



## Planning & Housing Commission

Date: 15 January 2024

Subject: Planning (Places for Everyone) update

Report of: Steve Rumbelow Portfolio Lead Chief Executive for Housing, Planning and Homelessness

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### Purpose of Report

To update members on the outcome of the recent consultation on proposed modifications to the plan and the implications of the recently published National Planning Policy Framework.

### Recommendations:

Planning and Housing Commission is requested to:

1. Note the report

### Contact Officers

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### Equalities Implications

The Places for Everyone Publication Plan is a statutory plan which seeks to contribute to the achievement of sustainable development, delivering economic, social and environmental benefits together in a mutually reinforcing way. It is informed by an Integrated Appraisal which includes an Equalities assessment.

### Equalities Impact, Carbon and Sustainability Assessment:

The Places for Everyone Publication Plan will provide the strategic planning policy framework to support the nine districts in meeting Greater Manchester's ambition to be carbon neutral by 2038. It is informed by an Integrated Appraisal which includes a

Strategic environmental Assessment., a Sustainability Appraisal, Health Impact assessment and equality Impact Assessment.

## **Legal Considerations**

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.

## **Financial Consequences – Revenue**

The preparation and examination of the Places for Everyone Publication Plan 2021 generated a revenue cost for 9 local authorities. A substantial evidence base was assembled to support the plan which involved the commissioning of specialist and independent experts. Following the submission of PfE to the Secretary of State, the independent examination began (and remains open until the Inspectors issue their final report). Further revenue costs associated with the examination process have included the appointment of a Programme Officers, the cost of the examination itself, including the procurement of the venue, Planning Inspectors and legal advice/representation. There are no current revenue implications.

## **Financial Consequences – Capital**

There are no capital consequences identified.

**Number of attachments to the report: 0**

## **Comments/recommendations from Overview & Scrutiny Committee**

N/A

## **Background Papers**

[\(Public Pack\)AGMA Supplemental Agenda Agenda Supplement for AGMA EXECUTIVE BOARD, 11/12/2020 13:00 \(greatermanchester-ca.gov.uk\)](#)

[\(Public Pack\)AGMA Executive Board - 12.02.21 Complete agenda pack Agenda Supplement for AGMA EXECUTIVE BOARD, 12/02/2021 00:00 \(greatermanchester-ca.gov.uk\)](#)

<https://democracy.greatermanchester-ca.gov.uk/ieListDocuments.aspx?CId=412&MId=4578&Ver=4>

<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/previous-stages/places-for-everyone-2021-regulation-19/the-plan-2021/district-governance-meetings/>

<https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/>

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

## **Tracking/ Process**

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

No

### **Exemption from call in**

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

No

### **GM Transport Committee**

N/A

### **Overview and Scrutiny Committee**

N/A

## **1. Background**

1.1 Following the withdrawal of Stockport MBC from the GMSF, the remaining nine GM authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) decided to progress a joint plan of the nine and this became known as “Places for Everyone” (PfE). In July 2021, the 9 authorities approved the PfE plan for consultation (the ‘Publication’ stage) and submission to the secretary of state following that consultation (provided no substantive main issues arose during the consultation). The Publication stage consultation ran from August 9, 2021, for 8 weeks, ending on October 3, 2021. Over 3,800 individuals and organisations responded during that consultation stage.

1.2 All representations, together with the Regulation 19 PfE plan and supporting background documents were submitted to the Secretary of State on February 14 2022, known as the “Submission” stage. This marked the beginning of the independent examination into the plan, which is the final stage in the plan making process.

## **2. The Examination**

2.1 Three inspectors were appointed to hold the examination and the hearing sessions on the plan ran from November 2022 to March 2023, with one further hearing day in July 2023.

2.2 Throughout the examination, the Inspectors raised questions that were prompted by their review of the plan and 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 in Manchester, close to the Airport (JPA10 – Global Logistics), and one in Salford (JPA28 – North of Irlam Station), 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.

2.3 In August 2023, the Inspectors issued a note IN39, (<https://www.hwa.uk.com/site/wp-content/uploads/2023/02/IN39-Next-Steps-Sept-2023.pdf>) which concluded:

“ ...we are satisfied at this stage of the examination that all of the proposed main modifications contained in the above documents are necessary to make the Plan sound and/or legally compliant, and would be effective in that regard. ...When they are in a position to do so, GMCA should publish the documents referred to above for public consultation. The nature and duration of the consultation exercise should reflect that of the consultation held under regulation 19.”

## **3. Main Modifications consultation**

3.1 The main modifications consultation took place between 11 October and 6 December. 174 responses were received. Work is underway to analyse these responses and prepare a report for the inspectors, summarising the main issues raised. This report and all of the responses will be sent to the Inspectors who will consider next steps.

3.2 There are 3 potential outcomes of this next stage:

- The Inspectors do not consider that the consultation responses raise any new substantive issues and there are no other new issues (e.g., changes to national policy) which affect the plan, and it is found sound with recommended modifications.
- The Inspectors consider that the consultation raises and or any new issues require further work/hearing sessions and /or further consultation.
- The Inspectors consider that the plan is unsound, even with the proposed modifications.

3.3 One of the issues the Inspectors will consider, is whether there are any 'new' issues which have arisen since the examination hearings which impact upon the plan. One key issue is changes to national policy, and a revised National Planning Policy Framework (NPPF) was published on 19 December.

[https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf)

3.4 A briefing note is attached to this report as Appendix 1, outlining the main changes, however in terms of PfE, the provisions in paragraph 230 ('transitional arrangements') apply:

"The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (presubmission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements. ....Where plans or strategies are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan or strategy produced for the area concerned" (NPPF paragraph 230)

3.5 The 'presubmission' stage referred to is the Regulation 19 or 'Publication' stage. The PfE plan consulted on the Publication stage in August 2021, therefore it will continue to be examined under the relevant previous version of the Framework and is unaffected by the plan-making changes in the December 2023 version.

## **4. Conclusions and recommendations**

- 4.1 It is anticipated that the consultation responses will be published in early January and the consultation summary report will be submitted to the Inspectors in January. A further update will be provided once there is certainty over the next steps and timetable.
- 4.2 Recommendations are found at the front of the report.

**NATIONAL PLANNING POLICY FRAMEWORK (NPPF)  
BRIEFING  
15 JANUARY 2024**

## **INTRODUCTION**

The NPPF contains the national planning policy for England and Wales. It sets out how local plans should be made and how planning applications should be determined. It is not law, but as national policy it is given significant weight in planning decisions, meaning that it is one of the most important planning documents for applicants to consider when devising their schemes.

The Framework can be found at this link:

[https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPFDecember\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPFDecember_2023.pdf)

The NPPF was first introduced in 2012 and has been revised several times, most recently on 19 December 2023 (as amended) following consultation in December 2022. A variety of proposed changes were identified in relation to plan making and decision taking.

This note sets out:

1. Where the NPPF has been taken forward largely or entirely as proposed last year
2. Changes which have been modified or no longer taken forward in their original form
3. Changes which are identified as being the subject of further consultation
4. Points from the first consultation which have already been answered or responded to

### **1. Where the NPPF has been taken forward largely or entirely as proposed last year**

- Authorities with an up-to-date local plan will no longer need to continually show a deliverable five-year housing land supply.
- Councils will no longer have to provide five-year housing land supply buffers of 5 per cent or 10 per cent.
- Local planning authorities can include historic oversupply in their five-year housing land supply calculations.
- Authorities with emerging local plans will benefit from a reduced housing land supply requirement.
- Protection against development that conflicts with neighbourhood plans has been extended to older such plans.
- The new NPPF confirms that the standard method for calculating housing need is an “advisory starting point” for local authorities in generating housing numbers.
- More explicit indications are given of the types of local characteristics which may justify the use of an alternative method of assessing housing need.
- The NPPF retains the uplift of 35 per cent to the assessed housing need for the 20 largest towns and cities in England.
- Authorities will be expected to take particular care to ensure that they meet need for retirement housing, housing-with-care and care homes.
- Authorities will be encouraged to use planning conditions to require clear details of a scheme’s design and materials.

- The section promoting mansard roof extensions stays in the final version
- The availability of land for food production should be considered when allocating agricultural land for development.
- The NPPF is amended with a new paragraph 164 to give “significant weight” to the importance of energy efficiency through adaptation of buildings.
- The starting point for creating National Development Management Policies (NDMPs) will be existing national policy on development management.

## **2. The changes which have been modified or no longer taken forward in their original form**

- The NPPF makes clear that local authorities are not required to review their green belt boundaries during plan-making, but does not explicitly link this issue to housing supply.
- Suggested changes to paragraph 11 which would have meant that the need to avoid development seen as “uncharacteristically dense” for an area would have outweighed the requirement for authorities to meet local housing need have been dropped.
- The government has dropped plans to allow councils to be able to take past over-delivery of housing into account when assessing housing need as part of plan-making.
- The proposal to remove the need for plans to be ‘justified’ as part of the test of soundness required for local plans to be adopted has been dropped.
- NPPF includes a new clause in paragraph 70 instructing authorities to support small sites to come forward.
- NPPF includes a change effectively dropping the previously existing “entry-level exception sites policy” and replacing it, in paragraph 73, with an exception site policy for community-led housing and includes a new definition of ‘community-led development’ in the glossary contained within Annex 2 of the Framework.

## **3. Changes which are identified as being the subject of further consultation**

- Review of the standard method utilising census 2021 information (not before 2025)
- The new framework does not proceed with reforms which would have meant that evidence of sufficient deliverable permissions would have saved councils from Housing Delivery Test sanctions.
- Past “irresponsible planning behaviour” by applicants could in future be taken into account when applications are being determined.
- Government to push ahead with measures designed to speed up build out of sites, but only after further consultation.
- The government will continue to consider the proposal that planning for provision of social rent homes be given higher priority in the NPPF.
- Government to explore how small-scale interventions for nature can be promoted in any future updates to the National Planning Policy Framework.
- The possibility of embedding a broad form of carbon assessment in planning policy will be explored in a future review of national planning policy.
- Plans to review policy for climate change adaptation and flood-risk management are also delayed.



#### **4. Points from the first consultation which have already been answered or responded to**

- Proposed changes to the NPPF text around onshore wind power schemes to enable sites that have not been designated in the local plan to be approved have already been confirmed.
- The intended timeline for changes and transitional arrangements for the move to the new local plan system had already been confirmed this summer.