GREATER MANCHESTER COMBINED AUTHORITY

DATE: Friday, 27th September, 2019  
TIME: 10.00 am  
VENUE: Bury Town Hall, Knowsley Street, Bury, BL9 0SW

SUPPLEMENTARY AGENDA

<table>
<thead>
<tr>
<th>8.</th>
<th>MINUTES OF THE GMCA STANDARDS COMMITTEE HELD ON 17 SEPTEMBER 2019</th>
<th>1 - 4</th>
</tr>
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<tbody>
<tr>
<td>To note the minutes of the GMCA Standards Committee meeting held on 17 September 2019.</td>
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<th>14.</th>
<th>PROGRAMME FOR CHANGE - GREATER MANCHESTER FIRE &amp; RESCUE SERVICE: PROPOSED AMENDMENTS TO OUTLINE BUSINESS CASE FOLLOWING ANALYSIS OF CONSULTATION</th>
<th>5 - 14</th>
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<td>Report of Andy Burnham, GM Mayor.</td>
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<th>15.</th>
<th>A BED EVERY NIGHT - PHASE 2</th>
<th>15 - 24</th>
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<td>Report of Andy Burnham, GM Mayor.</td>
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<th>19.</th>
<th>DECARBONISING GREATER MANCHESTER’S EXISTING BUILDINGS</th>
<th>25 - 72</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix 1 to the main report.</td>
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<tr>
<th>20.</th>
<th>GREATER MANCHESTER SPATIAL FRAMEWORK UPDATE</th>
<th>73 - 84</th>
</tr>
</thead>
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<td>Report of City Mayor, Paul Dennett, Portfolio Lead for Housing, Homelessness &amp; Infrastructure.</td>
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<th>21.</th>
<th>STOCKPORT MAYORAL DEVELOPMENT CORPORATION DELIVERY PLAN 2019 - 20</th>
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<td>Report of Andy Burnham, GM Mayor.</td>
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Report of Andy Burnham, GM Mayor.

For copies of papers and further information on this meeting please refer to the website
www.greatermanchester-ca.gov.uk.
Alternatively, contact the following Governance & Scrutiny Officer:

✉ Sylvia.welsh@greatermanchester-ca.gov.uk
📞 0161 778 7009

This supplementary agenda was issued 20 September 2019 on behalf of Julie Connor, Secretary to the Greater Manchester Combined Authority, Churchgate House, 56 Oxford Street, Manchester M1 6EU
Minutes of the GMCA Standards Committee Meeting held
17 September 2019 at Churchgate House, Manchester

Present

Geoff Linnell
Councillor David Greenhalgh
City Mayor Paul Dennett
Councillor Brenda Warrington
Councillor Andrew Western

Co-opted Independent Member
Bolton Council
Salford Council
Tameside MBC
Trafford Council

Also in attendance

Gwynne Williams
Sarah Horseman
Nicola Ward

GMCA Deputy Monitoring Officer
GMCA Head of Audit and Assurance
GMCA Governance

GMSC 19/09 Welcome and Apologies

Resolved /-
That apologies were received and noted from Councillor Elise Wilson and Nicole Jackson.

GMSC 19/10 Appointment of Chair

Resolved /-
That the appointment of Geoff Linnell, Independent Member as Chair for the 2019/20 municipal year be noted.

GMSC 19/11 Membership for 2019/20

Resolved /-
That it be noted that the following Members had been appointed by the GMCA to the Standards Committee for the 2019/20 municipal year, City Mayor Paul Dennett, Councillor Elise Wilson, Councillor David Greenhalgh, Councillor Brenda Warrington and Councillor Andrew Western.

GMSC 19/12 Terms of Reference

Resolved /-
That the Terms of Reference of the Standards Committee as agreed by the GMCA on the 28 June 2019 as part of the Constitutional review be noted.

GMSC 19/13 Minutes of the GMCA Standards Committee meeting held 12 February 2019

Resolved /-
That the minutes of the GMCA Standards Committee held 12 February 2019 be approved.
Introduction to Internal Audit

Sarah Horseman, Head of Audit and Assurance for the GMCA reported that she had been in post since April 2019, and asked whether there was any specific assurance that her team could provide to the Standards Committee going forward.

Members asked whether there had been any work undertaken in relation to the GMCA Whistleblowing Policy. It was confirmed that this policy was currently under review to ensure that it remained fit for purpose and that clear internal processes were in place.

Members also sought some assurance that although the GMCA is a relatively new organisation that the Internal Audit team are ensuring the right levels of due diligence, processes and protocols are in place and that matters such as fraud cases are appropriately referred to the Audit Committee. In addition, Members asked whether there was a role for the Standards Committee on such matters with respect to assessing behaviour and behavioural trends.

Resolved /

1. That the GMCA Whistleblowing Policy and processes be brought to the next meeting of the GMCA Standards Committee.
2. That an annual report regarding whistle blowing and any particular trends or behaviours in relation to the Anti-fraud and Corruption procedures be brought to the GMCA Standards Committee.

Committee on Standards in Public Life – Annual Report

Gwynne Williams, Deputy Monitoring Officer GMCA took members through the highlights from the Annual Report from the Committee on Standards in Public Life. She particularly drew attention to their comments that there remains a level of disparity between Codes of Conduct across Local Authorities and Combined Authorities but that a more detailed Code that goes further than high level principles, as adopted by the GMCA, is the most effective type of Code.

The report also discussed the availability of councillors’ address details within the public domain as a disclosable pecuniary interest on the register of interests. Members confirmed that this information is no longer required on election material, and that councillors can chose to list the town hall address if they would prefer.

Members considered the position of a councillor when using social media platforms, and how the Code would apply. A range of opinions were shared relating to in what capacity comments could be made through a personal / professional page, and it was felt that although these lines appeared blurred, that whenever an elected councillor is in public that the perception would be that they were acting in their official capacity..

Members asked whether the sanctions for not adhering to the Code had any significance or could act as a deterrent to offenders. It was confirmed that previously sanctions included
disqualification and suspension from office, but that these had been removed in favour of softer sanctions including withdrawal of roles, removal from committees and requests for apologies. However, the report from the Committee on Standards in Public Life recommends the re-introduction of a suspension for up to a six-months as a possible sanction for non-adherence to the code.

A member asked for clarification as to whether there would be a right of appeal following a sanction of suspension and it was confirmed that the recommendation included the safeguard of an appeal to the LGO.

The report also covered the publication of registered interests and suggested that councillors should not have to withdraw from the discussion or vote on a matter unless the interest created a conflict.

With regards to declaring pecuniary interests, the report highlighted that there were some omissions in the statutory instrument, for example, the absence of a requirement to declare un-paid employment, hospitality and gifts and the pecuniary interests of other close family members. Furthermore in relation to gifts and hospitality, that current thresholds of £100 per gift should be re-viewed in order to look at collective periods of time to ensure that there are not regular patterns to gifting just below thresholds.

Members considered those declarations made at a local level, which may also arise at GMCA e.g. the cricket strategy. Members were advised that on such occasions, the interest should be declared in relation to specific agenda items.

A member questioned whether failing to declare an interest would be reported to the GMCA Standards Committee. It was suggested that a report on the arrangements for dealing with complaints under the Code of Conduct is brought back to the GMCA Standards Committee.

The Deputy Monitoring Officer informed Members that the recommendations contained within the report would be monitored.

Resolved /-
1. To note the report.
2. That a report on the arrangements for dealing with complaints under the Code of Conduct be brought to a future meeting of the GMCA Standards Committee.

GMSC 19/16 Review of the GMCA Members Code of Conduct

Gwynne Williams, Deputy Monitoring Officer for the GMCA explained that the Code of Conduct was last reviewed in November 2017, however the Committee on Standards in Public Life Annual Report makes useful recommendations regarding provisions on harassment and the use of social media which may be worth specifically considering in relation to the GMCA’s code.
Resolved /-
1. That the report be noted.
2. That the review of the GMCA Code of Conduct specifically looks at the use of social media and strengthening the section on bullying & harassment.

GMSC 19/17 Standards Committee Work Programme

Members of the Committee discussed the proposed work programme and considered the proposed items for future agendas. Items suggested for consideration at the next meeting included – the Code of Corporate Governance, Complaints reporting, Whistleblowing processes and the process of declaring interests.

Resolved /-
1. That the work programme be noted.
2. That the GMCA Standards Committee meeting in April consider the Code of Corporate Governance, Complaints reporting, Whistleblowing processes and Arrangements for dealing with complaints under the Code of Conduct.

GMSC 19/18 Dates of future meetings

Resolved /-
That the GMCA Standards Committee next meet on Tuesday 14 April 2020.
Date: 27th September 2019

Subject: GMFRS Programme for Change: Proposed Amendments to Outline Business Case Following Analysis of Consultation

Report of: The Mayor, Andy Burnham and GMFRS Chief Fire Officer, Jim Wallace

PURPOSE OF REPORT

The purpose of this report is to highlight the proposed amendments to the OBC following review and analysis of the key consultation findings and considerations.

The report sets out:

- A summary of the improvements to the Service that have been made to date
- A high level overview of the consultation process and key findings
- Proposals for implementation (following refinement of OBC proposals to reflect consultation findings)
- Key activities underway to support the required leadership and culture change
- A summary of people impacts as a result of the proposed changes
- An overview of the financial implications and an updated efficiency profile
- Next steps and communications strategy

RECOMMENDATIONS:

The Greater Manchester Combined Authority is requested to:

1. Note the contents of this report and consider the updated proposals for implementation prior to the Mayor making a final decision.

2. Recognise that the OBC consultation feedback has influenced the updated proposals contained in this report.
3. Note that the updated proposals for implementation will now form the basis of ongoing discussions with Trade Unions.

CONTACT OFFICERS:

CFO, Jim Wallace – wallacej@manchesterfire.gov.uk
Programme Director, Dawn Royle – dawn.royle@tfgm.com
People Impacts (para 21) David Alexander – david.alexander@tfgm.com
Financial Implications (para 24) Richard Paver – richard.paver@greatermanchester-ca.gov.uk

OVERVIEW AND SCRUTINY COMMENTS AND RECOMMENDATIONS:

Further to the consultation process, the Committee commends the development of the revised range of options set out in the OBC and acknowledges the progress made by the Mayor in his attempt to deliver transformational change within GMFRS. The Committee recognises the difficulties posed by the major uncertainties surrounding central government funding for fire and rescue services and reiterated that the various saving proposals around crewing levels and fire engine numbers remained wholly unacceptable. It was acknowledged that the raising of additional funds through an increase to the Fire and Rescue Service element of the Mayoral General Fund Precept would require further consideration as part of the budget consultation process.

BACKGROUND PAPERS:

- Programme for Change: Outline Business Case
- Programme for Change: Consultation Report

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BACKGROUND

The Programme for Change (PfC) Outline Business Case (OBC) sets out a programme of transformation for Greater Manchester Fire and Rescue Service (GMFRS), laying the foundations for a stronger Fire and Rescue Service that is focused on keeping communities safe and delivering a sustainable, affordable, frontline first emergency service.

Following a period of consultation, the proposals set out within the OBC have been updated to reflect feedback and comments from staff, representative bodies and the public.

EXECUTIVE SUMMARY OF UPDATED PROPOSALS

Following the close of consultation, changes to OBC proposals were considered, resulting in a number of updated proposals for implementation, which are summarised below:

a. Retaining current crewing levels and maintaining firefighter numbers at or above May 2017 levels for this financial year;
b. Retaining an additional 11 specialist prevention staff to support complex cases and address safeguarding concerns;
c. Allowing more time for the transition of prevention activity to ensure firefighters are adequately trained and equipped;
d. Developing alternative delivery models for volunteering and cadets;
e. Retaining Prince’s Trust, reducing the number of teams from seven to five, whilst allowing more time to develop future options;
f. Developing an improved delivery model for Protection including continued efforts on High Rise, Grenfell implications and improving fire safety within the Private Rented Sector.
g. Undertaking a limited restructure of administration activity initially, allowing more time for the development of a centrally managed delivery model.
h. Recommendation that the capital schemes as set out in the OBC are incorporated into the Service’s Capital Programme.
i. Ongoing investment in stations, including welfare facilities.

IMPROVEMENTS TO DATE

Firefighters sit at the heart of these proposals, and will be supported by a Fire and Rescue Service which has a culture of trust, respect and accountability, together with improved working conditions, modern facilities and better training and equipment.

Firefighter’s views have been taken on board and as a result, a number of immediate improvements have been made to address some of the most common concerns.

- **Firefighters said they were not being heard**, staff have been engaged throughout and a frontline first focus adopted;
- **Firefighters said there were too many vacancies**, recruitment has been accelerated to reduce the current number of frontline operational vacancies;
• Firefighters said the shift system did not support a work life balance, new rostering arrangements have been put in place based on a 2-2-4 shift pattern to improve firefighter work/life balance;

• Firefighters said roster reserves were not family friendly, roster reserves have been removed, meaning firefighters have a clearer, family-friendly working pattern and know in advance which shift patterns they are working and which station they will be based at;

• Firefighters said there was no leave flexibility, a new policy has been put into place to allow firefighters to select their own annual leave creating greater flexibility;

• Firefighters said some fire station facilities were unacceptable, a number of fire stations have been refurbished to improve facilities, in particular facilities for female firefighters.

CONSULTATION PROCESS AND KEY FINDINGS

1. Ongoing engagement and feedback has been fundamental to refining the updated proposals for implementation. A comprehensive engagement approach was undertaken both before, during and after consultation, including a wide range of meetings and workshops with staff, regular engagement with Trade Unions, and full public consultation, as well as input and feedback from scrutiny committee.

2. Following the publication of the OBC on 11th March 2019, a twelve-week period of consultation commenced to gather feedback on the proposals outlined in the OBC.

3. In parallel with the formal consultation, a series of workshops were held with staff and key stakeholders across GMFRS to explore the OBC proposals and the implications of implementation in more detail, as well as considering any feedback/alternative proposals being put forward through consultation.

4. The consultation considered three main audiences:
   • Public consultation with local residents, groups and organisations:
     People unconnected to the organisation were encouraged to respond to specific areas relating to our statutory duties. Any comments received outside of these areas were still captured and considered as part of the wider consultation.
   
   • Staff engagement with an internal audience:
     Staff were encouraged to comment on any part of the OBC and were provided with multiple methods to respond. These activities were non-statutory.

   • Consultation with Trade Unions:
     Formal consultation with representative bodies took place throughout the process, allowing them to discuss and subsequently comment on any areas of the OBC.

5. The main areas of concern raised by the public related to the reduction in the number of fire engines, with reference to the emerging risks of protracted moorland fires, high rise buildings, future developments and the threat of terrorism.

6. The proposed station mergers in Manchester, Bolton and Stockport were not a major area of concern for any specific group of respondent.
7. The main areas of concern raised by staff included crewing levels on fire engines and increasing the role of the firefighter to include greater Place Based and partnership working. Firefighters also raised that they do not feel that they have the skills, training or expertise to deliver this work, as well as the potential conflict with operational duties – with the potential to negatively impact on both operational incidents and training.

UPDATED PROPOSALS FOR IMPLEMENTATION

8. A commitment was made from the outset to listen to people, and where appropriate, reflect consultation feedback by amending the OBC proposals. Feedback and comments have been taken on board and a high level summary of the key changes proposed are set out below:

Crewing Fire Engines with Four

9. Whilst the OBC recommendation to crew with four firefighters on fire engines remains an achievable option, it was recognised that there is resistance to this proposal from the public, staff and trade unions. Therefore, following the Mayor’s recent communication to MPs, it is proposed that current crewing levels and firefighter numbers are maintained at or above May 2017 levels (1121 firefighters) for this financial year.

10. Whilst the commitment is to maintain 1121 firefighters until April 2020, the establishment planning forecast indicates that the actual number of firefighters by this date will be 1176 (due to the current recruitment and retirement profile). Therefore, supported by overtime arrangements and the short-term use of reserves, current crewing arrangements can be maintained at 5:4:4 and 50 fire engines to allow more time for discussions with the Fire Brigades Union about the number of fire engines available and the crewing levels that can realistically be achieved. The long-term viability of this arrangement, however, is dependent on future funding settlements from central government.

Prevention

11. A number of concerns were raised throughout the consultation period in relation to the practicability of delivery within the proposed timelines. Further concerns were raised with regards to the capacity and ability of ‘on call’ firefighters to undertake some of the more complex prevention work, as well as some of the tasks associated with alternative curriculum youth engagement work.

12. An alternative approach has been developed to mitigate some of the risks of a reduced prevention and youth engagement function, which involves the realignment of some of the roles within the OBC from other workstreams. This approach, which can be achieved without any impact on the overall efficiency savings, will enable the appropriate levels of resource to oversee the long term coordination and support of these functions. This will
further support the transition phase and skills transfer, allowing firefighters more scope to undertake a wider responsibility in these areas.

13. In summary, having listened to feedback, the key changes to prevention proposals are:
   - Retaining a small number of specialist prevention staff to support complex cases and address safeguarding concerns;
   - Allowing more time for the transition of prevention activity to ensure firefighters are adequately trained and equipped;
   - Developing alternative delivery models for volunteering and cadets.

**Prince’s Trust**

14. Supported by direct discussion with the Mayor, consultation responses to the OBC in respect of Prince’s Trust delivery resulted in alternative proposals to the Mayor, which are recommended for further reflection.

15. In summary, the key changes to Prince’s Trust proposals focus on interim arrangements for delivery of the programme, reducing the number of teams from seven to five, whilst allowing more time to develop future options.

**Protection**

16. Activity undertaken during the ‘exploring the impacts’ phase has identified an improved delivery model for Protection including continued concentrated efforts on High Rise, Grenfell implications and improving fire safety within the Private Rented Sector. These changes can be achieved within the same financial parameters.

**Enabling Services (Administration)**

17. To mitigate against the risk of delayed implementation, a limited restructure will be undertaken in year 1 (2019/20) and a number of posts will remain vacant in order to achieve cost savings in the interim. This will allow more time for the development of a new delivery model for year 2 (2020/21) based on centrally managed area teams with clear accountability to borough management.

18. It is recommended that all other proposals set out within the OBC are implemented as planned.

**LEADERSHIP AND CULTURE**

19. Firefighters sit at the heart of these proposals, and for them to be effective the Service will need to embed a culture of trust, respect and accountability. This is why it is recommended that the leadership and culture programme of work is progressed as planned within in the OBC and work has commenced to prepare the Service and its leaders for change and to build a supportive and inclusive environment.
20. Significant key activities that are shaping the strategic delivery plan include:
- Adoption of the National Fire Chiefs Council (NFCC) Leadership Framework
- Launch of GMFRS Equality, Diversity and Inclusivity (EDI) Strategy
- Enhanced staff engagement, utilising Best Companies and Stonewall surveys
- Improved staff communication

PEOPLE IMPACTS

21. With regard to support staff people impact, options have been explored to reduce the number of staff anticipated to be at risk. The updated proposals result in Year One savings (2019/20) being largely achievable through effective vacancy management.

22. Positive discussions continue with Unison to ensure the future headcount reduction can be achieved via voluntary severance/early retirement.

23. To put this in to context, the post-consultation analysis in respect of Voluntary Severance / Voluntary Early Retirement (VS/VER) is much improved, with the number of posts at risk reduced from 113 to 60, as summarised in the table below:

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<td>OBC (proposed FTE reduction)</td>
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<td>28</td>
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<td>113*</td>
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<td>Post Consultation Refinement</td>
<td>5 (plus 48 vacancies)</td>
<td>55 (proposed FTE reduction subject to detailed design)</td>
<td>60 (plus 48 vacancies, totalling 108 posts)</td>
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*Note: headcount figures are based on an administrator’s average salary.

24. There remains the potential for impact on firefighter numbers and an associated financial impact as a result of any delay to the introduction of crewing fire engines with four.

FINANCIAL IMPLICATIONS

25. The OBC sets out a range of options to deliver savings for GMFRS, alongside investment required to deliver transformational change. The outcomes from the programme affect the GMFRS Revenue Budget for 2019/20 and onwards. At the time of budget setting, reserves were used to underpin the budget until the proposals are approved and can be implemented. The 2019/20 revenue budget approved the use of £3.5m from reserves to support the revenue budget.

26. For 2020/21 there are major uncertainties regarding Government funding and particularly whether the £5.7m of Fire pension grant continues. The Home Office received a settlement of £12.9bn for 2020/21 representing a 6.1% real terms increase on
2019/20. Decisions on funding for fire and rescue from the Home office will be made as part of the allocations process that will now follow the Spending Round. This will include consideration of the fire pensions grant, National Resilience grants, ESN and other Home Office fire funding streams.

27. Confirmation on the above is expected as part of the Local Government Settlement due in December 2019. At this stage based on the uncertainties set out above, there may be a requirement in 2020/21 to utilise reserves and / or increase precept to meet any shortfall. The outcome of the Comprehensive Spending Review and formula funding review will influence the budget position in 2021/22.

28. In the area of Protection, an additional £10m per annum will be provided by MHCLG to help improve building inspection capabilities and to support the work of the new Protection Board chaired by NFCC. Funding allocations for each fire and rescue service will be published as part of the Provisional Local Government Settlement later this year.

29. The Spending Review for Fire and Rescue confirms the following:
   a. Settlement funding assessment will be increased by inflation
   b. Decisions on the council tax precept will be subject to a consultation due to be launched shortly

**NEXT STEPS AND COMMUNICATIONS STRATEGY**

30. In order to ensure appropriate delivery arrangements are in place to implement agreed proposals, work has been undertaken to effectively prepare for implementation. This activity will now progress into the detailed design and implementation stages.

31. To complement the detailed design and implementation phase, a comprehensive programme of communications and engagement activity across GMFRS will take place. The Trade Union forums will continue to meet on a regular basis.

32. The Communications and Engagement Team will keep colleagues informed of progress and decisions made through a number of different channels, such as the intranet, GMCA newsletters and organising face to face sessions between senior leaders and GMFRS colleagues.

**RECOMMENDATIONS**

33. The Greater Manchester Combined Authority is asked to:
   1. Note the contents of this report and consider the updated proposals for implementation prior to the Mayor making a final decision.
   2. Recognise that the OBC consultation feedback has influenced the updated proposals contained in this report.
3. Note that the updated proposals for implementation will now form the basis of ongoing discussions with Trade Unions.
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Date: 27 September 2019
Subject: A Bed Every Night
Report of: Andy Burnham, Mayor of Greater Manchester

PURPOSE OF REPORT

Provide GMCA with a full update on A Bed Every Night service moving into its next phase and to seek approval for funding arrangements as outlined.

RECOMMENDATIONS:

The GMCA is requested to:

1. To note the commitment of funds to support A Bed Every Night from Greater Manchester Health and Social Care Partnership, The Mayor’s Homelessness Charity, Community Rehabilitation Company, Police and Crime Commissioner, Tackle for Manchester.

2. To note and approve the grant allocations to districts as set out at paragraph 4.5.

3. To note and approve the allocation from Mayoral reserves and future GMCA and Mayoral budgets and reserves as set out at paragraph 5.2.

CONTACT OFFICERS: Molly Bishop, Strategic Lead for Homelessness and Rough Sleeping, GMCA and Jane Forrest, Assistant Director, Public Sector Reform, GMCA

Molly.Bishop@greatermanchester-c.org.uk
Does this report relate to a major strategic decision, as set out in the GMCA Constitution? No

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency? No

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1.0 INTRODUCTION

1.1. Tackling homelessness and rough sleeping are key priorities of local authorities in Greater Manchester, the GMCA and of the Mayor of GM himself. Our commitment is to end the need for rough sleeping in GM by May 2020 and to develop a 10-year strategy to reduce homelessness.

1.2. Nationally, this issue has increased in prominence and coverage, with central government now committed to halving rough sleeping by 2022 and ending it by 2027 and publishing the first National Rough Sleeping Strategy in August 2018.

1.3. Over the past 3 years, GMCA have been developing a range of programmes to support local authorities’ work in tackling homelessness and to support the Mayor in his commitments on rough sleeping. These programmes have been jointly developed through a joint bidding and negotiation process with central government and supported by every local authority.

1.4. A range of targeted interventions for rough sleepers and those at imminent risk of rough sleeping has effectively increased the number of options for people to access the right accommodation at the right time.

1.5. A Bed Every Night is one option alongside existing temporary accommodation, supported accommodation, Social Impact Bond (SIB) sourced accommodation, Housing First sourced accommodation, supported access to private rented accommodation, and other local types of provision such as refuges and night stops.

1.6. It is essential that the individual’s statutory duty, personal preference and support needs are taken into consideration at the earliest opportunity to ensure the most appropriate accommodation pathway is available to them.

1.7. A Bed Every Night is there to ensure that no one has to sleep rough in Greater Manchester and experience the risks of doing so, especially over the winter months. It is also there to provide a way forward and away from rough sleeping through the support and move on pathways that flow from it.

2.0 CONTEXT

2.1. The A Bed Every Night (ABEN) programme commenced across all areas of Greater Manchester on 01 November 2018 to provide emergency accommodation to relieve and prevent the need for rough sleeping where statutory and existing discretionary or voluntary services were not able.
2.2. Local areas established their own responses to ABEN, utilising a common framework and a commitment that there should be a bed available to anyone from Greater Manchester who would otherwise be rough sleeping.

2.3. Originally intended to last until 31 March, it was extended due to its success and the significant levels of demand for the service. It was clearly demonstrated that there were high levels of a need for this type of ‘crisis response’ and triage for rough sleepers, to provide immediate shelter and referrals into move on services.

2.4. The programme exceeded expectations in terms of take-up and local demand. Between November 2018 and May 2019 over 2000 people have been assisted through the programme, with over 680 able to access more appropriate and secure accommodation. On average, 300 people a night have been accommodated in ABEN provisions.

2.5. With input from GM Homelessness Action Network and practitioners, and a review of ABEN Phase 1 conducted by Dame Louise Casey, recommendations were identified for furthering the ABEN initiative into a second phase from April 2019 to June 2020.

2.6. Finding options to extend and strengthen ABEN has resulted in considerable investment to establish a more consistent offer across Greater Manchester which this report lays out.

3.0 ABEN PHASE 2

3.1. The Phase 2 ABEN model is based on a number of key areas identified for improvement and in ongoing consultation with a range of stakeholders. This includes;

- Implementation of a commissioning framework
- Agreement of new service standards and specification
- Development of specific provision for defined cohorts
- Increased focus on improving health outcomes
- Increased focus on awareness of health and care risks
- Embedding into the wider homelessness system
- Commissioning of an independent evaluation

3.2. Allocation of provision and bed numbers have been built from an identified local need and the provision types that are viable in each local authority. The GMCA has worked with local authorities to ensure that the specification standards are clear and where not all relevant provision is available in every borough, the total number of bed spaces and types of provision necessary are available across Greater Manchester ABEN as a whole.

3.3. Provision of allocation is therefore varied across local authorities but should be seen as a whole service, within which individuals will be able to access the most appropriate ABEN accommodation if it is not available in their first borough of choice.
3.4. All local authorities have committed to a fixed number of bed spaces, moving away from a spot purchasing model to ensure certainty in onward commissioning. Bed numbers meet the current rough sleeper numbers that are identified monthly through the Rough Sleeper Initiatives (RSIs), and seek to meet the profile of this cohort regarding support needs, requirement of single sex spaces and provision for pets. There is also an increase in the number of beds being provided over the winter months to allow for anticipated winter pressures to be met.

3.5. Over the course of the programme there is a 65% to 35% split between ‘lower’ and ‘higher’ levels of need that can be supported and accommodated safely. In many localities this is flexible, with the use of shared spaces becoming single spaces if needed. The total number of spaces available is shown below.

<table>
<thead>
<tr>
<th>Time period</th>
<th>Provision spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quarter 2 2019/20</td>
<td>300</td>
</tr>
<tr>
<td>Quarter 3 2019/20</td>
<td>420</td>
</tr>
<tr>
<td>Quarter 4 2019/20</td>
<td>420</td>
</tr>
<tr>
<td>Quarter 1 2020/21</td>
<td>375</td>
</tr>
</tbody>
</table>

3.6. 4 provisions provide core female only spaces, with a further 15 provisions able to offer this flexibly as required. 8 provisions provide spaces for couples (available as needed). 8 provisions provide spaces for people with pets (available as needed).

3.7. Access into ABEN will be led by local outreach and housing options teams to ensure targeting for current rough sleepers, with the appropriate accommodation offer in each instance. This work is strengthened by the provision of Rough Sleeper Initiative’s in all 10 local authority areas, with a targeted approach to identifying and supporting rough sleepers and liaising with housing options teams to identify appropriate accommodation options, of which ABEN is one.

3.8. Each local authority operates an in and out of hours telephone service to provide housing advice, take referrals and manage emergency placements. These services vary greatly across the boroughs with regard to capacity and process, especially for out of hours. Work is ongoing to ensure a consistent approach to referral and placement that can be communicated to referring agencies and members of the public.

3.9. Public information on ABEN encourages referral into outreach and housing options teams through the national service Street Link and highlights the current work of local teams to ensure anyone rough sleeping can access appropriate accommodation.

3.10. Significant financial input jointly from GM Health and Social Care Partnership and GM Joint Commissioning Board was agreed in June 2019 to support core accommodation provision
for Phase 2. In addition to this, a commitment was made to utilise the investment period to support an iterative improvement process in health provision, amass understanding of current practice and use this to inform a longer term plan on homeless healthcare. This is in addition to the financial contribution to ABEN and demonstrates further commitment from the health sector to invest time and additional resources in ensuring appropriate health provision is available to people experiencing homelessness.

3.11. Individuals with No Recourse to Public Funds will be able to access ABEN through funding provided by the Mayor’s Homelessness Charity (as opposed to any public funds). This includes those who are failed asylum seekers and non-eligible EEA nationals. GMCA is seeking specialist advice and support for this cohort, who face extreme challenges accessing secure accommodation.

3.12. Supporting individuals to move into more suitable and secure accommodation is a key priority. Not only does this ensure that ABEN is supporting people to move away from rough sleeping and building sustainable outcomes, but it also ensures flow through ABEN necessary to meet ongoing demand.

3.13. Traditional housing options are typically very restricted for the cohort eligible for ABEN, who fall under the ‘non-priority’ legal category of homelessness. Innovative use of local resources and flexibility from housing providers are essential to ensure move on into both the social and private rented sector. Programmes that seek to re-house entrenched rough sleepers (such as Housing First) will also be mobilised to focus on this cohort where appropriate.

3.14. The Homelessness Programme Board (established in May 2019) provides oversight and scrutiny of all elements of the GM homelessness infrastructure, including ABEN, but also the Homelessness Prevention Trailblazer, Entrenched Rough Sleeper Social Impact Bond and Housing First. With representatives from across Health, Third Sector and local authorities it is able to draw upon considerable whole systems knowledge and deliver strategic governance for A Bed Every Night.

4.0 PHASE 2 COSTS AND GRANT AGREEMENTS

4.1. The ABEN Phase 2 programme costs are outlined below:

- Grant of £5,487,000 to the 10 local authorities to fund emergency accommodation and support of up to 420 individuals

- Programme co-ordination across Greater Manchester at a cost of £65,000 delivered by Riverside
• Health interventions and health development work, delivered by HSCP at a cost of £50,000
• A formal evaluation which will be commissioned externally at a cost of £50,000

4.2. No Mayoral reserves will be committed to funding activity other than that delivered by the districts as included in their grant allocation. Staffing, evaluation and health development work will be funded through the combined investments from the other investors (see section 5).

4.3. Each local authority will receive a specified grant amount to provide ABEN in their area. Individual allocations were assessed using the ‘low and high need’ benchmark costings provided in the specification as a baseline. Owing to the variation in need and provision type across local authorities, it has been possible to fund provisions at both lower and higher rates, reflecting actual costs and enabling funding for additional provision due to an overall reduction in per night costs.

4.4. The ABEN Phase 2 programme, as with Phase 1, assures that local authorities will contribute their usual spend for Severe Weather Emergency Provision (SWEP) or an amount matching the proportion of the total grant they will be in receipt of for ABEN. This has ensured an equitable and proportionate contribution from each of the 10 local authorities.

4.5. Proposed grant allocations to local authorities are outlined here:

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Grant allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bolton</td>
<td>£580,000</td>
</tr>
<tr>
<td>Bury</td>
<td>£140,000</td>
</tr>
<tr>
<td>Manchester</td>
<td>£1,900,000</td>
</tr>
<tr>
<td>Oldham</td>
<td>£243,000</td>
</tr>
<tr>
<td>Rochdale</td>
<td>£109,000</td>
</tr>
<tr>
<td>Salford</td>
<td>£1,570,000</td>
</tr>
<tr>
<td>Stockport</td>
<td>£140,000</td>
</tr>
<tr>
<td>Tameside</td>
<td>£320,000</td>
</tr>
<tr>
<td>Trafford</td>
<td>£160,000</td>
</tr>
<tr>
<td>Wigan</td>
<td>£325,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£5,487,000</strong></td>
</tr>
</tbody>
</table>

4.6. The 15 month funding envelope for ABEN includes Quarter 1 of 19/20, actual costs which are already known and have been taken into account.

4.7. Payments made to local authorities will be administered quarterly by the GMCA based on their grant agreements. Any additional costs or burdens due to severe weather that have not been met through the ABEN grant agreement will rest with the local authority.
5.0 INVESTMENT

5.1. Significant investment into an enhanced ABEN service has been levied from a range of sources, totalling £5,652,000.

5.2. This investment package will cover the delivery of ABEN over a 15 month period from April 2019 – June 2020.

<table>
<thead>
<tr>
<th>Source</th>
<th>Investment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mayor’s Homelessness Charity</td>
<td>£1.2m</td>
</tr>
<tr>
<td>Tackle 4 Manchester</td>
<td>£1m</td>
</tr>
<tr>
<td>Health and Social Care Partnership</td>
<td>£2m</td>
</tr>
<tr>
<td>Police and Crime Commissioner</td>
<td>£250,000</td>
</tr>
<tr>
<td>Community Rehabilitation Company</td>
<td>£250,000</td>
</tr>
<tr>
<td>Mayoral Reserves</td>
<td>£900,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>£5,652,000</strong></td>
</tr>
</tbody>
</table>

5.3. £1m is anticipated from Tackle 4 Manchester through Vincent Kompany’s testimonial funds. This is underwritten by Mayoral budgets and reserves in the event that these monies are not realised.

5.4. £900,000 has been identified through existing Mayoral reserves largely from underspend on 2018/19 programmes. It is also likely that GMCA will receive monies through a range of identified funding streams over the period of Phase 2 and this will potentially mitigate the use of Mayoral reserves:

- MHCLG Winter Provision: GMCA is already in dialogue with MHCLG regarding the annual Cold Weather Fund. GMCA will be seeking an overall GM allocation to invest into ABEN (as the GM approach to Severe and Emergency Weather Provision).

- Government Spending Round: GMCA is commencing dialogue regarding the additional funding announced by the Chancellor at the September Spending Round of £54m spending for rough sleeping.

- The Mayor’s Homelessness Charity: there is continued public and private backing for A Bed Every Night from high profile donors and organisations. Alongside the possibility of a larger than expected donation from Vincent Kompany, continued funding from a range of other donors and fundraising activities is expected.
6.0 FURTHER DEVELOPMENTS

6.1. There are a range of areas of further developments to ensure maximum impact of this programme and the impact it will have on individuals.

6.2. Offsetting costs through Housing Benefit has been explored in those provisions that usually claim, however more focused work to identify eligibility across all 24 hour provision is needed. Criteria for supporting service user claims and reasonable expectations of cost offsetting through this method will be developed over the course of the programme.

6.3. An assurance framework is being developed with Key Performance Indicators which will provide a clear reporting mechanism, and feed into financial assurance for grant claims.

6.4. A communications plan is being developed to ensure that local authorities, partners and stakeholders have clear channels of communication from the GMCA and feedback loops are in place to escalate challenges in a timely manner.

6.5. Qualitative analysis including service user feedback will be commissioned to provide a formal evaluation. This will be supported by a Cost Benefit Analysis completed at GMCA with support from King’s Fund.
DECARBONISING
GREATER MANCHESTER’S EXISTING BUILDINGS

A REPORT TO THE GREATER MANCHESTER COMBINED AUTHORITY
CONTENTS

EXECUTIVE SUMMARY ................................................................................................................. 4

1. INTRODUCTION AND SCOPE OF THIS REPORT ................................................................. 9
   1.1 Introduction .......................................................................................................................... 9
   1.2 Scope .................................................................................................................................. 9
   1.3 Structure of this report ......................................................................................................... 11

2. WHY DOES GREATER MANCHESTER NEED TO TAKE ACTION? ................................. 12
   2.1 The multiple benefits of taking action .................................................................................. 12
   2.2 Benefits for Greater Manchester’s residents ....................................................................... 12
   2.3 Benefits for Greater Manchester’s economy ......................................................................... 13
   2.4 Benefits for Greater Manchester’s environment ................................................................. 14
      2.4.1 Buildings’ energy use and CO\textsubscript{2} emissions ..................................................... 14
      2.4.2 The scale of reductions in CO\textsubscript{2} emissions required ........................................... 15

3. DOMESTIC PROPERTIES ......................................................................................................... 21
   3.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO? ........................................ 21
      3.1.1 Priorities for decreasing energy demand in domestic properties ............................... 21
      3.1.2 Tackling fuel poverty by reducing energy demand ..................................................... 21
      3.1.3 Delivering the level of fabric improvements required across all households to meet Greater Manchester’s aims for CO\textsubscript{2} emissions reductions ........................................... 21
      3.1.4 Enabling a “just transition” ............................................................................................ 22
   3.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS? ................................................................................. 22
      3.2.1 Tackling fuel poverty by reducing energy demand ..................................................... 22
      3.2.2 Gaps and issues with the ECO framework .................................................................. 23
      3.2.1 Delivering the level of fabric improvements required across all households to meet Greater Manchester’s aims for CO\textsubscript{2} emissions reductions ........................................... 24

4. COMMERCIAL BUILDINGS ..................................................................................................... 37
   4.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO? ........................................ 37
      4.1.1 Priorities for increasing energy efficiency in commercial buildings ......................... 37
   4.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS? ................................................................. 37
      4.2.1 Measuring and reporting on the operational energy performance ............................ 37
      4.2.2 Reducing energy use by improving operational energy performance .................... 39
      4.2.3 Setting a pathway for improving operational energy performance ......................... 40

5. PUBLIC BUILDINGS .................................................................................................................. 42
   5.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO? ........................................ 42
      5.1.1 Priorities for increasing energy efficiency in commercial buildings ......................... 42
5.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS? ................................................................. 42

5.2.1 Measuring and reporting on the operational energy performance of public buildings 42

5.2.2 Improving the efficiency of Greater Manchester’s existing public buildings .... 43

6. BRINGING IT TOGETHER ............................................................................................................................................................................ 44

6.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO? ............................................ 44

6.1.1 Mission-oriented approach............................................................................................................................................................... 44

6.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED? 44

6.2.1 The roles of different organisations within Greater Manchester ........................... 44

6.2.2 Building on existing partnerships to work together in new ways ..................... 45

6.2.3 Next steps...................................................................................................................................................................................... 47
EXECUTIVE SUMMARY

The importance of buildings in meeting Greater Manchester’s environmental ambitions

In its 5 Year Environment Plan, Greater Manchester set an ambition to be carbon neutral by 2038. Reducing the amount of energy used in Greater Manchester’s existing buildings will be key to achieving this aim, especially given 95% of Greater Manchester’s existing buildings are still likely to be in use by 2050.

This report builds on the priorities and actions on buildings in the 5 Year Environment Plan. It sets out where Greater Manchester is now and where it needs to get to in terms of the energy demand of its existing domestic, commercial and public buildings. Based on that, it provides a set of recommendations for taking action.

The opportunity and the need to take action

Investing in reducing the energy used in Greater Manchester’s buildings offers a significant opportunity that would bring with it multiple benefits, not just for the city-region’s environmental ambitions.

For Greater Manchester’s residents, homes that are warmer, more comfortable and have good ventilation are healthier homes, improving people’s physical and mental health. They are also cheaper to heat, meaning Greater Manchester residents and businesses would spend less on their fuel bills and be more resilient to future energy price rises.

For Greater Manchester’s economy, a healthier population means increased productivity and less public spending on healthcare. Businesses that use their energy more efficiently are more productive and also provide better environments to work in – they can also be more attractive to potential employees and better at retaining staff. Investment in improvements in Greater Manchester’s building stock also presents an opportunity for growth in jobs and skills in the construction and associated sectors in the city-region.

For Greater Manchester’s environment, tackling energy demand in existing domestic, commercial and public buildings is crucial to meeting its ambitions for carbon neutrality. Modelling shows that without action to increase the extent and depth of current activity in this area, Greater Manchester will not be able to meet its aims. The step-change this modelling shows is required informs the approach proposed and recommendations made in the rest of this report so that Greater Manchester can realise its ambitions.

Reducing energy demand in homes

In Greater Manchester’s homes, continued effort is needed to ramp up actions to help reduce the energy demand of those residents in or at risk of falling into fuel poverty, continuing to maximise the use of national funding streams (particularly Energy Company Obligation – ECO – funding) by using local flexibilities, whilst making the case for greater local influence so that this funding better aligns with Greater Manchester’s ambitions. This funding does not currently provide for the extent and depth of improvements needed in homes to meet Greater Manchester’s environmental and wider ambitions (Recommendation 1).
At the same time, Greater Manchester needs to scale up deeper retrofit of homes across the city-region. This presents significant opportunities to realise the benefits set out above – for improving people’s health and increasing wealth. To realise the scale of reduction in CO₂ emissions from reducing buildings’ demand for energy, Greater Manchester need tens of thousands of deeper retrofits every year. Modelling informing Greater Manchester’s 5 Year Environment Plan is based on 61,000 retrofits a year which, on average, reduce heat loss per house by 57%. At present, deeper retrofit projects achieving this scale of reduction are pilots of 10s or at most 100-200 homes, or are not retrofitting to the depth needed.

There are barriers that prevent scaling up what has been achieved in these projects and which would need to be overcome to realise domestic retrofit to the extent and depth required. These barriers include:

- The need to adopt a whole-property (or whole-house) approach to retrofit, understanding what level of reduction in demand (in particular for heating) and CO₂ emissions can be achieved across Greater Manchester’s different types of properties (Recommendation 2). At the same time, a whole-house approach needs to be embedded to make sure that retrofit measures are always carried out as part of an overall plan for that property to avoid piecemeal change or unintended consequences.
- The need to develop attractive financial offers for homeowners and financial models for investors (in the public and private sectors) to overcome the high up-front capital costs of deeper retrofit (Recommendation 3). Patient finance, such as green mortgages, equity loans and other forms of loan funding (e.g. revolving loan fund), needs to be available at scale to overcome this barrier.
- The need to develop both the capability (upskilling) and capacity of the supply chain required to deliver deeper retrofit. The supply chain for retrofit will not develop without first seeing, real, evidenced demand emerge, meaning that the supply chain and the stimulation of demand needs to take place in tandem. In particular, the issue of a shortage of a sufficiently large skilled workforce to deliver on this scale needs to be tackled across providers, learning and skills support agencies and trade bodies (Recommendation 4).
- The need to develop delivery models that build awareness of whole-house deeper retrofit, target those people most likely to be early adopters of it, build trust in delivery and the supply chain and coordinate a smooth customer journey through the process (Recommendation 5).

Tackling these challenges in a way that then enables the retrofit of domestic properties at the required scale and depth will require innovative approaches to delivery in partnership between the public, private and third sector.

Reducing energy demand in commercial buildings

The energy demand from commercial buildings in Greater Manchester also needs to see a significant reduction, with modelling informing Greater Manchester’s 5 Year Environment Plan based on a 30% decrease in commercial space heating demand by 2040.

There are similar barriers to reducing energy demand in Greater Manchester’s commercial buildings. At present, the incentives for and ability of commercial property owners to retrofit their buildings to achieve these level of reductions are mixed. The valuing of energy efficiency in commercial buildings therefore needs to be built up in the market through better measurement and reporting, which would drive improvements. This includes:
- Building measurement and reporting into new developments using the planning system (Recommendation 6).
- Setting out a pathway for embedding measurement and reporting for commercial building heat demand, starting with voluntary reporting whilst looking at ways to encourage (e.g. via nudge) or mandate this in the future (Recommendation 7).

Reducing energy demand in public buildings

At the same time, Greater Manchester’s public sector needs to lead by example in reducing the energy demand of its buildings. GMCA and local authorities have already made commitments around the energy efficiency of their buildings as part of the 5 Year Environment Plan. This should be adopted by other public sector organisations in Greater Manchester (e.g. health sector, universities) and measurement and reporting standardised to help drive up standards (Recommendation 8). Other organisations beyond the GMCA and local authorities should set ambitions and targets for energy efficiency as a result and deliver improvements against these (Recommendation 9).

How to take this forward

Tackling forward this challenge and implementing the recommendations in this report must be a joint effort between the public, private and third sectors. These organisations can each bring different areas of expertise to help take forward these recommendations. In addition, national government has some of the most powerful levers to tackling the issues set out here – this report provides a means of engaging government on Greater Manchester’s needs and priorities.

Given that and the ambition of the 5 Year Environment Plan to adopt a mission-oriented approach to its implementation, it is recommended that a Retrofit Challenge Group be established in Greater Manchester as part of the Green City Region Partnership, providing a more formal means of bringing these organisations together to take forward the recommendations in this report and drive the change needed in Greater Manchester’s buildings (Recommendation 10). This reflects the complex nature of the challenges faced and the need for coordinated action across sectors.
### List of recommendations

<table>
<thead>
<tr>
<th>No.</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Partners across Greater Manchester should develop proposals for and push for changes to current the current ECO framework when it ends in 2022 to better align it with the city-region’s ambitions.</td>
</tr>
<tr>
<td>2</td>
<td>Partners across Greater Manchester should carry out further research to identify appropriate space heating demand targets for Greater Manchester property types, informed by the emissions reductions in the SCATTER model. This work would provide a set of indicative targets required from the retrofit of homes to meet Greater Manchester’s ambitions and that can be feasibly delivered at Greater Manchester’s property types.</td>
</tr>
<tr>
<td>3</td>
<td>The GMCA, key partners and investors should work together to develop commercially attractive business models for investment in retrofit of social and private housing. At the same time, GMCA, working with key partners and government (to consider this as part of national policy and green finance initiatives), should develop options for the potential use of council tax as a “nudge” to increase energy efficiency.</td>
</tr>
<tr>
<td>4</td>
<td>The GMCA, learning and skills support agencies, providers, innovation hubs and existing trade bodies should come together to understand the future needs and opportunities presented by whole-house deep retrofit and develop packages of work to tackle the issues this identifies.</td>
</tr>
<tr>
<td>5</td>
<td>Partners across Greater Manchester should collaborate to develop a delivery model to build up local markets for whole-house deeper retrofit. This should build on and learn from the findings of recent work in this area, including government funded pilots like People Powered Retrofit and RetrofitWorks, as well as previous programmes like Green Deal Communities.</td>
</tr>
<tr>
<td>6</td>
<td>The GMCA and local authorities should explore the potential for introducing requirements for new developments to report on operational energy performance, and as part of that, on space heating demand.</td>
</tr>
<tr>
<td>7</td>
<td>Working with key partners, GMCA should develop and implement a pathway to lead to an increase in the measurement, reporting and improvement of energy efficiency in commercial buildings, and as part of that, on space heating demand.</td>
</tr>
<tr>
<td>8</td>
<td>The GMCA, local authorities and the public sector across Greater Manchester should ensure standardised measurement and annual reporting (as part of reporting against the 5 Year Environment Plan) on the energy efficiency of their buildings, including their Display Energy Certificate ratings and a measure of space heating demand.</td>
</tr>
<tr>
<td>9</td>
<td>The GMCA and local authorities should work to deliver agreed targets for the energy efficiency of their buildings, including their Display Energy Certificate ratings and developing a measure and targets for space heating demand, and encourage other public sector organisations to do likewise.</td>
</tr>
<tr>
<td>10</td>
<td>The GMCA should put in place a Greater Manchester Low Carbon Buildings Challenge Group, which, through establishing specific task and finish groups, would</td>
</tr>
<tr>
<td>provide cross-sector approach to tackling the systemic challenges associated with retrofit across all building types.</td>
<td></td>
</tr>
</tbody>
</table>
1. INTRODUCTION AND SCOPE OF THIS REPORT

1.1 Introduction

Greater Manchester’s buildings provide the homes in which people live and the places in which people work, spend their spare time and access public services. The city-region’s buildings are essential to health and prosperity. Greater Manchester needs safe, good quality housing to live healthy, prosperous lives; it needs good quality workplaces to attract, retain and grow businesses; and it needs good quality public buildings in which people can access public services (e.g. education, health) and spend their spare time (e.g. accessing leisure and culture).

Having buildings that use less energy – are warm, safe, healthy, comfortable and cheaper to heat and produce lower CO\textsubscript{2} emissions – is a key part of this. A building’s energy demand and how it uses its energy is a key factor in a building’s comfort and the cost for its owner or occupier to power and heat it.

Alongside energy generation, a building’s energy demand also has a key impact on a building’s environmental footprint, with buildings a significant source of CO\textsubscript{2} emissions generated within Greater Manchester. 33\% of Greater Manchester’s CO\textsubscript{2} emissions are generated in homes, with a further 32\% in business and industrial premises. Reducing CO\textsubscript{2} emissions from its buildings will be therefore be vital to Greater Manchester’s wider aims for making its fair contribution to mitigating climate change and in delivering the ambitions set out in its 5 Year Environment Plan.

1.2 Scope

This report focusses on the action needed to decarbonise Greater Manchester’s buildings to realise the multiple benefits this can bring. The report’s main focus is on reducing their demand for energy through improvements to a building’s fabric. The supply of energy to buildings is also crucial to decarbonising them. The priorities and actions required to decarbonise the sources of power (renewable energy generation) and heat (low carbon heating) to buildings is set out in Greater Manchester’s Smart Energy Plan\footnote{https://es.catapult.org.uk/news/smart-energy-plan-greater-manchester-combined-authority/}. These are not duplicated in this report – however, it is recognised in this report that, at the level of a particular building or group of buildings, putting in place measures to a building’s fabric that reduce demand alongside energy generation/storage is likely to deliver multiple benefits, for both the homeowner/occupier and in reducing CO\textsubscript{2} emissions.

In terms of the priorities related to reducing energy demand, the following points set out the scope of this report:

- **Ways of reducing energy demand** – the report’s main focus is on how efficient buildings are at being heated and kept warm, whilst maintaining good levels of ventilation. This is due to the fact that this is the most significant challenge in reducing CO\textsubscript{2} emissions from buildings. Other activities, which result in energy demand in buildings are less significant and are not covered within this report. These include:
  - Active cooling – these technologies (e.g. air conditioning) are generally not installed at domestic properties. In commercial properties, active cooling is estimated to only account for an eighth of the energy consumption that
heating does (0.75 TWh/year for cooling versus 5.8 TWh/year for heating). However, the demand for cooling is likely to increase in future years given the predicted impacts of climate change on Greater Manchester. Cooling will therefore need to be taken into account in the design and carrying out of retrofitting of buildings, particularly in ventilation, glazing and shading.

- **Hot water** – the efficiency of hot water systems is largely reliant on the efficiency of the appliance and system installed, with new appliances required to meet certain efficiency rating standards.
- **Appliances and lighting** – efficiency continues to be driven up by product design standards, requiring certain efficiency rating standards in new products.
- **Industrial energy use** – the use of energy for industrial processes is not covered within this report and will instead be looked at through the development of a Greater Manchester Sustainable Consumption and Production Plan, which will include a focus on resource efficiency.

### Age of buildings

The report largely focuses on existing buildings rather than new buildings that will be constructed in the future. In Greater Manchester, there are around 1.2 million existing homes (see Figure 1 for the age of Greater Manchester’s domestic properties), of which the vast majority (95%) are likely to still be in use by 2050. The Greater Manchester Spatial Framework sets out the objective to deliver 201,000 new homes by 2037, alongside ambitions for office, industrial and warehousing space. The approach of the GMCA and Local Authorities to decarbonising new buildings and developments through spatial planning policy is set out in the Greater Manchester Spatial Framework.

![Figure 1: Age distribution of Greater Manchester’s domestic properties.](source: Greater Manchester Spatial Energy Plan)

### Type and use of buildings

This report recognises the differences between domestic and non-domestic properties. Within the latter category, the report looks at commercial and public buildings separately.

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2 Spatial Energy Plan (2016) – extrapolating figures for cooling demand across the north west to a Greater Manchester level (using a per capita measure).
3 [https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/](https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/)
1.3 Structure of this report

The subsequent sections of this report are structured as follows:

- Section 2 – why Greater Manchester needs to take action now to reduce energy demand in its existing buildings.
- Sections 3, 4 and 5 – these take domestic, commercial and public buildings in turn, with each looking at:
  o Where Greater Manchester needs to get to
  o Where Greater Manchester is now and what this means for what needs to be done now and over the next 5 years.
- Section 6 – how the recommendations set out in this report should be taken forward by the GMCA and key stakeholders.
2. WHY DOES GREATER MANCHESTER NEED TO TAKE ACTION?

2.1 The multiple benefits of taking action

Taking action to reduce energy demand in Greater Manchester’s existing buildings can have multiple benefits across numerous areas, for:

- People – for residents’ health, education, jobs, income and productivity.
- Economy – improved productivity and the potential for the creation of new jobs and new skills as well as reduced pressures on public finances.
- Environment – making a significant contribution to reducing CO₂ emissions.

These are set out in further detail below.

2.2 Benefits for Greater Manchester’s residents

Reducing energy demand through making improvements to a building’s fabric offers substantial health benefits. Homes that are cold and have poor ventilation and internal air quality exacerbate existing conditions (such as respiratory illnesses or mental health conditions), particularly in the young and elderly. For example, research has shown that:

- Excess winter deaths are three times higher in the coldest quarter of homes compared to the warmest quarter⁵. The 2016/17 winter saw 34,300 excess winter deaths across the UK, of which around 30% were estimated to be attributable to living in a cold home⁶.
- Children living in inadequately heated households are twice as likely to suffer from conditions such as asthma and bronchitis as those living in warm homes⁴.
- Those living with a bedroom below 15°C are 50% more likely to suffer from mental conditions such as depression and anxiety than those with a well-heated bedroom.

Alongside health benefits, reducing energy demand can also have economic benefits for individuals and households associated with lower fuel bills (which can potentially be used to contribute to funding building fabric improvements) and greater resilience to future rises in energy prices.

This is of particular importance in Greater Manchester, where it is estimated that 157,000 households (c.13% of all households) are classified as being in fuel poverty – in that they cannot afford to adequately heat their home⁷. Across Greater Manchester’s 10 districts, all except Stockport have fuel poverty rates above the national average (Figure 2). In Manchester, nearly 1 in 5 residents (17.9%) live in fuel poverty. Fuel poverty rates across all 10 districts have increased over the last 3 years. Spatial analysis of fuel poverty across Greater Manchester (see Spatial Energy Plan) in 2016 showed that areas of central Manchester and Fallowfield had the highest density of fuel poverty – areas which also have greater amounts of older housing in poor condition.

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⁵ https://friendsoftheearth.uk/sites/default/files/downloads/cold_homes_health.pdf
⁶ https://www.e3g.org/docs/E3G_NEA_Cold_homes_and_excess_winter_deaths_Press_Release.pdf
As well as the link between energy demand and energy bills, the proportion of household income spent on energy can have knock-on impacts – including on nutrition (e.g. how well a household can afford to eat) and household relationships (e.g. due to the stresses of managing a household’s bills and expenses). Research has shown that energy efficiency improvements can also help improve the equality of opportunities from lower income groups – for example, an energy efficiency programme in New Zealand led to a 21% fall in children’s absence from school over winter months and fewer GP visits.

2.3 Benefits for Greater Manchester’s economy

Investing in reducing energy demand and making buildings more energy efficient can also have significant wider economic benefits. Research in 2014\(^8\) indicated that energy efficiency programmes can have a benefit to cost ratio of 2.27 to 1, representing a potential “high value” infrastructure programme that would also target low income households. A major infrastructure programme, as modelled in this research, would lead to an increase in net employment of around 70,000 new jobs across the UK by 2030. Improvements beyond those underpinning this model are required to achieve Greater Manchester’s ambitions (see section 2.4.2). This will require greater expenditure, potentially reducing that cost-benefit ratio unless further benefits can be quantified. However, this investment would also generate more jobs, with the potential to create 55,000 jobs in Greater Manchester alone.

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\(^8\) https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics
\(^10\) https://www.housingnet.co.uk/pdf/Building-the-Future-Final-report_October-2014_ISSUED.pdf
There are also potential benefits to the wider economy, in terms of reducing the economic losses associated with poor energy efficiency through missed work, missed time at school and lower productivity. Increased energy efficiency can increase social mobility, for example as a result of positive impacts on school attendance and educational attainment, which would have a knock on effect on job and employment prospects of lower income households. In commercial buildings, businesses that lower their energy costs will, by association, be more competitive, productive and profitable. There is also evidence that businesses that are more sustainable are more attractive to potential employees\(^1\) and potentially healthier and therefore more productive workplaces\(^2\). Emerging markets for more energy efficient commercial buildings also present an opportunity for commercial landlords.

Improving energy efficiency can also have positive impacts for public spending. The cost of cold homes to the NHS has been estimated to be between £600m-£2.5bn (depending on the method used\(^3\)), or up 1.7% of total NHS spending (as of 2016/17 figures). Investing £1 in keeping homes warm is estimated to save the NHS £0.42 in direct health costs\(^4\). There is therefore the potential to make significant savings in public health costs if energy efficiency of homes can be improved. This could also extend to other public services, including income support and debt advice, if energy costs decrease. Improving energy efficiency across the public estate offers potential bill savings that could be redirected into public services.

2.4 Benefits for Greater Manchester’s environment

2.4.1 Buildings' energy use and CO\(_2\) emissions

Greater Manchester’s buildings use significant amounts of energy. The types of energy and sectors where it is used is set out in Figure 3.

![Figure 3 – Proportion of energy consumption by sector in Greater Manchester](source: Greater Manchester Spatial Energy Plan)

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This shows that 58% of the energy used in Greater Manchester’s domestic and non-domestic buildings is gas, with electricity providing 32%, and 10% coming from other sources (including coal, bioenergy and energy from waste). Across Greater Manchester’s homes, 73% of energy used is gas for heating (with 95% of Greater Manchester postcodes connected to the gas grid), with a further 24% of energy use being electricity. Coal is used in relatively small proportions (3%) but is higher in certain parts of the city region (most notably in Wigan, where coal accounts for 8% of energy use in homes).

In non-domestic buildings, energy use varies depending on the activities carried out – overall, gas and electricity make up about half each of energy use in non-domestic buildings. Unless action is taken, the predicted growth in Greater Manchester’s population, the planned number of new homes and amount of new commercial floorspace will lead to a 3% increase in energy demand by 2035, arising from heating and electricity use in these new buildings.

The energy used in Greater Manchester’s buildings translates to them being a significant contributor to the city-region’s CO₂ emissions (see Figure 4).

![Figure 4 – Proportion of carbon emissions by sector in Greater Manchester](source: Greater Manchester Spatial Energy Plan)

### 2.4.2 The scale of reductions in CO₂ emissions required

#### 2.4.2.1 The use of models to inform CO₂ reduction pathways

Taking action to reduce buildings’ energy consumption is therefore vital in achieving Greater Manchester’s wider aims for its contribution to global efforts to mitigate climate change. The vision for how the city-region will do this is set out in the 5 Year Environment Plan for Greater Manchester¹⁵ and is supported by a set of aims, including the following for reducing the city-region’s CO₂ emissions:

“For our city-region to be carbon neutral by 2038 and meet carbon budgets that comply with international commitments.”

¹⁵ [https://www.greatermanchester-ca.gov.uk/media/1986/5-year-plan-branded_3.pdf](https://www.greatermanchester-ca.gov.uk/media/1986/5-year-plan-branded_3.pdf)
This aim is based on research\textsuperscript{16} by the Tyndall Centre for Climate Research, which calculated a carbon budget for Greater Manchester that is compatible with the Paris Agreement. During the development of the 5 Year Environment Plan, the GMCA commissioned research using two tools to understand potential CO\textsubscript{2} emission reduction pathways for Greater Manchester to meet this aim. These are as follows:

- Setting City Area Targets and Trajectories for Emissions Reductions (SCATTER)\textsuperscript{17} – this is a model that provides different emission reduction pathways depending on local decisions taken across over 40 different interventions (including on the energy demand of buildings), which can each be implemented to 4 different extents. This allows the tool to be adapted to reflect local circumstances and provides a modelled pathway based on decisions across these interventions.
- Energy System Modelling Environment (ESME) – this model considers the whole UK energy system and models the most cost effective way of Greater Manchester both becoming carbon neutral by 2040 and attempting to minimise emissions prior to then. The model is driven by the target put into it, and will output the most cost-effective way to achieve that.

The graph below (Figure 5) sets out potential carbon reduction pathways for Greater Manchester from the SCATTER model, upon which the actions in the 5 Year Environment Plan is based, against the budget recommended by the Tyndall Centre’s research.

![Figure 5 – Potential Carbon Reduction Pathways for Greater Manchester](Source: Anthesis)

This sets out two scenarios:

- A “SCATTER Level 4” pathway – in which each of the 40+ interventions in the model are pulled to the maximum extent. Under this model, carbon neutrality is possible to achieve but even under this highly ambitious and transformative scenario, emissions


\textsuperscript{17}https://www.anthesisgroup.com/scatter-carbon-footprint-reduction-tool
of nearly 20% above the Tyndall Centre’s recommended budget are produced in Greater Manchester by 2050.

- A “SCATTER GM” pathway – in which each of the 40+ interventions in the model are set according to an estimate of what is currently planned and what might be achievable in the future in Greater Manchester. Under this model, emissions of over double the Tyndall’s recommended budget are produced by 2050 despite it still requiring significant transformative change.

### 2.4.2.2 Using these models to inform the action needed

Underpinning these trajectories, the models show us the scale of change required and an indication of the actions required to achieve these levels of reductions.

The models highlight the importance of the role of the energy used in buildings in achieving emissions reductions. In SCATTER, emissions from both domestic and non-domestic buildings (from both the energy they are supplied with and the amount of energy they are used) each reduce by around 50% by 2025 (on a 2015 baseline) (see Figure 6).

![Figure 6 – Sectors where emission reductions come from (“SCATTER GM” pathway)](source: Anthesis)

In the ESME model, less significant reductions in emissions from buildings are made up to 2030, at which point emissions are reduced dramatically, driven predominantly by the uptake of low carbon heating systems alongside less significant decreases in energy demand than in SCATTER (see Figure 7 below).

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18 Extrapolated to cover 2015-2050 from 2018-2050 in the Tyndall Centre’s original report
Despite differences in the timing and extent of reductions in emissions from buildings, the models are in agreement in the types of actions that are needed in order to realise reductions in emissions. The reductions set out in the SCATTER and ESME models are both based on reducing the demand for energy in buildings through the installation of measures to a building’s fabric to improve thermal performance. Further detail on this is set out below.

a. For domestic properties:

In SCATTER, the model makes assumptions about the level of different insulation measures retrofitted at homes across Greater Manchester by 2040. The table below shows the assumed levels of penetration into Greater Manchester’s homes by 2040 of these measures. This translates into 61,000 homes per year requiring some sort of retrofit (but averaging a 57% decrease in “thermal leakiness” – a measure of heat loss – per house) being carried out in the SCATTER GM pathway.

<table>
<thead>
<tr>
<th>Retrofit Measure</th>
<th>SCATTER L4 Assumption i.e. assumed technical capacity for these measures (% of households by 2040)</th>
<th>SCATTER GM Assumption (% of households by 2040)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Solid wall insulation</td>
<td>28%</td>
<td>24%</td>
</tr>
<tr>
<td>Cavity wall insulation</td>
<td>32%</td>
<td>28%</td>
</tr>
<tr>
<td>Floor insulation</td>
<td>42%</td>
<td>36%</td>
</tr>
</tbody>
</table>
In the ESME model, less ambitious interventions are made in terms of extent (about 60% fewer properties per year than SCATTER) and depth of the measures put in place. In the ESME model, emissions reductions are instead driven to a greater extent by the decarbonisation of energy supply, through the electrification of home heating. This is due to the model implementing the most cost-effective measures at a national or whole system level. The measures chosen by the model is a package that, where appropriate includes, wall insulation, loft insulation, floor edge insulation, draught stripping, single room heat recovery and heating controls. It does not include floor insulation, window replacement and door replacement, which the model does not choose to use due to their cost. This package is expected to deliver on average a 20-30% energy saving.

The models therefore highlight the potential choice to be made between both the number of homes at which improvements are made and the level of the measures to be implemented. However, they both indicate the need for a step change in the extent and level of current uptake of measures.

b. For commercial and public buildings:

The models are more similar in their assumptions about energy demand in commercial and public buildings. Again, the reductions in SCATTER are more significant than in ESME, as set out below.

<table>
<thead>
<tr>
<th>Timeframe</th>
<th>Reduction in heating and cooling demand – SCATTER GM</th>
<th>Reduction in heating and cooling demand – ESME</th>
</tr>
</thead>
<tbody>
<tr>
<td>By 2025</td>
<td>10%</td>
<td>5%</td>
</tr>
<tr>
<td>By 2030</td>
<td>13%</td>
<td>8%</td>
</tr>
<tr>
<td>By 2035</td>
<td>17%</td>
<td>10%</td>
</tr>
<tr>
<td>By 2040</td>
<td>22%</td>
<td>13%</td>
</tr>
</tbody>
</table>

Both ESME and SCATTER model reductions that will be extremely challenging to achieve, requiring unprecedented transformational change and financial investment. Turning these scenarios into reality requires immediate, radical actions over the next 5 years and beyond.

For all building types, the SCATTER GM model highlights the need to act quickly to reduce energy demand in buildings. If there was to be no change in how Greater Manchester’s heat
was supplied (e.g. a shift to electrified heating and/or heat networks or hydrogen ingress into the gas grid) or in its demand over the next 5 years, all other sources of CO₂ emissions (including from private vehicles, buses, industry and freight) would have needed to reduce to zero by 2025 in order for us to reduce emissions in line with the SCATTER GM model.

The models result in different futures for Greater Manchester. ESME would see us more reliant on decarbonisation of the national grid rather than local renewable generation. As set out above, the ESME model also places less reliance on local efforts to reduce demand. It models this approach as the most cost-effective way to reduce emissions, but does not account for the wider benefits to Greater Manchester of greater local renewable energy generation and local reductions in demand. Acting locally to reduce energy demand also provides a low/no regrets way of reducing CO₂ emissions, particularly if efforts to decarbonise the supply of energy (e.g. through local electricity generation or decarbonising heat) fail to deliver on the scale required. Taking this local approach at a city-region scale is supported by the direction of policy in this area at an EU and UK scale.

As it did through its 5-Year Environment Plan, Greater Manchester therefore needs to base its ambitions, approach and targets on the type and scale of action required in the SCATTER model to reduce CO₂ in buildings. The subsequent sections taking domestic properties and then non-domestic properties (commercial and public buildings) in turn are informed by this modelling work.

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3. DOMESTIC PROPERTIES

3.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO?

3.1.1 Priorities for decreasing energy demand in domestic properties

For domestic properties, these challenges and underpinning evidence points to a two-pronged approach to reducing energy demand in Greater Manchester’s homes:

1. **Tackling fuel poverty** through supporting the installation of energy efficiency measures to maximise the co-benefits of more energy efficient, warm and healthy homes for people’s health, well-being and prosperity and for the wider economy.

2. **Delivering the level of energy demand reduction required across all households to meet Greater Manchester’s aims for CO₂ emissions reductions** through upscaling whole-house deeper retrofit of measures (thermal elements, improved air tightness along with the provision of ventilation with heat recovery) to increase energy efficiency to a greater degree (at the property level) and extent (across a wider range of households).

3.1.2 Tackling fuel poverty by reducing energy demand

Given the level and persistence of fuel poverty across households in Greater Manchester and the potential wide range of benefits for people, the economy and environment from tackling it, reducing the number of households in fuel poverty by reducing the energy demand in their homes should remain a key priority. Approaches should focus on prioritising those households that are hardest to engage, taking local approaches to targeting them.

3.1.3 Delivering the level of fabric improvements required across all households to meet Greater Manchester’s aims for CO₂ emissions reductions

The results of both the SCATTER and ESME models set out in section 2.4.2 indicate that a step change in reducing the energy demand of homes is required. However, the interventions in both SCATTER and ESME are indicative of the overall scale of change required, rather than being a prescriptive or transferrable set of interventions required to be put in place across Greater Manchester’s housing stock. The reductions in the SCATTER model therefore need to be translated to a measurable target of space heating demand and CO₂ emissions required at the level of each individual home.

At present, there are measures for the energy efficiency of homes. The most well-known and widespread of these is the Energy Performance Certificate (EPC). EPCs contain information about a property’s energy use and typical energy costs and recommendations about how to reduce energy use and save money. Ratings are required for properties at the point of construction, sale or rent. However, ratings are affected by measures beyond energy demand (e.g. renewable energy generation) and forthcoming changes are planned in the methodology that underpins the ratings. EPC ratings on their own are therefore not particularly useful proxies for energy efficiency; however, the data within them can be

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A minimum EPC E-rating will be required for all privately rented properties from 1 April 2020.
disaggregated and used as part of developing a measurable target of space heating demand and CO2 emissions required at the level of each individual home.

Separately to EPCs, independent standards and methodologies – such as the Passivhaus standard\textsuperscript{21} – have also been developed and implemented, including in properties in Greater Manchester.

Further work is required to develop an appropriate and practicable measure (a space heating demand target) that can inform homeowners and those carrying out works to reduce energy demand in their homes of what needs to be achieved at the level of the individual home to achieve the emissions reductions required and maximise the wider co-benefits of doing so.

3.1.4 Enabling a “just transition”

In focussing on these two areas, it is crucial that this does not lead to a twin-track approach between those able to pay for deeper retrofit measures and those who are either unable to or whose private landlords are unwilling to pay. The focus instead should be on developing approaches that allow deeper retrofit to be extended to those homeowners or tenants who are in fuel poverty or who cannot afford the scale of deep retrofit required. For example, research\textsuperscript{22} – “Finance Models for Retrofit” – highlights the potential financial products that could be used for different people and at different scales (e.g. the use of loans from LAs to fuel poor households for energy efficiency improvements, such as the HELP scheme in Manchester\textsuperscript{23}).

The overall approach could be through initially focussing on social housing providers and their fuel poor tenants, alongside able-to-pay households, in order to develop models to tackle the current barriers to uptake which exist across all households. Reducing energy demand should be part of wider efforts to improve the quality of housing provided by the private rented sector.

3.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS?

3.2.1 Tackling fuel poverty by reducing energy demand

3.2.1.1 Current fuel poverty national policy

Fuel poverty initiatives in Greater Manchester are mainly provided for and funded by the government's Energy Company Obligation (ECO), which places legal obligations on larger energy suppliers to deliver energy efficiency measures to domestic premises of for low income, fuel poor and vulnerable householders. The current programme (2018-2022) has a value of around £840m per year across Great Britain.
3.2.1.2 Local fuel poverty initiatives

Local authorities in Greater Manchester are maximising the amount of funding and support available to fuel poor households. This includes specific programmes, such as the following:

- **Fuel poverty outreach and advice schemes** operating in each borough of Greater Manchester\(^{24}\), providing services to low income and vulnerable households of all tenures. This includes home energy advice visits, income maximisation advice, some simple energy efficiency measures (e.g. draught excluders, LED light bulbs) and referrals for larger energy efficiency measures funded by ECO. Through one of these programmes (the Local Energy Advice Programme – LEAP) operating over 7 Local Authorities, over the 9 months from June 2018 to April 2019, over 1175 households were visited, with total lifetime bill savings of over £1.2 million achieved.

- **Funding under the national Warm Homes Fund scheme.** The Greater Manchester programme under this national scheme is planned to deliver a total of 500 first time central heating systems by autumn 2019. This will reduce bills, increase comfort in non-gas fuel poor households, and improve health outcomes for some of the most severe levels of fuel poverty.

3.2.2 Gaps and issues with the ECO framework

Although these schemes are vital to the residents that benefit from them, further investment to increase their scale and ambition would be required for them to make a significant contribution to Greater Manchester’s aims for reducing its CO\(_2\) emissions.

These obligations are paid for by energy companies via on-bill levies. Given that energy bills account for around 10% of household expenditure for the poorest households and 3% for the richest\(^{25}\), this means that poor households make a greater proportionate contribution than richer households. Fuel-poor are also among the least likely to engage in and benefit from schemes like ECO. Analysis by IPPR\(^{26}\) suggests that elevating all fuel-poor households to government targets of energy efficiency (Energy Performance Certificate Band C) by 2030 will not be achieved until at least 2091 under current rates of installation.

In addition, these measures will not deliver what is required in Greater Manchester to meet its wider ambitions, particularly its aims for CO\(_2\) emissions reductions, given that:

- ECO can only support households in fuel poverty, meaning at least 80% of homes in each district are not eligible.
- The measures currently delivered under ECO, coupled with the government’s level of ambition (fuel poor homes to be EPC rated C by 2030) mean these arrangements will not be sufficient to deliver the scale of reductions in CO\(_2\) emissions in Greater Manchester to meet its aims.

\(^{24}\) Bolton – Care and Repair; Oldham – Warm Homes Oldham; Wigan – AWARM Plus; Bury, Manchester, Rochdale, Salford, Stockport, Tameside, Trafford – Local Energy Advice Programme.

\(^{25}\) http://www.ukerc.ac.uk/publications/funding-a-low-carbon-energy-system.html

Recommendation 1: Partners across Greater Manchester should develop proposals for and push for changes to current the current ECO framework when it ends in 2022 to better align it with the city-region’s ambitions.

GMCA and local authorities are maximising the use of available ECO funding and local flexibilities in Greater Manchester. The GMCA and key partners should develop proposals for changes to ECO from 2022 and work with government on these, including:

- How funding through general taxation rather than energy bills would benefit Greater Manchester residents.
- How ECO could be transformed from a supplier-led scheme to a local area-based scheme in Greater Manchester, supported by appropriate delivery arrangements.
- How this could support ambitions for a whole-house deeper retrofit approach in Greater Manchester and supporting fuel poor households in this – e.g. through being a component of a blended finance approach to funding retrofit.

3.2.1 Delivering the level of fabric improvements required across all households to meet Greater Manchester’s aims for CO₂ emissions reductions

3.2.1.1 Taking a whole-house approach

The evidence provided by the modelling work set out in section 2.4.2 indicates that to achieve the scale of reductions in CO₂ emissions required, a step-change in the extent and depth of the current thermal performance of homes is needed to realise significant reductions in energy demand.

As referred to in section 3.1.3, further work is required to understand:

a) What level of space heating demand is required across Greater Manchester’s different types of domestic properties, based on the SCATTER model.

b) What Greater Manchester’s different types of domestic property can feasibly deliver in terms of space heating demand.

Recommendation 2: Partners across Greater Manchester should carry out further research to identify appropriate space heating demand targets for Greater Manchester property types, informed by the emissions reductions in the SCATTER model. This work would provide a set of indicative targets required from the retrofit of homes to meet Greater Manchester’s ambitions and that can be feasibly delivered at Greater Manchester’s property types.

In order to provide greater clarity on the scale of change in energy efficiency required from existing homes, it is recommended that indicative space heating demand targets (e.g. kWh/m²/year) be developed for Greater Manchester’s domestic properties. This should be based on the reductions set out in the SCATTER model, so that the GMCA and stakeholders can understand how much domestic properties can feasibly contribute to the trajectories for CO₂ emissions reductions in Greater Manchester set out in the model.

This target would need to be developed with the input of stakeholders in Greater Manchester, drawing on existing information within EPCs, data available from Ofgem, existing UK standards, and, potentially, emerging data from smart meters. It would need to be adapted for Greater Manchester and to different archetypes, ages and occupancy levels of properties.
Notwithstanding the issue of understanding what needs to be done at the level of the individual property, the installation rate of insulation measures is estimated to have reduced significantly over the last 5-7 years with significant untapped potential to upgrade existing homes\(^27\). Although national schemes have changed over that period, progress on improving the energy efficiency of buildings has stalled, and installation rates are now 5% of what they were in 2012\(^28\). If Greater Manchester is to meet its aims for reducing its CO\(_2\) emissions, this situation needs to change quickly.

The SCATTER and ESME models provide only a theoretical implementation of measures rather than a practicable way of delivering them. An approach of staged implementation of the insulation measures put in place in the models would lead to incremental improvements in energy efficiency at the expense of holistic whole-house solutions. A whole-property or whole-house approach was a key recommendation in the *Each Home Counts*\(^{29}\) review, commissioned by the government in 2015, and is being developed in standards for domestic retrofit (PAS2035\(^{30}\) standard). Modelling\(^31\) undertaken by the Centre for Sustainable Energy on behalf of the Committee on Climate Change suggests that policy should be designed to incentivise efficient long-term investments, rather than piecemeal or incremental change carried out without it being part of an overall retrofit plan for that home.

Together, this evidence points to the development and support of deeper retrofit through a holistic, whole-house approach – with measures carried out in one go or in stages as part of a property-level plan and including consideration of renewable energy generation and storage opportunities to reduce emissions. This approach also maximises the multiple co-benefits set out in section 2.1, in particular by improving comfort, ventilation and internal air quality, reducing energy bills significantly and reducing maintenance and refurbishment costs in the longer term.

### 3.2.1.2 Examples of whole-house deeper retrofit

To date, whole-house approaches to deeper retrofit of domestic properties have been relatively limited – either in scale (i.e. limited to small numbers of homes) or in the diversity of the sources of funding they have attracted (i.e. relying on public rather than bringing in private investment). This is problematic given the scale of change required in Greater Manchester to deliver its aims for reducing CO\(_2\) emissions and to maximise the co-benefits action on this scale will bring to its economy. Funding this level of change is also potentially more sustainable if a broader range of funding sources can be brought in to finance this investment.

However, several projects have taken or are currently taking place that have been important in demonstrating that levels of space heating demand and CO\(_2\) emissions reductions of the scale needed can be achieved by taking a whole-house approach. In Greater Manchester, several past and current projects\(^32\) have demonstrated that emissions reductions of the scale


\(^{30}\) https://standardsdevelopment.bsigroup.com/projects/2017-04146


required can be made through deeper retrofitting of insulation measures. These have been undertaken using different approaches and therefore at different levels of cost. Other projects across the UK, such as Energiesprong in Nottingham have done likewise – this project is being supported European Regional Development Funding to support the retrofit of 150 homes to an “ultra-low carbon” standard.

3.2.1.3 The current barriers to whole-house deeper retrofit

The barriers to whole-house deeper retrofit, both in Greater Manchester and across the UK, are not technical or geographical, rather scale-up is inhibited by issues of:

- Supply – having a supply chain with sufficient skills and capacity (people) and the right products to deliver the scale required.
- Demand – there being sufficient demand amongst owner-occupiers, social landlords and private landlords so that this scale-up can be realised.
- Intermediary support – stimulating demand, linking that demand with the supply chain in more innovative ways (e.g. through a simplified service offer) and, at the same time, developing financial models and bringing to bear financial products to fund the high up-front capital costs currently associated with whole-house deeper retrofit.

These barriers are illustrated in the diagram below (Figure 8). These align with those set out in the government’s call for evidence (and subsequent responses) on Building a market for energy efficiency33. The section below focusses on those areas where local influence can have the greatest impact. As government develops policy to respond to these barriers, it will be important for Greater Manchester to influence this, as well as adapting its approach in line with any new policy initiatives.

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33 https://www.gov.uk/government/consultations/building-a-market-for-energy-efficiency-call-for-evidence
1. **Demand – influencing the decisions and behaviours of home owners**

The level of works required at properties to deliver whole-house deeper retrofit are invariably more disruptive, complex and expensive to install than basic measures. This approach to and depth of retrofit is not generally considered by most homeowners, even during purchase or when planning significant renovation projects. The challenge of this scale of work is not the technical challenge of the measures installed, but about engaging, encouraging and incentivising tenants and homeowners to install these measures. At the same time, financial products are needed to provide ways of overcoming the high up-front capital costs of works of this scale – estimates generally place the minimum cost at this level of retrofit at around £40,000 per property.\(^\text{34}\)

To do this requires a focus on the key areas below, which are mutually reinforcing rather than things to be seen in isolation. A recent BEIS-funded project\(^\text{35}\) – “People Powered Retrofit” – piloted the creation of a local market for owner occupier retrofit at a neighbourhood scale including service design and delivery, local infrastructural development and supply chain development and quality assurance. The £10.4m Homes as Energy Systems\(^\text{37}\) (HaES) project, part-funded through ERDF, will also help tackle this issue by proving the benefits of energy efficient homes with small scale electricity generation and storage aggregated into virtual network.

\(^{34}\) https://carbon.coop/2017/06/powering-down-together-community-green-deal/
\(^{35}\) https://carbon.coop/2019/06/new-report-advocates-bottom-up-approach-to-retrofit/
\(^{37}\) https://www.procure-plus.com/case-studies/homes-as-energy-systems/
a. **Reducing costs**

Given the current high costs of the measures, focus needs to be placed on minimising costs. This can be tackled in two main ways:

- **At the property level** – taking a whole house approach from the outset, rather than renovations of particular parts of the home (e.g. a bathroom or kitchen renovation) without due consideration of the whole home. This would allow homeowners to take better-informed decisions as well as facilitating the installation of wider measures at reduced cost due to wider enabling activity already being underway. The installation of micro-generation and storage and low carbon heating at the same time as extensive retrofit measures may also help improve cost-effectiveness, by allowing the homeowner to benefit from the Smart Export Guarantee and Renewable Heat Incentive respectively. The aggregating of flexible assets and stored energy at a group of properties could be sold to Distribution System Operator local flexibility markets or balancing markets to further increase revenue to participating homeowners and intermediaries. These issues are covered in more detail in Greater Manchester’s Smart Energy Plan.

- **Across groups of properties** – delivering at scale (across groups of property archetypes), developing packages of related measures, delivering economies of scale (e.g. through bulk purchasing) and upgrading tranches of properties together rather than on an individual basis. To enable this to be achieved, partnerships may be required between the public and private sector to bring together cohorts of properties to be retrofitted as part of a programme.

b. **Making appropriate finance available**

Even after reducing the overall costs, significant up-front capital will be required in order to fund whole-house deeper retrofit. Payback for these measures, in terms of energy bill savings, is likely to be over the long term. Therefore, appropriate finance is required to fund this. An approach that combines investment from the homeowner with public funding and private finance is most likely to be able to deliver these measures at scale.

- **Homeowner investment** – given the scale of up-front capital costs, homeowners are only likely to invest in these measures if they have set aside significant funds for a renovation project or are able to release equity in their properties to fund the improvements (e.g. the HEEPS scheme in Scotland[^38]) or access low interest loans (e.g. the Home Energy Loan Plan scheme in Manchester[^39]).

- **Investment in energy generation and storage** – investment in renewable energy generation, storage and low carbon heating at the same time as carrying out fabric improvements can bring co-benefits (e.g. reduced energy use which in turn is able to be met to a greater extent by renewable energy generated on-site; a better insulated building fabric which in turn makes the operation of a heat pump more efficient; carrying out works to a building’s fabric and heating system at the same time). The Homes as Energy Systems[^40] Project and Heat as a Service model[^41] are both looking

[^40]: [https://www.procure-plus.com/case-studies/homes-as-energy-systems/](https://www.procure-plus.com/case-studies/homes-as-energy-systems/)
at tackling retrofit alongside issues of energy generation and storage and low carbon heating.

- Public funding – there is currently no sufficiently targeted large scale public funding programme for energy efficiency measures of this scale and ambition in England. The Committee on Climate Change’s 2018 report on progress for reducing emissions identifies the absence of concrete national policies to deliver and fund the scale of retrofit needed.

- Private finance – attracting sources of long-term, low cost private finance is key but at present poses a significant challenge due to a number of factors including:
  o The perception of domestic retrofit as complex and risky – which current projects are seeking to overcome (e.g. RetrofitWorks42).
  o The need to have confidence in stable returns before entering the market.
  o The need to overcome barriers through de-risking investment – e.g. by developing a track record in delivery, by attracting subsidies and revenue streams, by providing security (assets, income streams, subsidy) or by underwriting some of the risk.

While there is evidence of interest from institutional investors in retrofit, as yet there is no proven model against which to assign a credit rating and not enough critical mass of activity.

Mechanisms that can clawback the high upfront capital investment, through the recovery of uplifts in rents, value and tax revenue, are those most likely to succeed. This points to equity loans and green mortgages, alongside developing proposals for a revolving loan fund, being the most viable options to be explored further in Greater Manchester, whilst tailoring models to different parts of the market and scale43 and working within government’s policy development in this area44.

Government is also considering the potential use of price signals – which could include fiscal measures linked to EPC ratings – to help drive uptake. There is an opportunity consider how local taxation might be used as part of this approach.

**Recommendation 3:** The GMCA, key partners and investors should work together to develop commercially attractive business models for investment in retrofit of social and private housing. At the same time, GMCA, working with key partners and government (to consider this as part of national policy and green finance initiatives), should develop options for the potential use of council tax as a “nudge” to increase energy efficiency.

The significant up-front capital costs associated with whole-house deeper retrofit, the long-term nature of payback (in terms of energy bill reductions or realising value/rental uplift) and the current lack of proven financial models for providing returns on other benefits (e.g. of improved health) are barriers that need to be overcome in the development of business models that are attractive to investors. Investment will therefore need to come from patient capital, potentially including:

- Equity loans – whether the GMCA or local authorities (or others) would develop an offer to take an equity share in some domestic properties and use that stake to lend money to the property owner for investment in whole-house deeper retrofit. An initiative such as

42 [http://retrofitworks.co.uk/](http://retrofitworks.co.uk/)
this is already available to homeowners in parts of Scotland, run by the Scottish Government\(^{45}\).
- Other forms of loans – whether there the GMCA or local authorities (or others) would establish a programme of loan funding (e.g. a revolving loan fund) to fund whole-house deeper retrofit at a large scale but for multiple recipients (homeowners).
- Green mortgages – whether there are mechanisms that can be implemented locally, alongside the national level actions of lenders and national government, to increase the availability and uptake of green mortgages in Greater Manchester.

As a component of this approach, GMCA and local authorities should, in collaboration with government and key partners, develop an understanding of the potential use of council tax as a means of “nudging” homeowners to make energy efficiency improvements. Implementation of such an approach could strengthen the economic case for homeowners by increasing the potential payoff and decreasing payback times. In developing these proposals, the cost imposed would need to not be excessive but sufficient enough to provide a “nudge,” whilst at the same time not impacting detrimentally on fuel poor households. Changes should also be set in a way that are cost-neutral for local authorities and Greater Manchester council taxpayers as a whole – with the level of discount for more energy efficient properties matching the surcharge against less energy efficient properties. Any proposals should be developed in collaboration with government, who have control over a wider range of fiscal measures available to achieve this (e.g. Stamp Duty).

c. **Increasing awareness of the opportunities of whole-house deeper retrofit**

Awareness amongst homeowners of the opportunities provided by whole-house deeper retrofit needs to be increased. At present, it is not generally part of people’s decision making – this needs to change so that it becomes a natural part of the decision making process at key stages of the homeowner journey, particularly when homeowners are planning significant investment in renovating their home or in purchasing a new property.

Any efforts to increase awareness need to be supported by an understanding of decision-making, including the different contexts for decisions and the different sources of advice drawn upon and trusted (e.g. estate agents, mortgage providers, building firms, DIY chains).

Awareness could be strengthened by using price signals to reduce the purchase or running costs of more energy efficient properties, and/or vice versa for less energy efficient properties. This would provide a “nudge” to property owners to make improvements to their property. At present, there are no national or local benefits or disbenefits for owning, selling or leasing homes of different energy efficiency.

d. **Winning and building trust**

Trust amongst homeowners will need to be built in extensive retrofit measures. There are a variety of potential methods and approaches available to do this. Current projects, including HaES and RetrofitWorks will contribute to this area. Priorities include:

- Agreeing expectations and delivering in line with them – delivering projects as agreed with the homeowner and in line with the expectations set with them prior to the work being carried out. This could be formalised through contracting and guarantees,

particularly guarantees around the energy performance of the building after the works have been carried out.

- Showing the benefits and sharing best practice – communicating the benefits in a clear and meaningful way. This could be accompanied by highlighting and publicising individual success stories (e.g. through retrofit show homes) and aggregating individual, property-level benefits into a set of case studies (e.g. through retrofit show streets). Experience of projects has shown that working with social enterprises and Community Energy groups, who can act as trusted and respected intermediaries for awareness raising and delivery, is important in winning trust for this scale of retrofit.

This points to a broader focus than just traditional marketing campaigns, using community-based social marketing strategies to engage communities themselves in the marketing and delivery of programmes through, for example, community champions, tenant and resident groups and co-operatives.

Accreditation of suppliers and fitters, using robust and effective quality assurance frameworks informed by the PAS2035 standard, would also be a useful tool in this area. This could be formalised within the sector through the development of a local framework of trusted local suppliers, in order to increase confidence and trust in extensive retrofit measures (e.g. the RetrofitWorks project).

More broadly, communications will need to promote the wider case for whole house deeper retrofit, promoting it and its benefits broadly and over the long term, as part of the efforts across Greater Manchester to meet ambitions for reducing CO₂ emissions.

2. Supply – Ensuring the supply chain has the necessary skills and capacity to deliver measures at the necessary scale and quality

At the same time as stimulating and supporting a pipeline of demand, success is equally dependent on ensuring that the supply chain can support demand, building the sector in a sustainable way. Even where homeowners are aware of the opportunity of whole house deeper retrofit for their home, they will likely find it difficult to access advice and suppliers to carry out the work. The supply chain for retrofit will not develop without first seeing, real, evidenced demand emerge.

A systemic, coordinated and planned approach to enabling SME supply chain networks to grow, expand and develop within Greater Manchester is therefore required, which in turn:

- Creates enough certainty and confidence to support and sustain investment in capacity by bringing a sustained and consistent demand over the medium to long term.
- Diversifies and expands existing capacity, enabling the existing contractor base to exploit the high skill, high value, income streams within retrofit services.
- Ensures there is access to high quality products to deliver the standard required.
- Identifies and develops new products and services.

This points to an approach in which clients, who create demand, and suppliers are closely engaged on an ongoing basis, which will require coordination and planning between stakeholders rather than an approach which just leaves the market to develop.

Given the upskilling that whole-house deeper retrofit requires, upskilling and building capacity within the supply chain will be key. Greater Manchester’s workforce requires support to do this by building upon the significant construction and the repair, maintenance
and improvement (RMI) sectors already in place in Greater Manchester, and also in those in site management and coordination roles. There are several themes to this upskilling and capacity building, including a focus on the following:

- **Type of skills** – these will be required across the whole process of delivering retrofit – from surveying and assessment of properties, to design installation, customer care and ongoing maintenance. There is a potential gap in on-site coordination, given the need for different types of work to be carried out at properties at the same time. There is significant potential in training up the existing Refurbishment, Maintenance and Improvement (RMI) sector given its size and scale in Greater Manchester.

- **Quality assurance** – there have been concerns regarding the quality of retrofit carried out in certain cases, with some high-profile examples evident, particularly around dampness caused by the installation of wall insulation. The implementation of PAS2035 for standards in domestic retrofit is expected to lead to change and reduce the rate of failing installations at homes by providing a means of defining good practice standards for domestic retrofit.

- **Engagement with young people and providers** – engagement with Sector Skills Councils, colleges and others will be needed so that this area appeals to a wider range of young people and to ensure a coordinated approach to training. More broadly, to meet its ambitions, Greater Manchester's young people need to be engaged and interested in this area before and as they make choices about their career. Apprenticeships with existing providers and contractors provide an opportunity to do this.

Skills amongst local authority planners are also important. Best practice, such as the implementation of an “Existing Dwellings Policy” for energy efficiency in Stockport\(^{46}\), should be rolled-out and built upon at a Greater Manchester scale.

<table>
<thead>
<tr>
<th>Recommendation 4: The GMCA, learning and skills support agencies, providers, innovation hubs and existing trade bodies should come together to understand the future needs and opportunities presented by whole-house deep retrofit and develop packages of work to tackle the issues this identifies.</th>
</tr>
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<tbody>
<tr>
<td>In addition, this needs to focus on:</td>
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<tr>
<td>- The different roles required, for example, retrofit coordinators, site managers and those carrying out the physical works on properties.</td>
</tr>
<tr>
<td>- How to increase demand for training – through wider efforts to increase demand for retrofit amongst property owners (as above) and considering how to increase demand amongst individuals and businesses working in the construction and RMI sectors.</td>
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</table>

3. **Factors in tailoring the approach to overcoming these barriers**

Approaches to overcome these barriers also needs to take into account the differences between households, in particular in the 3 following areas:

a. **Tenure type** – whether owner-occupied, social landlord or private landlord.

b. **Household type** – key characteristics that may make the household more or less likely to install extensive retrofit.

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\(^{46}\) [https://www.stockport.gov.uk/energy-efficiency-statements/energy-efficiency-information-requirements](https://www.stockport.gov.uk/energy-efficiency-statements/energy-efficiency-information-requirements)
c. Property type – the age and archetype of the property.

This is set out in greater detail below.

a. Tenure type

Each sector of the housing market has different characteristics and will require a different approach to influence the decision making of home owners and tenants, whilst at the same time all contributing together to build up the supply chain (see section 2 below). These differences are due to the different type of incentives to act and the degree to which they impact, which result from the different ways and extent the benefits of retrofit (through uplifted value, reduced energy bills, increased comfort) apply in different tenure arrangements. There are also different national requirements for each sector. These, alongside the particular challenges for each sector, are set out in the table below and expand on the set of challenges in the previous section.

<table>
<thead>
<tr>
<th>Tenure</th>
<th>Particular retrofit challenges</th>
<th>Relevant national policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social housing – 22% of stock</td>
<td>The need for sufficient capital to be available and for social landlords to demonstrate a sufficient return on investment. Implementing different models to allow housing providers to benefit from bill savings (e.g. rent+bills or debt repayment models). The need to consult tenants on improvements and new service charges. Ensuring asset managers and maintenance staff have sufficient awareness and training to ensure retrofit improvements are carried out as part of ongoing maintenance or when properties are vacant. How to apportion costs to right to buy apartment occupiers.</td>
<td>Decent Homes Standard 47 (currently under review and likely to be strengthened) Ambition for EPC Band C for homes in fuel poverty by 2030.</td>
</tr>
<tr>
<td>Private rented – 17% of stock</td>
<td>Some benefits (energy bill savings, increased comfort) accrue to the tenants rather than landlord (uplift in value). Appetite to make longer term investment tends to be limited. Requirement to engage with both tenants and landlords adds complexity and increases drop out. Capacity of Local Authorities to use available enforcement powers effectively. Diversity of sector and large number of small landlords to reach and engage with.</td>
<td>Private Rented Property minimum standard 48 requires any properties rented out to normally have a minimum energy performance rating of EPC Band E (due to be updated in 2019 to introduce the requirement for landlords to contribute to the cost of upgrades).</td>
</tr>
</tbody>
</table>

The owner-occupier sector is the most challenging to tackle – in terms of its scale, age profile of owners and access to finance. Social landlords remain best-placed to build on existing good practice and continue to lead the way on decreasing energy demand across their properties, subject to working with others to tackle the barriers above. This could provide a means of developing the approach and supply chain. Good Landlord Schemes could be used to improve the performance of properties in the private rented sector, particularly if financial incentives/funding tools or easier access to retrofit solutions can be facilitated.

b. Household type

Specifying and typifying the people who commission retrofit in the current market provides evidence on householders most likely to do so. In Greater Manchester, the People Powered Retrofit project used data from existing retrofit clients to examine those most likely to be early adopters of retrofit, who are as follows:

- Civic minded retirees
- Climate pragmatists
- Climate idealists
- Home improvers

This analysis was accompanied by a GIS mapping exercise, carried using a range of data sources to highlight location of those owner occupier householders most likely to take up services. This approach could be used to target future retrofit service offers in Greater Manchester and be built on and added to by others to create a city-region wide resource (e.g. using Mapping GM). This evidence also further justifies the need for wider communications about the benefits of and need to carry out whole house deeper retrofit.
c. Property type

Knowing what needs to be done to each home will be fundamental and is influenced by form, age and location of homes across Greater Manchester. All districts within Greater Manchester have a wide range of property ages, with Manchester and Salford having the greatest proportion of new builds. Figure 9 shows the energy efficiency (in terms of EPC ratings) of Greater Manchester properties by property age.

![Figure 9 – Energy performance (EPC ratings) of Greater Manchester properties by age](image)

Source: Greater Manchester Spatial Energy Plan

Different types of homes will require different packages of measures to be installed – these would best be developed as part of a “pattern book” of best practices, specifications and details that could be shared across the supply chain and updated over time to support its development. Work is already underway in Greater Manchester to develop a pattern book\(^{49}\) of packages of measures, informed by modelling of the most common housing archetypes in the city region and measures that can be applied to them to maximise energy efficiency.

### 3.2.1.4 Tackling the supply and demand side barriers together

At present, there is a lack of coordinated action and support to tackle these barriers together – supporting an increase in awareness and demand among people likely or wanting to retrofit their homes and linking this up with a supply chain of sufficient capacity and capability to deliver whole-house deeper retrofit at the scale needed. A local approach is in line with the direction of government policy in this area, where different local markets and solutions have been tested through 6 pilot projects\(^{50}\) across England (including in Greater Manchester, led by the Carbon Co-op and URBED\(^{51}\)).

Recommendation 5: Partners across Greater Manchester should collaborate to develop a delivery model to build up local markets for whole-house deeper retrofit. This should build on and learn from the findings of recent work in this area, including government funded pilots like People Powered Retrofit and RetrofitWorks, as well as previous programmes like Green Deal Communities.

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\(^{49}\) [https://retrofit.support/](https://retrofit.support/)


There are several demand and supply side issues that need to be tackled together in a coordinated way in order to upscale whole-house deeper retrofit. Tackling these also needs to be supported by a delivery model that can increase demand and match that with a supply chain that has the capacity and capability to meet that demand.

Several projects, including the recently BEIS-funded pilots, have identified the need to develop local delivery models that can:

- Target those most likely to retrofit – identify early adopters and the household and neighbourhood types where these people are most likely to live.
- Build awareness in these neighbourhoods – using tools such as open homes and social marketing and community-based groups to put whole-house deep retrofit on people’s radars and turn awareness into demand.
- Build up the supply chain – improving the capability of the supply chain, providing a means for referring retrofit clients to suppliers.
- Providing a smooth customer journey – providing support to homeowners throughout the process and works in an end to end service.

The following delivery models should be explored as part of this:

- Local authority-led approach, drawing on learning from group work improvements contracts and schemes such as the Home Energy Efficiency Programmes for Scotland (HEEPS).
- The use of a trusted community or co-operative-led intermediary to facilitate works across a collection of homes, tendering packages of homes and building a supply chain, e.g. People Powered Retrofit.
- The use of an Aggregator/Energy Services Company model, combining delivery of retrofit improvements with the installation and management of flexible load technologies and the sale of local flexibility and other grid services, e.g. HaES, OpenDSR
- The development of Pay As You Save owner occupier retrofit service offers.
- The development of social housing-led retrofit investment vehicles or projects to extend in to owner occupier households, broadening the benefit of provider procurement channels.
4. COMMERCIAL BUILDINGS

4.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO?

4.1.1 Priorities for increasing energy efficiency in commercial buildings

For commercial buildings, the challenges and underpinning evidence set out in section 2.4.2 points to the following priority in improving their energy efficiency:

1. Reducing the demand for energy, particularly space heating, in Greater Manchester’s commercial buildings.

In order to do this, action needs to be taken to:

- Increase measurement and reporting of energy use in commercial buildings.
- As a result of that increased measurement and reporting, reduce energy use.

4.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS?

4.2.1 Measuring and reporting on the operational energy performance

Several requirements exist for the measurement and reporting of energy use in commercial buildings, including:

- The Streamlined Energy and Carbon Reporting (SECR)\(^\text{52}\) policy, which requires around 12,000 businesses across the UK (including all quoted companies and “large” unquoted companies) to report on their energy use.
- The Energy Savings Opportunity Scheme (ESOS)\(^\text{53}\) places requirements on businesses to report on energy use, but this is only required of “large” businesses and every 4 years.

However, these requirements are mostly limited to larger companies, meaning that the majority small and medium sized businesses are not legally required to report on their energy use. Although there may be incentives to measure and report (e.g. to target improvement measures or through supply chain requirements), there are also often practical difficulties in doing so, including:

- The ability to measure energy usage – in some buildings, such as commercial office buildings with multiple tenants, metered data is often not available per unit.
- The need to make reporting meaningful – taking raw energy use data and accounting for factors beyond a building’s fabric, including operational hours, type of occupiers and age/type of energy/heating systems to provide a measure of its operational energy performance.

This situation generally means that there is a lack of specific data on the operational energy performance of commercial buildings in the UK, including in Greater Manchester. Action is needed at a national level to address this issue – however, planning policy provides a potential local means of tackling it.


\(^{53}\) [https://www.gov.uk/guidance/energy-savings-opportunity-scheme-eso](https://www.gov.uk/guidance/energy-savings-opportunity-scheme-eso)
Recommendation 6: The GMCA and local authorities should explore the potential for introducing requirements for new developments to report on operational energy performance, and as part of that, on space heating demand.

In order to begin to mainstream the measurement and reporting of operational energy performance, there is a potential opportunity to introduce requirements for new developments through planning policy. For example the New London Plan draft for consultation proposes requirements for major development to monitor and report on energy performance (e.g. through a DEC) for at least 5 years via an online portal. Given the scale of current and planned commercial development in Greater Manchester, this could provide a means of upscaling the amount of commercial floorspace for which operational energy performance is measured and reported which would begin to build this as an approach that could be adopted for existing buildings.

The data currently available and which provides an indication of the energy efficiency of Greater Manchester’s commercial buildings is set out below.

At the building level:

Greater Manchester’s commercial buildings vary significantly in type, use and age – from offices in new blocks or older listed buildings, to factories, warehouses, industrial units and retail and leisure space. The sector is significantly more varied than the domestic stock, where more common archetypes of properties exist.

As with domestic properties, EPCs are available for commercial buildings and are generated when they are constructed, sold or leased. However, in addition to the limitations set out in section 3.1.3, there are additional issues with using them as an indicator of energy efficiency in commercial buildings as they are not representative of how they perform during operation. This varies significantly from the theoretical rating in the EPC and is dependent on how the building is used and occupied.

This lack of data is compounded by a variety of wider factors, including:

- Sparse and inconsistent data about the energy performance of these properties.
- The wide variety of construction methods.
- Multiple uses and constant change of use.
- Absence of price signals or legal requirements to measure or report on the energy efficiency of commercial buildings.
- Metering arrangements, particularly in large, multi-tenanted buildings.

At a spatial level:

At a spatial rather than building level, available evidence points to the areas of the city-region that have the highest commercial heat demand. Figure 10 – a map of commercial heat density across Greater Manchester – shows the highest commercial heat demand is aligned with the density of Greater Manchester’s city and town centres. Manchester city centre and Trafford Park have the largest area of heat density – most areas have heat density of around 100kWh/m², with Manchester city centre’s demand over 140kWh/m². Areas of the highest demand provide the greatest potential for realising the greatest reductions in CO₂ emissions and realisation of co-benefits for productivity.
Figure 10 – Spatial heat demand across Greater Manchester

*Source: Greater Manchester Spatial Energy Plan*

At a sectoral level:

Evidence is also available for the commercial sectors in which heat demand is the highest. Excluding heat used in transport (public buildings), these are as follows:

- Industrial – 25%
- Retail – 25%
- Commercial offices – 12%
- Hotels – 10%

The heat demand under “industrial” above goes beyond that of space heating in buildings and into industrial processes (to be covered in the separate Sustainable Consumption and Production Plan for Greater Manchester). This varies depending on the exact nature of the products and processes involved. Retail, commercial offices and hotels therefore provide the greatest potential for reducing space heating demand in commercial buildings.

### 4.2.2 Reducing energy use by improving operational energy performance

At present, there is no widespread requirement for businesses to improve the operational energy performance of their premises. Incentives do exist, in the form of cost savings in reduced energy bills if these directly benefit the business (i.e. they pay the energy bills directly or, if they do not, savings are passed on through charges from landlords). However, for tenanted commercial property, there is a significant issue over who pays and who sees
the benefit of that investment (e.g. landlords investing in a tenant’s space may not see a
return on that investment if there is not a market for more energy efficient property;
conversely, tenants investing may not be in the space long enough to see a return on that
investment). There is generally an absence of demand for more energy efficient commercial
buildings that would incentivise investment from property owners or occupiers.

Nationally, requirements are in place relating to EPCs which, as set out above, have
limitations in their interpretation as a proxy for operational energy performance. For
businesses that rent their premises from a private landlord and either move premises or
enter into a new tenancy at their existing premises, the landlord cannot be able to rent out a
property with an EPC rating of F or G. From 1 April 2023, this will apply to all properties,
even if businesses have not moved or entered into a new tenancy agreement. This will serve
to increase the theoretical efficiency of Greater Manchester’s rented commercial premises
but will not tackle operational energy performance given the methodology underpinning the
production of an EPC.

4.2.3 Setting a pathway for improving operational energy performance

At present, the measurement, reporting and improvement of operational energy performance
in commercial buildings in Greater Manchester is not sufficiently valued or incentivised in
business’ decision making to achieve the required level of reductions in the CO₂ emissions
associated with their energy use. A phased approach is needed to change this, recognising
that there are limited local levers that can immediately be implemented to change this.

Recommendation 7: Working with key partners, GMCA should develop and implement a
pathway to lead to an increase in the measurement, reporting and improvement of energy
efficiency in commercial buildings, and as part of that, on space heating demand.

The market for more energy efficiency commercial buildings needs to be developed in
Greater Manchester. In the short term, this will need to rely on a voluntary approach but will
require “nudge” incentives/disincentives or legislative requirements to deliver the required
shift. A proposed pathway for achieving this is set out below.

1. Year 1 – Focussing on a voluntary approach and developing policy proposals

   a. Developing a voluntary approach:

   GMCA and partners’ activity should focus in the following areas:

   - **Measurement** – working with businesses to increase uptake of measures of operational
     energy performance. This could use existing methodologies – such as DECs.

   - **Reporting** – working with businesses to report this measurement in a standardised way,
     for example at premises, to customers or clients, through trade bodies (to increase
     scale) or online (e.g. through an online portal).

   - **Improvement** – working with businesses to encourage commitments to improve
     operational energy performance. This could be led by Greater Manchester’s largest
     businesses or most significant emitters of CO₂ and its largest commercial landlords. The
     public sector and large businesses could make commitments to improve the energy
     efficiency of its buildings – for example, setting a date beyond which they will only
     occupy buildings that can meet certain standards of operational energy performance.

   To have the greatest potential impact, these efforts should focus on:
- Those organisations with the greatest CO₂ emissions that arise from the heating of their buildings. This could build on the approach being taken in Manchester by the Manchester Climate Agency to work with 10 organisations responsible for over 20% of CO₂ emissions in Manchester.
- Those areas of the city region with the highest spatial heat demand, drawing on mapping work which identifies the city centre, Trafford Park, Salford Quays and city-region town centres as the most significant areas of emissions.
- Those sectors responsible for the greatest proportion of CO₂ emissions within Greater Manchester – industrial, retail, commercial offices and hotels. Collaboration within key businesses in these sectors (as has occurred in the hospitality sector on single use plastics) could help drive this at scale.

b. Developing policy proposals

At the same time, the GMCA and key partners should develop policy proposals that would support strengthening this approach and move beyond voluntary initiatives alone. As local levers are limited to those areas below, this work should be in collaboration with government policy development on price signals to “nudge” the behaviour of businesses and the energy efficiency of their premises. This work should focus on:

- Developing options for the potential use of business rates as a “nudge” to increase energy efficiency. This could be implemented according to the same principles set out in Recommendation 3.
- Driving change through costing carbon into public procurement.
- The development of more sophisticated standards against which local businesses could measure their operational efficiency. This would not mean the GMCA developing and setting Greater Manchester-only standards, but potentially involve the promotion or adoption of other standards. As an example, this could include positioning Greater Manchester as a potential early adopter or pilot area for the adaptation of the NABERS⁵⁴ standard. This has been developed and implemented in Australia to measure and compare the environmental performance of buildings and tenancies. Alternatively, priority sectors could also be encouraged to develop their own specific standards – e.g. specific measures of the operational efficiency of hotels and retail space.

2. Years 2-3 – Piloting policy proposals, whilst continuing to expand a voluntary approach

Focus will need to switch away from a voluntary approach to piloting the policy proposals set out above. These could be piloted within particular areas of the city region or within particular sectors.

3. Year 4-5: Implementation of policy proposals

Depending on piloting, these proposals could then be rolled out more widely across the city-region.

5. PUBLIC BUILDINGS

5.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO?

5.1.1 Priorities for increasing energy efficiency in commercial buildings

For public buildings, the challenges and underpinning evidence set out in section 2.4.2 points to the following priority in improving their energy efficiency:

1. Reducing the demand for space heating in Greater Manchester’s public buildings.

5.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED OVER THE NEXT 5 YEARS?

5.2.1 Measuring and reporting on the operational energy performance of public buildings

Like Greater Manchester’s commercial buildings, its public buildings also vary. However, they can be more easily segmented into key categories allowing a degree of comparison within these groups. The most significant of these are as follows:

- Schools (maintained schools and academies)
- Further education and higher education institutes
- Emergency services (fire and police)
- Hospitals and health care facilities (NHS)
- Leisure facilities (e.g. sports centres)
- Cultural facilities (e.g. museums and libraries)
- Offices

More information is available regarding the operational energy performance of public buildings than it is for commercial buildings. Public buildings with a total useful floor area over 250m² and which are frequently visited by the public are required to obtain and display a Display Energy Certificate (DEC) at the building. DECs provide an energy rating of the building from A (most efficient) to G (least efficient) and are accompanied by a valid advisory report, containing recommendations for improving the energy performance of the building.

Where the building has a total useful floor area of more than 1000m², the DEC is valid for 12 months and the accompanying advisory report is valid for seven years. Where the building has a total useful floor area of between 250m² and 1000m², the DEC and advisory report are valid for 10 years. DECs therefore provide a more up to date assessment of the energy performance of larger public buildings – those for smaller public buildings are more likely to be out of date (and could be out of date by as much as a decade).

At present, the best available data on DECs is that accessible online through government datasets55. This has some limitations in that the data is out of date (currently by 2 years) and DECs are broader measures of a building’s energy use, rather than just its energy efficiency.

55 https://data.gov.uk/dataset/e7868e93-3cc5-4eb5-80ff-139001504219/display-energy-certificate-data
Recommendation 8: The GMCA, local authorities and the public sector across Greater Manchester should ensure standardised measurement and annual reporting (as part of reporting against the 5 Year Environment Plan) on the energy efficiency of their buildings, including their Display Energy Certificate ratings and a measure of space heating demand.

The public sector in Greater Manchester (particularly the GMCA, local authorities and the organisations within the Greater Manchester Health and Social Care Partnership) should work together to tackle the following in this area, which will bring the following benefits:

- Increasing capacity – to overcome the issue of a lack of capacity, particularly within Local Authorities, to dedicate to this issue.
- Sharing expertise – different organisations are likely to bring different areas of expertise to tackling this issue.
- Efficiencies of scale – there are likely to be efficiencies in improving energy efficiency across a larger estate.

5.2.2 Improving the efficiency of Greater Manchester’s existing public buildings

At present, there is no requirement for the public sector to improve the operational efficiency of the premises they own and/or occupy. Incentives do exist, in the form of cost savings in reduced energy bills if these directly benefit the organisation (i.e. they pay the energy bills directly or, if they do not, savings are passed on through charges from landlords).

Nationally, requirements are in place relating to EPCs which, for non-domestic buildings, are indicators of the theoretical efficiency of a building rather than in use. For public sector organisations that rent premises from a private landlord and either move premises or enter into a new tenancy at their existing premises, the landlord will not be able to rent out a property with an EPC rating of F or G. From 1 April 2023, this will apply to all properties, even if businesses have not moved or entered into a new tenancy agreement. As with commercial buildings, this will serve to increase the theoretical efficiency of Greater Manchester’s rented public buildings but will not tackle operational efficiency.

Recommendation 9: The GMCA and local authorities should work to deliver agreed targets for the energy efficiency of their buildings, including their Display Energy Certificate ratings and developing a measure and targets for space heating demand, and encourage other public sector organisations to do likewise.

The Greater Manchester 5 Year Environment Plan sets out a target for average DEC ratings to achieve across GMCA and local authority buildings by 2024, where economically viable. This could be expanded, including a commitment to end leases of buildings that do not meet this target (where economically viable and where leases allow).

As well as wider reporting, Greater Manchester’s public sector organisations should also commit to meeting and reporting annually against the government’s voluntary targets on carbon emissions reductions (30% by 2020/21 on a 2009/10 baseline56) and any subsequent target set after that. Although this encompasses activities beyond the energy used to heat public buildings, this should be a focus for action.

6. BRINGING IT TOGETHER

6.1 WHERE DOES GREATER MANCHESTER NEED TO GET TO?

6.1.1 Mission-oriented approach

The 5 Year Environment Plan for Greater Manchester sets out the scale of the challenge in achieving the CO₂ emissions reductions required to meet its international climate change obligations, of which increasing building energy efficiency is an integral part. In order to deliver its environmental vision and aims the plan sets out and to close the gap between what is needed and where Greater Manchester is now. To do that in points to taking new and different approaches in the following areas:

- Supporting innovation
- Finance and funding
- Building partnerships between the public, private and voluntary, community and social enterprise organisations
- Showing leadership
- Engaging and educating residents, communities and businesses
- Upskilling its workforce

In this report, these themes are key to tackling the challenges associated with decarbonising Greater Manchester’s buildings and have been covered in various sections and recommendations.

To bring all these areas together and effectively implement its aims, the 5 Year Environment Plan sets out the desire to establish a mission-oriented approach to tackling Greater Manchester’s environmental challenges. This approach involves defining a challenge and then uses this to create an ambitious goal and create a long-term policy landscape, setting out tasks that mobilise various actors to come together in new ways, rather than within traditional sectors or groups. This points to establishing new ways of working within Greater Manchester – across the public, private and voluntary, community and social enterprise sectors – to achieve the aims set out in the 5 Year Plan and in implementing the recommendations in this report.

6.2 WHERE IS GREATER MANCHESTER NOW AND WHAT ACTION IS NEEDED?

6.2.1 The roles of different organisations within Greater Manchester

No single organisation in Greater Manchester can tackle the priorities and implement the recommendations in this report alone. Doing so requires joint working across different types of organisations and sectors, which should build upon the strength of existing partnerships in Greater Manchester. These have been developed strategically, for example in the lead up to the 2018 and 2019 Green Summits and in the development of the 5 Year Environment Plan, and around particular projects, for example the Homes as Energy Systems ERDF-funded project. Each sector brings different abilities and expertise – these are set out below:

- GMCA and Local Authorities – providing the right policy framework, including setting ambition and direction, providing evidence to inform action and implementing policy where levers are held locally (e.g. local taxation, planning policy); convening key stakeholders and engaging more widely across Greater Manchester.
- Wider public sector – leading by example in areas where organisations (GMCA, Local Authorities, health, national government etc) have direct operation and financial control (e.g. assets, procurement).
- Community, voluntary and campaign sector groups – building greater public understanding and awareness of energy efficiency and low carbon buildings. There is the potential to participate in broad information campaigns and in more innovative community-based social marketing activity and to act as trusted advisors and advocates, signposting opportunities and sources of information.
- Social Enterprises and co-operatives – developing the sector through trading activity that brings wider social and environmental benefits in areas, activities include supply chain training schemes that offer a route in to work for marginalised elements of the workforce or the co-design of new retrofit service delivery models.
- Businesses (within the sector) – offering apprenticeships and training schemes as a route into work for new entrants, carrying out innovative research and development, developing new supply chains and business diversification
- Businesses (all) – raising awareness and offering incentives/schemes for domestic retrofit amongst their employees.

6.2.2 Building on existing partnerships to work together in new ways

GMCA and key partners need to build on this foundation and move to focus on delivery against the priorities set out in the 5 Year Environment Plan and within this report. This should be done in a way that reflects the ambition for a mission-oriented approach and links to other Greater Manchester strategies, particularly the Local Industrial Strategy and Infrastructure Framework.

Recommendation 10: The GMCA should put in place a Greater Manchester Low Carbon Buildings Challenge Group, which, through establishing specific task and finish groups, would provide cross-sector approach to tackling the systemic challenges associated with retrofit across all building types. The GMCA should put in place a Greater Manchester Low Carbon Buildings Challenge Group, which, through establishing specific task and finish groups, would provide cross-sector approach to tackling the systemic challenges associated with retrofit across all building types.

The following section (including Figure 11) sets out a proposed structure for how a Retrofit Challenge Group would work. These areas are discussed in further detail below.
The Retrofit Challenge Group should be responsible for driving progress towards the ambitions for buildings set out in this report and the 5 Year Environment Plan. In order to do this across the aims of the 5 Year Environment Plan through a mission-oriented approach, the Greater Manchester Combined Authority put in place new arrangements for how the implementation and delivery of the 5 Year Environment Plan is governed and progressed. This is being implemented in a way that reflects the interdependencies between different areas. For decarbonising buildings, this will include looking at reducing energy demand, decarbonising energy supply and decarbonising travel (through supporting electric vehicle roll-out) at the level of domestic, commercial and public buildings.

In line with the mission-oriented approach set out in the 5-Year Environment Plan, it is recommended that the Retrofit Challenge Group and Task and Finish Groups beneath it are:

- Action-focussed – focussed on implementation and delivery, driving forward the recommendations in this report rather than focussing on or discussing issues or barriers.
- Agile – should not necessarily be long-standing and should be able to change their remit and focus to ensure the most significant issues are prioritised given limited resources.
- Cross-sectoral – approaching issues in a way that allows for them to be tackled bottom-up most effectively rather than on traditional top-down sectoral lines

Given the different issues that need to be tackled in different building types set out in this report, different approaches and actions will be required for each. Even within these building types, different approaches may be required for:

- Domestic properties – social housing, the private rented sector and owner occupiers.
- Commercial properties – offices, retail, tourism/leisure.
- Public buildings – schools, healthcare.
The structure proposed above should allow for actions and experience to be shared across building types depending on relative priorities and cross-over. The list below sets out an initial set of potential areas of cross-over between building types:

- Communications and marketing – raising increasing awareness among key groups (e.g. home owners, SMEs, commercial landlords, public estates managers).
- Standards, measurement and performance – refining the standards that retrofit across building types can feasibly meet in order to meet Greater Manchester’s ambitions and measuring and reporting on progress and performance to meeting these.
- Policy, implementation, research – developing local policy initiatives and working with national government where it holds the relevant levers; implementation through training, pilots, campaigns; further developing the evidence base, through commissioning research and bringing this together (e.g. on Mapping GM).
- Finance – developing proposals and models for financing retrofit, including liaising with potential investors on financial products.
- Skills and sector development – engaging with providers and other stakeholders within the education system to promote the sector, whilst also working with the sector and supply chain to identify issues and barriers.

### 6.2.3 Next steps

Working across organisations in the way set out above offers the potential for stakeholders to come together in new ways to deliver on the ambitions for low carbon buildings set out in this report and the 5 Year Environment Plan for Greater Manchester. The Retrofit Challenge Group should be established as soon as possible to drive action in this area forward. Within that, tackling the key barriers to domestic retrofit and developing innovative public, private and third sector partnerships to do that should be the key priority.
PURPOSE OF REPORT
To update the GMCA on the consultation on the 2019 Revised Draft of the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF)

RECOMMENDATIONS:

The GMCA is requested to:

1. Delegate authority to the GMCA Chief Executive tin consultation with the Portfolio Lead for Housing, Homelessness and Infrastructure to publish the report on the Summary of Consultation Responses to Revised Draft GMSF 2019 (as set out in Section 2).

2. Agree to the publication of the consultation responses as set out in the report (Section 2).

3. Agree the proposed timetable for consultation on the Further Revised Draft of the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF) (Section 4).

CONTACT OFFICERS:

Anne Morgan, Head of Planning Strategy
(anne.morgan@greatermanchester-ca.gov.uk)
**BACKGROUND PAPERS:**

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<td>Overview &amp; Scrutiny Committee</td>
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1. **BACKGROUND**

1.1 Consultation on the Revised Draft of the Greater Manchester Plan for Homes, Jobs and the Environment (Greater Manchester Spatial Framework) took place between January and March this year.

1.2 Over 17,500 individuals and organisations responded and more than 67,000 comments were made to the consultation. These have been loaded onto the consultation portal and analysed.

1.3 Appendix 1 sets out the number of responses received by policy area.

2. **CONSULTATION SUMMARY REPORT**

2.1 A Consultation Summary report will be published following the GMCA meeting. The responses have been analysed by thematic policy area and key issues identified which will need to be considered during the preparation of the next version of the plan.

2.2 These key issues will inform the further evidence work that needs to be undertaken and also the engagement strategy over the coming months. A Consultation Final Report will be produced with the next Draft GMSF which will outline how these issues have been considered and how the plan has been changed as a result of comments made, or why some comments have not resulted in changes. It is not intended to respond in detail to every comment made.

2.3 The Consultation Summary report sets out the key issues in more detail and it is important to understand the range of issues and the inter-relationship between issues.

2.4 In general the overall approach of the plan - to concentrate development in the most sustainable locations, increase density of development, move to carbon neutral living, make an explicit commitment to more affordable housing, provide stronger protection for valuable green spaces - was supported. Concerns were raised however that the thematic policies were undermined by the proposed allocation policies, or that the implications of the thematic policies threatened the viability of sites.

2.5 There was a lot of responses around the approach in the plan to meeting Local Housing Need. Many resident/community organisations were of the view that the standard methodology was flawed and should not be used, and that Greater Manchester should not seek to meet Local Housing need if this necessitated Green Belt release. Alternatively, others, notably the development industry were of the view that the Local Housing need methodology was the ‘starting point’ for the plan and was a minimum which should be increased to match the aspirations for economic growth.
2.6 Several issues were raised by a cross section of respondents. The list below outlines the issues which have generated significant responses (this is not an exhaustive list). Given the importance of the plan to the range of communities, organisations and interests across Greater Manchester it is not surprising that the comments received in relation to these issues are often divergent.

- Scale of Greater Manchester’s ambition – for both employment and homes.
- Credibility of evidence base – Local Housing Need Methodology, economic forecasts in period of uncertainty
- Brownfield preference/viability of the baseline land supply
- Green Belt release
- Sustainability/viability of proposals in the plan – carbon, transport
- Infrastructure required to support scale and pattern of growth – and funding to deliver this

2.7 The proposed site allocation policies generated a significant number of responses with most focusing on loss of Green Belt, concern over impact on existing transport networks and pressure on social infrastructure.

2.8 It is proposed to publish the Consultation Summary report and the consultation responses shortly after the GMCA meeting. Respondents will be able to check that their response has been captured accurately and also see what other respondents have submitted.

2.9 Work is already underway on a range of evidence studies to respond to the consultation and inform the next version of the plan. The two critical studies that are underway are around transport and viability, although other key work on flood risk, carbon and energy, heritage and green infrastructure is also ongoing. It is proposed that this work is shared more widely with stakeholders as the next plan is being developed to widen engagement. Further work is planned looking at demographics (including new national population and households projections statistics expected in 2020) and economic forecasting, when there is greater certainty around the position in relation to Britain’s exit from the European Union.

2.10 The GMSF is of course only one of the strategic documents that the GMCA is producing to deliver the vision set out on the Greater Manchester Strategy. Further work on GMSF is being co-ordinated with the development of the Local Industrial Strategy, the Greater Manchester Infrastructure Framework, Transport 2040 and the Housing Strategy.

3. SPATIAL DEVELOPMENT STRATEGY

3.1 Through the 2014 Devolution Agreement the Mayor has a duty to produce a Spatial Development Strategy (SDS), building on work carried out for the GMSF. The key drivers behind a joint plan are to support our inclusive growth ambitions by focusing
development in the most sustainable locations, particularly our Town Centres, providing infrastructure in a timely fashion and minimising the need to release Green Belt land. A joint plan also allows for a consistent policy framework for all 10 districts, addressing strategic issues such as affordable housing, flood risk, fracking and green infrastructure whilst leaving the detail to be determined at local level.

3.2 The SDS Regulations as currently drafted allow for strategic allocations but not strategic designations. Notwithstanding the efforts that are being made to focus development in the urban area, GMCA has always been clear that in order to meet its Local Housing Need it requires the option to allocate land in the Green Belt and to designate any resultant ‘new’ Green Belt boundary. Government is currently considering the request from Greater Manchester to amend the Spatial Development Regulations (SDS) to allow the GMSF to be progressed as an SDS. If Government is minded to make the minor amendment required, it is uncertain what the timescale for this will be.

3.3 In coming to a decision on the regulations Government has asked for reassurances around local engagement and consultation on the next GMSF. GMCA has provided a response to Government around how we will engage residents, developers and others in the preparation of the next GMSF and also the way in which we will consult on the next version of the plan.

3.4 The next GMSF will be produced as an SDS if the regulations are in place, otherwise it will continue as a Joint Development Plan Document (DPD). Although not required by the SDS legislation, GMCA will prepare a 'Consultation Statement' setting out how we will communicate with our stakeholders in the future. Workshop sessions have been held with some key stakeholders to begin this process and it is intended that engagement will continue as the Statement is developed.

3.5 Alongside this Greater Manchester has committed to a greater degree of engagement in the development of the next plan. This has begun with workshops with community groups exploring how the last consultation was received and what can be done to improve this.

3.6 Commitment has already been made to engage with community groups, the voluntary and community sector and the development industry on the development of the evidence base and workshop sessions will be held over the autumn and early into the New Year to shape the studies and share the methodologies.

3.7 One of the key elements raised particularly by residents and community groups was the need to make sure that the contribution of brownfield land is maximised. A 'Town Centre/Urban Living' campaign is proposed to showcase the work already underway to address the challenges facing our town centres because of changing consumer behavior. A new approach, as set out in the Town Centre Challenge is needed to re-purpose our town centres, creating new residential neighbourhoods by promoting higher density development which is well served by good public
transport. This will enable people to access the facilities and services they need by walking and cycling. The Town Centre Challenge and other works across the districts recognise the importance of heritage, history and people of our townships and the role which culture, arts, creativity, and, leisure, can play. The campaign will highlight some of the successes, for example the recent designation of the first town centre Mayoral Development Corporation in Stockport as well as the new urban neighbourhoods being developed in the heart of the conurbation but also highlighting some of the challenges faced (viability, Benefit Cost Ratio issues) and the support needed from Government to achieve real transformation across the whole of Greater Manchester.

3.8 Detail around further devolution in respect of the rail network and railway stations recently announced by the Prime Minister, needs to be understood and factored into any future spatial strategy as appropriate.

4. **TIMETABLE**

4.1 It is recommended that in order to allow time for Government to amend the SDS regulations, engage more fully with residents and other interested parties, and undertake a 12 week consultation, the timetable for the next consultation is moved to Summer 2020.

4.2 If the plan is to be an SDS, all 10 districts will seek full council approval through June and July with the GMCA agreeing the plan at the end of July for a 12 week consultation. Arrangements are slightly different (GMCA/AGMA Joint Board will commend the draft for district council approval) and may take a little longer if the document continues to be progressed as a Development Plan Document but consultation would begin by August at the latest.

4.3 The new timetable (for either an SDS or a DPD) would look as follows:

<table>
<thead>
<tr>
<th>Programme of engagement around evidence (for example transport, affordable housing, viability)</th>
<th>October 2019 – March 2020</th>
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</thead>
<tbody>
<tr>
<td>Town Centre/Urban Living/Affordable Housing campaigns</td>
<td>October 2019 – January 2020</td>
</tr>
<tr>
<td>District approvals</td>
<td>June/July 2020</td>
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<tr>
<td>GMCA approval</td>
<td>July 2020</td>
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<tr>
<td>Public Participation (12 weeks)</td>
<td>July 2020</td>
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<tr>
<td>Submission</td>
<td>Dec 2020/Jan 2021</td>
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<tr>
<td>Examination</td>
<td>May – October 2021</td>
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<tr>
<td>Publication (adoption)</td>
<td>December 2021</td>
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5. **RECOMMENDATIONS**

5.1 Recommendations are found at the beginning of the report.
Consultation responses

Thematic policies

Context comments
Our strategic objectives
Our spatial strategy
Core Growth Area
City Centre
The Quays
Port Salford
Inner Areas
Northern Areas
M62 North-East Corridor
Wigan-Bolton Growth Corridor
Southern Areas
Manchester Airport
New Carrington
Main town centres
Strategic green infrastructure
A sustainable and integrated transport network
Sustainable development
Carbon and energy
Heat and energy networks
Resilience
Flood risk and the water environment
Clean air
Resource efficiency
Context comments
Supporting long-term economic growth
Employment sites and premises
Office development
Industry and warehousing development
Prosperous Greater Manchester - Context comments
Scale of new housing development - scale of housing
Affordability of new housing - affordability housing
Type, size and design of new housing
Density of new housing
Homes for Greater Manchester - Context comments
Valuing important landscapes
Green infrastructure network
River valleys and waterways
Lowland wetlands and mosslands
Uplands
Urban green space
Trees and woodland
Green infrastructure opportunity areas
Standards for a Greener Greater Manchester
A Net Enhancement of Biodiversity and Geodiversity
The Greater Manchester Green Belt
Greener Greater Manchester - context comments
Sustainable places
Heritage
New retail and leisure uses in town centres
Education, skills and knowledge
Health
Sport and recreation
Greater Manchester for everyone - Context comments
World-class connectivity
Digital connectivity
Walking and cycling network
Public transport network
Transport requirements of new developments
Highway infrastructure improvements
Freight and logistics
Streets For All
Connected Greater Manchester - Context comments
Infrastructure implementation
Developer contributions

Allocation policies

Bury / Rochdale - GM Allocation 1: Northern Gateway
GM Allocation 1.1
Heywood / Pilsworth (Northern Gateway)
GM Allocation 1.2: Simister and Bowlee (Northern Gateway)
GM Allocation 1.3: Whitefield (Northern Gateway)
Oldham / Rochdale - GM Allocation 2: Stakehill
Oldham / Rochdale GM Allocation 3: Kingsway South
Bolton - GM Allocation 4: Bewshield Farm
Bolton - GM Allocation 5: Chequerbent North
Bolton - GM Allocation 6: West of Wingates / M61 Junction 6
Overall proposals for Bolton - Context comments
Bury - GM Allocation 7: Elton Reservoir Area
Bury - GM Allocation 8: Seedfield
Bury - GM Allocation 9: Walshaw
Overall proposals for Bury - Context comments
Manchester - GM Allocation 10: Global Logistics 80
Manchester - GM Allocation 11: Roundthorn Medipark Extension 70
Manchester - GM Allocation 12: Southwick Park 55
Overall proposals for Manchester - Context comments 83
Oldham - GM Allocation 13: Ashton Road Corridor 238
Oldham - GM Allocation 14: Beal Valley 1489
Oldham - GM Allocation 15: Broadbent Moss 144
Oldham - GM Allocation 16: Cowlishaw 1436
Oldham - GM Allocation 17: Hanging Chadder 1317
Oldham - GM Allocation 18: Robert Fletchers 316
Oldham - GM Allocation 19: South of Rosary Road 102
Oldham - GM Allocation 20: Spinners Way/ Alderney Farm 96
Oldham - GM Allocation 21: Thornham Old Road 2145
Oldham - GM Allocation 22: Woodhouses 574
Overall proposals for Oldham - Context comments 251
Rochdale - GM Allocation 23: Bamford/ Norden 409
Rochdale - GM Allocation 24: Castleton Sidings 101
Rochdale - GM Allocation 25: Crimble Mill - Please explain your answer 195
Rochdale - GM Allocation 26: Land North of Smithy Bridge 597
Rochdale - GM Allocation 27: Newhey Quarry 449
Rochdale - GM Allocation 28: Roch Valley 451
Rochdale - GM Allocation 29: Trows Farm 281
Overall proposals for Rochdale - Context comments 443
Salford - GM Allocation 30: Land at Hazelhurst Farm 201
Salford - GM Allocation 31: East of Boothstown 225
Salford: GM Allocation 32 - North of Irlam Station 1419
Salford - GM Allocation 33: Port Salford Extension 146
Overall proposals for Salford - Context comments 99
Stockport - GM Allocation 34: Bredbury Park Extension 625
Stockport - GM Allocation 35: Former Offerton High School 271
Stockport - GM Allocation 36: Gravel Bank Road / Unity Mill 448
Stockport - GM Allocation 37: Heald Green 456
Stockport - GM Allocation 38: High Lane 895
Stockport - GM Allocation 39: Hyde Bank Meadows 364
Stockport - GM Allocation 40: Griffin Farm, Stanley Green 330
Stockport - GM Allocation 41: Woodford Aerodrome 214
Overall proposals for Stockport - Context comments 277
Tameside - GM Allocation 42: Ashton Moss West 226
Tameside - GM Allocation 43: Godley Green Garden Village 1095
Tameside - GM Allocation 44: South of Hyde 1805
Overall proposals for Tameside, - Context comments 361
Trafford - GM Allocation 45: New Carrington 738
Trafford - GM Allocation 46: Timperley Wedge 942
Overall proposals for Trafford - Context comments 259
Wigan - GM Allocation 47: Land South of Pennington 182
Wigan - GM Allocation 48: M6 J25 607
Wigan - GM Allocation 49: North of Mosley Common 147
Wigan - GM Allocation 50: Pocket Nook 350
Wigan - GM Allocation 51: West of Gibfield 68
Overall proposals for Wigan - Context comments 121
Overall proposals for Greater Manchester as a whole - Context comments 871
PURPOSE OF REPORT

To provide an update on the establishment and progress to date of the Stockport Town Centre West Mayoral Development Corporation. To seek approval from the GMCA of the Stockport Town Centre West Mayoral Development Corporation’s Strategic Business Plan September 2019 - March 2020.

RECOMMENDATIONS:

The Greater Manchester Combined Authority is requested to:

1. Note the progress to date and that the inaugural meeting of the board took place on 9th September 2019 during which the Mayor appointed members to an initial board and appointed the first Chief Executive on an interim basis.

2. To approve the Stockport Town Centre West Mayoral Development Corporation’s Strategic Business Plan September 2019 – March 2020

CONTACT OFFICERS:

Simon Nokes, Executive Director of Policy & Strategy
Simon.nokes@greatermanchester-ca.gov.uk

Anne Morgan, Head of Planning Strategy
(anne.morgan@greatermanchester-ca.gov.uk)

David Hodcroft, Principal, Planning Strategy
(david.hodcroft@greatermanchester-ca.gov.uk)

• Risk Management – [see paragraph 1.2]
• Legal Considerations –
• Financial Consequences – [Revenue – see paragraph 1.2 and 2.6]
• Financial Consequences – [Capital – see paragraph 2.5]
• Number of attachments included in the report – 1

BACKGROUND PAPERS:

**Town Centre Challenge Report to GMCA on 26 January 2018**

**Town Centre Challenge Report to GMCA on 28 September 2018**

**Stockport Council Cabinet Report on the Creation of a Mayoral Development Corporation in Stockport’s Town Centre West – December 18 2018**

**Stockport Mayoral Development Corporation Report to the Joint AGMA/GMCA Board on 11 January 2019**

**Town Centre Challenge: Stockport Mayoral Development Corporation to the GMCA on 29 March 2019**

**Stockport Council Report to the Corporate, Resource Management & Governance Scrutiny Committee on the 6 August 2019**

**The Stockport Town Centre West Mayoral Development Corporation (Establishment) Order 2019 (S.I. 2019/1040)**

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1. **BACKGROUND**

1.1 On 28 September 2018 the GMCA agreed to support, in principle, the creation of a Mayoral Development Corporation (Corporation) in Stockport to help secure the regeneration of the Town Centre West area of Stockport. This agreement in principle was subject to further work being undertaken by Stockport Council in relation to the proposals.

1.2 On 11 January 2019 the GMCA agreed a draft set of principles to be used for any proposed Corporation to be set up in the Greater Manchester area (GM Corporation Principles).

1.3 A formal consultation was held between January and March 2019 in respect of the proposals relating to the creation of a Corporation in the Stockport Town Centre West area to support the delivery of approximately 3,000 new homes along with complementary mixed use development and supporting social infrastructure, open space, and amenity. The consultation received a positive overall response.

1.4 In accordance with legislation the Greater Manchester Mayor (Mayor) was able to designate the Stockport town centre west area of land as a Mayoral development area following:
   - the positive outcome of the consultation exercise;
   - the expiration of the consideration period where the GMCA has not rejected the proposals; and
   - the consent of the member of the GMCA appointed by Stockport Council being given.

1.5 The Mayor then publicised the designation and notified the Secretary of State of the designation and of the name to be given to the Corporation as ‘Stockport Town Centre West Mayoral Development Corporation’ (Stockport Corporation).

1.6 The Stockport Corporation was established under legislation on 2 September 2019 and is the first Corporation in the Greater Manchester area.

1.7 Over recent months, the Mayor and GMCA officers have been working closely with Stockport Council and Homes England on plans to accelerate the pace and scale of regeneration in the Stockport town centre west area through the creation of the Stockport Corporation. The first meeting of the Stockport Corporation occurred on the 9 September 2019.

2. **BOARD MEMBERSHIP OF THE STOCKPORT CORPORATION**

2.1 The Stockport Corporation is a ‘body corporate’ governed by a board of Members (the Board) appointed by the Mayor (in consultation with the Leader of Stockport Council).

2.2 The operating model prepared for the Stockport Corporation has been informed by the GM Corporation Principles. The membership of the Board will reflect the cross party political composition of Stockport Council and be a balance of public sector representation with specialist private sector regeneration expertise to ensure the Board has appropriate oversight by
democratically accountable board members alongside the delivery capacity the Stockport Corporation will need.

2.3 For the first six months an initial Board will be put in place and following this permanent appointments to the Board will be made. This will include the appointment of a number of private sector board members with appropriate credibility and prominence. Recruitment of such representatives will take place over autumn and winter 19/20 with a view to having all Board members in place for spring 2020. It is the intention that one of the private sector Board members will Chair the Corporation.

2.4 The initial Board is proposed as follows:

- The GM Mayor to be Chair of the Board;
- One representative of Homes England;
- One representative of the GMCA;
- Three elected representatives of Stockport Council (from the largest political groups); and
- The Chief Executive of Stockport Council.

3. GOVERNANCE ARRANGEMENTS

3.1 The Stockport Corporation will have its own constitution and it was adopted at its inaugural meeting on 9th September 2019. The constitution sets out the functions and responsibilities of the Board and Chief Officers. It also sets out where the GM Mayor’s or GMCA’s consent or approval is required in respect of certain decision making.

3.2 The Stockport Corporation will adhere to the GM Corporation Principles as set out in the 11 January 2019 report, namely:

- An assumption that planning powers remain with Stockport Council;
- A commitment from Stockport Council as the host local authority to underwrite all costs associated with the Stockport Corporation;
- A commitment from Stockport Council to ensure existing staff resources are available to form the core executive team;
- A commitment to collaborative working between the Mayor, Stockport Council and the Stockport Corporation to agree how development is to proceed;
- Demonstration that the approach has the ability to simplify decision making;
- All partners to recognise that there should be no significant new revenue cost;
- Any ‘Board’ has the development expertise, prominence, and leadership capable of securing private investment and that that expertise is balanced in a way which builds in democratic accountability.

4. OBJECTIVES OF THE CORPORATION

4.1 The objectives of the Corporation are to lead the regeneration of the town centre west area of Stockport by:
• Delivering approximately 3,500 new homes set within a mixed use green urban village in accordance with the Strategic Business Plan;

• Contributing to the delivery of the social infrastructure and amenity required to support an increase in the residential population of the area and to benefit existing residents of the area;

• Attracting public and private sector investment to support the delivery of residential and employment growth; and

• Delivering a blueprint for brownfield development in a town centre context that fits with the GMCA’s and the Council’s overall strategic growth ambitions.

• The Stockport Corporation will work closely with the Council, the GMCA and Homes England to achieve its objectives.

5. STRATEGIC BUSINESS PLAN

5.1 The Stockport Corporation is to exercise all its powers and duties in accordance with the law, its constitution and the Strategic Business Plan. As set out in its Constitution the Board’s Strategic Business Plan must be approved by the GMCA and Stockport Council on an annual basis prior to this being adopted formally by the Stockport Corporation.

5.2 By the end of March 2020, it is proposed that Stockport Corporation will deliver against the following objectives:

• A final form of the Stockport Town Centre West Strategic Regeneration Framework (SRF) approved by Stockport Council and the Board and progressing through the formal adoption process as a Supplementary Planning Document within Stockport Council’s planning framework;

• A joint Investment Strategy agreed with Stockport Council, Homes England and GMCA;

• An early land acquisition strategy to be developed and delivered with key stakeholders and agree how this will come forward to support the objectives of the MDC;

• Production of a dynamic delivery pipeline demonstrating how the housing targets set out in the SRF will be achieved over the short, medium and long term;

• Engagement formally as the MDC with other infrastructure partners together to develop an infrastructure roadmap to set out the requirements to enable delivery within the MDC area;

• Engagement with Network Rail, TfGM, rail franchisees and other key stakeholders to produce an agreed plan for the future development of Stockport Rail Station as a critical element of infrastructure in the successful delivery of the MDC vision. It is envisaged that this will be led by one of the Strategic Advisors who are advising the Board;
• A detailed examination of solutions which will deliver against the core objectives of Design, Sustainability and Innovation set out in the SRF. This will involve the investigation of best practice in use elsewhere and again we would propose working with one of the Strategic Advisors to deliver this and
• The Annual Strategic Business Plan for the financial year 2020-21 agreed by the Board, Stockport Council and GMCA in line with the Constitution of the MDC.

6. RECOMMENDATIONS

6.1 Recommendations are found at the beginning of the report.
By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.
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