

Places for Everyone Submission

Places for Everyone Statement of Common Ground Signature and Individual Duty to Co-operate Log

Neighbouring Authority : Historic England

Historic England is a PfE duty to co-operate body and has been consulted during all stages of the preparation of the Plan. Set out below is a summary of the duty to co-operate activities to date and the current position between the PfE districts and Historic England.

Historic England's comments at the Vision Strategy and Strategic Growth Options stage sought greater recognition of the historic environment.

At the Draft GMSF Stage in 2016, Historic England commented that the historic environment of Greater Manchester had not been sufficiently recognised in line with national planning policy and guidance. In particular HE considered that the Framework's Vision and overarching Strategy failed to properly reference the historic environment or respond to the recommendations for action advocated in Historic England's "Historic Environment topic paper" which was published on the GMCA website alongside the GMSF 2016 draft plan. Furthermore, Historic England considered that many of the Framework's policies failed to satisfactorily acknowledge the conservation and enhancement of Greater Manchester's historic environment. Concerns were identified that there was an absence of any detailed assessment of the potential impacts upon the historic environment.

In relation to the GMSF 2019, Historic England raised concerns that the way in which the Revised Draft GMSF 2019 was structured did not show an appreciation of the area's heritage in line with national planning policy and guidance, Historic England considered this should run continuously throughout the GMSF. Concerns were raised in relation to the Framework's vision, objectives and overarching strategy which in Historic England's view failed to properly reference and deal with the historic environment. There was concern that the historic environment policy was not specific to Greater Manchester.

In addition concerns were raised that there were gaps in the evidence base underpinning the plan.

Further evidence prepared by or on behalf of the GMCA to support the Plan includes:

- Historic Environment Background Paper
- Archaeological and Built Heritage Assessment and Screening Exercise
- Site Level Heritage Assessments

In 2020, a meeting took place between Historic England and the GMCA to discuss the Statement of Common Ground, GMSF, High Street HAZ, Oldham Mills Strategy and GM

Textile Mills Strategy. It was agreed to set up additional Statement of Common Ground meetings and for the GMCA to share the Historic Environment topic paper, revised policy wording for Crimble Mill, Unity Mill and Land South of Hyde. Historic England agreed to share the draft Oldham Mills Strategy when available.

During the preparation of the PfE, regular meetings have taken place to discuss the content of the draft PfE. In March 2021, a formal meeting took place, to clarify the position following the regular catchup's and discussed the details of the approach to the historic environment in the PfE. This included the changes to the draft plan to address Historic England's concern around soundness/risk to the historic environment. The main areas discussed were Vision and lack of recognition given to the built and historic environment in the plan when considered against other sustainable development objectives. It was explained, there are difficulties around changing the vision, as it has been agreed to use the Greater Manchester Strategy vision by districts and the Mayor.

Also discussed, were site allocation policies – Historic England requested to see the HIA/HEA work specifically referenced consistently through the site allocation policies, where this was relevant. It was agreed that this would be considered, either within policy or as a footnote, but also important to make clear that further work would be required, the HIA is a starting point. It is considered the PfE has made relevant amendments to address this. An outcome of the meeting was Historic England agreed to send a table of proposed changes, ranked in order of importance in terms of soundness/risk to historic environment.

The approach to the historic environment has been updated in response to these issues and the collaborative activity.

The GMCA have revised the heritage policy in relation to additional evidence prepared in the Historic Environment Background Paper. Both the GMCA and Historic England accept that the evidence base prepared is adequate to underpin the heritage policy and allocations within the plan. With regard to changes to Policy JP-P 2 Heritage, the policy has been amended and an additional paragraph inserted to state proposals should be informed by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process.

During the Publication PfE consultation stage Historic England submitted comments to the PfE thematic policies, allocations and the IA supporting the PfE. They state that the plan goes some way to providing a positive strategy for the historic environment, however they consider there is still a need for further amends to the plan to create a positive strategy for the conservation and enjoyment of the historic environment.

Historic England's concerns included (but not limited to):

- The continued absence of the historic environment from the vision of the plan;
- Some of the policies (within the strategy chapter) failing to recognise the role the historic environment can play in achieving the goals of the plan;

- The compatibility of a number of environmental policies with the conservation and enhancement of the historic environment;
- Missing the opportunity that exists within Greater Manchester for heritage to contribute to economic and social prosperity including finding new uses for mills; and,
- The need for a stronger design policy within the plan.

It was recognised that following the preparation of evidence base, that amendments to some of the draft policies including the heritage policy, had resulted in positive improvements. Historic England also supported the allocations where wording referred back to the evidence base.

Since the end of the consultation period in October 2021, there have been discussions with Historic England to try to resolve as many of their concerns as possible. In January 2022, a letter from Historic England indicated it was their opinion that the GMCA on behalf of the PfE districts had met the Duty to Co-operate requirements set out under s33a of the Planning and Compulsory Purchase Act 2004.

As discussed at the meeting between Historic England and the GMCA on the 30th September 2022, the GMCA, on behalf of the nine districts, has submitted a number of proposed modifications to Chapter 9 in response to Historic England's concerns. These are set out in Document [M10.1](#), on the Examination website. The Table below sets out Historic England's position in relation to these modifications.

GMCA Hearing Statement M10.1 Response to IN9, Q10.1 Reference	Agree/disagree	Change to suggested GMCA modification
MM para 10.1 A.	Agree	No change
MM Para 10.1 B.	Agree	No change

GMCA Hearing Statement M10.1 Response to IN9, Q10.2 Reference	Agree/disagree	Change to suggested GMCA modification
MM Para 10.6 C.	Agree	No change
MM Para 10.6 D.	Agree	No change
MM Para 10.6 E.	Agree	No change
MM Para 10.6 F.	Agree	No change
MM Para 10.6 G.	Agree	No change
MM Para 10.6 H.	Agree in part	See suggested HE amendment below
MM Para 10.6. I.	Agree	No change
MM Para 10.6 J.	Agree	No change
MM Para 10.6 K.	Agree	No change

MM Para 10.6 L.	Agree	No change
MM Para 10.6 M.	Agree	No change
MM Para 10.6 N.	Agree	No change

Historic England consider that the GMCA's proposed modification at 10.6 (H) should be further modified as follows:

2. Ensuring that the heritage significance of a site or area is considered effectively in accordance with national policy in the planning and design process and opportunities for interpretation and local engagement are optimised;

The GMCA does not consider this proposed change to be necessary to make the plan sound.

In addition to the above, Historic England's Hearing Statement (M10.6) sets out a number of modifications they would like to see to the plan. In response to Question 10.1b Historic England requests insertion of a sentence at the end of the final paragraph of the policy concerning the analysis undertaken when preparing and determining planning applications to be deposited with the HER. The sentence may read as follows:

The results of any additional analysis, recording or excavation of heritage assets and/or sites of interest should be deposited with the Greater Manchester Historic Environment Record.

In respect of strategic management of the historic environment across Greater Manchester Historic England recommend more detail on cross-cutting themes that will help inform local plans, design codes etc. Historic England recommend the following text in the supporting justification to the policy in order that it provides a positive strategy for the historic environment in accordance with paragraph 190 of the NPPF and reflects the evidence base (Historic Environment Background Paper prepared by BDP 2020):

"Key elements of the historic environment include:

Industrial: including the mills and chimneys of the textile industry, other notable industrial related activities such as coal and lime extraction, brewing, hat making, glassworks, chemical and locomotive manufacture

Transport infrastructure: including historic roads and bridges (some of medieval origin), canals and railway infrastructure;

Places of social, political and cultural reform: Including sites relating to suffragettes, the campaign for suffrage (both male and female), the Co-operative and Temperance Movements.

Memorials, including statues, buildings and other structures such as fountains dedicated to individuals of national, regional and local significance, as well as memorial sites of community significance (e.g. cemeteries, War Memorials)

Sports and leisure: including public houses, swimming baths, billiard halls, cinemas and sport facilities

Places of worship: Including churches, chapels and other buildings, denominations and those built to serve the rapidly expanding population of the 19th century.

Large hall residences and their associated open spaces:

Including manorial and timber framed structures and moated sites.

Dwelling houses: Including workers housing, villa estates and suburban growth and model villages.

Significant archaeological sites: including those associated with Roman, medieval and industrial activities;

Open spaces: Including historic parks and gardens, squares, markets and landscape infrastructure such as railing gates, walls and monuments; and

Farmsteads and agricultural buildings.

Conservation areas: including town and city centres, extensive residential suburbs, industrial areas and cemeteries.”

The GMCA considers that this level of detail is not necessary to make the plan sound and is appropriately dealt with in the Historic Environment Background Paper, which is signposted from the PfE Plan.

Historic England

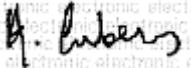
I agree to sign the Statement of Common Ground accompanying the Places for Everyone Plan. It was prepared on behalf of Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan (nine Greater Manchester authorities) who have agreed to prepare a Joint Development Plan Document.

I confirm that the nine Greater Manchester authorities listed above collaborated effectively over preparation of the Places For Everyone Plan and agree to continuous joint working as set out in this document.

The relevant statements my organisation is signing are set out below:

Statement No.	Statement Title
10	Heritage

Signature

Organisation	Historic England
Name	Henry Cumbers
Position	Senior Policy Adviser
Signature	
Date	13/12/2022