

Report to: COUNCIL

Date: 20 July 2021

Executive Member: Cllr Gerald Cooney – Executive Member (Housing, Planning and Employment)

Reporting Officer: Jayne Traverse – Director of Growth

Subject: **PLACES FOR EVERYONE PUBLICATION PLAN 2021: A JOINT DEVELOPMENT PLAN DOCUMENT FOR 9 GREATER MANCHESTER LOCAL AUTHORITIES (BOLTON, BURY, MANCHESTER, OLDHAM, ROCHDALE, SALFORD, TAMESIDE, TRAFFORD AND WIGAN)**

Report Summary: This report seeks approval to publish the Places for Everyone (PfE) Publication Plan 2021, including supporting background documents, for a period of public consultation in accordance with planning regulations.

The report also recommends that Full Council approve the submission of PfE to the Secretary of State following the period of public consultation.

It also recommends publishing an updated Local Development Scheme (LDS) to reflect a revised Local and joint plan-making timetable given the transition from GMSF to PfE.

Recommendations: It is recommended that Executive Cabinet note that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020) and :

- (i) Approve Publication of the Places for Everyone Publication Plan 2021, including strategic site allocations and green belt boundary amendments, and reference to the potential use of compulsory purchase powers to assist with site assembly, and the supporting background documents, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for a period for representations of 8 weeks, commencing no earlier than 9 August 2021.
- (ii) Authorise the Director of Growth, in consultation with the Executive Member (Housing, Planning and Employment), to approve relevant Statement of Common Ground(s) required on this and other planning matters, pursuant to the National Planning Policy Framework 2019;
- (iii) Agrees the updated timetable for the production of the Places for Everyone Publication Plan 2021, as presented to and agreed by the Joint committee, and Tameside Local Plan by publishing and bringing into effect in accordance with the date of this decision the updated Local Development Scheme (LDS) as at Appendix 1.

It is recommended that Full Council:

- (iv) Approve Submission of the Places for Everyone Publication Plan 2021 to the Secretary of State for examination following the period for representations.

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:

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, PfE will provide a policy framework to guide investment and development decisions and be material in the determination of planning applications.

PfE 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).

An updated LDS is required to ensure the plan is brought forward in accordance with the timetable presented, as required by Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended).

The approval of any plans or documents identified within the LDS will remain, at the appropriate time, decisions for Executive Cabinet and in some instances, Full Council.

**Financial Implications:
(Authorised by the statutory
Section 151 Officer & Chief
Finance Officer)**

There are no financial implications arising from the report at this stage. The related impact on the Council's financial resource base will be reported to Members at a later date following the period of representations as stated in the recommendations.

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

Members will recall considering the publication and consultation on the Greater Manchester Spatial Framework in November 2020, which has now been superseded by the Joint Places for Everyone Publication Plan 2021. It is intended that the resolutions being sought in this report will replace those recommendations made in November 2020.

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 will be 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 submission to the Secretary of State, the joint DPD must be published and

representations invited, pursuant to Regulation 19 and Regulation 20 of the 2012 Regulations. Failing to prepare the joint DPD in accordance with the 2004 Act and the 2012 Regulations, would mean any subsequent attempt to adopt the plan would be susceptible to challenge. Formal consultation on the proposal is due to take place between dates agreed at the meeting of the newly established Joint Committee.

The Council consulted on a revised draft Statement of Community Involvement (SCI) for which consultation expired on 1 October 2020 and approved a technical update, 23 June 2021. This is the document which sets out how the Council will consult people when it prepares planning documents and determines planning applications. Consultation on earlier drafts of the GMSF generated significant interest and comments received are detailed within a Statement of Consultation which accompanies and has informed the Places for Everyone 2021 documentation.

The Equalities Impact Assessment which accompanies the SCI has identified concerns about an over reliance on internet communication to consult with the public. Without or the reduced use of traditional physical engagement methods, such as, pamphlets, letter drops, door canvassing, information in public buildings and workshops in communities; due to COVID19 restrictions, could lead to certain groups becoming disenfranchised. For example older people and people on lower incomes may be less likely to take part in the consultation. Section 3.4 of the report sets out some potential steps to mitigate these concerns in respect of the Places for Everyone consultation.

The Council's ability to comply with its Equalities Duties and carry out a meaningful consultation on the Places for Everyone will need to be kept under review, in light of possible changes to local COVID restrictions during the consultation period. The Places for Everyone Publication Plan will be subject to examination in public.

Therefore relevant governance and consultation processes will and should be subject to greater legal scrutiny; including any proposed delegations.

Risk Management:

There are a number of risks associated with plan making activities and Places for Everyone, alongside failure to publish an up to date LDS. Namely:

- (i) 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.
- (ii) If the LDS is not updated, communities and interested parties (including the Planning Inspectorate) may not be aware of, or be able to keep track of progress of plan making activities and the Council may fail to comply with the requirements of Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended).

Access to Information:

Places for Everyone will be issued for public consultation and accessible via a range of consultation methods including being

made available via the Council and on Combined Authority websites.

<https://www.greatermanchester-ca.gov.uk/placesforeveryone>

The above website will be updated following nine districts approval processes and the consultation portal (<https://www.gmconsult.org/>) will become live at the start of the formal consultation.

The updated LDS is available at Appendix 1

Background Information:

Places for Everyone and other relevant background papers can be accessed via the links below:

<https://www.greatermanchester-ca.gov.uk/placesforeveryone>

<https://democracy.greatermanchester-ca.gov.uk/mgCommitteeDetails.aspx?ID=412>

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



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1. INTRODUCTION

- 1.1 In 2014, following AGMA Executive Board recommendation¹, Tameside Council resolved to work collaboratively with the other Boroughs of Greater Manchester and the Combined Authority on the production of Greater Manchester's Plan for Homes, Jobs, and the Environment, also known as the Greater Manchester Spatial Framework (GMSF). The GMSF was a Development Plan Document that had been prepared together by the Greater Manchester Combined Authority, comprising of the Mayor of Greater Manchester and the leaders of all ten of Greater Manchester's local councils.
- 1.2 Up until December 2020, the GMSF had been prepared as a Joint Development Plan Document of the ten Greater Manchester local authorities. And on the 30 October 2020, the AGMA Executive Board² agreed to recommend the GMSF 2020 to be approved for consultation and submission. At Executive Cabinet³ (2 November 2020) and Full Council Meetings⁴ (3 November 2020), Tameside resolved to approve that plan, for publication and onward submission to the Secretary of State. The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process, however, Stockport Council subsequently resolved not to submit the GMSF 2020 following the consultation period and not to publish it for public for consultation. The decisions of Stockport's Cabinet (4 December 2020) and Council (3 December 2020) therefore signalled the end of the GMSF as a plan for the 10 authorities.
- 1.3 However, S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint Development Plan Document (DPD). Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has "substantially the same effect" on the remaining authorities as the original joint plan.
- 1.4 Consequently, on the 11 December 2020, a report was considered by AGMA Executive Board⁵ and agreement reached in principal to the preparation of a joint plan of the remaining nine boroughs (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). Following that meeting, officers were asked to consider the impact of the withdrawal of Stockport and the extent to which the joint Places for Everyone (PfE) plan could take advantage of the provisions set out in paragraph 1.3 above. And proceed to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the publication stage, rather than have to go back to an earlier (Regulation 18) informal stage of consultation.
- 1.5 The 'Publication stage' is a formal consultation on the draft joint DPD undertaken in accordance with regulation 19 of the Local Planning Regulations. It is a statutory stage that provides an opportunity for organisations and individuals to submit their final views on the content of the plan.
- 1.6 On the 12 February 2021, a report was considered by AGMA Executive Board⁶ and agreement reached that each of the of the nine Councils take forward recommendations through their relevant processes, to approve the making of an agreement with the other eight Councils to prepare a Joint DPD, PfE. Boroughs were also asked to agree the membership of a new joint committee and delegate authority to that committee to prepare the plan. At

¹ <https://democracy.greatermanchester-ca.gov.uk/CeListDocuments.aspx?Committeeld=365&MeetingId=2277&DF=28%2f11%2f2014&Ver=2>

² <https://democracy.greatermanchester-ca.gov.uk/ieListDocuments.aspx?CId=383&MId=4187>

³ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=134&MId=5052&Ver=4>

⁴ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=160&MId=5269&Ver=4>

⁵ <https://democracy.greatermanchester-ca.gov.uk/ieListDocuments.aspx?CId=383&MId=4221>

⁶ <https://democracy.greatermanchester-ca.gov.uk/ieListDocuments.aspx?CId=383&MId=4332>

Council⁷ (23 February 2021) and Executive Cabinet⁸ (24 March 2021) Tameside agreed those recommendations.

- 1.7 PfE is clearly key for Tameside and the other eight boroughs in creating the foundations for the scale of growth and ambition envisaged. It will be part of the Council's Development Plan and alongside the strategic sites will provide a framework of policies to be used in the day-to-day determination of planning applications, but it remains a high-level strategic plan and does not cover everything. Local plans and Supplementary Planning Documents will continue to be important to take forward the strategic policies and priorities of PfE and interpret these at a more detailed local level, sustaining areas of local distinctiveness and quality in Tameside.

2. PREVIOUS CONSULTATION AND PROCEDURES

- 2.1 Four consultations took place in relation to the GMSF, which have in turn informed the preparation of PfE. 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 and fourth in 2016 and 2019 on draft versions of the plan.
- 2.2 The first draft of the GMSF was published for consultation on 31 October 2016, ending on 16 January 2017 and generated significant interest with over 27,000 responses received. Consultation on the last version of the plan, the 2019 revised Draft GMSF, took place between 21 January and 18 March 2019 and over 17,000 responses were received.
- 2.3 Since the fourth and most recent consultation on the GMSF, further work was undertaken to analyse the responses, develop and refine the evidence base and prepare a further version of the plan which was the GMSF Publication Draft 2020 (GMSF 2020), as previously presented and approved by Executive Cabinet⁹ (2 November) and Council Meetings¹⁰ (3 November). However, the withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead, work was undertaken to prepare PfE 2021.
- 2.4 As provisions exist that where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed, as presented to the Joint Committee (20 July 2021), to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012 rather than take a backward step to an earlier consultation stage.
- 2.5 A Statement of Consultation accompanies the PfE 2021 to enable people to see how their comments, in relation to the previous GMSF consultations have been considered and how the plan has been changed as a result, or why in some instances comments have not resulted in changes. This next consultation is the 'Publication' stage for the jointly prepared PfE 2021 and its background information. It is undertaken in accordance with the relevant national regulations (in this case, regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
- 2.6 The publication plan is the version that the nine boroughs consider sound. At this stage, whilst anyone can make a representation on any matter, only those relating to 'soundness'

⁷ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=160&MId=6914&Ver=4>

⁸ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=134&MId=5057&Ver=4>

⁹ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=134&MId=5052&Ver=4>

¹⁰ <https://tameside.moderngov.co.uk/ieListDocuments.aspx?CId=160&MId=5269&Ver=4>

will be taken into account by the Inspector(s). The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. As set out in paragraph 35 of the National Planning Policy Framework, plans are sound if they are;

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs 19 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

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

2.8 On completion of the proposed PfE Publication in late 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. This is known as the ‘Submission’ stage, undertaken in accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Whilst anyone can make a representation on any matter, as set out above, it is important to note that only those relating to the four tests of soundness will be taken into account by the Inspector(s). If major new issues arise at the Publication stage there would likely need to be further consultation prior to any submission of the plan.

2.9 An Examination in Public then takes place, at which a Planning Inspector(s) will consider the joint DPD and representations made in respect of it and determine whether the DPD is capable of being adopted, either with or without amendments. Assuming that the document is capable of adoption, whether with or without amendments, the ultimate decision to adopt must be taken by each of the Full Councils of the 9 participating local authorities.

3. CONSULTATION

3.1 The consultation will be carried out in line with the requirements of each district’s Statement of Community Involvement, the document which sets out how the Council will consult people when it prepares planning documents and determines planning applications. The challenges posed by the coronavirus pandemic have been significant over the past 12-18 months and government guidance continues to have implications for how the public can and should be engaged.

3.2 This will be no different through this next consultation phase. However, the government has also been clear that the challenge presented by the virus is not a sufficient reason to delay plan preparation. Therefore, a range of activities and reasonable steps have been considered to ensure a broad spectrum of the community are engaged through publishing the plan and the achievement of a consultation in a safe and broadly consistent way across the nine boroughs.

3.3 Government also issued emergency legislation¹¹, originally due to expire 31 December 2020 but extended to 31 December 2021, to remove the need for hard copies of plans to be

¹¹ Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020

available in locations such as town halls or libraries and advised local authorities to review their Statement of Community Involvement to ensure that consultation can take place in a COVID-compliant way. To reflect this advice, the Council revisited its Statement of Community Involvement and following a period of consultation adopted a revised Statement in November 2020. More recently, the Statement has received a further minor update to reflect the change in plan making narrative from GMSF to PfE (approved 23 June 2021).

3.4 Effective community engagement must be promoted by methods which are reasonably practicable and government guidance strongly encourages the use of online engagement methods. Engagement strategies continue to be developed for the PfE 2021 consultation, which will consider the use of virtual exhibitions, digital consultation tools, social media and other online resources. However, reasonable steps also need to be taken to ensure that sections of the community that don't have internet access are involved and therefore alternatives are also being considered. This could include:

- Engaging sections of the community that do not have internet access through representative groups via the Council's Partnership Engagement Network;
- Providing telephone information lines or a call back facility;
- Placing of site notices adjacent to both allocations for development and sites for further protection;
- Provision of socially distanced drop in information sessions;
- Provision of display material prominently in public locations; and
- Provision of hard copy or take away material within libraries.

3.5 It is important to note while news continues to be changeable regarding the prevalence of the virus within the borough and across Greater Manchester, there continues to be the potential for uncertainty around the type of restrictions which may or may not be in place at the time of the consultation. Scenarios therefore continue to be developed jointly with the Council's Policy and Communications teams to respond to the different levels of social distancing and public interaction which may be possible at the time of any future consultation.

4. DIFFERENCES BETWEEN PLACES FOR EVERYONE 2021 AND GMSF 2020

4.1 The text of the GMSF 2020 has been revised following the withdrawal of Stockport. The Places for Everyone Publication Plan 2021 (PfE 2021) is available via the web link at the front of this report. The revisions to PfE 2021 (as compared to GMSF 2020 and reported to the Joint Committee 20 July 2021) fall into 5 broad categories:

(i) As a direct result of the withdrawal of Stockport Council from GMSF

Policies relating specifically to Stockport Council's area have been removed (e.g. strategic allocations). Housing and employment land requirements and supply have been recalculated to reflect the withdrawal of Stockport Council, the change in the Plan period and the outcome of Duty to Co-operate discussions with Stockport to date, as has the extent of the proposed release of Green Belt in the remaining nine districts. The plan period has been updated from 2020-2037 to 2021-2037; and references to 'Stockport' 'Greater Manchester', 'Greater Manchester Spatial Framework' and 'GMSF' have been deleted and/or replaced where appropriate.

Information presented in the Plan relates to the nine participating boroughs where appropriate and possible to do so. In some instances (such as air quality), information cannot be disaggregated from the Greater Manchester level, or it is not appropriate to do so as it is referring to the wider Greater Manchester area, including Stockport. In these instances it is legitimate to present the information for Greater Manchester.

(ii) As a direct result of changes to government policy since October 2020

Government published the revised methodology for calculating Local Housing Need (LHN) on 16 December 2020. The methodology for all of the Greater Manchester Authorities other than Manchester City Council was largely unchanged, however the new methodology resulted in a 35% uplift for the Manchester City Council area. The revised LHN methodology states that the 35% uplift is to be met within the district and not redistributed. As PfE 2021 has not been through the Publication Stage it is not subject to transitional arrangements and is required to take into account the standard methodology for calculating Local Housing Need published by Government on 16 December 2020. This resulted in the Manchester LHN increasing by 914 homes per annum or almost 15,000 homes over the plan period which has been reflected in Manchester City Council's housing land target in PfE 2021.

(iii) As a direct result of new evidence/information being made available since October 2020

The evidence base underpinning the Places for Everyone Publication Plan 2021 builds on that compiled for GMSF 2020. Addenda have been produced where appropriate to outline the additional work which has been undertaken to take account of the changes between GMSF 2020 and Places for Everyone Publication Plan 2021 and the passage of time.

(iv) Clarification of policy wording

This category includes minor changes to a limited number of policies as a result of ongoing collaboration with statutory consultees, and to provide more clarity regarding implementation.

(v) Minor typographical changes

This category relates to the correction of spelling and grammatical errors only.

5. ASSESSMENT OF THE PROPOSED CHANGES

5.1 The revisions set out above have been reviewed in order to consider their impact on the effect of the PfE 2021 on the remaining nine authorities, compared to the GMSF 2020. The assessment of the effect of the changes as reported to the Joint Committee (20 July 2021) are set out below:

(i) As a direct result of the withdrawal of Stockport Council from GMSF

The effect on the remaining nine districts of the removal of the Stockport allocations and associated references is minimal.

The withdrawal of the Stockport allocations did not result in the need for the remaining nine districts to amend the distribution of their objectively assessed housing and employment needs. Therefore the spatial strategy for the remaining nine districts will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The withdrawal of Stockport in December delayed publication of the plan under Regulation 19. The PfE Plan period has therefore been revised to 2021 to 2037, from 2020 to 2037 (that of GMSF 2020). As a result, the overall (and individual) housing and employment land targets have been amended and the ability of the land supply to meet these revised targets has consequently altered. Whilst a small number of changes have been made to allocations in Oldham and Salford, as a result of this, the resultant spatial strategy will have substantially the same effect as the GMSF 2020 would have had on the nine remaining districts.

The proposed Green Belt release in PfE 2021 equates to 1,754 hectares, equating to 3.3% of the current Green Belt covering the 9 districts. GMSF 2020 proposed Green

Belt release of 1,940 hectares, which equated to a 3.3% reduction in the extent of the Greater Manchester (all 10 districts) Green Belt.

In light of the above, it is considered that the revisions which fall into this category (as a direct result of the withdrawal of Stockport) would result in a plan which has substantially the same effect on the participating nine districts as GMSF 2020.

(ii) As a direct result of changes to government policy since October 2020

A higher annualised plan figure for Manchester City than in the GMSF 2020 (2,951 vs 3,527) has been introduced within PfE 2021 as a result of the revised LHN. Through this process Manchester City Council has identified sufficient land in the urban area to meet its increased need and consequently remove a very small Green Belt housing site. This remains consistent with the GMSF 2020 spatial strategy which concentrated growth in the centre of the conurbation. Manchester City's increased LHN, and therefore its PfE 2021 housing target, helps to maintain a consistent spatial strategy, between the two plans, despite Stockport's withdrawal. And results in a Plan with substantially the same effect as the GMSF 2020 on the nine districts.

(iii) As a direct result of new evidence/information being made available since October 2020

The types of changes outlined above, which fall into this category have arisen out of the need to maintain an up to date evidence base, despite the passage of time since the GMSF 2020 and similarly the need to have continuous dialogue with key stakeholders on matters of strategic importance. The effect of the proposed amendments on the overall strategy and objectives of the plan have substantially the same effects on the participating nine districts as GMSF 2020.

(iv) Clarification of policy wording

Minor changes to policies, referred to above, have been made to assist interpretation of the policies. It is not considered that they impact on the overall objectives of the policies or specific allocations. Therefore, the effect of the policies on the remaining nine districts remains substantially the same as they did in GMSF 2020. However, they make the plan less ambiguous, in line with NPPF.

(v) Minor typographical changes.

This category relates to the correction of spelling and grammatical errors only and therefore result in a plan which has a substantially the same effect on the participating districts as GMSF 2020.

- 5.2 Having considered the impact of the five different categories of changes above, it is necessary to consider if their cumulative impact would result in a plan which has substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, as with the above assessment, "substantially the same effect" does not mean "the same effect". It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations.
- 5.3 The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change. However, in determining the cumulative impact of these multiple changes, it is important to consider what impact they have had on the overall Vision, Objectives and Spatial Strategy of PfE 2021 compared to GMSF 2020, particularly for the decision maker in implementation terms.
- 5.4 As set out above and presented to the Joint Committee (20 July 2021), the resultant impact of the changes on the overall strategy of the joint plan and its effect on the remaining nine districts is limited.

- 5.5 On this basis, officers have concluded, as presented to and agreed by the Joint Committee (20 July 2021), that PfE 2021 has substantially the same effect on the 9 boroughs as the GMSF 2020 and it is recommend that the plan proceeds to a Publication stage (Regulation 19) consultation.
- 5.6 As appended to the report to the Joint Committee, Leading Counsel has provided a note confirming the relevant statutory provisions and endorsing the approach and conclusions of officers that the plan has substantially the same effect.

6. PLACES FOR EVERYONE PUBLICATION PLAN 2021 CONTENT

6.1 PfE 2021 provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes and protect, and enhance the natural environment. The Plan is not being prepared in isolation. It is supported by the Transport 2040 Delivery Plan, which outlines the interventions required to achieve the transport vision for the city region and is one of a suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside the Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital and Cultural Strategies. Places for Everyone is a joint development plan document for nine of the Greater Manchester boroughs, to manage growth, so that the city region is a better place to live, work and visit. It:

- sets out how they should develop up to the year 2037,
- identifies the amount of new development that will come forward in terms of housing, offices, and industry and warehousing, and the main areas in which this will be focused,
- identifies the important environmental assets which will be protected and enhanced,
- allocates sites for employment and housing required outside of the urban area,
- supports the delivery of key infrastructure, such as transport and utilities,
- defines a new Green Belt boundary for the 9 boroughs.

6.2 Spatial Strategy

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

6.3 Jobs

6.4 Economic prosperity is central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities in Tameside. In the face of the uncertainty brought by the COVID-19 pandemic, there is a need to continue to invest in the borough to drive its recovery.

- 6.5 The Greater Manchester Independent Prosperity Review: One Year on 2020 indicated that Greater Manchester was the most economically diverse city region economy with world-class strengths in advanced materials and health innovation. There is however a growing body of evidence that indicates the worst effects of the COVID-19 pandemic have amplified pre-existing patterns of not only health, but also economic inequality. With some of the most deprived areas of the country located within the borough, growing inequalities is a significant area of concern and has a major impact on quality of life for many Tameside residents. As emergency support schemes from government are withdrawn, Tameside, as part of Greater Manchester, has the opportunity to lead with the 'levelling up' agenda helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole.
- 6.6 This Plan supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the even longer-term. However, delivering these high levels of growth means that there will be need to continue to invest in the sites and critical infrastructure required to make this a more attractive place for businesses to invest, bringing high-value, well paid jobs, and invest in skills and business. In pursuit of this, the plan sets a target across Greater Manchester over the plan period of;
- at least 1,900,000 sq.m. of new office floorspace and
 - at least 3,330,000 sq.m. of industrial and warehousing floorspace.
- 6.7 As in GMSF 2020, a large share of development in Tameside within PfE 2021 is expected to be accommodated on sites within the existing urban area. However, in support of the Plan and the priorities and economic ambitions identified within the borough's Inclusive Growth Strategy, one site, Ashton Moss West continues to be identified as a Green Belt deletion and allocated for employment uses. The use classes prescribed have more recently been brought up to date in line with government changes to the Use Classes Order and overall development yields for the site have been reduced from around 175,000 square metres of potential floorspace to around 160,000 square metres, which follows further analysis of potential development constraints.
- 6.8 **Homes**
- 6.9 Greater Manchester is facing a housing crisis and the impact of Covid 19, with potential increases in unemployment, will exacerbate this. Although boroughs have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. Additionally the construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites as identified on the Council's Brownfield Land Register.
- 6.10 Applying the Governments current standard methodology means that around 10,300 (10,305) homes are required per annum across the nine boroughs, equating to just under 165,000 (164,880) new homes over the plan period. The plan also supports Greater Manchester's commitment to deliver more affordable housing, 50,000 units over the plan period, including 30,000 for social or affordable rent.
- 6.11 As in GMSF 2020 and detailed below a large share of housing development in Tameside within PfE 2021 is expected to be accommodated on sites within the existing urban area. However, in support of the Plan and the priorities and ambitions identified within the borough's emerging Housing Strategy, two sites, one at Godley Green Garden Village and one at the South of Hyde continue to be identified as Green Belt deletions and are allocated for residential uses, effectively topping up the baseline land supply.

- 6.12 Godley Green continues to be identified as having potential to accommodate around 2,350 new homes, although not all are envisaged to be delivered within the plan period, and South of Hyde around 440 new homes.
- 6.13 The 2019/20 baseline land supply, prepared for the proposed GMSF 2020, continues to be utilised to support PfE 2021. This shows that between 2020-2037 Tameside's existing land supply (6,347 units), the majority of which are on brownfield sites (5,017 units), will be where the bulk of development is brought forward. To top this up a small windfall allowance (576 units) and strategic sites (1,558 units) are included, giving a total 2020-2037 supply of 8,481 units. It is estimated that first year completions (of circa 281 units in 2020/21) mean a remaining total supply of 8,200 units exists over the plan period. The plan maintains a strong focus on directing new development toward sites within the existing urban area, which are often sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in such locations as presented within the Council's Strategic Housing and Economic Land Availability Assessment¹², helps reduce the need to make use of Green Belt land for development.
- 6.14 Alongside the identification of the three strategic allocations for growth, 12 sites continue to be identified for further protection through being added to the Green Belt, as set out below.
- 6.15 PfE 2021 also continues to set a housing target for the borough over the revised plan period 2021-2037. This represents a revised annual average target of 485 units, compared to 475 proposed in GMSF 2020. In addition, the plan continues to take a stepped approach to the phasing of this across three time slices. Initially setting an annual target of 299 units before stepping to 485 and then to 591 units respectively.
- 6.16 **Green Belt**
- 6.17 All three of Tameside's strategic sites maintain the same level of land to be taken out of the Green Belt (known as Green Belt deletions). This is mirrored through allocation boundaries that remain the same as were proposed in GMSF 2020, which included the addition of a small parcel of non-Green Belt land at the South of Hyde site. This is adjacent to Hilda Road and is to facilitate access to the eastern parcel of land from the A560.
- 6.18 Alongside the identification of three sites for development purposes, PfE 2021 also identifies a number of sites to be protected and added to the Green Belt (known as Green Belt additions).
- 6.19 The existing Green Belt in Tameside extends to approximately 5,071 hectares and a further 75.19 hectares of land in the borough, across 12 sites, have been identified within the Publication plan to be designated as such. Initially 17 sites had been proposed within the 2019 GMSF and a further three sites were put forward through the 2019 consultation, Following further analysis of the proposed additions, there are now 12 sites taken forward as follows:
- Fox Platt, Mossley;
 - Cowbury Green, Long Row, Carrbrook;
 - Woodview, South View, Carrbrook;
 - Manor Farm Close, Waterloo, Ashton-under-Lyne;
 - Ridge Hill Lane, Ridge Hill, Stalybridge;
 - Yew Tree Lane, Dukinfield;
 - Hyde Road, Mottram;
 - Ashworth Lane, Mottram;
 - Broadbottom Road, Broadbottom;

¹² <https://www.tameside.gov.uk/Planning/Strategic-Housing-Land-Availability-Assessment>

- Cemetery Road, Denton;
- Ardenfield, Haughton Green, Denton; and
- Horses Field, Dane Bank, Denton

6.20 This means that the overall net change in Green Belt for the borough is a 2.7% reduction, this is comparative to an initial net reduction in 2016 within Tameside of 8.3%, and an overall net reduction across the nine boroughs by 3.3% in PfE 2021.

6.21 Evidence

6.22 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020 and over the course of time there has been substantial work to strengthen this, being added to significantly in direct response to the 2019 consultation comments. This evidence base also remains the fundamental basis for PfE 2021 and has remained available on the Combined Authorities website since October 2020. In addition to responding to 2019 consultation comments, it has been reviewed and updated in light of the change to PfE 2021 and, where appropriate addendum reports have been produced. The evidence based documents which have informed the plan will be available in advance of the formal consultation commencing.

6.23 Alongside the summary of further evidence as set out below, a key supporting document will be a strategic Statement of Common Ground. This will set out the key matters between the nine authorities, agreeing on the distribution and quantum of development contained within the Publication Plan. There may be need for additional Statements of Common Ground to deal with specific matters linked to the proposed site allocations and these will be the responsibility of the relevant local authority to draw up if required.

6.24 It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. The position between Stockport and the remaining 9 Greater Manchester authorities has evolved from December 2020 when all 10 were co-operating on the Greater Manchester Spatial Framework, to the more recent position where, in March 2021, the 9 remaining local authorities agreed to produce a joint plan (Places for Everyone) following the Stockport decision to withdraw from the joint plan to prepare its own local plan.

6.25 In the light of this it has been necessary to ‘reset’ the Duty to Co-operate arrangements. The outcome of the GMSF work was an agreed approach to the scale and distribution of development and a number of housing and employment allocations to ensure that the overall Vision and Objectives of the Plan were met. Whilst the outcome of the spatial strategy was some individual districts not meeting their LHN and some exceeding theirs, the extent to which districts were meeting need was never a defining factor in determining distribution. No district was identified as having ‘unmet’ needs as overall Greater Manchester was meeting its collective LHN and supporting the spatial strategy. At this point in time, the 9 districts do not have an understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport’s assessment of it and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs. Duty to cooperate discussions with Stockport continue

6.26 Additionally, as part of the development of GMSF 2020 an Integrated Assessment 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.

- 6.27 The Integrated Assessment contributed to the development of the GMSF through an iterative assessment process, which reviews the draft policies and the discrete site allocations against a framework of questions. Consultation is a significant part of developing the Integrated Assessment, and the opinions and inputs of stakeholders have been sought on it in the past and will continue to be sought through the next consultation.
- 6.28 Given the conclusion reached above, that PfE 2021 has substantially the same effect as the GMSF 2020 would have had on the nine districts, enabling the application of S.28(6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” which is being assessed is one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. In view of this, the environmental assessments carried out at previous stages remain valid (including their scope). That said, addendum reports have been prepared to assess the impact of the changes between GMSF 2020 and PfE 2021 against the Integrated Assessment framework and these are available alongside the GMSF 2020 IA documentation.
- 6.29 A Habitats Regulations Assessment (HRA) has also been prepared, which 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.
- 6.30 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.
- 6.31 As was the case with GMSF, PfE 2021 is regarded as a Plan which is considered likely to have significant effect on one or more European protected site and has therefore been informed by an HRA with mitigation measures identified as appropriate.
- 6.32 Additionally, in relation to evidence, significant work has progressed in relation to transport matters and in particular the issue of congestion, which many previous respondents referred to as an area of concern requiring further investigation and consideration. Each of the three strategic allocations in Tameside is now accompanied by a Locality Assessment, which considers transport matters in detail and identifies potential mitigation. The assessment has been reviewed in 2021 to ensure it remains fit for purpose in light of updated modelling. In addition, the 2040 Transport Strategy Delivery Plan accompanied by a Local Implementation Plan continues to identify priorities for transport investment in Tameside, aligning these with growth priorities.
- 6.33 Preliminary Ecological Appraisals have also been undertaken for each of the proposed strategic allocations. The appraisals respond to biodiversity concerns raised through the 2019 consultation, identify important habitat, species and ecological designations and also provide a baseline for further monitoring while identifying where further assessment may be required.

- 6.34 Historic Environment Assessments have also been undertaken across the three strategic allocations, identifying matters of built heritage and archaeological consideration. Again, these assessments respond to consultation comments, provide a baseline for further work and identify a range of positive opportunities which, masterplans could explore and policies have sought to incorporate. Additional dialogue with Historic England following the proposed GMSF 2020 has led to further minor amendments in PfE 2021, in particular to the South of Hyde policy in relation to the historic environment.
- 6.35 Further analysis was also undertaken of potential constraints across the three strategic allocations following discussions with a range of utility providers, alongside the development of other evidence to support GMSF 2020 and which continues to substantiate PfE 2021. This evidence primarily relates to Green Belt harm, flood risk and viability. As an output from this combined work, all three strategic allocations in Tameside are shown to be able to deliver viable schemes.
- 6.36 A narrative for each site that draws together the above relevant detail is presented, within a site allocation topic paper for each site, to help draw together the many strands of thematic evidence.
- 6.37 While the above points provide a summary of those which are likely to be of particular interest and importance to the Borough, PfE 2021 continues to also set out a range of other thematic planning policies, which will become material planning considerations as part of the borough's Development Plan, against which Development Management decisions will be made. These thematic policies are wide ranging in subject matter and provide scope to prepare future Supplementary Planning Documents to assist local interpretation. Following adoption of PfE, each borough will update their own Local Plan, because as a high level strategic plan, PfE does not cover everything that a district local plan would, and work has already started to review which policies within Tameside's existing planning framework are likely to be replaced by content within the Places for Everyone. As appended to the Joint Committee report, which policies within each Council's Plans, including those of the Councils Unitary Development Plan are expected to be replaced by PfE 2021 are identified within a schedule.

7. CONCLUSION

- 7.1 In 2014 the Council resolved to work collaboratively with those in Greater Manchester to prepare jointly a strategic planning document for the city region, the GMSF. While recent decisions mean this is now a joint plan of nine boroughs, Places for Everyone 2021 is considered to have substantially the same effect as GMSF 2020, as previously presented to Members for consideration. It is proposed therefore to continue to proceed to Publish the plan at the next consultation stage, which represents a move toward the culmination of the plan making process, prior to submission to the Secretary of State for independent examination.
- 7.2 The plan, alongside thematic policy content, identifies three strategic sites in Tameside for growth and twelve sites for further protection as additions to the designated Green Belt. Alongside this, it also seeks to provide the borough with an up to date housing target, the strategic context for the borough's Local Plan and updated development management policies to be used in the determination of planning applications.

8. RECOMMENDATIONS

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