

Classification	Item No.
Open	

Meeting:	COUNCIL
Meeting date:	25 NOVEMBER 2020
Title of report:	SUBMISSION OF THE GREATER MANCHESTER SPATIAL FRAMEWORK
Report by:	Cllr. Eamonn O'Brien – Leader of the Council
Decision Type:	Key Decision
Ward(s) to which report relates	All

EXECUTIVE SUMMARY

Following consultation on two previous drafts in 2016 and 2019, Greater Manchester's Plan for Homes, Jobs and the Environment (the Greater Manchester Spatial Framework [GMSF]) has now progressed to the Publication stage.

This Publication GMSF is the version that each of the Greater Manchester districts believe should be submitted to the Government for Examination.

This report sets out some background information that gives a summary of what the GMSF is and why it is being produced. It then sets out a strategic overview of what the GMSF is planning for across Greater Manchester and highlights the key proposals for Bury in terms of homes, jobs, the environment, infrastructure and other background information. It also describes the key benefits that the GMSF will bring to Bury and examines the implications of Covid and the recently released Planning White Paper before setting out when and how consultation on the Publication GMSF will take place.

The Council's Cabinet met on the 11th November and approved GMSF: Publication Draft 2020 and to make it available for comment over an 8-week period between **1 December 2020 and 26 January 2021**. However, it has been indicated that the Cabinet Report will be formally called-in for consideration at Overview and Scrutiny, which at the time of writing had not happened.

This report is seeking approval from Council to formally Submit the GMSF to the Government should Cabinet approval to consult on the Publication version materialise and the consultation take place.

RECOMMENDATION(S)

It is recommended that Council:

1. Subject to Cabinet approving the GMSF: Publication Draft 2020 and supporting background documents for publication, agrees that these documents are submitted to the Secretary of State for examination pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 following the period for representations between 1 December 2020 and 26 January 2021; and
2. Delegates authority to the Lead Chief Executive, Housing, Homelessness and Infrastructure, in consultation with City Mayor, Paul Dennett, Portfolio Leader for Housing, Homelessness and Infrastructure to approve any minor or non-material changes to the GMSF: Publication Draft 2020 and background documents following the period for representations and prior to their submission to the Secretary of State for examination.

1 GREATER MANCHESTER SPATIAL FRAMEWORK – STRATEGIC OVERVIEW

- 1.1 There is a statutory requirement for local authorities to have an up-to-date development plan in place that identifies enough land to accommodate new homes and jobs for a growing population.
- 1.2 The Greater Manchester Spatial Framework (GMSF) is a plan that will meet this requirement. It seeks to provide the opportunities for inclusive economic growth, provide opportunities for provision of much needed homes and protect and enhance the natural environment. The full GMSF document is available via the Combined Authority's web site at <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/gmsf2020/the-plan/>.
- 1.3 The GMSF is not being prepared in isolation. It is one of the suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside other plans and strategies, including the Transport 2040 Delivery Plan, Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital Strategy and Cultural Strategy. Each of these plans is part of a coherent set of measures that will seek to meet our overall objectives.
- 1.4 The GMSF is a high level, strategic plan and does not cover everything that a district local plan would. Bury will still need to produce a Local Plan that will complement and help to take forward the GMSF's strategic policies and also provide more detailed policies to support the creation of locally distinctive high quality places/neighbourhoods. Work is already underway on Bury's Local Plan and progress on this will run alongside the GMSF process. However, the GMSF will need to advance ahead of the Local Plan to provide the strategic basis for local planning policies.
- 1.5 The GMSF is supported by a wide range of GM-wide and site-specific evidence that has been prepared to inform and support the content of the GMSF. Appendix 1 to this report sets out all relevant documents together with links to the Combined Authority's web site which holds these documents.
- 1.6 In addition, a series of Topic Papers have prepared for each of the proposed site allocations in Bury, These pull together the key findings from the evidence gathered in connection with each of the proposed site allocations. The Topic Papers for each of the proposed site allocations are attached at Appendix 2.

GMSF - Process

- 1.7 In November 2014, AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development

Plan Document (Joint DPD), called the Greater Manchester Spatial Framework (GMSF). Further, the recommendation was that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.

- 1.8 Over the course of 2014/15, the 10 authorities secured the approvals required to enable the GMSF to be prepared and for that preparation to be carried out by AGMA on their behalf. The first draft of the GMSF Joint DPD was published for consultation on 31st October 2016, ending on 16th January 2017. The consultation generated significant interest and over 27,000 responses were received.
- 1.9 A further consultation on the Revised Draft GMSF took place between January and March 2019 and over 17,000 responses were received at that stage. Since the consultation closed, work has been underway to analyse the responses (a consultation summary report was published in October 2019), finalise the evidence base and prepare a further version of the plan.
- 1.10 Progress on the GMSF was delayed due to the Covid-19 pandemic but it was agreed that:
 - The GMSF should continue to be progressed as a Joint Development Plan Document of the 10 authorities;
 - The next version of the plan would be the Publication Plan; and
 - Consultation on the Publication Plan would start in late 2020.
- 1.11 The 'Publication stage' is a formal consultation on the draft joint DPD pursuant to Reg. 19 of the Local Planning Regulations. It is a statutory stage that provides an opportunity for organisations and individuals to submit their final views on the content of the plan. The decision to 'Publish' the draft joint DPD is an Executive decision for the GM local authorities.
- 1.12 Following consultation on the Publication Plan, the draft GMSF and the representations made at the Publication stage are sent to the Secretary of State – this is called the 'Submission stage', pursuant to Reg. 22 of the Local Planning Regulations. Upon completion of the consultation on the Publication early in 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in mid- 2021. Submission 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 four tests of soundness¹ will be taken into account by the Inspector(s). If major new issues arise at the Publication consultation stage there would need to be further consultation prior to any submission of the plan.

¹ As set out in NPPF para 35

- 1.13 Following submission, an Examination in Public takes place at which a Planning Inspector(s) will consider the joint DPD and representations made in respect of it and determine whether the DPD is capable of being adopted, either with or without amendments.
- 1.14 Assuming that the document is capable of adoption, whether with or without amendments, the ultimate decision to adopt must be taken by each of the 10 Full Councils.
- 1.15 For Bury, the policies and proposals set out in the Publication GMSF will replace some of the current Unitary Development Plan (UDP) policies when formally adopted and will form part of Bury's statutory development plan. A list of the UDP policies that will be replaced by the GMSF can be found in Appendix 3. The Local Plan will then provide more detailed local policies, replacing the remaining UDP policies.

GMSF 2020: Publication Plan

- 1.16 The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Publication Plan 2020 (GMSF 2020) is our plan to manage growth so that Greater Manchester is a better place to live, work and visit. It will:
- set out how Greater Manchester should develop up to the year 2037;
 - identify the amount of new development that will come forward across the 10 districts, in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
 - identify the important environmental assets across the conurbation which will be protected and enhanced;
 - allocate sites for employment and housing outside of the urban area;
 - support the delivery of key infrastructure, such as transport and utilities;
 - define a new Green Belt boundary for Greater Manchester.
- 1.17 The Publication GMSF includes a spatial strategy which seeks to deliver sustainable and inclusive growth through three key elements:
- **Significant growth in jobs and housing at the core** – continuing development in the 'core growth area' encompassing the city centre and beyond to the Etihad in the east, through to the Quays, Trafford Park and Port Salford in the west. The majority of commercial employment growth and a significant amount of the overall housing supply is proposed in this area;

- **Boosting the competitiveness of the northern districts** – provision of new employment opportunities and a commitment that collectively the northern districts meet their own local housing need;
- **Sustaining the competitiveness of the southern districts** – supporting key economic drivers, such as around Wythenshawe hospital and the Airport, realising the opportunities offered by national infrastructure investment, e.g. HS2, whilst recognising the important green infrastructure assets in the area.

Statement of Common Ground

- 1.18 One key supporting document will be a strategic Statement of Common Ground. This will set out the key matters between the ten authorities agreeing on the distribution and quantum of development contained in the Publication Plan. It will also deal with any matters with other organisations that require to be agreed to enable the Publication Plan to be submitted next year. There may be a need for additional Statements of Common Ground to deal with specific matters linked to the proposed site allocations and these will be the responsibility of the relevant local authority to draw up if required. The recommendation requests that responsibility for this is delegated to the Director of Economic Regeneration and Capital Growth.

2 PLAN FOR HOMES

- 2.1 It is important that we plan to provide a range of new homes to accommodate the housing needs of a growing population, including much needed affordable homes.
- 2.2 The Government has introduced a standard methodology for calculating Local Housing Needs (LHN) to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. If insufficient new homes are provided to meet increasing demand, then there is a risk that affordability levels will worsen and people will not have access to suitable accommodation that meets their needs. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.
- 2.3 Applying the current methodology means that a minimum of 179,078 new homes will be required across Greater Manchester over the plan period (2020-2037).
- 2.4 The plan sets out Greater Manchester's commitment to deliver a significant proportion of these as affordable housing - 50,000 units over the plan period, including 30,000 for social rent.

Plan for Homes – Bury

- 2.5 For Bury, the Government's standard methodology gives a Local Housing Need (LHN) target of 10,217 homes over the plan period (601 homes per year). This is the baseline starting point for a plan to consider.
- 2.6 The GMSF process allows for a redistribution of Bury's LHN within the conurbation to reflect the availability of land or to reflect strategic policies. As a result, Bury has been able to reduce the baseline housing target over the plan period to 7,670 homes (average of 451 homes per year).
- 2.7 Bury's proposed housing target in the GMSF therefore represents 4.2% of the total Greater Manchester housing target, which is the lowest in Greater Manchester.
- 2.8 This is a reduction of 2,547 units on the Governments minimum LHN for the Borough. The GMSF target is therefore 75% of the LHN, which is a fall from 82% on the previous version of the GMSF.
- 2.9 However, as a Borough, we do not have enough land within the urban area or on brownfield sites to meet even this reduced target. Bury's Strategic Housing Land Availability Assessment identifies that there is only enough land to accommodate 3,963 homes. This supply largely consists of brownfield sites within the existing urban area, including the potential development sites within our town centres and other brownfield sites such as the former East Lancashire Paper Mill site and the former Tetrosyl site at Bevis Green in Walmersley.
- 2.10 This supply shortfall means that the following Green Belt sites are proposed to be released through the GMSF to meet the reduced target as well as providing a defensible buffer on top of the supply.

Site	No. of homes within the plan period
Castle Road, Unsworth (Northern Gateway)	200
Simister/Bowlee (Northern Gateway)	1,350
Walshaw	1,250
Elton Reservoir	1,900 (further 1,600 post plan)
Seedfield	140
Total	4,840

- 2.11 Together, the baseline supply and the proposed housing within the plan period on Green Belt sites are estimated to have the capacity to deliver around 8,803 units. This provides a 14.8% buffer on top of the supply to allow for sites not coming forward as envisaged over the plan period. Buffers are a standard requirement in development plans to provide flexibility in the supply and there is a 17% buffer against the total Greater Manchester target.
- 2.12 The GMSF proposals include the release of Green Belt land beyond the plan period for residential development at the Elton Reservoir site (which has been consulted on in the previous two iterations). This is because the site is key to delivering significant upfront investment into essential strategic infrastructure and the site needs the long term certainty on the scale of development to withstand the costs. The natural development of this site, using standard build out rates, will mean that the scale of delivery will extend beyond the plan period.
- 2.13 It should be noted that if the GMSF had a baseline housing target for Bury that reflected the minimum LHN (10,217), there would still be a need for a buffer to be identified on top of this. At 14.8% this would equate to an additional 1,514 units. It would still only be feasible for the Elton Reservoir site to deliver 1,900 within the plan period, with 1,600 post plan. The total housing figures (including post-plan) would therefore equate to 13,331 as opposed to the current GMSF figures of 10,406 (an increase of 2,925). This is illustrated in the diagram below.



- 2.14 Importantly, the reduction in Bury's housing target within the Publication GMSF means that the amount of Green Belt that is proposed to be released for residential development has been reduced by 192 hectares since the 2019 draft GMSF. This has been met through the removal of the Whitefield site (600 units) and a significant reduction of land in the Simister / Bowlee allocation (reduction of 700 units).

Strategic Sites

- 2.15 Not only does the GMSF help to reduce the amount of Green Belt needed to meet the local housing need in Bury, it also means that the sites that are proposed are those that deliver strategic benefits over the longer term. This is because the GMSF gives Bury a lower housing target in the early years of the plan which will give us time to bring forward and develop essential infrastructure in and around the strategic sites proposed (as well as our limited supply of brownfield sites). This includes a strategic link road through the Elton site that will provide much needed resilience and extra capacity on our highway network, as well as public transport and education investments.
- 2.16 A higher target earlier in the plan period would require additional small sites that could be brought forward in the short term. However, such sites would not be able to deliver any tangible new infrastructure provision of the scale needed.

Type of Housing

- 2.17 During the previous GMSF consultations there was a general acceptance that the Borough needs more housing of all types and sizes and across a range of tenures. Whilst we would like to meet the full housing needs of all of our residents over the plan period, the constraints of the Green Belt and ability to deliver infrastructure means that there are significant challenges in doing so. It is considered that the GMSF strikes the right balance in providing new homes and infrastructure, whilst reducing the amount of Green Belt released.
- 2.18 The housing sites proposed through the GMSF will include a mix of house types, sizes and tenures. This will include 1 and 2 bedroom properties as well as 3 and 4 bedroom properties.
- 2.19 It will also include a significant amount of affordable housing in line with local policy requirements designed to meet the needs identified in Bury's Housing Needs Survey and the emerging Housing Strategy. It is estimated that, in addition to provision of affordable housing provided on sites within the existing land supply, the sites identified in the GMSF will deliver over 1,200 affordable homes during the plan period (25% of the total homes proposed in the GMSF).

- 2.20 New housing will also include provision for special needs housing, such as accommodation for the elderly.

3 PLAN FOR JOBS

- 3.1 Economic growth is central to the overall strategy for Greater Manchester. It will be essential to raising incomes, improving health and quality of life and generating the finances to deliver better infrastructure, services and facilities.
- 3.2 Greater Manchester has the opportunity to lead with the 'levelling up' agenda by helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole.
- 3.3 As such, the GMSF supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the longer-term. However, delivering these high levels of growth means that Greater Manchester will need to continue to invest in the sites and critical infrastructure that will make it an even more attractive place for businesses to invest, bringing high-value, well paid jobs, to the city region, and supporting the continued progress towards a low-carbon economy.
- 3.4 In pursuit of this, the GMSF proposes at least 2,500,000 sq.m. of new office floorspace and at least 4,100,000 sq.m. of industrial and warehousing floorspace across Greater Manchester over the plan period.

Plan for Jobs – Bury

- 3.5 Over recent years, the northern areas of Greater Manchester, including Bury, have seen relatively low levels of growth overall compared to other parts of the city region, particularly in the south of the sub-region. In Bury, a major contributing factor to this has been an inadequate supply of employment land which has undoubtedly held back the Borough's economy due to the lack of opportunities for attracting new inward investment and for the Borough's existing businesses to grow.
- 3.6 If these disparities between the northern and southern areas increase, this will be harmful not only to the prospects for the north but also to those of Greater Manchester as a whole. As a result, a key aim of the GMSF is to significantly boost the competitiveness of and economic output from the northern parts of Greater Manchester to deliver more balanced and inclusive growth across the sub-region. As a northern Borough, Bury has a key role to play in achieving this aim.
- 3.7 In terms of office development, 40,206 sq.m. is proposed in Bury over the plan period. This equates to 1.2% of the total proposed for Greater

Manchester reflecting the fact that the majority of office development will take place in the inner core areas of Manchester and Salford.

- 3.8 However, it is through industrial and warehousing development that Bury is well placed to play a more significant role and this will not only help Bury to contribute towards an improved economic output from the north of the city region but will also help to address the longstanding local issue around the severe lack of land for industrial and warehousing development in Bury.
- 3.9 At present, the Borough has by far the lowest existing baseline supply of land for industrial and warehousing of any Greater Manchester district with a supply that is capable of accommodating only 10,231 sq,m, of floorspace - equating to only 0.5% of Greater Manchester's total existing supply. This has been a longstanding issue for Bury that has, without doubt, held back the Borough's economy and has led to a number of Bury companies having to relocate elsewhere due to a lack of opportunity to expand or relocate within the Borough.
- 3.10 The GMSF seeks to increase the supply of industry and warehousing in Bury through the proposals for employment-led development at the Northern Gateway (Heywood/Pilsworth). It is estimated that the full development of this site across Bury and Rochdale could generate 1.2 million sq.m. of industrial and warehousing floorspace (including an Advanced Manufacturing Park), creating a large amount of new job opportunities that would be highly accessible to Bury residents.
- 3.11 Of this 1.2million sq.m, around 856,000 sq.m. is proposed for Bury – 491,000 sq.m. of which is expected to come forward within the plan period. Together with the existing supply of 10,231sq.m. the addition of the Heywood/Pilsworth site would give Bury a total supply of industrial and warehousing land capable of accommodating 501,231 sq.m within the plan period with further potential beyond 2037.
- 3.12 The total proposed supply of 501,231 sq.m. would significantly increase Bury's contribution to 11.6% of Greater Manchester's total supply of industrial and warehousing floorspace within the plan period.
- 3.13 The remaining potential (365,000sqm) is expected to follow post-plan.
- 3.14 At 310 hectares of land, these employment proposals represent the largest proposed release of land in Bury under the GMSF (net Green Belt loss in Bury is proposed to be 520 hectares).

4 PLAN FOR THE ENVIRONMENT

- 4.1 The GMSF is not just about accommodating development. It also includes a range of policies designed to protect and enhance Greater Manchester's many and varied green spaces and features which are used in many different ways and afforded many different values by the people who live, work or visit the city-region.
- 4.2 The GMSF supports the important role of Greater Manchester's natural assets by:
- Valuing the special qualities and key sensitivities of Greater Manchester's landscapes;
 - Seeking to protect and enhance Greater Manchester's network of green and blue infrastructure;
 - Seeking a significant overall enhancement of biodiversity and geodiversity; and
 - Seeking to maintain a new and defensible Green Belt which will endure beyond this plan period.
- 4.3 Furthermore, the GMSF supports wider strategies around clean air, walking and cycling and underpins Greater Manchester's ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 and to keep fossil fuels in the ground.

Plan for the Environment – Bury

- 4.4 The GMSF's strategic environmental policies are high-level and generic policies that will, where applicable, apply to development proposals in Bury. They cover a wide range of environmental issues, include policies relating to:
- Carbon reduction and energy;
 - Flood risk;
 - Clean air;
 - Landscapes;
 - Green infrastructure;
 - River valleys and waterways;
 - Lowland wetlands and mosslands;
 - Uplands;
 - Urban green space;

- Trees and woodlands;
- Biodiversity and geodiversity; and
- Heritage.

4.5 These policies will either replace some of the current local policies contained in Bury's UDP and/or provide additional policy support for the protection of the Borough's built and natural environments.

5 PLAN FOR INFRASTRUCTURE

- 5.1 The GMSF will need to be supported by significant investment in the sub-region's infrastructure including roads, public transport, energy and utilities as well as schools and health facilities.
- 5.2 Future climate change pressures will also require the city-region to adapt to bigger shocks and stresses, such as increased heat, drought and flood risk.
- 5.3 The quality, distribution and resilience of infrastructure will be important in ensuring that the GMSF is successfully implemented and delivered. Infrastructure is essential to support the delivery of the GMSF's vision and objectives.
- 5.4 The capacity of the utility network to accommodate increased demand is considered generally robust. However, an increasing population, economic growth and changes in technology will increase demand, both for new and existing infrastructure. Combined with a backlog of capital investment, historically low levels of investment compared to other countries and continually growing and changing expectations for infrastructure, requirements over the next thirty years will be substantial.
- 5.5 As mentioned, the GMSF is one of a suite of complementary documents designed to support the long-term aspirations for Greater Manchester. This includes the Greater Manchester Infrastructure Framework which is a precursor to the development of a Greater Manchester Infrastructure Strategy. It frames the key issues and priorities which the Infrastructure Strategy should seek to address.
- 5.6 A Greater Manchester Strategic Infrastructure Board has been established which includes representatives from United Utilities, Electricity North West, Cadent, Environment Agency, Transport for Greater Manchester as well as GMCA officers and Chief Resilience Officer. The Strategic Infrastructure Board will consider and respond to the issues and challenges raised by the Infrastructure Framework and will help shape the Infrastructure Strategy.
- 5.7 Importantly, the Transport for Greater Manchester (TfGM) 2040 Implementation Plan has been drafted and this will seek to deliver some of the

key highway and public transport infrastructure interventions associated with some of the GMSF proposals and other developments.

Plan for infrastructure - Bury

5.8 The GMSF identifies a range of physical and social infrastructure interventions that will be required to support the new development proposals in Bury, including:

- New link roads – to improve connectivity and traffic movement and help to address issues on the existing road network. For example, the Elton Reservoir site will require the provision of a strategic spine road connecting Bury and Bolton Road (A58) to Bury Road in Radcliffe in order to provide an alternative route to Bury Bridge/around Bury Town centre.
- Junction improvements – to improve accessibility and traffic movement, significant junction improvements and reconfiguration (in and around sites) are required. Whilst there will be a more obvious requirement for improvements to directly support and mitigate for the impact of new traffic associated with the development sites, there will also be a requirement to implement improvements further afield. Improvements will be required on both the strategic road network (e.g. motorway junctions) as well as those on the local road network.
- Public transport – including improving access to public transport, providing more sustainable transport options through the provision of a new Metrolink station at Warth to support the development of the Elton Reservoir area and a potential tram-train operation along the route of the East Lancashire Railway between Bury and Rochdale to improve access to the proposed employment development at Heywood/Pilsworth.
- Pedestrian/cycle routes – to allow effective integration between the sites and their surrounding communities there will be a need for improved linkages and connections for pedestrians and cyclists.
- Education – the provision of primary schools to specifically support development proposals for Walshaw, the Elton Reservoir area and the Simister/Bowlee site; and contributions towards improving capacity at existing schools.
- Flood Risk – the proposed development sites will need to ensure that the developments would not pose any additional risk of flooding, and where possible, seek to reduce flood risk. This includes fluvial and surface water flood risk and sites will need to incorporate sustainable urban drainage systems to address this issue.
- Healthcare - Additional healthcare provision where required.

- Other infrastructure - Provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points.

5.9 These infrastructure requirements will be embedded within the GMSF's statutory planning policies for each of the proposed site allocations and any planning applications for development on these sites will need to be in line with these policy requirements for them to be approved. Planning conditions and legal agreements will ensure that the necessary infrastructure is delivered at an appropriate stage in the development.

6 PLAN FOR GREEN BELT

6.1 The Publication GMSF proposes a limited release of a Green Belt for both housing and employment. The net loss of Green Belt across Greater Manchester is 1,939 ha. This represents a reduction of over 60% (60.3%) from what was proposed in the first draft of the GMSF in 2016 and a 19% reduction from 2019 draft. This has been achieved through:

- Reducing the number of proposed sites;
- Reducing the extent of Green Belt release within sites; and
- Proposing a limited number of Green Belt additions.

6.2 The current Greater Manchester Green Belt covers 46.9% of the land area of Greater Manchester. The proposals in the Publication GMSF would reduce this by around 1.5% meaning that 45.3% of Greater Manchester land area would remain designated Green Belt.

Plan for Green Belt – Bury

6.3 The sites in Bury that have been proposed for employment and housing development in the GMSF have evolved as the GMSF has progressed through its various stages of preparation. These changes to the sites have been made to reflect new and updated evidence and public views expressed in response to consultation on the previous drafts.

6.4 The changes have resulted in a significant reduction in the proposed net loss of Green Belt in the current Publication GMSF compared to what was originally proposed in the first draft in 2016 and what was subsequently proposed in the revised draft in 2019.

6.5 The original 2016 draft proposed the release of 1,210 hectares (20%) of the Borough's Green Belt. However, the subsequent removal of sites at Baldingstone and Holcombe Brook; reductions to the loss of Green Belt at Walshaw, Elton and Heywood/Pilsworth; and a number of new additions to the Green Belt meant that the revised 2019 draft involved a reduced net loss of 714 hectares (12%) of the Green Belt.

- 6.6 Further revisions have been made to the sites proposed in the Publication GMSF. In particular, the site at Whitefield has now been removed and there has been a significant reduction in the extent of the site at Simister/Bowlee which retains Simister Village within the Green Belt. These additional amendments mean that the Publication GMSF is now proposing a net loss of 520 hectares (9%) of the Borough's Green Belt.
- 6.7 The majority of the proposed Green Belt release in the Borough is for employment development at the Northern Gateway site, which accounts for 310 hectares of the total 520 hectares proposed for release.
- 6.8 Bury's Green Belt currently covers 5,904 hectares of the total land area of the Borough (i.e. 59.5%). The proposals in the Publication GMSF to reduce this by 520 hectares would mean that 5,384 hectares would remain as Green Belt land. This would mean that 54.5% of the Borough would remain Green Belt land, which is the third highest proportion of any district in Greater Manchester, behind only Rochdale and Wigan.

7 SITE SELECTION

- 7.1 In November 2015, a 'Call for Sites' exercise was launched whereby local residents, businesses, land owners and developers were invited to identify sites that they thought could be suitable for housing or employment development.
- 7.2 Following the 'Call for Sites', all sites were assessed against a series of key principles to determine their suitability as potential sites to be included within the GMSF.
- 7.3 The approach to site selection used for the 2016 draft has been reviewed and refined at each subsequent stage. This was partly in response to comments raised during consultation, but also because the preparation of a development plan is, by its very nature, an iterative process that needs to evolve and be justifiable as 'an appropriate strategy' in accordance with paragraph 35 of the National Planning Policy Framework.
- 7.4 Furthermore, it should also be noted that, as part of the process of preparing the drafts of the GMSF, it has also been necessary to consider all the evidence base to ensure that sites are deliverable. The site selection process is just one part of that evidence.
- 7.5 In Bury, the Publication GMSF proposes a small number of large sites. In doing so, the sites are of sufficient scale for them to include the provision of essential, strategic infrastructure.

- 7.6 Pursuing an alternative approach of identifying a large number of small sites would mean that the sites would be unable to deliver the scale of infrastructure required to support the overall level of development needed which, in turn, would lead to an unacceptable increase in pressure on existing infrastructure. As indicated above, the GMSF gives Bury a lower housing target in the early part of the plan period to give these sites the time to bring forward the necessary infrastructure.
- 7.7 In terms of their location, Bury's sites are largely contained within or well-related to the existing urban area which helps to promote 'inward growth' as opposed to urban sprawl. This will enable any development to build on opportunities to access or improve existing infrastructure.

8 IMPLICATIONS OF COVID-19

- 8.1 Covid-19 has had a major impact on the way people live and work over the shorter term and there remains a degree of uncertainty over its impact in the long term.
- 8.2 However, 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 continue to live through the pandemic.
- 8.3 The need for a spatial plan to provide certainty and guide development, investment and infrastructure has never been stronger. There is 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. The Government has published updated planning guidance, including temporary measures for the planning system (<https://www.gov.uk/guidance/coronavirus-covid-19-planning-update>).
- 8.4 In terms of Local Plans, the guidance is clear that the Government want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the Government's aspirations to have up-to-date plans in place across the country by 2023.
- 8.5 The GMSF is an essential building block of the city-region's long term success and recovery. In short, it will demonstrate what 'building back better' means spatially for Greater Manchester.
- 8.6 To assist in progressing plans, Government has introduced temporary arrangements through the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020 which change the requirements to make certain documents available for inspection and on request. These regulations make temporary changes to how documents are

required to be made available under regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations"). They temporarily remove the requirement on a local planning authority to make documents available for public inspection at the authority's principal office and at such other places as the authority considers appropriate. They also make temporary changes to regulation 36 of the 2012 Regulations to remove the requirement on a local planning authority to provide hard copies of documents made available under regulation 35. Documents are still required to be made available on the local planning authority's website.

- 8.7 These temporary arrangements are in place until 31 December 2020 but it is expected that the Government will extend these, particularly in light of current circumstances with Covid-19. Nevertheless, the situation will be kept under constant review and, if necessary, arrangements will be adapted to respond to any change in circumstances.

9 CONSULTATION ON THE PUBLICATION GMSF

- 9.1 Following consultation on two previous drafts of the GMSF in 2016 and 2019, the document has now progressed to the Publication stage which is effectively the final draft of the plan and that which each of the Greater Manchester districts consider should be the final plan to be submitted to Government.
- 9.2 It is now proposed that the Publication GMSF should be subject to a further eight-week period of public consultation between **1 December 2020 and 26 January 2021**.
- 9.3 The GMSF and key supporting evidence will have been in the public domain for over five weeks before the start of formal consultation, allowing people to view and familiarise themselves with the content.
- 9.4 This is an important consultation stage in the plan-making process because it will be the comments made at this stage that will be submitted to Government and considered by the appointed Planning Inspector(s) as part of the Examination of the plan. Comments made at previous stages have been used to inform the production of the plan to this point and these will also be summarised in a Consultation Report as part of the submitted documentation.
- 9.5 Whilst anyone can make a representation on any point in the plan, only those pertaining to the four tests of soundness set out in the National Planning Policy Framework (NPPF) will be taken into account by the Planning Inspectorate i.e. whether the plan 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 NPPF.

9.6 The Government has been clear that the challenge posed by Covid-19 is not a sufficient reason to delay plan preparation. The Council has recently consulted on revisions to its Statement of Community Involvement to respond to current Covid-19 guidance that affects how we would normally consult including, for example, holding of face-to-face community events or the provision of physical documents for inspection in public buildings.

9.7 However, effective community engagement will still be promoted by means which are reasonably practicable. Government guidance strongly encourages the use of online engagement methods. Engagement strategies are being prepared which consider the use of the following:

- virtual exhibitions;
- digital consultations;
- video conferencing; and
- social media and online chat functions.

9.8 Reasonable steps will also 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:

- Posting information on request (e.g. particular information on a site);
- Deposit points for the plan (subject to restrictions);
- Engaging sections of the community, that do not have internet access, through representative groups rather than directly;
- 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 (depending on restrictions at that point in time).

- 9.9 Given the uncertainty around the type of local/national lockdown which may be in place at the time the consultation, different methods will be developed to respond to different levels of social distancing/public interaction which may be possible.

What happens following consultation?

- 9.10 Following this consultation, it is proposed that the Publication GMSF be formally submitted to the Government alongside all supporting evidence and the Government will then appoint a Planning Inspector (or a panel of Inspectors) to undertake an Examination of the GMSF.
- 9.11 Importantly, all representations made at the Publication stage will also be submitted to the Government and these will be considered by the Inspector(s) as part of the Examination of the plan (where the representation is considered relevant to the NPPF's four tests of soundness).
- 9.12 An Examination in Public will then take place at which a Planning Inspector will consider the GMSF, its supporting evidence and representations made in respect of it and determine whether it is capable of being adopted, either with or without amendments.
- 9.13 Assuming that the GMSF is found to be capable of adoption, the ultimate decision to adopt it must be taken by each of the 10 Full Councils.

10 SUMMARY

- 10.1 It is considered that working with our Greater Manchester colleagues through the GMSF brings a number of important advantages:
- **An up-to-date plan** – Bury's current development plan is the Unitary Development Plan which was adopted in 1997 and is now significantly out of date. The Council has twice tried and failed to get a replacement plan in place over that time but this met with significant challenge as it did not meet housing needs. The Government has indicated that it will intervene in and potentially take over the plan-making process where local authorities do not have an up-to-date plan by December 2023 – which could remove local controls over plan-making. The GMSF will enable Bury to avoid these sanctions by meeting its statutory requirement to have an up-to-date plan in place covering strategic planning issues.
 - **A stronger local economy** – One of the key aims of the GMSF is to significantly boost the competitiveness and economic output from the north of the conurbation in order to address the current imbalance in the Greater Manchester economy. The proposal at the Northern Gateway (Heywood/Pilsworth) is key to the delivery of this objective. The jobs and investment generated from this site will help to create a sustained reduction

in inequalities and improve the lives of our residents whilst also helping in post-Brexit and post-Covid recovery.

- **Significant infrastructure investment** - In contrast to identifying smaller, short-term sites, the GMSF also allows us to bring forward a small number of large, strategic sites that can pave the way for significant investment in the physical and social infrastructure required to support development.
- **Reduced impact on the Green Belt** - Collaborative working on the GMSF by the ten Greater Manchester districts has allowed for a redistribution of housing needs to enable more development to be focussed in more sustainable locations, such as in the inner core areas of Manchester and Salford. This has enabled Bury to off-set 2,547 homes from our Local Housing Need to other districts which would otherwise have to be accommodated within the Borough. This has allowed Bury to reduce the amount of Green Belt land required for development.

10.2 It is important to recognise that if the GMSF did not exist or if Bury were not a participant in the process, the strategic matters that are currently dealt with through the GMSF would still need to be covered by the Local Plan. However, the advantages of collaborative working outlined above would be lost.

Other alternative options considered

For Bury to withdraw from the GMSF process and to only produce a Local Plan – the implications of this option are set out in the report.

Community impact

The GMSF is about providing the right homes, in the right places, for people across our city region, including Bury, up to 2037. It's also about creating jobs and improving infrastructure to ensure the future prosperity of Greater Manchester and Bury.

Whilst one of the key purposes of the GMSF is to make provision for the homes and jobs needed across Greater Manchester, it is also about establishing a framework for reducing inequalities, improving the lives of our residents, and transforming Greater Manchester into the world-leading city-region for the benefit of Greater Manchester's communities.

Equality Impact and considerations:

Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to -

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;*
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;*
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.*

The public sector equality duty (specific duty) requires us to consider how we can positively contribute to the advancement of equality and good relations, and demonstrate that we are paying 'due regard' in our decision making in the design of policies and in the delivery of services.

Equality Analysis	<i>Please provide a written explanation of the outcome(s) of either conducting an initial or full EA.</i>
An Equality Analysis has been undertaken in respect of the Manchester Spatial Framework and the outcomes of this analysis can be seen at Appendix 4.	

**Please note: Approval of a cabinet report is paused when the 'Equality/Diversity implications' section is left blank and approval will only be considered when this section is completed.*

Assessment of Risk:

The following risks apply to the decision:

Risk / opportunity	Mitigation
Potential risk to the public and council staff in holding public consultation during the Covid-19 pandemic.	In line with government guidance, the Council will temporarily cease forms of engagement that involve public gatherings and/or face-to-face contact whilst social distancing measures are in place. In the interim period alternative methods of engagement will be utilised - for example holding

	virtual exhibitions, digital consultations, video conferencing and utilising social media platforms.
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Consultation:

See section on consultation within the main body of the report.

Legal Implications:

The Greater Manchester Spatial Framework will form part of the statutory development plan for each of the Greater Manchester districts and, alongside the emerging Bury Local Plan, will replace the Bury Unitary Development Plan. All development plans must be prepared in accordance with statutory processes. This report sets out an overview of the latest publication Greater Manchester Spatial Framework, highlighting some of the key proposals in Bury and seeks approval for the document to be subject to a formal period of consultation to ensure that all interested parties have an opportunity to make their views known before these are submitted to the Government to be considered as part of the Examination of the GMSF. The formal submission of the GMSF will have to be approved by the Council as part of the Policy Framework. There are no other legal concerns at this point, but if the proposal is approved, further detailed input will be required from the Council Solicitor in due course.

The legislative and constitutional requirements for the preparation of a joint Development Plan Document (DPD) are set out in the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. These have been complied with and legal advice provided at all stages.

The joint DPD will now be the subject of two further stages as it will be submitted to the Secretary of State for independent examination under the 2004 Act, along with the documents prescribed by the 2012 Regulations and prior to submission to the Secretary of State, it must be published and representations invited, pursuant to the 2012 Regulations. This will involve, a formal consultation on the draft.

The decision to publish the draft joint DPD is an executive decision for all of the GM local authorities and in Bury must be made by Cabinet. At the end of the consultation period, the draft joint DPD and all representations received are then sent to the Secretary of State. This final submission is likely to happen in summer 2021 and requires approval to submit of each of the 10 Full Councils of the GM local authorities, as it is a Council decision to submit the joint DPD.

Financial Implications:

This report does not commit the Council to any financial decisions but seeks to establish a strategic planning policy framework for Greater Manchester, including Bury. Implementing any schemes aligned to the framework will be subject to decision making at that time which will include a full assessment of the financial implications including affordability that will take into account costs and additional revenue income that may be generated.

Report Author and Contact Details:

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Background papers:

- The Greater Manchester Spatial Framework: Publication Draft 2020.
- Key supporting evidence.

Please include a glossary of terms, abbreviations and acronyms used in this report.

Term	Meaning
Greater Manchester Spatial Framework (GMSF)	The GMSF is Greater Manchester's Plan for Homes, Jobs and the Environment. It is a statutory Development Plan Document that provides the strategic basis for planning future growth and development in Greater Manchester up to 2037.
Brownfield Land	Brownfield land is land that has previously been developed. It might be overgrown and look like a green space, still have buildings on it or be derelict.
Greenfield Land	Greenfield sites are undeveloped green spaces found in both urban and rural areas. Greenfield sites are not all found within the Green Belt. A park in an urban

	area, for example, would also be defined as a greenfield site.
Local Housing Need (LHN)	The minimum number of homes needed in a particular area calculated using the Government's standard methodology.