

**GREATER MANCHESTER PLANNING, HOUSING & ENVIRONMENT OVERVIEW AND SCRUTINY COMMITTEE**

Date: 29 July 2020

Subject: GMSF timetable

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**PURPOSE OF REPORT**

To update members on the progress of the Greater Manchester Spatial Framework

**RECOMMENDATIONS:**

The Scrutiny Committee is recommended to:

1. Review the report
2. Suggest any recommendations to AGMA Executive Board prior to consideration

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## **1. THE STRATEGIC CONTEXT FOR THE GM SPATIAL FRAMEWORK**

- 1.1 The Greater Manchester Combined Authority and the 10 Local Authorities have developed a comprehensive set of policies and strategy documents that pave the way for inclusive and sustainable growth across the conurbation. These policies and strategies are targeted at growing the economy, reducing inequalities, and reducing carbon emissions. The plans themselves are long term in nature and therefore provide a blueprint against which GM can deliver over a longer time horizon.
- 1.2 The “Future of GM” paper launched in January 2019 set out GM’s bold plans for the future in the face of uncertainty. At the time that uncertainty was caused by a range of factors including BREXIT. Despite Covid 19 and the ongoing uncertainty about the UK’s future trading relationships, the bold and ambitious vision for the city-region remains unchanged, although the actions prioritised to achieve some of those ambitions will inevitably have to change. Greater Manchester’s ambition to continue to be - and further develop our position as - a global city-region, with strong and prosperous communities throughout as well as a thriving and productive economy remains. Without a clear, long term cohesive set of plans it becomes almost impossible to implement and deliver initiatives that will achieve this ambition.

## **2. IMPACT OF COVID-19**

- 2.1 Covid 19 has had a major impact on the way people live and work over the shorter term with a high degree of uncertainty over its impact in the long term. In response the Government has been very clear that we need to positively plan for recovery. The Prime Minister made his Build, Build, Build announcement at the end of June 2020 setting a context for England as we recover from COVID-19 which emphasised:
- i. Planning reforms (relaxation of controls over changes of use to residential, demolition and rebuilding, fast track approvals for property owners wanting to extend);
  - ii. The importance of high street revival;
  - iii. The establishment of a ‘new’ cross-government strategy for the management and release of public sector land to support house building, growth, net zero carbon goals, environmental improvements;
  - iv. Support for home building across England through £12 billion affordable homes programme (over next 8 years), First Homes pilot, £400m Brownfield Land Fund, £900m Getting Building Fund.
- 2.2 Later this year the government will publish their English Devolution & Local Recovery White paper articulating how government will partner with places to build sustainable economic recovery. A National Infrastructure Plan and major reforms to the planning system are also expected later this year.
- 2.3 The Chancellor’s Statement at the beginning of July sought to kick-start the UK’s economic recovery. A three point Plan for Jobs was unveiled to support, protect and create jobs, with total fiscal support amounting to £30 billion. Key announcements include a new £2bn scheme to create thousands of job placements for young people, a new job retention bonus for employers who bring back furloughed staff, a temporary change to stamp duty and a temporary cut to VAT on food, accommodation and attractions to help the hospitality and tourism sector. In addition the Chancellor outlined investment in infrastructure with a focus

on investing in green jobs totalling a new £3bn investment. This will include a new 'Green homes grant' worth £2bn and funding of £1bn to improve the efficiency of public sector buildings, alongside a £50m fund 'to pilot the right approach to decarbonise social housing. An Autumn Budget and Spending Review were confirmed.

- 2.4 The recently announced Brownfield Land Fund is targeted at Combined Authorities and begins to help Greater Manchester address viability issues across the conurbation. The accompanying guidance makes it clear that councils must either have an up to date Local Plan or Spatial Framework in place, or an agreed plan with MHCLG for getting a Local Plan or Spatial Framework in place, to receive funding. Progressing the GMSF and agreeing the revised timetable is essential to access the Brownfield Land Fund
- 2.5 The impact, therefore, needs to be reflected in the way that GM brings its strategies forward, rather than in the strategies themselves. Whilst the arrival of Covid 19 was not anticipated and its impact is very significant, our approach needs to be flexible to address unpredictable challenges that will arise over the course of any long-term strategy.
- 2.6 The initial learning from the first wave of Covid 19 (recognising that the pandemic is an ongoing health and economic crisis) will be reflected in the 1 Year 'Living with Covid Plan' that will be published in early September 2020. The crisis has created job uncertainty while highlighting the need for flexible lifestyles. Adapting to these challenges will require a more joined-up, versatile city region while delivering environmental outcomes and integrated health and social care. As Greater Manchester moves from the emergency and lockdown phases a clear sense of direction is needed, including a comprehensive plan to enable the successful restart and recovery of our economy and society, whilst recognising that the pandemic is an ongoing health and economic crisis in the immediate term.
- 2.7 GM must build on opportunities, capitalise on positive changes made as part of the emergency response, and ensure Greater Manchester is focused on the right things, which can be delivered in timely and agile ways in response to the changeable requirements presented by Covid 19. The increase in walking and cycling has demonstrated that if conditions are right, sustainable modes of travel become the first choice for people travelling relatively short journeys; temporary re-allocation of road space has allowed for a re-imagining of how towns and cities can operate. GM needs to accelerate those things that it is confident address the issues arising from Covid 19, for example the need for affordable housing (as evidenced by the numbers of people on council waiting lists, particularly those in priority need), whilst accepting that it will take time for an evidence base to form that can create a sound basis for materially altering our long term actions. New population and household projections ordinarily would be expected in 2022 however ONS is suggesting 2023 to allow for Census outputs, and there is little value in commissioning new economic forecasts when the situation is so uncertain.
- 2.8 The industrial assets outlined in the Local Industrial Strategy are all still vitally important in GM's economic future and contributing to driving UK growth. GM will still be required to address the climate emergency and the 2038 targets using a cocktail of responses that enables development but will force longer term sectoral change - so requiring challenging carbon emission targets on property development over a reasonable time frame (net zero by 2028) will enable the market to adapt without being a barrier to development in the short term, as will the implementation of building retrofit measures.

2.9 The crisis has reinforced some of our agendas and accelerated the need for action. For example, the switch to electric vehicles to reduce carbon emissions and improve air quality was inevitable, but the need for large scale adoption has never been greater given the likely short term increase in car usage due to safety concerns about using public transport. GM was also always going to need to deliver more truly affordable homes, but this need is likely to increase and delivery needs to be accelerated as the economic impact of Covid 19 is felt across the conurbation.

### **3. THE GREATER MANCHESTER RESPONSE**

3.1 The approach to the delivery and implementation of our long term strategies and plans will need to recognise the potential for change that Covid 19 has and continues to create, and to maintain a level of flexibility to adapt while still providing a robust foundation on which to build and grow GM. Flexibility does not mean that GM pauses the adoption of bold long term strategies where there is no concrete evidence supporting a change in approach. It means we work in a different way to achieve our ambitions.

3.2 While Covid 19 will impact on the way GM delivers its ambitions it may also make delivery of that ambition more challenging. There will be some difficult choices and tensions that need to be managed in an integrated and balanced way. That is why GM is setting out our bold “Living with Covid one year Recovery Plan”, that will set out near term actions that will start to address the stresses on the GM system that have been laid bare by Covid 19.

3.3 The GMSF provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes and protect and enhance the natural environment. Progressing our long-term Spatial Framework is therefore more important than ever to make sure GM is on the right track to support our recovery, build back better and access the necessary investment for realising our ambitions. The GMSF is not being prepared in isolation. The Transport 2040 Delivery Plan will outline the transport interventions required to achieve the transport vision for the city region. At the same time, the consultation on the Clean Air Plan will seek views on how Greater Manchester plans to tackle air pollution which contributes to around 1,200 early deaths in Greater Manchester every year, harming our health and our economy. Each of these plans is part of a coherent set of measures that will seek to meet our overall objectives.

### **4. THE IMPLICATIONS FOR THE GM SPATIAL FRAMEWORK**

4.1 The need for a bold spatial plan to provide certainty and guide development, investment and infrastructure has never been stronger. Government has sent a very strong message that Covid-19 should not be a reason to delay either the preparation of statutory plans or the determination of planning applications through the publication of emergency guidance to enable local authorities to continue to exercise their planning functions in a Covid-19 compliant way. The Greater Manchester Spatial Framework – a Plan for Homes, Jobs and the Environment - is an essential building block of the city-region’s long term recovery. It will: provide a platform for development that enables us to attract central government funding to deliver affordable housing and infrastructure; enable utilities to deliver their infrastructure investment; give confidence to the private sector to grow and invest in GM; provide a route by

which construction can proceed, providing short term economic stimulus; and provide a mechanism for accelerating the low carbon / sustainability agenda. In short, the GMSF will demonstrate what ‘building back better’ means spatially for Greater Manchester.

- 4.2 Mechanisms for mitigating the possible long term impacts of the pandemic will be incorporated into GMSF and it will include a review of development trajectories particularly in the early years, a review of the approach to allocating land and a commitment to a radical early review if convincing evidence emerges post adoption.

## **5. GM SPATIAL FRAMEWORK: - PROCESS TO DATE**

- 5.1 Consultation on the Revised Draft GMSF took place between January and March 2019. Over 17,000 responses were received. Since the consultation closed, work has been underway to analyse the responses (a consultation summary report was published in October 2019), commission new evidence and prepare a further version of the plan.
- 5.2 The original timeline for the next consultation on GMSF was to seek approval from the GMCA and the 10 districts immediately following the Mayoral and local elections planned for May 2020 and to begin a 12 week consultation in August 2020. In the light of Covid19 emergency, these timescales were not achievable for 2 reasons:
- Availability of resource to complete the work (staff absence/redeployment of district capacity/furloughing of consultant support)
  - Government guidance on social distancing and restriction on public gatherings
- 5.3 Consideration has been given to the production of a new timeline, which is the subject of this report. This is based upon the GMSF continuing as a joint Development Plan Document (DPD) of the 10 Greater Manchester Local Authorities, as the necessary amendments to the Spatial Development Strategy (SDS) Regulations have not yet been made by the Government.

## **6. REVISED GMSF TIMELINE**

- 6.1 There have been two previous consultations on GMSF (2016 and 2019). The next consultation will be the ‘Publication stage’, a formal consultation on the draft joint DPD which it is intended to submit to the Secretary of State for examination, pursuant to Reg. 19 of the Local Planning Regulations. The decision to publish the draft joint DPD is an Executive decision for the GM local authorities.
- 6.2 At the end of the consultation period, the draft joint DPD and all representations received are then sent to the Secretary of State (the “Submission stage”) pursuant to Reg. 22 of the Local Planning Regulations. Submission is likely to happen in summer 2021 and requires approval of each of the 10 Full Councils of the GM local authorities. Whilst anyone can make a representation on any point, only those pertaining to the 4 tests of soundness will be taken into account by the Inspector(s).
- 6.3 The national planning policy framework suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities,

so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

- 6.4 This version of the GMSF will be the third draft plan produced. It will be the plan that AGMA will recommend to the Greater Manchester local authorities to submit to the Secretary of State. As such, GMSF 2020 will be taken to each local authorities Cabinet/Executive for approval for Publication stage and each Full Council for approval in October/November 2020 for the Submission stage. Although representations are invited at Publication stage, these are then submitted to the Secretary of State along with the draft DPD and considered at the Examination in Public. If major new issues arise there would need to be further consultation.
- 6.5 The Publication plan needs to be supported by a robust evidence base and meet legal requirements. Work has continued on the preparation of the evidence base and it is anticipated that this will be largely complete by the end of July 2020.
- 6.6 The revised timeline (Appendix 1) proposes an 8 week consultation on the Publication draft starting in November 2020. The timeline assumes in broad terms that, following the collation of the evidence to inform the plan and the completion of the required Integrated Appraisal work, Districts will be asked to formally approve the plan in September/October 2020. Upon completion of the consultation on the Publication draft in late 2020/early 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in June 2021. It is anticipated that the plan will be ready for adoption at some point in 2022 (depending on the timetabling of the Examination in Public by the Planning Inspectorate).
- 6.7 In producing the revised timeline three key issues have been taken into account:
- Impact of the current Covid 19 on Greater Manchester’s future strategy (Section 2)
  - Risks to the proposed timetable (Section 7)
  - Ability to consult meaningfully in a Covid compliant world (section 8)

## **7. RISKS TO THE TIMETABLE**

- 7.1 There is a strong commitment from all districts and the GMCA to progress the GMSF as quickly as possible given its importance in supporting Greater Manchester’s recovery from Covid 19.
- 7.2 It is proposed that work continues to complete the evidence base and draft GMSF 2020 for publication in November 2020 given the importance of bringing the plan forward to provide a basis for sustainable development, helping to tackle the housing crisis, support investment and coordination of development. However, there are risks which could impact on this that could delay the GMSF.

- 7.3 The most obvious is a second spike in Covid 19 either nationally or locally. This could affect:
- the ability to complete all of the work needed if staff and consultant support is affected (either by staff absence or redeployment / furlough);
  - the timescales needed to respond to the evidence and the ability to consult meaningfully/fairly if the region/country is in lockdown.
- 7.4 Mitigation measures including local outbreak management plans will be in place and these will be taken into account as GM develops the plan and our consultation strategies.
- 7.5 Alongside this there is a further risk that evidence being concluded now presents challenges to the plan requiring the need for further dialogue within Greater Manchester, with neighbouring boroughs or statutory consultees which cannot be completed within the timeframe for a November publication.
- 7.6 Evidence collated to date for the GMSF will continue to be reviewed in the light of available economic information as far as is possible. In terms of housing growth, Government has restated its commitment to delivering 300,000 homes pa by the mid 2020's in its 2019 manifesto.
- 7.7 A Planning White Paper/Planning Bill looking at reform of the planning system is anticipated in the summer. Additionally, Government is reviewing the Local Housing Need methodology, with a consultation anticipated in the summer. The Secretary of State indicated in his planning statement in March 2020 that whilst the Government is seeking to deliver 300,000 homes pa, there may be some weighting to redistribute growth to urban areas. It is unlikely therefore that the LHN for Greater Manchester will reduce from the current figure of around 10,500 homes pa.
- 7.8 As this is a situation which can change very quickly, reports will be brought to future meetings to update members on the current situation.

## **8. CONSULTING IN A COVID COMPLIANT WORLD**

- 8.1 The government has been clear that the challenge posed by Covid 19 is not a sufficient reason to delay local plan preparation. Equally however, all members of society are required to adhere to guidance to help combat the spread of coronavirus (Covid 19). The guidance has implications for how the public are engaged and the ability of the districts to comply with policies including those set out in their Statements of Community Involvement.
- 8.2 Work is underway in the districts to identify activities in Statements of Community Involvement which are inconsistent with current Covid 19 guidance. This could include, for example, the holding of face-to-face community events or the provision of physical documents for inspection in public buildings.
- 8.3 However, effective community engagement must be promoted by means which are reasonably practicable. Government guidance strongly encourages the use of online engagement methods which could include;
- virtual exhibitions,
  - digital consultations,
  - video conferencing,
  - social media and online chat functions

8.4 Reasonable steps need to be taken to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this. This could include;

- engaging sections of the community, that do not have internet access, through representative groups rather than directly;
- targeting those most affected by proposals;
- using existing networks;
- allowing individuals to nominate an advocate to share views on their behalf;
- Providing telephone information lines; and
- Providing timed face-to-face information sessions for community representatives (maintaining social distancing).

8.5 Different scenarios will be developed dependent on the level of social distancing in place at the time the publication is undertaken.

## **9. RECOMMENDATIONS**

9.1 Recommendations are found at the front of the report



**GREATER MANCHESTER SPATIAL FRAMEWORK – PROPOSED TIMETABLE**

