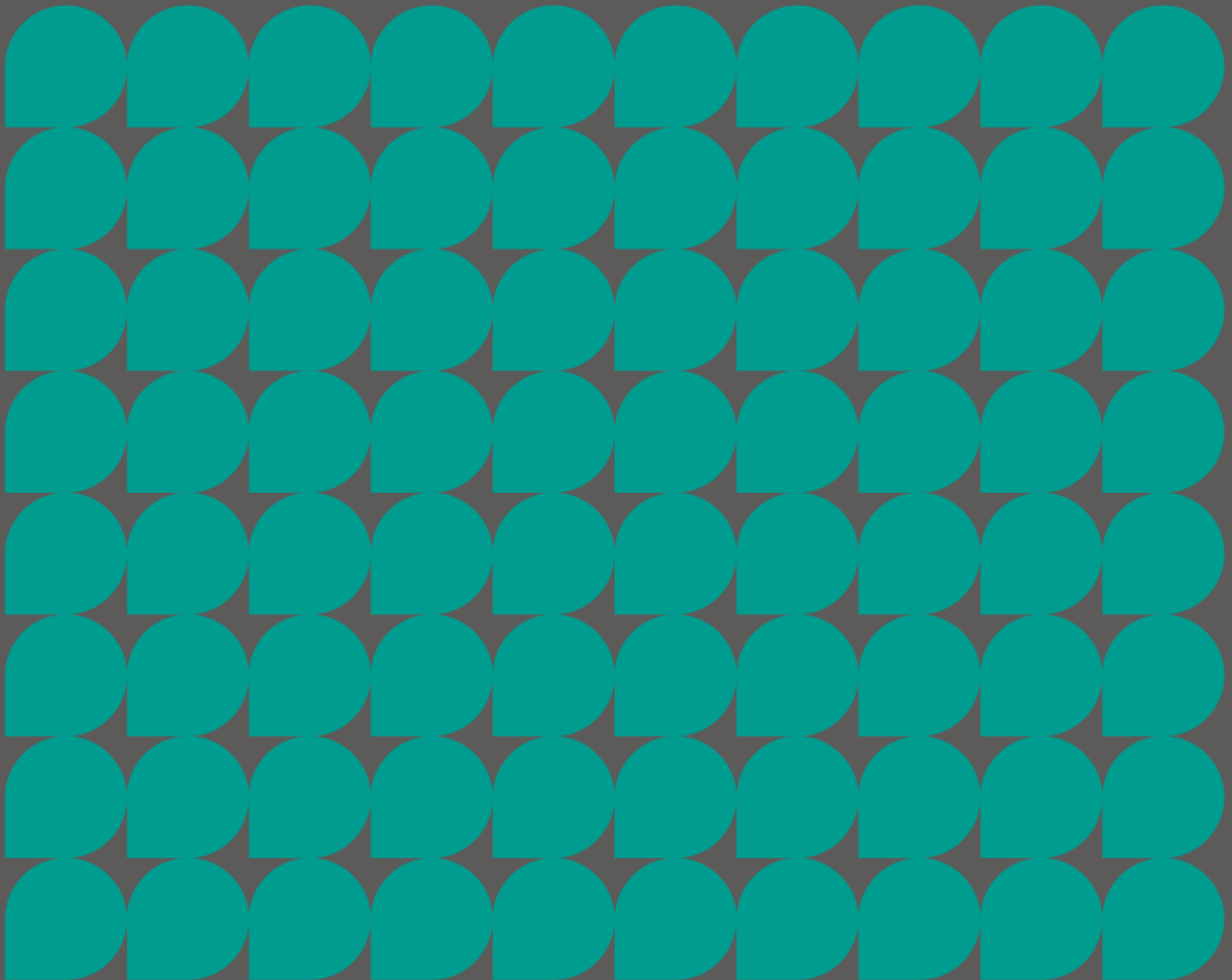


Places for Everyone

Submission Statement of Common Ground

February 2022



Places for Everyone – Submission Statement of Common Ground

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1 Statement of Common Ground

- 1.1 This document is a Statement of Common Ground and is required to support the preparation of the Places for Everyone (PfE). The Revised National Planning Policy Framework (NPPF) introduced the requirement to record effective and ongoing collaborative activities in a statement of common ground. This should be prepared by the strategic-plan making authorities which includes local authorities, Mayors and combined authorities. For a plan to be sound it must be effective, which means deliverable and "based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground" ⁽¹⁾.
- 1.2 In 2014 the Association of Greater Manchester Authorities (AGMA) made a decision to prepare a joint plan covering all of the ten Greater Manchester authorities Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan. In December 2020 Stockport MBC withdrew from the joint plan making process and the remaining nine authorities continued to prepare a joint plan, which became the PfE.
- 1.3 The PfE has a requirement under the Planning and Compulsory Purchase Act to comply with Duty to Co-operate requirements set out in S33A. This sets out who the duty applies to and what the duty entails "to engage constructively, actively and on an ongoing basis" in the process of preparing a development plan document. The Duty to Co-operate Statement and Log of Collaboration records all duty to co-operate activities since 2013 and should be read alongside this document.
- 1.4 The PfE will identify the level and type of growth to be planned and ensure there is an appropriate supply of land to meet this need. There is a requirement to co-operate effectively on strategic priorities that cross boundaries and affect more than one local authority. It is updated at each iteration of the PfE, reflecting the current position on strategic and cross boundary matters of interest to duty to co-operate bodies.
- 1.5 The strategic priorities for the PfE are:
- set out how Greater Manchester (excluding Stockport) should develop up to 2037;
 - identify the amount of new development that will come forward across the PfE Plan, in terms of housing, offices and industry and warehousing, and the main areas in which this will be focused;
 - protect the important environmental assets across the PfE;
 - allocate sites for employment and housing outside the urban area;
 - support the delivery of key infrastructure, such as transport and utilities;

1 Para 35 NPPF.

- define a new Green Belt boundary for the PfE;
- provide a context for more detailed local plan work.

2 Who needs to co-operate?

Strategic Policy Making Authorities

2.1 The PfE is a Joint Development Plan Document and as such the nine authorities are the "strategic policy making authorities" and agree planning policy through a Joint Committee of the Nine. The main signatories are the nine members of the Joint Committee and the decision to approve and consult on the Publication PfE and submit the Submission PfE to the Secretary of State for consideration is effectively gaining a signature (see Appendix 1 for dates). Any collaborative agreement set out in this document relates to these nine authorities and other relevant duty to co-operate bodies. The PfE shows the distribution of housing, offices and industrial and warehousing across the nine districts which has been agreed through the Joint Committee. Membership of the Joint Committee is made up of:

- Bolton Council
- Bury Council
- Manchester City Council
- Oldham Council
- Rochdale Borough Council
- Salford City Council
- Tameside Metropolitan Borough Council
- Trafford Council
- Wigan Council

Duty to Co-operate Bodies - Additional Signatories

2.2 "Additional signatories" are made up of neighbouring authorities and public bodies. Signatures will be sought from the Publication stage onwards, to allow the fullest collaboration to take place between the key parties. Alongside the PfE a copy of the PfE Statement of Common Ground will be provided and signatures sought. The Joint Committee members 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. 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.

- 2.3** Up until its decision in December 2020, Stockport MBC was an integral member of the AGMA Executive Committee, responsible for producing the draft GMSF. As such, it contributed to the establishment of a joint evidence base. This Statement of Common Ground seeks to reflect the reset relationship as an additional signatory but also the close relationship Stockport MBC retains with the Joint Committee districts, particularly relating to planning and cross border matters within GM and beyond. Stockport MBC is still a member of the Greater Manchester Combined Authority, Transport for Greater Manchester, GM Local Enterprise Partnership and GM Local Nature Partnership.
- 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.
- 2.5** National Planning Policy Guidance provides information on how to determine the geographical area that a Statement of Common Ground should cover. It states this will depend on the strategic matters planned for and the most appropriate functional geography to gather evidence and develop policies, such as travel to work areas and housing market areas. The strategic priorities covered by the PfE are set out in paragraph 1.26 of the PfE Plan and paragraph 1.5 of this document and relate to sustainable growth for housing and employment, environmental assets and delivery of key infrastructure within the PfE districts to 2037. More information on how the geographical area was identified is set out in the section called Geographical Area, below. This shows that Greater Manchester is the most appropriate travel to work area and housing market area and has been used by the GM LEP, GM Natural Capital Group, TfGM and Greater Manchester Combined Authority as the most appropriate level to develop policies/ strategies and undertake delivery. This has informed the identification of cross boundary duty to co-operate bodies.
- 2.6** The additional signatories 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

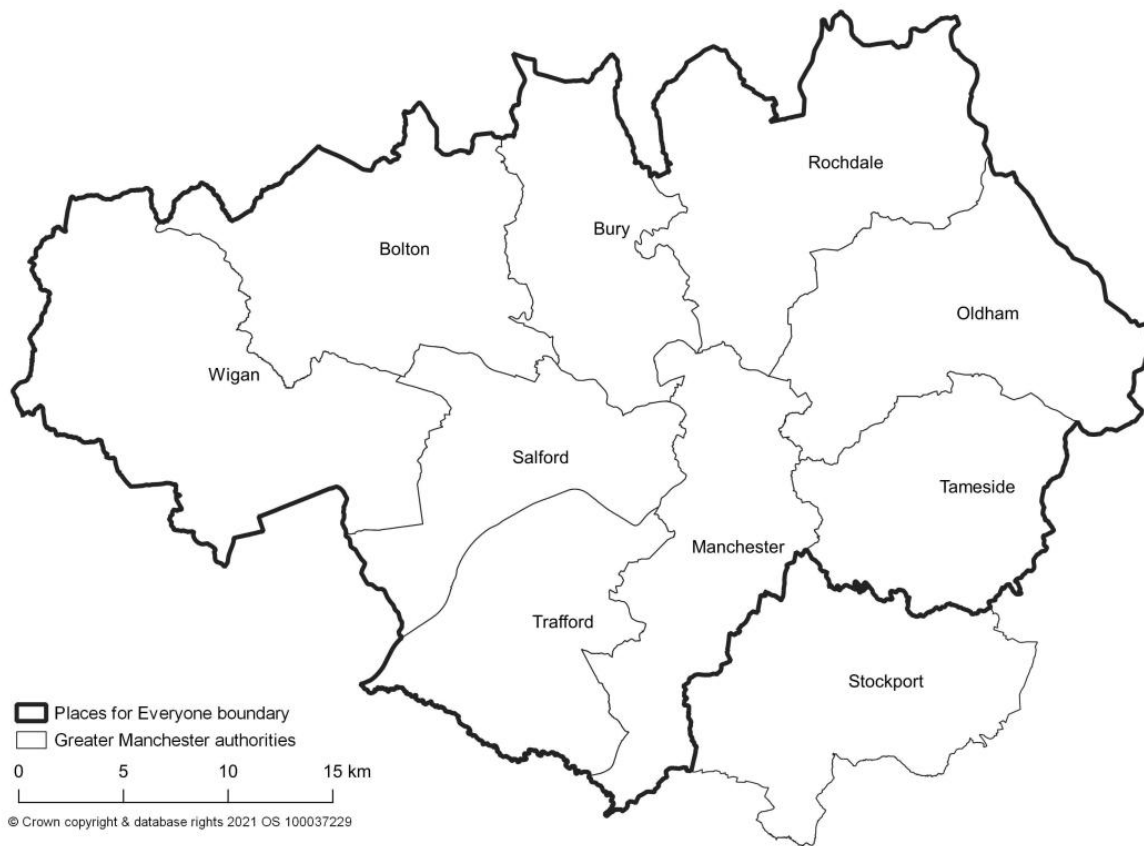
- Rossendale Borough Council
- St. Helens Council
- Stockport Metropolitan Borough Council
- Warrington Council
- West Lancashire Borough Council
- West Yorkshire Combined Authority

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
- National Highways
- Local Enterprise Partnership
- Local Nature Partnership

3 Geographical Area

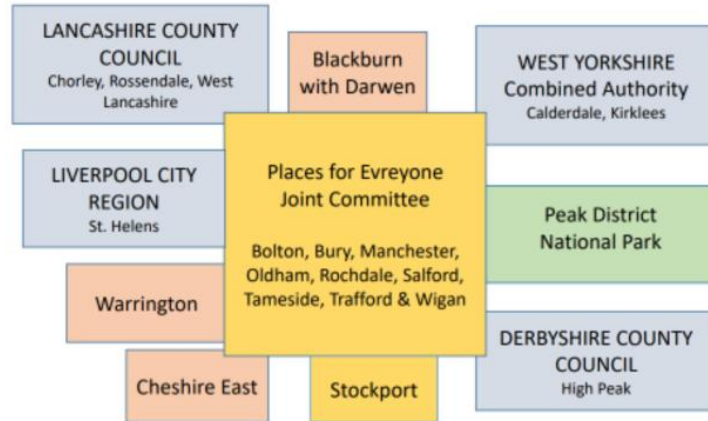
- 3.1** The area covered by the PfE is shown in the diagram below. The early stages of evidence gathering established Greater Manchester as the correct boundary to consider housing and travel to work areas. Detailed work on what should be the Functional Economic Area and housing market area was undertaken 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. Detail of how the housing market area has been identified are set out in the Housing Market Assessment (SHMA). In terms of Greater Manchester being the functional economic area, this is also recognised in the establishment of the GM Local Enterprise Partnership covering the same area. The strategic priorities covered by the PfE are set out in paragraph 1.26 of the PfE Plan and 1.5 of this Statement of Common Ground. They relate to how the PfE plan area should develop to 2037, particularly in terms of housing and employment but also the identification of environmental assets, infrastructure delivery and a new Green Belt boundary. These matters have determined the identification of cross boundary duty to co-operate bodies.



Picture 3.1

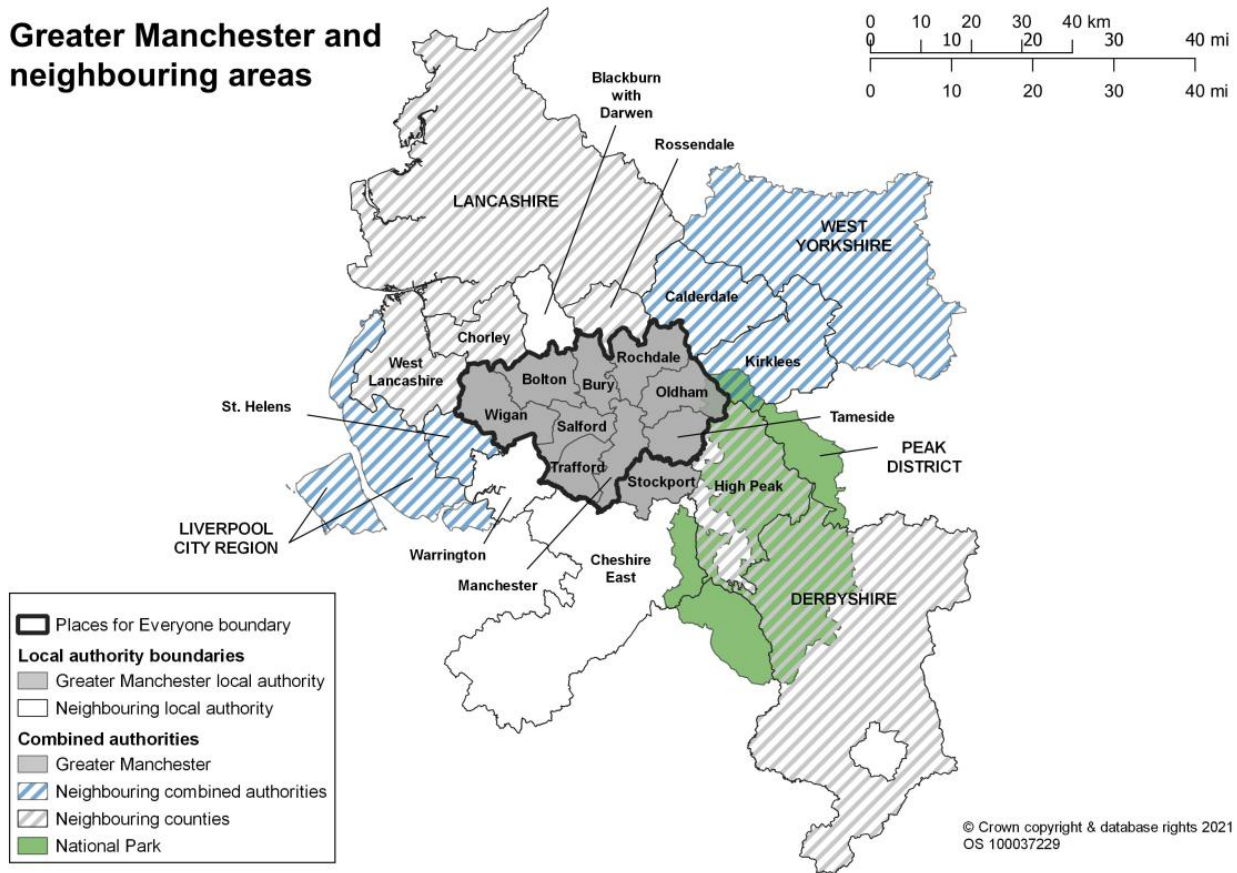
- 3.2** Effective co-operation on cross boundary strategic issues covers those areas outside of Greater Manchester but sharing a border, plus Stockport MBC. Co-operation takes place with the relevant level of local government depending on the issue, this includes city-region, county and local authorities.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

Places for Everyone and Neighbouring Authorities



Picture 3.2 PfE and Neighbouring Authorities

Greater Manchester and neighbouring areas



Picture 3.3

4 Places for Everyone Governance

- 4.1 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”) and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.
- 4.2 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.
- 4.3 On the 30 October 2020, the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.
- 4.4 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.

- 4.5** 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.
- 4.6** Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained.
- 4.7** Consequently, at its meeting on the 11th December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.
- 4.8** Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has ‘substantially the same effect’ on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.
- 4.9** In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan proceeded directly to Publication stage under Regulation 19 and then Submission stage under Regulation 22 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 4.10** The PfE Publication and Submission Plan was considered at the Joint Committee of the Nine on 20th July 2021 and subsequent approvals followed in the each district (see Appendix 1).

GMCA Governance

- 4.11** Much of the evidence and studies supporting the PfE has been overseen by Committees/boards within the Greater Manchester Combined Authority governance structure, which has membership made up from local authorities, public bodies and infrastructure providers. This enables effective continued cooperation throughout the preparation of the PfE in terms of both evidence preparation and policy development. The previous iterations of the Plan up to March 2021 were considered and approved through the governance structure set out below. A description of the key committees, boards and commissions which feed into the plan preparation process and agree the document are set out in Appendix 2.



Picture 4.1

Joint Committee of the Nine

- 4.12** The governance structure since March 2021 is a Joint Committee of the Nine whose membership is Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, the districts continuing preparation of a joint plan. Once approved by the Joint Committee of the Nine, approval follows through the districts own governance arrangements for Publication and Submission stages. The GMCA Governance structure will still be used when relevant for the PfE, with all decisions on the document made through the Joint Committee, the structure is shown below.



Picture 4.2

5 Public Bodies and how they are connected into Place for Everyone Process and GMCA Governance Structure

Signatories & Additional Signatories	Governance
Joint Committee Members (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan)	<ul style="list-style-type: none"> Joint GMCA/AGMA Executive Board up to December 2020 Joint Committee of the Nine from March 2021
Transport for Greater Manchester	<ul style="list-style-type: none"> Greater Manchester Transport Committee Green City Region Board
Highways Authorities <ul style="list-style-type: none"> Joint Committee Members 	<ul style="list-style-type: none"> Joint GMCA/ AGMA Executive Board to December 2020 Joint Committee of the Nine from March 2021 Greater Manchester Transport Committee Bus Network Sub-Committee Rail & Metrolink Sub-Committee
Natural England	<ul style="list-style-type: none"> Natural Capital Group
Homes England	<ul style="list-style-type: none"> Planning and Housing Commission One Public Sector Estate
Clinical Commissioning Group's	<ul style="list-style-type: none"> Greater Manchester Health and Well Being Board

Signatories & Additional Signatories	Governance
Local Enterprise Partnership	<ul style="list-style-type: none"> • GMCA • GM Local Enterprise Partnership • Green City Region Board
Local Nature Partnership	<ul style="list-style-type: none"> • Green City Region Board

Table 5.1 Duty to Co-operate Bodies and the GMCA Governance Structure

6 Co-operation Between the Nine Places for Everyone Districts and Stockport

- 6.1** Following Stockport's departure from the joint plan making process there has been a reset to the Duty to Co-operate relationship between the nine PfE districts and Stockport. To assist this, Greater Manchester Mayor Andy Burnham, City Mayor of Salford and GMCA Portfolio Lead for PfE met with Cllr Elise Wilson, Leader of Stockport Council on 14th July to discuss the Duty to Co-operate arrangements, the PfE timetable, Stockport Local Plan timetable and demonstrate continued commitment to collaboration between the PfE districts and Stockport.
- 6.2** A follow up letter dated 26th July 2021 set out the Duty to Co-operate position between the 10 Greater Manchester Districts and this is set out below.

Co-operation Between the 10 Greater Manchester Authorities

- 6.3** In November 2014 the 10 Greater Manchester authorities resolved to prepare a joint development plan document, known as the Greater Manchester Spatial Framework.
- 6.4** 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.
- 6.5** 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.
- 6.6** 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.

- 6.7** 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.
- 6.8** The 10 authorities worked together to:
- a. Agree the objectively assessed needs for housing and employment across the plan area
 - b. Identify the existing land supply available for development following an optimisation process
 - c. Agree that there was a shortfall in existing land supply to meet needs
 - d. Engage constructively with neighbouring authorities outside of GM to explore the opportunity for some of our need to be met elsewhere
 - e. Commission an extensive evidence base to underpin and inform the plan, including Transport, Landscape Character assessment, Green Belt Assessment and Green Belt Harm Assessment, SFRA, Viability, Carbon and energy, SHMA
 - f. Following this work it was agreed by the 10 that a limited release of Green Belt land was required to meet needs of the 10 authorities.

Addressing the Shortfall

- 6.9** The starting point for addressing the shortfall was the requirement to support delivery of GM's objectives. In spatial terms this translated into identification of sufficient land to support sustained, sustainable and inclusive growth to ensure that no part of GM was left behind and all residents had the opportunity to benefit in the economic success of the conurbation. The spatial strategy that was developed focused on making the best use of urban/brownfield land and existing transport infrastructure whilst identifying opportunities to spread prosperity to all parts of the city region. The spatial strategy for growth focused on the following :
- i. Strong and continued growth at the conurbation core
 - ii. Focus on regeneration of the inner areas around the conurbation core
 - iii. Boosting the economic performance of the northern districts
 - iv. Sustaining southern competitiveness
 - v. Main Town Centres
 - vi. Rapid Transit routes
- 6.10** 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

- 6.11** 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.
- 6.12** 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
- 6.13** 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.
- 6.14** 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).
- 6.15** 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.

- 6.16** 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.
- 6.17** 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

- 6.18** 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.
- 6.19** 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.
- 6.20** Stockport Council is committed to preparing its own local plan.
- 6.21** 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.
- 6.22** 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.

- 6.23** 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.
- 6.24** 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.
- 6.25** The timetable for Places for Everyone is that following the consultation on the Regulation 19 plan in August 2021, Submission is expected February 2022 and Examination and Adoption by 2023. Papers to begin the process were 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.
- 6.26** Stockport is intending to consult on a Regulation 18 (Preferred Options) in Summer/Autumn 2022, Publication Summer/Autumn 2023, Submission Winter 2023/24 and Adoption 2024.

- 6.27** 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.

7 Collaboration

- 7.1** From the early stages of preparing a joint plan, key pieces of evidence and policy development have been shared with neighbouring authorities and advisory bodies. Some evidence has been shared as far back as 2013, for example the Strategic Housing Market Methodology. The GMCA Boards and Commissions have considered much of the evidence supporting PfE Plan and some of the key studies have had direct involvement from advisory bodies.
- 7.2** The duty to co-operate bodies have commented on various stages of the Plan, including the Revised Draft 2019 GMSF and Publication PfE. A summary is provided in the PfE Duty to Co-operate Statement and Log of Collaboration.
- 7.3** Detailed collaborative work on allocations is on the whole dealt with by districts.
- 7.4** Significant effort has been given to duty to co-operate and many collaborative activities have taken place throughout the preparation of the Plan. Key activities include:
- During the Publication PfE consultation duty to co-operate bodies were sent individual emails setting out individual collaborative activity between themselves and the GMCA (on behalf of the nine districts), alongside cross boundary traffic flows, a copy of the PfE Statement of Common Ground and the PfE Duty to Co-operate Statement and Log of Collaboration. They were offered the opportunity to meet with the GMCA to discuss any outstanding duty to co-operate activities;
 - AGMA Joint Committee to December 2020 and Joint Committee of the Nine March 2021 onwards;
 - Collaboration with Stockport MBC following their departure from the joint plan making process;
 - Neighbouring authorities were invited to meet with PfE representatives to update them on PfE timescale and evidence base following Stockport's departure;
 - September 2020 meetings to discuss the joint plan timetable, the approach to transport evidence and other duty to co-operate matters, in attendance were all neighbouring authorities, all GM authorities (including Stockport), representatives of PfE and TfGM;
 - January 2019, a Statement of Common Ground event was held bringing together the GMCA, GM authorities, neighbouring authorities, advisory bodies and infrastructure providers. An update on the Revised GMSF 2019 was provided followed by meetings with individual authorities to discuss issues of concern;
 - During preparation of the Draft GMSF 2016, Revised Draft GMSF 2019, Publication GMSF (abandoned) and PfE Publication Plan 2021 neighbouring authorities were

contacted to ask if they would consider accommodating any of PfE's housing or employment growth.

- Joint working continued with Environment Agency, Natural England, Historic England and Highways England (National Highways) on various aspects of the strategic evidence base following the consultation ending on the Revised Draft GMSF 2019.
- Joint meetings were undertaken between each district within PfE 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.
- Collaboration on the M6 Junction 23 Haydock Island - Capacity Feasibility Study jointly commissioned by St. Helens, Wigan Council and Highways England, and published in 2019.
- A round of presentations at the start of the joint plan making process looking at commuting patterns between PfE districts and neighbouring authorities.

7.5 At each stage collaboration has taken place and this is summarised in the Duty to Co-operate Statement and Log of Collaboration appendices. It covers:

- Formative Proposals for a Greater Manchester Spatial Framework (March 2013 to November 2014)
- Vision, Objectives and Strategic Growth Options for the Greater Manchester Spatial Framework (December 2014 to January 2016)
- First draft of the Greater Manchester Spatial Framework (February 2016 to January 2017)
- Greater Manchester's Plan for Homes, Jobs and the Environment Revised Draft of the Greater Manchester Spatial Framework (February 2017 to March 2019)
- Greater Manchester's Plan for Homes, Jobs and the Environment Publication Draft of the Greater Manchester Spatial Framework (April 2019 to December 2020)
- Places for Everyone Publication Plan (January 2021 to July 2021)
- Places for Everyone Submission Plan (August 2021 to February 2022)

7.6 As the Places for Everyone Plan progresses, a further iteration of the Statement of Common Ground will be prepared, documenting continued collaborative working.

8 Strategy

Greater Manchester Strategy

8.1 The PfE is the spatial representation of the Greater Manchester Strategy, as it relates to the nine districts of the Joint Committee and supports its delivery.

- 8.2** The Greater Manchester Strategy outlines plans for the future of the city region in the areas of health, wellbeing, work and jobs, housing, transport, skills, training and economic growth. It is a strategy for everyone in Greater Manchester - residents, the voluntary, community and social enterprise sector, businesses and civic leaders.
- 8.3** A key aspect of delivery in the Greater Manchester Strategy is continued co-operation and partnership working across organisations. The Greater Manchester Strategy acknowledges the strengths of the city region but also the challenges related to realising the full potential of Greater Manchester's residents. The vision in the Greater Manchester Strategy is also the vision in PfE, ensuring both documents share the same priorities.
- 8.4** The strategy for achieving this vision is structured around 10 priorities, reflecting the life journey:
1. Children starting school ready to learn;
 2. Young people equipped for life;
 3. Good jobs, with opportunities for people to progress and develop;
 4. A thriving and productive economy in all parts of Greater Manchester;
 5. World-class connectivity that keeps Greater Manchester moving;
 6. Safe, decent and affordable housing;
 7. A green city-region and a high quality culture and leisure offer for all;
 8. Safer and stronger communities;
 9. Healthy lives, with quality care available for those that need it;
 10. An age-friendly city-region.
- 8.5** The Places for Everyone Plan will contribute to delivering these priorities and will have a greater role in some than in others, but is mindful of them all.

Duty to Co-operate Comments

- 8.6** At an early stage of the PfE plan the Environment Agency suggested the GMS Vision should be the Vision for PfE. 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. Other Duty to Co-operate bodies such as Historic England have considered there should be scope for amending the vision.

Greater Manchester Strategic Housing Market Assessment

- 8.7** The strategic housing market assessment (SHMA) has been prepared by the GMCA on behalf of the ten GM authorities. It seeks to present a clear, evidenced picture of the Greater Manchester housing market and how it is changing, to provide an assessment of future needs for both market and affordable housing and to explore the housing needs of different groups within the population over the plan period.

- 8.8** Greater Manchester is a large and diverse city region which, while well connected to our neighbours, can reasonably be defined as a housing market for planning purposes. More than four out of five households who move into a home in Greater Manchester already live here. Nearly nine in ten working people who live in Greater Manchester also work here and of Greater Manchester residents who work here, two fifths travel to another district for work, showing how interconnected we are as a city region.

Greater Manchester Industrial Strategy

- 8.9** Greater Manchester's Local Industrial Strategy is designed to deliver an economy fit for the future, with prosperous communities across the city-region and radically increased productivity and earning power. The Local Industrial Strategy represents a strong partnership between local leaders and government, setting out an ambitious plan to achieve the aspirations of the National Industrial Strategy and to continue to contribute to Greater Manchester's prosperity.
- 8.10** A key aspect of the GM Industrial Strategy is the delivery of infrastructure and the identification of growth opportunities. New strategic sites for manufacturing activity have been identified in the Plan, which will provide a step-change in the market offer for industrial sites and provide space for the large-scale production and manufacturing of advanced materials.

Places for Everyone Plan

- 8.11** The strategies above have informed the spatial strategy in the PfE Plan. It focuses significant growth in the core, boosts competitiveness in the north and sustains growth in the south. The overall housing, office and industry and warehousing provision planned for in the PfE Plan is set out below.

	Requirement 2021-37	Land Supply 2021-37
Housing	164,880 (10,305pa)	190,776 units
Offices	1,900,000 sqm	3,150,763 sqm
Industry & Warehousing	3,330,000sqm	3,960,389 sqm

Table 8.1 PfE Housing, Office and Industry & Warehousing provision

9 Sustainable & Resilient Places

Flooding

- 9.1 Greater Manchester Combined Authority (GMCA) commissioned JBA Consulting (JBA) in June 2017 to undertake a Level 1 Strategic Flood Risk Assessment (SFRA) and develop a Strategic Flood Risk Management Framework (SFRMF) to cover the ten Greater Manchester local authorities making up GMCA. National policy requires this Level 1 and Level 2 SFRA and SFRMF to inform the PfE and local plans for the local planning authorities.
- 9.2 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).
- 9.3 The Framework is high level and focused on the management of those flood risk issues that are of importance to the Manchester City Region, as a whole, and that have the potential to contribute to or affect its economic, social and environmental sustainability. Subsequently it highlights flood risk issues that cross local authority and City Region boundaries. As a result, there may be local FRM issues that, whilst important to local economies and communities, are not highlighted as they are better addressed at the local authority level via the LPA or lead local flood authority (LLFA). GMCA's constituent LAs are all unitary authorities and therefore hold both LPA and LLFA functions.
- 9.4 The Strategic Flood Risk Assessment (SFRA) Level 1, identifies the existing and future strategic flood risk: rivers, surface water, sewer, Groundwater and Environment Agency Source Protection Zones, canals and reservoirs. It also identified future risk including from Climate Change and examined the proposed development sites and flood risk. It states there are potentially multiple cumulative, cross-boundary impacts within Greater Manchester and with adjacent local planning authorities outside of the City Region and these are set out in the report.
- 9.5 Following the Level 1 SFRA a Level 2 SFRA has been prepared looking at future assessments of need to show that exception tests can be applied appropriately and to justify the quantum of development. The Level 1 SFRA identified gaps in understanding of future climate change impacts and this extra work was also picked up for the sites assessed in the SFRA Level 2 work.
- 9.6 The Level 2 SFRA was undertaken by JBA consulting and 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.

- 9.7** As required by the National Planning Policy Framework, the Strategic Flood Risk Assessment Reports (Level 1 and 2) have provided the baseline evidence with regards to all sources of flood risk and application of the Sequential and Exception Test. The Environment Agency (EA) have been involved throughout the preparation of this work alongside GM districts and the GMCA. To help complete the GM Level 1 and Level 2 Strategic Flood Risk Assessments, the GMCA engaged the Environment Agency for advice on a regular basis between 2018 and 2021. As such, the Environment Agency were members of the Steering Group for the GM level 1 and Level 2 Strategic Flood Risk Assessments and weekly 'keep in touch' meetings were held. The EA also provided technical flood risk advice for the GM Level 2 Strategic Flood Risk Assessment on some proposed allocations over 2019 and 2020 including Chew Brook Vale in Oldham, East of Boothstown in Salford and Elton Reservoir in Bury. The GMCA and EA continue to have regular catch-up meetings to discuss water related planning matters.
- 9.8** The PfE JP-S 5 Flood Risk and the Water Environment has been amended to reflect the latest evidence from the Level 2 SFRA, plus relevant allocations in the plan reference flood risk mitigation in more detail. The location of new development in the Plan area has been informed by the application of Sequential Test and Exception Test, as required by national planning policy. The aim of the tests are to steer new development towards areas with the lowest risk of flooding first before considering higher risk locations.
- 9.9** The North West River Basin Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment across Greater Manchester and beyond. It sets out legally binding objectives for the quality of water bodies, with the default being that they should be classified as 'good' overall based on their ecological status or potential and their chemical status.

Duty to Co-operate Bodies

- 9.10** In response the Revised Draft Plan in 2019 the Environment Agency raised concerns about the need for flood risk evidence to support the PfE plan. They supported the preparation of the Level 1 SFRA that identified the strategic allocations and sites within the existing land supply requiring the application of the Exception Test. They stated the Level 2 SFRA was required to show that exception tests can be applied appropriately and to justify the quantum of development. They also stated Level 1 SRFA identified gaps in understanding of future climate change impacts and this additional work should form part of the Level 2 SFRA work. This work was undertaken and a Level 2 SFRA completed along with additional work to address the gap in understanding around climate change impacts. The PfE districts consider that the evidence supporting PfE now meets these concerns.

Duty to Co-operate Comments PfE Publication Consultation

- 9.11** During the PfE Publication consultation EA 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.

PfE Statement of Common Ground 1

Flood Risk and the Water Environment

The PfE policies and proposals especially Policy JP-S5 Flood Risk and the Water Environment, A Green Places and relevant allocations have been informed by the SFRA Level 1 and 2 and provide a sound basis to deal with any river catchment issues which may affect flooding potential in the future within the PfE area and any cross boundary issues.

The PfE and supporting evidence provide the basis for the PfE districts to collaborate with relevant neighbouring lead local flood authorities, risk management authorities and public bodies including the Environment Agency, United Utilities and relevant cross boundary neighbouring councils on any river catchment issues which may affect flooding potential in the future.

Relevant neighbouring lead local flood authorities and risk management authorities include 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, Rossendale Borough Council, St. Helens Council, Stockport Metropolitan Borough Council, Warrington Council and West Lancashire Borough Council.

The PfE districts are committed to ongoing collaboration with relevant authorities and organisations, set out in this Statement.

The preparation of flood and water management policies in the PfE meets the duty to co-operate requirements.

Minerals and Waste

- 9.12** The Greater Manchester Joint Minerals Plan was adopted in April 2013. Annual monitoring of minerals extraction and changes to future needs will inform whether and when an update of the joint minerals plan is required, especially as a result of the growth set out in this plan.

- 9.13** The Greater Manchester Joint Waste Development Plan was adopted in April 2012. Annual monitoring of waste facility capacity and changes in future needs will inform whether and when an update of the joint waste plan is required, including as a result of the growth set out in this plan.

PfE Publication Consultation Comments

- 9.14** During the consultation period Cheshire East contacted GMCA regarding minerals and waste and sought a change to the Statement of Common Ground, Duty to Co-operate Statement and Log of Collaboration. These amends have been made.
- 9.15** In comments and subsequent meetings, Cheshire West and Chester raised concerns that having no date for the minerals local plan review causes potential problems for the delivery of PfE. A request is to be made to the PfE districts to update their local development schemes to commit to a minerals local plan review.

PfE Statement of Common Ground 2

Minerals & Waste

The PfE districts will collaborate with adjoining neighbouring districts and other areas with which there are significant minerals and waste movements, on any revision to the Greater Manchester Joint Minerals Plan and any revision to the Greater Manchester Joint Waste Development Plan. Further consideration of this issue will follow the Submission stage of the PfE.

Relevant neighbouring authorities in relation to minerals and waste include Blackburn with Darwin Borough Council, Calderdale Council, Cheshire East Council, Cheshire West and Chester, Chorley Borough Council, Derbyshire County Council, High Peak Borough Council, Kirklees Council, Lancashire County Council, Liverpool City-Region, Rossendale Borough Council, St. Helens Council, Stockport MBC, Warrington Council and West Lancashire Borough Council.

10 Places for Jobs

- 10.1** Beyond the NPPF, the approach to economic policies in the Places for Everyone Plan has been informed by a variety of evidence and strategies. National strategies have informed economic objectives in the plan including Government commitments and policies around infrastructure, skills, innovation, levelling up the whole of the UK, supporting the transition to a net zero economy and developing the vision for Global Britain.

10.2 Since 2014 economic strategies covering Greater Manchester have been prepared by the Greater Manchester Combined Authority to help drive economic growth in the region, encouraging and building on business and research innovation; considering the infrastructure needs to drive business and job growth, identifying sectoral strengths and skills gaps and prioritising investment decision. In addition, evidence supporting the PfE has been prepared complementing the wider strategies and meeting the requirements of the NPPF and NPPG, local strategies, PfE objectives and in response to comments during consultation stages, including from Duty to Co-operate bodies. As evidence emerged it has been shared at the relevant plan stage, as part of the consultation material including with duty to co-operate bodies. The key studies include:

- Good Jobs and Growth - GM Local Industrial Strategy
- Greater Manchester Strategy
- Note on Covid-19, EU- Exit and the GM Economy
- GM Employment Land Need for Greater Manchester
- GM Employment Land Supply

10.3 The evidence base supporting the PfE has been reviewed following Stockport's decision to prepare their own plan, addendum's have been added where appropriate and should be read alongside the existing evidence base. Within the PfE 2021 employment distribution supports the Greater Manchester Strategy and the Spatial Strategy seeking to focus growth in the core, boost competitiveness in the north of the conurbation and sustain southern competitiveness. The PfE employment land targets have been reduced to remove Stockport's provision.

10.4 Key evidence for the PfE policies includes:

- Employment Land Need for Greater Manchester -Work has been undertaken to assess past employment land take-up (or 'completions') in order to consider the future employment land needs of the nine districts for business (offices) and industrial (i.e. manufacturing and distribution), for the 16 years up to 2037.
- Covid-19, Brexit and the Greater Manchester Economy - this examined the economic impacts of Covid-19, the new trading agreement between the UK and EU and the implications for economic growth in GM.
- GM Employment Land Supply - this assesses the supply of employment land against employment floorspace requirements. Each of the nine districts carried out their own assessment of employment land availability. The PfE ELS brings together information from each of the nine districts to identify the total employment land supply across the plan area.

Duty to Co-operate Comments From Revised GMSF 2019

- 10.5** High Peak Borough Council and West Lancashire had expressed concerns about the high levels of economic growth proposed in the PfE plan driving up demand for housing in their boroughs. The PfE districts now consider that evidence supporting the PfE meets these concerns.
- 10.6** During the PfE Publication consultation 2021 there were no concerns raised by neighbouring authorities to Places for Jobs.

Offices

- 10.7** The PfE employment land requirement for offices to 2037 is 1,900,00sqm, this is derived from the past employment take up rates. It recognises the existing focus for offices will largely continue to 2037, this includes the City Centre, The Quays, Manchester Airport Enterprise Zone and Town Centres. There is a small area of Green Belt release proposed to accommodate office growth within Manchester Airport Enterprise Zone.
- 10.8** Within PfE demand and land supply has informed the distribution of office space to 2037 and approximately 3.1 million sqm office supply has been identified across the Plan area. The majority of this land supply is within the urban area and over 80% is in the Core Growth Area - the most accessible location via public transport and other sustainable transport modes. The distribution supports the Spatial Strategy, focusing growth in the Core Growth Area and is set out below in Table 10.1.

District	Office Existing Supply & Allocations Total 2021-2037 (sq m Floorspace)
Bolton	90,579
Bury	39,686
Manchester	2,233,914
Oldham	61,619
Rochdale	95,036
Salford	337,576
Tameside	25,902
Trafford	257,101
Wigan	9,349
Places for Everyone Plan	3,150,763

Table 10.1 PfE Distribution of Office Space to 2037

Industrial & Warehousing

- 10.9** The PfE target for industrial and warehousing requirement to 2037 is approximately 3,330,000sqm. There is evidence that past industrial and warehousing completions have been constrained by a lack of suitable sites within the Plan area, resulting in the city-region being unable to compete for some major occupiers.
- 10.10** The PfE is seeking to significantly increase the supply of sites across the northern parts of Greater Manchester to help increase the competitiveness of the north, including a major opportunity site called Northern Gateway. The existing supply of potential industrial and warehousing sites identified in the district's strategic employment land availability assessments are insufficient to meet the overall identified need. Consequently, Green Belt release is required and this has been focused in the north of the City-Region to support the Spatial Strategy, boosting competitiveness of the north.
- 10.11** To accommodate growth in industrial and warehousing provision in the Plan area a site selection exercise was followed testing sites against criteria promoting sustainable development. A number of industrial warehousing allocations require alteration to the Green Belt and these are set out in PfE and relevant evidence is provided to support them.

10.12 The proposed distribution of industrial and warehousing requirement across PfE is shown below:

District	Industry & Warehousing Existing Supply & Allocations Total 2021-2037 (sq m Floorspace)
Bolton	754,208
Bury	500,481
Manchester	92,641
Oldham	251,143
Rochdale	574,916
Salford	517,513
Tameside	271,812
Trafford	506,989
Wigan	490,685
Places for Everyone Plan	3,960,389
<p>1. The floorspace arising at Policy JP Allocation 1.1 'Heywood / Pilsworth (Northern Gateway)', has been split between Bury and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.</p> <p>2. The floorspace arising at Policy JP Allocation 2 'Stakehill', has been split between Oldham and Rochdale based on illustrative plans and may be subject to change following comprehensive masterplanning.</p>	

Table 10.2 PfE Distribution of Industry and Warehousing to 2037

Neighbouring Authorities - Accommodating PfE Growth

- 10.13** As the existing land supply is not adequate to accommodate all of PfE's office, industrial and warehousing requirement to 2037, there is a requirement to release some Green Belt. The NPPF paragraph 141 states the "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". One such way, is asking neighbouring authorities whether they can accommodate some of the identified need for development which cannot be met within the existing urban area.
- 10.14** At each stage of the joint plan from the draft GMSF 2016 onwards, neighbouring authorities outside of GM responsible for local plan preparation and employment provision have been asked if they can accommodate any of GM's employment need and now the PfE's employment need. When the Publication GMSF was being prepared neighbouring authorities were contacted in April 2020 and they have been contacted again in Spring 2021 as part of the PfE preparation. The responses from the Revised Draft GMSF up to the current position with the PfE are indicated below and so far the answer has been no neighbouring authority can accommodate our growth. A number of neighbouring authorities have either released or are proposing Green Belt release to accommodate their own growth requirement. The responses setting out the position of the local authority and why they are unable to consider accommodating any PfE employment need is set out in the Log of Collaboration.

Neighbouring Authority- request to accommodate office, industrial & warehousing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	April 2021 (Yes/No)
Blackburn with Darwen Borough Council	No response	No	No
Calderdale Council	No	No	No
Cheshire East Council	No response	No	No
Chorley Borough Council	No	No	No
High Peak Borough Council	No	No	No
Kirklees Council	No	No	No

Neighbouring Authority- request to accommodate office, industrial & warehousing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	April 2021 (Yes/No)
Rossendale Borough Council	No	No	No
Stockport Metropolitan Borough Council	n/a	n/a	No
St. Helens Council	No response	No	No
Warrington Borough Council	No	No	No
West Lancashire Borough Council	No	No	No

Table 10.3 Neighbouring Authority Responses to GMCA ask to Accommodate Growth

Stockport Metropolitan Borough Council

- 10.15** Following Stockport's departure from the joint plan making process Stockport sent a letter setting out their intention to collaborate with the PfE districts. They also requested that the PfE consider continuing to accommodating some of Stockport's employment need which had previously been redistributed across GM as part of the GMSF.
- 10.16** After considering the request, the PfE districts responded with a letter dated 19th April stating:
- "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 2037."
- 10.17** The letter above was followed by a meeting on 26th May 2021 between PfE representative and Stockport MBC and one of the outcomes recorded on the Duty to Co-operate Proforma stated:

"Ongoing discussions to continue on amount of Stockport's Industrial and Warehousing employment land to be accommodated in PfE. May need interim position for SofCG supporting PfE in Autumn but can change in subsequent iterations, if required."

- 10.18** Due to the tight timescales to move the PfE to Publication stage, a further letter was sent by PfE districts to Stockport MBC on 11th June 2021 reflecting the update given by Stockport on their Local Plan preparation and the Call for Sites process and requesting evidence to progress collaboration on accommodating some of Stockport's employment provision in the PfE, it stated:

"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."

- 10.19** Stockport continues to prepare evidence to support preparation of its Local Plan. Stockport confirmed on 10th February 2022 that this ongoing work was not anticipated to result in a significant change to their employment land supply position indicating that there will be unmet need. However, as Stockport has confirmed that this work is only in the process of being initiated, it is too early to be able to have conclusive discussions on potential distribution of development needs. The PfE districts will consider the position further when they have received the information required and give full consideration to Stockport's request.

- 10.20** In the light of this, the districts will 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.

PfE Statement of Common Ground 3

Employment Distribution

Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan authorities all agree to the employment need and distribution as set out above and in Table 6.1 "Office Land Supply 2020-2037" supporting policy JP-J3 Office Development and Table 6.2 Industry and Warehousing Land Supply 2020-2037" supporting policy JP-J4 Industry and Warehousing within the Places for Everyone Plan.

The neighbouring authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Kirklees, Rossendale, St. Helens, Stockport, Warrington and West Lancashire confirm they are unable to meet any of PfE's employment requirement.

The preparation of Places for Jobs meets the duty to co-operate requirements.

11 Places for Homes

- 11.1 The approach to housing policies in the PfE has been informed by NPPF, NPPG, local strategies, PfE objectives, evidence and consultation comments, including collaborative activity with duty to co-operate bodies. The PfE has followed the standard methodology set out in the PPG (December 2020 update) to calculate housing need and used the 2014-based household projections as the starting point for the assessment of Local Housing Need. The preparation of the PfE plan required existing evidence to be revisited to take account of Stockport's departure from the joint plan process and addendum's prepared and should be read with the existing evidence.
- 11.2 As strategies and evidence have become available it has been shared as part of the evidence base. Some of the evidence prepared to support the joint plan has been shared with duty to co-operate bodies outside of consultation periods and views sought on approaches to methodologies. Some of the evidence has been updated at each iteration and shared again. Key pieces of evidence for the PfE include:
- Greater Manchester Strategic Housing Market Assessment
 - Local Housing Need for PfE (set out in the SHMA)
 - PfE Housing Land Supply
 - GMSF Strategic Viability Report Stage 1 and Stage 2

Greater Manchester Strategic Housing Market Assessment

- 11.3 The SHMA presents a clear, evidenced picture of the Greater Manchester housing market and how it is changing, to provide an assessment of future needs for both market and affordable housing, and to explore the housing needs of different groups within the population over the plan period. One of the main conclusions is that Greater Manchester can be defined as a single housing market for planning purposes.

Local Housing Need for PfE

- 11.4 The local housing need has followed the standard methodology which takes projected population and household growth and applies an affordability uplift to provide a local housing need figure, plus an additional 35% uplift which applies to the largest cities and urban areas which includes Manchester City Council.

- 11.5** The PfE Plan sets a housing requirement of 164,880 homes for the period to 2037. This requirement is derived from the nine strategic plan making authorities local housing need.

Housing Land Supply

- 11.6** The PfE Plan has sought to accommodate all its own needs in line with the Growth and Spatial Options Paper. The PfE Housing Land Supply forms a key component of the evidence base. Each of the nine districts has carried out their own assessment of housing land availability and prepared their own Strategic Housing Land Availability Assessment (SHLAA). The PfE Housing Land Supply brings together information from each of the nine districts to identify the total housing land supply across the plan area.

GMSF Strategic Viability Report Stage 1 and 2

- 11.7** As part of preparation of the October 2020 GMSF a Strategic Viability Assessment of the Spatial Framework (VASF) was prepared by Three Dragons to test whether the policy requirements in the GMSF would threaten the development viability of the plan as a whole. This was published in September 2020 as part of the evidence base accompanying the GMSF. The evidence underpinning the report was collected during 2019 and early 2020. A subsequent addendum was prepared in June 2021.
- 11.8** The underlying message of Stage 1 of the viability testing is that most development types can meet the policy requirements of the draft plan in the medium to high value areas (VA1-3). However, in low value areas of the plan area, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft plan.
- 11.9** Stage 2 assessed viability of the allocations which showed the majority were viable with some sites requiring public support to proceed.

Places for Everyone - Housing Allocations

- 11.10** The existing land supply within the urban area almost meets the local housing need within the Plan. However, meeting the numerical need alone, is not enough. The Plan must be able to demonstrate that its land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver a balanced and inclusive growth. A buffer has been included in the overall land supply which is considered sufficient to ensure deliverability.
- 11.11** In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it has been necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options, it has been concluded that in order to achieve this, it has been necessary to remove some land from the Green Belt and to allocate this land for residential development.

- 11.12** Sites have been identified through a site selection process with criteria supporting sustainable development. New sites requiring alteration of the Green Belt boundary are set out in PfE and relevant evidence is provided to support them.

Neighbouring Authorities - Accommodate PfE Housing Growth

- 11.13** In order to alter the Green Belt boundary and bring forward sites for housing, the NPPF paragraph 141 states that "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development". One such way, is to have discussions with neighbouring authorities and request whether or not they can accommodate some of the identified need for development.
- 11.14** Each of the neighbouring authorities outside of the PfE Plan area responsible for local plan preparation and housing provision has been asked on a number of occasions if they are able to accommodate any of the joint plans housing need. As part of the preparation for the Publication GMSF neighbouring authorities were contacted in Spring 2020 and following Stockport's departure again in Spring 2021 as part of the PfE preparation. The responses from our neighbouring authorities is summarised below. A number of neighbouring authorities have either released or are proposing Green Belt release to accommodate their own housing requirement and are unable to accommodate our growth. The full responses from the neighbouring authorities are provided in the PfE Log of Collaboration.

Neighbouring Authority- response to request to accommodate housing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	Spring 2021 (Yes/No)
Blackburn with Darwen Borough Council	No response	No	No
Calderdale Council	No	No	No
Cheshire East Council	No response	No	No
Chorley Borough Council	No	No	No
High Peak Borough Council	No	No	No
Kirklees Council	No	No	No

Neighbouring Authority- response to request to accommodate housing growth	Revised Draft 2019 (Yes/No)	Spring 2020 (Yes/No)	Spring 2021 (Yes/No)
Rossendale Borough Council	No	No	No
St. Helens Council	No response	No	No
Stockport Metropolitan Borough Council	n/a	n/a	No
Warrington Borough Council	No	No	No
West Lancashire Borough Council	No	No	No

Table 11.1 Neighbouring Authority Responses to GMCA ask to accommodate growth

Housing Distribution PfE

11.15 Based on the position to date there are currently no unmet needs identified by the PfE districts and we are fully accommodating our growth within our borders which aligns with GM as the housing market area and travel to work area. The distribution of housing targets has been in line with the Spatial Strategy: focusing on the Core Growth Areas; boosting northern competitiveness; and sustaining southern competitiveness. The amount of buffer identified is in response to national policy, allowing for flexibility in provision and in response to identified viability issues, especially in the northern districts.

11.16 The local housing need and distribution across each of the nine districts is set out in the PfE and shown in Table 11.1. This also shows the scale of the buffer in each district and the total target in each district as a percentage of their LHN.

District	2021-2037 Local Housing Need	2021-2037 Buffer	Total target as % of LHN	Total Land Supply 2021-2037
Bolton	12,528 (783pa)	2,083 (17%)	100%	14,672
Bury	9,456 (591pa)	1,388 (19%)	76%	8,616
Manchester	56,432 (3,527pa)	3,072 (5%)	100%	59,600

District	2021-2037 Local Housing Need	2021-2037 Buffer	Total target as % of LHN	Total Land Supply 2021-2037
Oldham	10,832 (677pa)	1,917 (18%)	100%	12,801
Rochdale	8,048 (503pa)	1,576 (16%)	122%	11,434
Salford	21,184 (1,324pa)	9,495 (36%)	125%	36,023
Tameside	10,416 (651pa)	42 (6%)	74%	8,200
Trafford	22,032 (1,377pa)	2,744 (15%)	81%	20,698
Wigan	13,952 (872pa)	3,178 (20%)	111%	18,732
PfE Plan Area	164,880 (10,305pa)	25,895 (16%)	100%	190,776

Table 11.2 Housing Distribution PfE

Duty to Co-operate Comments Since January 2019

- 11.17** High Peak raised concerns 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. They stated the re-distribution of housing in GM means Tameside and Stockport are not meeting their own need but it is being redistributed into Manchester. 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 Tameside and Stockport (these comments were made prior to Stockport MBC's decision to leave the joint plan making process). Similar comments were made by West Lancashire who are concerned the housing figures do not match the ambitious employment growth and this could lead to more pressure on neighbouring authorities to release more land for housing.
- 11.18** West Lancashire also raised concerns there is not enough flexibility in the local housing supply to meet local housing need requirements. Linked to this they raise concerns the PfE should identify safeguarded land in order to meet the longer term development needs stretching beyond the plan period and to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Response to Duty to Co-operate Comments

- 11.19** The nine PfE districts are seeking to meet all local housing need within their areas and have not identified any unmet need which neighbouring authorities are being asked to provide. The PfE decided to share housing need between districts to meet the overall spatial strategy focusing on the Core Growth Area, boosting the competitiveness of the north and sustaining southern competitiveness.

- 11.20** The PfE SHMA considers that whilst Greater Manchester has important and valuable relationships with neighbouring districts and further afield, it is reasonable to define Greater Manchester as a housing market area for strategic planning purposes.
- 11.21** The PfE Local Housing Supply identifies sufficient housing land to meet needs to 2037 with a buffer of 16% to take into account flexibility and choice and in response to challenging viability in the Northern districts. This buffer means the Green Belt boundary will endure beyond the plan period. Notwithstanding this, a policy has been included in the PfE in relation to safeguarded land.
- 11.22** Chorley has raised concerns about gypsy and travelling show people provision and that this is not dealt with in the PfE Plan. Policy JP-H3 Type, Size and Design of New Housing indicates that District's local plans will deal with housing provision to accommodate specific groups, including gypsies, travellers and travelling show people.

Stockport Metropolitan Borough Council

- 11.23** Following Stockport's departure from the joint plan making process they sent a letter setting out their intention to collaborate with the PfE districts. They also requested that the previous position in the PfE had seen some of Stockport's housing need redistributed across GM. They asked if the PfE intends to continue on this basis of previously agreed levels of redistribution which were 30% of Stockport's total Local Housing Need provision.
- 11.24** After consideration of this letter, PfE districts responded with a letter dated 19th April stating:

"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."

- 11.25** A meeting was held on 26th May 2021 between PfE representative and Stockport MBC and one area of discussion was the evidence being commissioned by Stockport seeking to identify any new sites for housing, densities and role of the town centre.
- 11.26** A further letter was sent by PfE representatives to Stockport MBC on 11th June 2021 and this recognised that housing evidence was still being gathered by Stockport and stated:
- "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".
- 11.27** Stockport continues to prepare evidence to support preparation of its Local Plan. Stockport confirmed on 10th February 2022 that this ongoing work was not anticipated to result in a significant change to their housing land supply position indicating that there will be unmet need. 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.
- 11.28** In the light of this, the districts will 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.

Duty to Co-operate Comments PfE Publication Consultation

- 11.29** Chorley Council and St Helens Council support the PfE seeking to fully meet Local Housing Need and reiterate their position that they are unable to accommodate any unmet housing need from PfE. No further comments relating to housing have been received from High Peak Borough Council or West Lancashire Borough Council.
- 11.30** Chorley Council reiterated their comment on gypsies travellers and travelling show people and this was also raised by Cheshire West and Chester, even though not a duty to co-operate body. The scope of the PfE is to provide strategic policy as set out in paragraph 1.57 of the PfE. It does not cover everything that a district local plan would and matters such as gypsies, travellers and travelling show people is deemed to be a matter for individual district local plans.

PfE Statement of Common Ground 4

PfE Housing Distribution

Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan authorities have agreed the local housing need to 2037 and its distribution, as set out above and in Table 7.1 "Sources of housing land supply 2020-2037", supporting policy JP-H1 Scale, Distribution and Phasing of New Housing Development in the Places for Everyone. All nine authorities agree to meeting the combined housing need within the PfE boundary.

The neighbouring authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Kirklees, Rossendale, St. Helens, Stockport, Warrington and West Lancashire have confirmed they are unable to meet any of PfE's housing need.

The preparation of Places for Homes meets the duty to co-operate requirements.

Chew Brook Vale (Robert Fletchers)

- 11.31** The Peak District National Park has raised concerns about the Chew Brook Vale allocation over various iterations of the joint plan largely related to the impact of this proposed development on the Peak District National Park. The Peak District National Park 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.
- 11.32** Oldham Council and Peak District National Park met to discuss the comments made to the Revised GMSF 2019 in May 2020. They discussed the need for an exemplary landscape setting to reduce impact on the National Park, altering the boundary, HRA and specific policy wording.
- 11.33** The allocation has been amended to ensure development is in accordance with a masterplan and design code. The allocation boundary has reduced and now relates to previously developed land and the number of homes planned has been reduced to around 90 units to reflect this. 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. The reference to the proposed increased number of holiday lodges has been removed.

Duty to Co-operate Comments PfE Publication Consultation

- 11.34** Peak District National Park Authority sought a number of references to the National Park within the PfE to give it more prominence. Although references already exist in the PfE Plan, the PfE districts are committed to joint working with the Peak District National Park Authority, to resolve this matter in the most appropriate way.
- 11.35** Peak District National Park Authority also welcome a number of changes to the Chew Brook Vale allocation in response to their previous comments. They wish to continue working with the landowner, prospective developer and Oldham Borough Council particularly on the development and implementation of a Visitor Management Plan for the site. They also made an number of comments on transport accessibility and approach to affordable housing.

PfE Statement of Common Ground 5

Chew Brook Vale

Chew Brook Vale allocation has been amended to reflect the most up to date evidence supporting the PfE and take into account concerns raised by Peak District National Park. Oldham Council will continue to collaborate with Peak District National Park with regard to proposals for Chew Brook Vale, to resolve any detailed issues in the most appropriate way, including the preparation and implementation of the Visitor Management Plan.

The preparation of the Chew Brook Vale allocation meets the Duty to Co-operate requirements.

12 Greener Places

- 12.1** The approach to policies in A Greener Place has been informed by NPPF, NPPG, local strategies, PfE objectives, evidence and consultation comments, including collaborative activity with duty to co-operate bodies. They have also been shaped by the 25 Year Environment Plan and the Urban Pioneer Project. The preparation of the PfE plan required existing evidence to be revisited to take account of Stockport's departure from the joint plan process and addendum's prepared and should be read with the existing evidence. Beyond the NPPF, the approach to a Greener Places chapter in the Places for Everyone Plan has been informed by a variety of evidence and strategies. Key studies include:
- Greater Manchester Five Year Environment Plan
 - Green Infrastructure: Priority Green and Blue Infrastructure Study
 - Trees and Woodland Strategy for Greater Manchester
 - Greater Manchester Landscape Character & Sensitivity Assessment

- Greater Manchester Accessible Natural Greenspace Analysis
- Greater Manchester Biodiversity Net Gain
- Soil Resources including Defra Peatland Pilot
- Greater Manchester Clean Air Plan
- Stage 1 Greater Manchester Green Belt Assessment
- Stage 2 Greater Manchester Green Belt Study

Green Infrastructure: Priority Green and Blue Study

12.2 The Priority Green and Blue Study identified and mapped a strategic priority green infrastructure network for Greater Manchester. The study has built on a range of existing data and previous studies. The study identified:

- a priority green infrastructure network;
- developed an ecological network for GM made up of uplands, river valleys and canals, woodlands and trees, lowland wetlands, major parks and green spaces;
- Strategic opportunity areas and sites for green infrastructure enhancement;
- Targets and standards.

Greater Manchester's Tree and Woodland Strategy

12.3 City of Trees, the ten districts of Greater Manchester, Natural England, the Woodland Trust and the Forestry Commission have produced 'All Our Trees: Greater Manchester's Tree & Woodland Strategy'. The strategy provides the basis for the protection and expansion of Greater Manchester's forest canopy, assisting the planning process, and setting out defined actions that need to be taken, based on clear evidence about the current tree resource. It also describes where new tree planting should be targeted, and how to make sure new and existing trees and woodlands continue to provide key benefits.

Landscape Character and Sensitivity Assessment

12.4 The GMCA commissioned LUC to complete a landscape character and sensitivity assessment across Greater Manchester. The assessment:

- Provides an evidence base for the landscape character/sensitivity of Greater Manchester which takes account of changes in land use, pressures for change including characterisation of the landscape, identification of sensitive and non-sensitive areas.
- Contributes towards the development of the Greater Manchester Spatial Framework by bridging the Natural England National Character Area profiles, North West Regional Character Framework and character assessments undertaken by individual districts.
- Considers cross boundary matters, in particular views from the Peak District National Park and Natural Improvement Areas and identifies anomalies and discontinuities as well as potential enhancements and improvements.

- Provides guidance and advice to help shape the scope of more detailed area specific assessments where required.

Greater Manchester Accessible Natural Greenspace Analysis

- 12.5** The GMCA commissioned Natural England, supported by Ordnance Survey, to undertake a Greater Manchester Accessible Natural Greenspace Analysis. The study complements the existing greenspace audits and strategies that have been produced by the ten districts of Greater Manchester to support their own district Local Plans by considering and identifying a consistent evidence base for accessible greenspace. This will enable a strategic overview of greenspace provision in Greater Manchester.

Greater Manchester Biodiversity Net Gain

- 12.6** The GMCA is working closely with Natural England to ensure that the city region is ready to implement biodiversity net gain requirements in new development, recognising that the National Planning Policy Framework already requires biodiversity net gains to be demonstrated in development proposals and that the forthcoming Environment Bill will make biodiversity net gain in development a mandatory requirement. So far a Biodiversity Net Gain Roadmap has been produced which established a task group to oversee the Roadmap on behalf of the Local Nature Partnership. In addition, a Biodiversity Net Gain Guidance was produced in May 2019 which recommends the processes to embed biodiversity net gain into planning for development. The GMCA is working with Natural England on a Greater Manchester Biodiversity Net Gain Implementation Action Plan. The action plan will set out the key activities required to get Greater Manchester ready for biodiversity net gain in development as a legal requirement.

Soil Resources

- 12.7** During the preparation of the GMSF, the GMCA engaged Natural England for advice on how the joint plan should plan positively for soil resources. The detail of Natural England's advice is given in the Natural Environment Topic Paper, in summary the advice sought to safeguard the Best and Most Versatile agricultural land, avoid development that would disturb or damage other soils of high environmental value, ensure soil resources are conserved and managed in a sustainable way.
- 12.8** Consequently, Policy JP-G 9: A Net Enhancement of Biodiversity seeks to safeguard, restore and sustainably manage our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. The policy also expects development to achieve a net gain in biodiversity. The approach taken in Policy JP- G 9 is consistent with the England Peat Action Plan (May 2021).

- 12.9** Also, a new pathfinding peatland restoration pilot has been launched in Greater Manchester. The programme explains how local stakeholders can work together to improve the condition of English peatlands to help wildlife, people and the planet now and into the future.

Duty to Co-operate Comments Since January 2019

- 12.10** The issue of cross boundary landscapes and green infrastructure and networks has been raised by Natural England, Greater Manchester's Natural Capital Group (GM Local Nature Partnership), West Lancashire, Rossendale, High Peak, Peak District National Park and Salford Clinical Commissioning Group. The above provides a consistent evidence base, assessing the quality and sensitivity of different landscapes, biodiversity, and considering cross-boundary relationships.
- 12.11** 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 Draft GMSF to deliver natural capital net gains in the areas of wetland habitat and enable a functioning nature recovery network.
- 12.12** 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. Suggested amendments to the following policies are made: the Lowland Wetlands and Mosslands; Uplands; Urban Green Space; Trees and Woodland; Green Infrastructure Opportunity Areas and; 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).
- 12.13** Cheshire East made the comment there is the opportunity to improve Green Infrastructure links between Greater Manchester and Cheshire East, including ensuring development at the Airport and proposed HS2 positively contribute. Proposals should protect and develop wildlife and recreational links between and across the Local Authority boundaries, and be sympathetic to Green Infrastructure.
- 12.14** Environment Agency seek amendments to the Green Infrastructure policy to better reflect the role it can play in managing current and future flood risk, further amendments have been incorporated. They sought reference to natural flood management in JP-G5 Uplands and this has been inserted.
- 12.15** 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.

Response to Duty to Co-operate Bodies

- 12.16** 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 above. Changes to the A Greener Places chapter have taken on board many of Natural England's comments. It has strengthened the references to the approach to natural capital. The definition of Green Infrastructure has been improved in policy JP-G 2 Green Infrastructure Network. The role of different types of green infrastructure to Nature Recovery Network have been added and recognised in the Plan. Amendments have been made to various policies to reflect updated evidence and also respond to 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.
- 12.17** Natural England made comments that some sections of undeveloped mossland are considered inappropriate for future development. However they are well-located to make a notable contribution to delivering more balanced and inclusive growth. Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.

Duty to Co-operate Comments PfE Publication Consultation

- 12.18** 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.
- 12.19** Natural Capital Group recognised that engagement with the group 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.
- 12.20** The following duty to co-operate bodies who made comments regarding Green Infrastructure at the revised draft GMSF stage did not make comments relating to Green infrastructure at the PfE Publication stage: Cheshire East, Environment Agency, High Peak, Peak District National Park, Rossendale, Salford Clinical Commissioning Group and West Lancashire.

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Green Infrastructure

The collaborative approach to the development of the evidence base, understanding cross boundary issues and policy development has informed preparation of policies in the chapter A Greener Places. The evidence base and PfE A Greener Places provide a sound basis for continued collaboration between PfE districts, the GM Natural Capital Group (on a wide range of matters including peat and carbon neutrality), Natural England and cross boundary neighbouring authorities: Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Peak District National Park, Kirklees, Rossendale, St. Helens, Stockport, Warrington and West Lancashire.

Issues raised by Natural England have been fully considered in the preparation of the PfE plan and active collaboration has been sustained from the early stages of plan preparation to the current plan stage. The amendments to the PfE plan now meet the majority of concerns raised by Natural England, however, it is acknowledged that their comments regarding development on peat will need further discussion and collaboration through the final stages of the PfE Plan and the preparation of district local plans, masterplans and SPD's.

The preparation and development of the A Greener Places chapter meets the Duty to Co-operate requirements.

Green Belt

- 12.21** The PfE shares its Green Belt with all the neighbouring districts. As the land supply for both housing and employment has shown it is either inadequate to meet need or not sufficiently flexible to deliver a balanced and inclusive growth and achieve the overall spatial strategy, resulting in a need to release land from the Green Belt. To accommodate the PfE housing and employment requirement an assessment of the Greater Manchester Green Belt has been undertaken. The City-Region has sought to share relevant evidence with neighbouring authorities and the methodology to the Stage 1 Greater Manchester Green Belt Assessment 2016 was shared with neighbouring authorities in March 2016. The comments received were discussed with the steering group and incorporated as appropriate.

- 12.22** The Stage 1 Green Belt Study assessed the whole of the Green Belt in Greater Manchester in terms of its contribution to the five purposes of the Green Belt. The stage 2 Green Belt study assesses the potential impact on the Green Belt resulting from release of land within the development allocations and new Green Belt additions proposed by the PfE. It also assessed the contribution made by new additions to the Green Belt and the combined effect of proposed releases and proposed new additions on the strategic functioning of the Green Belt. It also considered the potential to enhance the beneficial use of land which remains in the Green Belt and is close to the proposed allocations. Following Stockport's departure from the joint planning process a further addendum was added to Stage 2 Greater Manchester Green Belt Study to reflect the changes between the GMSF 2020 and PfE 2021. This took into account the removal of the Stockport proposed allocations in the Green Belt and also other changes to other proposed allocations in the PfE.

Duty to Co-operate Comments Since January 2019

- 12.23** High Peak raised concerns about the evidence supporting the proposed Green Belt alterations and believe that the scale of the Green Belt loss and additions proposed means there is a need for a comprehensive strategic review of the Greater Manchester Green Belt. They reflect on sharing a common area of Green Belt which extends into both Stockport and Tameside (comments made prior to Stockport's departure).
- 12.24** West Lancashire have raised concerns that there is not enough flexibility in housing land supply and safeguarded land should be identified to ensure Green Belt boundaries do not need to be altered at the end of the Plan period.
- 12.25** Peak District National Park believe the policy wording should be clarified with regard to allowing a relaxation of Green Belt policies if a proposal is in accordance with a relevant allocation policy. Natural England have made a number of specific comments on individual allocations which affect the Green Belt but not to the principle of altering the Green Belt.

Response to Duty to Co-operate Comments

- 12.26** The approach to the Green Belt has been updated in response to issues raised to the previous draft and a new policy has been included in relation to safeguarded land, and additional evidence prepared in relation to the proposed changes to the Green Belt boundary. It is judged that this substantial part of the evidence base responds to concerns outlined in consultation comments and helps to underpin the important decisions made to amend Green Belt boundaries. With regard to changes to Policy JP-G 10 The Green Belt itself, the policy is largely unaltered from the 2019 version.

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The Green Belt

The local authorities of Blackburn with Darwen, Calderdale, Cheshire East, Chorley, High Peak, Peak District National Park, Kirklees, Rossendale, St. Helens, Warrington and West Lancashire received a copy of Greater Manchester's Green Belt Methodology for the Stage 1 study and were given the opportunity to comment.

The neighbouring authorities (listed above), Stockport MBC and Peak District National Park have had the opportunity to consider Stage 1 Green Belt Study and Stage 2 Green Belt Assessment with PfE Addendum.

Stage 1 Green Belt Study and Stage 2 Green Belt Assessment with PfE Addendum provides an adequate evidence base to alter the Green Belt boundary as set out in Policy JP-G10 The Green Belt, within PfE and enable the PfE districts to accommodate growth needs to 2037.

The PfE, Policy JP-G10 The Green Belt and relevant allocations meet the Duty to Co-operate requirements in the preparation of the Green Belt policy.

Habitat Regulation Assessment

- 12.27** Since the 2019 Revised GMSF Draft the GMCA have engaged Natural England in the preparation of the Habitats Regulations Assessment (HRA). The HRA must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the internationally important interest features of a European site. Since 2019, the GMCA held regular meetings with Natural England to progress the HRA.
- 12.28** The GMCA has shared a draft version of the HRA (updated since 2019) with Natural England for review and comment. The GMCA responded to Natural England's comments by commissioning an air quality assessment to model the implications of changes in air quality on European Protected sites that could potentially affected NOx, nitrogen deposition and ammonia critical loads arising from changes in vehicle movements in Greater Manchester or within close proximity of the Greater Manchester boundary. The first phase of the study: the screening assessment, has been completed and shared with Natural England for comment. The GMCA are committed to working with Natural England to complete the second phase of the assessment: the appropriate assessment, which will assess the air quality impacts on European Protected sites in more detail and assess appropriate mitigation measures.
- 12.29** The GMCA have also responded to Natural England's comments on functionally linked land, recreation disturbances, water pollution and in-combination effects in the HRA.

Duty to Co-operate Comments PfE Publication Consultation

- 12.30** Natural England submitted comments to the PfE Publication stage, 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."
- 12.31** 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.
- 12.32** Natural England also commented on water pollution but did not consider this a matter of soundness or legal compliance.
- 12.33** 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 waste water can be managed effectively to ensure that there will be no adverse impact on the Mersey Estuary SPA.

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Habitat Regulation Assessment

The HRA is being updated to ensure it is in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). The PfE districts, TfGM and GMCA are committed to continuing to working collaboratively with Natural England on an ongoing basis to assess the impact of PfE on European Protected sites and species, including any mitigation measures that might be required.

Great Manchester Wetlands Nature Improvement Area

- 12.34** Lowland wetlands and mosslands cover substantial areas within Wigan, west Salford and south-west Trafford, where they form part of the Great Manchester Wetlands Nature Improvement Area which extends into Warrington and measures around 40,000 hectares in total.

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Great Manchester Wetlands Nature Improvement Area

The Great Manchester Wetlands Nature Improvement Area covers substantial areas within Wigan, west Salford and south-west Trafford and extends into Warrington. Given the cross boundary nature of the designation there is a requirement for continued collaborative working between Greater Manchester Combined Authority, Salford City Council, Trafford Borough Council and Wigan Borough Council in order to preserve and enhance this ecological network.

13 Places for People

Historic Environment Background Paper

- 13.1** An historic Environment Background Paper has been prepared to bring together a summary of Greater Manchester's historic environment. It provides a historic context for the Plan, starting with Greater Manchester's role in the industrial revolution and moving through the significant periods of its historic past. The Paper has been influenced by a range of studies related to the historic environment as well as input from officers from GMCA, Historic England, the Greater Manchester Archaeology Advisory Service (GMAAS) and the Greater Manchester Conservation Officer's Group (GMCOG), including workshops held in July 2019 and July 2020.

- 13.2** The evidence base presented within the Background Paper demonstrates the rich diversity of Greater Manchester's historic environment. By examining heritage assets, exploring existing legislation and policy and identifying issues and trends this paper has revealed opportunities for the PfE to better preserve and enhance the historic environment. This can be achieved by:
- Ensure the PfE sets out a positive strategy for conservation, enhancement and enjoyment of the historic environment;
 - Recognise the value of the historic environment in achieving a sustainable and resilient city-region;
 - Appreciate the distinctive character of the PfE area and how it can be a valuable source of prosperity, wellbeing and community cohesion;
 - Complement the conservation and enhancement of heritage with the promotion of high quality design;
 - Highlight heritage at risk;
 - Ensure an up to date evidence base for the purposes of monitoring and review;
 - Developing policies and supporting opportunities to facilitate a reduction in the number of heritage assets at risk of decay and vacancy across PfE; and
 - Providing a robust implementation strategy for the framework that gives equal weight to delivery of all aspects of the plan, including conservation of the historic environment.
- 13.3** The Paper gives an historic context and describes key drivers of settlement development. It provides a summary of important heritage assets, which contribute to the distinctive character and identity of Greater Manchester. It then quantifies and describes the types of heritage assets (including designated and non designated) to be found. It also covers the Greater Manchester Urban Historic Landscape Characterisation (HLC) project which has identified a number of historic landscape character types. It sets out the evidence base available at the national level and in the PfE districts. It recognises the role of the historic environment to various sectors of the economy, design, sustainability and climate change.
- 13.4** The Paper sets out a series of recommendations to encourage the long-term consideration of heritage assets in the PfE and other areas of work, such as the Heritage at Risk Register and the Historic Environment Record.

Archaeological and Built Heritage Assessment and Screening Exercise

- 13.5** A screening exercise has been undertaken to identify the more sensitive sites where there is known or potential archaeological/ built heritage significance that might be impacted on by development proposals. This sought to provide an understanding of the Historic Environment to comply with the National Planning Policy Framework by:
- Reviewing and enhancing existing Historic Environment Records that fall within the land allocations and using a 250 metre buffer zone;

- Examining HER and any other relevant databases (such as the National Heritage List) to identify and map non-designated and designated heritage assets;
- Undertaking a historic map regression exercise to identify previously unrecognised heritage assets with an archaeological interest and confirm location and extent of known assets;
- Reviewing published and secondary sources, such as 'grey literature', local publications, thematic surveys (historic landscape characterisation, moated sites, wetlands, mills etc), and including the North West Regional Research Framework for the Historic Environment;
- Analyse readily available aerial photographs and lidar data where relevant;
- Undertake site visits and walkovers to ground desk based research (using public access only);
- Screen out those sites with no or very low archaeological interest.

Site Level Heritage Assessments

- 13.6** Following the screening exercise above a site level heritage assessments have been carried out for more sensitive sites. This has been used to inform the approach to individual allocations.

Duty to Co-operate Comments Since January 2019

- 13.7** 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. They suggested a reason this may be lacking is due to gaps in the evidence base underpinning the plan.
- 13.8** 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 meeting 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.

- 13.9** Subsequent to the meeting above further regular meetings have taken place to discuss the content of the draft PfE. In March 2021 a formal meeting to clarify the position following the regular catch-up's took place and discussed the details of the approach to the historic environment in the PfE. This included the changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment. The main areas discussed were Vision and lack of emphasis of the built/historic environment in the plan. It was explained, there are difficulties around changing the vision as it has been agreed by districts and the Mayor to use the Greater Manchester Strategy Vision.
- 13.10** Also discussed were site allocation policies – Historic England requested to see the HIA/HEA work specifically referenced consistently through the site allocation policies, where this was relevant. It was agreed that this would be considered, either within policy or as a footnote, but also important to make clear that further work would be required, the HIA is a starting point. It is considered the PfE has made relevant amendments to address this point.
- 13.11** With regard to the heritage policy - Historic England would like to see the reasoned Justification strengthened – contextual information is good around the 'why' but weak on the 'how' particularly around "significance". An outcome of the meeting was Historic England agreed to send a table of proposed changes, ranked in order of importance in terms of soundness/risk to historic environment.
- 13.12** The approach to the historic environment has been updated in response to issues and collaborative activity set out above. 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.

Duty to Co-operate Comments PfE Publication Consultation

- 13.13** During the Publication PfE consultation stage Historic England submitted comments to the PfE thematic policies, allocations and the IA supporting the PfE. They state that the plan goes some way to providing a positive strategy for the historic environment, however they consider there is still a need for further amends to the plan to create a positive strategy for the conservation and enjoyment of the historic environment. They have acknowledged the changes to the PfE and have not raised any further comments about the evidence base underpinning the approach to heritage and the historic environment. They express general support for policies in the Places for People chapter and Policy JP-P2 Heritage, albeit with further wording changes.

- 13.14** Since the end of the consultation period in October 2021, discussions have been ongoing with Historic England to resolve as many of their concerns as possible. Details are set out in the Duty to Co-operate Statement and Log of Collaboration. In their letter dated 27th January 2022, they confirmed the PfE districts had met their Duty to Co-operate requirements and their position with regard to the PfE Statement of Common Ground, see Appendix 4: Historic England PfE Statement of Common Ground Position.

PfE Statement of Common Ground 10

Heritage

The Historic Environment Background Paper, the Archaeological and Built Heritage Assessment and Screening and, where relevant, site level heritage assessments, provide the appropriate level of evidence for the Places for Everyone, and was used to inform and amend policy JP-P 2 Heritage and relevant allocation policies up to and including PfE 2021. The PfE districts will continue to work collaboratively with Historic England during the final stages of the PfE Plan and the preparation of their local plans, masterplans and SPDs.

Historic England believe the preparation of PfE meets the duty to co-operate requirements and PfE districts have collaborated effectively with Historic England and are committed to joint working going forward.

14 Connected Places

- 14.1** Good transport connections, reducing the need to travel, encouraging sustainable forms of travel and establishing sustainable transport patterns in new development have been a priority in the PfE and informed the site selection process for allocations. Substantial growth planned to 2037 is expected within the existing urban area and it is important to understand how the existing transport network functions, the impact of the proposed growth within the urban area and the impact of proposed growth from the allocations.
- 14.2** The transport evidence underpinning the PfE consists of a range of documents and strategies that address critical issues and inform our approach to transport policy and implementation in Greater Manchester is informed by a series of strategies including :
- The Greater Manchester Transport Strategy 2040;
 - Our Five Year Transport Delivery Plan 2021- 2026 and Local Authority Implementation Plans;
 - Right Mix Technical Note seeking to achieve the right mix vision for 50% of trips to be made by sustainable modes by 2040;

- Clear Air Plan (CAP) and Zone documentation;
- Electric Vehicle Charging Infrastructure Strategy
- City Centre Transport Strategy;
- Streets for All;
- Greater Manchester Walking and Cycling Investment Plan;
- Bus Reform documentation;
- Our Prospectus for Rail;
- PfE: Existing Land Supply and Transport Technical Note and associated addendum;
- PfE Transport Locality Assessments (TLAs) for the Allocations and associated addendums;
- PfE Plan Allocations Strategic Modelling Technical Note (SMTN).

14.3 Key PfE documents providing evidence of the current situation on our transport network and the impact of proposed growth in housing and employment to 2037 include:

- The PfE Existing Land Supply Note examining the spatial distribution of the Existing Land Supply – identifying clusters of growth and the transport interventions highlighted in the 5-Year Delivery Plan that will support growth in those areas.
- PfE Transport Locality Assessments (TLAs) for the Allocations. These assessments examine the likely local impact of the development of the Allocation on the transport network and identifies where mitigation may be needed. [PfE 2021 review addendums have been produced for each Local Authority to reflect Stockport's withdrawal from the GMSF and other minor updates to the evidence that may influence the conclusions of each Locality Assessment. These addendums should be read alongside the original Locality Assessment].
- PfE Allocations Strategic Modelling Technical Note (SMTN). This provides analysis of the potential strategic impact of growth on our transport network in a “policy-off” scenario. [An updated version of this technical note has been produced to reflect Stockport's withdrawal from the GMSF and other minor updates to the evidence and model output data associated with the PfE Plan].

14.4 It is important to recognise the role of the spatial options and site selection process in achieving transport objectives for the plan. The decision-making process that lead to the initial identification of allocations sought to maximise the scope for sustainable travel choices by:

- minimising the number of allocations in greenbelt required to meet housing demand;
- selecting sites that were located close to town centres and public transport hubs;
- selecting sites that had the potential to generate sufficient developer investment and travel demand to support delivery of new viable sustainable travel options.

PfE: The Existing Land Supply and Transport Technical Note

- 14.5** The Existing Land Supply and Transport Technical Note concluded the majority of new housing or office development will come forward in areas that are already well-served by public transport, which means that these sites will be relatively easily accommodated into the existing transport network.
- 14.6** The report finds that the more dispersed nature of industry and warehousing, including logistics and distribution locations, that seek large economically competitive locations close to the motorway network, is to be expected. The degree of public transport accessibility of these sites varies, and in some locations a more innovative approach to public transport provision may be needed.
- 14.7** Transport interventions proposed through the 2040 Transport Strategy Five Year Transport Delivery Plan are broadly consistent with the pattern of potential future development – and there is a clear vision for improving transport within each key growth cluster.

PfE Plan: Allocation Transport Locality Assessments

- 14.8** A series of Allocation Transport Locality Assessments have been prepared for the proposed PfE Plan Allocations to ensure that each allocation has been subject to a thorough, robust and consistent evaluation of likely transport impacts. The assessments verified that the allocations can be brought forward and operate effectively within the context of the wider transport network.
- 14.9** All of the allocations in the PfE Plan have been found to be suitable from a transport perspective subject to necessary mitigations, and satisfy the requirements of National Planning Policy Framework in that they are not expected to have a severe impact on the network.
- 14.10** The findings of the Allocation Transport Locality Assessments have been used to inform each Allocation Policy. However, it will be important for every site to be subject to a detail Transport Assessment at the time of any future planning application to revise and refine the final interventions needed.
- 14.11** For some allocations there is further work to be done to develop a solution that fully mitigates the site's impact on the transport network; however, it is clear from the assessments that the impact of allocations is unlikely to be severe. In those instances where further work is recommended, care has been taken to ensure that the allocation is not identified for delivery in the first five years of the PfE plan period, to enable more work to be undertaken to ensure that the site can be delivered in a safe and sustainable manner.

PfE Plan: Allocations Strategic Modelling Technical Note

- 14.12** The report identifies that the addition of the PfE Plan allocations to the existing land supply will present transport challenges that need to be planned for. The overall forecasts for congestion, crowding and emissions that are evident at the strategic level show that there is a deterioration after the identified interventions are included. However, the results in the Strategic Modelling Technical Note do not include the representation of any transport interventions over and above already committed and funded interventions, nor the introduction of the policy proposals and mode shift proposals set out in TfGM's 2040 Transport Strategy.
- 14.13** The precautionary approach taken means that the levels of congestion and delay reported in the model are considered to be a worst case. The model outputs demonstrate that even in our "policy-off" forecast the network continues to function – albeit with some increases in delay – and, as a result, the PfE Plan is not considered to have a severe strategic impact on the transport network. In addition, the implementation of the 2040 Transport Strategy will greatly improve the overall effectiveness of the transport network through planned investment in integrated transport solutions.

Stockport Metropolitan Borough Council

- 14.14** Following the departure of Stockport MBC from the joint plan a revised model run was commissioned, excluding Stockport's allocations and any associated interventions but retaining the existing land supply data. The full model continues to include the highway network in Stockport, to ensure National Highways understand the impact of growth on this part of the SRN.
- 14.15** Additionally approaches have been made to Stockport to continue collaborative work in relation to site specific transport evidence.

Strategic Road Network and National Highways Duty to Co-operate Comments

- 14.16** National Highways is a duty to do-operate body and is responsible for operating, maintaining and improving the SRN in England.
- 14.17** National Highways have been engaged with the preparation of the Places for Everyone Plan from early stages and in response to the 2016 GMSF raised concerns that the emerging Plan did not have a transport evidence base to support the significant growth aspirations.
- 14.18** Since that point the transport evidence has been gathered and National Highways have taken part in early workshops run to understand issues that need to be addressed in the 2040 Transport Strategy Delivery Plan to support the then GMSF (Transport Study Part 1: Understanding the Issues) and responded with comments to the Study Area Workshop Issues Paper. They also responded to the Transport Evidence Base - Phase 1, Transport Study Part 2: Addressing the Issues and Interim Strategic Modelling Report.

- 14.19** At the 2019 Revised Draft GMSF stage National Highways made a number of detailed comments relating to policies and allocations which may impact on the SRN. One of the key comments was insufficient transport evidence had been provided at this stage and this meant National Highways 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.
- 14.20** Since these comments have been made, significant and substantial further transport evidence has been prepared to answer the question of the impact of proposed growth set out in the PfE on the SRN. This evidence is detailed above and summarised in the Transport Topic Paper and much of this has been shared with National Highways 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 National Highways. This is investigating the cumulative PfE impacts on the SRN mainline links.
- 14.21** National Highways have confirmed in a letter dated 17th June 2021 and shown in Appendix 3, 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 iteration of PfE.
- 14.22** They confirm their commitment to ongoing collaboration with the GMCA, the nine Greater Manchester districts, Transport for Greater Manchester and partners to deliver the PfE. They will continue to do this through the existing general Memorandum of Understanding that has been in place for the last five years with the TfGM.
- 14.23** They state "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."
- 14.24** National Highways confirm they are working with TfGM and the GMCA to examine the potential impacts of the plan on the SRN.

Rail Network

14.25 The Greater Manchester Transport Delivery Plan 2021-2026 provides an update on rail infrastructure delivery commitments including the Castlefield Corridor, Transpennine Route Upgrade to Leeds and "Access for All" station improvements. It identifies the priorities for the next five years including reform of the rail network and rail prospectus priorities including stations. As part of this a Rail Freight Study will feed into the Delivery Plan. Longer term plans for rail include rail capacity improvements on key commuting corridors across GM, platform lengthening and increased electrification, including from Bolton to Wigan, HS2, additional platforms at Manchester Piccadilly and Northern Powerhouse Rail.

Duty to Co-operate Comments PfE Publication Consultation

14.26 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."

14.27 National Highways' Regulation 19 Representation (October 2021) concluded that at that time:

- "the basic fundamental question of 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 PfE is yet to be answered; which is essential to ensure that the:
 - Function of the SRN is not compromised; i.e. the primary function of the SRN is to facilitate the safe and efficient movement of goods and people; and the identification of specific appropriate and proportionate highway mitigation measures necessary to facilitate sustainable growth through a safe and efficient highway network."

14.28 It was acknowledged that there is ongoing work to enhance the transport evidence base in the form of the additional TfGM / Systra study, known as the 'Highways England Future Work Programme'. It was also recommended that National Highways continue to engage in a collaborative and proactive manner with TfGM & Systra to ensure the successful completion of this work, as this is of critical importance to the full evidence base.

14.29 In a meeting on 2 February 2022 National Highways noted that the duty to cooperate requirements had been met throughout the GMSF/PfE process.

PfE Statement of Common Ground 11

Connected Places

1. 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.

2. Since the October 2021 Regulation 19 Representation, National Highways, TfGM / Systra and the nine authorities have continued to engage in a collaborative and proactive manner to ensure the successful completion of the Future Work Programme.

Current Position

3. Since National Highways October 2021 Regulation 19 Representation, the following additional evidence in support of the PfE has now been provided to National Highways:

a) Information on traffic flows forecast by the strategic model, namely the SRN Workstream Modelling Methodology Report and a link flow spreadsheet illustrating a comparison between base model flows and actual flows on every SRN link.

b) As part of the Future Work Programme, several meetings have been held throughout to explain the methods used and the evidence emerging from the work.

c) Locality Assessments and addendums which set out the impact of the PfE at SRN junctions (provided to National Highways as part of the Regulation 19 consultation) were followed up with the detailed local junction modelling supporting this analysis (provided to National Highways for review on 5th October 2021).

d) Initial outputs from the Future Work Programme including a summary sheet identifying key impacts of the PfE on the SRN mainline and slip roads; and the merge and diverge assessments supporting these conclusions.

e) Ten reports setting out the PfE development assumptions and identified issues on a corridor basis across the SRN in Greater Manchester as submitted to National Highways Route Strategy RIS3 evidence gathering process.

4. As part of the SRN Future Work Programme – Final Technical Report, an initial delivery plan of short, medium, and long-term measures required on the SRN in support of the PfE will be identified based upon the existing evidence base. In addition, further engagement required to be undertaken in key areas in partnership with relevant stakeholders will also be identified.

5. Examples of engagement include the following emerging and ongoing workstreams which will contribute to the ongoing PfE evidence relating to the SRN:

- Northern Gateway Transport & Highways Group.
- WGIS Transport Workgroup.
- A576 Corridor Study Brief.
- Manchester Airport / HS2 Transport Workgroup.
- Manchester North West Quadrant Study
- M60 SE Junction Improvement Study

6. The SRN Future Work Programme - Final Technical Report is currently being finalised by TfGM & SYSTRA and will be made available for National Highways to review once complete. This is currently estimated to be by the end February 2022.

7. There are instances where proposed PfE Allocations have already come forward into planning in advance of PfE examination and adoption.

Next Steps

8. There is an agreed approach and commitment to deliver the ongoing evidence base preparation. Collaboration has been ongoing between National Highways and the PfE districts since the early stages of the GMSF/PfE preparation. This has resulted in significant discussion around transport matters and evidence sharing by the PfE districts and comments by National Highways. The PfE districts have sought to involve National Highways to gain their input to strengthen the PfE evidence base and plan and this approach will continue with National Highways when the SRN Future Work Programme – Final Technical Report (and Supporting technical information) is available for review. At this point, it is expected all parties including National Highways will review whether further collaborative work is required in advance of the EIP.

9. The form and nature of National Highways representation to the PfE Examination in Public Hearing Sessions will be discussed with TfGM/PfE districts once National Highways has reviewed the available transport evidence base work, in order to provide a clear and transparent representation of National Highways position at the PfE Examination. The PfE districts will also consider National Highways position and the findings of this further work and consider how to progress this collaboratively with National Highways through the plan making process.

10. All parties will continue to work together collaboratively post submission of PfE Submission Draft to the Secretary of State to ensure continuous engagement as evidence gathering and preparation takes place.

Neighbouring Authorities

14.30 Transport is a key duty to co-operate cross boundary issue. A number of neighbouring authorities have raised transport concerns, relating to:

- Impact of growth in the PfE on commuting patterns

- Impact of allocations on key transport routes
- Impact of growth on rail and bus provision and improved connections between neighbouring areas and PfE area

14.31 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 PfE transport evidence. Subsequent to these meetings and following the decision by the nine PfE districts to proceed with a joint plan, a further invite was sent to all offering to meet to update them on the PfE, its evidence and its relationship to the GMSF 2020.

14.32 Attendees at the September 2020 meetings 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.

14.33 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.

14.34 The allocations in the key growth corridors have required transport improvements to complement growth and these are set out below.

North East Growth Corridor

- 14.35** This is focused on the M62 corridor from junction 18 (the confluence with the M60 and M66) to junction 21 (Milnrow), extending across parts of Bury, Rochdale and Oldham. Works to improve the capacity of Simister Island (the junction of the M62, M60 and M66 motorways) are already planned, but additional investment in the motorway network will be required to support the scale of development proposed within the North-East Growth corridor, including improvements to Junctions 3 of the M66. The area may also be the subject of proposals to improve the performance of the whole length of the M62/M60 through Greater Manchester.
- 14.36** Major public transport improvements will be required to ensure that surrounding communities can take advantage of the new jobs, and new residents can access key locations such as the City Centre, nearby main town centres and key employment locations. Improvements to the Calder Valley Line have received commitments to be delivered and the North-East Growth Corridor will also benefit from additional local bus services as well as proposed rapid bus transit to serve the new developments. Work is also on-going into the future development of Bus Rapid Transit connections from the North-East Growth Corridor and surrounding towns to the City Centre.
- 14.37** Consideration is being given to delivering infrastructure that will benefit the wider area, including options for tram-train operation along the route of the East Lancashire Rail line, alongside the Heritage Railway and options for a Metrolink or Bus Rapid Transit extension to Middleton.

Duty to Co-operate Comments

- 14.38** Rossendale and Lancashire County Council have previously raised concerns about increased congestion on the A56/M66 due to identifying Pilsworth for further economic development and the wider impact of the Northern Gateway sites.
- 14.39** Rossendale are seeking a rail link between Rawtenstall and Manchester via Ramsbottom – Bury and Heywood, called Valley City Link. They are exploring a tram-train connection with GM Metrolink at Bury/Buckley Wells or National Rail at Castleton South Junction. TfGM will need to liaise with Rossendale Borough Council and Lancashire County Council as work progresses on delivering this.
- 14.40** At the Duty to Co-operate meeting in September 2020 Rossendale raised concerns about whether the linkages between the Northern Gateway site and Rossendale have been recognised in terms of commuter flows, including along the M66. It was acknowledged there is a strong connection with the Northern Gateways 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.

Duty to Co-operate Comments PfE Publication Consultation

- 14.41** During PfE Publication consultation the West Yorkshire authorities, including West Yorkshire Combined Authority, Calderdale and Kirklees requested a meeting to discuss transport matters. As part of this collaborative work Kirklees requested further detailed outputs from the transport modelling on a number of cross boundary routes. This was provided and Kirklees confirmed this satisfied their concerns and no formal comments were submitted to the Plan.

Wigan-Bolton Growth Corridor

- 14.42** The M6 logistics hub in Wigan (extending into Warrington, St Helens and West Lancashire) provides a major cluster of warehousing and distribution activity with easy access to the Port of Liverpool via the M58. This growth corridor is focused around improved transport links. These include new roads and a Wigan to Bolton Quality Bus corridor and, the more intense use of the Wigan – Atherton – Manchester and the Wigan – Bolton – Manchester rail lines.
- 14.43** New road infrastructure will improve east-west connectivity between junction 26 of the M6 (which is also the junction for the M58 motorway that provides a direct connection to the Port of Liverpool) and junction 5 of the M61. This transport infrastructure will significantly improve highway connections in the north-west of Greater Manchester, and better integrate the strong logistics functions along the M6 and M61 into the wider city region, as well as helping to address local congestion issues.
- 14.44** The increased use of the existing rail lines could include conversion to tram-train use on the Atherton line and electrification on the Bolton line. This would increase capacity and, along the Atherton line, has the potential to increase the number of stations.

Duty to Co-operate Comments since 2019

- 14.45** Lancashire County Council has raised the issue of the upgrade and electrification of the railway linking Manchester, Bolton and Preston. They wish to work with TfGM regarding the growth in demand on this line to ensure there is capacity on the railway and trains.
- 14.46** Blackburn with Darwen have raised concerns about the need for improved rail connections into Greater Manchester and especially Manchester Airport. They raised the possibility for a joint approach between TfGM and Blackburn with Darwen over the A666 upgrade.

- 14.47** At the September 2020 Duty to Co-operate meeting Lancashire County Council stated they are exploring the possibility of connecting 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. This point was reiterated by West Lancashire BC in comments to the Publication PfE 2021.
- 14.48** Lancashire County Council have also 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 PfE growth near the Chorley corridor could have a significant increase on railway demand, with new trains being over-capacity.

Duty to Co-operate Comments PfE Publication Consultation

- 14.49** St. Helens made comments to the Publication PfE reiterating the need for continuing cross boundary collaboration on sites as they come forward along the M6 Logistics Hub, in Wigan and St. Helens. They are seeking continued collaboration between relevant parties to mitigate the impact on J23 of the M6. A meeting in November 2021 confirmed the commitment between the two authorities to work together on this matter. This collaborative work will also need to include TfGM and National Highways, when required.
- 14.50** West Lancashire Borough Council acknowledged and welcomed the references to the Skelmersdale Rail Link in this Statement of Common Ground and also in the GM Transport Strategy 2040, however, they would welcome a reference to the Skelmersdale Rail Link in the justification text of PfE Plan. The PfE districts and TfGM are committed to joint working with West Lancashire to resolve this matter.

Sustaining Southern Competitiveness

- 14.51** Significant levels of transport investment are planned for the southern areas of Greater Manchester. The completion of HS2, new HS2 Stations and Northern Powerhouse Rail, extension of Metrolink will ensure the City Centre and Manchester Airport will be amongst the best-connected locations in the country.
- 14.52** The southern areas benefit from their proximity to prosperous locations just outside Greater Manchester, such as Cheshire East and Warrington, and taking opportunities to increase further the economic and functional connections between these areas supports their mutual success. Given the proximity of development outside the GM boundary to the south, the need to work with our partners to coordinate major development close to the boundaries of Places for Everyone.

Duty to Co-operate Comments

- 14.53** Previously Cheshire East raised comments about the growth planned in the Southern Competitiveness area on the A34. Cheshire East request the SEMMMs study should be refreshed and Stockport MBC agreed with this and led on the update with involvement from Cheshire East. The majority of the interventions relate to the Stockport Council area within Greater Manchester and they are no longer part of the PfE plan. Therefore the key cross boundary transport issues remaining of note to Cheshire East relate to the area around Manchester Airport.
- 14.54** Derbyshire County Council and High Peak Borough Council have also raised concerns about the growth ambitions around employment in PfE driving demand for housing in High Peak and increasing commuting on the A57 and A628. High Peak were also engaged in the SEMMMs refresh led by Stockport MBC.

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Cross Boundary Transport

Neighbouring authorities: Blackburn with Darwen Borough Council, Calderdale Council, Cheshire East Council, Chorley 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, Stockport Metropolitan Borough Council, Warrington Borough Council, West Lancashire Council and West Yorkshire Combined Authority agree that the evidence listed above and in particular the:

- PfE Existing Land Supply and Transport Technical Note
- PfE Plan: Allocation Transport Locality Assessments
- PfE Plan: Allocations Strategic Modelling Technical Note

provides the evidence showing that the Places for Everyone Plan builds in capacity for growth across the transport network through transport interventions planned in the Transport Strategy 2040 and the accompanying Delivery Plans and the SRN work programme. The modelling was based on the worst case scenario and indicate the impact on the transport network is not considered severe. Further interventions through the implementation of the strategies outlined above, including the Right Mix Technical Note, should increase sustainable travel modes and deliver growth supporting sustainable patterns of growth. The evidence above informs the policies throughout the Plan, especially:

- The strategic growth areas - North East Growth Corridor, Wigan-Bolton Growth Corridor, Sustaining Southern Competitiveness;
- Allocation's and their associated transport interventions; and
- The Connected Places chapter.

It also enables neighbouring authorities (listed above) to fully consider the impact of growth proposed in the Places for Everyone Plan and provide the basis for continued working.

The studies, strategies and delivery plans also provides information on the planned investment in transport across the PfE Plan and mitigation measures proposed for each allocation. It informs neighbouring authorities and of all the proposed transport schemes from walking, cycling, rail, bus, tram/train, HS2, highways improvements in the short, medium and long-term. This provides a basis for continued collaborative working between the PfE districts, TfGM and neighbouring authorities on transport improvements, delivery and implementation within the PfE Plan and across boundaries.

The preparation of Connected Places and allocations in PfE meets the requirements of duty to co-operate with neighbouring authorities.

Manchester Airport

- 14.55** The provision of a new HS2 station with journey times to London of just over an hour, and the planned Northern Powerhouse rail network will significantly improve connectivity to the airport and reduce journey times. Journeys to the Airport will also be enhanced by the completion of the Metrolink Western Leg and proposed Rapid Bus Transit service(s) along new spine roads linking development in Timperley Wedge and Medipark into the existing urban areas of Altrincham and Wythenshawe.

Duty to Co-operate Comments

- 14.56** 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. The PfE authorities will seek to work with Transport for Greater Manchester, Cheshire East and Stockport Council to deliver cross-boundary transport network improvements including, if necessary, those within the refreshed South East Manchester Multi Modal Strategy which fall within the PfE boundary regarding rail, Bus Rapid Transport, and local buses.

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Manchester Airport

Ongoing collaboration between Manchester City Council, Trafford Council, Stockport Council, Manchester Airport Group, Transport for Greater Manchester, and where relevant Cheshire East Council and National Highways, will continue examining the impacts and mitigation for HS2, Places for Everyone, Manchester Airport Growth and multimodal solutions, including on the M56 and SRN. With respect to the following allocations, JPA3.1 Medipark and JPA3.2 Timperley Wedge, it is agreed that further investigations will be undertaken to consider the necessary highways mitigation required for the proposed development, building on the Transport Locality Assessments. This will need to take account of existing highways commitments incumbent on the Airport and of the further identification of the impacts of and mitigation for HS2, Places for Everyone, Manchester Airport growth and other developments in the wider area in Stockport and Cheshire East that will require multimodal solutions including on the M56 and SRN.

15 Delivering the Plan

Infrastructure Implementation

- 15.1** To ensure effective infrastructure implementation, the strategic plan making authorities - Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan - infrastructure providers, national government, regulators and others involved in infrastructure planning and funding will work together, to ensure the effective development and implementation of the infrastructure needed to support the delivery of the vision and objectives set out in the PfE.

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Infrastructure Implementation

The PfE districts and TfGM are committed to ongoing collaboration with the main infrastructure providers, on the delivery and implementation of the PfE such as: health providers, National Highways, Network Rail, United Utilities, the Environment Agency, Cadent, and digital/telecommunication providers.

Appendix 1: Table showing Approval for the Joint Plan

- 1 The following table sets out the date on which each GM local authority approved a change to its constitution and delegating authority to AGMA and a Joint Committee to prepare the GMSF.

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 1.1 GM Local Authority Constitution Change

- 2 Below are the approval dates for each stage of the Plan and the relevant Committee

Plan Stage	Committee	Date
Objectively Assessed Development Needs	AGMA Executive	14th November 2014
Vision, Strategy and Strategic Growth Options	Joint AGMA/GMCA Executive Board	30th October 2015
Draft Greater Manchester Spatial Framework	Joint AGMA/GMCA Executive Board	28th October 2016
Greater Manchester's Plan for Homes, Jobs and the Environment: Revised Draft of the Greater Manchester Spatial Framework	Joint AGMA/GMCA Executive Board	11th January 2019
Greater Manchester's Plan for Homes, Jobs and the Environment: Publication draft 2020	Joint AGMA/GMCA Executive Board	30th October 2020

Plan Stage	Committee	Date
Places for Everyone: Publication Plan	Joint Committee of the Nine	20th July 2021

Table 1.2 Plan Stage and Approval

- 3 Following each stage above the Plan was taken through the relevant GM districts committee cycle.
- 4 Following consideration of 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 votes 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.
- 5 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. The Table below shows the approval route for the Publication PfE and the various committee meetings from the Joint Committee to district committees.

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

Table 1.3 Publication & Submission PfE Approval Route

Appendix 2: Greater Manchester Combined Authority Boards and Committees

- 1 This section of the document expands upon the GMCA governance.

GMCA/AGMA Executive Board

- 2 The Greater Manchester Combined Authority is the key decision making Committee. As required, a joint GMCA/ AGMA committee is concurrently run, allowing decisions which have their delivery under different bodies and functions to be made in one place. This board deals with the GMSF. Membership is made up of the Mayor and Leaders of each of the ten Greater Manchester Districts. Members from other sub-committees attend, including Transport for Greater Manchester Committee. All decisions not delegated to other Committees are made at the GMCA and AGMA Executive Board.

Joint Committee of the Nine

- 3 Following the departure of Stockport MBC from the joint plan making process, a meeting was held between the remaining districts on 11th December 2020 and at this meeting they agreed in principle to producing a joint DPD. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts. This has replaced the GMCA/AGMA Board as the key decision making committee for the PfE. Membership is made up of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan

Transport for Greater Manchester Committee

- 4 The Greater Manchester Transport Committee (GMTC) is a joint committee made-up of the principal transport decision-making bodies – the ten GM Councils, the Greater Manchester Combined Authority (GMCA) and the Mayor of Greater Manchester.
- 5 Transport for Greater Manchester Committee (TFGMC) minutes go to the GMCA to be considered and, where necessary, approve the recommendations. It will oversee the performance of the transport system and hold rail, tram, and bus operators, TfGM, and highways authorities to account. This effectively allows the Committee to act in an advisory capacity to the Mayor and the GMCA, through the Mayor's Transport Board.

Transport for the North

- 6 Transport for the North (TfN) is the first sub-regional transport body in the UK. GMCA appoints one member to TfN. As a statutory body, TfN's powers include the ability to produce a statutory transport strategy, fund organisations to deliver transport projects, consultation on all rail franchises in the North and smart ticketing on public transport.

Scrutiny

- 7 Scrutiny of all the above Boards, Committees etc. is offered by scrutiny committees. The GMSF is, in the main, picked up by one scrutiny committee:
- Housing, Planning and Environment Overview and Scrutiny Committee

Local Enterprise Partnership

- 8 The GMCA works in partnership with the GM Local Enterprise Partnership (LEP) to deliver joint strategic priorities in the Greater Manchester Strategy. The remit of the LEP is to empower business leaders to set strategies and economic priorities to drive growth and job creation. GMCA's Wider Leadership Team (WLT) are advisors to the LEP.
- 9 Decisions of the GM LEP are reported via a copy of the draft minutes, to the next GMCA meeting. These papers are publicly available. Decisions taken using delegated authority are reported back to the full GM LEP board the following month.

Greater Manchester Planning & Housing Commission

- 10 The Planning & Housing Commission 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 by the GMCA/AGMA and other GM strategic bodies. It provides advice on strategic planning and housing issues. It engages with Government and a range of delivery partners to develop and oversee programs at the GM scale.
- 11 Membership includes the GM Portfolio holder for Planning, Housing and Homelessness, a representative of the GM Housing CEO's Group and a representative from infrastructure providers - United Utilities. The Commission identifies and appoints its own advisors and current advisors include Homes England and The Environment Agency. The Commission reports to the GMCA/AGMA Executive Board through its Chair and the lead Chief Executive for Planning and Housing.

Greater Manchester Green City Partnership

- 12 The Partnership is responsible, on behalf of the GMCA, for overseeing the monitoring and delivery arrangements for the Greater Manchester 5 Year Environment Plan, as part of Priority 7 'Green City Region' of the Greater Manchester Strategy. The Partnership will oversee delivery via a number of Challenge Groups, identifying individual tasks (Task and Finish Groups), synergies and gaps, then provision of appropriate advice to the GMCA on mitigation measures, including the development and delivery of future policies and strategies. Membership includes representation for the Natural Capital Group (Local Nature Partnership).

Strategic Infrastructure Board

- 13** The GMSIB brings together at a strategic level the main organisations responsible for managing and/or delivering Greater Manchester's critical physical infrastructure. The role of the Strategic Infrastructure Board is to:
- work strategically and holistically;
 - to take ownership of the Greater Manchester Infrastructure Framework;
 - to consider and respond to the issues and challenges that it raises;
 - to advise the GMCA and LEP on how best to move the challenges forward from the framework into an infrastructure programme.

Appendix 3: National Highways

- 1 See below National Highways letter confirming the process for continued working with the PfE districts, TfGM and GMCA.



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 3.1 Letter from Highways England Relating to PFE 17 June 2021

- 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 3.2 Letter from Highways England Relating to PfE 17 June 2021

Appendix 4: Signatures

List of Signatures

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

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 4.1


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 4.2

Calderdale Council

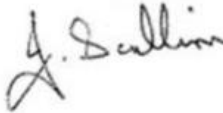
I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

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 4.3

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 4.4

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 4.5

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 4.6

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 4.7

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 4.8

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 4.9

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 4.10

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 4.11



Homes
England

Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU

By email: planningandhousing@greatermanchester-ca.gov.uk

Date: 01 October 2021

Dear Sir / Madam,

Places for Everyone Joint Development Plan Document – Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the Places for Everyone Consultation.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England Support for Plan-Making

Homes England would like to express its support for the efforts of the Greater Manchester Combined Authority (GMCA) in bringing forward a strategic framework that will be a key component in planning for the future needs of the Greater Manchester authorities covered by the Plan. Homes England supports plans to ensure that long term housing needs and economic growth ambitions are met.

With the exception of policies that affect Homes England's active land interests, we do not propose to comment on the content of specific policies contained within the Places for Everyone document. This is a matter for the GMCA and its local authority partners to determine based on appropriate and available evidence. However, the role of the Plan in providing a positive and robust framework to ensure that growth is co-ordinated, sustainable and resilient, is supported.

Homes England
1st Floor Churchgate House
56 Oxford Street
Manchester
M1 6EU

Please send all Local Plan and related consultations to
nwlocalplanconsultat@homesengland.gov.uk

0300 1234 500
www.gov.uk/homes-england

OFFICIAL

Page 99 of the Duty to Co-operate Statement and Log of Collaboration references Homes England response to the Revised Draft GMSF on 18th March 2019 and it states that 'Homes England support the GMSF'. Whilst we acknowledge that this is a summary, we would request that it is amended to better reflect the nature and content of our comments and suggest it reads as follows:

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. Homes England do not comment on the content or specific policies contained within the GMSF as these are matters for the GMCA to determine based on appropriate and available evidence'.

The Duty to Cooperate

The Places for Everyone Duty to Cooperate Statement and accompanying Statement of Common Ground set out how the GMCA has discharged its Duty to Cooperate obligations. The documents also reference the content of specific plan related policies and evidence. As explained above Homes England does not generally comment on the content of specific policies or Plans and therefore, we do not wish to be a signatory of the Statement of Common Ground. However, we 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.

Homes England Place-Based Working with GMCA

Homes England is supporting the delivery of new housing across England by actively working with Combined Authorities and Local Authorities to identify a pipeline of priority housing projects and by deploying our resources, advice and expertise to help unlock and deliver them at a local level.

In Greater Manchester, we actively work with GMCA and each of the local authorities through place-based partnership working. We do this by aligning our resources and skills to jointly identify and prioritise opportunities where we can support partners in bringing forward new homes. We will continue to work in partnership with GMCA and the local authorities to deliver their local housing needs and ambitions.

Homes England Land Ownership

Homes England has several land holdings within Greater Manchester including:

- Horwich Loco, Bolton
- East Lancashire Paper Mill, Bury
- Littleborough, Rochdale

Part of Homes England's site at Littleborough is covered by allocation Policy JP Allocation 22 - Land North of Smithy Bridge. Homes England does not wish to comment in detail on this policy at this stage, however, we can confirm Homes England's capacity to deliver housing in the area. For example, in March 2021, Homes England entered into a conditional contract for development of its wider Littleborough site with Vistry Partnerships, who have recently submitted a planning application for the development of 169 homes on the site.

Yours faithfully,

C.Moore

Carl Moore
Head of Cities and Major Conurbations

OFFICIAL

Picture 4.12

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Yours faithfully,

C.Moore

Carl Moore
Head of Cities and Major Conurbations

OFFICIAL

Picture 4.13

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 4.14

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 4.15

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 4.16


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

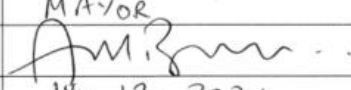
Picture 4.17

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 4.18

National Highways

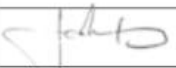
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I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

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 4.19

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.

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 4.20

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 4.21

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 4.22

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 4.23

1 Salford Clinical Commissioning Group

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 Dobrowolska
Position	Director of Corporate Services
Signature	
Date	21 September 2021

Table 1.1 Co-operation Statement

Picture 4.24

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 4.25

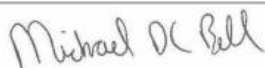
Warrington Council

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 4.26

West Lancashire Borough Council

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 4.27

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.

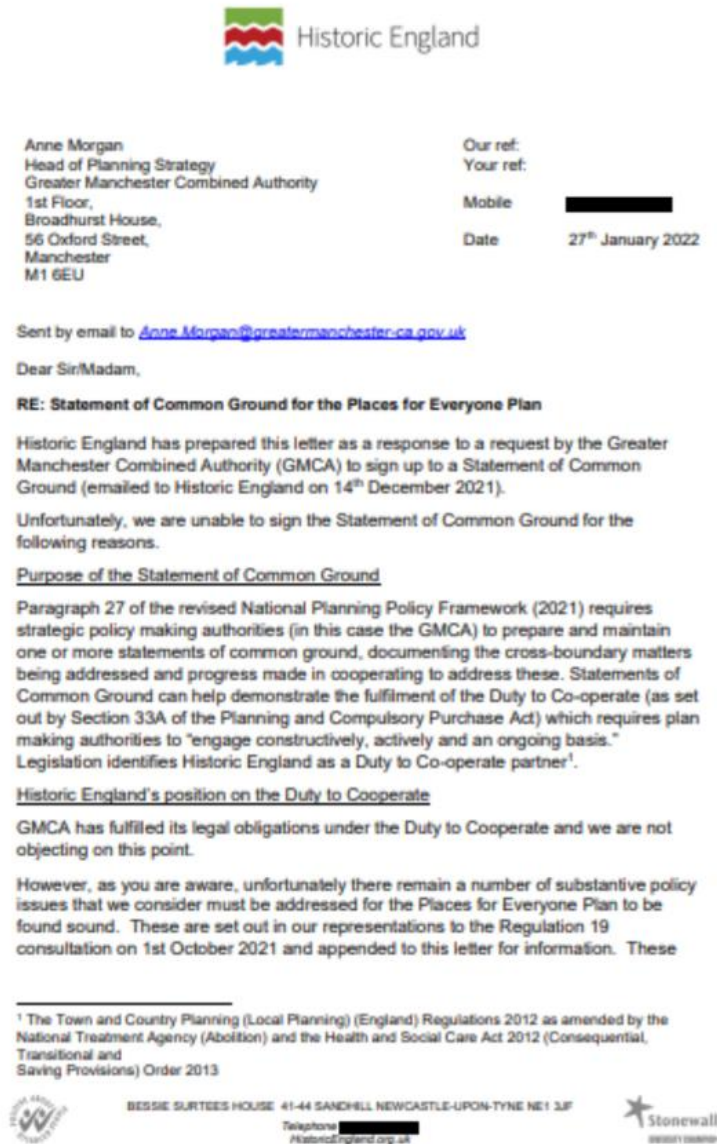
The relevant statements my authority is signing are set out below:

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 4.28



Picture 4.29 Historic England 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



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Picture 4.30