

Report to:	EXECUTIVE CABINET
Date:	27 September 2023
Executive Member:	Cllr Jan Jackson - Executive Member Planning, Transport & Connectivity
Reporting Officer:	Julian Jackson - Director of Place
Subject:	PLACES FOR EVERYONE MODIFICATIONS CONSULTATION
Report Summary:	To update members on the progress of Places for Everyone Plan: A Joint Development Plan Document for 9 Greater Manchester Local Authorities (Places for Everyone Plan) and to seek approval to consult upon proposed modifications to the plan.
Recommendations:	<p>Executive Cabinet are recommended to:</p> <ul style="list-style-type: none"> i) Note progress made in respect of the Places for Everyone Plan; ii) Agree that the Places for Everyone modifications (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 the Places for Everyone Plan (section 12).
Corporate Plan:	Places for Everyone's vision is to support the achievement of the vision set out in the Greater Manchester Strategy and deliver sustainable inclusive growth across the nine boroughs. In doing so it seeks to make this one of the best places in the world to grow up, get on and grow old, strategically complementing and assisting in the delivery of the Council's Corporate Plan themes of starting well, living well and ageing well.
Policy Implications:	<p>Places for Everyone is a joint Development Plan Document for nine boroughs, which has been prepared in accordance with the legislative requirements set out in the Planning and Compulsory Purchase Act (2004) and the Town and Country Planning (Local Planning) (England) Regulations 2012. Upon adoption, Places for Everyone will provide a policy framework to guide investment and development decisions and be material in the determination of planning applications.</p> <p>Places for Everyone 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 Assessment, which includes Impact Assessments for both Equalities and Health and a Habitats Regulations Assessment, undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended).</p>
Financial Implications: (Authorised by the statutory Section 151 Officer)	The development of the joint Places for Everyone Plan, and subsequently Homes, Spaces, Places, is funded by a combination of revenue budget and monies earmarked in reserve as shown in the table below. This includes all costs associated with the

necessary consultation on the modifications to the Places for Everyone Plan.

	23/24	24/25	25/26	26/27	27/28	Total
	£m	£m	£m	£m	£m	£m
Held in Reserves						0.132
Revenue Budget	0.176	0.209	0.234	0.234	0.234	1.087
Total						1.219

This joint development plan provides a policy framework for individual Local Authority Plans and, as part of it, includes a commitment to develop new housing within the borough. The required growth in housing will have costs, in terms of infrastructure and service delivery, but will also generate additional revenues from Council Tax. The profile of growth in Council Tax will be dependent on delivery across the 15 years from adoption.

One of the modifications from the Inspectors is to change the period the Plan covers from 2020-2037 to 2022-2039. Whilst this doesn't result in a change to the annual average requirement for new homes, it does result in an increase over the duration of the plan from 7,758 to 8,245. This will have an impact on the costs to the Council associated with infrastructure and service delivery but it will also increase the revenues generated from Council Tax.

**Legal Implications:
(Authorised by the Borough
Solicitor)**

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 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.

Risk Management:

There are a number of risks associated with plan making activities and Places for Everyone, namely if the jointly prepared Development Plan Document is not taken forward 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), any subsequent attempt to adopt the plan may be susceptible to challenge.

Places for Everyone forms part of the borough's local plan, and by 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. Therefore minimising the risk of government intervention in plan making in Tameside or withholding of central funding.

Access to 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 - Documentation](#)

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

[Schedule of Proposed Main Modifications](#)

[Schedule of Proposed Additional Modifications](#)

[Composite Plan](#)

[Schedule of Proposed policies map changes](#)

[Integrated Assessment 2023 Addendum](#)

[Habitats Regulation Assessment 2023 Addendum](#)

Appendix 1. Tameside consultation activities

Background Information:

The background papers relating to this report can be inspected by contacting Graham Holland.



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1. INTRODUCTION

- 1.1 Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared, Greater Manchester's Plan for Jobs, Homes & the Environment (known as the "GMSF"). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process, however, decisions taken by Stockport Council in December 2020 signalled the end of the joint plan of the 10. Following that decision, 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".
- 1.2 At its meeting on the 20 July 2021, members of the Places for Everyone Joint Committee recommended the Places for Everyone 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 for representations.
- 1.3 The "publication" stage was a formal consultation on the draft joint development plan document pursuant to Regulation 19 of the above regulations. It was a statutory stage that provided an opportunity for organisations and individuals to submit their views on the content of the plan.
- 1.4 The "publication" stage consultation ran from August 9, 2021, for 8 weeks, ending on October 3, 2021. Over 15,000 representations were duly made, by over 3,800 individuals and organisations during that consultation stage.
- 1.5 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 February 14, 2022, pursuant to Regulation 22 of the Local Planning Regulations. This is called the "submission" stage and marked the beginning of the independent examination into the plan.

2. THE PLACES FOR EVERYONE EXAMINATION

- 2.1 The examination is the final stage in the plan making process before 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).
- 2.2 Some guidance about the examination 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 the examination. This enables the inspectors to adapt the procedures to deal with situations as they arise, so as to achieve positive outcomes in a range of different circumstances.
- 2.3 Following submission of a plan, the inspector(s) take control of the examination process from start to finish.
- 2.4 The inspectors' role is to examine whether the submitted plan meets the tests of soundness defined in the National Planning Policy Framework¹ and meets all the relevant legislative

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.

requirements, including the duty to co-operate². The Places for Everyone examination therefore concentrated on the issues that affect the plan's soundness and legal compliance and did not delve into other matters.

- 2.5 Three inspectors were appointed by the Planning Inspectorate (PINS) to hold an independent examination into Places for Everyone: 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.
- 2.6 The examination officially began at the point of "submission" (February 2022), however the hearing sessions did not start until the beginning of November 2022. In the early stages of the examination, the inspectors raised a number of Preliminary Questions (PQs) and Matters, Issues, and Questions (MIQs) that were prompted by their review of the plan. These probed issues of soundness and specific issues raised through consultation on the plan. The Places for Everyone authorities responded to the PQs and (together with other stakeholders) to the MIQs. In response to some of the MIQs, the Places for Everyone Team, proposed modifications to the Places for Everyone plan to address issues raised.
- 2.7 The examination hearings sat for 12 weeks in total, including a final session at the beginning of July 2023. The sessions before Christmas considered the spatial strategy and thematic policies and the sessions after Christmas focused on the strategic allocations, Green Belt additions and monitoring. 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 West; and JPA33 New Carrington) and related to land within strategic allocations that has also been identified on the Natural England map of deep peaty soils.
- 2.8 The Places for Everyone authorities were represented by Christopher Katkowski KC throughout, with staff from the GMCA, all nine authorities and Transport for Greater Manchester (TfGM) providing expert witnesses.
- 2.9 The examination hearing sessions took place at the former Manchester Fire and Rescue Training and Development Centre in Manchester City centre. It ran very smoothly, with the inspectors and participants alike commenting on how well organised it was. The livestreaming worked well and all the sessions remain available to view via the Combined Authority website.
- 2.10 In addition to the Preliminary Questions and Matters, Issues, and Questions, the inspectors issued 'Action Points' (APs) regularly throughout the duration of the sitting weeks. In these they asked the Places for Everyone authorities to prepare modifications to policies, which related to the detailed wording of the policies, and in respect of the allocations, involved clarification of how the allocation policies link to the thematic (sustainable, housing, greener etc.) policies in the plan. With the exception of two sites, one in Salford (JPA28 – North of Irlam Station) and one in Manchester, close to the Airport (JPA10 – Global Logistics), the inspectors did not recommend the removal of any allocations although, in a small number of cases, they did recommend the amendment of allocation boundaries. For Tameside, site allocation JPA32 South of Hyde, was one such allocation, whereby the site allocation boundary and area of Green Belt to be removed was reduced in size to be consistent with ecological designations present. This was to represent a consistent approach taken across a number of allocations.
- 2.11 Within their Action Points, the inspectors made it clear that the modifications are necessary at that stage of the examination to inform their consideration of whether the Plan is sound and/or how it could be made sound and/or legally compliant by main modifications. They

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.

also made it clear when they published their action points that they may decide that other or different main modifications are subsequently required as the examination advanced. Updates on each hearing week were provided to members throughout the examination through the Place Directorate weekly newsletter, where a summary of the week's activities, links to the examination website and where relevant, a look ahead to the following week were provided.

- 2.12 The Places for Everyone authorities submitted responses to the Action Points with modifications proposed to the policies where these were considered necessary to make the plan sound. The responses to the individual PQs, MIQs and APs are available on the examination website³. As requested by the inspectors, all the proposed main modifications were compiled into a main modifications schedule which was first published in July 2022 with subsequent editions being published in October and November 2022 and January, May, June and August 2023. Since November 2022 iterations of a composite plan have also been published on the Examination website, alongside the proposed main modifications' schedules, to aid the reader by identifying the proposed modifications in-situ within the plan.

3. PLACES FOR EVERYONE PROPOSED MODIFICATIONS

- 3.1 It is very normal for the outcome of a local plan examination to be that the inspectors recommend main modifications to the plan, where they are necessary to make the plan sound and legally compliant.
- 3.2 As a matter of law a main modification can only be made if it is necessary in order to make the plan sound. The tests which are applied to determine whether a plan is sound are those set out in the National Planning Policy Framework (NPPF). Therefore, legislation enables the inspector to recommend a main modification only if the plan would otherwise not be sound or legally non-compliant. An inspector has no power to recommend other changes, even if they would improve the plan.
- 3.3 An inspector agrees the text of the proposed main modification with the local planning authority, based in most cases on discussion at the hearing sessions. This was done through the process of Action Points outlined above and it was the responses to these, the various iterations of the proposed main modification schedules and composite plan which informed the Inspectors' consideration of whether the Places for Everyone 2021 Plan was sound and/or how it could be made sound and/or legally compliant by main modifications.
- 3.4 The Inspectors' post hearing letter was published on the examination website on the 11 August 2023. The Inspectors' post hearings' letter is based on a consideration of all the evidence and on the application of professional expertise and judgment. In that letter, the inspectors state that they are now 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 public consultation to be carried out on the main modifications and which are the subject of this report.
- 3.5 Additional modifications (sometimes also referred to as minor modifications) are changes which do not materially affect the policies in the plan. They may be made to the Places for Everyone Plan, but do not fall within the scope of the examination. A separate schedule of additional modifications has been prepared which will sit alongside the main modifications schedule during the consultation period. These have been prepared at this point in time to make the modified plan more readable, but the inspectors will not consider responses made in respect of these additional modifications, as they do not fall within the scope of the examination.

³ <https://www.hwa.uk.com/projects/gmca/>

- 3.6 Whilst the consultation is only about the proposed main modifications and the policy map changes associated with these main modifications, a schedule of additional modifications and a composite plan illustrating all the proposed modifications in situ have been prepared and are available alongside this report. All documents will be made available at the time of the consultation to assist the reader, but only representations on the main modifications are considered by the inspectors.
- 3.7 The following sections of this report set out what the main modifications mean in terms of the overall aims of the plan and also for Tameside specifically.

4. WHAT DO THE MODIFICATIONS MEAN FOR THE OVERALL AIMS OF THE PLAN

- 4.1 Whilst there are a large number of proposed modifications, including amending the plan period from 2020 to 2037 to 2022 to 2039, they do not change the overall Vision, Objectives and Spatial Strategy of the plan. The inspectors consider that the proposed modification to the plan period are necessary to make the plan sound to ensure that, in line with the National Planning Policy Framework⁴, the Places for Everyone Strategic policies look ahead over a minimum 15 year period from adoption and as a result provide a policy framework for the individual, more detailed plans of each authority, which will follow on from Places for Everyone's adoption.

Spatial Strategy

- 4.2 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, including JPA30 Ashton Moss West, supporting infrastructure and a commitment that collectively the northern districts meet their own local housing need, including through JPA31 Godley Green Garden Village and JPA32 South of Hyde; and
- 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

- 4.3 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 existing and creating new employment locations, so that all communities are able to contribute to, and benefit from, growth.
- 4.4 In order to achieve Greater Manchester's economic growth potential, the plan sets a global target for the nine authorities of just over 2 million sq.m. of new office floorspace and just over 3,500,000 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 in Tameside of Homes, Spaces, Places.

⁴ Paragraph 22.

- 4.5 JPA30 Ashton Moss West continues to be identified in Tameside for 160,000 square metres of employment floorspace, within the E(g)(ii) - Research and Development, E(g)(iii) – Light Industrial and B2 - General Industrial use classes. Following the hearing session discussion regarding Ashton Moss West, the inspectors issued an Action Point note which required a number of modifications to the policy, including removing the word “primarily”, (which preceded the above mentioned use classes) so as to remove any ambiguity as to what is considered appropriate. There were also a number of other modifications made to the policy, an approach taken by the inspectors to ensure consistency in wording across all of the site allocation policies and also to ensure the plan is read as a whole. These modifications do not substantively change the overall objective of proposed allocation policy. Further, reference is also now explicitly made within the policy concerning peat underlying the site and ensuring that appropriate consideration is given to this through construction techniques.

Homes

- 4.6 Greater Manchester is facing a housing crisis. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To address the supply side, 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.
- 4.7 This standard methodology remains Government policy and the inspectors did not consider there were exceptional circumstances to deviate from using it in the case of Places for Everyone.
- 4.8 Therefore, Places for Everyone still identifies that around 10,300 (10,305) homes are required per year. However, as a result of the change to the plan period, the number of homes to be delivered over the lifetime of the plan has increased from just under 165,000 to just over 175,000 (175,185) new homes, to account for the additional years the plan covers. The plan also continues to support Greater Manchester’s commitment to deliver more affordable housing including ones for social or affordable rent, and Homes, Spaces, Places will set targets within Tameside for the provision of affordable housing based on local evidence relating to need and viability.
- 4.9 For Tameside, Places for Everyone still identifies the same annual average requirement of 485 homes per year, even with the extension to the plan period. However, as a result of the change to the plan period, the number of homes to be delivered over the lifetime of the plan in Tameside has increased from 7,758 to 8,245 accordingly. To deliver on these requirements, JPA31 Godley Green Garden Village and JPA32 South of Hyde, continue to be proposed as allocations for the same quantum of around 2,350 and 440 homes respectively.
- 4.10 Similarly to JPA30 Ashton Moss West, following the hearing session discussions regarding JPA31 Godley Green Garden Village and JPA32 South of Hyde, the inspectors issued an Action Point note which required a number of modifications to the policies, principally to ensure consistency in wording across all of the site allocation policies but also to ensure the plan is read as a whole. These modifications do not substantively change the overall objective of proposed allocation policies.

Environment

- 4.11 However, 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 variety of different ways and afforded value by the people who live, work or visit the city-region.
- 4.12 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.

4.13 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

4.14 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.

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

- Offices - 98%
- Industry and Warehousing- 51%
- Housing - 90%

4.16 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 these viability issues, but it is not enough to enable the full potential of our brownfield land supply to be realised.

Green Belt

4.17 The Places for Everyone Plan includes a limited release of Green Belt for both housing and employment. The net loss of Green Belt across the nine boroughs is 2,213 hectares. This compares to a net loss of 1,754 hectares in the Places for Everyone 2021 Plan that was submitted for examination. The net loss of Green Belt proposed in the plan as modified for Tameside is 179 hectares. This compares to a net loss of 139 hectares in the Places for Everyone 2021 plan that was submitted for examination.

4.18 Although the net loss is higher than that in the Places for Everyone 2021 Plan, this is not as a result of more land being proposed for release by the introduction of further development allocations. To the contrary, the number of sites proposed to be allocated within the plan for development has reduced by two and others have also seen the extent of boundaries reduced. Instead, it is due largely to the fact that the inspectors concluded that exceptional circumstances⁵ existed to justify only 18 of the 49 proposed Green Belt additions and therefore only those 18 Green Belt additions could remain in the plan and thereby contribute to the area covered by Green Belt.

4.19 In concluding that exceptional circumstances had not been fully evidenced and justified for each of the other 31 proposed Green Belt additions, including one which is almost 200 hectares in size, the overall net let loss of Green Belt, taking account of both the Green Belt releases and additions, compared against the previously adopted Green Belt boundary is greater than it would have otherwise been had the inspectors concluded that all 49 Green Belt additions were fully evidenced and justified.

⁵ Including the test for adding new land to the Green Belt as set out within paragraph 139 of the National Planning Policy Framework.

- 4.20 Twelve of the original 49 proposed Green Belt additions are within Tameside. The inspectors concluded that for 7 sites, exceptional circumstances exist to justify them as proposed additions to the Green Belt. Those 7 sites are:
- GBA31 Fox Platt, Mossley;
 - GBA32 Manor Farm Close, Waterloo, Ashton-under-Lyne;
 - GBA35 Woodview, Southview, Carrbrook, Stalybridge;
 - GBA37 Broadbottom Road, Broadbottom;
 - GBA39 Cemetery Road, Denton;
 - GBA40 Hyde Road, Mottram; and
 - GBA41 Ashworth Lane, Mottram.
- 4.21 For the avoidance of doubt, the 5 sites where the inspectors concluded that exceptional circumstances do not exist and are to be removed from the plan are:
- GBA33 Ridge Hill Lane, Ridge Hill, Stalybridge
 - GBA34 Cowbury Green, Long Row, Carbrook, Stalybridge
 - GBA36 Yew Tree Lane, Dukinfield
 - GBA38 Ardenfield, Haughton Green, Denton
 - GBA42 Horses Field, Danebank, Denton
- 4.22 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. Further, the reasons that some of the proposed Green Belt additions did not meet the necessary tests, included in some cases, that existing planning policies and protections, were considered already adequate to protect land from development.
- 4.23 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 the Places for Everyone Plan would reduce this to just under 45% of the Places for Everyone authorities remaining as designated Green Belt. Within Tameside the policies in the plan would result in the overall extent of Tameside's Green Belt reducing by 3.5%. The previously adopted Green Belt covers just over 49% of Tameside. The policies in the plan would reduce this to 47.4% remaining as designated Green Belt.
- 4.24 The extent of Green Belt loss within Tameside as a result of the plan has always been less than the plan average, which is a consistent position, owing largely to the inspectors' conclusions that exceptional circumstances existed on almost 60%⁶ of the boroughs proposed Green Belt additions, the second highest of any borough proposing additions, in addition to which, the area of Green Belt lost at the JPA32 South of Hyde allocation has also reduced during the course of the examination.

5. RELATIONSHIP WITH TAMESIDES' LOCAL PLAN AND HOMES, SPACES, PLACES

- 5.1 The Places for Everyone Plan 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 Places for Everyone is adopted it will form part of Tameside's Local Plan. As such other parts of Tameside's local plan, including Homes, Spaces, Places, as this is developed, will need to be consistent with it. In addition, neighbourhood plans will also need to be in general conformity with the strategic policies within it.
- 5.2 The evidence that underpins Places for Everyone Plan will also help to inform Homes, Spaces, Places, as this is developed, but, as a strategic plan, Places for Everyone does not

⁶ By number of sites.

cover everything that a single local plan would do. Tameside's Local Plan is a sum of its parts. Therefore, Homes, Spaces, Places, will set out more detailed policies, including both strategic and non-strategic policies, as appropriate, reflecting local circumstances. This, alongside the Greater Manchester Minerals Plan, the Greater Manchester Waste Plan and Places for Everyone are collectively intended to be the boroughs' local plan. Appendix A of Places for Everyone sets out the policies in other relevant adopted plans which will be replaced.

- 5.3 Homes, Spaces, Places, as with any 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, Places for Everyone Plan should provide an appropriate strategic policy framework for subsequently prepared plans for Tameside, following its adoption. However, in the event that Homes, Spaces, Places, looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JP-J4 and JP-H1 should be used to inform target(s).

6. INTEGRATED ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT

- 6.1 As part of the development of Places for Everyone, an Integrated Assessment (IA) was undertaken incorporating the requirements of:
- Sustainability Appraisal (SA): mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
 - Strategic Environmental Assessment (SEA): mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
 - Equality Impact Assessment (EqIA): required to be undertaken for plans, policies and strategies by the Equality Act 2010.
 - Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 6.2 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.
- 6.3 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.
- 6.4 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.
- 6.5 Places for Everyone 2021 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 a Habitat Regulation Assessment with mitigation measures identified as appropriate. Through the examination process a need has been identified to provide further planning guidance as to how potential impacts upon the South Pennine Moors Special Area of Conservation may be mitigated. A Supplementary Planning Document will be prepared by the boroughs of Rochdale, Oldham and Tameside to provide further guidance to relevant applications for planning permission.

- 6.6 Further, the inspectors have made it clear that the modifications they have decided should be made to the plan should also be subject to sustainability appraisal and Habitat Regulations Assessment as appropriate. Additionally, the Inspectors have made it clear that the sustainability appraisal and Habitat Regulation Assessment reports will be subject to public consultation, alongside the modifications, before the end of the examination.
- 6.7 Accordingly, addendums have been produced for both the IA (incorporating the sustainability appraisal) and the HRA, assessing the impact of the modifications.
- 6.8 With respect to the sustainability appraisal, where individual policy scores have moved from positive to uncertain or neutral, the SA 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 recommended.
- 6.9 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 Habitat Regulation Assessment. Therefore, it has not been necessary to amend the Places for Everyone Appropriate Assessment as a result of the proposed main modifications.
- 6.10 The Integrated Assessment and the Habitat Regulations Assessment addendum reports are available alongside this report and will be published alongside the main modifications schedule.

7. EVIDENCE BASE

- 7.1 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 Greater Manchester Combined Authority's website since then and throughout the examination. As one of the tests of soundness is whether a plan is "justified – ...based on proportionate evidence", the Inspectors considered this evidence as part of their Examination into whether, or not, Places for Everyone is "sound".
- 7.2 As detailed above, this evidence base will also be used to inform other parts of Tameside's local plan as these are developed, such as Homes, Spaces, Places, alongside other supporting evidence prepared as necessary.

8. STATUS OF PROPOSED NATIONAL PLANNING POLICY FRAMEWORK CHANGES

- 8.1 In December 2022 the Government consulted upon a number of 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 National Planning Policy Framework 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.
- 8.2 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.
- 8.3 The Government is still analysing the feedback, therefore the draft (as proposed to be changed) version of the National Planning Policy Framework 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 Places for Everyone, on the basis of the draft proposed changes to the National Planning Policy Framework. This is especially the case given that Places for Everyone is at such an advanced stage of preparation.

- 8.4 As 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.
- 8.5 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 National Planning Policy Framework. 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.

9. PREVIOUS CONSULTATION

- 9.1 Five consultations have taken place in relation to the plan, the first four in relation to the Greater Manchester Spatial Framework and the fifth one being in relation to Places for Everyone. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016. The fourth consultation was on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) and took place in 2019. It received over 17,000 responses. The responses received informed the production of the Greater Manchester Spatial Framework 2020. The withdrawal of Stockport Council in December 2020 prevented the Greater Manchester Spatial Framework 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare Places for Everyone 2021. Therefore, the responses to the Greater Manchester Spatial Framework 2019 were used to inform the production of Places for Everyone instead. The fifth consultation ran from August 9, 2021, for 8 weeks, ending on October 3, 2021. It related to publication of the plan and over 15,000 representations were duly made, by over 3,800 individuals and organisations.

10. PLACES FOR EVERYONE MODIFICATIONS CONSULTATION

- 10.1 At this modifications consultation stage, whilst anyone can make a representation, the Planning Inspectorate Procedure Guide for Local Plan Examinations⁷ makes it clear (at section 6) that the consultation is only about the proposed main modifications and any consequential policies map changes and no other aspect of the plan.
- 10.2 Whilst it is only necessary to consult on the main modifications and any related policy map changes, it is proposed to also consult on the additional modifications that have been identified too, so that the full suite of overall proposed changes to the plan are clear. The inspectors will, however, only consider comments received to the main modifications; the nine Places for Everyone authorities will consider those comments relating specifically to the additional modifications.

⁷ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>

- 10.3 As at the Regulation 19 stage, this consultation will be hosted by the GMCA and be carried out in line with the requirements of the relevant authority's Statements of Community Involvement and the guidance contained in the above mentioned Planning Inspectorate procedure guide. 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. This means it should last at least six weeks." However, as the Regulation 19 consultation ran for eight weeks, it is considered appropriate to reflect that in the duration of the modifications' consultation. Therefore, it is proposed that the consultation would run for a period of eight weeks. Consideration of which consultation activities undertaken in Tameside at the regulation 19 stage and which continue to be appropriate for this modifications consultation are set out in Appendix 1.

11. WEIGHT BEING GIVEN TO PFE IN PLANNING DECISIONS

- 11.1 Places for Everyone is a material consideration and therefore is already being taken into account when considering applications for planning permission.
- 11.2 Given it is a material consideration, the next point for consideration is the weight to be attributed to it in making such decisions. Paragraph 48 of the National Planning Policy Framework sets out what needs to be taken into account when considering the weight to give to emerging plans. In all cases, this is ultimately a judgement for the decision maker, considering the specific circumstances of an application for planning permission. A judgement is therefore made on a case by case basis.
- 11.3 Whatever weight is attributed to the plan always needs to be reasonable and in line with national policy. As it is not yet adopted, Places for Everyone cannot be given full weight in planning decisions. However, given the stage it has reached, i.e., the receipt of the post hearings' inspectors' letter, it is considered reasonable to give elements of the plan substantial weight, subject to the inspectors consideration of responses to the proposed modifications consultation on the final content of the plan.
- 11.4 As the inspector's letter gives a clear steer as to the wording required to make the plan sound, the weight is applied to the text of the plan as proposed to be modified in the main modifications (not the Regulation 19 version of Places for Everyone).

12. NEXT STEPS

- 12.1 Following the conclusion of the consultation, 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.
- 12.2 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.
- 12.3 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. 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.

- 12.4 Alternatively, if the inspectors consider that no further consultation is necessary following the modifications' consultation (which is the subject of this report), the ultimate decision to adopt must be taken by each of the nine participating local authorities. This will be the subject of a further report at the appropriate time.

13. RECOMMENDATIONS

- 13.1 As set out at the front of the report.