs further work to support its inclusion and to ensure that development does not harm the significance of the assets on the site.

Some of the wording, is not NPPF compliant in terms of its references to the historic environment so amendments have been suggested for clarity and soundness. In addition, reference to the HIAs and to any future HIAs have either been included with existing text corrected or suggested new text added.

Amendments

The table below outlines the suggested amendments

Impact/Risk to heritage and to the Plan

Risk to Heritage:

Picture 17.5 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments



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There is a risk without integration between the HIA and the Plan, and a lack of NPPF compliant site policies that the site allocations are developed in a manner that does not safeguard the historic environment. Tying the HIAs to the allocation policies and ensuring the correct wording (NPPF) ensures they are robust and consistent with national policy and provides a level of certainty on deliverability through clear principles for avoiding, minimising and mitigating harm.

Risk to the Plan:

Site allocations would not be effective (test c) – they provide clarity for decision makers, developers and residents as to how developments may be assessed. Not consistent with national policy (test d) – paras 193-197 in terms of harm and mitigation.

Picture 17.6 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

Policy name/number	Amendments	District Agree Y/N	District Comments
GMA1.1 Northern Gateway Heywood/Pillsworth	<p>Bullet 18: add to end of paragraph to tie in current/future HIAs:</p> <p><i>in accordance with the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</i></p>	Yes, but with amendment	<p>Concerned that references to 'Heritage Impact Assessment (2020)' may give the impression that this is a specific document title. Suggest that criterion 18 be revised to read:</p> <p><i>Protect and, where appropriate, enhance heritage assets and their setting within the allocation, including the Brick Farmhouse and Lower Whittle Farmhouse Grade II listed buildings and the wider historic character of the surrounding setting, in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.</i></p>
GMA1.2 Northern Gateway Simister and Bowlee	<p>Bullet 18 should be amended to remove 'within the vicinity of the allocation' (this wording apparently excludes those within the allocation?) and tie in the HIA and future HIAs to read:</p> <p><i>Protect and enhance the heritage and archaeological assets and their setting. Proposals</i></p>	Yes, but with amendment	<p>Concerned that references to 'Heritage Impact Assessment (2020)' may give the impression that this is a specific document title. Suggest that criterion 18 be revised to read:</p> <p><i>Protect and, where appropriate, enhance heritage and archaeological</i></p>

Picture 17.7 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

	should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.		assets and their setting in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.
GMA2 Stakehill	Bullet 4 should be amended to tie in the HIA and ensure that the text is in line with the requirements of the NPPF: Ensure that the design of the scheme preserves or enhances the setting of the listed St John's Church and war memorial in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.	Yes, but with amendment	Use text below (difference shown as tracked change) Ensure that the design of the scheme preserves or enhances the setting of the listed St John's Church and war memorial in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated <u>assessment</u> submitted as part of the planning application process.
GMA3.1 Medipark	Additional line should be added to the end of bullet 7 to tie in HIAs: Proposals should be in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.	N	It would be unusual and unprecedented to be this prescriptive for a specific proposal's requirements in an MCC local plan. However, the historic/heritage assessment recommendations by HE would be considered and addressed through MCC's planning application process
GMA3.2 Timperley Wedge	Bullet 36 should be amended to tie in the HIA and ensure that the text is in line with the requirements of	Y	Agree to HE's proposed wording to provide consistent wording across

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Picture 17.8 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

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	the NPPF:		allocations:
	Conserve and enhance the historic environment in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.		Conserve and enhance the historic environment in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.
GMA7 Elton Reservoir	Additional text should be added to Bullet 17 to tie in the HIA: Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.	Yes, but with amendment	Concerned that references to 'Heritage Impact Assessment (2020)' may give the impression that this is a specific document title. Suggest that criterion 17 be revised to read: <i>Protect and, where appropriate, enhance heritage and archaeological assets and their setting, including the Old Hall Farmhouse Grade II listed building and wider historic character of the surrounding area, in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.</i>
GMA9 Walsbaw	Bullet 16 should be simplified and needs to tie in the heritage impact assessment: Protect and enhance the heritage assets and their setting including the Grade II* Christ Church in accordance with the findings and	Yes, but with amendment	Existing wording was discussed and agreed with Historic England in September 2020. Concerned that references to 'Heritage Impact Assessment (2020)' may give the impression that this is a specific

Picture 17.9 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

	recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.		document title. Suggest that criterion 16 be revised to read: <i>Protect and, where appropriate, enhance heritage assets and their setting, including the Christ Church Grade II* listed building, in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.</i>
GMA12 Beal Valley	Bullet 19 should be amended to clearly tie in the HIA: <i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</i>	Yes, but with amendment	Deleted 'Proposals should' as the policy currently states "Development at this site will be required to: This is considered stronger text and should be maintained. <i>Proposals should be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</i>

Picture 17.10 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PIE District's Comments

GMA14 Broadbent Moss	Bullet 20 should be amended to ensure the HIA is tied in: <i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</i>	Yes, but with amendment	Deleted 'Proposals should' as the policy currently states 'Development at this site <u>will be required to:</u> ' This is considered stronger text and should be maintained. <i>Proposals should be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</i>
GMA15 Chew Brook Vale	Bullet 20 should be amended to ensure the HIA is tied in: <i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</i>	Yes, but with amendment	Deleted 'Proposals should' as the policy currently states 'Development at this site <u>will be required to:</u> ' This is considered stronger text and should be maintained. <i>Proposals should be informed by the findings and recommendations of the Historic Environment</i>

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Picture 17.11 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

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	to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;		Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;
GMA16 Cowlshaw	Bullet 14 should be amended to ensure the HIA is tied in: Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;	Yes, but with amendment	Deleted 'Proposals should' as the policy currently states "Development at this site <u>will be required to</u> ." This is considered stronger text and should be maintained. Proposals should be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;
GMA17 Hanging Chadder	Bullet 16 should be amended to ensure the HIA is tied in;	N/A	Site removed from the PfE plan

Picture 17.12 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PfE District's Comments

GMA20 Bamford and Norden	<p>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;</p> <p>Additional text should be inserted into Bullet 10 to tie in the HIA:</p> <p>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</p>	Yes, but with amendment	<p>Proposals should be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated assessment submitted as part of the planning application process.</p>	Author Deleted: Heritage Impact Assessment Author Deleted: HIA
GMA22 Crumble Mill	<p>Bullet 2 and 3 should be amended to tie in the HIA and ensure that the text is in line with the requirements of the NPPF.</p> <p>In addition, the Policy could be simplified for clarity:</p> <p>2. Protect and enhance the significance of the mill complex in order to secure the long-term future of these heritage assets at risk. Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA</p>	<p>Yes but for bullet 2 needs amendments to reflect discussions and agreement with HE in October 2020.</p> <p>Suggested amendment to bullet 3 is fine</p>	<p>2. Protect and enhance the character and significance of the mill complex in order to secure the long-term future of these nationally significant Listed Buildings. This will include detailed masterplanning to be informed by the Crumble Mill Historic Environment Assessment 2020;</p>	Author Deleted: Heritage Impact Assessment Author Deleted: HIA

	<p>submitted as part of the planning application process. This will include detailed masterplanning to avoid development in areas of high sensitivity as defined by the HIA.</p> <p>3. Define the archaeological potential of the development site to the south of the mill complex and river through the completion of archaeological evaluation in the form of geophysics, field walking and trial trenching for areas specified in the Historic Environment Assessment (2020). The masterplan must detail where significant archaeology will be preserved in situ.</p>	Yes, but with amendment	Bullet 3 is fine as suggested
GMA25 Roch Valley	<p>Bullet 5 should be amended to tie in the HIA and ensure that the text is in line with the requirements of the NPPF. In addition, the Policy could be simplified for clarity:</p> <p>Protect and enhance archaeological features and where appropriate carry out archaeological evaluation for areas specified in the Roch Valley Historic Environment Assessment 2020 to understand where especially significant archaeology must be preserved in situ. Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</p>	Use text below (difference shown as tracked change)	<p>Protect and enhance archaeological features and where appropriate carry out archaeological evaluation for areas specified in the Roch Valley Historic Environment Assessment 2020 to understand where especially significant archaeology must be preserved in situ. Proposals should be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated assessment submitted as part of the planning application</p>

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Picture 17.14 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PIE District's Comments

			process.
GMA28 East of Boothstown	Bullet 18 should be amended to ensure the HIA is tied in: <i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</i>	Yes, but with amendment	Bullet 18 should be amended so that it reads as follows: "Conserve and enhance the setting of nearby heritage assets; and informed by the findings and recommendations of the Heritage Assessment (2019) in the Plan's evidence base and any Heritage Impact Assessment submitted as part of the planning application process. and"
GMA30 Port of Salford Extension	An additional bullet point should be added to Bullet 9 to tie in the HIA: <i>Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</i>	Yes, but with amendment	Bullet 10 of GMA30 should be amended so that it reads as follows: "Conserve and where appropriate enhance, the significance of surrounding designated and non-designated heritage assets, including by: i. Designing and landscaping the development to minimise any adverse impacts on the setting of Barton Aerodrome and the listed buildings within it; and

GMA40 South Of Hyde	<p>We understand the HIA has been prepared as part of the evidence base to justify the allocation. The HIA defines areas of significance and sets out a number of recommendations for development to retain the rural setting. At a point, prior to adoption of the local plan, we suggest the HIA could be enhanced to better reflect understanding of significance and recommend solutions to fully take account of heritage assets within the allocation.</p> <p>Amendments recommended to tie in HIA and make NPPF compliant.</p>	Yes, but with amendment to bullet point 11	<p>ii. Where harm to Barton Aerodrome and any heritage asset within it is justified, opportunities shall be sought to better reveal the significance of the heritage asset, securing repairs to them, improving public access to them and/or providing publicly accessible information about them; and</p> <p>iii. Being informed by the findings and recommendations of the Heritage Assessment (2019) in the Plan's evidence base and any Heritage Impact Assessment submitted as part of the planning application process."</p> <p>11. Proposals should be informed by the findings and recommendations of the Heritage Impact Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA assessment(s) submitted as part of the planning application process.</p>
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	<p>10. Sustain and enhance both designated and non-designated heritage assets and their settings including the Grade II* listed <u>Apethorn Farmhouse</u> and Grade II Pole Bank Hall.</p> <p>11. Proposals should be informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</p> <p>12. There will be a requirement to deliver the sensitive restoration and, long term future use of the Grade II* listed <u>Apethorn Farmhouse</u> and complex within an early phase of development together with its removal from the Heritage at Risk Register;</p>	Yes, but with amendment	Propose using the same wording as requested for GMA 3.2 (above): Conserve and enhance the historic environment in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.
GMA41 New Carrington	<p>Bullet 43 should be amended to tie in the HIA and make it NPPF compliant.</p> <p>Positively conserve and enhance all aspects of the historic environment informed by the findings and recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.</p>	Yes, but with amendment	9. Ensure that the heritage setting of the Grade II Listed Fair House Farmhouse on Pocket Nook Lane is retained or enhanced. Proposals should be informed by the findings and
GMA44 Pocket Nook	<p>Bullet 9 should be amended to tie in the HIA and make it NPPF compliant.</p> <p>Proposals should be informed by the findings and</p>		



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	recommendations of the Heritage Impact Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process.		recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated assessment(s) submitted as part of the planning application process.
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Picture 17.18 Historic England's Suggested Revisions to the Regulation 18 Text with GMCA/PIE District's Comments

17.6 Stockport Council

Date	Attendees	Summary	Actions
27/01/21	TfGM Stockport Salford Stockport Systra Manchester Wigan Rochdale GMCA	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	Stockport, GMCA, MCC, TFGM	The issues discussed were: how to progress Duty to co-Operate relationship; evidence base; Statement of Common Ground	
03/03/21	Stockport	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	TfGM Stockport Salford Stockport Systra	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 to agree approach with Systra through LA Review. Proposal to be shared with Stockport. Update to be provided at GM Planning Officers Group. GMCA to

	Manchester Wigan Rochdale GMCA)	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.	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	Stockport	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. The PFE districts also stated that as part of preparing the PFE Plan they are in the process of contacting all their neighbouring authorities again to explore any previously unidentified potential to meet the unmet need. The letter requested whether Stockport would have the capacity to accommodate any of the Places for Everyone housing growth.	
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.	
26/05/2021	TfGM, Stockport	Email from TfGM attaching the Locality Assessments close to the Stockport boundary. It was explained that these are currently being reviewed following Stockport's departure from the GMSF.	
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 17.7 Collaborative Activity with Stockport Council

17.6.1 Collaboration Between PfE districts and Stockport MBC

Transport Modelling

17.1 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

17.2 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



STOCKPORT
METROPOLITAN BOROUGH COUNCIL

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 17.19 Letter from Stockport to the GMCA dated 3 March 2021

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

GMCA | Broadhurst House | 56 Oxford Street | Manchester | M1 6EU

Picture 17.20 Letter from GMCA to Stockport dated 19 April 21



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 handwritten signature in dark ink, appearing to read 'A. Morgan'.

Anne Morgan
Head of Planning Strategy
Greater Manchester Combined Authority

GMCA | Broadhurst House | 56 Oxford Street | Manchester | M1 6EU

Picture 17.21 Letter from GMCA to Stockport dated 19 April 21

Letter from PfE representatives to Stockport MBC on 11th June 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

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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Picture 17.22 Letter from PfE representatives to Stockport MBC on 11th June 2021



- 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 \(greatermanchester-ca.gov.uk\)](https://www.greatermanchester-ca.gov.uk/gmsf-publication-plan-2020)

[Supporting documents - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](https://www.greatermanchester-ca.gov.uk/supporting-documents-greater-manchester-combined-authority)

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, as well as any needs that cannot be met within neighbouring areas (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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Picture 17.23 Letter from PfE representatives to Stockport MBC on 11th June 2021



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,

A handwritten signature in dark ink, appearing to read 'A. Morgan'.

Anne Morgan
Head of Planning Strategy
Greater Manchester Combined Authority

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Picture 17.24 Letter from PfE representatives to Stockport MBC on 11th June 2021

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



Councillor Elise Wilson
Leader of Stockport Council

26 July 2021

Ref: AM

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 co-operating 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 Co-operate 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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<u>BOLTON</u>	<u>MANCHESTER</u>	<u>ROCHDALE</u>	<u>STOCKPORT</u>	<u>TRAFFORD</u>
<u>BURY</u>	<u>OLDHAM</u>	<u>SALFORD</u>	<u>TAMESIDE</u>	<u>WIGAN</u>

Picture 17.25 Letter from Greater Manchester Mayor Andy Burnham and Mayor Paul Dennett to Cllr Elise Wilson
from Stockport 26 Jul 21

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



Paul Dennett
City Mayor of Salford, GMCA Portfolio Lead

Picture 17.26 Letter from Greater Manchester Mayor Andy Burnham and Mayor Paul Dennett to Cllr Elise Wilson from Stockport 26 Jul 21

18 Submission Places for Everyone - August 2021 to February 2022

18.1 Duty to Co-operate responses to Consultation

Organisation	Comments
Cheshire West & Chester (CWaC)	<p>Minerals</p> <ul style="list-style-type: none"> Places for Everyone (PfE) lacks minerals policies, and lack of evidence on mineral supply to support the proposed levels of development. This means it is difficult to judge if the plan is sound. An update of the GM minerals plan is required. CW&C is a key supplier of aggregates to GM. They are concerned that increased development will impose an unacceptable burden on their district. They are particularly concerned about sand and gravel. They would like to be a signatory on the Minerals Statement of Common Ground (SoCG) and be part of further discussions. <p>Waste</p> <ul style="list-style-type: none"> PfE has a 'lack of waste policies' and 'lack of waste evidence', meaning it is difficult to judge if the plan is sound. There is concern about a lack of evidence showing sufficient capacity within the Greater Manchester area for recycling, treatment and disposal of waste. The GM Waste Development Plan requires an update. CWaC would like reassurance that there will not be a significant increase in export of waste to the CWaC area. They would like to be a signatory on any Waste SoCG. They request reassurance that lack of provision for Gypsies and Travellers will not result in increased demand in their area.
Chorley Council	<ul style="list-style-type: none"> Concerned about integration of transport between Chorley/Central Lancashire and GM. Requested

Organisation	Comments
	<p>ongoing engagement, particularly around public transport reforms affecting cross boundary services.</p> <ul style="list-style-type: none"> • They are unable to take on any unmet housing need, and welcome GM meeting their own housing need. • It should be clarified in the SoCG that PfE is not covering provision for gypsies, travellers and showpeople, and that this will be for each district to pick this up along with a review of the GMGTAA.
Environment Agency	<ul style="list-style-type: none"> • Consider PfE sound for matters within their remit. • Regarding the Strategic Flood Risk Assessment; national climate change guidance and allowances were changed in July 2021. The current SFRA assessments should still represent a reasonable reflection of risks when compared against the updated climate change guidance (July 2021) and is an appropriate approach based on the evidence available at the time.'
Historic England	<ul style="list-style-type: none"> • Concerned by 'the under recognition of the importance of heritage' and emphasise the need for the plan 'to set out a positive strategy for the conservation and enjoyment of the historic environment' (NPPF paragraph 190). • The vision, objectives, strategy, and other policies do not properly recognise the role that the historic environment can play in line with the requirements of the NPPF. • The vision does not refer to the historic environment, and the objectives are weak on this matter. This does not set an appropriate framework for the rest of the plan, in that heritage is not to be considered to be a strategic matter alongside other priorities; • Some of the policies within the strategy section fail to recognise the role that the historic environment can play in achieving the goals of the plan across the sub-areas. The historic environment is not given equal footing with other matters. • The sustainable development policy is too narrow focusing on climate change and brownfield development rather than its wider context.

Organisation	Comments
	<ul style="list-style-type: none"> • The carbon, flood risk and resilience policies need to be worded more carefully to be compatible with the conservation and enhancement of the historic environment. • The Places for Jobs section does not adequately recognise the role that the historic environment in the economy of the area, including in creativity/digital industries, tourism, and 'the vast opportunity presented by the legacy of former mill stock in supporting the needs for employment'. • The Places for Homes section does not reflect the updated NPPF which places a much greater emphasis on design quality of which heritage is a crucial aspect. • The plan stops short of settlements in the landscape policy and therefore fails to recognise the importance of urban landscape character within the Greener Places section. There is also a lack of recognition of the importance of planned green spaces including historic parks, gardens and cemeteries. The policies on lowland, wetlands and mosslands and uplands should be revised to ensure that there is compatibility between different environmental objectives such as nature recovery and archaeology. • Generally support policies in the Places for People section albeit with suggested minor wording changes. • Support the majority of allocated sites, which now refer back to the Heritage Impact Assessments prepared as part of the evidence base. • Detailed comments on the policies and text in the plan were provided in a Table.
Homes England	<ul style="list-style-type: none"> • Seeking an amendment to the Duty to Co-operate Statement and Log of Collaboration with regard to the reference to their support for the GMSF. • Do not wish to be a signatory to the SoCG as they do not comment on specific policies.
Liverpool City Region	<ul style="list-style-type: none"> • Welcome GM's approach to spatial planning

Organisation	Comments
	<ul style="list-style-type: none"> • Welcome references to the importance of connectivity to Liverpool and also Leeds, by NPR/HS2 and the M62. • Supports references (particularly in policy JP-J1, and the key diagram) to Liverpool 2 / the Port of Liverpool and Green & Blue Infrastructure • Committed to ongoing joint working.
National Highways	<ul style="list-style-type: none"> • National Highways submitted comprehensive comments to the PfE Publication Plan. They commented on the thematic policies and allocations. In summary, they stated "It is considered that the transport evidence provided at this stage is insufficient to be able to inform National Highways of the impact of the plan proposals at the SRN, at both an individual site allocations level, and on a cumulative basis."
Natural England	<ul style="list-style-type: none"> • Natural England stated PfE was a sound plan but raised concerns about developing on peat particularly in relation to JPA33 New Carrington, JPA29 Port Salford Extension and JPA28 North of Irlam Station. They do not support the principle of developing on peat and have concerns regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA. • Habitat Regulation Assessment – NE referred to the Air Quality Assessment report which concluded that an Appropriate Assessment was required and at the time, it was incomplete and the scale of impacts unknown. Also the availability of appropriate mitigation was unknown. Natural England stated: "Without this information it is not possible for PfE HRA to conclude that there will be no adverse impact on site integrity as a result of delivering the proposed growth in the Plan and the allocations are at risk of

Organisation	Comments
	<p>becoming undeliverable if the Habitats Regulations cannot be satisfied.</p> <ul style="list-style-type: none"> Recreational Disturbance to the Peak District Moors (South Pennine Moors Phase 1) Special Protected Area. The HRA has identified potential effects in relation to in-combination recreational impacts on the Peak District Moors. Natural England's view is that the recommended mitigation measures require strengthening and the site allocation policies in the Plan need to reflect the measures proposed in the HRA.
NHS Property Services	<ul style="list-style-type: none"> Policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate. The Places for Everyone Plan would be improved if Policy JP-P 6 ensured that Health had access to a more equitable share of developer contributions. This should be at a level to support investment in all forms of healthcare provision to meet the demands of housing growth across Greater Manchester, including primary, secondary, and mental health services. Whilst the Policy JP-P 6 includes strategic health policy, it should also stipulate that there should be increased access to developer contributions for health within the Places for Everyone Plan.
Peak District National Park Authority	<ul style="list-style-type: none"> Peak District National Park sought a number of references to the National Park within the PfE to give it more prominence. They also welcome a number of changes to the Chew Brook Vale allocation in response to their previous comments. They wish to continue working with Oldham Borough Council particularly on the development and

Organisation	Comments
	<p>implementation of a Visitor Management Plan for the site.</p> <ul style="list-style-type: none"> • They also made a number of comments on transport accessibility and approach to affordable housing.
St Helens Council	<ul style="list-style-type: none"> • They welcome GM meeting its own development needs for housing and employment land. • They request joint working regarding M6 junction 23. • Allocation JPA 36 'Pocket Nook' should not negatively impact nearby settlements and infrastructure within St Helens borough.
West Lancashire Borough Council	<ul style="list-style-type: none"> • They view PfE as a sound plan, and support its aspirations and proposals. • Consider that GMCA has liaised appropriately with WLBC throughout the process of preparing PfE. • Strongly request PfE acknowledges the proposed rail link to Skelmersdale and mentions these proposals in the plan. This is to help support funding bids.

Table 18.1 Duty to Co-operate Bodies Responses to Publication PfE

18.2 PfE Governance

Date	Governance	Summary of Reports
22nd September 2021	GM Local Enterprise Partnership	<p>To update the LEP members on the progress of Places for Everyone Publication Plan 2021.</p> <p>Agree that the draft Duty to Co-operate/Statement of Common Ground accurately represents the position of the Local Enterprise Partnership and to authorise the Chair to sign the Statement of Common Ground on behalf of the LEP.</p>

1st October 2021	GM Natural Capital Group	<p>To update the Natural Capital Group members on the progress of Places for Everyone Publication Plan 2021.</p> <p>Agree that the draft Duty to Co-operate/Statement of Common Ground accurately represents the position of the Natural Capital Group and to authorise the Chair to sign the Statement of Common Ground on behalf of the NCP.</p>
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Table 18.2 Collaborative Activity with GMCA Governance

18.3 Neighbouring Authorities

Date	Neighbouring Authorities	Summary
13th August 2021	<p>Email from GMCA to</p> <ul style="list-style-type: none"> • Warrington • Peak District National Park • Liverpool City Region • Lancashire County Council • Chorley • High Peak • St Helens • Calderdale • West Lancs • Derbyshire • Cheshire East • Blackburn with Darwen • Stockport • Kirklees • Rossendale • West Yorks • Cheshire East 	<p>Email sent to neighbouring authorities attaching an Individual Log of Collaboration summarising all the duty to co-operate activity to date and attaching a note on cross boundary traffic flows. It also provided a link to the PfE Statement of Common Ground and the Duty to Co-operate Statement & Log of Collaboration. It also offered to meet with neighbouring authorities if they wished to discuss further duty to co-operate matters.</p>
September 2021	Cheshire East	<p>Email exchange between Cheshire East and GMCA following 13th August email as set out above, relating to minerals and cross boundary transport particularly relating to SEMMMs and cross boundary flows. Sought amendments to the Statement of Common Ground, DoC statement and Log of Collaboration.</p>

23rd September 2021	Warrington	<p>Meeting with Warrington Council attendees included GMCA, MCC (as PfE DtoCo Lead), TfGM, Salford, Trafford, Wigan.</p> <p>GMCA provided an update on PfE, current Reg 19 consultation, with submission expected January 2022.</p> <p>Warrington provided an update on their local plan, which included Reg 19 consultation, plan period until 2038 and anticipated adoption in 2023. - WBC presented a summary of the key changes that have been made from the previous version of the Plan which was consulted on in 2019. WBC are not proposing any major allocations in proximity to any of the GM Boroughs.</p> <p>Wigan requested a meeting to discuss the findings of the Local Plan Transport Model report to understand any implications on the motorway / strategic road network.</p>
27th September 2021	Stockport MBC	<p>Meeting between Stockport and GMCA with MCC (as PfE Duty to Co Lead) to discuss</p> <ul style="list-style-type: none"> • Stockport Local Plan Timetable • PfE Statement of Common Ground and timing of signatures to reach mid December target date.
28th September 2021	<p>West Yorkshire Combined Authority</p> <p>Kirklees Council</p> <p>Calderdale Council</p>	<p>Presentation given covering Overview of PfE, timetable, transport modelling, HRA and Duty to Co-operate/Statement of Common Ground. Attendees West Yorkshire Combined Authority, Kirklees, Calderdale, GMCA, TfGM, Oldham, Rochdale and Tameside.</p> <p>Discussion covered M62, HRA, Transport Modelling Data and Statement of Common Ground.</p> <p>WYCA & Calderdale asked what data and information from the Transport Modelling had been shared with Highways England (National Highways) demonstrating impact on the M62.</p>

		<p>TfGM confirmed data relating to impact of growth on the M62 had been shared with Highways England (National Highways).</p> <p>Kirklees sought data from the transport modelling on the A640, A635 and A62 and TfGM agreed to provide this data.</p>
29th September 2021	West Yorkshire Combined Authority	Email exchange with TfGM regarding traffic flow reports on the M62.
30th September 2021	Cheshire West and Chester	<p>Presentation given by GMCA covered- Statement of Common Ground & Log of Collaboration, PfE Timetable, Overview of PfE & evidence base. Attendees GMCA, MCC (as PfE Duty to Co Lead), Trafford and Salford.</p> <p>Discussion covered Minerals & Waste, Sub-regional transport links, Manchester Ship Canal, Approach to HRA, Cheshire West & Chester Local Plan Update.</p> <p>CW&C raised concerns about planned growth through PfE on demand for minerals and how this might impact on CW & C. They are seeking reassurance that this will be explored further and wording in the SoCG reflecting a commitment to consider this matter in the future.</p> <p>Waste – a similar point was made about waste but also reflecting the move to a more circular economy and the need to understand changes in waste flows and disposal.</p> <p>Collaboration takes place with CW & C as a minerals and waste authority.</p>
7th October 2021	Kirklees	Email from TfGM to Kirklees following discussion on 28th September 2021 with requested Cross Boundary Flows attached.

19th October 2021	Kirklees	<p>Email from Kirklees confirming receipt of detailed modelling information related to cross boundary impacts. Kirklees are satisfied that the implications are not severe on the road network.</p> <p>Also request a list of Statements in the SofCG to sign as not all are relevant.</p>
25th October 2021	West Yorkshire Combined Authority	Email asking when the updated SofCG would be available and explaining the route to collect a signature is through the WYCA Place, Regeneration and Housing Committee on 25th November followed by Full Combined Authority meeting 5th December 2021.
28th October 2021	Kirklees	Email informing GMCA that Kirklees Portfolio Holder Briefing takes place week commencing 22nd November and that they are hoping to take the PfE SofCG to the briefing and asking for an updated version of the SoCG.
5th November 2021	West Lancashire	<p>Email from West Lancashire confirming that their Cabinet approved a report that recommended the Leader of West Lancashire sign the Statement of Common Ground.</p> <p>The email also raised the issue of the letter to the Mayor of Greater Manchester regarding the Skelmersdale Rail proposals.</p>
10th November 2021	West Lancashire	Email from West Lancashire with signed PfE Statement of Common Ground attached, see Section 18.8 below.
10th November 2021	West Yorkshire Combined Authority	Email response from TfGM (on behalf of the PfE districts) to points raised about tackling climate change in the plan and how the transport modelling considered CO2.
15th November 2021	St Helens	<p>Meeting with St Helens to discuss PfE update, timetable, St Helens Local Plan, and St Helens comments relating to M6 J23.</p> <p>Attended by St Helens, Wigan, GMCA, TfGM and MCC (as PfE Duty to Co Lead).</p>

		<p>St. Helens Local Plan Submission took place in October 2020, with public hearings in May/June 2021. Main mods went to Cabinet on 10th November 2021 and have been approved for consultation, alongside extension of the plan to 2037.</p> <p>Wigan set out the evidence around Pocket Nook in terms of the Locality Assessment and negligible impact on M6/J23. They also provided an update on community and service needs generated by Pocket Nook and stated this will be largely served within Wigan (Lowton), with a negligible impact on St Helens. Wigan agreed to send details of evidence related to Pocket Nook and the impact on the highway capacity at M6 Junction 23 and also its potential impact on local infrastructure and services within nearby settlements in St Helens Borough.</p> <p>Various issues relating to the future of the M6/J23 were discussed including planned meetings between St Helens and Wigan. A commitment was given for continued joint working on this matter.</p> <p>PfE districts (GMCA) are seeking signatures to the Sof CG by mid December 2021 to enable Submission documentation to be prepared.</p>
15th November 2021	Email from Wigan to St. Helens	Wigan sent an email to St Helens on 15th November to provide an update on the evidence supporting the allocation of Pocket Nook, particularly transport.
22nd November 2021	Kirklees West Yorkshire Combined Authority (WYCA)	<p>Email to Kirklees and WYCA attaching the updated PfE Statement of Common Ground.</p> <p>The email explained that the title still referred to the Publication version of SofCG and as it was being prepared in Objective needed technical input to be updated. However, due to the urgency of the request for the SofCG</p>

		and the opportunity to collect relevant signatures, it was being sent before the Title has been updated.
29th November 2021	Blackburn with Darwen Calderdale Chorley Derbyshire County Council High Peak Borough Council Lancashire County Council Rossendale St Helens Warrington	Email to various neighbouring local authorities attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet, see Section 18.8. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements. It sought signatures by the end of December 2021.
2nd December 2021	Kirklees	Email from Kirklees with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
2nd December 2021	Peak District National Park Authority	Email to the Peak District National Park Authority attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements. It sought signatures by the end of December 2021.
3rd December 2021	Stockport MBC	Letter dated 3rd December 2021, sent from Mayor of Greater Manchester Andy Burnham and City Mayor of Salford Paul Dennett to

		<p>Leader of Stockport Council - Cllr Elise Wilson. Full details of the letter are set out in the section 18.6 below.</p> <p>It acknowledged Stockport's letter dated 21st October 2021 in response to their letter 26th July 2021.</p> <p>It noted Stockport's request that consideration be given to Stockport's unmet need being accommodated in PfE but confirmed that these discussion could not take place on a confidential basis. The letter explained they intend to respect the request for confidentiality in connection with the details contained within the letter of 21 October, but the response as set out in this letter will form part of the suite of documents to be submitted to the Secretary of State with the Places for Everyone publication plan.</p> <p>The letter stated "We are unable to consider your request to meet Stockport's unmet need in Places for Everyone in the absence of an explanation from you as to why Stockport cannot meet its own objectively assessed need in full. In order for us to consider further, we require you to provide a detailed assessment of capacity, including the proposed plan period, local housing need figure, the updated land supply evidence and a detailed justification with particular reference to the criteria in NPPF paragraph 11(b). Please also confirm the current timeframe for commencing Regulation 18 consultation in respect of Stockport's local plan."</p>
13th December 2021	Cheshire East Cheshire West & Chester	Email to various neighbouring local authorities attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet, see Section 18.8 below. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to

		<p>Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements.</p> <p>It sought signatures by the end of December 2021.</p>
13th December 2021	Peak District National Park Authority	Email from the Peak District National Park Authority with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
14th December 2021	Stockport MBC	<p>Email from MCC (PfE DtoCo Lead) to Stockport attaching the PfE SofCG and Stockport's Individual Log of Collaboration and Signing Sheet. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements.</p> <p>It sought signatures by the end of December 2021.</p>
15th December 2022	Stockport	<p>Meeting requested by Stockport to discuss Bredbury Appeal, Godley Green planning application, Stockport Local Plan, PfE Statement of Common Ground. Attended by Stockport, GMCA, TfGM and MCC (as PfE Duty to Co Lead).</p> <p>Bredbury Appeal hearings commencing early February 2022. Discussed whether there were any PfE issues being raised at Appeal. These mainly relate to the planning history/ context of the site and that objections were made to the site when it was in the GMSF.</p>

		<p>Discussed the planning application relating to Godley Green. It was acknowledged that the transport modelling to support a strategic development plan, such as the PfE, was different to that needed for a planning application. This is recognised in the PfE in JP-C7 Transport Requirements of New Development to be accompanied by a TA/ TS and Travel Plan at planning application stage.</p> <p>Both sides agreed that the scope of the PfE locality assessments is clearly set out and reflected in the PfE Plan. As such it was agreed to have further discussion(s), separate to those in relation to the production of the PfE or the Stockport Local Plan, to discuss issues arising out of the current planning application at Godley Green.</p> <p>Update on the Stockport Local Plan Timetable and reissued Local Development Scheme – Preferred Options Summer/Autumn 2022; Publication Summer/Autumn 2023; Winter 2023/2024; and Adoption Autumn 2024. It was described as a “hybrid Local Plan” with options, where required.</p> <p>Stockport acknowledged that although the issues would be broadly similar to those identified in the PfE Statement of Common Ground, as part of their local plan preparation, they needed to identify what they considered to be the strategic cross boundary issues which relate to the PfE districts and Stockport. As such, Stockport committed to writing to the PfE districts to set these out.</p> <p>Stockport stated the SHLAA update is expected mid to late January 2022.</p> <p>An update was provided on the PfE Statement of Common Ground. Stockport received a draft of the PfE SofCG during the PfE Reg 19 consultation. As with other neighbouring authorities Stockport have received an updated version of the document since the</p>
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		<p>consultation closed and have been asked to provide a signed copy of the SoCG by the end of December 2021. It was explained that the revised SoCG was broadly the same as the one circulated in August.</p> <p>The GMCA explained the approach to collaboration had been through the Governance structure of the Joint GMCA/AGMA and subsequent Joint Committee. Despite Stockport no longer being part of the PfE, the PfE districts and Stockport were collaborating through a variety of means including all being members of the GMCA, GM LEP, GM Natural Capital Group & TfGM. Also, most of the evidence base was developed through collaborative involvement with Stockport when they were part of the GMSF. Plus, there was significant duty to co-operate activity since December 2020 which is set out in the SofCG and Duty to Co-operate Statement and Log of Collaboration. The SofCG has a Signing Sheet which identifies the “Statements” relevant to Stockport. Stockport colleagues indicated that they would need time to review the document before responding and it was unlikely that they would be able to provide a signed document before January 2022. Given this likely delay in signing the document, Stockport colleagues were asked if they could identify those matters which could be signed sooner than later and those which may require more discussion, as this would assist the timely preparation of the PfE Submission documentation.</p> <p>The GMCA reminded Stockport that they are yet to respond to the formal request asking if they are able to accommodate any of the PfE’s unmet need. A previous formal request was made to all neighbouring authorities including Stockport</p>
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		<p>Also, discussed was the Schedule of evidence jointly prepared in support of the GMSF (as attached to this note), which Stockport intends to use to support their Local Plan preparation.</p> <p>The Proforma of the meeting is attached in section 18.6 below.</p>
16th December 2021	Cheshire West & Chester	<p>Cheshire West and Chester sent an email setting out their reasons for not signing the SofCG.</p> <p>In relation to minerals and waste they state the PfE SoCG doesn't deal fully with their concerns.</p> <p>They are concerned that the lack of consideration of minerals supply within PfE or an updated version of the Minerals Local Plan could result in additional future demands on aggregate supplies from CWaC and could mean that development set out in PfE is not deliverable.</p> <p>They sought assurances within the SoCG that the site allocations within the PfE take account of the presence of minerals (specifically aggregate sand and gravel).</p> <p>They state identification within SoCG that there will be collaboration and further consideration of the issue is also welcomed, but we would also request that within SoCG a timetable is provided for this review, or at least a start date and commitment to an early review.</p> <p>They also request to be considered a duty to co-operate body.</p>
17th December 2021	Warrington	<p>Meeting with WBC attended by GMCA and MCC (as PfE DtoCo Lead) confirmed that given there are no major concerns regarding the location and nature of allocations in the</p>

		Manchester Plan, and given the overview of transport evidence base given to WBC by TfGM, WBC does not consider it necessary to carry out a detailed review of TfGM's transport evidence ahead of the submission of the Plan.
17th December 2021	Blackburn with Darwen Calderdale Cheshire East Chorley Derbyshire County Council High Peak BC Lancashire County Council Liverpool City Region Rossendale BC St. Helens,	Email from the PfE districts reminding neighbouring authorities of the request to sign the PfE Statement of Common Ground Signing Sheet by the end of December 2021. Attached was a PfE Statement of Common Ground.
20th December 2021	Blackburn with Darwen	Email from Blackburn with Darwen with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
21st December 2021	Rossendale BC	Email from Rossendale to the GMCA seeking reference to the M66/A56 Steering Group meetings and an additional sentence to be added to paragraph 14.36 relating to Rossendale's ongoing discussions for a rail link between Rawtenstall and Manchester via Ramsbottom - called the Valley City Link.
21st December 2021	Cheshire East	Email from Cheshire East with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
21st December 2021	Stockport	Email from MCC (PfE DtoCo Lead) attaching a note of the Duty to Co-operate meeting 15th December 2021 and seeking any amends or comments on the note.

6th January 2022	Chorley	Email from Chorley Council with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
7th January 2022	Calderdale	Email from Calderdale Council with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
10th January 2022	Derbyshire County Council High Peak BC Liverpool City Region Lancashire County Council Rossendale Stockport MBC St. Helens Warrington	A reminder email from the PfE districts explaining the PfE Plan is being prepared for Submission at the end of January and requesting signatures to the PfE Statement of Common Ground by 21st January 2022.
10th January 2022	Rossendale	Telephone discussion between Rossendale and MCC (DtoCo Lead) on way forward to accommodate their comments of 21st December 2021. Follow up email with amended PfE SofCG relating to the City Valley Link. Update on contact with TfGM seeking information on the M66/A56 Steering Group Meeting, which once received will be added to the Log of Collaboration.
10th January 2022	Lancashire County Council	Email from Lancashire County Council with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
10th January 2022	Stockport MBC	An email reminder was sent to Stockport explaining the Proforma of 15th December meeting will form part of the Log of Collaboration and the schedule of evidence

		will be attached. It sought comments from Stockport on the Proforma by 21st January 2022.
11th January 2022	High Peak BC	Email from High Peak BC with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
12th January 2022	Derbyshire County Council	Email from Derbyshire County Council with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
12th January 2022	St. Helens	Email from St Helens seeking an amendment to the reference in the penultimate bullet point to paragraph 7.4 referring to the M6 Junction 23 Feasibility Study and the purpose of the study to examine growth more generally.
13th January 2022	Liverpool City Region	Email from Liverpool City Region with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
13th January 2022	Stockport MBC	Email from Stockport indicating they are reviewing the Proforma of the meeting 15th December 2022 but if they don't get comments to the GMCA by 21st January 2022 this does not indicate Stockport have no comments.
14th January 2022	Warrington	Email from Warrington seeking an update to the Log of Collaboration relating to the level of detail that Warrington reviewed the transport evidence. Also raised Natural England's concerns about the combined effect of our respective Plans on the Holcroft Moss, within the wider Great Manchester Nature Improvement Area, but located in Warrington. Colleagues in Warrington are liaising with colleagues at the GMCA on this. and seeking to ensure the Warrington HRA is consistent with the PfE HRA.
14th January 2022	Warrington	Telephone conversation confirming amendments to the Log of Collaboration as requested. Also discussed the Great Manchester Nature Improvement Area and

		Natural England's comments regarding the combined effect of the PfE Plan and the Warrington Local Plan on the Holcroft Moss within the wider Great Manchester Nature Improvement Area.
14th January 2022	Warrington	Email from MCC (PfE DtoCo Lead) attaching the latest version of the Duty to Co-operate Statement and Log of Collaboration and the Warrington Signing Sheet, which included the added record of the meeting of 17th December 2021. Also, attached is the latest PfE Submission Statement of Common Ground with the revised wording relating to the Habitat Regulation Assessment and the reference to assessing the in-combination effect on air quality from the PfE with Warrington BC Local Plan for the Manchester Mosses SAC.
20th January 2022	Cheshire West & Chester	<p>Meeting with CWaC attended by GMCA and MCC (as PfE DtoCO Lead) to discuss their comments, set out their email dated 16th December 2021.</p> <p>The email dated 16th December 2021, indicated CWaC could not sign the SofCG in terms of the single Statement of relevance - Minerals and Waste. In the email they sought to be recognised as a Duty to Co-operate Body.</p> <p>The PfE representatives explained that the strategic matters identified for the PfE Plan are set out in paragraph 1.26 of the Publication PfE Plan. They relate to housing and employment but also the identification of environmental assets, infrastructure delivery and a new Green Belt boundary. Early stages of evidence gathering identified the Functional Economic Area and housing market area as Greater Manchester and this is further recognised in the establishment of the GM Local Enterprise Partnership, GM Natural Capital Group, TfGM and GMCA covering the same area. Therefore, for the purposes of PfE</p>

		<p>we consider our formal Duty to Co-operate bodies in relation to these matters to be our neighbouring authorities plus the relevant national bodies. Therefore, CWaC is not considered to be a formal DtoCo body as it is not a neighbouring authority.</p> <p>NPPF does, however, allow for broader collaboration than on Duty to Co-operate strategic matters. It enables other parties to be brought in on matters of interest to them. As such, it was felt appropriate to include CWaC as a local authority who has raised concerns about the approach to minerals in the PfE Plan, particularly as this is a matter included in the SoCG with Cheshire East.</p> <p>The substantive concern from CWaC is that there is no specific date for undertaking a formal review of the GM Joint Minerals Local Plan. Without such a commitment, CWaC are concerned that the Plan may not be deliverable, particularly in the latter years as the nine districts will not have sufficient minerals reserves to meet the growth being proposed which could, in turn, have impacts for districts such as CWaC in terms of planning for minerals extraction. Consequently, CWaC are seeking further certainty around the commitment to review the GM Joint Minerals Local Plan and would like to see revisions to the districts' LDSs to identify a start date and timetable for the review.</p> <p>GMCA acknowledge the concerns raised by CWaC and are going to request that the PfE districts make a commitment to update the GM Joint Minerals Local Plan following the PfE Plan. This would be reflected in their Local Development Schemes.</p> <p>All parties agreed this was a way forward to meet these concerns.</p>
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		<p>CWaC have indicated they would be more comfortable with signing the SofCG if it can be shown that site allocations within the PfE take account of the presence of minerals (specifically aggregate sand and gravel).</p> <p>The PfE representatives explained that the notwithstanding CWaC's concerns in relation to its review, no policies within the adopted GM Joint Minerals Local Plan are to be superseded by the PfE Plan. Therefore, it is considered that this matter remains adequately addressed in the policy relating to "Prior Extraction of Mineral Resources" policy from the adopted GM Joint Minerals Local Plan. A copy is appended to this note, plus a link to the GM Joint Minerals Local Plan and GM Joint Waste Local Plan.</p> <p>Additionally, where relevant, the allocation topic papers produced as part of the evidence base for the PfE Plan provide further site specific details in relation to this matter</p> <p>Next Steps:</p> <ol style="list-style-type: none"> 1. PfE Districts will be asked to update their LDSs and include a commitment to start the review of the GM Joint Minerals Local Plan following the PfE Plan. 2. The Prior Extraction of Mineral Resources policy from the GM Joint Minerals Local Plan is to be provided to CWaC 3. CWaC to consider signing the Statement of Common Ground to reflect the collaboration with PfE districts relating to this matter. <p>It was acknowledged that notwithstanding the comments made in relation to Duty to Co-operate, the detail of CWaC's comments will be submitted to the Secretary of State for consideration through the EiP, alongside all other PfE representations.</p>
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21st January 2022	Rossendale BC	Email from MCC (DtoCo Lead) to Rossendale confirming the reference to the M66/A56 Steering Group Meetings has been added to the Log of Collaboration in the relevant sections and attaching a current version of the Log of Collaboration.
21st January 2022	Rossendale BC	Email from Rossendale BC with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
21st January 2022	Warrington	Email from Warrington with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below. Also requested a meeting to discuss Natural England's concerns regarding the in-combination effect on the Manchester Mosses SAC.
24th January 2022	St Helens	Email from MCC (PfE DtoCo Lead) to St Helens with the latest version of the SofCG which included the amended reference to the M6 Junction 23 Feasibility Study, as requested.
25th January 2022	Stockport	Email from GMCA to Stockport stating: "I am writing to you regarding the PfE Statement of Common Ground and a number of outstanding duty to co-operate matters. On 14th December 2021, we sent an email with the latest PfE Submission Statement of Common Ground and Stockport's Individual Log of Collaboration and Signing Sheet, seeking a signature to the relevant Statements identified by the end of December 2021. Stockport colleagues indicated that they would need time to review the document before responding and it was unlikely that they would be able to provide a signed document before January 2022. Stockport colleagues were asked if they could identify those matters which could be signed sooner rather than later

		<p>and those which may require more discussion, as this would assist the timely preparation of the PfE Submission documentation.</p> <p>We had a meeting on the 15th December 2021, requested by yourselves, and following this, we shared a note which we consider is an accurate record of the outstanding PfE duty to co-operate issues. We have not had any amendments suggested therefore the note will be added to our log of collaboration unaltered.</p> <p>At the meeting, it was acknowledged by Stockport that there was a need to set out what they considered the strategic cross boundary matters between Stockport and the PfE districts. Whilst acknowledging that the issues would be broadly similar to those identified in the PfE Statement of Common Ground, as part of your local plan preparation, you needed to identify what you considered to be the strategic cross boundary issues which relate to the PfE districts and Stockport. As such, Stockport committed to writing to the PfE districts to set these out. At this point, there has been no correspondence or meeting explaining or discussing what these might be with the GMCA on behalf of the 9 districts.</p> <p>At the meeting, the GMCA reminded Stockport that they are yet to respond to the formal request in the letter dated 19th April 2021 asking if they are able to accommodate any of the PfE's unmet need. A formal request was made to all neighbouring authorities including Stockport, all other neighbouring authorities have now responded.</p> <p>Also, discussed was the Schedule of evidence jointly prepared in support of the GMSF, which Stockport intends to use to support their Local</p>
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		<p>Plan preparation. It is intended to publish this list as part of the record of the discussion of the 15th December 2021.</p> <p>Stockport also said the SHLAA update was expected mid to late January 2022. Please can you confirm when your land supply will be available.</p> <p>A follow up email was sent 10th January 2022 requesting a signature to the PfE Submission Statement of Common Ground by 21st January 2022, to enable documents to be prepared for the PfE Submission in mid-February 2022. This is a further follow up email requesting a signature to the PfE Statement of Common Ground or a response to the outstanding matters which were discussed at the 15th December 2021 meeting.</p> <p>The PfE is expected to be submitted by 14th February 2022 and the PfE districts would like to have obtained Stockport's signature to some or all of the relevant Statements in the Statement of Common Ground and also to confirm the collaboration which has evidently taken place by this date.</p> <p>I have attached the Statement of Common Ground signing sheet for your authority's signature. If possible, please can signatures be returned toas soon as possible due to the deadline of PfE Submission fast approaching.</p>
27th January 2022	Cheshire West & Chester	Email from CWaC to the PfE districts confirming they are happy with the meeting note of 20th January 2022. They sought an update to the SofCG and or signing sheet to take account of the matters discussed.
28th January 2022	St Helens	Email from MCC (PfE DtoCO Lead) to St Helens following a telephone conversation, regarding collecting St Helens signature to

		<p>the PfE Statement of Common Ground. Attached to the email was the St Helens Individual Log of Collaboration with PfE districts and the Signing Sheet, a copy of the email from Wigan to St Helens providing more information on the matters raised in the 15th November 2021 meeting and a copy of the note of the 15th November 2021. It also referred to the further amends to the PfE Statement of Common Ground to better reflect a previous study into M6 J23. It sought a signature before Submission on 14th February 2022.</p>
7th February 2022	Stockport MBC	<p>Email from GMCA to Stockport stating:</p> <p>" We have been discussing Duty to Co-operate and Statement of Common Ground matters for some months since Stockport's withdrawal from the GMSF (the joint development plan document of the 10 GM authorities). It is clear that Stockport and the other 9 GM authorities have co-operated on strategic matters for many years, and this co-operation has continued since your decision to pursue your local plan at the end of 2020. Given this close working relationship over many years, we are confident that you agree that the 9 PfE authorities have discharged their Duty to Co-operate responsibilities with Stockport as far as possible given the early stage that the Stockport Local Plan has reached and the lack of information that you have been able to share to date.</p> <p>I know that you were meeting your Executive Member last Tuesday (1 February) to discuss the Statement of Common Ground. We are due to submit our plan on Monday 14 February so I would be grateful if you could let me know when we can expect a signature and the extent of 'common ground' that you</p>

		<p>are willing to sign up to, no later than Wednesday 9 February, as we are finalising our Submission documents.</p> <p>If you would like to meet to discuss please let me know as a matter of urgency and we will prioritise your request.</p>
8th February 2022	St Helens	Email from St Helens stating officers have shared the PfE Statement of Common Ground with the Director and it has been agreed to take it to a Portfolio Holder briefing session (17 Feb). Following this, the formal decision making process will be followed, and once completed, the Council will update the PfE districts.
8th February 2022	Stockport MBC	An email from GMCA to Stockport with some suggested changes to relevant sections in the PfE Statement of Common Ground relating to employment and housing. These changes outline that the PfE districts are still awaiting information from Stockport but are looking to agree a way forward which doesn't hold up the PfE and respects the stages that the Stockport Local Plan/PfE has reached.
10th February 2022	Stockport MBC	An email from Stockport responding to the email dated 8th February 2022. This made a further set of suggested amendments to the SofCG and the 15th December 2021 meeting note. These related to unmet need existing in Stockport and also being unable to meet any of PfE's unmet need.
10th February 2022	Stockport MBC	Response to email dates 10th February 2022 above setting out which amendments to the SofCG can be accepted, which can't be accepted and also suggesting alternative amendments. It also proposed that rather than amending the note, there is an 'update' section which sets out Stockport's position re meeting PfE unmet need/latest land supply position as confirmed on 10th February 2022.

10th February 2022	Stockport MBC	Email from Stockport stating "I'm a little concerned that this reads as though Stockport have only just confirmed this position, when we have consistently been advising that despite the work we were carrying out that we did not anticipate that this would significant reduce the gap between supply and need."
10th February 2022	Stockport	<p>Email from the GMCA to Stockport stating "Thanks for looking at this urgently. I am a little bit surprised by your email because this is the point that we have been discussing all along. In particular, I can't find the evidence to support your position that you have consistently advised that there is 'likely' to be a significant land supply gap. However even if that is the case, as set out in the Mayor/City Mayor's response to Cllr Wilson, it is not sufficient to provide anecdotal evidence that there will be a gap.</p> <p>From our Duty to Co-operate Log of Collaboration we have recorded:</p> <ul style="list-style-type: none"> • A letter from you in March 2021 asking if the PfE districts were willing to accept the same number of homes as had been the case with GMSF. This was not expressed as a request to meet your unmet need, and our response and the subsequent Duty to Co-operate statement explained this. In any event, the basis on which Stockport's 4,900 homes had been absorbed by other districts in GMSF was not on the basis of unmet need in Stockport but to deliver the agreed spatial strategy. This was also the case for other districts in GM who were not meeting their own LHN through GMSF This was also explained in our response and the Duty to Co-operate statement. • A letter from Cllr Wilson in October 2021 outlining that whilst the review of the Strategic Housing Land Availability

		<p>Assessment work was not yet complete “a gap” had been identified. Cllr Wilson did however advise the Mayor and City Mayor Paul Dennett that this number had been shared on a strictly confidential basis. Respecting the request for confidentiality the Mayor and City Mayor did not share this with other Leaders but they responded to Cllr Wilson’s letter on the basis that Duty to Co-operate cannot be discharged confidentially, it needs to be a transparent process. Their response also outlined the information that was required by NPPF to allow the PfE districts to consider properly a request to meet any unmet needs in Stockport, namely a detailed assessment of capacity, including the proposed plan period, local housing need figure, the updated land supply evidence and a detailed justification with particular reference to the criteria in NPPF paragraph 11(b). This is particularly relevant because the figure quoted by Cllr Wilson did not correspond with the land supply evidence base which underpinned GMSF, making it clear that further work has been undertaken by Stockport which we are, as yet, unaware of. To date none of this information has been shared with us and I am unaware that your SHLAA has been published yet. Whilst the letter from Cllr Wilson will not be included on the Log, the response from the Mayor and City Mayor will be.</p> <ul style="list-style-type: none"> • Note of a meeting in December was sent to you for amendment/agreement on 17 December, in which it was recorded that we were awaiting confirmation of Stockport’s land supply position. This note accurately reflects our recollection of the meeting. We followed this up in January and asked if you could agree that this was a correct record. You responded along the lines that you could
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		<p>not meet our deadline for responding (21 January) but you reserved the right to comment. Comments were received on 10 February from Stockport confirming that 'ongoing work was not anticipated to result in a significant change to their housing or employment land supply positions'. This was not stated at the meeting which is why we suggest it is incorporated as an update to the meeting note.</p> <p>We are however essentially still in the same position as March 2021 as you are open about the fact that the work you need to do to come to an evidenced position where you can ask neighbouring authorities (not just the PfE districts) whether they are able to accommodate any of your unmet needs, is not yet completed. In the light of this it is considered that the Statement of Common Ground as forwarded yesterday is an accurate reflection of the current position. If you feel that any of the above is not correct, or that there is additional correspondence that I have missed, please let me know."</p>
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Table 18.3 Collaborative Activity with Neighbouring Authorities

18.4 Public Bodies

Date	Body	Actions
18th August 2021	Highways England	<p>Presentation to Highways England from TfGM covering :</p> <ol style="list-style-type: none"> 1. HE/WSP general feedback on work in progress reports / tools relating to the PfE SRN Workstream issued by SYSTRA on 27 July 2021 2. Overview of Comparison between Base Year Observed and Modelled Flows 3. Preliminary Findings for SRN Links – GIS maps 4. Work in Progress relating to SRN junctions - GIS maps

		5. Other proposed analysis eg. merge / diverge analysis
25th - 31st August 2021	Email from GMCA to- <ul style="list-style-type: none"> • Environment Agency • Historic England • Local Nature Partnership • Local Enterprise Partnership • Historic England • Homes England • Natural England • Network Rail • Salford Clinical Commissioning Group • National Highways 	Email sent to Public Bodies attaching an Individual Log of Collaboration summarising all Duty to Cooperate activity to date and requesting a signature for the Statement of Common Ground.
3rd September 2021	Highways England (National Highways)	SYSTRA/ TfGM emailed a Table of SRN junctions with junction capacity assessment results (work in progress).
6th September 2021	Highways England (National Highways)	Meeting between TfGM/SYSTRA and National Highways to explain the Table of SRN junctions with junction capacity assessment results and the proposed approach for the merge / diverge assessments. There was also some group discussion of how the results might be interpreted in terms of mitigation requirements.
9th September 2021	Natural England	A meeting with Natural England to discuss the Habitat Regulation Assessment for the PfE, including: Air Quality Assessment:

		<ul style="list-style-type: none"> Natural England considered the Air Quality Screening Assessment to be thorough and heading in the right direction. An updated Air Quality Assessment to be circulate to Natural England for comment. <p>Functionally linked habitats:</p> <ul style="list-style-type: none"> Natural England had no outstanding concerns regarding functionally linked habitats, nevertheless, the evidence to support the conclusion on this section of the HRA could be presented and made clearer. <p>Impact on the Mersey Estuary SPA:</p> <ul style="list-style-type: none"> Natural England require further information and confidence that the growth anticipated in the PfE will not detrimentally impact on this SPA. <p>Recreation impact on the South Pennine Moors SAC/SPA:</p> <ul style="list-style-type: none"> Natural England advised that further work is required to assess the recreation impacts on the PfE on protected habitats at the South Pennine Moors.
15th September 2021	Highways England (National Highways)	Greater Manchester Highways Strategy Board met to discuss transport matters including that supporting PfE. Attendees were: TFGM, GMCA, Highways England (National Highways).
16th September 2021	NHS Salford CCG	Email from Salford CCG requesting a copy of the Statement of Common Ground in Word format to enable an electronic signature to be added.
20th September 2021	Natural England	Email from Ricardo/GMCA to Natural England, summarising progress on Air Quality Assessment for the Habitat Regulation Assessment of the PfE.
21st September 2021	NHS Salford CCG	Email from Salford CCG with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
22nd September 2021	Historic England	Email from GMCA to Historic England with a summary response to the table of comments submitted in July 2021. See Section 18.7 below.
31st August to 23rd November 2021	Environment Agency	Exchange of emails between Environment Agency and GMCA regarding references in the Log of Collaboration to a presentation given by an Environment Agency

		<p>employee who at the time was a GMCA Project Manager, they sought removal of reference to Environment Agency giving the presentation. This was removed.</p> <p>The SofCG was also amended to more accurately reflect the Environment Agency's technical work on the SFRA.</p>
1st October 2021	Natural Capital Group	<p>Natural Capital Group Action Plan meeting held on 1st October 2021 considered PfE Statement of Common Ground. It agreed in principle to Statement of Common Ground/Duty to Cooperate statement and Log of Collaboration to be an accurate representation of activity between NCG and PfE Plan. NCG raised the need for continued collaborative working on issues such as Peat and Carbon neutrality.</p>
5th October 2021	Highways England (National Highways)	<p>An email to National Highways and their consultants WSP attaching a comprehensive set of files comprising the SRN junction capacity analysis undertaken by SYSTRA under PfE SRN Workstream.</p> <p>This is provided as part of the agreed technical data sharing and should also address many of the related comments set out in the report entitled "Places for Everyone Regulation 19 Consultation – Documentation Review" by WSP dated October 2021.</p> <p>The files provide the following:</p> <ol style="list-style-type: none"> 1 SRN Junctions Full Analysis [attached] 2. SRN Junction Flows [to be sent via download link] 3. Local Junction Model Files – [to be sent via download link] The actual assessment files categorized into folders based on the particular SRN corridor being assessed
2nd November 2021	Historic England	<p>Historic England met with GMCA to discuss comments made to PfE publication. Discussion comprised:</p> <ul style="list-style-type: none"> • Comments made to the PfE Publication by Historic England. • Discussion followed a Table of amends suggested by Historic England, as part of their comments. • GMCA set out the position around making modifications to a Joint DPD of the 9 districts.

		<p>Approval already gained for submission therefore unless any significant new “showstopper” issues are raised the Plan will be Submitted in January 2022.</p> <ul style="list-style-type: none"> • GMCA will start discussions with districts around the suggested modifications made by Historic England. • Any proposed Modifications as a result of Historic England’s comments will need to be considered through the Examination, either as part of ongoing DtC discussions or through a wider Modifications process .
10th November 2021	GM Local Enterprise Partnership	<p>Following the meeting of the LEP on 21st September and the Board agreed to sign the Statement of Common Ground, an email was sent from Head of Planning Strategy at the GMCA attaching the Individual Log of Collaboration and Signing Sheet.</p>
10th November 2021	Highways England (National Highways)	<p>Systra shared via email the merge and diverge assessments for the whole network with National Highways and their consultants WSP, this included a spreadsheet covering merge and diverge for the whole network, draft Merge-Diverge Assessment Summary Sheet and Maps for merges and diverges on sections of the M60 and M61.</p> <p>The information was provided in advance of the meeting to discuss the evidence base and next steps.</p>
11 November 2021	Natural England	<p>A meeting took place with Natural England to discuss the Habitat Regulation Assessment for the PfE, including:</p> <p>Air Quality Assessment:</p> <ul style="list-style-type: none"> • Consideration of the ‘in-combination effect’ • Progress on air quality modelling at Manchester Mosses SAC including a discussion on potential mitigation options. • Progress on the air quality modelling for the Rochdale Canal SAC and the South Pennine Moors SACs/SPA. <p>Recreation impact:</p> <ul style="list-style-type: none"> • Consideration of how other local authorities have assessed impact on the South Pennine Moors. <p>Water Quality:</p>

		<ul style="list-style-type: none"> GMCA to obtain a statement from United Utilities about managing the wastewater in GM over the PfE plan period.
11th November 2021	Natural Capital Group	Email from Head of Planning Strategy GMCA stating that following the NCG's discussion and comments, the PfE Statement of Common Ground has been amended and is attached for the Chair to sign.
12th November 2021	Natural Capital Group	Email from NCG with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
17th November 2021	Highways England (National Highways)	A meeting was held between SYSTRA, TfGM, National Highways and WSP. A discussion was held on the progress of the SRN Study and specifically on the ongoing merge/diverge analysis. Data outputs in the form of excel spreadsheets regarding merge-diverge assessments was shared 2 weeks prior to the meeting and were explained at length during the meeting. The group agreed that there remained a need to prepare a Statement of Common Ground irrespective of whether further work was still pending. Both NH and TfGM agreed to consider what they wanted to see in the SOCG prior to the next meeting. NH stated that they would be giving feedback on the SRN Junction Analysis data outputs in 2 weeks time, and that this would point to further work that may subsequently be required.
19th November 2021	GM Local Enterprise Partnership	Email from GM Local Enterprise Partnership with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
1st December 2021	Highways England (National Highways)	Greater Manchester Highways Strategy Board met to discuss transport matters including that supporting PfE. Attendees were: TFGM, GMCA, National Highways.
3rd December 2021	Highways England (National Highways)	<p>Email from National Highways to TfGM stating they have completed the PfE Junction model review. Attached was a document summarising the overarching findings and a spreadsheet summarising the junction by junction review comments. In summary they state,</p> <p>WSP have raised some concerns regarding the coding of the junction models, some of which may impact on the conclusions made from the modelling. Areas they have</p>

		<p>highlighted in the review fall into the following themes (albeit all the comments do not exclusively fall within these):</p> <ul style="list-style-type: none"> • No base calibration has been provided for any of the junction models. • Coding concerns have been highlighted within the provided junction models, some of which may impact upon the outturn conclusions from the models. • Comparisons between the 2040 model forecast and Webtris data (2018/2019 and 2021) have shown certain locations to have a lower demand in the model forecast than in Webtris, raising concerns over the forecast demands. • Instances where the scheme description/drawing does not match what has been modelled, and therefore clarification is sought. The drawings were provided in an Excel spreadsheet, and for a more thorough review the drawing files would be required.
6th December 2021	Natural England	Email from Ricardo/GMCA to Natural England seeking advice on habitat types at Holcroft Moss SAC for the Habitat Regulation Assessment of the PfE.
7th December 2021	Highways England (National Highways)	A meeting was held between SYSTRA, TfGM, National Highways and WSP. A discussion was held on the progress of the SRN Study and specifically: the policy context of the work, feedback on SRN junctions, update on mainline merge/diverge analysis, and statement of common ground. It was agreed that neither TfGM nor NH were likely to be able to draw up a statement of common ground/position statement in time for submission without additional support. As such, SYSTRA will be tasked with drawing up a high level document that sets out the latest position and broad areas of agreement with NH to sign SOCG prior to submission to EIP in Jan/early Feb. It was also agreed that NH will share a map of SRN smart/controlled motorway status and technical discussion between junction modellers to be arranged.
13th December 2021	Environment Agency	Email to the Environment Agency attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE

		Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements. It sought signatures by the end of December 2021.
13th December 2021	Natural England	<p>A meeting with Natural England to discuss the Habitat Regulation Assessment for the PfE, including:</p> <p>Air Quality Assessment:</p> <ul style="list-style-type: none"> • GMCA to assess the 'in-combination' air quality on Holcroft Moss with Warrington's Local Plan. • Ricardo to consider additional reports for the impact on the Rochdale Canal <p>Recreation impact assessment:</p> <ul style="list-style-type: none"> • GMCA/Ricardo to continue working on the assessment on the South Pennine Moors. <p>Duty to Cooperate:</p> <ul style="list-style-type: none"> • GMCA to circulate SofCG to Natural England for comment and agreement.
14th December 2021	Historic England	Email to Historic England attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements. It sought signatures by the end of December 2021.
14th December 2021	The Mayor of Greater Manchester	Email from the Mayor of Greater Manchester with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
16th December 2021	Natural England	Email from Ricardo/GMCA to Natural England summarising the detailed air quality modelling at Holcroft Moss SAC for the Habitat Regulation Assessment of the PfE.
17th December 2021	Environment Agency	Email from Environment Agency with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.

17th December 2021	Historic England	Email from Historic England stating they were unable to sign the Statement of Common Ground. They explained "At the moment we are concerned that the SoCG does not set out in detail our position on the outstanding matters as per our comments through the Reg. 19 consultation. We intend to come back to you by 14th January. In addition, are you able to inform me whether going into Examination in Public there will be a more detailed statement which goes through each of the comments submitted by Historic England as part of the Regulation 19 consultation and whether it is agreed or there is disagreement that these should be resolved through main modifications to the Local Plan."
23rd December 2021	Natural England	Email from Ricardo/GMCA to Natural England summarising the air quality modelling at the South Pennine Moors for the Habitat Regulation Assessment of the PfE.
December 2021 – January 2022	Natural England	Emails between the GMCA and Natural England to agree the text in the Statement of Common Ground on the Green Places Chapter of the PfE, including the Habitat Regulation Assessment and green infrastructure.
5th January 2022	Historic England	<p>Email to Historic England from GMCA responding to their email dated 17th December 2021: "Thank you for your email. I am not surprised by your response to our email but I do want to reassure you that we are working through your comments and are in the process of updating the table we talked through with you at our meeting on 2 November, in the light of yours and other comments we have received in relation to the approach to the historic environment in the plan. We will hopefully be in a position to send this to you in the next couple of weeks.</p> <p>The Statement of Common Ground is about where we have got to i.e. resolution or continuing ongoing work on both this plan and commitment for other statutory documents, i.e. district local plans, to deal with issues. Details of your comments will of course be provided in the Consultation Statement and a summary will be provided in the Duty to Co-operate Log of Collaboration. "</p>
6th January 2022	Natural England	A meeting with Natural England to discuss the Habitat Regulation Assessment for the PfE. The purpose of the meeting was to seek guidance from Natural England on the habitat types and conditions in which they are in at the

		South Pennine Moors SAC/SPA, that might be adversely affected by air pollution. Discussion followed on with potential mitigation routes.
11th January 2022	Natural England	Email to Natural England attaching the updated PfE Submission Statement of Common Ground and Individual Log of Collaboration and Signing Sheet. It stated updates to the document have been made to bring it in line with the current stage (Submission), add relevant comments made by Duty to Co-operate Bodies to the PfE Publication, reflect Duty to Co-operate meetings and outcomes between Publication and now, and include any subsequent amends to the Statements. It sought a signature by the mid January 2022.
12th January 2022	National Highways	Meeting between TfGM/Systra and National Highways/WSP to discuss PfE SRN Worksteam - Junction Modelling Discussion.
26th January 2022	Historic England	<p>Email from GMCA to Historic England reminding Historic England that their 17th December email referred to them getting back to us by 14th January 2022 but no further information had been received. It stated:</p> <p>"By way of an update, we are still on track for submitting the PfE Plan to the Secretary of State in a couple of weeks and would therefore very much appreciate it if we could reach a resolution on the Duty to Co-operate matters and secure a signature to the Statement of Common Ground, to that effect.</p> <p>Since my email of the 5th January, we have continued to work through all the comments submitted to the Regulation 19 PfE Plan, including those made by Historic England and in line with Regulation 22 we are producing a statement which will include a summary of the main issues raised in those representations together with summary responses to those main issues. We will share this with you as soon as possible, but we consider that Historic England should be in a position to sign the SoCG in advance of it being shared. The Statement of Common Ground summarises where we have got to i.e. resolution or continuing ongoing work on both this plan and commitment for other statutory documents, i.e. district local plans, to deal with issues.</p>

		<p>In relation to how your detailed representations will be dealt with going forward through the Examination, it would be our intention to provide more detailed statement(s) which would set out where there is agreement and/or disagreement and how these matters could be resolved. However, as you will be aware, the precise process in relation to such matters will be determined by the Inspectors once the Plan has been Submitted.</p> <p>In order to reflect the above and your email of the 17th December, we have proposed some slight amendments to both the SoCG Statement 10 and the bespoke Historic England signing sheet. These are attached both as a clean version and a tracked changes version, for ease of comparison. The latest draft SoCG incorporating these changes is also attached for reference.</p> <p>We hope that these amendments will enable Historic England to be able to sign the SoCG, confirming that it is an accurate reflection of the effective co-operation that has taken place to date, whilst signalling that further discussions will take place in relation to matters of detailed wording as the Plan progresses.</p> <p>If you would like to have a further meeting to discuss these matters, I would be grateful if you could let me know as soon as possible. Alternatively, I would be grateful if you could advise whether and when you would be in a position to the sign the statement."</p>
26th January 2022	NHS Property Services	Email from GMCA to NHS Property Services seeking agreement to continued collaboration with PfE districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) on the delivery and implementation of the PfE. A signatures or a response was sought by provided by the end of the week to allow documentation to be prepared for Submission 14th February 2022.
26th January 2022	Highways England (National Highways)	Email from National Highways to TfGM seeking clarity on the Statement of Common Ground.

26th January 2022	Highways England (National Highways)	Email from TfGM attaching the draft Statement of Common Ground with National Highways, plus RIS3 evidence reports.
27th January 2022	Highways England (National Highways)	Highways Strategy Board Working Group meeting.
27th January	Historic England	<p>Letter from Historic England to GMCA stating that the GMCA has carried out its legal obligations under S33A of the Planning & Compulsory Purchase Act 2004 as amended in respect of the Duty to Cooperate. They also state "Unfortunately, we remain in a position where we are unable to sign the signature sheet."</p> <p>They hope in due course to be in a position to enter into a Statement of Common Ground once the GMCA sets out in detail how it proposes to put suggested modifications forward to any appointed planning inspector in relation to their representations made on the Regulation 19 version of the Places for Everyone Plan.</p> <p>Extracts from the letter dated 27th January 2022, shown in Section 18.7</p> <p>"GMCA has fulfilled its legal obligations under the Duty to Cooperate and we are not objecting on this point. ".....</p> <p>"Our suggested way forward</p> <p>We support the principle of signing a Statement of Common Ground with the GMCA that sets out in detail matters of agreement/ disagreement. Should the document be amended to set out the outstanding issues on the Plan and the GMCA's response to these then we would be able to sign up to the document.</p> <p>Alternatively, and our preferred way forward, a separate Statement of Common Ground could be drafted, either by the GMCA or Historic England. Best practice is to include a table providing a response to the representations made through the consultation of the Plan in October 2021. We enclose the tables prepared for information.</p>

		It would be helpful if you were able to confirm at the earliest opportunity your position on this, so that we are able to provide some clarity and certainty on any outstanding matters for the Inspector as the Plan progresses to EIP."
28th January 2022	Highways England (National Highways)	<p>Email from SYSTRA to National Highways referring to the email from National Highways on 3rd December 2021 and the Workshop with WSP on 12th January 2022, attaching a response comprising a short Technical Note and an annotated spreadsheet.</p> <p>The Technical Note entitled "SRN Workstream – Response to National Highways Comments on PfE Junction Modelling" provides a point-by-point response to the WSP Note in pdf format entitled "Places for Everyone- Junction Model Review".</p> <p>The annotated spreadsheet entitled "Junction Model Review Log_V4" provides SYSTRA's response to the detailed comments on each of the provided junction models.</p> <p>It is worth reiterating the point that approximately one-third of the junction models were created by third party consultants (the spreadsheet flags when this is the case). Updating these is likely to be a more time-consuming and involved task. The specific approach for tackling this task also requires discussion.</p> <p>Systara suggest a follow-up workshop with WSP to talk through our response.</p>
2nd February 2022	Highways England (National Highways)	<p>Statement of Common Ground Workshop with National Highways, TfGM, GMCA, WSP, SYSTRA.</p> <p>Workshop was planned for 3 hours to go through the separate Statement of Common Ground with National Highways, setting out the ongoing work. At this point, National Highways and WSP were unwilling to go through the document. They promised to give a track changed version setting out their comments by Friday 4th February 2022 with a follow up Workshop planned for 7th February 2022. This was subsequently rearranged to a tracked change version by Monday 7th February and a Workshop 9th February.</p>

3rd February 2022	NHS Property Services	Email from NHS Property Services with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
4th February 2022	Highways England (National Highways)	<p>Email from SYSTRA on behalf of TfGM to National Highways and their consultants WSP, stating,</p> <p>SYSTRA have been liaising with the third party consultant responsible for the JPA6 West of Wingates allocation. This consultant is responsible for the TRANSYT modelling at M61 J6 and the adjacent A6 / De Havilland Way junction.</p> <p>The third party consultant has made some changes to the TRANSYT model at our request and have provided updated TRANSYT model files (see attached). They have also provided an updated scheme drawing (also attached).</p>
8th February 2022	Manchester University Hospital NHS Foundation Trust	Email sent by MCC (as PfE Duty to Co-operate Lead) to Manchester University Hospital NHS Foundation Trust summarising all Duty to Cooperate activity to date and requesting a signature for the Statement of Common Ground
8th February 2022	Bury Clinical Commissioning Group	Email sent by MCC (as PfE Duty to Co-operate Lead) to Bury Clinical Commissioning Group summarising all Duty to Cooperate activity to date and requesting a signature for the Statement of Common Ground
8th February 2022	National Highways	Meeting between TfGM/Systra and National Highways/WSP to discuss SRN Junction Model Review Workshop
9th February 2022	National Highways	Reconvened Workshop attended by National Highways and their consultants WSP, MCC (as PfE Duty to Co-operate Lead), TfGM and their consultants Systra. Discussed the approach to the Statement of Common Ground. Agreed to wording which could replace the current Statement 11 Connected Places.
10th February 2022	Bury Clinical Commissioning Group	Email from Bury Clinical Commissioning Group with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
10th February 2022	Natural England	Email from Natural England with signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.

11th February 2022	National Highways	Email from National Highways signed PfE Statement of Common Ground Signing Sheet attached, see Section 18.8 below.
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Table 18.4 Collaborative Activity with Duty to Co-operate Bodies

18.5 Stockport Council

ANDY BURNHAM
**MAYOR OF
GREATER
MANCHESTER**

Councillor Elise Wilson
Leader of Stockport Council
cllr.elise.wilson@stockport.gov.uk

Via email

3rd December, 2021

Our ref: AB/PD/AM

Dear Elise,

Thank you for your letter dated 21 October 2021 in response to our letter of 26 July 2021.

You have requested that consideration be given to Stockport's unmet need being accommodated in Places for Everyone. At the outset, we must clarify that we are unable to engage in discussions with you on this matter on a confidential basis. As you will be aware, NPPF paragraph 11(b) sets out the circumstances in which strategic policies should provide for any needs that cannot be met within neighbouring areas, as established through statements of common ground, which are public documents. As such, whilst we intend to respect your request for confidentiality in connection with the details contained within your letter of 21 October, it is our intention for our response as set out in this letter to form part of the suite of documents to be submitted to the Secretary of State with the Places for Everyone publication plan.

Turning to the substance of your request, NPPF paragraph 11(b) establishes that a local authority should prepare strategic policies which provides for its own objectively assessed needs in full, unless:

- The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the borough; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

Furthermore, NPPF paragraph 35(a) requires plans to be "positively prepared", which involves providing a strategy which as a minimum seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities to accommodate unmet need from neighbouring areas where practical and sustainable. NPPF paragraph 61 also acknowledges that any housing needs that cannot be met within neighbouring areas should be taken into account.

We are unable to consider your request to meet Stockport's unmet need in Places for Everyone in the absence of an explanation from you as to why Stockport cannot meet its own objectively assessed need in full. In order for us to consider further, we require you to provide a detailed assessment of capacity, including the proposed plan period, local housing need figure, the updated land supply evidence and a detailed justification with particular reference to the criteria in NPPF paragraph 11(b). Please also confirm the current timeframe for commencing Regulation 18 consultation in respect of Stockport's local plan.

The Mayor's Office, Broadhurst House, 56 Oxford Street, Manchester, M1 6EU

Picture 18.1 Joint Letter to Councillor Elise Wilson from Mayor of GM and City Mayor of Salford

As explained above, this information must be shared with us on an open and transparent basis as it will form part of the evidence base of our respective local plans.

Your letter also raises matters which are not directly related to the plan-making process and we will respond to you on these points separately.

Yours sincerely



Andy Burnham
Mayor of Greater Manchester
Chair of the GMCA



Paul Dennett
City Mayor of Salford
GMCA Portfolio Leader for Housing,
Homelessness and Infrastructure

Picture 18.2

Name of Organisation	Stockport Metropolitan Borough Council
Type of collaboration - meeting, email, presentation, on-going working group, established Board in GMCA Governance Structure, any other	Meeting
When? (date)	15 th December 2021
Who attended?	Stockport Tameside GMCA TfGM MCC (PfE DtoCo Lead)
What was discussed?	1 Cross boundary issues – Tameside/Stockport/Bredbury 2. Stockport Local Plan 3. SofCG

Issue	Comments
Bredbury Appeal	Bredbury Appeal hearings commencing early February 2022. Discussed whether there were any PfE issues being raised at Appeal. These mainly relate to the planning history/ context of the site and that objections were made to the site when it was in the GMSF. Stockport are seeking to agree Employment Land Position within the appeal SoCG, this was not one of the reasons for refusal. They are also seeking to agree through the appeal SofCG general issues; transport; biodiversity; landscape. Stockport and Tameside discussed a number of aspects of the Appeal relating to highways, height limits re bridge, cycle and walking routes into Tameside. Stockport's Statement of Case will be ready by 4 th January 2022. They also discussed continued joint working on bids for cross boundary transport schemes.
Godley Green	Discussed the planning application relating to Godley Green. It was acknowledged that the transport modelling to support a strategic development plan, such as the PfE, was different to that needed for a planning application. This is recognised in the PfE in JP-C7 Transport Requirements of New Development to be accompanied by a TA/ TS and Travel Plan at planning application stage. Both sides agreed that the scope of the PfE locality assessments is clearly set out and reflected in the PfE Plan. As such it was agreed to have further discussion(s), separate to those in relation to the production of the PfE or the Stockport Local Plan, to discuss issues arising out of the current planning application at Godley Green. These discussions would need to involve relevant officers from Stockport, Tameside, TfGM and the GMCA and would need to take place within a timescale to reflect the determination of the planning application.

Issue	Comments
Stockport Local Plan	<p>Update on the Stockport Local Plan Timetable and reissued Local Development Scheme – Preferred Options Summer/Autumn 2022; Publication Summer/Autumn 2023; Winter 2023/2024; and Adoption Autumn 2024.</p> <p>It was described as a “hybrid Local Plan” with options, where required.</p> <p>Stockport acknowledged that although the issues would be broadly similar to those identified in the PfE Statement of Common Ground, as part of their local plan preparation, they needed to identify what they considered to be the strategic cross boundary issues which relate to the PfE districts and Stockport. As such, Stockport committed to writing to the PfE districts to set these out.</p> <p>SHLAA update expected mid to late January 2022</p>
PfE Statement of Common Ground	<p>Update provided on the PfE Statement of Common Ground.</p> <p>Stockport received a draft of the PfE SofCG during the PfE Reg 19 consultation. As with other neighbouring authorities Stockport have received an updated version of the document since the consultation closed and have been asked to provide a signed copy of the SoCG by the end of December 2021. It was explained that the revised SoCG was broadly the same as the one circulated in August.</p> <p>The GMCA explained the approach to collaboration had been through the Governance structure of the Joint GMCA/AGMA and subsequent Joint Committee. Despite Stockport no longer being part of the PfE, the PfE districts and Stockport were collaborating through a variety of means including all being members of the GMCA, GM LEP, GM Natural Capital Group & TfGM. Also, most of the evidence base was developed through collaborative involvement with Stockport when they were part of the GMSF. Plus, there was significant duty to co-operate activity since December 2020 which is set out in the SofCG and Duty to Co-operate Statement and Log of Collaboration. The SofCG has a Signing Sheet which identifies the “Statements” relevant to Stockport. Stockport colleagues indicated that they would need time to review the document before responding and it was unlikely that they would be able to provide a signed document before January 2022. Given this likely delay in signing the document, Stockport colleagues were asked if they could identify those matters which could be signed sooner than later and those which may require more discussion, as this would assist the timely preparation of the PfE Submission documentation.</p> <p>The GMCA reminded Stockport that they are yet to respond to the formal request asking if they are able to accommodate any of the PfE’s unmet need. A previous formal request was made to all neighbouring authorities including Stockport</p> <p>Also, discussed was the Schedule of evidence jointly prepared in support of the GMSF (as attached to this note), which Stockport intends to use to support their Local Plan preparation.</p>

Issue	Comments
Next Steps	<ul style="list-style-type: none"> • Stockport invited Tameside to work jointly with them on any cross boundary future transport funding schemes. • Stockport and Tameside agreed to meet to discuss issues arising out of the current planning application at Godley Green. This would involve officers from Stockport, Tameside, TfGM and the GMCA. • Stockport to consider the PfE Submission SofCG and the Statements identified as requiring a signature from Stockport. • Stockport to write to the PfE districts to update them in relation to their current local plan timetable and to set out strategic cross boundary issues relating to their local plan.
Update 10/2/22	<ul style="list-style-type: none"> • Stockport confirmed that they are unable to accommodate any of the PfE's unmet development needs. • Stockport confirmed that ongoing work was not anticipated to result in a significant change to their housing or employment land supply positions.
Outcome on PfE (Plan of 9), if any	
Provide evidence of collaboration	Continuing collaboration between PfE districts and Stockport to ensure both parties understand timings and implications for their plan processes.

Evidence Stockport Intends to use to Support the Stockport Local Plan Preparation

Schedule: evidence jointly prepared in support of GMSF

This schedule provides a list of evidence documents previously prepared in support of the Greater Manchester Spatial Framework. Some of these documents will provide direct evidence which it is intended to use in the preparation of the Stockport Local Plan. Those documents highlighted in italics may be of less direct use but, as a minimum, are considered to be useful in guiding the level of assessment or information that will need to be set out separately on a Stockport-specific basis.

- *GMSF Integrated Appraisal Report and associated documents*
- *Habitats Regulations Assessment of the GMSF*
- Land Supply Data (Housing)
- Land Supply Data (Industry & Warehousing)
- Land Supply Data (Offices)
- *GMSF 2020 Growth and Spatial Options Papers*
- *GMSF Strategic Viability Assessment Stage 1*
- Greater Manchester Carbon and Energy Implementation strategy

- Greater Manchester Strategic Flood Risk Assessment (SFRA) Level 1 Report and associated district level information
- *Greater Manchester Strategic Flood Risk Assessment Level 2*
- Greater Manchester Flood Risk Management Framework
- *Flood Risk Sequential Test and Exception Test Evidence Paper*
- Paper on Carbon and Fracking
- Economic Forecasts for Greater Manchester
- Employment Land Needs in Greater Manchester
- *Covid-19 and the GMSF Growth Options*
- Greater Manchester Strategic Housing Market Assessment
- Greater Manchester Gypsies, Travellers and Travelling Showpeople Accommodation Assessment Update 2018
- Green Infrastructure Policy Context
- Guidance for Greater Manchester on Embedding Green Infrastructure
- Biodiversity Net Gain Proposed Guidance for Greater Manchester
- Greater Manchester Biodiversity Net Gain Summary Report
- Stage 1 Greater Manchester Green Belt Assessment (2016)
- *Greater Manchester Case for Exceptional Circumstance to justify changes to the boundaries of the Green Belt*
- GMSF Historic Environment Assessment Summary Report June 2019
- Our 5-Year Transport Delivery Plan 2020-2025
- Greater Manchester Transport Strategy to 2040
- Greater Manchester Transport Strategy 2040 Refresh
- *Site specific transport Locality Assessments*
- Transport Strategic Modelling Technical Note
- Existing Land Supply and Transport Technical Note
- Greater Manchester Outline Business Case to tackle Nitrogen Dioxide Exceedance

Picture 18.3 Proforma of Meeting with Stockport MBC, Tameside, GMCA, TfGM, MCC 15 December 2021

18.6 Historic England

Greater Manchester Spatial Framework – Response to Historic England's comments					July 2021
Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
Evidence base	Lack of Historic Environment Topic Paper & HIA (or Historic Environment Assessments (HIA) to support site allocations. GMSF does not set out a positive strategy for the conservation and enjoyment of the historic environment.	Production of a Historic Environment Topic Paper & HIA (or Historic Environment Assessment as referred to in the evidence base) on relevant sites. Positive that these documents have been produced, but the findings need to be strongly interwoven throughout whole of GMSF. Work early 2021 has resulted in agreement that there will be a stronger link between HIA's and the allocated sites. Support these changes.	Not tying the evidence base to the plan risks the historic environment being seen as an after-thought and constraint rather than being embedded within the plan to drive its strategy. These should be equal as they are in the NPPF. The Plan should be as much place led as it is housing and economy but this doesn't come through the plan. The plan therefore fails to align with paragraph 185 of the NPPF, that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Risk Category – High	The topic paper provides strong evidence to be incorporated within the plan. Outcomes from the topic paper can be inserted into different parts of the plan. This has been done in parts (some of the heritage policy) but doesn't run through the plan.	GMCA welcomes the recognition that references to the historic environment evidence are included in the Plan, including to the topic paper. However, it is not considered that it is neither necessary nor appropriate to include such references throughout the Plan. Such an approach would be inconsistent with other policy areas in the Plan. It is important to remember that the Plan should be read as a whole. It is unclear how not including references to the heritage evidence base in multiple policies, makes the plan unsound
Chapter 1: Introduction	No mention of Historic Environment	Production of a Historic Environment Topic Paper	Introduction is important to describe what the plan is about. The introduction provides very little context on the identity of GM as a place. There is a need for the Plan to appropriately respond to this opportunity to secure a consistent level of protection and enhancement for the historic environment alongside other subject areas, in a positive and constructive manner. Risk Category – Low	Incorporate brief findings of topic paper into this section. The section needs to describe some of the overarching themes that provide a sense of place across GM.	Chapter one is not meant to provide a summary of all the policies in the PfE Plan, instead it provides a summary of the background underpinning the Plan. It doesn't include policies and therefore will have little, if any direct impact on decision making. Policy JP-P2 makes specific reference to the role of heritage in place making. Whilst specific reference to the historic environment could potentially be made in the "Place" section of chapter 1, it is not considered that this is necessary to make the Plan sound. Such changes could potentially be made through the modification process, should the panel of inspectors consider they are appropriate.
Chapter 2: Context	There is no mention of historic environment within this section.	Production of a Historic Environment Topic Paper	The document is top heavy on major economic growth, transport, cutting carbon and housing delivery but fails to take a holistic spatial approach to GM. Risk Category – Low	A spatial portrait of the geography of GM and its development would help people understand what is special about the place.	Chapter 2 provides high level context for the PfE Plan, such as the overall population and how the city region will play a role in key initiatives such as the northern powerhouse. It is not provided as the evidence base for the Vision, Strategic Objectives and Spatial Strategy, which follow in Chapters 3 and

Picture 18.4 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
			<p>Providing a spatial strategy without a full understanding of its past or present does not allow for a strategy with a clear spatial vision or direction, as such the plan fails to satisfy para 20 of NPPF.</p> <p>Historic environment within GM has its own challenges which need identifying in this section as they are part of the wider context for the plan.</p> <p>Risk Category = Medium</p>	<p>A brief description of some of the key issues that are present within GM affecting the historic environment would help ensure weight being given to addressing them.</p>	<p>4. The evidence base for these, and the whole plan, is provided within multiple documents, which are available on the GMCA website. A detailed spatial portrait as suggested would be more appropriate in local plans which can focus on locally distinctive characteristics. It would not be appropriate for such a detailed 'portrait' to be provided in a plan such as the PfE, in fact there could be a risk of not being able to identify all the locally distinctive characteristics and therefore such an approach could be counterproductive. As with chapter 1, this chapter doesn't include policies and therefore will have little, if any direct impact on decision making. It is unclear how the current drafting of the chapter would lead to an unsound plan.</p>
Chapter 3: Our vision	The potential of the historic environment to shape GM is not recognised or referenced in the vision.	Production of a Historic Environment Topic Paper	<p>The vision lacks a spatial dimension and this chapter neither recognises nor acknowledges that the historic environment should play a role in the vision to make GM, as the GMSF, one of the best places in the world.</p> <p>Without mention of the historic environment, any plans or strategies that flow from the GMSF may not give it equal weight in comparison to the economy or housing.</p> <p>The lack of a distinct objective on the historic environment and placing it within an objective on transport and infrastructure weakens its role and importance.</p> <p>The objective regarding heritage only refers to need to enhance heritage assets.</p> <p>Plan fails to satisfy paras 11 and 20 of NPPF.</p> <p>Risk Category = High</p>	<p>Historic environment should be integrated within the vision.</p> <p>A specific objective on the historic environment and place is needed.</p>	<p>From the outset in terms of plan preparation, it was decided that the PfE (and the Greater Manchester Strategy (GMS)) The driving force behind the plan is to assist the delivery of the GMS Vision. Adopting a shared vision enables the PfE to be the spatial expression of the GMS in the nine districts and will therefore assist in delivering the collective ambitions of the nine districts. This approach has been welcomed by others in previous consultations and is considered to be in accordance with NPPF.</p> <p>Objective 4 sets out to maximise the potential arising from our assets. Specific mention is made in one of the sub-clauses of this objective to enhancing heritage assets. It is unclear how a shared collective vision and the objectives as drafted mean the Plan is contrary to paras 11 and 20 of NPPF.</p>
Chapter 4: Our Strategy	The potential of the historic environment to shape GM is not recognised or	Production of a Historic Environment Topic Paper	<p>The historic environment does not feature as part of the strategy for the future of Greater Manchester. The GMSF fails to recognise or acknowledge that the historic</p>	<p>Strategic policies need to embed historic environment within them. Taking elements of the Topic Paper for each</p>	<p>Multiple references have been made to the historic environment in Chapter 4, since the GMSF 2019. The references are not locally distinctive as the PfE is a high-level plan, however references are made in the places suggested. These can in turn be used at</p>

2

Picture 18.5 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments referenced in the strategy.	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
			<p>environment can contribute meaningfully to the achievement of the full range of economic, social and environmental objectives for the area.</p> <p>In addition, the Policies GM-Strat 1 to 14 includes a range of policies that provide additional detail to the strategy set out in the first half of this chapter.</p> <p>As the historic environment does not feature as part of the Plan's strategy, this is reflected in lack of reference to it within the individual policies.</p> <p>This could put at risk the future of the area's heritage assets and also fails to ensure that the area's unique character and identity is sustained. Does not conform to the NPPF para 20 and 185.</p> <p>There is no clear evidence that the conservation and enhancement of it will be a strategic priority for the Plan or the Combined Authority.</p>	<p>relevant area. For example, northern competitiveness and the regeneration of mills. The city centre and the protection of its industrial heritage, legacy of warehouses and commercial buildings that give it its identity.</p>	<p>the local level in both plan making and decision making.</p> <p>It is unclear why further changes are required to make the plan sound.</p>
Chapter 5: A sustainable and resilient GM	As the historic environment has not been appropriately acknowledged or considered in the previous sections the document does not meet the tests of delivering sustainable development.		<p>Risk Category = High</p> <p>Concern that strategic link between historic environment and sustainable development policies is missing. The GMSF currently fails to give historic environment equal weight to other matters in sustainability.</p> <p>Risk Category = Medium</p>	<p>An appreciation of GIMs heritage should be considered in all parts of the plan and run continuously throughout the GMSF.</p>	<p>As acknowledged by Historic England, references to the historic environment evidence are included in the Plan, including to the topic paper. However, it is not considered that it is necessary or appropriate to include such references throughout the Plan. Such an approach would not be consistent with other policy areas and it is important to remember that the Plan should be read as a whole. It is unclear how not including references to the heritage evidence base in multiple policies, makes the plan unsound/inconsistent with NPPF.</p>
Chapter 5: Carbon & Energy	The policy linked to retro fitting existing built stock doesn't flag sensitivities linked to designated assets.		<p>Policy GM-S 2 promotes the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy without making it clear that there are instances where this will not apply as stated in Part L of The Building Regulations. Therefore, without this, the spatial framework fails to safeguard the historic environment in Greater Manchester.</p>	<p>Historic environment needs embedding within policy GM-S 2, this includes recognising the role that existing buildings can contribute to tackling climate change over the lifetime of a building, also the exception against part L in certain cases for heritage assets</p>	<p>Development plan documents should not repeat national policy, therefore where exceptions exist to matters such as part L of the building regs, this would be taken into consideration at the decision-making stage. Again, it should be remembered that plans need to be read as a whole. Policy JP-P2 now includes reference to exploring opportunities to reduce greenhouse gas emissions, in direct response to Historic England comments to the GMSF 2019, it is therefore not considered</p>

3

Picture 18.6 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfC Response
Chapter 5: Resilience	This section does not flag sensitivities linked to designated assets.		<p>Risk Category = Low</p> <p>Measures for resilience can have both visual and physical impacts on the historic environment. It is therefore necessary to consider the impact on character and appearance and historic fabric including ground surfaces and underground archaeology. <u>Often</u> they will require planning consent in addition listed building or scheduled monument consent.</p> <p>Risk Category = Low</p>	Ensure that policy GM-S 4 is appropriately worded to include exceptions for historic assets or where additional requirements may be needed due to their impacts on sensitive locations	<p>necessary to make changes to this policy to ensure it is sound.</p> <p>It is not the role of a development plan to duplicate national policy in terms of what requires planning consent, this would automatically apply at the decision-making stage. The allocations in <u>PfC</u> have appropriate evidence underpinning them in terms of impact on historic environment. Individual district local plans will undertake similar evidence as necessary for their local allocations. Additionally, Policy JP-P2 sets out the process to be followed in relation to development proposals which affect designated heritage assets and/or <u>where</u> archaeological assets. The Plan should be read as a whole, therefore to duplication in this policy is unnecessary.</p>
Chapter 5: Flood Risk and water management	This section does not identify sensitivities linked to designated assets.		<p>Policy lacks reference to historic environment.</p> <p>Changes to the management of the water environment can affect the historic environment this includes <u>SUDS</u>, changes in land management, abstraction and changes in groundwater flows, modification or removal of weirs, changes such as de-canalisation or re-cutting old meanders, flood resilience.</p> <p>Potential impact on non-designated assets of archaeological importance within and near to the water environment.</p> <p>All measures can impact on heritage assets and their setting.</p> <p>Fails to satisfy para 185.</p> <p>Risk Category = Low (provided that non-designated heritage assets are dealt with in more detail under the historic environment policy)</p>	Policy GM-S 3 needs to be more specific on the protection of heritage assets designated and non-designated in relation to proposals for flood and water management infrastructure and land management.	<p>The allocations in <u>PfC</u> have appropriate evidence underpinning them in terms of impact on historic environment. Individual district local plans will undertake similar evidence as necessary for their local allocations. Additionally, Policy JP-P2 sets out the process to be followed in relation to development proposals which affect designated heritage assets and/or <u>where</u> archaeological assets. The Plan should be read as a whole, therefore to duplication in this policy is considered unnecessary.</p>
Chapter 6: A Prosperous Greater Manchester	It does not set out how the historic environment will be capitalised on to create a prosperous future through	Agreement to commission of GM mills strategy.	<p>There is an absence of understanding of the role of the historic environment within the economy within this chapter.</p> <p>No mention re mills. Research by HE and University of Salford identify the</p>	Chapter needs to demonstrate how opportunities for the historic environment can be maximised including encouraging tourism, in the	<p>The Plan should be read as a whole duplication of details provided in both the policy text for JP-P2 and its justification text is considered unnecessary.</p> <p>Specific references to Greater Manchester's industrial heritage, including the mills, is set out in JP-P2. District local plans will provide the locally</p>

4

Picture 18.7 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
	conserving and enhancing assets, promoting them through tourism, heritage lead regeneration & vibrant high streets. There is also no reference to mills and the opportunity they pose.		Importance of these assets to the economy and new housing. Needs to demonstrate how it will conserve and enhance the historic environment and maximise opportunities from it including encouraging tourism, in the re-use of heritage assets, in creating successful places for businesses to locate and attract inward investment, town centres and for heritage-led regeneration. Fails to recognise historic environment as a strategic priority (NPPF para 20), does not set a positive strategy (para 185).	re-use of heritage assets, in creating successful places for businesses to locate and attract inward investment, town centres and for heritage-led regeneration. The role of mills in regeneration of GM needs to come through.	distinctive important heritage characteristics. Duplication is not considered necessary to make the plan sound.
Chapter Seven: Homes for Greater Manchester	Chapter fails to promote local character and distinctiveness, which is strongly derived from the historic environment. There is also no reference to mills and the opportunity they pose.	Agreement to commission of GM mills strategy	Risk Category = Medium This section does not acknowledge the importance of the historic environment to neighbourhoods and communities. Policy GM-H 3 only makes passing reference to the need to contribute to local distinctiveness, and only in relation to innovative design. New housing should relate to local distinctiveness, existing context and local characteristics such as materials. GM-H 4 does not provide a balanced approach to new housing density and provides more emphasis on setting minimum requirements. As granted it appears to suggest that these development densities are set and that any amendments would need clear justification and not compromise the overall delivery of homes. The policy suggests that where more than one density applies to a site then the highest should be used with no account taken of site characteristics other than location. The policy needs to be amended to ensure that the policy starts with what defines development densities and not the actual density itself.	Make it clear that all new housing should contribute to local character and distinctiveness. Incorporate references to the opportunity for mills to deliver new uses including housing and employment. Plan needs a more refined approach to density which takes account of local character and distinctiveness. Plan needs to be supported by evidence to support the approach taken on density. The plan seeks to set standards without an appropriate evidence base to determine if the proposed standards are suitable. This evidence base should consider impact on historic character amongst other considerations.	The PfE sets out to use land efficiently to reduce the overall amount of Green Belt and greenfield land being developed. Whilst this policy sets out an expectation that the densities will be applied to all new development, the policy correctly enables exceptions to be made, in particular where site specific heritage issues arise. Reference is made in JP-P2 to a range of important local characteristics and again in the Strategy chapter. Where there are specific locally distinctive issues, these would be more appropriately identified at the local level. It is considered that this policy and the plan as a whole, it supported by appropriate evidence to justify its approach.

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Picture 18.8 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PRF Response
			<p>The absence of textile mills from the plan is a significant missed opportunity for regeneration and enhancement. Given the emphasis on brownfield development within the GMSF, we would expect the plan to have done more to deal with this issue.</p> <p>Policies do not satisfy para's 185 (positive strategy), and para's 122-123 and 127 regarding density.</p> <p>The plan fails to recognise/acknowledge historic environment as a strategic priority (para 20).</p>		
<p>Chapter 8: A Greener GM</p> <ul style="list-style-type: none"> Landscapes The Green and blue infrastructure and urban green space 	<p>Chapter does not recognise the importance & potential of planned greenspace such as parks or canal networks.</p>		<p>Risk Category = Medium</p> <p>The value of landscape character assessment is recognised within this chapter but it is not applied appropriately within Policy GM-G 1. The policy is written in a way that landscape stops at urban edge and fails to recognise urban development overlays historic landscape.</p> <p>GM-G 6 and the supporting text appears to provide a better holistic policy than GM-G 2. GM-G 2 needs to be stronger and recognise GI assets can be heritage assets in own right. Cultural importance of green and blue assets needs to come through in GM-G 2 and GM-G 3. Heritage assets associated with man-made and natural water bodies should be integral to GM-G 3.</p> <p>GM-G 6 and supporting text, needs clarity regarding brownfield preference to ensure protection of industrial heritage.</p> <p>Figure 8.2 identifies priority green infrastructure but does not appear to be supported by evidence.</p>	<p>Policy GM-G 1 can be amended through minor amendments to strengthen protection for historic landscape character.</p> <p>Amendments to policy GM-G 2 to reflect that heritage assets can be green infrastructure.</p> <p>Cultural importance of green and blue spaces in Greater Manchester, including their historical and cultural significance of places and the opportunities they present for cultural activities needs to be better reflected both within Policy GM-G 2 and GM-G 3, and the GMSF as a whole.</p>	<p>The Plan should be read as a whole duplication of details provided in both the policy text for JP-P2 and its justification text is considered unnecessary. For example JP-P2 makes specific reference to the canal network. Additionally policy JP-S1 establishes the preference for brownfield land. It would be more appropriate for individual local plans to identify the locally distinctive assets within their areas, the PRF is a strategic document.</p>

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Picture 18.9 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
Chapter 8: Uplands, low: lands, peats and mosses	This section does not recognise these environments have extensive archaeological potential, showing how early predecessors lived and work.		<p>Plan lacks understanding with regards cultural heritage and GI including river valleys. Much of the historic environment and historic growth of Manchester related to access to water.</p> <p>GMSF fails to recognise the value of planned green spaces that are not natural, needs to be more reference to historical and cultural opportunities.</p> <p>Plan could present risk to historic landscape character, designated and non-designated landscapes.</p> <p>Policies in this section fail to satisfy para 185 NPPF (setting a positive strategy for the historic environment).</p> <p>Risk Category = Low</p> <p>Lack of policy and evidence base concerning archaeological potential of these areas. Risk to highly important archaeology. It is not only the ecological value of sites that needs to be considered, equally important is geodiversity, which needs to be included in any assessment of site potential.</p> <p>The supporting evidence is poor on geodiversity in relation to Policy GM-G 10 (GM-G 9 in the 2020 draft plan) as it entirely concentrates on agricultural land and its soil resource (Para 5.53). Peat deposits should be mentioned here as an important geodiversity asset, not all of which are designated as SSSIs or RIGs.</p> <p>Often geodiversity scale impacts may be cross boundary and therefore role for GMSF.</p> <p>Risk Category = Low</p>	<p>The evidence base, including that for allocations, should consider impacts on geodiversity.</p> <p>The policy and supporting text need amending to reflect important geodiversity within GM.</p> <p>Peats can contain proxy evidence for climate and sea-level change, vegetation and land use and early settlements and activity <u>stems</u>, including in the uplands, many mortuary and funeral monuments. Within bullets 3 and 5 of Policy GM-G 5, this needs to be caveated.</p> <p>Working with, and not against, the historic environment can have the potential to utilise it in a</p>	<p>Chapter 8 and specifically these policies and their justification text have been amended to include some of the proposed changes, however it would be more appropriate for individual local plans to identify many of the locally distinctive landscapes, the <u>PfE</u> is a strategic document. Additionally, as the plan must be read as a whole, it is not considered necessary to make all the changes proposed as this would cause unnecessary duplication.</p>

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Picture 18.10 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
Chapter 9: A GM for everyone	The historic environment is a key component of GM and the lack of consideration means the GMSF doesn't set out a positive strategy for the historic environment, so fails to result in sustainable development.	Production of a Historic Environment Topic Paper	Policy GM-E 1, a general but key place making policy, currently only states that development should respond to the historic environment. The wording is vague with little detail how this should be achieved. In terms of <u>place</u> , it is difficult to see how the limited reference to local identity can be delivered without this being reflected within the Frameworks overall strategy, evidence base and policies. The historic environment policy GM-E 2 does not provide a suitable substitute for the absence from this policy.	positive way to enhance current conditions. This should be better reflected within the policy, in particular bullet 5. The supporting text also needs to be enhanced in view of the above, and in addition it is worth stating that it is not just the industrial archaeology of the uplands that is important, as stated in Para 8.20 (para 8.32 in the 2020 draft plan). Provide more detail within the policy on the role the historic environment has in place making. Changes in NPPF place more importance on design and should be reflected in Plan. We provided suggested track changes in September 2020 to Policies GM-E 1 and its supporting text. The majority of these changes were not incorporated but to date no justification has been provided.	The issues covered in the suggested changes which have not been made to this policy are covered elsewhere in the plan. However, those which were not considered to be adequately covered elsewhere and/or would be more appropriate to be included in this policy have been made. The Plan should be read as a whole, therefore to duplicate all elements in this policy is not considered necessary to ensure that the plan meets national policy and guidance
Chapter 9: Historic Environment	The GMSF does not set out a positive approach to sustaining the historic environment due to insufficient evidence base or a positive policy provision.	Production of a Historic Environment Topic Paper & HIA on relevant sites.	Risk Category = Medium The plan seeks to delete heritage policies in full or in part from GM LPAs plans. The deletion of local plan policies on historic environment, even if these are dated such as Bury or Bolton, leaves a policy vacuum and insufficient policy strength for decision makers until new local plans are adopted which may take several years. The lack of a detailed reasoned justification to the policy leaves it unclear as to how elements of the	We welcome the production of the topic paper & some improvement to policy. However, there are still some issues to be resolved. Remove deletion of heritage policies from GMSF.	The reference to replaced local plan policies refers to where the PfE policies would duplicate or supersede policies in district local plans. It is important to understand that policies are not being deleted, they are being replaced and importantly many local policies remain valid and in place. This includes policies in relation to matters such as the historic environment. In these cases, the local plan policies will operate alongside the strategic policy framework provided by the PfE . The policies being replaced are the equivalent strategic level policies in the PfE , normally Part 1 UDP policies or Core Strategy policies.

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Picture 18.11 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
			<p>policy should be implemented by LPAs.</p> <p>There is a lack of local distinctiveness within the policy tying together the key strategic themes for the historic environment set out within the topic paper such as mills, heritage at risk, transport infrastructure. Whilst changes have been made they are not specific.</p> <p>Heritage is grouped within the section that covers retail and leisure uses in town centres.</p> <p>Policy wording is in places out of line with NPPF, see proposed track changes. Does not provide provision for non-designated assets.</p> <p>Fails to accord with paras 20 and 185 of NPPF.</p> <p>Risk Category = High/Medium</p>	<p>Expand reasoned justification so it is clearer how this policy should be implemented.</p> <p>Add strategic historic environment priorities to the policy.</p> <p>We provided suggested track changes in September 2020 for Policies GMA-E 2 & 3. The version presented to AGMA in October 2020 in large parts takes on board these suggestions but not all.</p> <p>Further suggestions were presented by HE in March 2020. It is understood that these will be accepted.</p> <p>This leaves some discrepancy in position between our advice and the policy likely to be published for consultation. However, modifications through the course of examination and agreed through Statement of Common Ground may help minimise any outstanding objections.</p>	<p>Further changes were made to the PfE text in March 2021, following ongoing collaboration with HE. HE to confirm that the changes have indeed been made as expected.</p> <p>It is now unclear what further changes are required in order to make the policy sound.</p>
Chapter 9: Local character and good design	Policy doesn't go far enough to identify local distinctiveness or outline how it can positive shape development.	Production of topic paper.	<p>The GMSF does not go far enough to demonstrate how it will deliver the economic and housing needs for Greater Manchester whilst ensuring that high quality design that reflects the distinctiveness and local character of the various places in Greater Manchester.</p> <p>It is important that the key place-based issues identify the importance of how the historic environment can assist in</p>	<p>A new policy on culture is in the plan, we suggested track changes in September 2020, much of these changes were made to the policy although changes were not made to the reasoned justification.</p> <p>Needs to go further to demonstrate how it will deliver the economic and</p>	<p>The plan should be read as a whole. As set out above, a number of changes have been made to the Strategy chapter to include specific reference to heritage assets. JP-P2 has been amended since 2019 to respond to HE's comments. It is not considered necessary or appropriate to include further references in the plan to the role of or impact on heritage assets in order to make the plan sound. Importance matters of local distinctiveness would be more appropriately brought out as necessary in district local plans, the PfE provides the overarching framework for an approach to managing the</p>

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Picture 18.12 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PIE Response
			<p>delivering the vision and the economic, social and environmental objectives for the Plan area. It should also recognise how the interrelationship between the conservation and enhancement of the historic environment and place making objectives can be achieved and supported through the rest of the Framework.</p> <p>An understanding of the local character and distinctiveness of an area including their historic context is essential to help deliver development that makes a real contribution to a place and its people.</p> <p>Disappointing that there are very few policies which address heritage, culture, design and local character and distinctiveness and it is not given the importance it deserves in a large urban area such as Greater Manchester.</p> <p>Risk Category = Medium</p>	<p>housing needs for Greater Manchester whilst ensuring that high quality design that reflects the distinctiveness and local character of the various places in Greater Manchester.</p> <p>Needs to identify the importance of how the historic environment can assist in delivering the vision and the economic, social and environmental objectives for the Plan area. It should also recognise how the interrelationship between the conservation and enhancement of the historic environment and place making objectives can be achieved and supported through the rest of the Framework.</p>	<p>relationship between development and the historic environment and its potential role.</p>
Chapter 10: a connected GM	Transport networks can often be key heritage assets, which should be reflected in policy.		<p>There is an absence of recognition that much of our transport infrastructure are heritage assets to their own right. This misses the opportunity that these assets can play in regeneration, and risks potential harm to transport heritage assets.</p> <p>Fails to take regeneration opportunities available that our historic transport facilities can offer as places of good quality and activity. Some of our most successful regeneration projects in recent times have focused on the transport infrastructure which are heritage assets.</p> <p>Risk Category = Low</p>	<p>Important to ensure that transport is properly integrated within the plan policies and that they allow proper assessment of all potential impacts on the historic environment to an appropriate level of detail.</p>	<p>Transport is properly integrated within the plan. The plan must be read as a whole, therefore, as with other policy areas, it is not necessary to duplicate policies. Where transport infrastructure is a heritage asset, policy JP-P2 will apply, together with relevant local policies but also national policies.</p>
Chapter 10: Streets for all	HE supports this policy, but considers it needs to be better supported by more		<p>Risk Category = Low</p> <p>The policy is good but needs supporting via improvements to the rest of the document.</p>	<p>No changes required</p>	<p>Noted</p>

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Picture 18.13 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
	robust heritage consideration throughout the rest of the plan.		Risk Category = Low		
Chapter 11 Allocations:	No HIA provided to support allocation.	HIA's were undertaken. The October 2020 version of the plan did not incorporate these adequately. Comments were put to the GMCA in March 2020. The GMCA subsequently put these to officers within LPAs in GM and got agreement for amendments.	If changes made in line with table provided by GMCA in April 2021, we would reserve our objections to site GMA3.1 Mapdock which we consider needs to be consistent with other sites across the plan. Risk Category = Low	Much of the changes we understand to be made would reduce our objections to a single site. This is a major step forward.	Noted. HE to confirm that the changes have indeed been made as expected
Chapter 12 Delivering the Plan	New comments based on October 2020 draft plan.		New comments: Paragraph 12.3 - Consider that this section should refer to working with statutory partners in delivering the plan including its environmental objectives, these partners include but are not limited to Historic England, Natural England and the Environment Agency. Doing this will help deliver sustainable development whilst achieving other objectives such as economic growth. Paragraph 12.24 - The monitoring framework has been set out for the first time in the October 2020 draft version of the plan. Under the Everyone section of Table 12.1 we are unclear why the indicator for conserve, sustain and enhance GM's historic environment and heritage assets is to "Increase % of buildings on the "at risk register" with a strategy for their repair and re-use." We assume that this is a typo and that the intention is to reduce the number of assets on the register. A more coherent indicator should be provided (see column to the right). From the Topic Paper there are also other actions that should be included in the monitoring framework, this includes	We request the insertion of Historic England alongside the other agencies and organisations identified under the first bullet point given our remit and statutory role for the protection of the historic environment. Amend the indicator for conserve, sustain and enhance GM's historic environment and heritage assets to "Reduce number of buildings on Historic England's Heritage at Risk Register through a strategy for their repair and re-use." Add the following additional indicator: "Increase up to date coverage of Historic Environment Record within GM."	Although these new changes do not appear to raise a soundness issue, it would seem acceptable to consider these changes as minor modifications, through the EIR process, assuming the panel of Inspectors was willing to do so.

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Picture 18.14 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)

Section of GMSF	March 2019 comments	Work undertaken	Impact and Risk	Suggested Solution	PfE Response
Appendix A	This is a new point as it did not form part of 2019 plan.		<p>working towards a better coverage for the Historic Environment Record within GM, including a reduction in backlog of files not entered.</p> <p>Risk Category = Low</p> <p>New comment HE disagrees with the deletion of policies in local plans for historic environment. The GMCA have mentioned that the GMSF is intended to be a high-level plan, therefore deletion of those policies in existing plans which are more locally specific is contrary to this approach and leaves a local policy vacuum in these areas (examples include policy CG3 in the Bolton Core Strategy, EN2 in the Bury local plan). Existing local plan policies on the historic environment should only be superseded once replaced as new local plans come forward post adoption of the GMSF.</p> <p>Risk Category = High</p>	Remove deletion of historic environment policies in existing plans as currently proposed.	The reference to replaced local plan policies refers to where the PfE policies would duplicate or supersede policies in district local plans. It is important to understand that policies are not being deleted, they are being replaced and importantly many local policies remain valid and in place. This includes policies in relation to matters such as the historic environment. In these cases, the local plan policies will operate alongside the strategic policy framework provided by the PfE. The policies being replaced are the equivalent strategic level policies in the PfE, normally Part 1 UDP policies or Core Strategy policies.

Picture 18.15 GMCA Response to Historic England's Comments and Suggested Amendments (September 2021)



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Our ref:
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Date 27th January 2022

Sent by email to Anne.Morgan@greatermanchester-ca.gov.uk

Dear Sir/Madam,

RE: Statement of Common Ground for the Places for Everyone Plan

Historic England has prepared this letter as a response to a request by the Greater Manchester Combined Authority (GMCA) to sign up to a Statement of Common Ground (emailed to Historic England on 14th December 2021).

Unfortunately, we are unable to sign the Statement of Common Ground for the following reasons.

Purpose of the Statement of Common Ground

Paragraph 27 of the revised National Planning Policy Framework (2021) requires strategic policy making authorities (in this case the GMCA) to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress made in cooperating to address these. Statements of Common Ground can help demonstrate the fulfilment of the Duty to Co-operate (as set out by Section 33A of the Planning and Compulsory Purchase Act) which requires plan making authorities to "engage constructively, actively and on an ongoing basis." Legislation identifies Historic England as a Duty to Co-operate partner¹.

Historic England's position on the Duty to Cooperate

GMCA has fulfilled its legal obligations under the Duty to Cooperate and we are not objecting on this point.

However, as you are aware, unfortunately there remain a number of substantive policy issues that we consider must be addressed for the Places for Everyone Plan to be found sound. These are set out in our representations to the Regulation 19 consultation on 1st October 2021 and appended to this letter for information. These

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013



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Picture 18.16 Historic England's PfE Statement of Common Ground Position



issues relate to the soundness of the Plan only and not the legal requirements of the Duty to Cooperate, there being no requirement to find agreement as part of the Duty.

Problems with the Statement of Common Ground

We have concerns with the drafted Statement of Common Ground (received by email 14th December 2021).

In our opinion, it doesn't accurately set out the current position between both parties. It also lacks detail in respect of the outstanding issues and areas of mutual agreement with the Plan relating to a positive strategy for the historic environment.

We still remain to hear in writing how the GMCA intends to respond to our representations made at the Regulation 19 publication consultation. This is critical to our understanding of how matters may be resolved and how the GMCA intends to progress these comments through the course of the Examination in Public; for example, by suggesting main modifications to the Plan.

Our suggested way forward

We support the principle of signing a Statement of Common Ground with the GMCA that sets out in detail matters of agreement/disagreement. Should the document be amended to set out the outstanding issues on the Plan and the GMCA's response to these then we would be able to sign up to the document.

Alternatively, and our preferred way forward, a separate Statement of Common Ground could be drafted, either by the GMCA or Historic England. Best practice is to include a table providing a response to the representations made through the consultation of the Plan in October 2021. We enclose the tables prepared for information.

It would be helpful if you were able to confirm at the earliest opportunity your position on this, so that we are able to provide some clarity and certainty on any outstanding matters for the Inspector as the Plan progresses to EIP.

Yours sincerely,

MR HENRY CUMBERS

Henry Cumbers
Historic Environment Planning Adviser
Historic England
Telephone: [REDACTED]
e-mail: henry.cumbers@historicengland.org.uk



BESSIE SURTEES HOUSE 41-44 SANDHILL NEWCASTLE-UPON-TYNE NE1 3JF
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HistoricEngland.org.uk



Picture 18.17 Historic England's PfE Statement of Common Ground Position

18.7 Individual Log of Collaboration and Signing Sheet

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Blackburn with Darwen Borough Council

Blackburn with Darwen is a PfE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Blackburn with Darwen.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Blackburn with Darwen and discussed development plan updates, SHMA and housing market areas, cross boundary transport issues.

Blackburn with Darwen expressed concern about the impact of increased commuting on already constrained transport links into Greater Manchester. They raised the issue of the impact of growth in PfE on cross boundary routes, both road and public transport.

The Objectively Assessed Development Needs consultation ran from September to November 2014. Comments received from Blackburn with Darwen were supportive of the GMCA approach to the objectively assessed needs.

During the Vision Strategy and Strategic Growth Options stage the GMCA met with Blackburn with Darwen and transport accessibility was identified as the most significant issue. Comments supported the scope and vision of the GMSF. They raised issues around the M65 corridor and improved rail connectivity.

During the preparation of the Draft GMSF stage, Blackburn with Darwen sought support for a joint approach with Greater Manchester to establish commuting assumptions to feed into housing requirements modelling work. The GMCA sent an email asking Blackburn with Darwen if they were able to accommodate any of GMCA's employment and housing need. The GMSF Green Belt Assessment methodology was also shared with neighbouring authorities. Blackburn with Darwen responded with issues related to the economic growth planned in GM impacting on cross boundary commuting. At a meeting in early 2017 a range of Duty to co-operate matters were discussed: housing OAN; sustainable transport connectivity; increased commuting rates to GM. These comments were reiterated in the

Picture 18.18

formal response from Blackburn with Darwen, particularly the need to understand cross border transport issues.

At the Revised Draft stage comments were received which largely related to cross boundary transport matters. Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Blackburn with Darwen responded indicating they were unable to accommodate any growth.

In September 2020, Greater Manchester authorities, the GMCA and TfGM met with a number of neighbouring authorities including Blackburn with Darwen to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Blackburn with Darwen was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. Blackburn with Darwen submitted no comments during the formal Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.19

Blackburn with Darwen Borough Council


I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Blackburn with Darwen Borough Council
Name	Helen Holland
Position	Head of Growth & Development
Signature	
Date	20 th December 2021

Picture 18.20

Places for Everyone Submission Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Organisation : Bury Clinical Commissioning Group

Bury Clinical Commissioning Group is a PFE duty to co-operate body and has been engaged with the preparation of the Plan. Detailed duty to co-operate activities are set out in the PFE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration. A summary is provided below.

At the Draft GMSF stage, Bury Clinical Commissioning Group sought recognition of how essential Section 106/Community Infrastructure Level Contributions are to secure support for proposals in the GMSF. To ensure continued collaboration with the CCG's the PFE Statement of Common Ground includes reference to Infrastructure Implementation and refers to JP-D1 promoting collaboration and synchronisation of investment plans between the nine PFE districts and the main infrastructure providers such as the Clinical Commissioning Groups and wider NHS.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.21

Bury Clinical Commissioning Group

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
14	Infrastructure Implementation

Organisation	Bury CCG
Name	Sam Evans
Position	Executive Director of Finance
Signature	
Date	10/02/2022

Picture 18.22

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log and

Neighbouring Authority : Calderdale Council

Calderdale Council is a PFE neighbouring authority and, as such, a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Calderdale.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Calderdale and discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

At the Vision, Strategy and Strategic Growth Options consultation stage, which took place between 9th November 2015 and 11 January 2016 the Calderdale sought continued collaboration on cross boundary green infrastructure issues.

During the preparation of the Draft GMSF stage, the GMCA sent an email asking Calderdale if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including Calderdale. At a meeting in December 2016 Calderdale noted that transport improvements will support commuters from Calderdale to Greater Manchester.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Calderdale attended. The event provided an update on the GMSF and the position on evidence. At the Revised Draft GMSF Calderdale made no formal response.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Calderdale responded indicating they were unable to accommodate any growth.

In September 2020, GM authorities, the GMCA and TfGM met with a number of neighbouring authorities including Calderdale to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was work done to assess the transport impact of new allocations and the existing land supply and updates to the 2040

Picture 18.23

Transport Strategy and final 5-Year Delivery Plan. It also included a GMSF timeline and GMSF Overview. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Calderdale was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

At the start of the PfE Publication consultation in August 2021, an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. During the PfE Publication consultation a meeting was held between West Yorkshire Combined Authority, Kirklees, Calderdale, GMCA, TfGM, Oldham and Rochdale to discuss cross boundary matters. A presentation was given providing an overview and Timetable of the PfE, Transport Modelling, HRA and Duty to Co-operate/Statement of Common Ground. Calderdale submitted no comments to the PfE during the Publication consultation.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.24

Calderdale Council

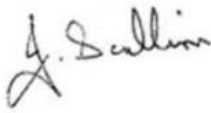
I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Calderdale Metropolitan Borough Council
Name	Councillor Jane Scullion
Position	Deputy Leader
Signature	
Date	7 th January 2022

Picture 18.25

Places for Everyone Submission Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Cheshire East Council

Cheshire East is a PfE neighbouring authority and, as such, a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Cheshire East.

The Formative stages of the plan involved collaboration with neighbouring authorities 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.

The Objectively Assessed Development Needs consultation ran from September to November 2014. Comments were received from Cheshire East related to population projections and migration assumptions.

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 and the GMCA expressed support for the update.

During the preparation of the Draft GMSF, the GMCA sent an email asking Cheshire East if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including Cheshire East. In response to the Draft GMSF Cheshire East sought stronger wording on transport and linkages, specifically in relation to Transport 2040 and the SEMMMs refresh. Detailed comments are set out in the Duty to Co-operate Statement and Log of Collaboration.

During the period between the Draft GMSF and the Revised Draft GMSF, the refresh of the SEMMMs study began in 2017 and Cheshire East attended various workshops. The SEMMMs study 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.

Picture 18.26

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Cheshire East attended. The event provided an update on the GMSF and the position on evidence. Formal comments to the Revised Draft GMSF focused on concern about Airport growth and impact on climate change, Cheshire East's Visitor Strategy (Hotels at Airport City). It also raised green Infrastructure links across boundaries and ensuring joined up plans ie HS2 & Airport. Comments were raised on a number of sites including Manchester Airport and other sites falling into the Stockport boundary, which is no longer part of the joint plan.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Cheshire East responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA, TfGM and neighbouring authorities, including Cheshire East to discuss transport evidence and other duty to co-operate matters. 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. A summary of the meeting with Cheshire East can be found in the Duty to Co-operate Statement and Log of Collaboration. Following the move to the PFE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021, asking if Cheshire East was able to accommodate any of the PFE growth in housing and employment. The response confirmed the previous position that this was not possible.

In July 2021, a second meeting to discuss cross boundary issues took place and focused on a number of transport matters, including updates to the modelling following Stockport's departure from the joint planning process and public transport cross boundary links. Cheshire East confirmed that following the departure of Stockport from the joint plan, the most significant allocations are Timperley Wedge/Medipark and Global Logistics.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. An exchange of emails and conversations took place about the reference to cross boundary transport routes and minerals and waste in the Statement of Common Ground and Duty to Co-operate Statement & Log of Collaboration. This has been dealt with through amendments to these documents. Cheshire East submitted no comments during the formal PFE Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.27

Cheshire East Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport
13	Manchester Airport

Signature

Organisation	Cheshire East Council
Name	David Malcolm
Position	Head of Planning
Signature	
Date	21 December 2021

Picture 18.28

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Log of Collaboration

Local Authority : Cheshire West & Chester

Cheshire West and Chester does not share a contiguous border with the PfE Plan and is not a neighbouring authority, however, we do recognise that the issue of minerals and waste has a wider strategic impact and have decided to deal with this as part of the Statement of Common Ground. Set out below is a summary of the collaborative activities to date and the current position between the PfE districts and Cheshire West and Chester in relation to minerals and waste.

Cheshire West and Chester made comments to the Revised Draft GMSF related to the need to provide an evidence base for minerals supply to support the GMSF and whether a review of the Greater Manchester Joint Minerals Local Plan was required.

During the PfE Publication consultation, a meeting took place with Cheshire West and Chester. They raised concerns about planned growth through PfE on demand for minerals and how this might impact on Cheshire West and Chester. A similar point was made about waste but also reflecting the move to a more circular economy and the need to understand changes in waste flows and disposal. They are seeking reassurance that both issues will be explored further and that the wording in the Sof CG should reflect a commitment to consider this matter in the future

At the Publication stage, comments were received reflecting the comments above and raising the lack of minerals and waste policies in the PfE Plan. A request was made for a review of both the GM Joint Minerals Local Plan and GM Joint Waste Local Plan.

Further meetings took place between the end of the Publication and Submission of the PfE concerning the need for a GM Minerals Local Plan Review. GMCA acknowledge the concerns raised by CWaC and are going to request that the PfE districts make a commitment to update the GM Joint Minerals Local Plan following the PfE Plan. This would be reflected in their Local Development Schemes. All parties agreed this was a way forward to meet these concerns.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.29

Cheshire West and Chester Council


I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
2	Minerals and Waste

Signature

Organisation	Cheshire West and Chester Council
Name	Rob Charnley
Position	Head of Planning
Signature	
Date	03/02/2022

Picture 18.30

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Chorley Borough Council

Chorley is a PfE neighbouring authority and, as such, a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Chorley.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Chorley and discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

During the Vision, Strategy and Strategic Growth Options stage, 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 authorities, including Chorley. Chorley Council confirmed they could not accept any additional housing to meet Greater Manchester's Objectively Assessed Need.

Following this, the GMCA emailed confirming a willingness to hold a follow up 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 having cross boundary implications.

At the Vision, Strategy and Strategic Growth Options consultation stage, Chorley stated they had no objection to the scope of the work in Greater Manchester. They supported Growth Option 2 because of the evidence on objectively assessed need for housing and accelerated growth scenario. They stated they were 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.

During the preparation of the Draft GMSF, the GMCA sent an email asking Chorley if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including

Picture 18.31

Chorley. At a meeting in 2016 a range of Duty to co-operate matters was discussed including net out migration, commuting and updating the Gypsy Travellers Accommodation Assessment. In their formal comments, Chorley reiterated they were unable to accommodate any of GMSF's housing or employment growth. They also repeated the need for an update to the Gypsy Travellers Accommodation Assessment.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Chorley attended. The event provided an update on the GMSF and the position on evidence. Comments received at the Revised Draft GMSF stage stated Chorley were unable to accommodate any of GM's housing or employment growth. They also sought further information on gypsy and travellers and how this was going to be dealt with in the GMSF.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Chorley responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA, TfGM and neighbouring authorities including Chorley to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Chorley was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

A further meeting took place in July 2021 to 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. The issues discussed included: an update on PfE and timetable; transport evidence; Chorley Local Plan, Places for Everyone - Duty to Co-Operate Statement and Log of Collaboration; transport between Chorley and Bolton; railway link between Preston and Bolton/Manchester; growth options being prepared for Chorley.

At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters.

Chorley submitted representations to the PfE Publication seeking ongoing engagement related to cross boundary transport services. They sought an addition to the Statement of Common Ground clarifying that each district will be addressing gypsies, travellers and travelling showpeople. They also welcomed that the PfE is meeting its own housing need.

Picture 18.32

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.33

Chorley Borough Council


I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Chorley Council
Name	Jonathan Noad
Position	Director of Planning and Development
Signature	
Date	06/01/22

Picture 18.34

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Derbyshire County Council and High Peak Borough Council

Derbyshire County Council and High Peak Council, are PfE neighbouring authorities and, as such, duty to co-operate bodies. They have been consistently engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Derbyshire County Council and High Peak Borough Council.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with High Peak. The meeting discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

The Objectively Assessed Development Needs consultation ran from September to November 2014. High Peak raised concerns about the impact of growth on commuting patterns and transport routes from High Peak to Greater Manchester.

At the Vision, Strategy and Growth Options stage which took place between 9th November 2015 and 11 January 2016, High Peak supported Growth Option 2, the preferred option. Derbyshire County Council requested working jointly with GM on potential infrastructure implications of future growth.

During the preparation of the Draft GMSF, the GMCA met with High Peak and discussed commuting patterns between High Peak and Greater Manchester, various transport routes and cross boundary landscape issues. Derbyshire County Council also raised the issue of minerals and waste and GM imports of crushed rock. It was agreed to monitor this through the Local Aggregate Assessment and maintain discussions through existing working groups. The GMCA also sent an email asking High Peak if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including High Peak. In response to the Draft GMSF, High Peak stated they were unable to accommodate any of GM's employment or housing need. They sought a Green Belt Review and continued joint working between Derbyshire County Council, High Peak and GMCA to understand the implication of growth in GM on various cross boundary transport routes. They supported the refresh of the

Picture 18.35

SEMMMs scheme and sought involvement in its preparation. Detailed comments are set out in the Duty to Co-operate Statement and Log of Collaboration.

During the period between the Draft GMSF and the Revised Draft GMSF, the refresh of the SEMMMs study began in 2017, Derbyshire County Council and High Peak attended various workshops. The SEMMMs study 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.

The Revised Draft GMSF included a new chapter called A Green Greater Manchester. These policy amendments were informed by comments made by High Peak.

At the Revised Draft GMSF, comments were made by High Peak. They were 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 it is 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. Various transport routes were highlighted as possibly being impacted through planned growth in GMSF.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. High Peak responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, TfGM, the GMCA and neighbouring authorities, including Derbyshire County Council and High Peak Borough Council, 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. A summary of the meeting with Derbyshire County Council and High Peak can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PFE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if High Peak was able to accommodate any of the PFE growth in housing and employment. The response confirmed the previous position that this was not possible.

Picture 18.36

At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date and offering to resolve any further outstanding Duty to Co-operate matters. Derbyshire County Council and High Peak Borough Council submitted no comments during the PfE Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.37

Derbyshire County Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Derbyshire County Council

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
12	Cross Boundary Transport

Organisation	Derbyshire County Council
Name	Chris Henning
Position	Executive Director Place
Signature	
Date	12 January 2022

Picture 18.38

Places for Everyone Submission Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log Public Body : Environment Agency

The Environment Agency is a PfE duty to co-operate body and has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Environment Agency. The Environment Agency are a member of the GM Planning and Housing Commission, which brings together public and private sector partners to help create a strategic framework that deals with housing, growth, infrastructure and town centres. It is an advisory body to inform policy and decisions and sits within the GMCA Governance Structure. The Commission have met regularly and since 2014 has considered relevant GMSF matters.

During the Objectively Assessed Development Needs consultation the Environment Agency stated the vision in the Greater Manchester Strategy should form the basis for the GMSF. The GMS Vision and PFE Vision are now one and the same confirming the role of the PFE as the spatial representation of the GMS.

At the First Draft GMSF, the Environment Agency made wide ranging comments seeking a stronger emphasis on making development sustainable, climate change resilient, promoting natural capital approach in GM and introducing targets for environmental policies.

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 needing to be considered.

Between 2018 and 2020 the Environment Agency engaged in weekly meetings with the GMCA and JBA Consulting to discuss the SFRA Level 1 and 2 Study and future climate change impacts. 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.

At the Revised Draft GMSF stage, the EA made a number of detailed comments. Summarised below are the key comments with regard to flooding and duty to co-operate:

Picture 18.39

- Level 1 SFRA – 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 SFRA 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.
- Flooding

The Environment Agency raised concerns about the need for flood risk evidence to support the PFE plan. 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 Environment Agency continue to have regular catch-up meetings to discuss water related planning matters.

During the PFE Publication consultation the Environment Agency submitted a response which outlined changes in national climate change guidance relating to flooding allowances. They stated that despite this change the SFRA Level 1 still represented a reasonable reflection of risks when compared against the updated Climate Change Guidance and is an appropriate approach based on the evidence at the time. They consider PFE sound for matters within their remit.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.40

Environment Agency

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment

Signature

Organisation	Environment Agency
Name	Malin Lindgren
Position	Sustainable Places Team Leader
Signature	<i>Malin Lindgren</i>
Date	14/12/2021

Picture 18.41

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Public Body: GM Local Enterprise Partnership

The PFE has a duty to co-operate with the GM Local Enterprise Partnership (GMLEP) but the (GMLEP) is not a duty to co-operate body. Detailed duty to co-operate activities are set out in the PFE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration. This summarises the position to date.

The GM LEP has been engaged with the preparation of the GMSF and PFE through the GMCA Governance structure. The GM LEP works in partnership with the GMCA to deliver joint strategic priorities in the Greater Manchester Strategy. Since 2015 it has received reports on the GMSF/PFE relating to the current position and any consultations.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date and offering to resolve any further outstanding Duty to Co-operate matters. GM LEP submitted no comments during the formal Publication consultation. A report was taken to the GM LEP providing an update on the Publication PFE and seeking a signature to the Statement of Common Ground in September 2021.

Detailed collaborative activities are set out in the PFE Statement of Common Ground and PFE Duty to Co-operate Statement with the Log of Collaboration for you to consider further. The form to sign the PFE Statement of Common Ground is set out below.

Picture 18.42

Greater Manchester Local Enterprise Partnership

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

Signature

Organisation	Greater Manchester Local Enterprise Partnership
Name	Lou Cordwell
Position	Chair of Greater Manchester Local Enterprise Partnership
Signature	
Date	19.11.2021

Picture 18.43

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Public Body : GM Local Nature Partnership (Natural Capital Group)

The PFE has a duty to co-operate with the GM Local Nature Partnership (Natural Capital Group) but the Natural Capital Group is not a duty to co-operate body. Detailed duty to co-operate activities are set out in the PFE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration. This summarises the position to date.

The Natural Capital Group has been engaged with the preparation of the GMSF and PFE through the GMCA Governance structure. The Natural Capital Group works in partnership with the Greater Manchester Green City Partnership which is responsible on behalf of the GMCA for overseeing the monitoring and delivery arrangements for the Greater Manchester 5 Year Environment Plan. Since 2015 it has received reports on the GMSF relating to the current position and any consultations.

The Natural Capital Group made comments to the Revised Draft GMSF and sought reconsideration of the green infrastructure opportunity mapping in light of a more comprehensive Nature Recovery Network. They also sought reference to biodiversity net gain in the policy A Net Enhancement of Biodiversity and Geodiversity rather than enhancement of biodiversity net gain which is not in accordance with Defra's definition.

The PFE Statement of Common Ground sets out the areas where continued collaboration is required and refers to the Natural Capital Group in the Green Infrastructure Statement.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date and offering to resolve any further outstanding Duty to Co-operate matters. Natural Capital Group (GM LNP) submitted no formal comments to the Publication consultation although they did comment on the Statement of Common Ground and they need for further discussion around peat and carbon neutrality going forward. This was in response to a report taken to the Natural Capital Group by the GMCA in October 2021 providing an update on the Publication PFE and seeking a signature to the Statement of Common Ground.

Detailed collaborative activities are set out in the PFE Statement of Common Ground and PFE Duty to Co-operate Statement with the Log of Collaboration for you to consider further. The form to sign the PFE Statement of Common Ground is set out below.

Picture 18.44

Greater Manchester Local Nature Partnership (Natural Capital Group)


I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statement my public body is signing are set out below:

Statement No.	Statement Title
6	Green Infrastructure

Signature

Organisation	Greater Manchester Natural Capital Group (LNP)
Name	Anne Selby
Position	Chair
Signature	
Date	12/11/21

Picture 18.45

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Derbyshire County Council and High Peak Borough Council

Derbyshire County Council and High Peak Council, are PfE neighbouring authorities and, as such, duty to co-operate bodies. They have been consistently engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Derbyshire County Council and High Peak Borough Council.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with High Peak. The meeting discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

The Objectively Assessed Development Needs consultation ran from September to November 2014. High Peak raised concerns about the impact of growth on commuting patterns and transport routes from High Peak to Greater Manchester.

At the Vision, Strategy and Growth Options stage which took place between 9th November 2015 and 11 January 2016, High Peak supported Growth Option 2, the preferred option. Derbyshire County Council requested working jointly with GM on potential infrastructure implications of future growth.

During the preparation of the Draft GMSF, the GMCA met with High Peak and discussed commuting patterns between High Peak and Greater Manchester, various transport routes and cross boundary landscape issues. Derbyshire County Council also raised the issue of minerals and waste and GM imports of crushed rock. It was agreed to monitor this through the Local Aggregate Assessment and maintain discussions through existing working groups. The GMCA also sent an email asking High Peak if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including High Peak. In response to the Draft GMSF, High Peak stated they were unable to accommodate any of GM's employment or housing need. They sought a Green Belt Review and continued joint working between Derbyshire County Council, High Peak and GMCA to understand the implication of growth in GM on various cross boundary transport routes. They supported the refresh of the

Picture 18.46

SEMMMs scheme and sought involvement in its preparation. Detailed comments are set out in the Duty to Co-operate Statement and Log of Collaboration.

During the period between the Draft GMSF and the Revised Draft GMSF, the refresh of the SEMMMs study began in 2017, Derbyshire County Council and High Peak attended various workshops. The SEMMMs study 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.

The Revised Draft GMSF included a new chapter called A Green Greater Manchester. These policy amendments were informed by comments made by High Peak.

At the Revised Draft GMSF, comments were made by High Peak. They were 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 it is 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. Various transport routes were highlighted as possibly being impacted through planned growth in GMSF.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. High Peak responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, TfGM, the GMCA and neighbouring authorities, including Derbyshire County Council and High Peak Borough Council, 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. A summary of the meeting with Derbyshire County Council and High Peak can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PFE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if High Peak was able to accommodate any of the PFE growth in housing and employment. The response confirmed the previous position that this was not possible.

Picture 18.47

At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date and offering to resolve any further outstanding Duty to Co-operate matters. Derbyshire County Council and High Peak Borough Council submitted no comments during the PfE Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.48

High Peak Borough Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

High Peak Borough Council

Statement No.	Statement Title
1	Flood Risk & the Water Environment
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	High Peak Borough Council
Name	Neil W. Rodgers
Position	Executive Director (Place)
Signature	
Date	11/01/2022

Picture 18.49

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Kirklees

Kirklees is a PFE neighbouring authority and, as such, is a duty to co-operate body to the PFE. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Kirklees.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Kirklees and discussed development plan updates, SHMA and housing market areas, cross boundary transport issues.

During the Vision, Strategy and Strategic Growth Options consultation stage Kirklees expressed concern that transpennine transport issues generated by the scale of growth in Greater Manchester had not been fully assessed.

During the preparation of the Draft GMSF stage, the GMCA shared the Green Belt Assessment methodology with neighbouring authorities including Kirklees. The GMCA also sent an email asking Kirklees if they were able to accommodate any of GMCA's employment and housing need. Kirklees confirmed they were unable to accommodate any of GM's growth.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Kirklees attended. The event provided an update on the GMSF and the position on evidence. At the Revised Draft GMSF Kirklees made no formal response.

Between the revised draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Kirklees responded indicating they were unable to accommodate any growth.

In the Autumn of 2020 the GMCA met with a number of authorities including Kirklees to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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

Picture 18.50

also included a GMSF timeline and GMSF Overview. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PFE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Kirklees was able to accommodate any of the PFE growth in housing and employment. The response confirmed the previous position that this was not possible.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. A request was made for a meeting and during the PFE Publication Consultation in Autumn 2021 a meeting took place between Kirklees, Calderdale and West Yorkshire Combined Authority to discuss PFE, transport modelling, HRA and Duty to Co-operate. Kirklees requested transport modelling data for the A640, A635 and A62 and TfGM provided this data post meeting.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.51

Kirklees Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Kirklees Council
Name	Cllr McBride
Position	Regeneration Portfolio Holder
Signature	
Date	29/11/21

Picture 18.52

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Lancashire County Council

Lancashire County Council is a PFE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Lancashire County Council.

The Objectively Assessed Development Needs consultation ran from September to November 2014. Lancashire County Council raised concerns that future demand for housing and employment sites in GM may place pressure on areas at risk of flooding. Since then, a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA) has been completed and a Strategic Flood Risk Management Framework (SFRMF) has been developed. The purpose of the GM SFRMF is to provide a spatial framework for FRM across Greater Manchester, highlighting the key strategic flood risks including cross-boundary issues within and outside Greater Manchester and recommending key priorities for intervention taking account of previous, existing and planned interventions delivered by Risk Management Authorities (RMAs).

At the Revised Draft GMSF, a GMSF Statement of Common Ground event was held in January 2019 and Lancashire County Council attended. The event provided an update on the GMSF and the position on evidence. At the Revised Draft GMSF, Lancashire County Council made comments about the Northern Gateway and increased travel demand between GM and Rossendale. They raised concern about the impact on the M66 as a result of increased congestion from Northern Gateway because the M66 is key to economic growth in Rossendale. They also raised the upgrade and electrification of the railway linking Manchester, Bolton & Preston. They wish to work with TfGM regarding growth in demand on this line to ensure there is capacity on the railway & trains.

In September 2020, GM authorities, GMCA and TfGM met with a number of neighbouring authorities including Lancashire County Council to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration. At the meeting, Lancashire County Council confirmed they are working on the Skelmersdale Rail link, connecting Skelmersdale into the rail network. They also confirmed they have agreed to contribute towards the Manchester North-West Quadrant Rail Study.

At the start of the PFE Publication consultation in August 2021, an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows

Picture 18.53

and offering to resolve any further outstanding Duty to Co-operate matters. Lancashire County Council submitted no comments during the formal Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.54

Lancashire County Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
12	Cross Boundary Transport

Organisation	Lancashire County Council
Name	Marcus Hudson
Position	Planning Manager
Signature	
Date	21/12/21

Picture 18.55

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Liverpool City Region

Liverpool City Region is a PFE neighbouring authority, and, as such, is a duty to co-operate body. It has been engaged with the preparation of the Plan since the City Region was formed in 2014. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Liverpool City Region.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Liverpool City Region attended. The event provided an update on the GMSF and the position on evidence.

In September 2020, GM districts, TfGM and the GMCA met with a number of neighbouring authorities including Liverpool City Region to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. A regular catch-up meeting took place during the consultation period. Liverpool City Region submitted a comment supporting the PFE Plan, including the various references to Liverpool and key locations within the Liverpool City Region and welcomed ongoing collaborative working with the PFE districts.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.56

Liverpool City Region


I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
2	Minerals and Waste
12	Cross Boundary Transport

Signature

Organisation	Liverpool City Region Combined Authority
Name	Jill Coule
Position	Chief Legal Officer
Signature	 <small>Jill Coule (Jan 4, 2022 15:56 GMT)</small>
Date	04 January 2022

Picture 18.57

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Log of Collaboration

Organisation : Manchester University Hospitals NHS Foundation Trust

Manchester University Hospitals NHS Foundation Trust is a PfE duty to co-operate body and has been engaged with the preparation of the Plan. Detailed duty to co-operate activities are set out in the PfE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration. The activities up to the Revised Stage are covered in detail in these documents. This summarises the position from the Revised Draft onwards.

At the Revised Draft GMSF stage Manchester University Hospitals NHS Foundation Trust submitted a number of comments in relation to duty to co-operate these related to seeking clarification regarding delivery options for the Metrolink Manchester Airport Line Western Leg Extension. Also, support was expressed for the wider Timperley Wedge development

At the Publication PfE stage Manchester University Hospitals NHS Foundation Trust submitted comments supporting Policy JP- P6 Health identifying the need for continued enhancement of hospitals and the proposed policy allocations for adjacent sites including MediPark and Timperley Wedge. In relation to your detailed representations at the Regulation 19 Stage these will be dealt with going forward through the Examination and in line with Regulation 22 we are producing a statement which will include a summary of the main issues raised together with a summary response to those main issues. However, as you will be aware, the precise process in relation to such matters will be determined by the Inspectors once the Plan has been Submitted.

In your comments, you seek continued collaboration between the PfE districts and Manchester University Hospitals NHS Foundation Trust, particularly in relation to wider infrastructure and the Timperley Wedge site. The PfE Statement of Common Ground includes reference to Infrastructure Implementation and refers to JP-D1 promoting collaboration and synchronisation of investment plans between the nine PfE districts and the main infrastructure providers such as the Clinical Commissioning Groups and wider NHS.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.58


Manchester University Hospitals NHS Foundation Trust

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
14	Infrastructure Implementation

Organisation	MANCHESTER UNIVERSITY NHS FOUNDATION TRUST
Name	MICHELE HUMPHREYS
Position	DIRECTOR OF STRATEGIC PROJECTS
Signature	
Date	14 FEBRUARY 2022

Picture 18.59

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : The Mayor of Greater Manchester

The Mayor of Greater Manchester Mayor, has responsibility for cross boundary matters in Greater Manchester and is a PFE duty to co-operate partner. Detailed duty to co-operate activities are set out in the PFE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration.

The Places for Everyone Plan 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. The Mayor of Greater Manchester is a "special interest" member of the Joint Committee of the Nine and as such is considered an additional signatory in terms of the PFE Statement of Common Ground. This Committee considers all substantial decision making matters relating to the preparation of Places for Everyone Plan. Previous iterations of the plan were approved through the AGMA/GMCA Joint Committee which was attended by the Mayor. The AGMA committee had delegated authority to prepare a joint plan prior to the move to the PFE Plan. Much of the evidence base supporting policies in the GMSF/PFE was reported through the GMCA governance structure.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

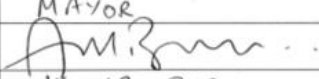
Picture 18.60

The Mayor of Greater Manchester

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

Signature

Organisation	GMCA
Name	ANDY BURNHAM
Position	MAYOR
Signature	
Date	14.12.2021

Picture 18.61

National Highways

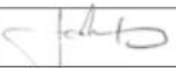
I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
11	Connected Places
13	Manchester Airport
14	Infrastructure Implementation

Signature

Organisation	National Highways
Name	John Hope
Position	Spatial Planning Manager (NW region)
Signature	
Date	10 th February 2022

Picture 18.62

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Duty to Co-operate Body : Natural England

Natural England is a PFE duty to co-operate body and has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Natural England.

Natural England is a member of the Natural Capital Group, which is Greater Manchester's designated Local Nature Partnership and sits within the GMCA Governance Structure. The Group meets bi-monthly and since 2014 has considered relevant GMSF/PfE matters.

At the Objectively Assessed Development Needs Consultation Natural England referred to a project identifying ecosystem service and pinch points across GM and stated this should be considered in the plan.

At the Vision, Strategy and Strategic Growth Options stage Natural England sought greater emphasis on the natural environment as they did not believe it was sufficiently represented and it would be beneficial to take a strategic view of GM's green infrastructure.

At the Draft GMSF, comments relate to a desire to see a stronger links between integrated networks of high-quality green infrastructure identified as priorities in the GMSF, the strategic locations and allocations. They suggested strategic policy should seek to achieve net gain for biodiversity, make greater reference to National and European protected sites, address impact of development on air quality and adopt the mitigation hierarchy.

Between the Draft GMSF and Revised GMSF, joint meetings were undertaken between each district, the Environment Agency, Natural England and United Utilities between 2017 and early 2018, on the emerging evidence base and concept planning for each allocation.

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 benefits and biodiversity net gain in the areas of wetland habitat restoration and creation to enable a functioning nature recovery network.

Since that point, considerable further work has been prepared to address these points and Natural England has 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.

At the Publication stage, Natural England raised concerns about the strength of the PFE thematic policies regarding development on peat, particularly in relation to JPA33 New Carrington, JPA29 Port Salford Extension and JPA28 North of Irlam Station. Natural England

Picture 18.63

stated that they do not support the principle of developing on peat and have concerns regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA.

Natural Capital Group recognised that engagement with the PfE process had been good. They did not seek specific amendments to the PfE but asked if the Statement of Common Ground could acknowledge the need for continued discussion and joint working on peat and carbon neutrality going forward.

Natural England also submitted comments stating that the PfE was unsound with respect to the HRA as the Air Quality Assessment report concluded that an Appropriate Assessment was required and at the time, it was incomplete and the scale of impacts unknown. Also, the availability of appropriate mitigation was unknown. Natural England stated: "Without this information it is not possible for PfE HRA to conclude that there will be no adverse impact on site integrity as a result of delivering the proposed growth in the Plan and the allocations are at risk of becoming undeliverable if the Habitats Regulations cannot be satisfied."

In response to Natural England's comments on the Publication PfE, the GMCA on behalf of the PfE districts, is continuing to work with Natural England to address their comments with further work on the HRA comprising:

- Assessing the 'in combination effect' on air quality from the PfE with Warrington Borough Council's Local Plan for the Manchester Mosses SAC;
- Assessing air quality impact on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA from the A57, A672 and A6024;
- Assessing air quality impact on the Rochdale Canal SAC.
- Assessing recreation impacts on the South Pennine Moors SAC, Peak District Moors (South Pennine Moors Phase 1) SPA and South Pennine Moors Phase 2 SPA.
- Securing mitigation measures in agreement with Natural England to alleviate adverse impacts on protected sites if the outcome of the assessments, noted in the bullet points above, indicate that mitigation is required.
- Liaising with United Utilities to confirm that wastewater can be managed effectively to ensure that there will be no adverse impact on the Mersey Estuary SPA.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Natural England

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

Picture 18.64

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
6	Green Infrastructure
8	Habitat Regulation Assessment

Signature

Organisation	Natural England
Name	Ginny Hinton
Position	Area Manager
Signature	
Date	09/02/2022

Picture 18.65

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Log of Collaboration

Public Organisation : NHS Property

NHS Property Services is not a PFE duty to co-operate body but some of the matters in the Statement of Common Ground relate to ongoing Collaboration so it was felt best to deal with then as part of the Statement of Common Ground.

At the Revised Draft GMSF stage NHS Property submitted support for Policy GM-E 5 Health which sets out a requirement, where appropriate, for the provision of new or improved health facilities as part of new developments that would significantly increase demand. They also support policy GM-D 1 which includes the explicit requirement for local authorities to collaborate with the NHS.

At the Publication PFE stage NHS Property submitted comments seeking an understanding of the need for flexibility particularly around change of use, when managing the NHS estate. They also said PFE would be improved if Policy JP-P 6 ensured that Health had access to a more equitable share of developer contributions.

The PFE Statement of Common Ground includes reference to Infrastructure Implementation and refers to JP-D1 promoting collaboration and synchronisation of investment plans between the nine PFE districts and the main infrastructure providers such as the Clinical Commissioning Groups and wider NHS.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.66

NHS Property

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
14	Infrastructure Implementation

Organisation	NHS Property Services
Name	Ari Akinyemi
Position	Town Planner
Signature	Ari Akinyemi
Date	03/02/22

Picture 18.67

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Peak District National Park Authority

Peak District National Park Authority is a PFE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Peak District National Park.

The Peak District National Park Authority (PDNPA) 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 PDNPA 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.

Oldham Council and PDNPA 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.

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.

Other duty to co-operate activities are set out below:

During the preparation of the Draft GMSF, the GMCA shared the Green Belt Assessment methodology with neighbouring authorities including PDNPA.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and PDNPA attended. The event provided an update on the GMSF and the position on evidence.

In September 2020, GM authorities, the GMCA and TfGM met with a number of authorities including PDNPA to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was work done to assess the transport impact of new

Picture 18.68

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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. PDNPA submitted a representation to the PFE plan seeking a number of references to the National Park within the PFE to give it more prominence and welcoming changes to the Chew Brook Vale policy in response to their comments. They wish to continue working with Oldham Borough Council particularly on the development and implementation of a Visitor Management Plan for the site. They also made a number of comments on transport accessibility and approach to affordable housing

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.69

Peak District National Park Authority

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
5	Chew Brook Vale
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Peak District National Park Authority
Name	Adele Metcalfe
Position	Policy and Communities Manager
Signature	
Date	13 th December 2021

Picture 18.70

Places for Everyone Submission Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Rossendale Borough Council

Rossendale is a PfE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Rossendale.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Rossendale. The meeting discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

At the Vision, Strategy and Strategic Growth Options stage 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. Rossendale Borough Council confirmed they could not accept any additional housing to meet Greater Manchester's Objectively Assessed Need.

Rossendale raised a number of issues at the Vision, Strategy and Strategic Growth Options consultation stage, they expressed concern that the distribution of growth may place greater pressure on Rossendale to accommodate additional development.

During the preparation of the Draft GMSF, the GMCA sent an email asking Rossendale if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities, including Rossendale. In response to the Draft GMSF, Rossendale stated they were unable to accommodate any of GM's employment or housing need. Meetings between GMCA and Rossendale raised 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 expressed concern that this growth may have an impact on Rossendale's infrastructure. Formal comments at the Draft GMSF stage from Rossendale stated that transport improvements need to be considered strategically including the M66/A56 and seek further

Picture 18.71

consideration of improvements to public transport links into Rossendale. They referred to the proposed freight rail link via the ELR and the need to consider this as a commuter rail link. Prior to the Revised Draft stage, a meeting between Rossendale and GMCA provided a GMSF update including that the GMCA were working with Atkins to develop a Masterplan for the Northern Gateway. Also discussed was the Rossendale SHMA, high rates of out-commuting from Rossendale for employment, importance of improving the M66 and A56 and the need for an integrated approach to transport in the Northern Gateway masterplan.

At a meeting in early 2018, between Rossendale and Bury, various issues were discussed including, improving public transport connectivity for Rossendale's residents to access Greater Manchester and the possibility of using the East Lancs Rail line for commuters.

At the Revised Draft GMSF stage, a GMSF Statement of Common Ground event was held in January 2019 and Rossendale attended. The event provided an update on the GMSF and the position on evidence. Rossendale attended a meeting after the Statement of Common Ground Event with GMCA, TfGM, Rochdale and Bury. Discussion covered the Rossendale Rail Link, housing figures and Rossendale Local Plan timetable.

Comments to the Revised Draft GMSF sought improved access to Bury & Rochdale. It stated further congestion was expected on the A56/M66 due to identifying Pilsworth for further economic development and Northern Gateway growth. Rossendale are seeking a rail link between Rawtenstall and Manchester via Ramsbottom – Bury and Haywood, called Valley City Link. Rossendale are seeking to work with TfGM to help fund and facilitate a Strategic Outline Business Case for the whole Valley City Link. They also stated GM Transport Plan should recognise cycle routes in GM connecting into Rossendale.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Rossendale responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA, TfGM and neighbouring authorities including Rossendale 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. A summary of the meeting with Rossendale can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PFE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Rossendale was able to accommodate any of the PFE growth in housing and employment. The response confirmed the previous position that this was not possible.

Picture 18.72

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. Rossendale Borough Council submitted no comments during the formal PFE Publication consultation and did not contact the GMCA to further discuss Duty to Co-operate matters.

The PFE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.73

Rossendale Borough Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Signature

Organisation	Rossendale Borough Council
Name	Michael Atherton
Position	Head of Planning
Signature	<i>Mike Atherton</i>
Date	21.01.2022

Picture 18.74

Individual Duty to Co-operate Log

Public Body : Salford Clinical Commissioning Group

Salford Clinical Commissioning Group is a PFE duty to co-operate body and has consistently been engaged with the preparation of the Plan. Detailed duty to co-operate activities are set out in the PFE Statement of Common Ground and the Duty to Co-operate Statement and Log of Collaboration. The activities up to the Revised Stage are covered in detail in these documents. This summarises the position from the Revised Draft onwards.

At the Draft GMSF stage Salford Clinical Commissioning Group raised concerns about air quality and have requested that the plan is more specific on this issue. 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.

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 sought to recognize some of the concerns expressed by the Salford Clinical Commissioning Group.

The PFE Statement of Common Ground includes reference to Infrastructure Implementation and refers to JP-D1 promoting collaboration and synchronisation of investment plans between the nine PFE districts and the main infrastructure providers such as the Clinical Commissioning Groups and wider NHS.

Detailed collaborative activities are set out in the PFE Statement of Common Ground and PFE Duty to Co-operate Statement with the Log of Collaboration for you to consider further. If there are any matters which have been missed or are incorrect please do not hesitate to contact the GMCA seeking clarification.

Please could a representative of Salford Clinical Commissioning Body sign the PFE Statement of Common Ground or let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible. If you would like a meeting to discuss any of the above further, please do not hesitate to contact me on xx.

Picture 18.75

1 Co-operation Statement

I agree to sign the Statement of Common Ground accompanying the Places for Everyone

Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

My organisation has no unresolved matters which prevent me from signing.	X
My organisation is unable to currently sign the Statement of Common Ground for the reasons set out in the accompanying statement.	
Organisation	Salford Clinical Commissioning Group
Name	Hannah <u>Dobrowolska</u>
Position	Director of Corporate Services
Signature	
Date	21 September 2021

Table 1.1 Co-operation Statement

Picture 18.76

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : St. Helens Council

St. Helens is a PFE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and St. Helens.

The Formative stages of the plan involved collaboration with neighbouring authorities 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.

At the Vision, Strategy and Strategic Growth Options stage, 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. GMCA and St. Helens agreed that infrastructure issues relevant to both areas are limited to transport. GMCA, St. Helens and Merseyside authorities are to facilitate a meeting between transport colleagues to identify the implications of land reviews for planned transport investments.

During the preparation of the Draft GMSF, the GMCA sent an email asking St. Helens if they were able to accommodate any of GMCA's employment and housing need. The GMCA also shared the Green Belt Assessment methodology with neighbouring authorities, including St. Helens.

During the period between the end of the consultation on the Draft GMSF and the Revised Draft GMSF, 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 examined 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.

At the Revised Draft GMSF stage, a GMSF Statement of Common Ground event was held in January 2019 and St Helen's attended. The event provided an update on the GMSF and the position on evidence. At the Revised Draft GMSF stage St Helen's made no formal comments to the Plan.

Picture 18.77

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. St. Helens responded indicating they were unable to accommodate any growth.

In September 2020, GM authorities, GMCA and TfGM met with a number of neighbouring authorities including St. Helens to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if St. Helens was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. St Helen's submitted comments to the PfE Publication consultation and a subsequent meeting was held in November 2021 to discuss the evidence supporting Policy JPA Allocation 36 Pocket Nook in Wigan and M6 J23. Following the meeting, Wigan sent an email to St. Helens on 15th November 2021 providing an update on the evidence supporting the allocation of Pocket Nook, particularly transport. All parties agreed to continued joint working with a focus on M6/J23.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.78

St. Helens Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport

Organisation	
Name	
Position	
Signature	
Date	

Picture 18.79

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Stockport Metropolitan Borough Council

Stockport is a PfE neighbouring authority and, as such, is a duty to co-operate body. It was previously part of the GMSF joint planning process, until December 2020 when they decided to leave the process. This has 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 underpins the PfE and is set out in more detail in the PfE Statement of Common Ground and the Duty to Co-operate Log of Collaboration. They are preparing their own plan and their own approach to meeting their housing and employment needs.

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.

Meetings 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.

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 Preferred Options Summer/Autumn 2022, Publication Summer/Autumn 2023, Submission Winter 2023/4 and Adoption 2024. The PfE timetable is Publication commencing 20th July, Submission February 2022 and Adoption 2023.

The PfE 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.

Since Stockport's Departure in December 2020, the following activities have taken place:

- Meeting between PfE representative and Stockport MBC 11th 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 3rd 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;

Picture 18.80

- Response from PfE 19th 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 26th 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 and 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 14th 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 2021 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 in the PfE Statement of Common Ground;
- At the start of the PfE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters;
- A meeting during the PfE Publication consultation discussing Stockport Local Plan timetable, expected in the next few months and PfE Statement of Common Ground and timings to seeking signatures;
- Stockport MBC submitted no comments during the formal PfE Publication consultation.
- A meeting on 15th December discussing the PfE Timetable, Stockport Local Plan Timetable, outstanding duty to co-operate matters between the PfE districts and Stockport plus development proposal with potential cross boundary impacts between Tameside and Stockport.
- Proforma shared with Stockport MBC of the above meeting highlighting the outstanding duty to co-operate matters and attaching a schedule of GMSF evidence Stockport indicated they intend to use to support the preparation of their local plan.
- Email exchanges between the PfE districts and Stockport between 8th February and 11th February 2022, agreeing revisions to relevant sections of the PfE Submission Statement of Common Ground to better reflect the position between Stockport and the PfE districts, provision of an updated position added to the meeting note of 15th December 2021 and confirmation Stockport are unable to accommodate any of PfE's unmet need .

Picture 18.81

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.82

Stockport Metropolitan Borough Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
12	Cross Boundary Transport
13	Manchester Airport

Organisation	Stockport Metropolitan Borough Council
Name	David Meller
Position	Cabinet Member for Economy & Regeneration
Signature	
Date	14 February 2022

Picture 18.83

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Warrington Council

Warrington is a PFE neighbouring authority and, as such, is a duty to co-operate body. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PFE districts and Warrington.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with Warrington and discussed development plan updates, SHMA and housing market areas and cross boundary transport issues.

At the Objectively Assessed Development Needs consultation in late 2014, comments were received from Warrington related to logistics in the wider Atlantic Gateway.

During the Vision, Strategy and Growth Options Stage, the GMCA met with Warrington and provided an update on the GMSF, plus provided evidence of commuting patterns between Cheshire East, Warrington and GM. In response to the formal consultation, Warrington indicated they did not have any fundamental concerns or comments to make.

During the preparation of the Draft GMSF stage, the GMCA sent an email asking Warrington if they were able to accommodate any of GMCA's employment and housing need. They also shared the Green Belt Assessment methodology with neighbouring authorities including Warrington. In response to the Draft GMSF, Warrington sought an opportunity to discuss the proposed Western Cadishead and Irlam site. Detailed comments are set out in the Duty to Co-operate Statement and Log of Collaboration.

During the period between the end of the consultation on the Draft GMSF and the Revised Draft GMSF, a meeting took place between Warrington, GMCA, Salford, Wigan, Trafford and TfGM. It discussed the M6/M56 Junction and cumulative impact on the SRN, the proposed Western Cadishead and Irlam site.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and Warrington attended. The event provided an update on the GMSF and the position on evidence. Following the main event there was a meeting between GMCA,

Picture 18.84

Warrington, GMEU, Salford, Lancashire Wildlife Trust, Natural England, TfGM, Wigan, Trafford. The meeting discussed the Warrington Local Plan; transport issues; housing issues, including Warrington stating it is meeting its own need and unable to take any of GM's requirement; economic growth; environmental issues including the cross boundary Nature Improvement Area; strategic development sites; Green Belt issues; and sign off for the Statement of Common Ground. Warrington made no formal comment at the Revised Draft GMSF stage.

Between the Revised Draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. Warrington responded indicating they were unable to accommodate any growth.

In September 2020, a series of duty to co-operate meetings took place between the Greater Manchester authorities, the GMCA, TfGM and neighbouring authorities including Warrington 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. A summary of the meeting with Warrington can be found in the Duty to Co-operate Statement and Log of Collaboration.

Warrington contacted the GMCA seeking an update on the PfE Publication Plan to inform a refresh of their 2019 Economic Development Needs Assessment (ENDA). GMCA responded to Warrington's request stating the "Places for Everyone" Joint Development Plan will have substantially the same effect, on the remaining districts, as the GMSF 2020 would have done.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if Warrington was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

At the start of the PfE Publication consultation in August 2021, an email was sent summarising the collaborative activity to date, along with cross boundary highway link flows and offering to resolve any further outstanding Duty to Co-operate matters. Warrington requested a meeting to discuss their Local Plan and also receive an update on the PfE plan. This took place in September 2021 and was attended by Warrington, the GMCA, TfGM, Salford, Trafford and Wigan. Matters discussed included: the PfE Reg 19 consultation, update and timetable; the Warrington Local Plan Reg 19 consultation commencing early October 2021 and an update on key changes to the plan since the previous version. Warrington submitted no comments during the formal PfE Publication consultation.

A meeting was held on 17th December 2021 between Warrington and the GMCA to discuss the PfE Statement of Common Ground. Warrington Borough Council confirmed that given there are no major concerns regarding the location and nature of allocations in the

Picture 18.85

Manchester Plan, and given the overview of transport evidence base given to Warrington Borough Council by TfGM, they does not consider it necessary to carry out a detailed review of TfGM's transport evidence ahead of the submission of the Plan.

The PfE Statement of Common Ground is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.86

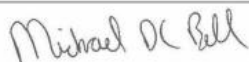
Warrington Council

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
1	Flood Risk & the Water Environment
2	Minerals and Waste
3	Employment Distribution
4	Housing Distribution
6	Green Infrastructure
7	The Green Belt
9	Great Manchester Wetlands Nature Improvement Area
12	Cross Boundary Transport

Organisation	Warrington Borough Council
Name	Michael Bell
Position	Planning Policy & Programmes Manager
Signature	
Date	21/1/22

Picture 18.87

Individual Duty to Co-operate Log

Neighbouring Authority : West Lancashire

West Lancashire is a PfE neighbouring authority and, as such, is a duty to co-operate body to the PFE. It has consistently been engaged with the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the GMCA and West Lancashire.

The Formative stages of the plan involved collaboration with neighbouring authorities 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 meeting with West Lancashire and discussed development plan updates, SHMA and housing market areas, cross boundary transport issues.

During the Vision, Strategy and Growth Options Stage the GMCA met with West Lancashire and provided an update on the GMSF, plus provided evidence of commuting patterns between West Lancashire and GM. In response to the formal consultation West Lancashire stated they were broadly supportive of 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 West Lancashire Borough Council key growth area and is close to the boundary with Wigan. One key project the Council is working on is the rail link into Skelmersdale off the Wigan-Kirkby line.

During the preparation of the Draft GMSF stage, the GMCA shared the Green Belt Assessment methodology with neighbouring authorities including West Lancashire. The GMCA also sent an email asking West Lancashire if they were able to accommodate any of GMCA's employment and housing need. They indicated they were awaiting further evidence including the Greater Manchester Green Belt Review before deciding whether they can accommodate any of Greater Manchester's housing requirement. At a meeting between West Lancashire and the GMCA they indicated their support for the proposals at J25/26 of the M6 and agreed to discuss joint work with St. Helen's.

In their formal comments to the Draft GMSF West Lancashire indicated their support for proposed allocations within the M6 Corridor at Junction 25 and 26. In the Accessibility policy they sought reference to connections to/from surrounding areas outside Greater Manchester and other references to transport improvements. They also sought reference to cross boundary green infrastructure connections.

At the Revised Draft GMSF stage, West Lancashire raised concerns about the housing figures not matching the ambitious employment growth and this leading to more pressure on

Picture 18.88

neighbouring authorities to release more land for housing. They were also concerned that GM was not releasing enough Green Belt land to accommodate growth.

Between the revised draft GMSF stage and the GMSF Publication preparation, an email was sent to all neighbouring authorities asking if they were able to accommodate any of GM's housing or employment growth to 2037. West Lancashire responded indicating they were unable to accommodate any growth.

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. A summary of the meeting with West Lancashire can be found in the Duty to Co-operate Statement and Log of Collaboration.

Following the move to the PfE Plan, after the departure of Stockport from the joint planning process, a further email was sent in Spring 2021 asking if West Lancashire was able to accommodate any of the PfE growth in housing and employment. The response confirmed the previous position that this was not possible.

Detailed cross boundary matters are set out in the Statement of Common Ground for you to consider further. If there are any matters which have been missed or are incorrect please do not hesitate to contact the GMCA seeking clarification.

The PfE Statement of Common Ground and PfE Duty to Co-operate Statement with the Log of Collaboration is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.89

1 Co-operation Statement

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.


My organisation has no unresolved matters which prevent me from signing.	Confirmed
My organisation is unable to currently sign the Statement of Common Ground for the reasons set out in the accompanying statement.	N/A
Organisation	West Lancashire Borough Council
Name	Councillor Ian Moran
Position	Leader of West Lancashire Borough Council
Signature	
Date	03/11/2021

Table 1.1 Co-operation Statement

Picture 18.90

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : West Yorkshire Combined Authority

West Yorkshire Combined Authority is one of PFE neighbouring authorities, has been engaged with the preparation of the Plan since it was formed in 2014. Set out below is a summary of the duty to co-operate activities to date and the current position between the GMCA and West Yorkshire Combined Authority.

At the Revised Draft stage, a GMSF Statement of Common Ground event was held in January 2019 and West Yorkshire Combined Authority attended. The event provided an update on the GMSF and the position on evidence.

In the Autumn of 2020, the GMCA met with a number of authorities including West Yorkshire Combined Authority to discuss transport evidence and specific duty to co-operate comments. The focus of the meetings was 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. A summary of the meeting can be found in the Duty to Co-operate Statement and Log of Collaboration.

At the start of the PFE Publication consultation in August 2021 an email was sent summarising the collaborative activity to date and offering to resolve any further outstanding Duty to Co-operate matters. A meeting was requested between West Yorkshire Combined Authority, Kirklees, Calderdale, GMCA, TfGM, Oldham and Rochdale to discuss cross boundary matters. A presentation was given providing an overview and Timetable of the PFE, Transport Modelling, HRA and Duty to Co-operate/Statement of Common Ground. Discussion covered the M62 and what data had been shared with National Highways (Highways England).

West Yorkshire Combined Authority submitted no comments during the formal PFE Publication consultation.

The PFE Statement of Common Ground and PFE Duty to Co-operate Statement with the Log of Collaboration is attached for your consideration. Please let me know if you have any issues with signing the Statement of Common Ground and we will seek to resolve these where possible.

Picture 18.91

West Yorkshire Combined Authority

I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my authority is signing are set out below:

Statement No.	Statement Title
12	Cross Boundary Transport

Signature

Organisation	West Yorkshire Combined Authority
Name	Councillor Denise Jeffery
Position	Chair of the West Yorkshire Combined Authority Place, Regeneration and Housing Committee
Signature	
Date	25/11/2021

Picture 18.92