

Planning & Housing Commission

Planning Update
9 October 2024

Overview

- Places for Everyone update
- Supplementary Planning Documents
- National Planning Policy Framework consultation

Places for Everyone

- Plan adopted by the 9 local authorities and took effect 21 March 2024
- Legal challenge from Save the Greater Manchester Green Belt Ltd – 5 grounds, one ground given permission (Ground 5 Green Belt Additions)
- Hearing to renew permission on other 4 grounds to be held 23 October
- Hearing date for Ground 5 to be set after the 23 October 2024
- Places for Everyone remains fully in force as part of the development plans of the 9

Supplementary Planning Guidance

- Now that PfE is adopted the authorities are implementing the policies
- This includes bringing forward supplementary planning documents (SPD) to support policies
- Two draft SPDs have been prepared and will be out for public consultation in November 2024:
 - Holcroft Moss Planning Obligations SPD
 - South Pennine Moors SPD
- The GMCA will host the consultation on behalf of the nine PfE authorities
- The consultation responses will inform the final iteration of the SPDs
- It is hoped they will be adopted by the nine authorities in spring 2025

Holcroft Moss SPD

- Holcroft Moss lies within Warrington and within the Manchester Mosses Special Area of Conservation (SAC)
- The SPD provides guidance on implementation of Criterion 17 of Policy JP-C8 of the PfE Plan which seeks to avoid adverse impacts on the protected habitats and species of Holcroft Moss
- The need for the policy arose out of the Habitats Regulations Assessments (HRA) for both the Warrington Local Plan and the PfE Plan and relates to the potential cumulative harm from development in both plans
- The policy relates to the whole plan area but is triggered only by certain development:
 - Development that would result in increased traffic flows on the M62 past Holcroft Moss of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day
- The SPD will assist the nine PfE Plan authorities in securing contributions from developers to mitigate impacts of schemes on Holcroft Moss

South Pennine Moors SPD

- This SPD provides guidance on the implementation of criterion 7 (parts a and b) of Policy JP-G5 of PfE
- The need for the policy arises out the conclusions of the PfE HRA
- Unlike the Holcroft Moss SPD, this SPD relates only to Oldham, Rochdale and Tameside
- The aims of the SPD are to:
 - Provide advice as to what development within 400m of the South Pennine Moors boundaries may be considered acceptable
 - Provide advice as to the type and scope of assessment required to determine if development sites within 2.5km of the South Pennine Moors SPAs provide foraging habitats for qualifying bird species, and set out the types of applications that would require an assessment.

NPPF and other planning policy changes consultation

- Published 30 July 2024
- Consultation ran until 24 September 2024
- 106 questions – some about policy changes and some about specific wording changes in NPPF and LHN methodology
- Response can be found here:

[Shaping National Policy - Greater Manchester Combined Authority
\(greatermanchester-ca.gov.uk\)](https://greatermanchester-ca.gov.uk)

NPPF consultation headlines

- New methodology to calculate housing need
- Significantly higher housing figures
- Affordable housing
- Transport modelling
- Changes to Green Belt policy – Grey Belt, viability, CPO
- Renewable energy
- Sub regional planning
- Planning fees

Local Housing Need

- Introduces new Local Housing Need (LHN) methodology (based on housing stock/affordability) to support manifesto commitment to build 1.5m homes over the Parliamentary term.
- LHN increases targets by more than 30% across Mayoral Combined Authorities – additional 3,500 pa (2,700 pa more for PfE).
- Clarifies that all local authorities should seek to meet their housing need in full, and that unmet housing need constitutes ‘exceptional circumstances’ to release Green Belt sites.
- Inability to deliver the LHN triggers the “presumption in favour of development” to support housing growth.

Existing* Targets vs New LHN results

	Existing annual average	New	Change	% Change	Change compared to delivery 2021/2022/23	Change compared to delivery 2021/2022/23
Bolton	787	1,340	553	70%	688	105%
Bury	452	1,054	602	133%	789	298%
Manchester	3,533	2,686	-847	-24%	-442	-14%
Oldham	680	1,049	369	54%	580	124%
Rochdale	616	1,031	415	67%	439	74%
Salford	1,658	1,475	-183	-11%	-1,173	-44%
Stockport	1,097	1,906	809	74%	1,369	255%
Tameside	485	1,223	738	152%	798	188%
Trafford	1,122	1,607	485	43%	803	100%
Wigan	972	1,572	600	62%	202	15%
PfE Total	10,305	13,037	2,732	27%	2,683	26%
GM Total	11,402	14,941	3,539	31%	4,052	37%

Affordable housing

- Removes the requirement for ‘at least 10% of the total number of homes to be available for affordable home ownership’ and the requirement that a minimum of 25% of affordable housing units secured through developer contributions should be First Homes.
- Propose setting an expectation that housing needs assessments explicitly consider the needs of those requiring Social Rent and that authorities specify their expectations on Social Rent delivery as part of broader affordable housing policies.
- It is expected that many areas will give priority to Social Rent in the affordable housing mix they seek, in line with their local needs, NPPF will not be prescriptive; it is for local leaders to determine the balance that meets the needs of their communities.

Transport modelling

- Change from 'predict and provide' to a 'vision-led' approach focusing on desired outcomes and planning to achieve them
- Aligns with DfT Circular 01/2022, Transport 2040 and the approach in PfE
- Adopting a vision led approach offers the opportunity for more positive and integrated transport and land use planning with more meaningful application of the modal hierarchy, making sustainable modes central to achieving the vision for development rather than a residual consideration.
- Experience has illustrated that there is considerable uncertainty within the industry of how vision led planning should work towards more positive transport outcomes.
- Concerns that mitigation will still be focused too much around highways solutions

Green Belt

- Introduction and definition of “Grey Belt” – previously developed land within the Green Belt, or land which makes limited contribution to Green Belt purposes
- All local authorities to review Green Belt to identify “Grey Belt” land
- Grey Belt land only suitable for development if in ‘sustainable locations’
- Golden rules for Green / Grey Belt sites, including 50% affordable housing (where viable)
- New approach to viability for Green Belt sites – benchmark land value
- New approach to Compulsory Purchase Orders compensation in the Green Belt – ‘hope value’ would reflect the ‘golden rules’, potential for ‘no hope value’ compensation

Renewable energy

- Increased support for renewable energy schemes
- Committed to radically increasing onshore wind energy by 2030. On 8 July, the Chancellor announced that footnotes 57 and 58 to paragraph 163 of the existing NPPF, which placed additional tests on onshore wind schemes would no longer apply to decisions.
- Proposing amendments to direct decision makers to give significant weight to the benefits associated with renewable and low carbon energy generation, and proposals' contribution to meeting a net zero future. This aims to increase the likelihood of local planning authorities granting permission to renewable energy schemes and contribute to reaching zero carbon electricity generation by 2030.
- Further amendments set a stronger expectation that authorities proactively identify sites for renewable and low carbon development when producing plans, where it is likely that in allocating a site, it would help secure development
- Changing thresholds at which solar and onshore wind projects are considered Nationally Significant Infrastructure which 'could ensure' that projects are required to follow a proportionate process to secure consent through the local planning system, given they are less complex and geographically spread out, could result in faster consenting, and at lower cost

Sub regional strategic planning

- Government will legislate in the Devo bill for universal coverage of strategic planning
- Based on Mayoral Combined Authority powers GM MCA already has this power
- Any 'review' of PfE would trigger a decision on preparation of a Spatial Development Strategy
- No intention there will be a change to the regulations to allow for allocations / designations but would need to set a housing requirement for constituent authorities
- Would be based on revised NPPF (if adopted)

Planning fees

- Proposals to raise planning application fees to cover costs
- Introduce statutory cost recovery for Nationally Significant Infrastructure Projects
- GM LAs have answered these questions individually

Implications for GM local plans

- PfE is a 'Local Plan Part 1' plan and provides housing targets for PfE districts:
 - Provided an individual authority's local plan "does not introduce new strategic policies setting the housing requirement" it would constitute "a Part 2 plan" and as such would be based on taking forward the individual authority's housing requirement as set out in PfE Table 7.2.
 - If on the other hand an individual authority decided to set a new housing requirement different from that found in PfE Table 7.2 it could only do that by "introducing new strategic policies setting the housing requirement" and as such the local plan would have to be based on the new standard method
- Stockport local plan will need to prepare a local plan in compliance with revised NPPF when published

GM response

Mainly supportive but some concerns/issues:

- LHN methodology –concern about disconnect from demographic projections
- Benchmark land value for Green Belt sites
- Approach to CPO in Green Belt
- Grey belt – sustainability implications
- Transport modelling – car dependent solutions