

**Manchester City Council
Report for Resolution**

Report to: Council – 6 October 2021

Subject: Places for Everyone Publication Plan 2021: A Joint Development Plan Document for Nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan)

Report of: Director of City Centre Growth & Infrastructure; and Director of Planning, Building Control and Licensing

Summary

This report seeks approval for the submission of the draft Places for Everyone Publication Plan (PfE) plan pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is expected that the plan will be submitted for examination in early 2022.

Recommendations

Council is recommended to approve submission of the Places for Everyone Publication Plan 2021 and supporting background documents to the Secretary of State for examination pursuant to Regulations 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Wards Affected - All

Environmental Impact Assessment - the impact of the decisions proposed in this report on achieving the zero-carbon target for the city

The PfE Publication Draft 2021 has undergone a final stage of consultation (9 August to 3 October) prior to its submission for examination next year. The consultation provided an opportunity for organisations and individuals to submit their final views on the content of the plan. The PfE includes objectives and policies that seek to achieve a zero carbon Greater Manchester by 2038. The PfE also covers a range of issues that will have a direct bearing on successfully meeting the zero carbon challenge by 2038.

| Our Manchester Strategy outcomes | Contribution to the strategy |
|--|---|
| <p>A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities</p> | <p>The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. If Greater Manchester is to flourish in the long run then it will need to make the most of its key assets and advantages, which can differentiate it from other places. The growth potential of a small number of locations that can boost international competitiveness will need to be maximised in order to support the prosperity of Greater Manchester as a whole.</p> |
| <p>A highly skilled city: world class and home grown talent sustaining the city's economic success</p> | <p>The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity.</p> |
| <p>A progressive and equitable city: making a positive contribution by unlocking the potential of our communities</p> | <p>The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity.</p> |
| <p>A liveable and low carbon city: a destination of choice to live, visit, work</p> | <p>The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. Objective 7 of the plan seeks to ensure that Greater Manchester is a more resilient and carbon neutral city-region.</p> |
| <p>A connected city: world class infrastructure and connectivity to drive growth</p> | <p>The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. Objective 6 of the plan promotes the sustainable movement of people, goods and information. Moreover, Objective 9 of the plan seeks to ensure access to physical and social infrastructure.</p> |

Full details are in the body of the report, along with any implications for

- Equal Opportunities Policy
 - Risk Management
 - Legal Considerations
-

Financial Consequences – Revenue

The preparation and examination of the Places for Everyone plan generates a revenue cost for the nine local authorities. A substantial evidence base has been assembled to support the plan which has involved commissioning of specialist and independent experts. The consultation on the draft PfE plan concluded on 3 October 2021. The intention is now to submit the draft plan to the Secretary of State for examination. There will be further revenue costs associated with the examination process, including appointment of a Programme Officer(s) and the cost of the examination itself, including procurement of a venue, Planning Inspectors and legal advice. Further reports will be provided to the Joint Committee (consisting of the nine local authorities the plan covers) and reported to the Executive as appropriate.

Financial Consequences – Capital

No capital costs are involved in this process.

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Background documents (available for public inspection):

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

PfE Documents

- Places for Everyone – Publication Plan (Appendix 2)
- Integrated Appraisal Habitats Regulations Appraisal (Appendix 3)
- Consultation report (incl SCI compliance) (Appendix 4)
- GM Strategic Housing Market Assessment
- Economic forecasting
- Employment Land Demand
- GMFM Landscape Character Assessment
- Biodiversity Net Gain
- Strategic Flood Risk Assessment level 2
- GMSF Strategic Viability Assessment
- GM allocations – Viability Assessment
- Carbon & Fracking
- Carbon & Energy Implementation
- Historic Environment
- Land supply data (housing and employment)
- Transport Locality Assessments
- Strategic Modelling Technical note
- Existing Land Supply Technical note

- Heritage/archaeological screening assessments
- Growth and Spatial Options
- Site Selection process
- Overall Green Belt Harm Assessment
- Statement of Common Ground
- District site specific evidence
 - Historic Environment Assessment - GMA11 Roundthorn Medipark Extension
 - Manchester GMSF Allocations: Viability and Deliverability Assessment - AG2 Roundthorn Medipark Extension

- Greater Manchester Transport Strategy 2040
- Our Five-Year Delivery Plan (2020-2025)
- Manchester Local Implementation Plan

1.0 Introduction

- 1.1 Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared, Greater Manchester's Plan for Jobs, Homes & the Environment (known as the "GMSF"). The GMSF was considered at the Council meeting on 25 November 2020 where agreement was given to submit the plan to the Secretary of State for independent examination at the end of the period for representations. The plan has been through a number of previous consultations including two earlier draft stages in 2016 and 2019.
- 1.2 The decision at Stockport Council's meeting on 3 December to not submit the GMSF 2020 to the Secretary of State for independent examination following the consultation period, and the subsequent resolution at its Cabinet meeting on 4 December not to publish the GMSF 2020 for consultation, in effect signalled the end of the GMSF as a joint plan of the 10.
- 1.3 Section 28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has "substantially the same effect" on the remaining authorities as the original joint plan
- 1.4 Consequently, at its meeting on the 11th December 2020, members of the AGMA Executive Committee asked officers to report back on the implications and process of producing a joint DPD of the nine remaining Greater Manchester (GM) districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). One of the key issues that officers were asked to explore was the extent to which the joint Places for Everyone plan could take advantage of the provisions set out in paragraph 1.3 above, and proceed to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Publication stage rather than have to go back to an earlier (Regulation 18) informal stage of consultation.
- 1.5 At the AGMA Executive Board meeting on 12 February 2021, a report was considered setting out the merits of continuing to produce a joint plan of the nine remaining GM districts, to be known as "Places for Everyone" (PfE). The report highlighted that producing such a plan would enable those nine districts to continue to:
 - progress the strategic policies in GMSF 2020, for example net zero carbon development, affordable housing and space and accessibility standards for new housing;
 - maximise the use of sustainable urban/brownfield land and limit the need for Green Belt to accommodate the development needs of the nine;
 - align with wider Greater Manchester strategies for transport and other infrastructure investment;
 - utilise the evidence base already commissioned and completed, minimising the cost of producing further evidence; and

- spread the cost jointly of the independent examination
- 1.6 At the meeting, it was noted that each district would be asked to approve the making of an agreement with each other to prepare a joint Development Plan Document. Subsequently, each of the nine districts have sought approval to establish a Joint Committee and to delegate the formulation and preparation of a joint Development Plan Document to the Joint Committee (agreed at Executive meeting on 17 March 2021).
- 1.7 On 28 July 2021 the Executive was asked to approve the publication of PfE pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation commenced on 9 August 2021 and closed on 3 October 2021. A post-consultation report will now be prepared with the intention that the plan and supporting documents will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities. This has already taken place in the other eight local authorities and this report seeks the approval for the submission of the PfE pursuant to Regulations 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2.0 Background

PLACES FOR EVERYONE AND MANCHESTER LOCAL PLAN

- 2.1 PfE2021 is key to create the foundations for the scale of growth and ambition across our boroughs. It has been developed through a number of iterations to reach this point. It will be part of the Development Plan for each participating local authority, but it is a high level, strategic plan and does not cover everything that a district local plan would. Appendix 5 sets out the policies in Manchester's Core Strategy, adopted in 2012, which will be replaced by the PfE2021. The PfE plan has been developed with extensive input from Manchester and aligns with and supports local policies and objectives. Nevertheless, local plans will continue to be important to take forward the PfE2021 strategic policies and interpret these at a more detailed local level to support the creation of locally distinctive high quality places/neighbourhoods. Following adoption of the PfE2021, each district will be updating their own local plans.
- 2.2 The process of updating the local plan in Manchester is already underway. A consultation on the key issues to include in the local plan was undertaken in 2020. Work has continued since then to develop the emerging local plan with a view to undertaking a consultation on a "preferred policy directions" document. The consultation on the "preferred policy directions" has been set to follow the consultation on the PfE2021 to avoid confusion with respect to the two plans being consulted upon at the same time. The intention is for the local plan to be adopted in 2023, following the adoption of PfE2021.

2.3 The PfE2021 plan includes specific policies and allocations that directly relate to Manchester including:

- Delivery of a minimum of around 56,500 new homes; and over 2.3 million square metres of office floorspace in Manchester by 2037;
- Policies to deliver growth and regeneration across the City
- Seeking to achieve a carbon neutral city no later than 2038;
- Policies across a range of other themes including flood risk, water resources, air quality, economic and housing matters, heritage, culture, education and skills, health, and sport and recreation; and
- Specific allocations identified in the plan for Manchester for new jobs at the airport and Wythenshawe Hospital.

The former GMSF plan also included a proposed allocation for housing at Southwick Park. The allocation has been removed from the PfE2021 as a result of further work on Manchester's land supply following the revised local housing need figure published in December 2020.

2.4 The Joint Committee has considered the differences between Places for Everyone 2021 and GMSF 2020 in sections 2 and 3 of the report considered on 20 July 2021 (see Appendix 1) The conclusions drawn out in the report to the Joint Committee at paragraphs 3.4 and 3.5 state:

“3.4 As set out above, the resultant impact of the changes on the overall strategy of the joint plan and its effect on the remaining nine districts is limited.

3.5 On this basis, officers have concluded that the PfE2021 has substantially the same effect on the 9 boroughs as the GMSF 2020 and recommend that the plan proceed to a Publication stage (Regulation 19) consultation.”

3.0 PLACES FOR EVERYONE PUBLICATION PLAN 2021

3.1 The PfE2021 provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes, protect, and enhance the natural environment. The Plan is not being prepared in isolation. It is supported by the Transport 2040 Delivery Plan, which will outline the interventions required to achieve the transport vision for the city region and is one of a suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside the Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital and Cultural Strategies.

3.2 This is a plan for sustainable growth in the nine boroughs, it;

- sets out how they should develop up to the year 2037,
- identifies the amount of new development that will come forward in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused,

- identifies the important environmental assets which will be protected and enhanced,
- allocates sites for employment and housing required outside of the urban area,
- supports the delivery of key infrastructure, such as transport and utilities,
- defines a new Green Belt boundary for the nine boroughs.

3.3 The vision is for a Greater Manchester which emerges from the pandemic a more resilient and better city-region. The impact of Covid 19 on people's lives and wellbeing as well on our economy and communities is not yet known but will be severe. There is an opportunity to capture some of the changes, for example the on the increase in cycling and walking and the acceleration in flexible working that we have seen over the recent months, and harness this to cement the benefits for our towns and cities. Greater Manchester needs to be a place where all of the people can access the services they require through high quality digital communications and where town and city centres can respond to the decline in their traditional retail role in positive ways. One of the biggest lessons of the pandemic is the importance of good quality greenspace close to where people live. This is particularly important in densely populated and deprived neighbourhoods.

Spatial Strategy

- 3.4 The spatial strategy seeks to deliver sustainable, inclusive growth. It has three key spatial elements;
- Significant growth in jobs and housing at the core – continuing development in the 'core growth area' encompassing the city centre and beyond to the Etihad in the east, through to the Quays, Trafford Park and Port Salford in the west. The majority of commercial employment growth is proposed in this area and over 50% of overall housing supply is found here and in the wards immediately surrounding it.
 - Boosting the competitiveness of the northern districts – provision of significant new employment opportunities and supporting infrastructure and a commitment that collectively the northern districts meet their own local housing need.
 - Sustaining the competitiveness of the southern districts – supporting key economic drivers, for example around Wythenshawe hospital and the Airport, realising the opportunities offered by national infrastructure investment, e.g. HS2, whilst recognising the important green infrastructure assets in the area.

Jobs

3.5 Economic prosperity is central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities. In the face of the uncertainty wrought by Covid 19, there will be a need to continue to invest in the city and town centres to drive our recovery. We need to continue to develop our Research and Development capabilities underpinned by our

excellent academic institutions as well as investing in strengthening existing, and creating new, employment locations so that all communities are able to contribute to, and benefit from, growth.

- 3.6 The Greater Manchester Independent Prosperity Review: One Year on 2020 indicated that Greater Manchester was the most economically diverse city region economy with world-class strengths in advanced materials and health innovation. Yet the Prosperity Review also acknowledged that for two decades Greater Manchester's productivity consistently remained at 90% of UK level and a year on this gap persists.
- 3.7 There is a growing body of evidence that the worst effects of the COVID-19 pandemic have amplified pre-existing patterns of not only health, but also economic inequality. This gap is linked to economic inequality with overall pay levels and salary growth in Greater Manchester lagging behind UK averages. The growth in employment in low productivity sectors witnessed in Greater Manchester over the last decade further explains this, as these sectors are likely to pay lower wages and invest in lower value business models which perpetuate the challenges. Furthermore, it is in these sectors of the foundational economy (retail, hospitality and leisure) in which employees have tended to be hardest hit during the COVID-19 crisis.
- 3.8 Growing inequalities have a major impact on quality of life for Greater Manchester residents such as the ability to afford decent housing, good quality food and services. As emergency support schemes from government are withdrawn, a greater focus is needed to support businesses in the foundational economy in a Greater Manchester has the opportunity to lead with the 'levelling up' agenda helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole. This Plan supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the even longer-term. However, delivering these high levels of growth means that Greater Manchester will need to continue to invest in the sites and critical infrastructure that will make it an even more attractive place for businesses to invest, bringing high-value, well paid jobs, to the city region; invest in skills and business development to support the foundational economy, and promote the continued progress towards a low-carbon economy.
- 3.9 In pursuit of this, the plan sets a target of at least 1,900,000 sq.m. of new office floorspace and at least 3,330,000 sq.m. of industrial and warehousing floorspace across Greater Manchester over the plan period.

Homes

- 3.10 Greater Manchester is facing a housing crisis and the impact of Covid 19, with potential increases in unemployment will exacerbate this. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To address the supply side Government has

introduced a standard methodology for calculating local housing needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.

- 3.11 Applying the current methodology means that around 10,300 (10,305) homes are required per annum, equating to just under 165,000 (164,880) new homes over the plan period. The plan supports Greater Manchester's commitment to deliver more affordable housing - 50,000 units over the plan period, including 30,000 for social or affordable rent.

Environment

- 3.12 The Plan is not solely concerned with accommodating development. It also includes a range of policies designed to protect and enhance the many and varied green spaces and features which are used in many different ways and afforded many different values by the people who live, work or visit the city-region.

- 3.13 The Plan supports the important role of our natural assets by:

- Taking a landscape scale approach to nature restoration;
- Seeking to protect and enhance our network of green and blue infrastructure;
- Seeking a significant overall enhancement of biodiversity and geodiversity; and;
- Seeking to maintain a new and defensible Green Belt which will endure beyond the plan period.

- 3.14 Furthermore, the plan supports wider strategies around clean air, walking and cycling and underpins Greater Manchester's ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 and to keep fossil fuels in the ground.

Brownfield land preference

- 3.15 There is a strong focus in the plan on directing new development towards sites within the existing urban area, which are often in sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in the urban area reduces the need to release greenfield and Green Belt land for development.

- 3.16 The land supply identified for development in the plan is largely within the urban area:

- Offices - 99%
- Industry and Warehousing- 47%
- Housing - 90%

- 3.17 There are significant viability issues in parts of the conurbation and there is a need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The recently announced Brownfield Housing Fund is targeted at Combined Authorities and begins to help to address viability issues but it is not enough to enable the full potential of our brownfield land supply to be realised.

Green Belt

- 3.18 The PfE 2021 Plan proposes a limited release of a Green Belt for both housing and employment. The net loss of Green Belt proposed is 1,754 hectares. This represents a significant reduction from the 4,371 hectares which were proposed for release by the nine PfE districts in the 2016 GMSF. This has been achieved through:

- Removing a number of sites;
- Reducing the extent of Green Belt release within sites and retaining more Green Belt within some sites; and
- Proposing a limited number of Green Belt additions

- 3.19 The proposals in the Plan would result in the overall extent of the nine PfE districts Green Belt reducing by 3.3%. The current Green Belt covers almost 47% of the land covered by the nine PfE districts the proposals in this Plan would reduce this by just under 2 % with over 45% (45.2%) of the PfE Plan remaining as designated Green Belt.

4.0 INTEGRATED ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT

- 4.1 As part of the development of the GMSF 2020, an Integrated Assessment (IA) was undertaken incorporating the requirements of:
- Sustainability Appraisal (SA): mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
 - Strategic Environmental Assessment (SEA): mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
 - Equality Impact Assessment (EqIA): required to be undertaken for plans, policies and strategies by the Equality Act 2010.
 - Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 4.2 The IA contributed to the development of the plan through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.
- 4.3 Given the conclusion in section 3 of the Joint Committee report (Appendix 1) that PfE 2021 has substantially the same effect as the GMSF 2020 would

have had on the nine districts enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations, 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” which is being assessed is one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. In view of this, the environmental assessments carried out at previous stages remain valid (including their scope). That said, addendum reports have been prepared to assess the impact of the changes between GMSF 2020 and PfE 2021 against the IA framework and these are available alongside the GMSF 2020 IA documentation.

- 4.4 A Habitats Regulations Assessment (HRA) refers to several distinct stages of Assessment which 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 protected features of a habitats site before deciding whether to undertake, permit or authorise it
- 4.5 All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. If a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an Appropriate Assessment of the implications for the site is required.
- 4.6 As was the case with GMSF, PfE2021 is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and has therefore been informed by an HRA with mitigation measures identified as appropriate.

5.0 EVIDENCE BASE

- 5.1 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. This evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA’s website since October 2020. This evidence base has been reviewed and updated in the light of the change to the PfE2021 and, where appropriate addendum reports have been produced.
- 5.2 One key supporting document is the Statement of Common Ground. This will set out the key matters between the nine authorities agreeing on the distribution and quantum of development contained in the Publication Plan. It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. There may be a need for additional Statements of Common Ground to deal with specific matters linked to the proposed site allocations and these will be the responsibility of the relevant local authority to draw up if required.

- 5.3 It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. The position between Stockport and the remaining 9 Greater Manchester authorities has evolved from December 2020 when all 10 were co-operating on the Greater Manchester Spatial Framework, to the more recent position where, in March 2021, the 9 remaining local authorities agreed to produce a joint plan (Places for Everyone) following the Stockport decision to withdraw from the joint plan to prepare its own local plan.
- 5.4 In the light of this it has been necessary to ‘reset’ the Duty to Co-operate arrangements. The outcome of the GMSF work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations to ensure that the overall Vision and Objectives of the Plan were met. 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. At this point in time, the 9 districts do not have an understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport’s assessment of it and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs. Duty to cooperate discussions with Stockport continue.
- 5.5. The PfE2021 and supporting documents can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>)

6.0 PREVIOUS CONSULTATION

- 6.1 Four consultations took place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.
- 6.2 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.
- 6.3 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it was proposed to proceed directly to Publication stage under

Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

6.4 At this stage, whilst anyone can make a representation on any point, only those pertaining to 'soundness' will be taken into account by the Inspector(s). The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. As set out in paragraph 35 of the National Planning Policy Framework, plans are sound if they are;

(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 19 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) Effective – deliverable over the plan period, 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; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

6.5 Inspectors also consider submissions concerning legal compliance issues, for example the Integrated Assessment, the Habitats Assessment Regulation and the Duty to Co-operate.

7.0 NEXT STEPS

7.1 The representations made in the Publication stage are sent to the Secretary of State – this is called the 'Submission stage', pursuant to Reg. 22 of the Local Planning Regulations. A post-consultation report will be now prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities. Whilst anyone can make a representation on any point, only those pertaining to the four tests of soundness will be taken into account by the Inspector(s). If major new issues arise at the Publication Consultation stage there would need to be further consultation prior to any submission of the plan.

7.2 An Examination in Public takes place at which a Planning Inspector will consider the joint DPD and representations made in respect of it and determine whether the DPD is capable of being adopted, either with or without amendments.

7.3 Assuming that the document is capable of adoption, whether with or without amendments, the ultimate decision to adopt must be taken by each of the Full Councils of the nine participating local authorities

8.0 Contributing to a Zero-Carbon City

- 8.1 The draft PfE plan includes objectives and policies that seek to achieve a zero carbon Greater Manchester by 2038. The draft plan also covers a range of issues that will have a direct bearing on successfully meeting the zero carbon challenge by 2038.

9.0 Contributing to the Our Manchester Strategy

(a) A thriving and sustainable city

- 9.1 The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. If Greater Manchester is to flourish in the long run then it will need to make the most of its key assets and advantages, which can differentiate it from other places. The growth potential of a small number of locations that can boost international competitiveness will need to be maximised in order to support the prosperity of Greater Manchester as a whole.

(b) A highly skilled city

- 9.2 The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity.

(c) A progressive and equitable city

- 9.3 The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the city region, with everyone sharing in the benefits of rising prosperity.

(d) A liveable and low carbon city

- 9.4 The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. Objective 7 of the plan seeks to ensure that Greater Manchester is a more resilient and carbon neutral city-region.

(e) A connected city

- 9.5 The draft PfE plan covers this outcome, both in the strategic policies and other specific thematic policies. Objective 6 of the plan promotes the sustainable movement of people, goods and information. Moreover, Objective 9 of the plan seeks to ensure access to physical and social infrastructure.

10.0 Key Policies and Considerations

(a) Equal Opportunities

- 10.1 The PfE is a statutory plan which seeks to contribute to the achievement of sustainable development, delivering economic, social and environmental benefits together in a mutually reinforcing way. It is informed by an Integrated Appraisal which includes an equalities assessment.

(b) Risk Management

- 10.2 Risks have been identified that could impact on the consultation timetable and potentially delay the PfE. The most obvious is any continued disruption as a result of Covid 19 either nationally or locally. Mitigation measures including local outbreak management plans will be in place and these will be taken into account as the plan progresses through the submission and examination stages.
- 10.3 The Government's initial proposals for the reform of the planning system including the development plan process was launched in August 2020. The changes proposed would require primary and secondary legislation which is not likely to commence until towards the end of 2021. Given the level of uncertainty around the timescales associated with planning reforms, it is not considered appropriate to delay further progress on the draft PfE plan at this time.

(c) Legal Considerations

- 10.4 The legislative and constitutional requirements for the preparation of a joint Development Plan Document (DPD) in the Planning and Compulsory Purchase Act 2004 ("2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("2012 Regulations") have been complied with.
- 10.5 The joint DPD will be submitted to the Secretary of State for independent examination (s20 of the 2004 Act) along with the documents prescribed by Regulation 22 of the 2012 Regulations.
- 10.6 If the draft joint DPD is not prepared in accordance with the 2004 Act and the 2012 Regulations, any subsequent attempt to adopt the plan would be susceptible to challenge.