

Appendix 1 – Revisions to text of the GMSF2020 following the withdrawal of Stockport

a) Differences between 'Places for Everyone' 2021 and the GMSF 2020

The text of the GMSF 2020 has been revised following the withdrawal of Stockport. The revisions to the PfE 2021 (compared to GMSF 2020) fall into 5 broad categories:

As a direct result of the withdrawal of Stockport Council from GMSF

Policies relating specifically to Stockport Council's area have been removed (e.g. strategic allocations). Housing and employment land requirements and supply have been recalculated to reflect the withdrawal of Stockport Council, the change in the Plan period and the outcome of Duty to Co-operate discussions with Stockport, as has the extent of the proposed release of Green Belt in the remaining nine districts. The plan period has been updated from 2020-2037 to 2021-2037; and references to 'Stockport' 'Greater Manchester', 'Greater Manchester Spatial Framework' and 'GMSF' have been deleted and/or replaced where appropriate.

Information presented in the Plan relates to the 9 participating boroughs where appropriate and possible to do so. In some instances (such as air quality), information cannot be disaggregated from the Greater Manchester level, or it is not appropriate to do so as it is referring to the wider Greater Manchester area, including Stockport. In these instances it is legitimate to present the information for Greater Manchester.

As a direct result of changes to government policy since October 2020

Government published the revised methodology for calculating Local Housing Need (LHN) on 16 December 2020. The methodology for all of the Greater Manchester Authorities other than Manchester City Council was largely unchanged, however the new methodology resulted in a 35% uplift for the Manchester City Council area. The revised LHN methodology states that the 35% uplift is to be met within the district and not redistributed. As PfE 2021 has not been through the Publication Stage it is not subject to transitional arrangements and is required to take into account the standard methodology for calculating Local Housing Need published by Government on 16 December 2020. This resulted in the Manchester LHN increasing by 914 homes per annum or almost 15,000 homes over the plan period which has been reflected in Manchester City Council's housing land target in PfE 2021.

As a direct result of new evidence/information being made available since October 2020

The evidence base underpinning PfE 2021 builds on that compiled for GMSF 2020. Addenda have been produced where appropriate to outline the additional work which has been undertaken to take account of the changes between GMSF 2020 and PfE 2021 and the passage of time.

Clarification of policy wording

This category includes minor changes to a limited number of policies as a result of ongoing collaboration with statutory consultees, and to provide more clarity regarding implementation.

Minor typographical changes

This category relates to the correction of spelling and grammatical errors only.

b) Assessment of Proposed Changes

The revisions set out above have been reviewed in order to consider their impact on the effect of the PfE 2021 on the remaining nine authorities, compared to the GMSF 2020. The assessment of the effect of the changes is set out below.

As a direct result of the withdrawal of Stockport Council from GMSF

The effect on the remaining nine districts of the removal of the Stockport allocations and associated references is minimal.

The withdrawal of the Stockport allocations did not result in the need for the remaining nine districts to amend the distribution of their objectively assessed housing and employment needs. Therefore, the spatial strategy for the remaining nine districts will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The withdrawal of Stockport in December delayed publication of the plan under Regulation 19. The PfE 2021 plan period has therefore been revised to 2021 to 2037, from 2020 to 2037 (that of GMSF 2020). As a result, the overall (and individual) housing and employment land targets have been amended and the ability of the land supply to meet these revised targets has consequently altered. As a result, whilst a small number of changes have been made to allocations in Oldham and Salford, the resultant spatial strategy will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The proposed Green Belt release in PfE 2021 equates to 1,760 hectares, equating to 3.3% of the current Green Belt covering the 9 districts. GMSF 2020 proposed Green Belt release of 1,939* hectares, which equated to 3.1% reduction in the extent of the Greater Manchester (all 10 districts) Green Belt.

In light of this, it is considered that the revisions which fall into this category (as a direct result of the withdrawal of Stockport) would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020.

As a direct result of changes to government policy since October 2020

A higher annualised plan figure for Manchester City than in the GMSF 2020 (2,951 vs 3527) has been introduced within PfE 2021 as a result of the revised LHN. Through this process Manchester City Council has identified sufficient land in the urban area to meet its increased need and consequently remove a very small Green Belt housing site. This remains consistent with the GMSF 2020 spatial strategy which concentrated growth in the centre of the conurbation. Manchester City's increased LHN, and therefore its PfE 2021 housing target, helps to maintain a consistent spatial strategy, between the two plans, despite Stockport's withdrawal. and results in a Plan with substantially the same effect as the GMSF 2020 on the nine districts.

As a direct result of new evidence/information being made available since October 2020

The types of changes that fall into this category have arisen out of the need to maintain an up-to-date evidence base, despite the passage of time since the GMSF 2020 and similarly the need to have continuous dialogue with key stakeholders on matters of strategic importance. The effect of the proposed amendments on the overall strategy and objectives of the plan have substantially the same effects on the participating nine districts as GMSF 2020.

Clarification of policy wording

Minor changes have been made to assist in the interpretation of the policies. It is not considered that these changes impact on the overall objectives of the policies or specific allocations. Therefore, the effect of the policies on the remaining nine districts remains substantially the same as they did in GMSF 2020. However, they make the plan less ambiguous, in line with NPPF.

Minor typographical changes.

This category relates to the correction of spelling and grammatical errors only and therefore result in a plan which has a substantially the same effect on the participating districts as GMSF 2020.

Cumulative impact of changes

Having considered the impact of the changes above, it is necessary to consider if their cumulative impact would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, as with the above assessment, 'substantially the same effect' does not mean 'the same effect'. It allows for flexibility to address the fact

that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations.

The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change. However, in determining the cumulative impact of these multiple changes, it is important to consider what impact they have had on the overall Vision, Objectives and Spatial Strategy of PfE 2021 compared to GMSF 2020, particularly for the decision maker in implementation terms.

Conclusions

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

On this basis, it is concluded that the PfE 2021 has substantially the same effect on the nine boroughs as was the case under the GMSF 2020 and it is therefore recommended that the plan proceed to a Publication stage (Regulation 19) consultation.

Leading Counsel has provided a note (Appendix 2) confirming the relevant statutory provisions and endorsing the approach and conclusions of officers that the plan has substantially the same effect.