

RTPI response to the Greater Manchester Spatial Framework

March 2019

1. We welcome the opportunity to respond to the revised Greater Manchester Spatial Framework (GMSF) consultation. As part of producing this response we have consulted with a wide range of our members in Greater Manchester and the North West of England.

1. General comments on the Spatial Framework

2. We welcome the revised GMSF as the first city-region to produce a Development Plan Document (DPD) in the North of England. The RTPI supports the pooling of planning powers and is following developments closely in preparation for possible future guidance for other combined authorities.
3. The RTPI strongly encourages the principles of strategic spatial planning and the benefits it brings to economic growth, the environment, social wellbeing and transport as outlined in our 2014 paper [Thinking Spatially](#)¹.
4. We will detail our suggestions for how the GMSF could be improved in the rest of this response. In summary our main recommendations focus on:
 - the length and detail which make it difficult to consider as one holistic document
 - a lack of resources highlighted by an evidence base that could be more robust in areas such as meeting the city-region's housing need outlined in the Greater Manchester Housing Land Supply Statement² risks delaying and undermining the process
 - A delay in the GMSF would be unfortunate for the wider devolution agenda and illustrates the need for combined authorities and Local Planning Authorities (LPA's) to have sufficient capacity supported by adequate resourcing.

2. Strategic objectives

2.1 Status of plan

5. A general point throughout this response is that the Mayor and GMCA should make ownership and responsibility of the document clearer by providing further explanation regarding the role of local councils and other stakeholders in delivering the city-region's ambitions. Parts of the GMSF risk overlapping into areas that local plans should focus on. The GMSF would benefit from clarifying the relationship with local plans. It is important to

¹ RTPI (2014) Planning Horizons no.1 |Thinking Spatially, Why places need to be at the heart of policy-making in the twenty-first century. Available from: https://www.rtpi.org.uk/media/1004403/rtpi_thinking_spatially.pdf

² GMCA (2019) Housing Topic Paper. Available from: <https://www.greatermanchester-ca.gov.uk/media/1737/housing-topic-paper-w-appendices-web.pdf> (page 10)

address delivery, resourcing and funding concerns at an early stage as opposed to reviewing at examination.

6. Examples of other best practice collaborations in delivering cross-boundary partnership working are highlighted in the RTPI policy paper [Strategic Planning](#)³.
7. The length and degree of detail of the GMSF make it difficult to consider as one holistic document and potentially duplicate processes that should be addressed in local plans. The inclusion of site allocations has the benefit of possibly saving end-to-end delivery times and also complies with the RTPI's view that green belt changes should happen at city-region scale. However for these advantages to be realised it does need to be clear how local plans will then operate, in view of the pre-existing allocations.

2.2 Raising ambition

8. Whilst we welcome the aspiration shown in the GMSF, we consider it could go further. It has the potential to be more ambitious in the context of being one of a select few city-regions with spatial planning powers outside of London and a pioneer in the English devolution agenda.
9. The document could be bolder in promoting the city-region's role as a driver of the [Northern Powerhouse agenda](#)⁴. The RTPI work on the '[Great North Plan](#)'⁵ is exploring how city-regions and key stakeholders across the North of England can better work together.
10. We are recommending the establishment of an expert independent group to assess the infrastructure, economic and social challenges for the Greater Manchester city-region. This independent group would recommend strategic objectives for the city-region in an approach based on the [National Infrastructure Commission's Cities work](#)⁶. Such an approach could increase public engagement and test opinions early in the process. We believe such a group could help to build on the momentum to harness the potential of the city-region.

3. Resources

3.1 Devolution of power without resources

11. Producing the revised GMSF and achieving consensus amongst the ten local authorities is a significant achievement. We particularly welcome the focus on place, a desire to promote a modal shift away from private vehicle use and towards public and active transport (with closer alignment to [The Greater Manchester Transport Strategy 2040](#)⁷ and ambitions towards a zero-carbon economy.

³ RTPI (2015), Strategic Planning: Effective Cooperation for Planning Across Boundaries. Available from <https://www.rtpi.org.uk/media/1230885/RTPI-Strategic%20Planning-Brochure%20FINAL%20web%20PDF.pdf>

⁴ Northern Powerhouse website, Available from: <https://northernpowerhouse.gov.uk/>

⁵ RTPI (2019). Ambitions for the North: People and Place. Available from: <https://www.rtpi.org.uk/greatnorthplan>

⁶ National Infrastructure Commission (2018), Next Steps for Cities, A new joint work programme on ambitious, effective plans for urban infrastructure. Available from: <https://www.nic.org.uk/wp-content/uploads/December-2018-Next-Steps-for-Cities.pdf>

⁷ GMCA (2017) Greater Manchester Transport Strategy 2040. Available from: <https://www.tfgm.com/2040>

12. However, a major concern is that a lack of resources risks undermining the progress of the Framework; this is perhaps best highlighted by its limited evidence base.
13. Delivering this wide-ranging Framework requires significant investment in the GMCA and LPAs to deliver the plan-led policies. Concerns are expressed regarding the evidence base produced, for example on housing numbers, supply of raw materials and participation in sport. We detail specific concerns in the next section on housing. The overriding concern is whether the evidence underpinning the GMSF is sufficiently robust and therefore sound.

4. Housing

4.1 General comments on Housing

14. The following comments relate to the policies within Chapter 7: Homes for Greater Manchester. Members expressed concerns regarding the limited evidence base for the proposed level of development, the types of housing proposed and uncertainty over the viability of the brownfield first policy. In summary these factors have contributed towards uncertainty expressed by our members about the viability of the GMSF on housing delivery.

4.2 Density and Viability

Policy GM-H 1: Scale of New Housing Development

15. A minimum of 201,000 net additional dwellings will be delivered in Greater Manchester over the period 2018-37. We note that the GMSF adopts the minimum 'standard method' figure, also described as the "*starting point*" for assessing objective housing needs, as its housing requirement. Policy GM-H2 notes that significantly increasing the housing supply is among the ways to support the provision of affordable housing. Concerns have been expressed that Policy GM-H 1 contradicts Policy GM-H 2 through not proposing a higher housing figure and will prevent the GMSF achieving its economic objectives. We note that the issue of development within the green belt is the subject of [ongoing discussions](#)⁸ between the Ministry of Housing, Communities and Local Government and the GMCA.
16. Our response to the Government consultation on [Planning for the right homes in the right places](#) outlined concerns with the approach to assessing housing need. We argued that the approach to assessing local need does nothing to address the system's tendency to base housing growth on past trends rather than a more forward-looking strategy to also take into consideration future growth aspirations and employment projections.

Policy GM-H 3: Type, Size and Design of New Housing

17. The requirement to adhere to M4(2) Category 2: Accessible and adaptable dwellings in [the Building Regulations 2010, Access to and use of Buildings approved document](#) is welcomed.
18. However, the policy could be improved further by adding a reference to a requirement to adhere to Category ADM4(3), wheelchair accessible housing subject to specific site conditions making this impracticable. It would be the role of local plans to assess the level of requirement for these standards in their local area where other relevant factors could be considered including the impact on project viability.

⁸ House of Commons (21 February 2019), Westminster Hall debate, Greater Manchester Spatial Framework. Available from: <https://hansard.parliament.uk/Commons/2019-02-21/debates/66792E51-0F2A-4889-A8C2-7DBD17A13241/GreaterManchesterSpatialFramework>

Policy GM-H 4: Density of New Housing

19. The Framework's 'brownfield-first' approach to the release of sites for development is based on a clear decision to prioritise increased density around transport hubs and town centres, whilst minimising development in the green belt. Members suggested that a more appropriate approach would be to allocate sites in the greenbelt in a more holistic way. The RTPI Policy Statement [Where should we build new homes?](#)⁹ provides further details on identifying new housing development opportunities.
20. Concerns were expressed that the housing evidence base could be more robust. For example the Greater Manchester Housing Land Supply Statement¹⁰ contains optimistic assumptions that the Strategic Housing Land Availability Assessment sites will deliver the majority of residential development.
21. The transport accessibility of sites is equally important to where they are located. In order to better monitor progress, we would welcome the use of Public Transport Accessibility Level or Active Transport Accessibility Levels (ATAL) in the Greater Manchester Transport Strategy 2040 (GMTS)¹¹.
22. [RTPI research](#)¹² has demonstrated how a 'brownfield first' policy will fail to deliver all of its full potential if there is insufficient available funding for the treatment and assembly of land. The RTPI has made a number of recommendations about how to deliver housing on a large scale¹³.

Design guidance

23. Developing inclusive design guidance for the region based on Manchester City Council's approved inclusive design policy [Design for Access 2](#)¹⁴ would be welcomed. We understand that the document could benefit from an update with new sections added (e.g. designing for 'conditions of the mind'...autism, dementia and agoraphobia).

4.3 Existing housing stock

24. We would like to see increased linkages made between planning, poor quality older housing and health. A Northern Housing Consortium report on [the hidden costs of poor quality](#)

⁹ RTPI (2016) Where should we build new homes? RTPI Policy Statement on identifying new housing development opportunities. Available from:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjmgZ_ozovhAhXZTxUIHXrtAxUQFjAAegQICRAC&url=http%3A%2F%2Frtpi.org.uk%2Fmedia%2F2540343%2Fwhereshouldwebuild.pdf&usg=AOvVaw2sCzrSrK4M4Q-9hRVY1Rrig

¹⁰ GMCA (2019) Housing Topic Paper. Available from: <https://www.greatermanchester-ca.gov.uk/media/1737/housing-topic-paper-w-appendices-web.pdf> (page 10)

¹¹ GMCA (2017) Greater Manchester Transport Strategy 2040. Available from: <https://www.tfgm.com/2040>

¹² RTPI (2016) Where should we build new homes? RTPI Policy Statement on identifying new housing development opportunities. Available from:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjmgZ_ozovhAhXZTxUIHXrtAxUQFjAAegQICRAC&url=http%3A%2F%2Frtpi.org.uk%2Fmedia%2F2540343%2Fwhereshouldwebuild.pdf&usg=AOvVaw2sCzrSrK4M4Q-9hRVY1Rrig

¹³ RTPI (2013), Delivering Large Scale Housing. Available from:

<https://www.rtpi.org.uk/media/630969/RTPI%20large%20scale%20housing%20report.pdf>

¹⁴ Manchester City Council (2003). Design for Access 2. Available from:

https://secure.manchester.gov.uk/downloads/download/5366/design_for_access_2

[housing in the north](#)¹⁵ outlined how “Sub-standard private housing is a major problem in the North, yet the issue is overlooked and rarely discussed...and is a particularly urgent concern for many older homeowners.”¹⁶

25. The GMSF notes that the vast majority of existing homes in Greater Manchester will still be in existence in 2050¹⁷. The Framework could benefit from acknowledging the impact of poor condition housing on health and wellbeing.
26. Under the strategic objectives, we suggest that the following be added to **Objective 1: “Seek funding to improve poor quality older private housing”**. These concerns relate to older private housing in poor condition that can date back to pre-1919.
27. Under Section 9.4 we suggest that adding the following would give more weight to this important issue: “significantly increasing the supply of new housing **and improving non-decent, older, private housing**”.
28. We therefore recommend a strategy for dealing with the large supply of existing housing stock in poor condition that are often located in deprived communities. Much of this stock dates from the 19th century and served the many industries across the city region at that time. Such a strategy could have multiple environmental and social benefits through improving energy efficiency, enhanced living conditions and reduced risks to health.

Policy GM-H 2: Affordability of New Housing

29. Under this policy after the lines “significantly increasing the supply of new housing” we suggest adding the point “**increasing the amount of decent, older, private housing**”.

4.4 Accessibility

Policy GM-E 1: Sustainable Places

30. We agree with the approach to this policy, however would suggest the following minor changes to further promote social inclusion objectives:
 - “Greater Manchester will aim to become one of the most liveable city-regions in the world, consisting of a series of beautiful, healthy, **inclusive** and varied places”
 - Replace the word “sensually” with the words “**visually stimulating...environments.**”

¹⁵ Northern Housing Consortium (2018). The hidden costs of poor quality housing in the North. Available from: <https://www.northern-consortium.org.uk/wp-content/uploads/2018/10/The-Hidden-Costs-of-Poor-Quality-Housing-in-the-North.pdf>

¹⁶ Ibid.

¹⁷ DCLG figure quoted in http://www.lcmp.eng.cam.ac.uk/wp-content/uploads/081012_kelly.pdf

5. Infrastructure

5.1 General comments on Infrastructure

31. It is encouraging to see the body of work produced for the [Infrastructure Framework](#)¹⁸; we feel that the GMSF would benefit from more of a focus on delivering infrastructure for housing growth.
32. Developing around existing and planned transport infrastructure is sensible as a general rule. However, the combination of ambitious housing targets and restrictions on development in the green belt might lead to excessive stress on this infrastructure. Measures will need to be in place to secure adequate physical and social infrastructure in all locations promoted in policies for growth.

Policy GM-D1: Infrastructure Implementation

33. Following our concerns expressed earlier in this response regarding current housing stock in poor condition, we suggest that under this policy the following lines are added to read as follows: “Establish a new long-term funding mechanism for the improvement of older, non-decent, private housing”.

5.2 Joining up/minimising project delays

34. The theme of coordination and a joined-up approach is crucial to the success of the Framework. We welcome the work towards this with the [simultaneous publication](#)¹⁹ of supporting documentation.
35. [RTPI practice advice](#)²⁰ has highlighted some of the challenges involved in delivering large-scale housing. This often results in a fragmented approach to infrastructure, where councils struggle to coordinate the wide range of organisations involved in the delivery of public transport, schools and hospitals, water, waste, energy and digital networks. This creates uncertainty for developers, places strain on existing infrastructure, and generates opposition to development from local communities. The importance of coordination in delivering the GMSF will be crucial.
36. The GMSF could encourage a more coordinated approach through for example advocating that master planning takes place at the earliest opportunity and working with key partners such as utility companies and network providers to identify any potential delays from the outset.

¹⁸ GMCA (2019) Greater Manchester Infrastructure Framework 2040. Available from: <https://www.greatermanchester-ca.gov.uk/media/1715/greater-manchester-infrastructure-framework-2040.pdf>

¹⁹ GMCA (2019). Supporting documents. Available from: <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-documents/>

²⁰ RTPI (2019) Delivering Large Scale Housing: Learning from research in the South West of England. Available from: <https://www.rtpi.org.uk/media/3227010/deliveringlargescalehousingpracticeadvice2019.pdf>

5.3 Minerals

37. The Framework could further explain the critical role of minerals in delivering the development targets outlined. We understand that Greater Manchester relies significantly on imports of minerals. This is important to make clear and ensure plans are in place to ensure an adequate and steady supply of the necessary raw materials. Supply of these raw materials cannot be assumed. On this point the [Greater Manchester Joint Minerals Development Plan](#)²¹ published in April 2013 is the key document in the delivery of mineral products for the city-region. The NPPF notes how “Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy”²². Collaboration with neighbouring authorities including in North Wales and Cumbria on the supply of minerals would promote a reliable supply of raw materials.
38. We suggest that the production of an updated minerals plan in parallel with the GMSF would better align development targets with raw materials’ requirements. This would help to predict and provide for the anticipated supply and demand, thereby avoiding any incorrect assumptions regarding the availability of raw materials. Measures to transport the materials as sustainably as possible should also be factored in. Safeguarding and maintaining sufficient aggregate import depots is crucial for delivering the large amount of raw materials into the city-region.

6. Transport

6.1 General comments on transport

39. [The Greater Manchester Transport Strategy 2040 \(GMTS\)](#)²³ sets a visionary narrative and the following policies are encouraging in promoting a modal shift away from private vehicle use and towards public and active transport. However further clarification on delivery and funding would be welcomed. Integration between the GMSF and GMTS is critical to enabling sustainable growth while reducing the negative impacts of transport.

Policy GM-S 6: Clean Air

40. Establishing Clean Air Zones or other travel demand measures before planning for growth would embed consideration of measures to improve air quality from the start of the process.

Policy GM-C 1: World-class connectivity

41. This policy would benefit from noting the importance that the city-region delivers world class connectivity while at the same time meeting its carbon reduction targets. The Committee on Climate Change’s report “UK housing: Fit for the future?” notes that “Given new evidence that many recently constructed housing developments are encouraging car-dependent lifestyles, the planning process must change to increase the importance of sustainable travel, including walking, cycling, and the use of public transport and electric vehicles”²⁴. This is another area where close integration between the GMSF and GMTS is

²¹ Association of Greater Manchester Authorities (April 2013), Greater Manchester Joint Minerals Plan. Available from:

http://www.manchester.gov.uk/download/downloads/id/20926/2a_adopted_minerals_planpdf.pdf

²² MHCLG (2019), National Planning Policy Framework. Available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf (page 10)

²³ GMCA (2017) Greater Manchester Transport Strategy 2040. Available from:

<https://www.tfgm.com/2040>

²⁴ Committee on Climate Change (2015), [UK housing: Fit for the future?](#) Available from:

necessary.

Policy GM-C 3: Walking and Cycling Network and Policy

42. We are pleased to see plans to increase the capacity of the walking and cycling network in locations where significant growth in the number of short journeys is anticipated and where quality of place improvements are proposed. The progress of [Greater Manchester's cycling and walking infrastructure proposal](#)²⁵ will be an important barometer in assessing the progress towards achieving a genuine modal shift and increases in journeys made by walking and cycling. We understand that more detailed guidance will be prepared on monitoring and evaluation to include assessments of individual schemes and the entire programme of network improvements. It is important to note that significant investment will be required to support a successful modal shift in travel patterns.

Policy GM-C 4: Public Transport Network

43. Major proposed investments such as HS2 and Northern Powerhouse Rail will have a large and positive impact on the city-region. RTPI research on [Transport Infrastructure Investment](#)²⁶ outlined the wider benefits of investment in infrastructure. We welcome steps taken to prepare for the arrival of the large scale investments such as the [HS2 and Northern Powerhouse Rail strategy](#)²⁷.

Policy GM-C 5: Transport Requirements of New Developments

44. On the policy to make adequate parking provision for disabled people we suggest that a Greater Manchester Accessible Parking Standard should be developed.

Policy GM-C 6: Highway Infrastructure Improvements

45. We support targeted improvements to the highway network but within the overarching context of an objective to reduce private car use and secure a significant increase in the proportion of trips made by walking, cycling and public transport.

Policy GM-Strat 14: A Sustainable and Integrated Transport Network

46. We welcome the proposals for investment in the transport network as a positive step in promoting a modal shift away from private vehicle use and towards public and active transport.

47. The Framework would benefit from the following clarifications:

- Further comment on plans to expand the charging infrastructure in preparing for the continued growth of electric vehicles
- A description of how the GMCA are working with other key transport stakeholders such as Transport for the North, Network Rail and Highways England in promoting maximum benefits from the proposed transport investment in the city-region
- Whether there is sufficient funding in place to deliver the projects

<https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>
(Page 9)

²⁵ GMCA, Beelines (2018). Greater Manchester's cycling and walking infrastructure proposal. Available from:

<https://assets.ctfassets.net/nv7y93idf4jq/34oOjdbQmslme14AQQM8My/e8dee4819e6bc8c13036af620d81259f/Beelines.pdf>

²⁶ RTPI (2014), Transport Infrastructure Investment. Available from:

<http://rtpi.org.uk/knowledge/policy/policy-papers/transport-infrastructure-investment/>

²⁷ GMCA, HS2 and Northern Powerhouse Rail strategy, The stops are just the start.

Available from:

https://assets.contentful.com/nv7y93idf4jq/4sSHKQVxGMQuM488IMsWqG/cdc77581d9f6ce8d407b07976a2417e0/17-1060_HS2_Growth_Strategy.pdf

- Clarification around the evidence base assessing travel to work patterns.

7. Economy

48. There is potential for the Framework to be more outward looking and bolder in promoting the city-region's role as a driver of the [Northern Powerhouse](#)²⁸.
49. The economic contribution played by Manchester as a 'Sporting City' and spectator destination could be more clearly highlighted in the Framework. Sport England has produced [valuable insights](#)²⁹ into this area.
50. We support the work of the UCL Institute for Innovation and Public Purpose (IIPP) in their [mission orientated approach](#).
51. The excellent [Greater Manchester Independent Prosperity Review](#)³⁰ has set out a *Mission-Oriented approach to clean growth* and we would emphasise that this has planning implications. Why not make the mission of the GMSF that GM is a carbon neutral city region by 2038 as suggested there? The Review sets out 6 projects which surely have a planning implication including:
- 1 Carbon-neutral retrofit and new-build homes
 - 2 Climate resilient public realm
 - 4 21st Century energy supply
 - 5 Walkability, cycle-ability and demography-led clean transit links

This would all seem a suitable means by which the GMSF could increase public interest and buy-in as these are all topics which could potentially receive widespread public support.

8. Relationships with neighbouring authorities

52. We would welcome greater focus on ways in which the GMSF could better collaborate with neighbouring strategic authorities in the North of England.
53. The RTPI have been working with IPPR North and other stakeholders to produce a '[Great North Plan](#)'³¹ to underpin the Northern Powerhouse agenda. There is broad agreement among stakeholders in the North of England that a '[Great North Plan](#)'³² is needed. The latest phase of this project seeks to develop a set of shared ambitions to advance strategic planning and governance across the North, which would:
- Promote co-operation beyond traditional boundaries
 - Create a joined-up approach that helps northern towns, cities and rural areas develop sustainably
 - Ensure that prosperity generated by the Northern Powerhouse is shared as widely as possible, not just in the key cities.

²⁸ Northern Powerhouse website, Available from: <https://northernpowerhouse.gov.uk/>

²⁹ Sport England, Sport and the Economy. Available from: <https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/>

³⁰ Greater Manchester Independent Prosperity Review: A Mission-Oriented Approach to Clean Growth: Available from: https://www.greatermanchester-ca.gov.uk/media/1909/gmipr_tr_amiissionorientedapproachtocleangrowth.pdf

³¹ RTPI (2019). Ambitions for the North: People and Place. Available from: <https://www.rtpi.org.uk/greatnorthplan>

³² Ibid.

9. Sustainable development including the environment, natural capital and green infrastructure

9.1 General comments on Sustainable development

54. We welcome the policies in Chapter 8 'A Greener Greater Manchester' which takes a holistic approach by looking at all-natural spaces instead of only the green belt. The target to achieve carbon neutrality by 2038 is particularly positive. We are encouraged to see the most ambitious targets of any city-region in Europe, and 12 years earlier than the previous Greater Manchester goal of 2050³³. We note that the city-region's 5 Year Environment Plan will be published in due course.
55. The RTPI and Town and Country Planning Association have produced [Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change](#)³⁴ which outlines the steps that strategic plans can take to meet carbon reduction targets. This notes how the National Planning Policy Framework (NPPF) highlights how plans should demonstrate a commitment "to radical reductions in greenhouse gas emissions"³⁵.

Policy GM-G 6: Urban Green Space

56. We suggest that this policy could be strengthened by exploring how urban greening could be further embedded into the Framework. For example [the draft New London Plan](#)³⁶ includes a policy requiring that "Major development proposals contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage"³⁷.

Policy GM-S 2: Carbon and Energy

57. The ambition for all new development to be zero carbon by 2028 is an encouraging but challenging target. The report [Towards 'Zero Carbon' Housing Futures?](#)³⁸ examined British volume housebuilders' preparations for delivering 2016 zero carbon housing, prior to national targets being abandoned. One of the main findings was that delivery had been hampered by policy ambiguity.

³³ UCL Institute for Innovation and Public Purpose, Mission-oriented approaches in practice: Greater Manchester's 2038 Carbon Neutral Challenge. Available from: <https://medium.com/iipp-blog/mission-oriented-approaches-in-practice-greater-manchesters-2038-carbon-neutral-challenge-a28e3d00cbc>

³⁴ RTPI and Town and Country Planning Association. *Rising to the Climate Crisis A Guide for Local Authorities on Planning for Climate Change*. Available from: <https://www.rtpi.org.uk/media/3152143/Rising%20to%20the%20Climate%20Crisis.pdf>

³⁵ MHCLG (2019), National Planning Policy Framework. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf (page 44)

³⁶ Greater London Authority (2018). *Draft New London Plan*. Available from: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0>

³⁷ Ibid. (Page 308)

³⁸ University of Sheffield (2015) *Towards 'Zero Carbon' Housing Futures?* Available from: https://www.sheffield.ac.uk/polopoly_fs/1.531179!/file/ZCH.pdf

58. The GMSF needs to contain policies which meet the recommendations of the Committee on Climate Change (CCC) report [UK housing: Fit for the future?](#)³⁹ and contribute to the carbon budgets of the Climate Change Act⁴⁰. The CCC is an independent, statutory body established under the Climate Change Act 2008 to advise the UK Government and Devolved Administrations on emissions targets.
59. [A CCC report](#)⁴¹ contains several recommendations for delivering zero carbon housing which could support delivery in Greater Manchester. These include:
- “greater levels of inspection and stricter enforcement of building standards are required, alongside stiffer penalties for non-compliance...
 - The 'as-built' performance of homes, for example how thermally efficient they are, must also be better monitored....
 - Closing the energy use performance gap in new homes (the difference between how they are designed and how they actually perform) could save between £70 and £260 in energy bills per household per year....
 - From 2025 at the latest, no new homes should be connected to the gas grid. They should instead be heated through low carbon sources, have ultra-high levels of energy efficiency alongside appropriate ventilation and, where possible, be timber-framed.”⁴² This is the most challenging recommendation and further clarification regarding how Greater Manchester is preparing for this would be welcomed.
60. We welcome the work being undertaken through the [Urban Pioneer programme](#)⁴³ to support the natural environment through improved decision making.
61. Paragraph 165 in the NPPF⁴⁴ further outlines that sustainable drainage should be included for all major developments unless there is clear evidence why it's inappropriate. A range of recommendations were made for future action in the report [Achieving Sustainable Drainage](#)⁴⁵. This included an expectation that development requiring planning permission should include Sustainable Drainage Systems (SuDS) unless there is “clear and proportionate evidence” that such features are unfeasible or inappropriate. The RTPI contributed significantly to the research's scope and direction and will continue to work with our partners and members to help embed SUDs within planning policy, guidance and practice.

³⁹ Committee on Climate Change (2015), UK housing: Fit for the future? Available from: <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>

⁴⁰ Committee on Climate Change. Carbon budgets: how we monitor emissions targets. Available from: <https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/carbon-budgets-and-targets/>

⁴¹ Committee on Climate Change (2015), UK housing: Fit for the future? Available from: <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf> (Page 9)

⁴² Ibid.

⁴³ The Greater Manchester Natural Capital Group, Urban Pioneer Programme, Available from: <https://naturegreatermanchester.co.uk/project/urban-pioneer/>

⁴⁴ MHCLG (2019). National Planning Policy Framework. Available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf (page 47)

⁴⁵ Construction Industry Council (CIC) and the Landscape Institute (2019).,A review of delivery by Lead Local Flood Authorities. Available from: https://www.rtpi.org.uk/media/3194082/achieving-sustainable-drainage_jan19.pdf

62. The Framework would benefit from a reference to how it will contribute towards the achievement of the [UN's Sustainable Development Goals](#)⁴⁶. Recent [reports](#)⁴⁷ indicate the UK's poor performance in meeting the goals. City-region DPDs such as this provide an opportunity to encourage their delivery with a particular focus on SDG11 – “By 2030, make cities and human settlements inclusive, safe, resilient and sustainable”⁴⁸. UN policy advice also stresses the crucial role of local government and local actors in delivering the 17 Global Goals⁴⁹.

10. Health and sport

10.1 General comments on health and sport

63. We are concerned that the GMSF as currently drafted is a missed opportunity to emphasise the links between health and sport. The Framework notes that in April 2016, Greater Manchester became the first city-region in the country to receive devolved powers over its combined health and social care budgets⁵⁰. Although acknowledging that this falls largely outside the scope of the plan, we feel that further linkages between the planning system and public health outcomes could be promoted more in the Framework. For example health and encouraging physical activity could be a golden thread running throughout the Framework.

64. We support the reference to the [Greater Manchester moving programme](#)⁵¹ and the recognition that green infrastructure, urban green space and the good design of places are key to helping people of all ages to be more active and to live well.

65. The RTPI notes that planning in the broadest sense – from development management and infrastructure to the location of health and community services – can play a crucial role in creating environments that enhance people's health and wellbeing. [The RTPI Planning Horizons paper](#)⁵² on Promoting Healthy Cities considers how planning can promote healthy lifestyles. The GMSF could be bolder in clarifying that each of the Plan's themes have an impact on health and physical activity. Policy GM-E 6 on sport and recreation could be more locally focused to better reflect the specific situation in Greater Manchester.

66. The RTPI research paper [Settlement Patterns, Urban Form & Sustainability](#)⁵³ highlights evidence that larger settlements, with higher densities and mixed land use, can increase

⁴⁶ United Nations Development Programme. Available from:

<https://www.undp.org/content/undp/en/home/sustainable-development-goals.html>

⁴⁷ Smarter Communities. Media, The UK's “sub-standard” efforts on the UN Sustainable Development Goals, Available at: <https://smartercommunities.media/the-uks-sub-standard-efforts-on-the-un-sustainable-development-goals/>

⁴⁸ United Nations Development Programme. Available from:

<https://www.undp.org/content/undp/en/home/sustainable-development-goals.html>

⁴⁹ UN-Habitat and UNDP 2016, Roadmap for localizing the SDGs: implementation and monitoring at subnational level. Available from: <https://unhabitat.org/roadmap-for-localizing-the-sdgs-implementation-and-monitoring-at-subnational-level/>

⁵⁰ Greater Manchester Health and Social Care Partnership

<https://www.england.nhs.uk/integratedcare/integrated-care-systems/greater-manchester-ics/>

⁵¹ Greater Manchester moving programme. Available from <https://www.greatersport.co.uk/>

⁵² RTPI (2014), ‘Promoting Healthy Cities: why planning is critical to a healthy urban future’, Planning Horizons Vol. 3, RTPI,

http://rtpi.org.uk/media/1119674/rtpi_promoting_healthy_cities.pdf

⁵³ RTPI (2018) Settlement Patterns, Urban Form & Sustainability. Available from:

<https://www.rtpi.org.uk/media/2822766/settlementpatternsurbanformsustainability.pdf>

physical activity by promoting accessibility by walking, cycling and public transport. This improves physical and mental health, reduces absenteeism and reduces the prevalence and severity of chronic lifestyle-related diseases. The negative impacts of density on health can be mitigated through measures to limit car use and the provision of high-quality green space, equitably distributed across the urban area.

67. We would like to see more confidence in promoting Greater Manchester's reputation and what it has to offer at the regional, national and international level in the sporting arena. The contribution made by the city-region to both elite and grassroots sport in addition to providing world class sporting venues could be emphasised much more.
68. We welcome the statements on health and suggest that the following minor changes are included:
- Under **s. 9.25** we request that "Obesity, smoking, alcohol and **poor housing conditions** are all significant (health) issues"
 - **s.9.26** "As part of this a key aim is to better integrate health, **planning** and social care services..."