

Manchester City Council Report for Resolution

Report to: Executive – 4 October 2023

Subject: Places for Everyone Plan: A Joint Development Plan Document for 9 Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) - Proposed Modifications Consultation

Report of: Strategic Director (Growth and Development)

Summary

To update members on the progress of Places for Everyone Plan: A Joint Development Plan Document for 9 Greater Manchester Local Authorities (Places for Everyone Plan) and to seek approval for proposed modifications to the plan.

Recommendations

The Executive is recommended to:-

- (1) Note progress made in respect of the Places for Everyone Plan (PfE).
 - (2) Agree that the PfE modifications (Main, Additional and those relating to the policies map), and associated supporting background documents be subject to a period of representations for a period of 8 weeks commencing no earlier than 9 October 2023.
 - (3) Agree the next steps for the production of the PfE Plan (as detailed in section 12 of the report).
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Wards Affected: All

Environmental Impact Assessment - the impact of the issues addressed in this report on achieving the zero-carbon target for the city

The consultation on the main modifications on PfE is the final stage of the plan prior to adoption of the plan. The consultation is a statutory stage that provides an opportunity for organisations and individuals to submit their final views on any proposed main modifications proposed for the plan. The PfE includes objectives and policies that seek to achieve a zero carbon Greater Manchester by 2038. The PfE also covers a range of issues that will have a direct bearing on successfully meeting the zero-carbon challenge by 2038.

Equality, Diversity and Inclusion - the impact of the issues addressed in this report in meeting our Public Sector Equality Duty and broader equality commitments

Places for Everyone has been subject to an equalities impact assessment as part of the process of integrated appraisal. The updated integrated assessment documentation includes a revised equalities impact assessment (Appendix A of the Addendum Report) which considers the changes proposed to the plan and any consequential impacts on the nine protected characteristics.

Manchester Strategy outcomes	Summary of how this report aligns to the OMS/Contribution to the Strategy
A thriving and sustainable city: supporting a diverse and distinctive economy that creates jobs and opportunities	The draft PfE covers this outcome, both in the strategic policies and other specific thematic policies. If Greater Manchester is to flourish in the long run, then it will need to make the most of its key assets and advantages, which can differentiate it from other places. The growth potential of a small number of locations that can boost international competitiveness will need to be maximised in order to support the prosperity of Greater Manchester as a whole.
A highly skilled city: world class and home grown talent sustaining the city's economic success	The draft PfE covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the plan area, with everyone sharing in the benefits of rising prosperity.
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	The draft PfE covers this outcome, both in the strategic policies and other specific thematic policies. The central theme of the spatial strategy for the plan is to deliver inclusive growth across the plan area, with everyone sharing in the benefits of rising prosperity.
A liveable and low carbon city: a destination of choice to live, visit, work	The draft PfE covers this outcome, both in the strategic policies and other specific thematic policies. Objective 7 of the plan seeks to ensure that Greater Manchester is a more resilient and carbon neutral area.
A connected city: world class infrastructure and connectivity to drive growth	The draft PfE covers this outcome, both in the strategic policies and other specific thematic policies. Objective 6 of the plan promotes the sustainable movement of people, goods and information. Moreover, Objective 9 of the plan

	seeks to ensure access to physical and social infrastructure.
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Full details are in the body of the report, along with any implications for:

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

Financial Consequences – Revenue

The consultation process will incur some revenue costs which can be absorbed within the planning service budget. Details of the consultation activities are set out in section 11.

Financial Consequences – Capital

No capital costs are involved in this process.

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Background documents (available for public inspection):

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

- Report to AGMA Executive Board - December 2020
- Report to AGMA Executive Board - February 2021
- Report to Places for Everyone Joint Committee - July 2021
- Report to Executive (28 July 2021), Places for Everyone Publication Plan 2021: A Joint Development Plan Document for Nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan)
- [Main modifications schedule](#)
- [Policy map/diagrams/pictures modifications schedule](#)
- [Composite Plan 2023](#)

- [Additional modifications schedule](#)
- [Integrated Assessment 2023 Addendum*](#)
- [HRA Addendum 2023](#)

*The Integrated Assessment is formed of a number of documents that can be accessed at the following web page:

[Consultation Documents as presented to District Governance Meetings - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](#)

1.0 Introduction

- 1.1 Up until December 2020 a joint development plan document (DPD) of the ten Greater Manchester local authorities was being prepared, Greater Manchester's Plan for Jobs, Homes & the Environment (known as the "GMSF"). The GMSF 2020 had reached the Regulation 19 (Publication) stage of the process, however, decisions taken by Stockport Council in December 2020 signaled the end of the joint plan of the 10. Following that decision, the remaining nine GM authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) decided to progress a joint plan of the nine and this became known as "Places for Everyone" (PfE).
- 1.2 At its meeting on the 20 July 2021, members of the Places for Everyone (PfE) Joint Committee recommended the PfE plan (and its supporting background documents) to the nine authorities for "Publication", pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 for an 8 week period for representations.
- 1.3 The "Publication" stage 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 views on the content of the plan.
- 1.4 The "Publication" stage consultation ran from August 9, 2021, for 8 weeks, ending on October 3, 2021. Over 15,000 representations were duly made, by over 3,800 individuals and organisations during that consultation stage.
- 1.5 All duly made representations, together with the Regulation 19 PfE plan, supporting background documents and a number of reports (including details of the consultation that took place, summaries of the main issues raised and the nine authorities' responses to those issues) were submitted to the Secretary of State on February 14, 2022, pursuant to Reg. 22 of the Local Planning Regulations. This is called the "Submission" stage and marked the beginning of the independent examination into the plan.

2.0 The Places for Everyone Examination

- 2.1 The examination is the final stage in the plan making process. The legislative requirements for the examination are contained in the Planning and Compulsory Purchase Act 2004 (as amended) [PCPA] and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) [the Regulations]. Some guidance on procedure is also provided in the National Planning Practice Guidance (PPG) chapter on Plan-making. However, many of the detailed procedural aspects of the examination are not prescribed in legislation, allowing the Inspector a degree of flexibility in conducting the examination. This enables the Inspector to adapt the procedures to deal with situations as they arise, so as to achieve positive outcomes in a range of different circumstances.
- 2.2 Following submission of a plan, the Inspector(s) take control of the examination process from start to finish. The Inspectors' role is to examine

whether the submitted plan meets the tests of soundness defined in the National Planning Policy Framework (NPPF)¹ and meets all the relevant legislative requirements, including the duty to co-operate². The PfE examination therefore concentrated on the issues that affect the plan's soundness and legal compliance and did not delve into other matters.

- 2.3 Three inspectors were appointed by the Planning Inspectorate (PINS) to hold an independent examination into PfE: William Fieldhouse, Louise Gibbons and Steven Lee. All three are very experienced planning inspectors and conducted the examination in a very thorough and professional way throughout.
- 2.4 The Examination officially began at the point of "Submission" (February 2022), however the hearing sessions did not start until the beginning of November 2022. In the early stages of the Examination, the Inspectors raised a number of Preliminary Questions (PQs) and Matters, Issues, and Questions (MIQs) that were prompted by their review of the plan. These probed issues of soundness and specific issues raised through consultation on the plan. The PfE authorities responded to the PQs and (together with other stakeholders) to the MIQs. In response to some of the MIQs, the PfE Team, proposed modifications to the PfE authorities to address issues raised.
- 2.5 The examination hearings sat for 12 weeks in total, including a final session at the beginning of July 2023. The sessions before Christmas considered the Spatial Strategy and thematic policies and the sessions in 2023 focused on the strategic allocations, Green Belt Additions and Monitoring. The additional session in July related to five specific proposed allocations (JPA1.1 Heywood/Pilsworth; JPA28 North of Irlam Station; JPA29 Port Salford Extension; JPA30 Ashton Moss; and JPA33 New Carrington) which include land that has been identified on the Natural England map of deep peaty soils.
- 2.6 The PfE authorities were represented by Christopher Katkowski KC throughout, with staff from the GMCA, all nine authorities and TfGM providing expert witnesses.
- 2.7 The Examination hearing sessions took place at the former Manchester Fire and Rescue Training and Development Centre in Manchester city centre. It ran very smoothly, with the Inspectors and participants alike commenting on how well organised it was. The livestreaming worked well and all the sessions remain available to view via the CA website.
- 2.8 In addition to the PQs and MIQs, the Inspectors issued 'Action Points' (APs) regularly throughout the duration of the sitting weeks. In these they asked the PfE authorities to prepare modifications to policies, which related to the detailed wording of the policies, and in respect of the allocations, involved clarification of how the allocation policies link to the thematic (sustainable, housing, greener etc) policies in the plan. With the exception of two sites, one

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

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

in Salford (JPA28 – North of Irlam Station) and one in Manchester, close to the Airport (JPA10 – Global Logistics), the Inspectors did not recommend the removal of any allocations although, in a small number of cases, they did recommend the amendment of allocation boundaries. Further details on the Inspectors reasons for recommending the deletion of the Global Logistics allocation are set out in paragraph 5.2.

- 2.9 Within their APs, the inspectors made it clear that they considered the modifications to be necessary at that stage of the examination to inform their consideration of whether the Plan is sound and/or how it could be made sound and/or legally compliant by main modifications. They also made it clear when they published their action points that they may decide that other or different main modifications are required.
- 2.10 The PfE authorities submitted responses to the Inspectors' APs with modifications proposed to the policies where these were considered necessary to make the plan sound. The responses to the individual PQs, MIQs and APs are available on the Examination website. As requested by the Inspectors, all the proposed main modifications were compiled into a main modifications schedule which was first published in July 2022 with subsequent editions being published in October and November 2022 and January, May June and August 2023. Since November 2022 iterations of a composite plan have also been published on the Examination website, alongside the proposed main modifications' schedules, to aid the reader by identifying the proposed modifications in-situ within the plan.

3.0 PfE Proposed Modifications

- 3.1 It is very normal for the outcome of a local plan examination to be that the Inspector(s) recommend main modifications [MMs] to the plan, where necessary to make the plan sound and legally compliant. As a matter of law a "main modification" can only be made if it is necessary in order to make the Plan "sound". The tests which are applied to determine whether a Plan is "sound" are those set out in the National Planning Policy Framework (NPPF). Therefore, legislation enables the Inspector to recommend a MM only if the plan would otherwise be unsound or legally non-compliant. The Inspector has no power to recommend other changes, even if they would improve the plan.
- 3.2 The Inspector agrees the text of the proposed MMs with the LPA, based in most cases on discussion at the hearing sessions. This was done through the process of Action Points outlined above and it was the responses to these, the various iterations of the proposed MMs' schedules and composite plan which informed the Inspectors' consideration of whether the PfE 2021 Plan was sound and/or how it could be made sound and/or legally compliant by MMs.
- 3.3 The Inspectors' post hearing letters was published on the examination website on 11th August 2023 and 11th September 2023. The Inspectors' post hearings' letters are based on a consideration of all the evidence and on the application of professional expertise and judgment. In their letters, the Inspectors state that they are now satisfied, at this stage of the examination, that all of the

proposed main modifications are necessary to make the Plan sound and would be effective in that regard. This conclusion is, however, without prejudice to their final conclusions that they will reach following consideration of responses to the public consultation to be carried out on the main modifications and which are the subject of this report.

- 3.4 Additional modifications (sometimes also referred to as “minor modifications”) are changes which do not materially affect the policies in the Plan. They may be made to the PfE Plan, but do not fall within the scope of the examination. A separate schedule of additional modifications has been prepared which will sit alongside the Main Modifications’ schedule during the consultation period. It should be noted that these have been prepared at this point in time to make the modified plan more readable, but the Inspectors will not consider responses made in respect of these additional modifications, as they do not fall within the scope of the Examination.
- 3.5 Whilst the consultation is only about the proposed main modifications and the policy map changes associated with these main modifications, a schedule of additional modifications and a composite plan illustrating all the proposed modifications in situ have been prepared and are available alongside this report. All documents will be made available at the time of the consultation, to assist the reader, but only representations on the main modifications are considered by the inspectors.
- 3.6 The following sections of this report set out what they mean in terms of the overall aims of the plan and also for Manchester specifically.

4.0 What do the Modifications mean for the overall aims of the Plan

- 4.1 Whilst there are a large number of proposed modifications, including amending the plan period from 2020 to 2037 to 2022 to 2039, they do not change the overall Vision, Objectives and Spatial Strategy of the plan. The Inspectors consider that the proposed modification to the Plan period is necessary to make the plan sound to ensure that, in line with Government Policy, the PfE Strategic policies look ahead over a minimum 15 year period from adoption and thus provide sufficient policy framework for the individual local plans which will follow on from the PfE’s adoption.

Spatial Strategy

- 4.2 The spatial strategy remains to deliver sustainable, inclusive growth with the following spatial elements;
- Significant growth in jobs and housing at the core – continuing development in the ‘core growth area’ encompassing the city centre and beyond to the Etihad in the east, through to the Quays, Trafford Park and Port Salford in the west. The majority of commercial employment growth is proposed in this area and around 50% of overall housing supply is found here and, in the wards, immediately surrounding it (inner areas).

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

Jobs

- 4.3 Economic prosperity remains central to the overall strategy. It is essential to raising incomes, improving health and quality of life, and providing the finances to deliver better infrastructure, services and facilities. PfE continues to attract investment in our city and town centres alongside recognising the importance of investing in strengthening existing and creating new employment locations, so that all communities are able to contribute to, and benefit from, growth.
- 4.4 In order to achieve the economic growth, the plan sets a global target for the nine authorities of just over 2 million sq.m. of new office floorspace and just over 3,500,000 sq.m. of industrial and warehousing floorspace over the plan period. These figures have been modified to reflect the revised plan period, and will inform the preparation of district local plans.

Homes

- 4.5 Greater Manchester is facing a housing crisis. Although the Greater Manchester authorities have built more houses in recent years, wages have not been keeping pace with property price increases and affordability issues have intensified. To address the supply side, Government policy sets out a standard methodology for calculating local housing needs to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. This standard methodology remains Government policy and the Inspectors did not consider there were exceptional circumstances to deviate from using it, in the case of the PfE Plan. Therefore, the PfE still identifies that around 10,300 (10,305) homes are required per annum. However, as a result of the change to the Plan period, the number of homes to be delivered over the lifetime of the plan has increased from just under 165,000 to just over 175,000 (175,185) new homes. The plan also continues to support Greater Manchester's commitment to deliver more affordable housing including ones for social or affordable rent. Local plans will set targets for the provision of affordable housing based on evidence relating to need and viability.

Environment

- 4.6 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.

- 4.7 The Plan supports the important role of our natural assets by:
- Taking a landscape scale approach to nature restoration;
 - Seeking to protect and enhance our network of green and blue infrastructure;
 - Seeking a significant overall enhancement of biodiversity and geodiversity; and
 - Seeking to maintain a new and defensible Green Belt which will endure beyond the plan period.
- 4.8 Furthermore, the plan supports wider strategies around clean air, walking and cycling and underpins Greater Manchester's ambition to be a carbon neutral city-region by 2038. A key element of this remains that there is an expectation that all new development to be net zero carbon by 2028.

Brownfield land preference

- 4.9 There remains a strong focus in the plan on directing new development towards sites within the existing urban area, which are often in sustainable locations, close to facilities and served by existing infrastructure. Maximising the use of land in the urban area enables us to minimise the release of greenfield and Green Belt land for development. The land supply identified for development in the plan is largely within the urban area:
- Offices - 98%
 - Industry and Warehousing- 51%
 - Housing - 90%
- 4.10 There are significant viability issues in parts of the conurbation and there is a need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The Brownfield Housing Fund is targeted at Combined Authorities and begins to help to address viability issues, but it is not enough to enable the full potential of our brownfield land supply to be realised.

Green Belt

- 4.11 The PfE Plan includes a limited release of Green Belt for both housing and employment. The net loss of Green Belt proposed is 2,213 hectares. This compares to a net loss of 1,754 hectares in the PfE 2021 Plan. Although the net loss is higher than that in the PfE 2021 Plan, this is not as a result of more land being proposed for release by the introduction of further development allocations. Instead, it is due to the fact that the Inspectors concluded that exceptional circumstances existed to justify only 18 of the 49 proposed Green Belt Additions and therefore only those 18 Green Belt Additions could remain in the plan and thereby contribute to the area covered by Green Belt. In concluding that exceptional circumstances had not been fully evidenced and

justified for each of the other 31 proposed Green Belt Additions, including one which is almost 200 hectares in size, the overall net let loss of Green Belt, taking account of the Green Belt releases and additions, compared against the previously adopted Green Belt boundary is greater than it would have been had the inspectors concluded that all 49 Green Belt Additions were fully evidenced and justified. The reduction in the Green Belt Additions as proposed by the Inspectors does not, however, impact on the delivery of the overall Vision, Spatial Strategy and Strategic Objectives of the Plan.

- 4.12 The Policies in the Plan would result in the overall extent of the nine authorities' Green Belt reducing by 4.1%. The previously adopted Green Belt covers almost 47% of the land covered by the nine authorities. The Policies in the PfE Plan would reduce this to just under 45% of the PfE authorities remaining as designated Green Belt.

5.0 What do the Modifications mean for Manchester

- 5.1 The Plan continues to feature specific policies and an allocation that directly relate to Manchester including:

- Delivery of a minimum of around 60,000 new homes; and over 2 million square metres of office floorspace in Manchester by 2039;
- Policies to deliver growth and regeneration across the City
- Seeking to achieve a carbon neutral city no later than 2038;
- Inclusion of the requirement to deliver biodiversity net gain in line with national policy;
- Policies across a range of other themes including flood risk, water resources, air quality, economic and housing matters, heritage, culture, education and skills, health, and sport and recreation; and
- Specific allocation identified in the plan for Manchester for new jobs at Wythenshawe Hospital.

- 5.2 The housing and employment figures in the main modifications reflect that fact that the plan has been extended to a period from 2022 to 2039 meaning an additional year of housing and employment development has been included. This is required to ensure the adopted plan has a 15-year time horizon previously explained at paragraph 4.1.

- 5.3 As previously noted in paragraph 2.8, the Inspectors have recommended the deletion of the proposed allocation at Global Logistics (see Further Action Points note IN36 in the Examination Library). The Inspectors reasons for the deletion of the allocation are reproduced below:

“The scale of floorspace delivered would not be significant in terms of the overall employment supply; neither would it provide substantial qualitative benefits through its proximity to the airport. Accordingly, the site would make a very limited contribution to the overall economic strategy. Given the size and constrained nature of the site, we are also not persuaded that the requirements of the policy would be sufficient in this case to ensure the delivery of a satisfactory form of development. This is particularly the case in

relation to biodiversity assets in and around the site, including the effects on the mitigation measures already identified for the adjacent development. Notwithstanding the overall moderate harm identified to the Green Belt, we therefore do not consider that exceptional circumstances have been fully evidenced and justified for the release of this site from the Green Belt, contrary to paragraph 140 of the NPPF. Reducing the allocation to areas outside the Green Belt would not overcome our concerns relating to potential effects of development and a satisfactory form of development.

AP144. GMCA to prepare main modifications which delete policy JPA10 from the Plan, along with any consequential changes to other policies, reasoned justification and maps.”

6.0 Relationship with Manchester Local Plan

6.1 The Places for Everyone Plan is the strategic spatial plan for the nine constituent boroughs and as such sets out a collective planning policy framework. All policies within the plan are "strategic policies". It is being prepared as a Joint Development Plan Document of the nine local planning authorities. Once the Places for Everyone Plan is adopted it will form part of Manchester's development plan. As such Manchester's local plan will need to be consistent with it and any neighbourhood plans will need to be in general conformity with the strategic policies.

6.2 The evidence that underpins the Places for Everyone Plan will also inform Manchester's local plan but, as a strategic plan, it does not cover everything that the local plan would. Therefore, Manchester's Local Plan will set out more detailed policies including both strategic and non-strategic policies, as appropriate, reflecting local circumstances. Appendix A of the PfE Plan sets out the policies in the relevant adopted GM district local plans which will be replaced by the Places for Everyone Plan.

6.3 Manchester's local plan will be expected to look ahead a minimum period from its adoption, in line with national policy. In amending the plan period from 2020 to 2037 to 2022 to 2039 the PfE Plan should provide an appropriate strategic policy framework for the local plan which will be produced, following its adoption. However, in the event that the local plan looks beyond 2039, the minimum requirement figures set out in Policies JP-J3, JP-J4 and JP-H1 should be used to inform local plan target(s).

7.0 Integrated Assessment and Habitats Regulations Assessment

7.1 As part of the development of the PfE Plan, 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.
- 7.2 The IA contributed to the development of the PfE through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.
- 7.3 A Habitats Regulations Assessment (HRA) refers to several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it.
- 7.4 All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. If a proposed plan or project is considered likely to have a significant effect on a protected habitats site (either individually or in combination with other plans or projects) then an Appropriate Assessment of the implications for the site is required.
- 7.5 The PfE2021 was assessed as a Plan which was considered likely to have significant effect on one or more European protected site and was therefore informed (and accompanied) by an HRA with mitigation measures identified as appropriate.
- 7.6 The Inspectors have made it clear that the modifications they have decided should be made to the Plan should be subject to sustainability appraisal and Habitat Regulations Assessment as appropriate. Furthermore, the Inspectors have made it clear that the sustainability appraisal and Habitat Regulation Assessment reports will be subject to public consultation, alongside the modifications, before the end of the examination. Accordingly addendums have been produced for both the IA (incorporating the sustainability appraisal) and the HRA, assessing the impact of the modifications.
- 7.7 With respect to the sustainability appraisal, where individual policy scores have moved from positive to uncertain or neutral, the SA acknowledges that when the plan is read as a whole, the topic is covered in other relevant policies and therefore no residual impacts have been recommended.
- 7.8 The outcome of the HRA screening assessment is that there are no “Likely Significant Effects” on European sites, other than those identified in the Submission version HRA. Therefore, it has not been necessary to amend the PfE Appropriate Assessment as a result of the proposed main modifications.
- 7.9 The IA and HRA addendum reports are available alongside this report and will be published alongside the main modifications schedule.

8.0 Evidence Base

- 8.1 A comprehensive evidence base was assembled to support the policies and proposals in the PfE Plan which was made available for consultation in 2021. This evidence was submitted alongside the PfE Plan in February 2022 and has remained available on the GMCA's website since then and throughout the examination. As one of the tests of soundness is whether a plan is "justified – ...based on proportionate evidence", the Inspectors considered this evidence as part of their Examination into whether, or not, the PfE Plan is "sound". As detailed above, this evidence base will also be used to inform Manchester's local plan.

9.0 Status of NPPF Proposed Changes

- 9.1 In December 2022 the Government consulted upon a number of changes to the National Planning Policy Framework (NPPF). The consultation ran from 22 December 2022 to 2 March 2023. The consultation sought views on a proposed approach to updating NPPF whilst at the same time seeking views on proposals to prepare National Development Management Policies, how policy could be developed to support levelling up, and how national planning policy is currently accessed by users.
- 9.2 The Inspectors made a statement that in light of the transitional arrangements (contained within the draft NPPF changes), they would carry on with the examination as programmed in the context of the tests of soundness set out in current NPPF, published in 2021.
- 9.3 The Government is still analysing the feedback, therefore the draft, as proposed to be changed, version of the NPPF cannot be used to determine whether a Plan is "sound"; accordingly it would be unlawful to propose any "main modification" to PfE and/or withdraw from PfE, on the basis of the draft proposed changes to the NPPF. This is especially the case given that PfE is at such an advanced stage of preparation.
- 9.4 As the Department for Levelling Up, Housing, and Communities is currently analysing the feedback to the consultation and no changes to the NPPF have yet been published, the examination progressed through its scheduled programme of sessions. The Inspectors duly issued their post hearings' letter with the schedule of proposed main modifications that they consider are necessary to make the plan sound and/or legally compliant and which should therefore be made available for a period of public consultation.
- 9.5 The schedule of main modifications, which is available alongside this report, represents those changes to the plan that the inspectors consider are necessary. They do not include any modifications on the basis of the draft proposed changes to the NPPF. To make further changes to the schedule, e.g. amending overall development targets, removing additional sites which PfE proposes to take out of the Green Belt and/or amending the Green Belt Addition sites, on the basis of the consultation draft NPPF would not be lawful.

10.0 Previous Consultation

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

11.0 PfE Modifications Consultation

- 11.1 At this modifications' consultation stage, whilst anyone can make a representation, the PINS Procedure Guide for Local Plan Examinations (<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>) makes it clear (at section 6) that the consultation is only about the proposed main modifications and any policies map changes and no other aspect of the plan.
- 11.2 Whilst it is only necessary to consult on the Main Modifications and any related policy map changes, it is proposed to consult on all modifications so that the overall proposed changes to the plan are clear. The Inspectors will, however, only consider comments received to the Main Modifications; the nine PfE authorities will consider those comments relating to the additional modifications.
- 11.3 As with the Regulation 19 consultation, the consultation will be hosted by the GMCA, with the consultation being carried out in line with the requirements of the relevant authority's Statements of Community Involvement and the guidance contained in the above mentioned PINS guidance note. The guidance note states that "the nature and duration of the consultation should reflect that of the consultation held at Regulation 19 stage, where appropriate. This means it should last at least six weeks." However, as the Regulation 19 consultation ran for eight weeks, it is considered appropriate to reflect that in the duration of the modifications' consultation. Therefore, it is proposed that the consultation would run for a period of eight weeks.
- 11.4 Manchester's Statement of Community Involvement (SCI) specifically states that at main modifications stage,

“The Inspector may recommend changes to the Local Plan to make it sound and / or legally compliant. The changes are called 'main modifications' and we will consult on these and forward the responses to the Inspector for consideration. At the same time we may put forward our own 'additional modifications' to deal with more minor issues. There is no legal requirement to consult on the additional modifications but we will usually consult on these alongside the main modifications.”

- 11.5 The SCI identifies at Picture 4.1 that at the main modifications consultation stage, the primary means of contact will be via information on the Council's website, and notification of consultees on our Local Plan database either by email or letter. Hard copies of the consultation documents will be placed in the Central Library and site notices will be erected around the remaining allocation proposal at Medipark.

12.0 Next Steps

- 12.1 Following the conclusion of the consultation, the representations received will be forwarded to the Programme Officers along with a report listing all of the representations; a summary of the main issues raised; and a brief response, on behalf of the nine districts, to those main issues.
- 12.2 The Inspectors will consider all the representations made on the proposed MMs before finalising the examination report and the schedule of recommended MMs. Further hearing sessions will not usually be held, unless the Inspectors consider them essential to deal with substantial issues raised in the representations, or to ensure fairness.
- 12.3 When deciding whether or not to recommend that the local planning authorities should make the MMs, the Inspectors will normally consider them in the form in which they were published for consultation. However, in some limited circumstances, the responses to consultation may lead the Inspector to consider that a new MM, or an amendment to one that has already been consulted on, is also necessary to make the plan sound or legally compliant; or that a proposed MM is not in fact necessary for soundness and should not be recommended. The Inspectors may only recommend such changes to the MMs without further consultation if they are satisfied that no party would be prejudiced as a result. For example, the consultation already undertaken on the MMs might have adequately addressed the point, or the amendment might be a very minor one. Should further consultation be necessary a further report will be presented to the nine authorities for approval. Alternatively, if the Inspectors consider that no further consultation is necessary following the modifications' consultation (which is the subject of this report), the ultimate decision to adopt must be taken by each of the Full Councils of the nine participating local authorities. This will be the subject of a further report at the appropriate time.

13.0 Recommendations

13.1 The Executive is recommended to:

- (1) Note progress made in respect of the Places for Everyone Plan (PfE).
- (2) Agree that the PfE modifications (Main, Additional and those relating to the policies map), and associated supporting background documents be subject to a period of representations for a period of 8 weeks commencing no earlier than 9 October 2023; and
- (3) Agree the next steps for the production of the PfE Plan (section 12).