

Classification	Item No.
Open	

Meeting:	Overview & Scrutiny Committee – 21 st July CABINET – 22 nd July
Meeting date:	21/22 July 2021
Title of report:	PUBLICATION OF THE 'PLACES FOR EVERYONE' JOINT PLAN
Report by:	Cllr. Eamonn O'Brien – Leader of the Council
Decision Type:	Key Decision
Ward(s) to which report relates	All

Executive Summary

Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared. This was Greater Manchester's Plan for Jobs, Homes & the Environment (known as the Greater Manchester Spatial Framework - 'GMSF'). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process. However, the decision at Stockport Council's meeting on 3 December to not submit the GMSF 2020 to the Secretary of State for independent examination following the consultation period, and the subsequent resolution at its Cabinet meeting on 4 December not to publish the GMSF 2020 for consultation, in effect signalled the end of the GMSF as a joint plan of the ten districts.

S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing,

provided that the plan has “substantially the same effect” on the remaining authorities as the original joint plan.

This report presents proposals for the Publication of a joint DPD of the nine remaining Greater Manchester (GM) districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan), to be known as ‘Places for Everyone’ (Pfe).

It sets out some background information in terms of how the plan has progressed from the GMSF to Pfe 2021 within the context of planning law and Regulations, identifying the key differences between ‘Places for Everyone’ 2021 (Pfe 2021) and GMSF 2020 and setting out an assessment of the necessary proposed changes.

It gives a summary of what Pfe 2021 is and why it is being produced before setting out a strategic overview of what it is planning for across Greater Manchester and highlighting the key proposals for Bury in terms of homes, jobs, the environment, infrastructure, Green Belt and other background information. It also describes the key benefits that the Pfe Joint Plan will bring to Bury, examines the implications of Covid and sets out the likely resource implications. It then describes when and how consultation on the Publication Pfe 2021 will take place.

The text of the GMSF 2020 has been revised following the withdrawal of Stockport. The impact of these revisions and whether these would have substantially the same effect on the remaining nine districts and whether to recommend the Pfe 2021 for district approval will be considered by the newly established Joint Committee of the nine participating districts on 20 July 2021. As such, the recommendations in this report are contingent on the decision of the Joint Committee.

Assuming that Cabinet approves Pfe 2021 for consultation purposes, approval will also be sought from Full Council on 28 July 2021 to subsequently submit the plan, its supporting evidence and representations received in response to consultation to the Secretary of State for Examination.

Recommendation(s)

Subject to the Joint Committee agreeing that the plan has substantially the same effect and recommending the plan to the districts, it is recommended that Cabinet:

1. Approves the Places for Everyone: Publication Draft 2021, including strategic site allocations and Green Belt boundary amendments, and reference to the potential use of compulsory purchase powers to assist with site assembly, and the supporting background documents, for publication pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for an 8-week period for representations to begin not earlier than 9 August 2021; and

2. Delegate to the Director of Economic Regeneration & Capital Growth authority to approve the relevant Statement of Common Ground(s) required pursuant to the National Planning Policy Framework 2019.

1 BURY'S DEVELOPMENT PLAN

- 1.1 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 Local Plan in place over that time (2011 and 2014) but these met with significant challenge as to whether these plans met Bury's housing needs.
- 1.2 In the latter case, the prospect of a joint development plan for Greater Manchester was beginning to emerge and the Inspector undertaking the examination of the Local Plan in 2014 concluded that '*...given the potential significance of the GMSF to Bury, I can see sense, in the current situation, of awaiting its outcome before producing a plan*' and that '*...it was likely to be most appropriate for the Council to consider withdrawing the submitted Core Strategy*'.
Strategy'.
- 1.3 The Council chose to pursue the approach recommended by the Inspector and focus efforts on the preparation of the GMSF before making significant progress on a Local Plan.

2 'PLACES FOR EVERYONE' JOINT PLAN – BACKGROUND

- 2.1 The "Future of GM" paper in 2019 set out Greater Manchester's bold plans for the future in the face of uncertainty. Despite Covid-19 and the ongoing uncertainty about the UK's future trading relationships, the bold and ambitious vision for the city-region remains unchanged, although the actions prioritised to achieve some of those ambitions will inevitably have to change. Greater Manchester's ambition to continue to be - and further develop our position as - a global city-region, with strong and prosperous communities throughout as well as a thriving and productive economy remains. Without a clear, long term cohesive set of plans it becomes almost impossible to implement and deliver initiatives that will achieve this ambition.
- 2.2 Within this context, the need for a bold spatial plan to provide certainty and guide development, investment and infrastructure has never been stronger. Government has sent a very strong message that Covid-19 should not be a reason to delay either the preparation of statutory plans or the determination of planning applications through the publication of emergency guidance to enable local authorities to continue to exercise their planning functions in a Covid-19 compliant way.

- 2.3 Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared, Greater Manchester's Plan for Jobs, Homes & the Environment (known as the 'GMSF'). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process. However, the decision at Stockport Council's meeting on 3 December to not submit the GMSF 2020 to the Secretary of State for independent examination following the consultation period, and the subsequent resolution at its Cabinet meeting on 4 December not to publish the GMSF 2020 for consultation, in effect signalled the end of the GMSF as a joint plan of the ten.
- 2.4 S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has "substantially the same effect" on the remaining authorities as the original joint plan.
- 2.5 Consequently, at its meeting on the 11 December 2020, members of the AGMA Executive Committee asked officers to report back on the implications and process of producing a joint DPD of the nine remaining Greater Manchester (GM) districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). One of the key issues that officers were asked to explore was the extent to which the joint Places for Everyone plan could take advantage of the provisions set out in paragraph 1.4 above and proceed to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Publication stage rather than have to go back to an earlier (Regulation 18) informal stage of consultation.
- 2.6 At the AGMA Executive Board meeting on 12 February 2021, a report was considered setting out the merits of continuing to produce a joint plan of the nine remaining GM districts, to be known as 'Places for Everyone' (PFE).
- 2.7 The report highlighted that producing such a plan would enable those nine districts to continue to:
- progress the strategic policies in GMSF 2020, for example net zero carbon development, affordable housing and space and accessibility standards for new housing;
 - maximise the use of sustainable urban/brownfield land and limit the need for Green Belt to accommodate the development needs of the nine;
 - align with wider Greater Manchester strategies for transport and other infrastructure investment;
 - utilise the evidence base already commissioned and completed, minimising the cost of producing further evidence; and

- spread the cost jointly of the independent examination.
- 2.8 At the meeting, it was noted that each district would be asked to approve the making of an agreement with each other to prepare a joint Development Plan Document. Subsequently, each of the nine districts have approved the establishment of a new Places for Everyone Joint Committee and delegated the formulation and preparation of a joint Development Plan Document to the Joint Committee.
- 2.9 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' PFE 2021 is an Executive decision for the participating local authorities.
- 2.10 Submission of PFE, pursuant to Reg. 22 of the Local Planning Regulations, also requires the approval of each of the participating Full Councils. Assuming that Cabinet approves PFE 2021 for consultation, approval will also be sought from Bury's Full Council on 28 July 2021 to subsequently submit the plan, its supporting evidence and representations received in response to consultation on PFE 2021 to the Secretary of State for Examination. Upon completion of the consultation on the Publication Plan in late 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022.
- 2.11 The text of the GMSF 2020 has been revised following the withdrawal of Stockport. The revisions to PFE 2021 (compared to GMSF 2020) fall into 5 broad categories:
- As a direct result of the withdrawal of Stockport Council from GMSF;
 - As a direct result of changes to government policy since October 2020;
 - As a direct result of new evidence/information being made available since October 2020;
 - Clarification of policy wording; and
 - Minor typographical changes.
- 2.12 The impact of these revisions and whether these would have substantially the same effect on the remaining nine districts and whether to recommend the PFE 2021 for district approval will be considered by the newly established Places for Everyone Joint Committee of the nine participating districts on 20 July 2021. As such, the impact of the revisions is not an issue to be considered in this report.

- 2.13 Nevertheless, for information, a review of the revisions to PfE 2021 (compared to GMSF 2020) is set out in more detail in Appendix 1. Leading Counsel has also confirmed that the relevant statutory provisions have been followed and endorsing the approach and conclusions that the plan has substantially the same effect and this opinion is set out in Appendix 2.

3 'PLACES FOR EVERYONE' JOINT PLAN – STRATEGIC OVERVIEW

- 3.1 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.
- 3.2 PfE 2021 provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes, protect, and enhance the natural environment. The full PfE 2021 document is available via the Combined Authority's web site at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>.
- 3.3 The Plan is not being prepared in isolation. It is supported by the Transport 2040 Delivery Plan, which will outline the interventions required to achieve the transport vision for the city region and is one of a suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside the Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital and Cultural Strategies. Each of these plans is part of a coherent set of measures that will seek to meet our overall objectives.
- 3.4 PfE 2021 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 PfE'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 PfE process. However, the PfE will need to advance ahead of the Local Plan to provide the strategic basis for local planning policies.
- 3.5 PfE 2021 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 plan. Appendix 3 to this report sets out all supporting documents relating to plan-wide matters and to Bury's proposed site allocations. These supporting documents are also available on the Combined Authority's web site at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>.

- 3.6 This evidence includes 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 4.
- 3.7 For Bury, the policies and proposals set out in PfE 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 PfE can be found in Appendix 5. The Local Plan will then provide more detailed local policies, replacing the remaining UDP policies.

Places for Everyone Publication Plan 2021

- 3.8 PfE 2021 is our plan for sustainable growth in the nine boroughs. In particular, the plan:
- sets out how these boroughs should develop up to the year 2037;
 - identifies the amount of new development that will come forward in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused;
 - identifies the important environmental assets which will be protected and enhanced;
 - allocates sites for employment and housing required outside of the urban area;
 - supports the delivery of key infrastructure, such as transport and utilities; and
 - defines a new Green Belt boundary for the nine boroughs.
- 3.9 PfE 2021 includes a spatial strategy which seeks to deliver sustainable and inclusive growth through three key spatial 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 is proposed in this area and over 50% of overall housing supply is found here and in the wards immediately surrounding it;
 - **Boosting the competitiveness of the northern districts** – provision of significant new employment opportunities and supporting infrastructure and a commitment that collectively the northern districts meet their own local housing need; and

- **Sustaining the competitiveness of the southern districts** – supporting key economic drivers, for example 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.

- 3.10 PfE sets out the spatial interpretation of the overarching Greater Manchester Strategy. It is one of a number of inter-linked plans and strategies being produced at a sub-regional level to help Greater Manchester’s ambitions to be a world class city region. This includes the overarching Greater Manchester Strategy and the 2040 Transport Plan for the conurbation, which identifies the strategic transport interventions that will enable the plan to be delivered.
- 3.11 Locally, PfE will support and complement many of our own current and emerging key strategies, including the overarching Let’s Do It strategy, the Bury Housing Strategy and the draft Climate Strategy and Action Plan. It will provide a strong policy basis for ensuring that future developments provide the necessary physical, social and environmental infrastructure to meet the aspirations of these plans (e.g. setting environmental standards in new buildings and helping to ensure that the right mix of house types, sizes and tenures are provided in new housing developments).
- 3.12 One of the key aims of PfE is to help tackle health inequality across the plan area, including Bury. To do this, the plan includes requirements for new development to maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development; and to support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice.
- 3.13 It should be noted that central to the PfE is the delivery of brownfield land and regeneration of town centres. Locally, the Council is progressing plans on key brownfield sites and has secured funding to bring key sites forward in the short term. We are continuing to work with Homes England on bringing forward the East Lancashire Paper Mill site, which is a central feature of the Radcliffe Strategic Regeneration Framework. We are also progressing our vision for our other key centres including Bury, Prestwich and Ramsbottom, which will ensure that we make these areas successful and attractive for both residential development and other investment.

4 PLAN FOR HOMES

- 4.1 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.

- 4.2 Greater Manchester is facing a housing crisis and the impact of Covid-19, with potential increases in unemployment will exacerbate this. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To seek to address issues around the supply of new homes, the Government has introduced a standard methodology for calculating local housing needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. 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.
- 4.3 Applying the current methodology means that around 10,300 (10,305) homes are required in per annum, equating to just under 165,000 (164,880) new homes over the plan period. The plan supports Greater Manchester's commitment to deliver more affordable housing - 50,000 units over the plan period, including 30,000 for social or affordable rent.
- 4.4 Like Bury, Stockport was a net beneficiary of the GMSF joint plan in that it was able to offset some of its housing targets elsewhere within the conurbation.
- 4.5 Initially, it was considered that Stockport's withdrawal from the joint plan could have meant that there would be further opportunities to reduce targets in the other districts and, therefore, a potential to reduce the amount of Green Belt that was required to be released (circa 5,000 units less on Green Belt land).
- 4.6 However, the opportunity to do this was effectively removed with the changes that were made to the Government methodology for calculating LHN (introduced in December 2020). These changes included a requirement for Manchester City Council to accommodate a 35% uplift over its previous housing target (increased their housing target by over 14,000). This meant that the increased targets in Manchester no longer mean that it could absorb some of the housing targets from elsewhere in the conurbation. Consequently, there is no opportunity for other areas to reduce their targets as a result of Stockport's withdrawal.

Plan for Homes – Bury

- 4.7 For Bury, the Government's current methodology gives a Local Housing Need (LHN) target of 9,456 homes over the plan period (591 homes per year). This is the baseline starting point for a plan to consider.
- 4.8 The PfE process allows for a redistribution of Bury's LHN within the conurbation to reflect the availability of land or to reflect strategic policies. As

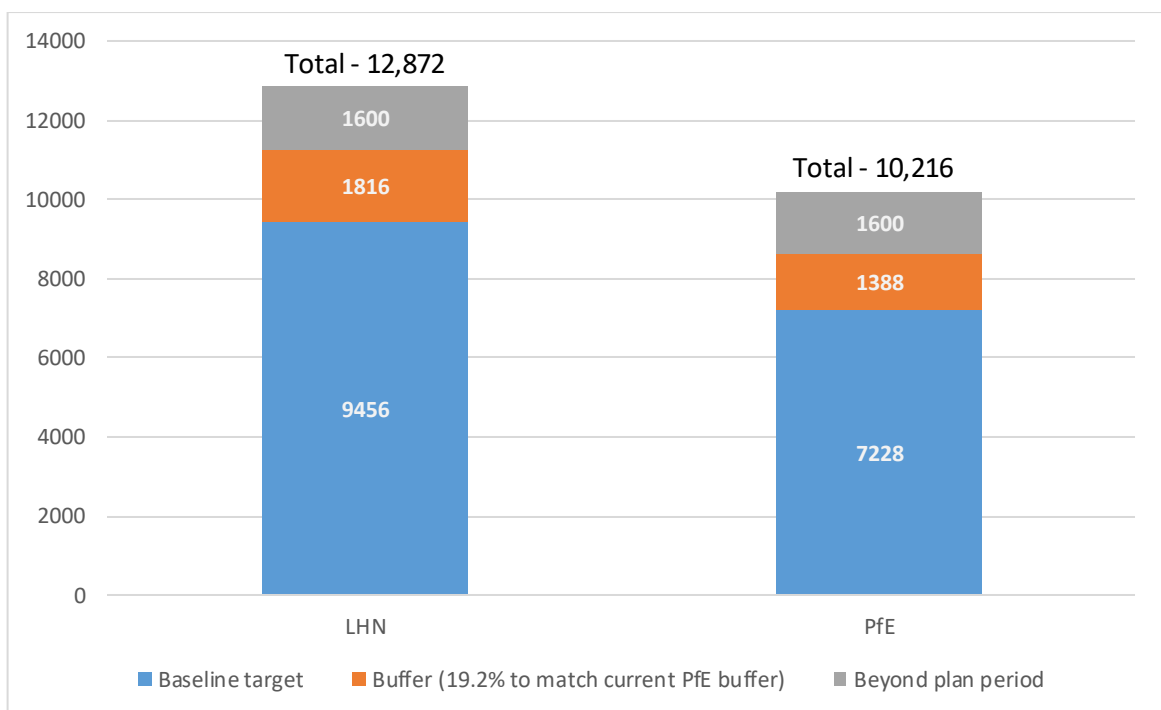
a result, Bury has been able to reduce the baseline housing target over the plan period to 7,228 homes (average of 452 homes per year).

- 4.9 This represents a reduction of 2,228 units on the Government’s minimum LHN for the Borough meaning that the target through PfE 2021 is only 76% of the LHN.
- 4.10 Furthermore, Bury’s proposed housing target in PfE 2021 represents just 4.4% of the total housing target across the PfE plan area, which is the lowest of the nine districts participating in the Joint Plan.
- 4.11 However, as a Borough, we do not have enough land within the urban area or on brownfield sites to meet even this reduced PfE 2021 target. Bury’s housing land supply assessment identifies that there is only enough land to accommodate 3,776 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.
- 4.12 This supply shortfall means that the following Green Belt sites are proposed to be released through PfE 2021 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

- 4.13 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 8,616 units. This provides a 19% 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 16% buffer against the cumulative target for the PfE plan area. The buffer is not a sign that excess land has been identified but is, in fact, necessary to demonstrate that the targets can be met, particularly in light of the viability challenges to some of GM’s brownfield land supply.

- 4.14 It should be noted that the PfE 2021 proposal to reduce Bury’s housing target means that the numerical impact of a buffer has also been reduced (i.e. a 19% buffer on top on Bury’s full LHN would equate to 1,816 units, whereas the 19% buffer on the reduced housing target of 7,228 equates to only 1,388 units – a difference of 428 units).
- 4.15 PfE 2021 proposals include the release of Green Belt land beyond the plan period for residential development at the Elton Reservoir site (which has been the case in the previous two iterations of the plan). 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.
- 4.16 The total difference between a plan that meets Bury’s full Local Housing Need targets with a buffer and the reduced housing targets in the PfE 2021 with a buffer, is illustrated in the diagram below. This shows that by participating in the PfE joint plan, Bury is able to offset some of its targets elsewhere, and when also combined with a reduced buffer, the net reduction is 2,656 units.



- 4.17 Importantly, the reduction in Bury’s housing target in the PfE 2021 compared to the LHN target, means that the Borough is able reduce the amount of Green Belt that is needed to meet housing needs (i.e. the plan allows for a significant amount of the Borough’s LHN to be met elsewhere).

Strategic Sites

- 4.18 Not only does PfE 2021 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 PfE 2021 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.
- 4.19 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

- 4.20 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 PfE 2021 strikes the right balance in providing new homes and infrastructure, whilst reducing the amount of Green Belt released.
- 4.21 The housing sites proposed through PfE 2021 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.
- 4.22 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 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 PfE 2021 will deliver over 1,200 affordable homes in Bury during the plan period (25% of the total homes proposed on sites allocated through PfE 2021).
- 4.23 New housing will also include provision for special needs housing, such as specialist housing and accommodation for the elderly.

5 PLAN FOR JOBS

- 5.1 Economic prosperity is central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities. In the face of the uncertainty wrought by Covid-19, we know that we need to continue to invest

in our city and town centres to drive our recovery. We need to continue to develop our Research and Development capabilities underpinned by our excellent academic institutions as well as investing in strengthening existing, and creating new, employment locations so that all communities are able to contribute to, and benefit from, growth.

- 5.2 The Greater Manchester Independent Prosperity Review: One Year on 2020 indicated that Greater Manchester was the most economically diverse city region economy with world-class strengths in advanced materials and health innovation. Yet the Prosperity Review also acknowledged that for two decades Greater Manchester's productivity consistently remained at 90% of UK level and a year on this gap persists.
- 5.3 There is a growing body of evidence that the worst effects of the Covid-19 pandemic have amplified pre-existing patterns of not only health, but also economic inequality. This gap is linked to economic inequality with overall pay levels and salary growth in Greater Manchester lagging behind UK averages. The growth in employment in low productivity sectors witnessed in Greater Manchester over the last decade further explains this, as these sectors are likely to pay lower wages and invest in lower value business models which perpetuate the challenges. Furthermore, it is in these sectors of the foundational economy (retail, hospitality and leisure) in which employees have tended to be hardest hit during the Covid-19 crisis.
- 5.4 Growing inequalities have a major impact on quality of life for Greater Manchester residents such as the ability to afford decent housing, good quality food and services. As emergency support schemes from government are withdrawn, a greater focus is needed to support businesses in the foundational economy in a Greater Manchester has the opportunity to lead with the 'levelling up' agenda helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole. This Plan 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 even 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; invest in skills and business development to support the foundational economy, and promote the continued progress towards a low-carbon economy.
- 5.5 In pursuit of this, the plan sets a target of at least 1,900,000 sq.m. of new office floorspace and at least 3,330,000 sq.m. of industrial and warehousing floorspace across Greater Manchester over the plan period.

Plan for Jobs – Bury

- 5.6 Over recent years, the northern areas of Greater Manchester, including Bury, have seen relatively low overall levels of economic growth 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.
- 5.7 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 PfE 2021 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.
- 5.8 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 within the PfE plan area reflecting the fact that the majority of office development will take place in the inner core areas of Manchester and Salford.
- 5.9 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 local issue around the severe lack of land for industrial and warehousing development in Bury.
- 5.10 At present, the Borough has by far the lowest existing baseline supply of land for industrial and warehousing of any participating district with a supply that is capable of accommodating only 10,231 sq.m, of floorspace - equating to only 0.5% of the total existing supply across the nine districts. 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.
- 5.11 PfE 2021 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.
- 5.12 Of this 1.2 million sq.m, around 491,000 sq.m. is expected to come forward in Bury within the plan period with potential for further floorspace beyond the

plan period (based on illustrative masterplans which may be subject to change). Together with the existing supply of 10,231 sq.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.

- 5.13 The total proposed supply of 501,231 sq.m. would significantly increase Bury's contribution to 12.3% of total supply of industrial and warehousing floorspace within the plan period across the nine participating districts.
- 5.14 The employment proposals at the Northern Gateway represent the largest proposed release of land in Bury under PfE 2021, accounting for 310 hectares of the total 519 hectare net Green Belt loss in Bury.

6 PLAN FOR THE ENVIRONMENT

- 6.1 The Plan is not solely concerned with accommodating development. It also includes a range of policies designed to protect and enhance our 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.
- 6.2 The Plan supports the important role of our natural assets by:
- Taking a landscape scale approach to nature restoration;
 - Seeking to protect and enhance our 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 the plan period.
- 6.3 Furthermore, the plan 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

- 6.4 PfE 2021'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.

6.5 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 (see Appendix 5).

7 PLAN FOR INFRASTRUCTURE

- 7.1 PfE 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.
- 7.2 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.
- 7.3 The quality, distribution and resilience of infrastructure will be important in ensuring that PfE is successfully implemented and delivered. Infrastructure is essential to support the delivery of PfE's vision and objectives.
- 7.4 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.
- 7.5 As mentioned, PfE is one of a suite of complementary documents designed to support long-term aspirations in 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.

- 7.6 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.
- 7.7 Importantly, the Transport for Greater Manchester (TfGM) 2040 and its Transport Delivery Plan seek to deliver some of the key highway and public transport infrastructure interventions associated with some of the PfE 2021 proposals and other developments.

Plan for infrastructure - Bury

- 7.8 PfE 2021 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 educational facilities to specifically support development proposals for Walshaw, the Elton Reservoir area (including the provision of a new high school for Radcliffe) 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.

7.9 These infrastructure requirements will be embedded within PfE’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.

8 PLAN FOR GREEN BELT

8.1 PfE 2021 proposes a limited release of a Green Belt for both housing and employment. The net loss of Green Belt proposed across the nine participating districts is 1,754 hectares. This represents a significant reduction from the 4,371 hectares which were proposed for release in the 2016 GMSF. This has been achieved through:

- Removing a number of sites;
- Reducing the extent of Green Belt release within sites and retaining more Green Belt within some sites; and
- Proposing a limited number of Green Belt additions.

8.2 The proposals in the Plan would result in the overall extent of the nine PfE districts Green Belt reducing by 3.3%. The current Green Belt covers almost 47% of the land covered by the nine PfE districts the proposals in this Plan would reduce this by just under 2% with 45.2% of the PfE Plan area remaining as designated Green Belt.

Plan for Green Belt – Bury

8.3 The sites in Bury that have been proposed for employment and housing development in PfE 2021 have evolved as the plan 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.

- 8.4 The changes have resulted in a significant reduction in the proposed net loss of Green Belt in the PfE 2021 compared to what was originally proposed in the first draft of the GMSF in 2016 and what was subsequently proposed in the revised draft GMSF in 2019.
- 8.5 The original 2016 draft GMSF proposed the release of 1,211 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 of the GMSF involved a reduced net loss of 714 hectares (12%) of the Green Belt.
- 8.6 Further revisions have been made to the sites proposed in PfE 2021 (i.e. reflecting the proposals in the GMSF 2020). In particular, the site at Whitefield has now been removed entirely, there has been a significant reduction in the extent of the site at Simister/Bowlee which retains Simister Village within the Green Belt and there has been a minor amendment to remove a small area of land from the proposed allocation at Walshaw. These additional amendments mean that PfE 2021 is now proposing a net loss of 519 hectares (8.8%) of the Borough's Green Belt.
- 8.7 As stated previously, 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 519 hectares net loss.
- 8.8 Bury's Green Belt currently covers 5,927 hectares of the total land area of the Borough (i.e. 59.5%). The proposals in PfE 2021 to reduce this by 519 hectares would mean that 5,408 hectares would remain as Green Belt. This would mean that 54.3% of the Borough would remain Green Belt land.
- 8.9 Without an up-to-date plan in place, we would be at serious risk of getting inundated by speculative planning applications on Green Belt sites across the Borough. This may lead to a situation where we are 'planning by appeal' i.e. where applicants will appeal against any refusal of planning permission and effectively have their proposals considered by a Planning Inspector.
- 8.10 This could potentially lead to a greater loss of Green Belt because these appeals would be more likely to be allowed by the Planning Inspectorate in the absence of a plan that showed that housing needs could be met elsewhere within the Borough. There are examples elsewhere in the country where the lack of housing supply has resulted in appeals being allowed on Green Belt land. One recent example involved an appeal by Canton Ltd against the decisions of St. Albans City and District Council and Welwyn Hatfield Borough

Council to refuse planning permission for 100 dwellings on Green Belt land at Roundhouse Farm in Colney Heath. In this case, the Inspector allowed the appeal and whilst recognising that the proposals would cause harm to the Green Belt by reason of inappropriateness and harm to openness, it was concluded that this was outweighed by an acute housing delivery shortage and affordable housing need. See [Reference: APP/B1930/W/20/3265925 \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/app/b1930/w/20/3265925) for the appeal decision.

9 BROWNFIELD LAND PREFERENCE

9.1 There is a strong focus in PfE 2021 on directing new development towards sites within the existing urban area, which are often in sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in the urban area reduces the need to release greenfield and Green Belt land for development.

9.2 The land supply identified for development in the plan is largely within the urban area:

Land supply type	% within the existing urban area
Offices	99%
Industry and Warehousing	47%
Housing	90%

9.3 There are significant viability issues in parts of the conurbation and there is a need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The recently announced Brownfield Housing Fund is targeted at Combined Authorities and begins to help to address viability issues but it is not enough to enable the full potential of our brownfield land supply to be realised.

10 SITE SELECTION

10.1 In November 2015, a 'Call for Sites' exercise was launched in conjunction with the GMSF whereby local residents, businesses, landowners and developers were invited to identify sites that they thought could be suitable for housing or employment development.

- 10.2 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.
- 10.3 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 on the GMSF, 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.
- 10.4 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.
- 10.5 In Bury, PfE 2021 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.
- 10.6 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, PfE 2021 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.
- 10.7 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.

11 RELATIONSHIP WITH DISTRICT LOCAL PLANS

- 11.1 PfE is key to creating the foundations for the scale of growth and ambition across the participating districts and Greater Manchester as a whole. It will be part of the Development Plan for each participating local authority, but it is a high level, strategic plan and does not cover everything that a district local plan would. Appendix 5 sets out the policies in the Bury Unitary Development Plan that will be replaced by policies in PfE.
- 11.2 Local plans will continue to be important to take forward PfE's strategic policies and interpret these at a more detailed local level to support the creation of locally distinctive high quality places/neighbourhoods. Following adoption of the PfE, each district will be updating their own local plans.

12 INTEGRATED ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT

- 12.1 As part of the development of the GMSF 2020, an Integrated Assessment (IA) was undertaken incorporating the requirements of:
- Sustainability Appraisal (SA): mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
 - Strategic Environmental Assessment (SEA): mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
 - Equality Impact Assessment (EqIA): required to be undertaken for plans, policies and strategies by the Equality Act 2010.
 - Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 12.2 The IA contributed to the development of the GMSF through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.
- 12.3 Given the conclusion that PfE 2021 has substantially the same effect as the GMSF 2020 would have had on the nine districts enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations, it follows that PfE 2021 should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport).
- 12.4 Therefore “the plan” which is being assessed is one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. In view of this, the environmental assessments carried out at previous stages remain valid (including their scope). That said, addendum reports have been prepared to assess the impact of the changes between GMSF 2020 and PfE 2021 against the IA framework and these are available alongside the GMSF 2020 IA documentation.
- 12.5 A Habitats Regulations Assessment (HRA) refers to several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
- 12.6 All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have

significant effects on that site. If a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an Appropriate Assessment of the implications for the site is required.

- 12.7 As was the case with GMSF, PfE 2021 is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and has therefore been informed by an HRA with mitigation measures identified as appropriate.

13 EVIDENCE BASE

- 13.1 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. This evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. This evidence base has been reviewed and updated in the light of the change to the PfE 2021 and, where appropriate addendum reports have been produced. The evidence documents which have informed the plan are available on the website, in advance of the formal consultation starting.
- 13.2 One key supporting document is the Statement of Common Ground. This will set out the key matters between the nine authorities agreeing on the distribution and quantum of development contained in the Publication Plan. It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the 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.
- 13.3 It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. The position between Stockport and the remaining nine Greater Manchester authorities has evolved from December 2020 when all ten were co-operating on the Greater Manchester Spatial Framework, to the more recent position where, in March 2021, the nine remaining local authorities agreed to produce a joint plan (Places for Everyone) following the Stockport decision to withdraw from the joint plan to prepare its own local plan.
- 13.4 In the light of this it has been necessary to 'reset' the Duty to Co-operate arrangements. The outcome of the GMSF work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations to ensure that the overall Vision and Objectives of the Plan were met. Whilst the outcome of the spatial strategy was some individual districts not meeting their LHN and some exceeding theirs, the extent to which districts were meeting need was never a defining factor in determining distribution. No district was identified as having 'unmet' needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial

strategy. At this point in time, the 9 districts do not have an understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport's assessment of it and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs. Duty to cooperate discussions with Stockport continue

- 13.5 The PfE 2021 and supporting documents can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>).
- 13.6 This website will be updated following the district approval process and the consultation portal (GMConsult.org) will become live at the start of the formal consultation.

14 IMPLICATIONS OF COVID-19

- 14.1 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.
- 14.2 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.
- 14.3 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>).
- 14.4 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.
- 14.5 The PfE Joint Plan 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.
- 14.6 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 temporary arrangements are in place until 31 December 2021.
- 14.7 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.

- 14.8 Nevertheless, the prime minister's recently announced plan for "living with Covid" will be fully considered in informing how we can best undertake consultation in an effective and safe manner.

15 CONSULTATION ON THE PUBLICATION GMSF

- 15.1 Following consultation on two previous drafts of the GMSF in 2016 and 2019 and the subsequent withdrawal of Stockport from the process in 2020, it is now proposed to progress with the Publication of the PfE 2021 Joint Plan which is effectively the final draft of the plan and that which each of the nine participating districts consider should be the final plan to be submitted to Government.
- 15.2 It is now proposed that PfE 2021 Plan should be subject to a further eight-week period of public consultation commencing not earlier than 9 August 2021.
- 15.3 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.
- 15.4 At this stage, whilst anyone can make a representation on any point, only those pertaining to 'soundness' will be taken into account by the Inspector(s). The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. As set out in paragraph 35 of the National Planning Policy Framework, plans are sound if they are:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 19; 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;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **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

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

15.5 Inspectors also consider submissions concerning legal compliance issues, for example the Integrated Assessment, the Habitats Assessment Regulation and the Duty to Co-operate.

15.6 Consultation will be carried out in line with the requirements of the Statement of Community Involvement.

15.7 Effective community and stakeholder engagement will be promoted by means which are reasonably practicable. Government guidance strongly encourages the use of online engagement methods and the use of the following methods will be considered as a way of undertaking effective engagement:

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

15.8 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).

15.9 Given the uncertainty around the circumstances with Covid at the time of consultation, different methods will be developed to respond to situation and the level of public interaction which may be possible at that time, with the priority being the maintenance of public safety.

What happens following consultation?

15.10 Following consultation on PFE 2021, the plan 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 PfE 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities. Whilst anyone can make a representation on any point, only those pertaining to the 4 tests of soundness will be taken into account by the Inspector(s). If major new issues arise at the Publication Consultation stage there would need to be further consultation prior to any submission of the plan.

- 15.11 An Examination in Public takes place at which a Planning Inspector(s) will consider the PfE Joint Plan and representations made in respect of it and determine whether it is capable of being adopted, either with or without modifications.
- 15.12 Throughout the Examination, the Inspector(s) will explore the potential for main modifications to resolve the soundness and legal compliance issues he or she has identified. Section 20(7C) of the Planning and Compulsory Purchase Act requires the Inspector to recommend main modifications if asked to do so by the Local Planning Authority, provided that the modifications are necessary to make the plan sound and legally compliant.
- 15.13 Assuming that the document is capable of adoption, whether with or without modifications, the ultimate decision to adopt must be taken by each of the Full Councils of the nine participating local authorities.

16 RESOURCES

- 16.1 The examination of the PfE Joint Plan will be the largest and most complex examination into a development plan to date in England and, given the public interest in the plan, it is likely that representations received will number in the thousands. Consequently, it is estimated that the examination of the PfE Joint Plan could run for between 6-12 months.
- 16.2 This will have financial implications to cover the costs of the Planning Inspector(s), Programme Officer(s), legal representation, venue hire and the need for districts to input legal and planning staff resources.

17 SUMMARY

- 17.1 It is considered that working with the other eight participating districts on PfE 2021 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. PfE 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.

Without an up-to-date plan in place, we would also be at serious risk of getting inundated by speculative planning applications on Green Belt sites across the Borough. This may lead to a situation where we are 'planning by appeal' i.e. where applicants will appeal against any refusal of planning permission and effectively have their proposals considered by a Planning Inspector which could potentially lead to a greater loss of Green Belt because these appeals would be more likely to be allowed by the Planning Inspectorate in the absence of a plan that showed that housing needs could be met elsewhere within the Borough e.g. the case at Roundhouse Farm referred to earlier in paragraph 8.10 of this report.

- **A stronger local economy** – One of the key aims of PfE 2021 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, PfE 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 PfE by the nine participating 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 2,656 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.

17.2 It is important to recognise that if the PfE Joint Plan 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 PfE process and to only produce a Local Plan – the implications of this option are set out in the report.

Community impact

PfE 2021 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 PfE 2021 is to make provision for the homes and jobs needed across the plan area, 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 'Places for Everyone' Joint Plan and the outcomes of this analysis can be seen at Appendix 6.	

**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. However, 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.

Consultation:

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

Legal Implications:

The Places for Everyone Joint Plan will form part of the statutory development plan for each of the nine participating 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 Places for Everyone Joint Plan, 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 PfE Joint Plan. The formal submission of PfE 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 PfE 2021 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 plan and all representations received are then sent to the Secretary of State. It is a Council decision to submit the PfE Joint Plan following consultation a report to Council will follow.

Financial Implications:

The preparation and examination of the Places for Everyone Publication Plan 2021 generates a revenue cost for the nine participating local authorities. A substantial evidence base has been assembled to support the plan which has involved commissioning of specialist and independent experts. There are no current revenue implications. Following this consultation, the PfE plan will be submitted to the Secretary of State for examination. There will be further revenue costs associated with the examination process, including appointment of a Programme Officer(s) and the cost of the examination itself, including procurement of a venue, Planning Inspectors and legal advice. Further reports will be provided to the Joint Committee as appropriate.

Report Author and Contact Details:

Crispian Logue – Assistant Director of Strategy, Planning and Regulation

Email: c.logue@bury.gov.uk

Background papers:

- Places for Everyone: Publication Draft 2021.
- Key supporting evidence.

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

Term	Meaning
Places for Everyone Joint Plan (PfE)	PfE is a statutory Development Plan Document that provides the strategic basis for planning future growth and development in nine of the Greater Manchester districts 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.

List of Appendices:

- Appendix 1 – Revisions to text of the GMSF2020 following the withdrawal of Stockport
- Appendix 2 – Counsel Opinion on changes between GMSF 2020 and PfE 2021
- Appendix 3 – Places for Everyone: Plan-wide and site-specific supporting documents
- Appendix 4 – Topic Papers for each of the proposed PfE 2021 site allocations in Bury
- Appendix 5 – Treatment of existing Unitary Development Plan Policies on adoption of PfE
- Appendix 6 – Equality Impact Assessment