

## Report to Overview and Scrutiny / Cabinet / Council



Date of Meeting	Overview & Scrutiny 22 July 2021 Cabinet 27 July 2021 Council 28 July 2021
Portfolio	Cabinet Member for Economy and Communications
Report Author	Paul Moore
Public/Private Document	Public

### Places for Everyone Joint Development Plan Document

#### Executive Summary

- 1.1 Following the withdrawal of Stockport Council from the production of the Greater Manchester Plan for Jobs, Homes & the Environment, the Greater Manchester Spatial Framework, the AGMA Executive Board agreed to consider producing a joint Development Plan Document (DPD) of the nine remaining Greater Manchester (GM) districts.
- 1.2 Earlier this year, the 9 Councils approved the setting up of a Joint Committee to progress the Joint Development Plan document, to be known as 'Places for Everyone'.
- 1.3 This report sets out the process that has been undertaken to date, the content of the plan and the next steps. Specifically the report seeks approval to undertake a Regulation 19 consultation on the plan and, following that consultation, approval to submit the plan to the Secretary of State for independent examination.

## Recommendation

### 2.1 Cabinet is recommended to:

1. Approve the PfE: Publication Draft 2021, including strategic site allocations and Green Belt boundary amendments, and reference to the potential use of compulsory purchase powers to assist with site assembly, and the supporting background documents, for publication pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for an 8 week period for representations to begin not earlier than 9 August 2021
2. Delegate authority to the Director of Economy, in consultation with the Portfolio Holder for Economy and Communications, to approve the relevant Statement of Common Ground(s) required pursuant to the National Planning Policy Framework 2019.
3. Delegate authority to the Director of Economy, in consultation with the Portfolio Holder for Economy and Communications, to approve necessary changes to the Council's Statement of Community Involvement (SCI) and Local Development Scheme (LDS) to reference the Places for Everyone 2021 Joint Development Plan Document.

### Council is recommended to:

4. Approve Submission of the Places for Everyone Publication Plan 2021 to the Secretary of State for examination following the period for representations;

## Reason for Recommendation

- 3.1 The Places For Everyone Joint Development Plan 2021 is a statutory plan and requires approvals from Cabinet and Full Council for the next stages.

## Key Points for Consideration

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

of planning applications through the publication of emergency guidance to enable local authorities to continue to exercise their planning functions in a Covid-19 compliant way.

- 4.3 Up until December 2020 a joint development plan document of the ten Greater Manchester local authorities was being prepared, Greater Manchester's Plan for Jobs, Homes & the Environment (known as the "GMSF"). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process, however, the decision at Stockport Council's meeting on 3 December to not submit the GMSF 2020 to the Secretary of State for independent examination following the consultation period, and the subsequent resolution at its Cabinet meeting on 4 December not to publish the GMSF 2020 for consultation, in effect signalled the end of the GMSF as a joint plan of the 10.
  - 4.4 S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply where one authority withdraws from an agreement to prepare a joint DPD. Together they enable a joint plan to continue to progress in the event of one of the authorities withdrawing, provided that the plan has "substantially the same effect" on the remaining authorities as the original joint plan
  - 4.5 Consequently, at its meeting on the 11th December 2020, members of the AGMA Executive Committee asked officers to report back on the implications and process of producing a joint DPD of the nine remaining Greater Manchester (GM) districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan). One of the key issues that officers were asked to explore was the extent to which the joint Places for Everyone plan could take advantage of the provisions set out in paragraph 1.4 above, and proceed to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 Publication stage rather than have to go back to an earlier (Regulation 18) informal stage of consultation.
  - 4.6 The 'Publication stage' is a formal consultation on the draft joint DPD pursuant to Reg. 19 of the Local Planning Regulations. It is a statutory stage that provides an opportunity for organisations and individuals to submit their final views on the content of the plan. The decision to 'Publish' the draft joint DPD is an Executive decision for the participating local authorities.
  - 4.7 Following consultation on the Publication Plan, the draft joint DPD and the representations made in the Publication stage are sent to the Secretary of State – this is called the 'Submission stage', pursuant to Reg. 22 of the Local Planning Regulations. Upon completion of the consultation on the Publication Plan in late 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities.
  - 4.8 At the AGMA Executive Board meeting on 12 February 2021, a report was considered setting out the merits of continuing to produce a joint plan of the nine remaining GM districts, to be known as "Places for Everyone".
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- 4.9 The report highlighted that producing such a plan would enable those nine districts to continue to:
- progress the strategic policies in GMSF 2020, for example net zero carbon development, affordable housing and space and accessibility standards for new housing
  - maximise the use of sustainable urban/brownfield land and limit the need for Green Belt to accommodate the development needs of the nine
  - align with wider Greater Manchester strategies for transport and other infrastructure investment
  - utilise the evidence base already commissioned and completed, minimising the cost of producing further evidence
  - spread the cost jointly of the independent examination
- 4.10 At the meeting, it was noted that each district would be asked to approve the making of an agreement with each other to prepare a joint Development Plan Document. Subsequently, each of the 9 districts have sought approval to establish a Joint Committee and to delegate the formulation and preparation of a joint Development Plan Document to the Joint Committee.

#### **DIFFERENCES BETWEEN PLACES FOR EVERYONE 2021 AND GMSF 2020**

- 4.11 The text of the GMSF2020 has been revised following the withdrawal of Stockport. The Places for Everyone Publication Plan 2021 (PfE2021) is attached at Appendix 2 The revisions to the PfE2021 (as compared to GMSF 2020) 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, 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 9 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.
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**(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.

- 4.12 The Joint Committee Report sets out an assessment of these changes in order to determine whether or not the 2021PfE plan had 'substantially the same effect' on the remaining 9 districts as the 2020 GMSF. This report concludes that the PfE2021 has substantially the same effect on the 9 boroughs as the GMSF 2020 and recommend that the plan, approved at the committee, proceeds to a Publication stage (Regulation 19) consultation.

The Joint Committee report that contains this assessment along with the related Appendix can be viewed here <https://democracy.greatermanchester-ca.gov.uk/mgCommitteeDetails.aspx?ID=412>

- 4.13 On the basis of next stage being the publication of the plan, the timetable for preparation of the PfE 2021 plan is:
- Publication Plan (Regulation 19) – period for representations August – October 2021
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- Submission (Regulation 22) – January 2022
- Examination- 2022/23
- Adoption - 2023

## **PLACES FOR EVERYONE PUBLICATION PLAN 2021**

- 4.14 The PfE2021 provides an important opportunity to create the conditions for inclusive economic growth, provide opportunities for provision of much needed homes, protect, and enhance the natural environment. The Plan is not being prepared in isolation. It is supported by the Transport 2040 Delivery Plan, which will outline the interventions required to achieve the transport vision for the city region and is one of a suite of strategic documents setting out how Greater Manchester can achieve the ambition set out in the Greater Manchester Strategy. It sits alongside the Local Industrial Strategy, Housing Strategy, 5 Year Environment Plan, Digital and Cultural Strategies.
- 4.15 This is our plan for sustainable growth in the 9 boroughs, 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.
- 4.16 Our vision is for a Greater Manchester which emerges from the pandemic a more resilient and better city-region. The impact of Covid 19 on people's lives and wellbeing as well on our economy and communities is not yet known but will be severe. There is an opportunity to capture some of the changes, for example the on the increase in cycling and walking and the acceleration in flexible working that we have seen over the recent months, and harness this to cement the benefits for our towns and cities. Greater Manchester needs to be a place where all of our people can access the services they require through high quality digital communications and where our town and city centres can respond to the decline in their traditional retail role in positive ways. One of the biggest lessons of the pandemic is the importance of good quality greenspace close to where people live. This is particularly important in our densely populated and deprived neighbourhoods.

### **Spatial Strategy**

- 4.17 The spatial strategy seeks to deliver sustainable, inclusive growth. It has 3 key spatial elements;
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- Significant growth in jobs and housing at the core – continuing development in the ‘core growth area’ encompassing the city centre and beyond to the Etihad in the east, through to the Quays, Trafford Park and Port Salford in the west. The majority of commercial employment growth is proposed in this area and over 50% of overall housing supply is found here and in the wards immediately surrounding it.
- Boosting the competitiveness of the northern districts – provision of significant new employment opportunities and supporting infrastructure and a commitment that collectively the northern districts meet their own local housing need
- 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.

## **Jobs**

- 4.18 Economic prosperity is central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities. In the face of the uncertainty wrought by Covid 19, we know that we need to continue to invest in our city and town centres to drive our recovery. We need to continue to develop our Research and Development capabilities underpinned by our excellent academic institutions as well as investing in strengthening existing, and creating new, employment locations so that all communities are able to contribute to, and benefit from, growth.
- 4.19 The Greater Manchester Independent Prosperity Review: One Year on 2020 indicated that Greater Manchester was the most economically diverse city region economy with world-class strengths in advanced materials and health innovation. Yet the Prosperity Review also acknowledged that for two decades Greater Manchester’s productivity consistently remained at 90% of UK level and a year on this gap persists.
- 4.20 There is a growing body of evidence that the worst effects of the COVID-19 pandemic have amplified pre-existing patterns of not only health, but also economic inequality. This gap is linked to economic inequality with overall pay levels and salary growth in Greater Manchester lagging behind UK averages. The growth in employment in low productivity sectors witnessed in Greater Manchester over the last decade further explains this, as these sectors are likely to pay lower wages and invest in lower value business models which perpetuate the challenges. Furthermore, it is in these sectors of the foundational economy (retail, hospitality and leisure) in which employees have tended to be hardest hit during the COVID-19 crisis.
- 4.21 Growing inequalities have a major impact on quality of life for Greater Manchester residents such as the ability to afford decent housing, good quality food and services. As emergency support schemes from government are withdrawn, a greater focus is needed to support businesses in the
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foundational economy in a Greater Manchester has the opportunity to lead with the 'levelling up' agenda helping to deliver a more successful North of England and aiding the long-term economic success of the country as a whole. This Plan supports high levels of economic growth across Greater Manchester and seeks to put in place the measures that will enable such growth to continue in the even longer-term. However, delivering these high levels of growth means that Greater Manchester will need to continue to invest in the sites and critical infrastructure that will make it an even more attractive place for businesses to invest, bringing high-value, well paid jobs, to the city region; invest in skills and business development to support the foundational economy, and promote the continued progress towards a low-carbon economy.

- 4.22 In pursuit of this, the plan sets a target of at least 1,900,000 sq.m. of new office floorspace and at least 3,330,000 sq.m. of industrial and warehousing floorspace across Greater Manchester over the plan period.

### **Homes**

- 4.23 Greater Manchester is facing a housing crisis and the impact of Covid 19, with potential increases in unemployment will exacerbate this. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To address the supply side Government has introduced a standard methodology for calculating local housing needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. The construction of new housing is also an important part of the economy, providing large numbers of jobs and often securing the redevelopment of derelict and underused sites.
- 4.24 Applying the current methodology means that around 10,300 (10,305) homes are required in per annum, equating to just under 165,000 (164,880) new homes over the plan period. The plan supports Greater Manchester's commitment to deliver more affordable housing - 50,000 units over the plan period, including 30,000 for social or affordable rent.

### **Environment**

- 4.25 The Plan is not solely concerned with accommodating development. It also includes a range of policies designed to protect and enhance our many and varied green spaces and features which are used in many different ways and afforded many different values by the people who live, work or visit the city-region.
- 4.26 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
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- Seeking to maintain a new and defensible Green Belt which will endure beyond the plan period.
- 4.27 Furthermore, the plan supports wider strategies around clean air, walking and cycling and underpins Greater Manchester's ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 and to keep fossil fuels in the ground.

### **Brownfield land preference**

- 4.28 There is a strong focus in the GMSF on directing new development towards sites within the existing urban area, which are often in sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in the urban area reduces the need to release greenfield and Green Belt land for development.
- 4.29 The land supply identified for development in the plan is largely within the urban area:
- Offices - 99%
  - Industry and Warehousing- 47%
  - Housing - 90%
- 4.30 There are significant viability issues in parts of the conurbation and there is a need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The recently announced Brownfield Housing Fund is targeted at Combined Authorities and begins to help to address viability issues but it is not enough to enable the full potential of our brownfield land supply to be realised.

### **Green Belt**

- 4.31 The PfE 2021 Plan proposes a limited release of a Green Belt for both housing and employment. The net loss of Green Belt proposed is 1,754 hectares. This represents a significant reduction from the 4,371 hectares which were proposed for release by the nine PfE districts in the 2016 GMSF. This has been achieved through:
- Removing a number of sites
  - Reducing the extent of Green Belt release within sites and retaining more Green Belt within some sites
  - Proposing a limited number of Green Belt additions
- 4.32 The proposals in the Plan would result in the overall extent of the nine PfE districts Green Belt reducing by 3.3%. The current Green Belt covers almost 47% of the land covered by the nine PfE districts the proposals in this Plan would reduce this by just under 2 % with over 45% (45.2%) of the PfE Plan are remaining as designated Green Belt.
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## **RELATIONSHIP WITH DISTRICT LOCAL PLANS**

- 4.33 PfE2021 is key to create the foundations for the scale of growth and ambition across our boroughs. It will be part of the Development Plan for each participating local authority, but it is a high level, strategic plan and does not cover everything that a district local plan would. Appendix 1 sets out the policies in the Rochdale Local Plan which will be replaced by the PfE2021. Local plans will continue to be important to take forward the PfE2021 strategic policies and interpret these at a more detailed local level to support the creation of locally distinctive high quality places/neighbourhoods. Following adoption of the PfE2021, each district will be updating their own local plans.

## **INTEGRATED ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT**

- 4.34 As part of the development of the GMSF 2020, an Integrated Assessment (IA) was undertaken incorporating the requirements of:
- Sustainability Appraisal (SA): mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
  - Strategic Environmental Assessment (SEA): mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
  - Equality Impact Assessment (EqIA): required to be undertaken for plans, policies and strategies by the Equality Act 2010.
  - Health Impact Assessment (HIA): there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 4.35 The IA contributed to the development of the GMSF through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.
- 4.36 Given the conclusion of the Joint Committee 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 IA framework and these are available alongside the GMSF 2020 IA documentation.
- 4.37 A Habitats Regulations Assessment (HRA) refers to several distinct stages of Assessment which must be undertaken in accordance with
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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

- 4.38 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.
- 4.39 As was the case with GMSF, PfE2021 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.

## **KEY ISSUES AND PROPOSALS FOR ROCHDALE**

### **Homes**

- 4.40 It is important that we plan to provide a range of new homes to accommodate the housing needs of a growing population. The PfE 2021 will set the housing and employment land targets for each of the 9 local authorities. The housing land target is set by the Government using the standard methodology for calculating Local Housing Need (LHN). The plan will have a start date of 2021 and the plan period will end in 2037. The total LHN for Rochdale in this period is 8,048 homes.
- 4.41 There is a total requirement across the plan area for 164,880 net additional dwellings, which is 10,305 new homes per annum. The plan takes the total LHN for the area and redistributes this across the 9 local authorities in accordance with the spatial strategy. The spatial strategy seeks to focus growth in the urban core, whilst boosting the competitiveness of the northern parts of GM. Rochdale's total housing requirement in the plan, based on this redistribution is 9,858 new homes which equates to 616 homes per annum. This means Rochdale is delivering 122% of its LHN target.
- 4.42 Historically there have been issues of economic underperformance in the north of the GM conurbation which has resulted in these districts performing poorly in comparison to districts in the south. Supporting higher levels of new housing and employment in the northern districts will assist in achieving a more balanced pattern of growth across the plan area and a better distribution of skilled workers to support local economies, helping to reduce disparities. The PfE 2021 allows Rochdale to bring forward sites that will deliver strategic benefits over the longer term and will assist in rebalancing the housing stock within the borough, which is heavily skewed to homes in Council Tax Bands A-C. These site will deliver a quality of housing offer and choice that would be difficult to bring forward on brownfield land within the urban area. The sites identified the sites are either highly accessible to
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public transport, drive regeneration or provide other local benefits or are a combination of these.

- 4.43 The PfE 2021 plan sets out targets for the provision of affordable homes across the plan area. Rochdale will seek to deliver an appropriate level of affordable housing having regard to this general target and relevant Local Plan policies.

#### Housing Land Supply

- 4.44 Rochdale's existing supply of housing sites as at 2020 had the capacity to accommodate around 7,997 homes comprising brownfield sites, 1000 homes at J19 South Heywood and other sites. As the housing supply has not as yet been updated to 2021 for the purposes of PfE plan an assumption is made in terms of completions in the period 2020-21 and these are taken off the supply.
- 4.45 However, even taking account of assumed completions in the last year (2021-22) there simply isn't enough land within the existing urban area to enable Rochdale to meet its plan target.
- 4.46 The plan seeks to address the shortfall in the existing supply of housing by identifying additional sites outside the existing urban area including land currently designated as Protected Open Land and Green Belt. The Green Belt in Rochdale is drawn tightly around the existing urban area and, in order to meet the housing target, it has been necessary to consider sites that are currently designated as Green Belt.
- 4.47 The proposed allocations for housing in the PfE 2021 plan are as follows:

<b>Site</b>	<b>Total no. of homes</b>
Simister/Bowlee	200
Stakehill	1,681
Bamford/Norden	450
Castleton Sidings	125
Crimble Mill	250
Land North of Smithy Bridge	300
Newhey Quarry	250
Roch Valley	200
Trows Farm	550
<b>Total</b>	<b>4,006</b>

- 4.48 These equates to a supply of 11,434 homes within the plan period and includes a buffer of approximately 16%. This buffer is considered appropriate, reflecting the challenge we face with the viability of our existing land supply and brownfield sites.
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## **Jobs**

- 4.49 Economic growth is central to the overall strategy for the plan. It will be essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities.
- 4.50 Over recent years, the northern districts of GM, including Rochdale, have seen relatively low levels of growth overall compared to other parts of the city region, and this is forecast to continue.
- 4.51 In Rochdale, a major contributing factor to this has been an inadequate supply of suitable, high quality employment land which has undoubtedly held back the Borough's economy due to the lack of opportunities for attracting new inward investment and for the Borough's existing businesses to grow.
- 4.52 If these disparities between the northern and southern areas increase, this will be harmful not only to the prospects for the north but also to those of the plan area as a whole. As a result, a key aim of the plan is to significantly boost the competitiveness of and economic output from the northern districts to deliver more balanced and inclusive growth across the sub-region.
- 4.53 To help achieve this aim, the plan identifies a key proposal for employment-led development at the Northern Gateway (Heywood/Pilsworth) which is currently designated as Green Belt and straddles Rochdale and Bury to the north of the M62 and to the east of the M66.
- 4.54 This site is of national significance and has the potential to deliver transformational economic benefits. It is estimated that the full development of this site could generate 1.2 million square metres of employment floorspace (including an Advanced Manufacturing Park), creating new job opportunities that would be highly accessible to Rochdale residents. It is also proposed to expand the existing Stakehill Industrial Estate (JPA2); a highly successful existing employment site where we know market demand exists for further investment

## **Green Belt**

- 4.55 The sites in Rochdale that have been proposed for employment and housing development in the PfE have evolved as the plan has progressed through its various stages of preparation. Some of these changes to the sites have been made to reflect new and updated evidence and public views expressed in response to consultation on the previous drafts.
- 4.56 The changes have resulted in a reduction in the proposed net loss of Green Belt in the current PfE 2021 compared to what was originally proposed in the first draft GMSF in 2016 and what was subsequently proposed in the revised draft GMSF in 2019.
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- 4.57 These changes include the removal of the site at Kingsway South, a significant reduction in the amount of Green Belt lost on Simister/Bowlee, amendments to Stakehill and a number of new additions to the Green Belt.
- 4.58 These amendments mean that the PfE 2021 is now proposing a net loss of 389 hectares of the Borough's Green Belt which results in a 2.5% reduction in the proportion of the borough that is designated as Green Belt. This compares with a 4.6% reduction in the 2016 GMSF and a 2.9% reduction in the 2019 GMSF.

### **Supporting Infrastructure and Delivery**

- 4.59 In addition to the GM Transport Strategy 2040, and associated Delivery Plans, PfE 2021 identifies a range of physical and social infrastructure interventions that will be required to support the new development proposals. These infrastructure requirements will be embedded within the statutory planning policies contained in the plan and any planning applications for development on these sites will need to be in line with these policy requirements for them to be approved. Planning conditions and legal agreements will ensure that the necessary infrastructure is delivered at an appropriate stage in the development process.
- 4.60 Since the consultation on the 2019 Draft GMSF Rochdale has secured millions of pounds in external funding to support major infrastructure improvements across the borough. Many of these will support the developments proposed in the PfE 2021 and include:
- £23 million for the delivery of a new link road at Heywood, just off junction 19 of the M62
  - £3.5 million for the delivery of a new loop road within Kingsway Business Park
  - £11.5 million for the construction of a brand new cycle lane between Castleton and Rochdale town centre
  - £500,000 to further develop proposals to extend the tram network to Heywood
  - Almost £30 million of government funding has been committed for major flood defence schemes across the borough to protect homes, business and infrastructure

### **Updates to Statement of Community Involvement (SCI) and Local Development Scheme**

- 4.61 The change from GMSF to the PfE 2021 Plan requires some associated changes to be made to the Council's SCI and LDS. These are actual and reference changes to reflect the PfE 2021 Plan and its associated timetable. Consequently, a recommendation is included in this report to delegate approval to make these amendments.

### **EVIDENCE BASE**

- 4.62 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. This evidence base remains the fundamental
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basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. This evidence base has been reviewed and updated in the light of the change to the PfE2021 and, where appropriate addendum reports have been produced. The evidence documents which have informed the plan are available on the website, in advance of the formal consultation starting.

- 4.63 One key supporting document is the Statement of Common Ground. This will set out the key matters between the 9 authorities agreeing on the distribution and quantum of development contained in the Publication Plan. It will also deal with any matters with other organisations, including Stockport as one of our neighbouring local authorities, that need to be agreed to enable the Plan to be submitted next year. There may be a need for additional Statements of Common Ground to deal with specific matters linked to the proposed site allocations and these will be the responsibility of the relevant local authority to draw up if required.
- 4.64 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.
- 4.65 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
- 4.66 The PfE2021 and supporting documents can be found at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>
- 4.67 This website will be updated following the district approval process and the consultation portal (GMConsult.org) will become live at the start of the formal consultation.

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## PREVIOUS CONSULTATION

- 4.68 Four consultations took place in relation to the GMSF. 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.
- 4.69 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. 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.
- 4.70 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 to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 4.71 At this stage, whilst anyone can make a representation on any point, only those pertaining to 'soundness' will be taken into account by the Inspector(s). The term 'sound' is used to describe a Local Plan that has been prepared in accordance with what Government expects of local planning authorities. As set out in paragraph 35 of the National Planning Policy Framework, plans are sound if they are;
- 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.
- 4.72 Inspectors also consider submissions concerning legal compliance issues, for example the Integrated Assessment, the Habitats Assessment Regulation and the Duty to Co-operate.
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## COMMS AND ENGAGEMENT PLAN

- 4.73 The consultation will be carried out in line with the requirements of Rochdale's Statement of Community Involvement.
- 4.74 The Joint Committee report contains a summary of the CA Comms and Engagement Plan. This includes details of the methods used in terms of disseminating the information and consultation on the publication plan. This summary along with the related Appendix can be viewed in the Joint committee report here: <https://democracy.greatermanchester-ca.gov.uk/mgCommitteeDetails.aspx?ID=412>
- 4.75 Effective community and stakeholder engagement will be promoted by means which are reasonably practicable. Government guidance strongly encourages the use of online engagement methods.
- 4.76 In terms of Rochdale we will use GM marketing assets and complement them using our local messaging to highlight the key messages for our borough. All of our content, including web content and social media messages, will point to the CA consultation hub.
- 4.77 Given the ongoing uncertainty, around the type of social distancing restrictions which may be in place at the time the consultation, different scenarios are being developed to respond to different levels of social distancing/public interaction which may be possible.
- 4.78 The planning legislation and guidance requires the plan to be justified by a detailed evidence base. Many of these documents are complex technical documents, and it is appreciated that they may be difficult to understand. All reasonable efforts will be made to ensure that documents comply with the Accessibility guidance as far as possible. Additionally a range of Topic Papers have been produced which explain the evidence and how it has informed the policies in the plan, enabling the reader to more easily understand the extensive evidence base.
- 4.79 Representations on the Plan will be submitted online through the consultation portal on the GMCA website, or by email or post.

## NEXT STEPS

- 4.80 Following consultation on the Publication Plan, the draft joint DPD and the representations made in the Publication stage are sent to the Secretary of State – this is called the 'Submission stage', pursuant to Reg. 22 of the Local Planning Regulations. Upon completion of the consultation on the Publication Plan in late 2021, a post-consultation report will be prepared and then the plan will be submitted to the Secretary of State for Examination in early 2022. Submission requires approval of each of the nine Full Councils of the participating local authorities. Whilst anyone can make a representation on any point, only those pertaining to the 4 tests of soundness will be taken into account by the Inspector(s). If major new
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issues arise at the Publication Consultation stage there would need to be further consultation prior to any submission of the plan.

- 4.81 An Examination in Public takes place at which a Planning Inspector 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.
- 4.82 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

### **ALTERNATIVES CONSIDERED**

- 4.83 Preparing our own up to date local plan but this would make addressing strategic cross boundary issues more difficult and it would exclude Rochdale from this joint plan for strategic growth.

### **Costs and Budget Summary**

- 5.1 The preparation and examination of the Places for Everyone Publication Plan 2021 generates a revenue cost for 9 local authorities. A substantial evidence base has been assembled to support the plan which has involved commissioning of specialist and independent experts. There are no current revenue implications. Following this consultation, the PfE plan will be submitted to the Secretary of State for examination. There will be further revenue costs associated with the examination process, including appointment of a Programme Officer(s) and the cost of the examination itself, including procurement of a venue, Planning Inspectors and legal advice. Further reports will be provided to the Joint Committee as appropriate.

### **Risk and Policy Implications**

- 6.1 The PfE 2021 is a key strategic planning document that will form part of the Rochdale Local Plan. There is a requirement for the Council to keep its Development Plan documents up to date and if the PfE 2021 is not progressed it may impact on the scope and delivery of the Rochdale Local Plan. Rochdale would have to prepare our own up to date local plan but this would make addressing strategic cross boundary issues more difficult and that and would exclude Rochdale from the this plan for strategic growth.
- 6.2 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.
- 6.3 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.

- 6.4 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.
- 6.5 Any equality implications of the plan have been assessed as part of its preparation through an Equality Impact Assessment. The PfE 2021 is a statutory plan which seeks to contribute to the achievement of sustainable development, delivering economic, social and environmental benefits together in a mutually reinforcing way. It is informed by an Integrated Appraisal which includes the Equalities Impact Assessment.

### Consultation

- 7.1 There have been two previous consultations on the GMSF in 2016 and 2019. We are now proposing to consult on the Publication stage.
- 7.2 It is proposed that the PfE 2021 should be subject to a further eight week period of consultation to commence no earlier than the 9 August 2021. The plan and its evidence base will have been in the public domain for around four weeks before the formal consultation, allowing people to view and familiarise themselves with the content.
- 7.3 The consultation will be carried out in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 and Rochdale's Statement of Community Involvement (SCI).

### Background Papers

### Place of Inspection

8. Here you should detail any background papers –

The PfE Publication Draft 2021 and the supporting documents are available to view at:

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

### For Further Information Contact:

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## Appendix 1 - PfE 2021 replacement of Rochdale Local Plan policies

Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 explains that 'where a Local Plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy.'

Upon adoption of the PfE 2021 Plan a number of policies in district local plans will be replaced, or partially replaced, by policies in the PfE 2021 Plan. A list of the current Rochdale Core Strategy policies to be replaced, partially or in their entirety, is set out in the table below. Any part of the policy which is not replaced will be retained and will remain part of the respective statutory development plan, along with the Core Strategy policies not listed below.

<b>Policy</b>	<b>Replaced by PFE policy/policies</b>
E2 Increasing jobs and prosperity (Partially)	JP-J3 and JP-J4
E4 Managing the release of land to meet future employment needs	JP-J1, JP-J2, JP-J3 and JP-J4
C1 Delivering the right amount of housing in the right places (Partially)	JP-H1
G1 Tackling and adapting to climate change	JP-S1, JP-S2 and JP-S3
G2 Energy and new development	JP-S1, JP-S2 and JP-S3
G3 Renewable and low carbon energy developments (Partially)	JP-S1, JP-S2 and JP-S3
G4 Protecting Green Belt land	JP-G10
G5 Managing protected open land (Partially)	JP-G10