

Classification:

Open

Decision Type:

Key

Report to:	Cabinet and Overview and Scrutiny Committee	Date: 05 October 2023 and 04 th October 2023
Subject:	Places for Everyone: A Joint Development Plan Document for 9 Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) - Proposed Modifications Consultation.	
Report of	Leader and Cabinet Member for Strategic Growth	

1. Summary

- 1.1 This report updates Members on the progress of Places for Everyone Plan: A Joint Development Plan Document for nine Greater Manchester Local Authorities (PfE) and seeks approval to consult on proposed modifications to the Plan.

2. Recommendation(s)

- 2.1 That Members:
- i. Note progress made in respect of the Places for Everyone Joint Development Plan;
 - ii. Agree that the modifications to Places for Everyone (Main, Additional and those relating to the policies map), and associated supporting background documents be subject to a period of representations for a period of 8 weeks commencing no earlier than 9 October 2023; and
 - iii. Agree the next steps for the production of Places for Everyone (section 15).

3. Reasons for recommendation(s)

- 3.1 To ensure continued progress towards the adoption of the Places for Everyone Joint Development Plan as a key part of Bury's statutory development plan.

4. Alternative options considered and rejected

- 4.1 To not approve the proposed modifications and to withdraw from Places for Everyone.

- 4.2 However, this option is rejected on the basis that the Council would be unable to benefit from this opportunity to meet its statutory requirement to have an up-to-date development plan in place in the short-term. This would leave the Borough open to speculative and unplanned development with insufficient supporting infrastructure.
- 4.3 Furthermore, as a joint plan of nine Greater Manchester districts, Places for Everyone has allowed for the redistribution of housing needs across the Plan area. As a result, Bury's housing target in the Plan is over 2,300 (24%) less than what would be required outside of the joint plan process using the Government's standard methodology. Therefore, withdrawing from Places for Everyone to pursue an alternative plan could result in Bury requiring a higher housing target and lead to the need for more Green Belt release.

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5. Background

- 5.1 Members will be aware that there is a statutory requirement for local authorities to have an up-to-date development plan in place that identifies sufficient land to accommodate new homes and jobs for a growing population.
- 5.2 Places for Everyone is a joint development plan for sustainable growth in the nine participating Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) and will, once adopted, form a key part of Bury's wider statutory development plan.
- 5.3 Up until December 2020 a joint development plan of the ten Greater Manchester local authorities was being prepared – referred to as the Greater Manchester Spatial Framework (GMSF). The GMSF had reached the Regulation 19 (Publication) stage of the process. However, decisions taken by Stockport Council in December 2020 signalled the end of the joint plan of the ten but the remaining nine GM authorities made the decision to progress with a joint plan and this became known as 'Places for Everyone' (PfE).
- 5.4 At its meeting on the 20 July 2021, members of the Places for Everyone Joint Committee recommended the Plan (and its supporting background

documents) to the nine authorities for 'Publication', pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for an 8-week period of consultation. The 'Publication' stage is a statutory stage where formal consultation on the draft plan provides an opportunity for organisations and individuals to submit their views on its content.

- 5.5 On 21 July 2021, the 'Publication' Places for Everyone was subsequently approved by Bury's Cabinet and consultation on this plan ran over an 8-week period from 9 August 2021 to 3 October 2021. In response to this consultation, over 15,000 representations were received by over 3,800 individuals and organisations.
- 5.6 All duly made representations, together with the Regulation 19 Places for Everyone plan, supporting background documents and a number of reports (including details of the consultation that took place, summaries of the main issues raised and the nine authorities' responses to those issues) were submitted to the Secretary of State on 14 February 2022, pursuant to Regulation 22 of the Local Planning Regulations. This is called the 'Submission' stage and marked the beginning of the independent examination of the Plan.

6. The examination of the Plan

- 6.1 The examination is the final stage in the plan-making process before potential adoption. The legislative requirements for the examination are contained in the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Some guidance on procedure is also provided in the National Planning Practice Guidance chapter on plan-making. However, many of the detailed procedural aspects of the examination are not prescribed in legislation, allowing Inspectors a degree of flexibility in conducting an examination. This enables Inspectors to adapt the procedures to deal with situations as they arise and to achieve positive outcomes in a range of different circumstances.
- 6.2 Following submission of a plan, the Inspector takes control of the examination process from start to finish. The Inspector's role is to examine whether the submitted plan meets the tests of soundness defined in the National Planning Policy Framework (NPPF)¹ and meets all the relevant legislative requirements, including the duty to co-operate². The examination of Places for

¹ The tests of soundness in paragraph 35 of the NPPF require that the plan is positively prepared, justified, effective and consistent with national policy.

² Paragraph 24 of the NPPF requires that local planning authorities cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

Everyone therefore concentrated on the issues that affect the Plan's soundness and legal compliance.

- 6.3 Given the scale of the examination, three Inspectors were appointed by the Planning Inspectorate (PINS) to hold an independent examination of the Plan: William Fieldhouse, Louise Gibbons and Steven Lee. All three are very experienced planning inspectors and conducted the examination in a very thorough and professional way throughout.
- 6.4 The examination of Places for Everyone officially commenced at the point of 'submission' in February 2022 and will remain on-going until the Inspectors issue their final report (i.e. it includes the period before and after the hearing sessions).

Initial assessment of the Plan

- 6.5 In the early stages of the examination, the Inspectors undertook an initial assessment of the Plan which gave rise to a series of Preliminary Questions for the Places for Everyone authorities to respond to. The Preliminary Questions were intended to provide the Inspectors with clarity on various issues and to narrow down the focus of the examination.
- 6.6 The Preliminary Questions were followed by a series of Matters, Issues, and Questions that were intended to help the Inspectors decide if the Plan is sound and, if not, how it could be modified to ensure that it is. The Places for Everyone authorities were required to submit written statements in response to all of the Matters, Issues and Questions and, in doing so, a number of modifications were proposed to address issues raised by the Inspectors. Other stakeholders that had responded to consultation at the Regulation 19 stage were also invited to submit written statements in response to the Matters, Issues and Questions.
- 6.7 The responses to the Inspectors' Preliminary Questions and Matters, Issues and Questions are available on the Examination website.

Hearing sessions

- 6.8 The Inspectors' initial assessment of the Plan was followed by a series of hearing sessions. The main purpose of the hearing sessions was for the Inspectors to probe the evidence further, by asking questions of the participants and hearing their oral contributions on the issues and questions that are critical to the soundness and legal compliance of the Plan. The Inspectors also used these sessions to encourage discussion on how any soundness or legal compliance issues with the Plan could be resolved.
- 6.9 The hearing sessions for the Plan commenced on 1 November 2022. They were held at the former Manchester Fire and Rescue Training and Development Centre in Manchester city centre and sat for a total of 12 weeks,

including a final session at the beginning of July 2023. All hearing sessions were livestreamed and remain available to view via the GMCA website.

- 6.10 In the lead up to Christmas 2022, the hearing sessions considered the Plan's Spatial Strategy and thematic policies and the sessions in 2023 focused on the strategic site allocations, Green Belt additions and monitoring of the Plan.
- 6.11 The additional session in July related to five specific proposed allocations (JPA1.1 Heywood/Pilsworth; JPA28 North of Irlam Station; JPA29 Port Salford Extension; JPA30 Ashton Moss; and JPA33 New Carrington) and had been arranged by the Inspectors to discuss issues around land that has been identified by Natural England as containing deep peaty soils.
- 6.12 The Places for Everyone authorities were represented by Christopher Katkowski KC throughout the hearings, with staff from the Greater Manchester Combined Authority, the nine local authorities, Transport for Greater Manchester and the Greater Manchester Ecology Unit providing expert witnesses.

7. Proposed modifications to the Plan

Main modifications

- 7.1 It is normal practice at examinations for Inspectors to recommend main modifications to a plan where these are considered necessary to make the plan sound and/or legally compliant.
- 7.2 As a matter of law, a 'main modification' can only be made if it is necessary to make the plan 'sound' (as defined by the tests in the NPPF). Therefore, legislation enables the Inspector to recommend a main modification only if the plan would otherwise be unsound or legally non-compliant. The Inspector has no power to recommend other changes, even if they would improve the plan.
- 7.3 Throughout the duration of the hearings, the Inspectors issued a series of 'Action Points' for the Places for Everyone authorities to respond to and these included modifications to policies on the basis that these were considered necessary at that stage of the examination to inform the Inspectors' consideration of whether the Plan is sound and/or how it could be made sound and/or legally compliant as a result of these modifications. The Inspectors made it clear when they published their Action Points that they may decide that other or different main modifications may be required. The responses to the Inspectors' Action Points are available on the Examination website.
- 7.4 As requested by the Inspectors, all the proposed main modifications were compiled into a schedule and this was updated at various times to add further modifications as the hearings progressed. The schedule was first published in July 2022 with subsequent editions being published in October and November

2022 and January, May and June and August 2023. Similarly, a number of composite versions of Places for Everyone were also published to show how the Plan was intended to be modified in a more user-friendly way.

- 7.5 The Inspectors agreed the text of the proposed main modifications with the Places for Everyone authorities based, in most cases, on discussion at the hearing sessions. This was done through the Action Points outlined above and it was the responses to these, the various iterations of the proposed main modifications schedules and composite plan which informed the Inspectors' consideration of whether the Plan is sound and/or how it could be made sound and/or legally compliant by main modifications.
- 7.6 The Inspectors' published their post-hearing letter on the examination web site on 11 August 2023 setting out the next steps in the examination. This stated that, having considered all proposed main modifications in the context of all of the written material in the examination library and everything that was heard at the hearing sessions, they are satisfied at this stage of the examination that all of the proposed main modifications are necessary to make the Plan sound and would be effective in that regard. This conclusion is, however, without prejudice to their final conclusions that they will reach following consideration of responses to the consultation on the main modifications.

Additional modifications

- 7.7 In addition to the main modifications, a separate schedule of additional modifications has been prepared. Additional modifications (sometimes referred to as 'minor modifications') fall outside of the scope of the examination. They are modifications that do not materially affect a plan's policies and are not required to make the plan sound but they may, for example, relate to factual updating, clarification and corrections to grammar and presentation.

Viewing the modifications

- 7.8 The proposed main and additional modifications are set out in respective schedules and these have also been highlighted within a composite version of Places for Everyone so that the modifications can be viewed within the context of the Plan itself. The schedules of main and additional modifications³ and the Composite Plan can be viewed at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/modifications/>

³ It should be noted that following publication of the Schedule of Main Modifications, a formatting error has been identified in MM7.2 (replacement Table 7.1) which omits the text from the final column of the table. However, the complete Table 7.1 is available to view in the Composite Plan.

8. What do the modifications mean for the overall aims of the Plan and for Bury?

- 8.1 Whilst there are a significant number of proposed modifications, they do not change the overall Vision, Objectives and Spatial Strategy of the Plan.

Plan period

- 8.2 The submitted Places for Everyone covered a plan period from 2021 to 2037. However, the Inspectors consider that a modification is required to extend this to cover the period 2022 to 2039. This will ensure that, in line with the National Planning Policy Framework⁴, the Places for Everyone's strategic policies look ahead over a minimum 15-year period from adoption and, as a result, provide an adequate policy framework for the more detailed district local plans, which will follow on from the adoption of Places for Everyone.

Spatial strategy

- 8.3 The spatial strategy remains to deliver sustainable, inclusive growth with the following 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 around 50% of overall housing supply is found here and in the wards immediately surrounding it (inner areas).
 - **Boosting northern competitiveness** – provision of significant new employment opportunities and supporting infrastructure, including JPA1.1 Northern Gateway (Heywood/Pilsworth), and a commitment that, collectively, the northern districts meet their own local housing need, including through JPA1.2 Simister/Bowlee; JPA7 Elton Reservoir, JPA8 Seedfield and JPA9 Walshaw.
 - **Sustaining southern competitiveness** – 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.

Jobs

- 8.4 Economic prosperity remains 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. Places for

⁴ Paragraph 22.

Everyone continues the approach of attracting investment in our city and town centres alongside recognising the importance of investing in strengthening existing and creating new employment locations, so that all communities are able to contribute to, and benefit from, growth.

- 8.5 To play a major role in contributing towards achieving GM's economic growth potential, Places for Everyone sets a global target for the nine authorities of just over 2 million sq.m. of new office floorspace and just over 3.5 million sq.m. of industrial and warehousing floorspace over the Plan period. These figures have been modified to reflect the revised Plan period and will inform the preparation of district local plans.
- 8.6 JPA1.1 Northern Gateway (Heywood Pilsworth) continues to be identified as a large, nationally significant location for new employment-led development within both Bury and Rochdale. The scale of the opportunity is genuinely transformational and will help to deliver a significant jobs boost to wider northern and eastern parts of the conurbation, increasing the economic output from this area and helping to rebalance the Greater Manchester economy. It will also address Bury's long-standing shortage of high-quality employment land which has undoubtedly held back the Borough's local economy and led to several growing Bury-based businesses relocating outside of the Borough due to a lack of opportunity for expansion.

Modifications to the Northern Gateway (Heywood/Pilsworth) allocation policy JPA1.1

- 8.7 Following discussions at the hearing session regarding the Northern Gateway (Heywood/Pilsworth) site, the Inspectors required several modifications to Policy JPA1.1. These include additional criteria relating to:
- A requirement to make provision for compensatory improvements to remaining Green Belt;
 - Strengthening the boundary of the Green Belt to the north of the site around Pilsworth Cottages, Brightly Brook and Pilsworth Fisheries;
 - Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas; and
 - The need to undertake investigations into the extent and quality of peat in the south-west of the site.
- 8.8 A modification is also proposed to include a criterion that signposts the reader to a new Appendix D (which sets out the indicative highways and transport interventions for the site) and refers to Policy JP-C7 which sets out transport requirements of new development. This is to replace specific references to the indicative interventions within the policy itself.

- 8.9 A number of other modifications are required to Policy JPA1.1 to ensure consistency in wording across all of the site allocation policies and to remove generic policy criteria that repeat requirements that are covered elsewhere in the Plan.
- 8.10 The proposed modifications are not considered to substantively change Policy JPA1.1 for the Northern Gateway (Heywood/Pilsworth) site.

Homes

- 8.11 Greater Manchester is facing a housing crisis. Although recent years have seen an increase in house building in Greater Manchester, wages have not been keeping pace with property price increases and affordability issues have intensified.
- 8.12 To ensure that there is an adequate supply of opportunities for housebuilding, the Government's Planning Practice Guidance sets out 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.
- 8.13 This standard methodology remains Government policy and the Inspectors do not consider there are exceptional circumstances to justify deviating away from using this methodology for Places for Everyone. As such, the Plan still identifies that 10,305 homes are required across the Plan area per annum. However, as a result of the proposed modification to the Plan period, the number of homes to be delivered over the lifetime of the Plan would increase from just under 165,000 to 175,185 new homes.
- 8.14 The Plan also continues to support Greater Manchester's commitment to deliver more affordable housing, including homes for social or affordable rent. Local plans will set targets for the provision of affordable housing based on local evidence of need and viability.
- 8.15 For Bury, Places for Everyone will still identify the same annual average requirement of 452 homes per year. However, because of the modification to increase to the Plan period by one year, the number of homes to be delivered over the lifetime of the Plan in Bury will increase from 7,228 to 7,678.
- 8.16 The Government's standard methodology gives Bury a Local Housing Need (LHN) for 10,047 homes over the Plan period (591 homes per year). However, the strategy that is proposed in Places for Everyone gives Bury a lower requirement of 7,678 homes, which equates to 76% of Bury's LHN.
- 8.17 To help to deliver the Plan's housing requirement for Bury, the following strategic allocations remain in the Plan with the overall quantum of development unchanged from that identified in the submitted version of Places for Everyone:

Table 1 – Places for Everyone housing allocations

Site	No. of homes
JPA1.1 Northern Gateway (Heywood/Pilsworth - Castle Road)	200
JPA1.2 Simister/Bowlee	1,350
JPA7 Elton Reservoir	3,500
JPA8 Seedfield	140
JPA9 Walshaw	1,250

Modifications to Bury’s housing allocation policies

8.18 In a similar way to the situation with Policy JPA1.1 Northern Gateway (Heywood/Pilsworth) referred to earlier in this report, the Inspectors have required several modifications to Bury’s housing allocation policies to ensure consistency in wording across all the site allocation policies and to remove generic policy criteria that repeat requirements that are covered elsewhere in the Plan.

8.19 Again, modifications are also proposed for each of the housing allocation policies to include a criterion that signposts the reader to a new Appendix D (which sets out the indicative highways and transport interventions for the site) and refers to Policy JP-C7 which sets out transport requirements of new development. This is to replace specific references to the indicative interventions within the policies themselves.

8.20 The Inspectors have also required several other modifications to Bury’s housing allocation policies, including the following:

JPA1.2 – Simister/Bowlee

8.21 The previous boundary of the Simister/Bowlee site excluded Heywood Old Road which meant that the land to the east and west were shown as two distinct parcels. It is now proposed to amend this to include the stretch of Heywood Old Road between the two to make it clear that this is a single site and that the policy requirements set out under JPA1.2 apply across its entirety.

8.22 Furthermore, in terms of the policy for the Simister/Bowlee allocation, additional criteria are proposed in relation to:

- A requirement for compensatory improvements to remaining Green Belt;
- The definition and strengthening of remaining Green Belt boundaries, where necessary; and
- Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas.

JPA7 - Elton Reservoir

8.23 Whilst the overall quantum of development at the Elton Reservoir site remains unchanged, the modification to extend the Plan period to 2039 means that the extent of development on this site within the Plan period is anticipated to increase from 1,900 to 2,100.

8.24 In addition, it is proposed to modify the area of retained Green Belt within the Elton Reservoir site to ensure that its boundary is strengthened by following that of the Elton Goyt Site of Biological Importance (SBI). This will also have the added benefit of helping to address concerns raised in respect of the potential impact of development on the southern part of this SBI.

8.25 In terms of modifications to the Elton Reservoir policy, additional/amended criteria are also proposed in relation to:

- Specific reference to the replacement of existing recreation space at Warth Fold;
- A requirement for compensatory improvements to remaining Green Belt within the site;
- The definition and strengthening of remaining Green Belt boundaries, where necessary;
- The need to take account of specific Sites of Biological Importance; and
- Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas.

Seedfield

8.26 In terms of modifications to the policy for the Seedfield allocation, additional criteria are proposed in relation to:

- A requirement for compensatory improvements to remaining Green Belt within the site; and
- Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas.

Walshaw

- 8.27 Members will recall that on 7 September 2022, Cabinet authorised officers to request a main modification to Places for Everyone involving the removal of the proposed housing allocation at Walshaw (JPA9) in light of updated evidence on housing supply and, specifically, the identification of new opportunities for housing in Bury and Radcliffe town centres that were not confirmed at the time that the Plan was submitted.
- 8.28 The report to Cabinet in September 2022 highlighted that during the examination of the Plan, it was likely that there would be extensive debate regarding the Plan's approach and there were inevitably inherent risks that the Inspectors overseeing the examination may not agree with the Plan's general approach to housing or to Bury's proposed main modification to remove the Walshaw site.
- 8.29 The report also highlighted that the Plan's approach to housing was already facing significant challenge from a wide range of stakeholders, developers, groups and organisations and that these challenges would be considered in depth during the examination of the Plan. It also highlighted that it was highly likely that any request for main modifications will be subject to challenge during the examination in terms of whether the proposed modification is necessary to make the Plan sound and/or legally compliant.
- 8.30 The request for a main modification to remove the site at Walshaw was subsequently set out in both the Council's written statement for the site allocations and in an early version of the schedule of proposed main modifications that was prepared for the opening of the hearing sessions in November 2022.
- 8.31 However, during the opening hearing session, the Inspectors requested that this proposed modification be removed from the schedule on the basis that they would only come to a view on whether the inclusion of Walshaw would render the Plan unsound once they had considered a range of other matters including:
- the spatial strategy;
 - what the housing requirement should be for each district;
 - the available evidence about the existing housing supply, and what it told them about whether exceptional circumstances exist to release Green Belt for site allocations; and
 - whether each of the site allocations is suitable and justified.
- 8.32 As referred to previously, the Inspectors have stated that they are satisfied at this stage of the examination that all of the proposed main modifications are necessary to make the Plan sound and would be effective in that regard.

- 8.33 The Inspectors have recommended modifications to the wording of the Walshaw policy but have made no reference to the proposed modification to remove the Walshaw site. This effectively means that the Inspectors are satisfied that the Walshaw allocation is sound (subject to modifications to the policy wording) and that they will not be recommending that the site be removed from the Plan.
- 8.34 In terms of modifications to the policy for the Walshaw allocation, additional criteria are proposed in relation to:
- A requirement for compensatory improvements to remaining Green Belt;
 - The definition and strengthening of remaining Green Belt boundaries, where necessary; and
 - Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas.
- 8.35 The proposed modifications are not considered to substantively change any of Bury's housing allocation policies.

Environment

- 8.36 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.
- 8.37 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.
- 8.38 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 remains that there is an expectation that all new development to be net zero carbon by 2028.

Brownfield land preference

- 8.39 There remains a strong focus in the Plan 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 enables us to minimise the release of greenfield and Green Belt land for development.
- 8.40 The land supply identified for development in the Plan is largely within the existing urban area, as set out in Table 2.

Table 2 – Percentage of land supply within the existing urban area

Land supply	% in urban area
Offices	98%
Industrial and warehousing	51%
Housing	90%

- 8.41 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 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.

Green Belt

- 8.42 Places for Everyone includes a limited release of Green Belt for both housing and employment. Taking into account the proposed modifications to the Plan, the net loss of Green Belt proposed is 2,213 hectares. This compares to a net loss of 1,754 hectares in the submitted Places for Everyone.
- 8.43 The policies in the Plan would result in the overall extent of the nine authorities' Green Belt reducing by 4.1%. The previously adopted Green Belt covers almost 47% of the land covered by the nine authorities. The policies in Places for Everyone Plan would reduce this to just under 45% of the Places for Everyone authorities remaining as designated Green Belt.
- 8.44 Although the net loss of Green Belt is now higher than what was proposed in the submitted Places for Everyone Plan, this is not because of more land being proposed for release by the introduction of additional development allocations or the expansion of proposed allocations. Instead, it is because the Inspectors have concluded that exceptional circumstances⁵ exist to justify

⁵ The test for adding new land to the Green Belt in paragraph 139 of the NPPF.

only 18 of the 49 proposed Green Belt additions and that only these 18 proposed additions should remain in the Plan as new areas of Green Belt.

8.45 The other 31 proposed Green Belt additions are therefore proposed to be removed from the Plan – including one proposed addition that is almost 200 hectares in size.

8.46 14 of the original 49 proposed Green Belt additions were in Bury as shown in Table 3.

Table 3 – Green Belt additions proposed for Bury in the submitted Plan

Green Belt Addition Ref	Proposed Green Belt Addition
GBA03	Pigs Lea Brook 1, Walmersley
GBA04	North of Nuttall Park, Ramsbottom
GBA05	Pigs Lea Brook 2, Walmersley
GBA06	Hollins Brook, Bury
GBA07	New Road, Radcliffe
GBA08	Hollins Brow, Bury
GBA09	Hollybank Street, Radcliffe
GBA10	Crow Lumb Wood, Ramsbottom
GBA11	Nuttall West, Ramsbottom
GBA12	Woolfold
GBA13	Nuttall East, Ramsbottom
GBA14	Chesham, Bury
GBA15	Broad Hey Wood North, Ramsbottom
GBA16	Lower Hinds, Bury

8.47 The Inspectors concluded that there are exceptional circumstances to justify 3 of these proposed additions – Pigs Lea Brook 2, Woolfold and Chesham on the basis that the boundary of the existing Green Belt adjacent to these sites are anomalous as they do not currently follow physical features that are readily recognisable on the ground.

- 8.48 Whilst the remainder will not be designated as Green Belt, it is important to note that these are largely covered by existing policy designations in the Unitary Development Plan and their status will be reviewed in conjunction with Bury's Local Plan.
- 8.49 The reduction in the Green Belt additions as proposed by the Inspectors does not, however, impact on the delivery of the overall Vision, Spatial Strategy and Strategic Objectives of the Plan.

9. Relationship with Bury's Local Plan

- 9.1 Places for Everyone is the strategic spatial plan that sets out a collective planning policy framework for the nine constituent boroughs. All policies within the Plan are 'strategic policies'. It is being prepared as a Joint Development Plan Document of the nine local planning authorities. Once Places for Everyone is adopted, it will form part of Bury's wider development plan. As such, Bury's Local Plan will need to be consistent with it and any neighbourhood plans would need to be in general conformity with the strategic policies within it.
- 9.2 The evidence that underpins Places for Everyone will also inform Bury's Local Plan but, as a strategic plan, it does not cover everything that the Local Plan will need to. The Local Plan will set out more detailed, locally-specific policies including both strategic and non-strategic policies. Appendix A of Places for Everyone sets out the policies in the relevant adopted district local plans (in Bury's case, the Unitary Development Plan) that will be replaced by policies in Places for Everyone.
- 9.3 In line with national policy, Bury's Local Plan will be expected to look ahead a minimum 15-year period from its adoption. In amending the Plan period from 2021 to 2037 to 2022 to 2039, Places for Everyone should provide an appropriate strategic policy framework for the Local Plan which will be produced following its adoption.
- 9.4 However, if the Plan period for Bury's Local Plan extends beyond 2039, the minimum requirement figures for employment floorspace and housing set out in Policies JP-J3, JP-J4 and JP-H1 should be used to inform Local Plan target(s).

10. Integrated Assessment and Habitats Regulations Assessment

- 10.1 As part of the development of Places for Everyone, an Integrated Assessment was undertaken incorporating the requirements of:
- Sustainability Appraisal: mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.

- Strategic Environmental Assessment: 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: required to be undertaken for plans, policies and strategies by the Equality Act 2010.
 - Health Impact Assessment: there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 10.2 The Integrated Assessment contributed to the development of Places for Everyone through an iterative assessment, which reviews the draft policies and the discrete site allocations against the Integrated Assessment framework.
- 10.3 A Habitats Regulations Assessment 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.
- 10.4 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.
- 10.5 The submitted Places for Everyone was assessed as a Plan that was considered likely to have significant effect on one or more European protected site and was therefore informed (and accompanied) by a Habitats Regulations Assessment with mitigation measures identified as appropriate.
- 10.6 The Inspectors have made it clear that the modifications they have decided should be made to the Plan should be subject to Sustainability Appraisal and Habitat Regulations Assessment as appropriate. Furthermore, the Inspectors have made it clear that the Sustainability Appraisal and Habitats Regulations Assessment reports will be subject to public consultation, alongside the modifications, before the end of the examination. Accordingly, addendums have been produced for both the Integrated Appraisal (incorporating the Sustainability Appraisal) and the Habitats Regulations Assessment, assessing the impact of the main modifications.
- 10.7 With regard to the Sustainability Appraisal, where individual policy scores have moved from positive to uncertain or neutral, the Appraisal acknowledges that when the Plan is read as a whole, the topic is covered in other relevant policies and therefore no residual impacts have been identified.

- 10.8 The outcome of the Habitat Regulation Assessment screening assessment is that there are no 'likely significant effects' on European sites, other than those identified in the submission version of the HRA. Therefore, it has not been necessary to amend the Places for Everyone Appropriate Assessment as a result of the proposed main modifications.
- 10.9 The Integrated Appraisal and Habitats Regulations Assessment addendum reports are available alongside this report and will be published alongside the main modifications schedule.

11. Evidence base

- 11.1 A comprehensive evidence base was assembled to support the policies and proposals within Places for Everyone which was made available for consultation in 2021. This evidence was submitted alongside the Plan in February 2022 and has remained available on the GMCA's website since then and throughout the examination. As one of the tests of soundness is whether a plan is justified by proportionate evidence, the Inspectors considered this evidence as part of their Examination into whether or not Places for Everyone is 'sound'.
- 11.2 As detailed above, this evidence base will also be used to inform Bury's Local Plan as this is developed, alongside other supporting evidence prepared as necessary.

12. Proposed changes to the National Planning Policy Framework

- 12.1 In December 2022, the Government consulted on changes to the National Planning Policy Framework (NPPF). The consultation ran from 22 December 2022 to 2 March 2023. The consultation sought views on a proposed approach to updating the NPPF whilst, at the same time, seeking views on proposals to prepare national Development Management policies, how policy could be developed to support levelling up, and how national planning policy is currently accessed by users.
- 12.2 The Inspectors made a statement that, in light of the transitional arrangements (contained within the draft NPPF changes), they would carry on with the examination as programmed in the context of the tests of soundness set out in current National Planning Policy Framework, published in 2021.
- 12.3 The Government is still analysing the consultation responses and, as such, the draft (as proposed to be changed) version of the NPPF cannot be used to determine whether a Plan is sound. Accordingly, it would be unlawful to propose any main modification to Places for Everyone and/or withdraw from the Plan on the basis of the draft proposed changes to the NPPF. This is

especially the case given that Places for Everyone is at such an advanced stage of preparation.

- 12.4 As the Department for Levelling Up, Housing, and Communities is currently analysing the feedback to the consultation and no changes to the National Planning Policy Framework have yet been published, the examination progressed through its scheduled programme of sessions on the basis of the current National Planning Policy Framework. The Inspectors duly issued their post hearing letter with the schedule of proposed main modifications that they consider are necessary to make the Plan sound and/or legally compliant and which should therefore be made available for a period of public consultation.
- 12.5 The schedule of main modifications (which is available alongside this report) represents those changes to the Plan that the Inspectors consider are necessary. They do not include any modifications on the basis of the draft proposed changes to the NPPF. To make further changes to the schedule, e.g. amending overall development targets, removing additional sites which Places for Everyone proposes to take out of the Green Belt and/or amending the Green Belt addition sites, on the basis of the consultation draft National Planning Policy Framework would not be lawful.

13. Previous consultations

- 13.1 Five consultations have taken place in relation to the Plan (as set out in Table 4 below), the first four in relation to the Greater Manchester Spatial Framework and the fifth in relation to Places for Everyone.

Table 4 – Previous consultation on the Plan

Date	Stage
November 2014	Scope and initial evidence base
November 2015	Vision, strategy and strategic growth options
October 2016	Draft Greater Manchester Spatial Framework
January 2019	Revised Draft Greater Manchester Spatial Framework
August 2021	Publication Places for Everyone

- 13.2 Consultation on the revised draft of the Greater Manchester Spatial Framework in 2019 generated over 17,000 responses and these informed the production of what was intended to be the Publication version of the Greater Manchester Spatial Framework. However, the withdrawal of Stockport Council in December 2020 prevented this version of the Plan proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare

Places for Everyone taking account of the consultation responses received in 2019.

14. Consultation on the modifications to Places for Everyone

- 14.1 Whilst anyone can make a representation in response to consultation on the main modifications, the Planning Inspectorate's Procedure Guide for Local Plan Examinations⁶ makes it clear (at section 6) that this consultation **only relates to the proposed main modifications and any consequential changes to the policies map and no other aspect of the Plan.**
- 14.2 Whilst it is only necessary to consult on the main modifications and any related policy map changes, it is also proposed to consult on the additional modifications so that the full extent of proposed changes to the Plan are clear. However, it should be noted that **the Inspectors will only consider comments received in relation to the main modifications. Any responses to consultation on the additional modifications will not be considered by the Inspectors as these do not affect the soundness of the Plan and do not fall within the scope of the examination.** Responses to the additional modifications will be considered by the Places for Everyone authorities.
- 14.3 The consultation will be carried out in line with the requirements of the relevant authority's Statement of Community Involvement and the guidance contained in the abovementioned Planning Inspectorate procedure guide. Paragraph 6.9 of the procedure guide states that *'the nature and duration of the consultation should reflect that of the consultation held at Regulation 19 stage, where appropriate'*.
- 14.4 Whilst there is a statutory requirement to consult for at least six weeks, consultation on Places for Everyone at the Regulation 19 stage ran for eight weeks and it is considered appropriate to replicate this duration for consultation on the modifications.
- 14.5 As part of the consultation on Places for Everyone at the Regulation 19 stage, Bury Council sent out letters to every household in the Borough (around 86,000) to inform them of the Plan and to highlight proposals that were particularly relevant to their Ward. These letters included a paragraph that encouraged people to register their interest with the Greater Manchester Combined Authority if they wished to be kept informed of the Plan.
- 14.6 However, given that paragraph 6.9 of the procedures guide states that consultation on the main modifications should 'reflect' that undertaken at the Regulation 19 stage 'where appropriate', this allows discretion and judgment-

⁶ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>

calls about what is appropriate in the very different circumstances of the Plan's main modifications and publication stages.

- 14.7 Because recipients of the previous household letters were given the opportunity to register their interest with the Combined Authority if they wished to be kept informed of the Plan, it is not considered necessary or appropriate to repeat this as part of consultation on the modifications.
- 14.8 It should be noted that the distribution of household letters is not a requirement of Bury's Statement of Community Involvement.
- 14.9 Consultation will be undertaken by the GMCA as well as each of the nine districts. In terms of consultation undertaken by the Council, consultation will be undertaken in accordance with Bury's Statement of Community Involvement (July 2023) and will involve:
- Making copies of the Places for Everyone modifications available for inspection at Bury Town Hall, Ramsbottom, Bury, Radcliffe and Prestwich Libraries and the Tottington Centre;
 - Distributing letters/emails to contacts on our consultation database to inform recipients of the consultation;
 - Making all relevant information available on the Council's web site;
 - Erection of site notices around the proposed site allocations and Green Belt additions;
 - Promoting the consultation through the Council's various social media accounts;
 - Preparing FAQs in relation to the consultation on the modifications;
 - Advertising the consultation on posters and on reception area TVs; and
 - Issuing a press release in relation to the consultation.

15. Next steps

- 15.1 Following the conclusion of consultation on the modifications, the representations received will be forwarded to the Programme Officers along with a report listing all of the representations; a summary of the main issues raised; and a brief response, on behalf of the nine districts, to those main issues.
- 15.2 The Inspectors will consider all the representations made on the proposed main modifications before finalising the examination report and the schedule of recommended main modifications. Further hearing sessions will not usually be held, unless the Inspectors consider them essential to deal with substantial issues raised in the representations, or to ensure fairness.

- 15.3 When deciding whether or not to recommend that the local planning authorities should make the main modifications, the Inspectors will normally consider them in the form in which they were published for consultation. However, in some limited circumstances, the responses to consultation may lead the Inspector to consider that a new main modification, or an amendment to one that has already been consulted on, is also necessary to make the Plan sound or legally compliant; or that a proposed main modification is not in fact necessary for soundness and should not be recommended.
- 15.4 The Inspectors may only recommend such changes to the main modifications without further consultation if they are satisfied that no party would be prejudiced as a result. For example, the consultation already undertaken on the main modifications might have adequately addressed the point, or the amendment might be a very minor one. Should further consultation be necessary a further report will be presented to the nine authorities for approval.
- 15.5 The Inspectors' report will be sent to the GMCA in electronic format for fact-check. The fact-check report will be sent to the Government (Department for Levelling Up Housing and Communities) on a for-information basis at least 48 hours before it is sent to the GMCA.
- 15.6 Once the fact-check has been completed and the Inspector has dealt with any points raised, the final report will be sent to the GMCA. This marks the completion of the examination.
- 15.7 The ultimate decision to adopt Places for Everyone must be taken by each of the Full Councils of the nine participating local authorities. This will be the subject of a further report at the appropriate time.

Links with the Corporate Priorities:

Places for Everyone will form part of Bury's statutory development plan. It will set out statutory policies and strategic site allocations that will guide future growth and development in the Borough. A key part of the Plan is to rebalance the Greater Manchester economy by significantly boosting the economic output from the north through the delivery of new housing and employment that will benefit both Bury and its residents. The 'Let's Do It' strategy specifically refers to Places for Everyone as having a key role to play in the delivery of its objectives and priorities.

Equality Impact and Considerations:

The Places for Everyone Publication Plan is a statutory plan which seeks to contribute to the achievement of sustainable development, delivering economic,

social and environmental benefits together in a mutually reinforcing way. It is informed by an Integrated Appraisal which includes an Equalities assessment.

The attached EqIA also concludes that there are no negative impacts on equality and a positive impact recorded.

Environmental Impact and Considerations:

The Places for Everyone Publication Plan will provide the strategic planning policy framework to support the nine districts in meeting Greater Manchester's ambition to be carbon neutral by 2038.

Assessment and Mitigation of Risk:

Risk / opportunity	Mitigation
<p>There are risks that the adoption of the Plan may be susceptible to challenge if it is not prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).</p> <p>Not approving the proposed modifications and to withdrawing from Places for Everyone would also present significant risk of the Borough being open to speculative and unplanned development with insufficient supporting infrastructure.</p> <p>Withdrawing from Places for Everyone to pursue an alternative plan could also result in Bury requiring a higher housing target and lead to the need for more Green Belt release.</p>	<p>Ensure that the Plan is prepared in accordance with the relevant statutory requirements and regulations.</p> <p>Places for Everyone forms part of the Borough's statutory development plan and continuing to progress the examination through consultation on the proposed modifications ensures the Council continues to make progress against the need to have an up-to-date plan in place.</p>

Legal Implications:

The legislative and constitutional requirements for the preparation of a joint Development Plan Document (DPD) in the Planning and Compulsory Purchase Act

2004 (“2004 Act”) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (“2012 Regulations”) have been complied with.

The joint plan was submitted to the Secretary of State for independent examination (s20 of the 2004 Act) along with the documents prescribed by Regulation 22 of the 2012 Regulations. Prior to its submission to the Secretary of State, the joint DPD was published and representations were invited, pursuant to Regulation 19 and Regulation 20 of the 2012 Regulations. The Joint DPD is currently at the independent examination stage, as prescribed by section 20 of the 2004 Act; the modifications consultation stage falls within that stage of the plan preparation process.

If the joint DPD is not prepared in accordance with the 2004 Act and the 2012 Regulations, any subsequent attempt to adopt the Plan would be susceptible to challenge.

Financial Implications:

The original plan has already been subject to a rigorous consultation process. However, the Council must now consult on the modifications to the plan. The methods of consultation are detailed at 14.9 within this report. The bulk of the costs will be covered by GMCA who are producing all of the documentation, there will be a small costs to the Council in terms of communicating with via distributing letters/emails to contacts on our consultation database.

Once the plan is adopted there will be capital receipts generated for the Council and it will be the private sector or registered providers who will deliver the developments.

Appendices:

None.

Background papers:

[Report to AGMA Executive Board \(December 2020\):](#) Greater Manchester’s Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework Publication Plan 2020 – Next Steps.

[Report to AGMA Executive Board \(February 2021\):](#) Places for Everyone: A Proposed Joint Development Plan Document of Nine GM Districts.

[Report to Places for Everyone Joint Committee \(July, 2021\):](#) Places for Everyone Publication Plan 2021: A Joint Development Plan Document for 9 Greater

Manchester Local Authorities (Bolton, Bury Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, Wigan).

[Report to Bury Cabinet \(July 2021\):](#) Publication of the Places for Everyone Joint Plan.

[Schedule of Proposed Main Modifications.](#)

[Schedule of Proposed Additional Modifications.](#)

[Schedule of Policies Map/Diagrams/Pictures Modifications.](#)

[Composite Plan 2023:](#) Places for Everyone with all modifications highlighted (Main and Additional).

[Integrated Assessment 2023 Addendum.](#)

[Habitats Regulations Assessment Addendum 2023.](#)

[Bury Statement of Community Involvement \(July 2023\)](#)

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

Term	Meaning