

Classification:

Open

Decision Type:

Key

Report to:	Council	Date: 20 March 2024
Subject:	Adoption of Places for Everyone Plan: A Joint Development Plan Document for nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) 2022-2039 (The Places for Everyone Plan).	
Report of	Leader and Cabinet Member for Strategic Growth	

1. Summary

- 1.1 This report seeks the approval of Council to formally adopt The Places for Everyone Plan - incorporating the Main Modifications, amendments to the Policies Map and Additional Modifications - in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("2012 Regulations") and the Planning and Compulsory Purchase Act 2004 (as amended) ("2004 Act").
- 1.2 Due to the large sizes of the various appendices these can be viewed on the GMCA website at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/adoption/adoption-documentation>.

2. Recommendations

- 2.1 That Council:
- (i) Accept the findings of the Inspectors' Report and approve the Main Modifications to the Places for Everyone Joint Development Plan Document proposed by the independent Inspectors, as set out in [Appendix 1.1 and 1.2](#) to this report, for incorporation into the final version of the Places for Everyone Joint Development Plan Document;
 - (ii) Approve the amendments to the Places for Everyone Joint Development Plan Document Policies Map, as set out in [Appendix 2](#) to this report, for incorporation of all the changes which relate to Bury Council's administrative area into the Bury Policies Map;
 - (iii) Approve the Additional Modifications to the Places for Everyone Joint Development Plan Document, as set out in [Appendix 3](#) to this report, for incorporation into the final version of the Places for Everyone Joint Development Plan Document;

- (iv) Adopt the Places for Everyone Joint Development Plan Document 2022 – 2039 (provided in [Appendix 4](#)), with effect from 21 March 2024 – incorporating the Main Modifications and Additional Modifications – as part of the Development Plan for Bury, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 (as amended);
- (v) Adopt the Policies Map ([Appendix 5](#)) which incorporates the Modifications to it ([Appendix 2](#)) and is necessary to give effect to the policies of the Places for Everyone Joint Development Plan Document; and
- (vi) Delegate authority to the Executive Director (Place), to make any minor non-material editorial amendments to the Places for Everyone Joint Development Plan Document and Policies Map ahead of its final publication, subject to consultation and agreement with the eight other Places for Everyone authorities. These amendments will be limited to correcting minor errors and formatting text.

3. Reasons for recommendation(s)

- 3.1 To ensure that the Places for Everyone Joint Development Plan is formally adopted as an up-to-date part of Bury's statutory development plan.

4. Alternative options considered and rejected

- 4.1 To not approve the adoption of Places for Everyone.
- 4.2 However, this option is rejected for several key reasons:
 - 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;
 - 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;
 - Using the Government's standard methodology for calculating housing needs would mean that Bury would continue to be subject to the 'presumption in favour of sustainable development' for the foreseeable future; and
 - The Plan's proposal at the Northern Gateway (Heywood/Pilsworth) represents Bury's key opportunity for new inward investment, economic growth and job creation. The site is a transformational opportunity to deliver around 1.2 million sq.m. of employment floorspace and around

19,000 quality jobs that would be accessible to Bury residents. It would be extremely difficult to justify the Northern Gateway site outside of the joint plan process without the wider GM context and a strategy to boost northern competitiveness.

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5. Background

- 5.1 Every Council has a statutory duty to prepare a Local Plan, with a requirement set in law that planning decisions must be taken in line with the Local Plan unless material considerations indicate otherwise. Indeed, in a recent letter to the Mayor of Greater Manchester, the Secretary of State has reaffirmed his Government's dedication to a plan-led system and its role in ensuring housing requirements are planned for appropriately ([Appendix 6](#)).
- 5.2 The Places for Everyone Plan: A Joint Development Plan Document for nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) 2022-2039 (PfE) is the strategic spatial plan for the nine constituent boroughs and, as such, sets out a collective planning policy framework. 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 the PfE Plan is adopted it will form part of Bury's development plan and will be used to assess individual planning applications. As such, Bury's Local Plan will need to be consistent with it and neighbourhood plans will need to be in general conformity with the strategic policies.
- 5.3 The PfE Plan is a strategic plan and it does not cover everything that Bury's Local Plan would. Therefore, Bury's Local Plan will set out more detailed policies including both strategic and non-strategic policies, as appropriate, reflecting local circumstances. Appendix A of the PfE Plan sets out the policies in the relevant adopted GM district local plans which will be replaced by the Places for Everyone Plan.

- 5.4 Bury's Local Plan will be expected to look ahead a minimum period from its adoption, in line with national policy. In amending the plan period from 2020 to 2037 to 2022 to 2039 the PfE Plan will provide an appropriate strategic policy framework for Bury's Local Plan which will be produced following its adoption.
- 5.5 In 2014 the 10 Greater Manchester local authorities resolved to prepare a joint development plan, known as Greater Manchester Spatial Framework (GMSF). Following the decision of Stockport council to withdraw from the GMSF, the remaining nine GM authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) decided to progress a joint plan of the nine and this became known as "Places for Everyone" (PfE). Before "submission" the PfE Plan had been the subject of various consultations since its inception in 2014:
- November 2014 - Scope of the plan and the initial evidence base (Regulation 18 of the 2012 Regulations);
 - November 2015 - Vision, strategy and strategic growth options (Regulation 18 of the 2012 Regulations);
 - October 2016 –Draft Greater Manchester Spatial Framework (Regulation 18 of the 2012 Regulations);
 - The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) (Regulation 18 of the 2012 Regulations); and
 - Publication version of Places for Everyone (Pre-Submission Consultation) 2021 (Regulation 19 of the 2012 Regulations).
- 5.6 Full details of the consultation undertaken, the key issues raised at each stage of consultation and how these issues have been taken into account in the plan making process up until submission, are set out in the [Statement of Consultation 2022](#) which is available to view on the GMCA web site.
- 5.7 The PfE Plan was submitted to the to the Secretary of State on 14 February 2022, pursuant to Reg. 22 of the Local Planning Regulations ('Submission stage'). This marked the beginning of the independent examination into the plan, the final stage in the plan making process. Three Inspectors were appointed to examine whether the submitted plan met the tests of soundness defined in the National Planning Policy Framework (NPPF)¹ and met all the relevant legislative requirements, including the duty to co-operate².

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.

- 5.8 The public hearing sessions started at the beginning of November 2022 and sat for 12 weeks in total, including a final session at the beginning of July 2023.
- 5.9 The Inspectors' post hearing note ([IN39](#)) was published on the examination website on 11th August 2023, setting out their conclusions on the key issues of soundness and the Main Modifications that would be required to ensure the Plan was sound. A consultation on the Main Modifications was carried out for a period of 8 weeks, between 11 October and 6 December 2023. More detail on this consultation is provided in Section 3 below.
- 5.10 Having considered the consultation responses to the Main Modifications, the Inspectors' Report was published by the GMCA on behalf of the nine local authorities on 15 February 2024. The Report concludes that subject to inclusion of the Main Modifications, the Plan is sound, complies with all relevant legal requirements and provides an appropriate basis for the planning of the nine boroughs. The Inspectors are satisfied that where necessary the local planning authorities engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has been met.
- 5.11 It should be noted that the Council can only adopt the PfE Joint Development Plan Document if it incorporates all the Main Modifications as recommended by the independent Inspectors.

6. Main Modifications

- 6.1 The Inspectors' post hearing note ([IN39](#)) set out their conclusions on the key issues of soundness. In summary the Inspectors concluded that:
- No significant changes were required to the spatial strategy policies.
 - No significant changes were required in relation to the scale of distribution of employment and housing.
 - Exceptional circumstances case was not made for release of Green Belt sites JPA10 (Global Logistics) and JPA28 (North of Irlam Station).
 - Exceptional circumstances case was not made for 31 of the 49 proposed Green Belt Additions.
 - Some Modifications were required to policy wording to ensure that they were consistent, removed duplication and were therefore effective.
- 6.2 A schedule of Main Modifications was prepared and agreed with the Inspectors. A schedule of 'Additional Modifications' was also prepared. These were amendments which were not required to address issues of soundness, for example typographical issues, but were included for completeness. The

Inspectors have not considered the responses to the additional modifications, this is a role for the districts and a report summarising the responses is attached ([Appendix 3](#)). The Additional Modifications (taken together) do not materially affect the policies set out in the PfE Plan if it is adopted with the Main Modifications. A composite plan was prepared which showed the Main Modifications and Additional Modifications to help people understand the proposed changes and help them to respond to the consultation.

- 6.3 The Main Modifications underwent further Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment, which were consulted on, alongside the modifications themselves. All of the Main Modifications consultation documents are available to view on the [GMCA website](#).
- 6.4 Following approval by all nine PfE authorities, (details of the individual meetings can be found on the [GMCA website](#)), the Modifications were published for a period of public consultation which ran for 8 weeks, from 11 October – 6 December 2023. 177 representations were received in total. A list of respondents is published on the examination website (see Examination document [RMM1](#)). All of the responses are available on the [GMCA website](#).
- 6.5 A report listing all of the representations, a summary of the main issues raised and a brief response to those main issues was prepared and published on the examination website (see Examination document [RMM2](#)).
- 6.6 A 'Summary of Key Issues' report was also prepared and is available on the examination website (see Examination document [RMM3](#)). The main issues raised related to:
 - Extension of the plan period.
 - Relationship to district local plans.
 - Cancellation of HS2.
 - Implications of proposed changes to National Planning Policy Framework.
 - Approach to Brownfield Land in Sustainable Development policy (JP-S1).
 - Modifications to the Carbon and Energy policy (JP-S2).
 - Modifications to the Affordable Housing policy (JP-H2).
 - Retention of the Walshaw site (JPA9).
 - Approach to streamlining allocation policies.
 - Inadequacy of Integrated Assessment.

- Inadequacy of consultation.

6.7 It was not considered that any new substantive issues were raised during the consultation which required further work and/or further hearing sessions, however a small number of further Main Modifications were identified which were considered necessary to make the plan sound, particularly in relation to HS2. A schedule of these further main modifications was submitted to the Inspectors and is published on the examination website (see Examination document [RMM4](#)).

7. Changes to national planning policy

7.1 Following the closure of the Modifications consultation, Government published two documents which had potential implications for PfE.

7.2 Government published a [Written Ministerial Statement](#) on energy efficiency on 13 December 2023, alongside a consultation on the [Future Homes and Buildings Standard](#). It states that *“the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations”*. The WMS goes on to clarify that:

“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)”

7.3 A further main modification was proposed to policy JP-S2 to reflect this statement (see Examination document [RMM4](#)).

7.4 A revised National Planning Policy Framework ([NPPF](#)) was published on 19 December 2023 (as amended). In terms of PfE, the most significant section is the provision in Annex 1, paragraph 230 (‘transitional arrangements’):

“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework...”

- 7.5 The 'pre-submission' stage referred to is the Regulation 19 or 'Publication' stage. The Publication stage consultation on the PfE plan took place in August 2021. As such, the examination of PfE continued under the relevant previous version of the Framework and was unaffected by the changes in the December 2023 version in relation to plan-making.
- 7.6 Once the PfE plan is adopted, the policies in NPPF (December 2023) will apply until such time as it is superseded.
- 7.7 A further Main Modification was proposed in relation to Policy JP-H1 to reflect the proposed changes to the requirement for local authorities to maintain a 5-year supply of housing sites.

8. The Inspectors' report

- 8.1 The Inspectors' Report³ was published by the GMCA on behalf of the nine local authorities on 15 February 2024. The report concludes "*...that all legal requirements have been met and that with the recommended main modifications set out in the Appendix the Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound*" (paragraph 938).
- 8.2 The main modifications can be summarised as follows:
- Various changes to clarify the relationship between, and relative roles of, the Plan, and individual local plans, and to clarify that the Plan does not apply to the parts of Oldham that are within the Peak District National Park.
 - Extension of the plan period to look ahead to 2039 (rather than 2037), and updates to the housing and employment land supply information to 2022 (rather than 2021).
 - Clarifications to spatial strategy policies JP-Strat1 to JP-Strat11 and associated diagrammatic maps, and deletion of High Crompton Broad Location from policy JP-Strat7.
 - Extensive changes to the detailed wording of site allocation policies JPA1 to JPA37 to ensure they are consistent with national policy, justified, internally consistent and effective in achieving sustainable development having regard to relevant site-specific issues.

³ Please note that PfE Plan policy and paragraph numbers referenced in the Inspectors' Report, relate to the Submission version of the Plan – Examination document reference SD1 (For reference, a schedule of current and submitted plan policy numbers is provided in Appendix 7).

- Deletion of allocation JPA10 Global Logistics and retention of parts of the site in the Green Belt.
- Deletion of allocation JPA28 North of Irlam Station and retention of the site in the Green Belt.
- Amendments to the site boundaries of allocations JPA1.2 Simister and Bowlee; JPA3.2 Timperley Wedge; JPA14 Broadbent Moss; JPA18 South of Rosary Road; JPA26 Hazelhurst Farm; and JPA32 South of Hyde.
- Modifications to policies JP-S1 to JP-S7 to ensure consistency with national policy and effectiveness, including deletion of policy JP-S4 Resilience as it serves no decision-making purpose.
- Modifications to policies JP-J1 to JP-J4 to reflect changes to the plan period, and to remove unnecessary or inconsistent requirements.
- Clarifications to policies JP-H1 to JP-H4 relating to housing development, and changes to the approaches to phasing and five-year supply to ensure consistency with national policy and that housing needs are met as soon as possible.
- Modifications to policies JP-G1 to JP-G7 to ensure consistency with national policy and effectiveness.
- Changes to JP-G5, JP-G9, JP-C7 and relevant site allocation policies relating to the South Pennine Moors, Rochdale Canal and Manchester Mosses protected habitats having regard to the habitat regulations assessment.
- Changes to policies JP-G9 and site allocation policies relating to biodiversity including any irreplaceable habitats on sites containing peat.
- Changes to JP-G2 and site allocation policies to secure compensatory improvements to the environmental quality and accessibility of remaining Green Belt.
- Deletion of policy JP-G8 relating to green space standards.
- Deletion of policy JP-G11 relating to safeguarded land.
- Modifications to policies JP-Strat12, JP-P1 to JP-P7 to ensure consistency with national policy and effectiveness.
- Inclusion of an additional policy in chapter 10 relating to the strategic road network.

- Various changes to the transport improvements referred to in the Plan, and addition of Appendix D setting out indicative transport mitigations for each allocation.
 - Deletion of 30 of the 49 Green Belt additions proposed in the Plan.
 - A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.
- 8.3 The Inspectors did not consider that the further main modification to Policy JP-S2 referred to in Section 4 above, was necessary to make the plan sound. Their reasons are set out in paragraph 721-724 of their Report.
- 8.4 The Inspectors accepted the proposed further modification to Policy JP-H1 referred to in Section 4 above and proposed some further wording to the reasoned justification. There is a typographical error in the Main Modifications schedule in relation to MM7.2 at paragraph 7.19. This should read Table 7.2 not Table 7.1.

9. Policies Map

- 9.1 The Policies Map is not defined in legislation as a development plan document. This means it is not formally part of the PfE Plan that it is intended will be adopted, nor was it within the Planning Inspectors' remit to recommend main modifications to it. However, local planning authorities must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan.
- 9.2 When the PfE Plan was submitted for examination, the PfE authorities were required to provide a Submission Policies Map showing the changes to the adopted Policies Maps within the PfE authorities, that would result from the proposals in the submitted PfE Plan. Subsequent to this, a number of modifications to the Policies Map were proposed during the plan's examination and these were consulted upon alongside the Main and Additional Modifications.
- 9.3 The Council will adopt the Policies Map ([Appendix 5](#)) incorporating the changes which relate to Bury Council's administrative area into the Bury Policies Map

10. What does the modified Places for Everyone Plan mean for Bury?

- 10.1 The main modifications to the PfE Plan that have been recommended by the Inspectors are included at [Appendix 1.2](#) to this report and the modified PfE Plan that is proposed for adoption at [Appendix 4](#).

- 10.2 Whilst the Inspectors have recommended a significant number of modifications, they do not change the overall Vision, Objectives and Spatial Strategy of the Plan.

Plan period

- 10.3 The submitted Places for Everyone Plan covered a plan period from 2021 to 2037. However, the Inspectors are recommending a modification 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 Plan'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

- 10.4 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 whilst recognising the important green infrastructure assets in the area.

Jobs

- 10.5 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 Everyone continues the approach of attracting investment in our city and town centres alongside recognising the importance of investing in strengthening

⁴ Paragraph 22.

existing and creating new employment locations, so that all communities are able to contribute to, and benefit from, growth.

- 10.6 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. The Inspectors are recommending that these figures be modified to reflect the revised Plan period and will inform the preparation of district local plans.
- 10.7 JPA1.1 Northern Gateway (Heywood Pilsworth) is identified in the plan 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.

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

- 10.8 Following discussions at the hearing session regarding the Northern Gateway (Heywood/Pilsworth) site, the Inspectors have recommended several main modifications to Policy JPA1.1 (see. 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.
- 10.9 A modification is also recommended 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-C8 which sets out transport requirements of new development. This is to replace specific references to the indicative interventions within the policy itself.

- 10.10 A number of other modifications are recommended 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.
- 10.11 The recommended modifications are not considered to substantively change Policy JPA1.1 for the Northern Gateway (Heywood/Pilsworth) site.

Homes

- 10.12 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.
- 10.13 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.
- 10.14 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 recommended 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.
- 10.15 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.
- 10.16 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.
- 10.17 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.
- 10.18 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

Recommended modifications to Bury’s housing allocation policies

- 10.19 In a similar way to the situation with Policy JPA1.1 Northern Gateway (Heywood/Pilsworth) referred to earlier in this report, the Inspectors have recommended 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.
- 10.20 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-C8 which sets out transport requirements of new development. This is to replace specific references to the indicative interventions within the policies themselves.
- 10.21 The Inspectors have also recommended several other modifications to Bury’s housing allocation policies, including the following:
- JPA1.2 – Simister/Bowlee
- 10.22 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. The Inspectors have recommended that this be amended 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.

10.23 Furthermore, in terms of the policy for the Simister/Bowlee allocation, the Inspectors have recommended additional criteria in relation to:

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

JPA7 - Elton Reservoir

10.24 Whilst the overall quantum of development at the Elton Reservoir site remains unchanged, the recommended 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.

10.25 In addition, the Inspectors have recommended a modification to the area of retained Green Belt within the Elton Reservoir site to ensure that its boundary is strengthened by following that of the Elton Goit 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.

10.26 In terms of modifications to the Elton Reservoir policy, the Inspectors have recommended additional/amended criteria 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 the boundaries of the retained areas of Green Belt within the site;
- 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.

Seedfield⁵

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

⁵ Part of the Seedfield allocation has come forward outside the PfE process and now has planning permission for 80 units.

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

Walshaw

- 10.28 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.
- 10.29 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.
- 10.30 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.
- 10.31 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.
- 10.32 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.

10.33 The Inspectors' conclusions in respect of the proposed modification to remove the Walshaw site are set out in paragraph 367 of their report where they state:

'During the examination, the GMCA proposed that allocation JPA9 Walshaw should be deleted from the Plan as they considered it was no longer needed due to updated evidence about housing land supply in Bury. However, for reasons set out elsewhere in this report, we are satisfied that the overall number and distribution of new homes proposed in policy JP-H1 Table 7.2 (as modified) is justified. Furthermore, the modification to the plan period that we recommend results in a reduced flexibility allowance in the overall housing land supply for the plan area. This reinforces the need for the allocation to help deliver the spatial strategy. Therefore, we consider the allocation of the site is justified in principle as it makes an important contribution to meeting housing needs in Bury, the northern areas, and the city region as a whole.'

10.34 In conclusion, paragraph 377 of the Inspectors' Report states that:

'Subject to the main modifications set out above we are satisfied that Policy JPA9 Walshaw is justified, consistent with national policy and will be effective in achieving sustainable development.'

10.35 In terms of modifications to the policy for the Walshaw allocation, the Inspectors have recommended additional criteria in relation to:

- A requirement for compensatory improvements to remaining Green Belt in the vicinity of the site;
- The definition and strengthening of boundaries of the Green Belt to the south-east of the site; and
- Consideration of the extraction of any viable mineral resources within Mineral Safeguarding Areas.

10.36 The recommended modifications are not considered to substantively change any of Bury's housing allocation policies.

Environment

10.37 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.

10.38 The Plan supports the important role of our natural assets by:

- Valuing the special qualities and key sensitivities of our landscapes;
- Seeking to protect and enhance our network of green and blue infrastructure;
- Seeking an overall enhancement of biodiversity and geodiversity; and
- Seeking to maintain a new and defensible Green Belt which plays an important role in restricting unplanned development.

10.39 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.

Brownfield land preference

10.40 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.

10.41 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%

10.42 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

10.43 The Plan includes a limited release of Green Belt for both housing and employment. Across the nine districts, the net loss of Green Belt proposed is

2,210 hectares, a 4.1% reduction in Green Belt. The previously adopted Green Belt covers almost 47% of the land covered by the nine districts. The policies in the PfE Plan would reduce this to just under 45% of the PfE authorities remaining as designated Green Belt.

- 10.44 In terms of Bury, the net loss of Green Belt proposed is 572 hectares. However, it should be noted that over 330 hectares (58%) of this is at the Northern Gateway (Heywood/Pilsworth) site which is identified in the Plan as a large, nationally significant location for new employment-led development which will bring transformational levels of investment and jobs into Bury. Furthermore, 53.8% of the Borough's total area would remain as Green Belt. This is higher than the average across the nine districts and, individually, only Rochdale (59.7%) and Wigan (55.7%) would have higher percentages of Green Belt.
- 10.45 The collective net loss of Green Belt is now higher than what was proposed in the submitted Places for Everyone Plan. However, 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 circumstances exist to justify 19 of the 49 proposed Green Belt additions and recommended that the other 30 proposed additions be removed from the Plan.
- 10.46 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

- 10.47 The Inspectors have 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.
- 10.48 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.
- 10.49 The reduction in the Green Belt additions as recommended by the Inspectors does not, however, impact on the delivery of the overall Vision, Spatial Strategy and Strategic Objectives of the Plan.

11. Integrated Assessment

- 11.1 The Integrated Assessment (IA) has contributed to the development of the PfE through an iterative assessment, which reviewed the draft policies and the discrete site allocations against the IA framework. This has ensured the full range of environmental impacts have been assessed and appropriate mitigation measures included, where necessary. The IA documentation can be found in documents [SD8 to SD17](#) and [MDC6 to MDC12](#).

12. Habitats Regulations Assessment

- 12.1 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.
- 12.2 The PfE2021 was assessed as a Plan which was considered likely to have significant effect on one or more European protected site and was therefore informed (and accompanied) by an HRA (November 2022) with mitigation measures identified as appropriate. as set out in the HRA of PfE, November 2022. The outcome of the screening assessment of the Main Modifications to

the PfE was that none of them would have a Likely Significant Effect on European designated sites and therefore do not change the findings of the HRA of the PfE, November 2022.

- 12.3 In November 2022 the HRA concluded that traffic levels resulting from a combined impact of development proposed in both the PfE Plan and Warrington's local plan could create an adverse air quality impact on the Holcroft Moss compartment of the Manchester Mosses SAC. Consequently, air quality mitigation is proposed in both the PfE Plan and the Warrington Local Plan for the Holcroft Moss site, in the form of a developer contribution towards a Habitat Mitigation Plan and the provision of measures to reduce reliance of cars, reduce trip generation and promote ultra-low vehicle emissions. The details of the developer contribution will be set out in district supplementary planning documents following adoption of the PfE plan.
- 12.4 The HRA of the PfE, November 2022 also identified an adverse impact on the South Pennine Moors SAC/SPAs as a result of increased recreation pressure arising out of development levels proposed in the PfE. Consequently, the PfE Plan proposes recreation disturbance mitigation in the form of a development exclusion zone within 400m of the Moors, a requirement to assess and mitigate land for functionally linked habitats within 2.5km of the Moors and a requirement for development to provide or contribute towards the provision of Suitable Alternative Natural Greenspace and a Strategic Access, Monitoring and Management Strategy within 7km of the Moors remains a suitable mitigation package. Oldham, Rochdale and Tameside councils will set out details of the developer contributions within supplementary planning documents.

13. Next steps

- 13.1 Subject to and following Council's decision, officers will complete the final tasks that need to be undertaken in order to meet the requirements of the relevant regulations. This includes preparing an Adoption Statement and making the following documents available on the council's website and at Bury Town Hall; Ramsbottom, Bury, Radcliffe and Prestwich libraries; and the Tottington Centre during their normal opening hours:
- Places for Everyone Joint Development Plan Document (PfE Plan).
 - Places for Everyone Policies Map.
 - Integrated Appraisal Reports (including Sustainability Appraisal Report).
 - Adoption Statement.
 - Details of where the PfE Plan is available for inspection and the times at which the document can be inspected.

- 13.2 The council will issue the Adoption Statement in line with the relevant regulations.
- 13.3 In addition to these documents, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, the council will publish a Sustainability Appraisal post adoption statement, which explains how the sustainability appraisal reports undertaken at various stages during the preparation of the PfE Plan meet the requirements of these regulations.
- 13.4 Once the PfE Plan has been adopted, it will become part of the statutory development plan for Bury with immediate effect. This means that it will have full weight in the determination of planning applications in Bury. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 13.5 If the Council adopts the PfE Plan, in accordance with section 113 of the Planning and Compulsory Purchase Act (2004), any person aggrieved by the adoption of the PfE Plan can only challenge this by making an application to the High Court on one of two grounds; that the PfE Plan is not within the appropriate power, i.e. any action that went further than the powers that are authorised under Part 2 of the Act, or a procedural requirement has not been complied with (these are terms cited within the Act). An application for leave to challenge must be made before the end of the period of six weeks beginning with the day after the relevant date, which for the purposes of the PfE Plan, begins on 22 March 2024 (the day after adoption of the plan comes into effect) and runs until 2 May 2024.
- 13.6 The High Court may make an interim order suspending the operation of the relevant development plan document or quash the plan wholly or in part. The purpose of this provision is to provide certainty as to the legal validity of the PfE Plan and to prevent later challenges.
- 13.7 The PfE Plan contains a monitoring framework with targets and indicators which will be used to monitor the achievement of the policies and reported on. Although the plan covers the period to 2039, in accordance with paragraph 33 of the National Planning Policy Framework (NPPF), the policies in local plans should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. The review process is a method to ensure that a plan and the policies within it remain effective. As explained in chapter 12 of the PfE Plan, the outcomes of PfE monitoring will form part of each PfE district's Local Plan Authority Monitoring Reports.

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 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 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>If the council adopts the PfE Plan, in accordance with section 113 of the Planning and Compulsory Purchase Act (2004), any person aggrieved by the adoption of the PfE Plan can challenge this by making an application to the High Court. An application for leave to challenge must be made before the end of the period of six weeks beginning with the day after the relevant date, which for the purposes of the PfE Plan, begins on 22 March 2024 (the day after adoption of the plan comes into effect) and runs until 2 May 2024.</p> <p>The High Court may make an interim order suspending the operation of the relevant</p>	<p>It is considered that 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.</p>

development plan document or quash the plan wholly or in part.	
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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 DPD 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. Following Submission, the Joint DPD was subject to independent examination, as prescribed by section 20 of the Act; the modifications consultation stage which took place between October and December 2023 fell within that stage of the plan preparation process. The Inspectors issued their report on 14 February 2024 which signalled the end of the examination stage. It is now the case that the nine districts now must either accept in full the recommendations in their report or reject them in full.

Financial Implications:

The preparation and examination of the Places for Everyone Plan 2021 generated a revenue cost for nine local authorities. A substantial evidence base was assembled to support the plan which involved the commissioning of specialist and independent experts. Following the submission of PfE to the Secretary of State, the independent examination began. Further revenue costs associated with the examination process included the appointment of Programme Officers, the cost of the examination itself, including the procurement of the venue, Planning Inspectors and legal advice/representation. Following adoption, further costs may be incurred in relation to the monitoring of the plan and also should the decision to adopt the Plan be legally challenged.

There are no current revenue implications.

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:

The following appendices can be viewed on the GMCA website at <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/adoption/adoption-documentation>.

- Appendix 1.1 - Inspectors' Report (Document 1 of 2).
- Appendix 1.2 - Inspectors' Report Appendix - Main Modifications to the Plan (Document 2 of 2).
- Appendix 2 – Schedule of Policies Map changes
- Appendix 3 – Consultation Report into the Additional Modifications incorporating the Schedule of Additional Modifications.
- Appendix 4 – Places for Everyone Plan for Adoption.
- Appendix 5 - Places for Everyone Policies Map.
- Appendix 6 – Correspondence between the Mayor of Greater Manchester and the Secretary of State.
- Appendix 7 – Schedule of policy number changes between the Submitted PfE Plan (SD1) and the PfE Plan being presented for adoption (Appendix 4).

Background papers/information:

[Report to AGMA Executive Board - December 2020](#)

[Report to AGMA Executive Board - February 2021](#)

[Report to Places for Everyone Joint Committee - July, 2021](#)

[District Governance Meetings - July 2021](#)

[Places for Everyone Submission Plan - Document SD1](#)

[Places For Everyone - Documentation](#)

[Places For Everyone Joint DPD Examination Website](#)

[District Governance Meetings - Sept/Oct 2023](#)

[Report of the Leader and Cabinet Member for Strategic Growth and Skills to Cabinet \(7 September 2022\) Places for Everyone – updated evidence on housing supply and request for a main modification to the plan.](#)

[Integrated Assessment reports including the Sustainability Appraisal](#)

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

Term	Meaning