

## **TRAFFORD COUNCIL**

**Report to: Council**

**Date: 20<sup>th</sup> March 2024**

**Report for: Decision**

**Report of: Executive Member for Economy and Regeneration**

### **Report Title**

**Adoption of Places for Everyone Plan: A Joint Development Plan Document for nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) 2022-2039 (The Places for Everyone Plan).**

### **Summary**

**This report seeks the approval of Council to formally adopt The Places for Everyone Plan - incorporating the Main Modifications, amendments to the Policies Map and Additional Modifications - in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (“2012 Regulations”) and the Planning and Compulsory Purchase Act 2004 (as amended) (“2004 Act”).**

### **Recommendation(s)**

**It is recommended that the Council:**

- (i) Accept the findings of the Inspectors’ Report and approve the Main Modifications to the Places for Everyone Joint Development Plan Document proposed by the independent Inspectors, as set out in Appendix 1.1 and 1.2 to this report, for incorporation into the final version of the Places for Everyone Joint Development Plan Document.
- (ii) Approve the amendments to the Places for Everyone Joint Development Plan Document Policies Map, as set out in Appendix 2 to this report, for incorporation of all the changes which relate to Trafford’s administrative area into the Composite Policies Map.
- (iii) Approve the Additional Modifications to the Places for Everyone Joint Development Plan Document, as set out in Appendix 3 to this report, for

incorporation into the final version of the Places for Everyone Joint Development Plan Document.

- (iv) Adopt the Places for Everyone Joint Development Plan Document 2022 – 2039 (provided in Appendix 4), with effect from 21 March 2024 – incorporating the Main Modifications and Additional Modifications – as part of the Development Plan for Trafford, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 (as amended)
- (v) Adopt the Policies Map (Appendix 5) which incorporates the Modifications to it (Appendix 2) and is necessary to give effect to the policies of the Places for Everyone Joint Development Plan Document.
- (vi) Delegate authority to the Corporate Director of Place to make any minor non material editorial amendments to the Places for Everyone Joint Development Plan Document and Policies Map ahead of its final publication, subject to consultation and agreement with the eight other Places for Everyone authorities. These amendments will be limited to correcting minor errors and formatting text.

Contact person for access to background papers and further information:

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#### Appendices:

Due to the large sizes of the various appendices these will be viewable on the [GMCA website](#).

- Appendix 1.1: Inspectors' Report (Document 1 of 2)
- Appendix 1.2: Inspectors' Report Appendix - Main Modifications to the Plan (Document 2 of 2)
- Appendix 2: Schedule of Policies Map changes
- Appendix 3: Consultation Report into the Additional Modifications incorporating the Schedule of Additional Modifications
- Appendix 4: Places for Everyone Plan for Adoption
- Appendix 5: Places for Everyone Policies Map

- Appendix 6: Correspondence between the Mayor of Greater Manchester and the Secretary of State
- Appendix 7: Schedule of Policy number changes between the Submitted PfE Plan (SD1) and the PfE Plan being presented for Adoption
- Council Report Appendix A: Trafford Council Approvals Chronology Prior to Regulation 19 (July 2021)
- Council Report Appendix B: Inspection Locations in Trafford

Background Papers:

None.

Implications:

Relationship to Policy Framework/Corporate Priorities	The Places for Everyone Joint Local Plan (PfE) will provide the overall strategic planning context for Development Management and the Trafford Local Plan, which will contribute to all of the Council's Corporate Priorities, in particular addressing our climate crisis.
Relationship to GM Policy or Strategy Framework	PfE is being produced in partnership with the GMCA and nine GM LA's (excluding Stockport) and will be one the key strategic policy documents produced at the GM level.
Financial	<p>The costs of the preparation and examination of the Places for Everyone Plan 2021 are being shared by GMCA and the nine districts within the plan area. 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. Further revenue costs associated with the examination process included the appointment of Programme Officers, the cost of the examination itself, including the procurement of the venue, Planning Inspectors and legal advice/representation. Following adoption, further costs may be incurred in relation to the monitoring of the plan and also should the decision to adopt the Plan be legally challenged. For Trafford, any new costs are expected to be covered from Reserves that have been specifically earmarked.</p> <p>There are no current revenue implications.</p> <p>There are no capital consequences identified.</p>
Legal Implications	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

	<p>the Town and Country Planning (Local Planning) (England) Regulations 2012 (“2012 Regulations”) have been complied with.</p> <p>The joint DPD was 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 its submission to the Secretary of State, the joint DPD was published and representations were invited, pursuant to Regulation 19 and Regulation 20 of the 2012 Regulations. Following Submission, the Joint DPD was subject to independent examination, as prescribed by section 20 of the Act; the modifications consultation stage which took place between October and December 2023 fell within that stage of the plan preparation process. The Inspectors issued their report on 14 February 2024 which signals the end of the examination stage. It is now the case that the nine districts must either accept in full the recommendations in their report or reject them in full.</p> <p>In accordance with section 23 of the 2004 Act, the Places for Everyone Joint Local Plan must be adopted by a resolution of the full Council.</p> <p>As with all Local Plans, there is a risk that a legal challenge to the adoption of the PfE Plan will be lodged. The council cannot prevent a person or organisation lodging such a legal challenge, but (with GMCA and the other eight authorities) it has mitigated for this possibility to reduce the risk of a successful challenge significantly by ensuring that all proper legal powers and procedures associated with the preparation of a Joint Local Plan have been followed.</p>
Equality/Diversity Implications	The Places for Everyone 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.
Sustainability Implications	The Places for Everyone Plan is supported by a Sustainability Appraisal (SA), which assessed the plan against a number of economic, social and environmental indicators to ensure that future development will be sustainable.
Carbon Reduction	The Places for Everyone 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. The PfE plan chapter dedicated to Sustainable and Resilient Places contains several climate change and carbon reduction policies

	<p>against which all new developments will be assessed and expected to comply with, including:</p> <ul style="list-style-type: none"> <li>• Policy JP-S1: Sustainable Development, containing measures for reducing energy demand and increasing onsite renewable energy generation;</li> <li>• Policy JP-S2 Carbon and Energy, which sets out a range of methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies;</li> <li>• Policy JP-S3 Heat and Energy Networks, which sets out measures to deliver renewable and low carbon heat and energy schemes and identifies ‘Opportunity Areas’;</li> <li>• Policy JP-S4 Flood Risk and the Water Environment, which sets out water-based measures to adapt and reduce the impacts of climate change;</li> <li>• Policy JP-S5 Clean Air, which sets out a comprehensive range of measures to support improvements in air quality; and</li> <li>• Policy JP-S6 Resource Efficiency, which sets out measures to help achieve a circular and zero-waste economy.</li> </ul> <p>The Trafford allocations could also provide opportunities for decentralised, low carbon heat and energy networks. The PfE policies link to the Trafford Carbon Neutral Action Plan.</p>
Resource Implications e.g., Staffing / ICT / Assets	The Places for Everyone Plan is in part being produced by staff from within the Council’s Growth, Communities & Housing Service. The documents will be available to view electronically via the web. A small part of the allocations are on land or property owned by the Council.
Risk Management Implications	The Places for Everyone Plan is a key strategic planning document that will provide the context for the Trafford Local Plan. If it is not adopted it will impact on the scope and delivery of the Trafford Local Plan.
Health & Wellbeing Implications	The Places for Everyone Plan includes a number of policies which will encourage more people to make healthier choices in life, including promoting cycling and walking. It will therefore contribute towards improving the health and wellbeing of Trafford’s residents.
Health and Safety Implications	Not applicable

## **1.0 INTRODUCTION**

- 1.1 Every Council has a statutory duty to prepare a Local Plan, with a requirement set in law that planning decisions must be taken in line with the Local Plan unless material considerations indicate otherwise. Indeed, in a recent letter to the Mayor of Greater Manchester, the Secretary of State has reaffirmed his Government's dedication to a plan-led system and its role in ensuring housing requirements are planned for appropriately (Appendix 6). The Places for Everyone Plan: A Joint Development Plan Document for nine Greater Manchester Local Authorities (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) 2022-2039 (PfE) 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 PfE Plan is adopted it will form part of Trafford's development plan and will be used to assess individual planning applications. As such Trafford's Local Plan will need to be consistent with it and neighbourhood plans will need to be in general conformity with the strategic policies.
- 1.2 The PfE Plan is a strategic plan, and it does not cover everything that Trafford's local plan would. Therefore, Trafford'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.
- 1.3 Trafford'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 will provide an appropriate strategic policy framework for 1.3 Trafford's Local Plan which will be produced, following its adoption.

## **2.0 BACKGROUND**

2.1 In 2014 the 10 Greater Manchester local authorities resolved to prepare a joint development plan, known as Greater Manchester Spatial Framework (GMSF). Following the decision of Stockport council to withdraw 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). Before “submission” the PfE Plan had been the subject of various consultations<sup>1</sup> since its inception in 2014:

- November 2014 - Scope of the plan and the initial evidence base (Regulation 18 of the 2012 Regulations)
- November 2015 - Vision, strategy and strategic growth options (Regulation 18 of the 2012 Regulations)
- October 2016 –Draft Greater Manchester Spatial Framework (Regulation 18 of the 2012 Regulations)
- The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) (Regulation 18 of the 2012 Regulations)
- Publication version of Places for Everyone (Pre-Submission Consultation) 2021 (Regulation 19 of the 2012 Regulations)

2.2 Full details of the consultation undertaken, the key issues raised at each stage of consultation and how these issues have been taken into account in the plan making process up until submission, are set out in the Statement of Consultation 2022 which is available to view on the GMCA web site.

2.3 The PfE Plan was submitted to the to the Secretary of State on February 14, 2022, pursuant to Reg. 22 of the Local Planning Regulations (‘Submission stage’). This marked the beginning of the independent examination into the plan, the final stage in the plan making process. Three Inspectors were appointed to examine whether the submitted plan met the tests of soundness

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<sup>1</sup> [Places For Everyone - Documentation](#)

defined in the National Planning Policy Framework (NPPF)<sup>2</sup> and met all the relevant legislative requirements, including the duty to co-operate<sup>3</sup>.

- 2.4 The public hearing sessions started at the beginning of November 2022 and sat for 12 weeks in total, including a final session at the beginning of July 2023.
- 2.5 The Inspectors' post hearing note (IN39) was published on the examination website<sup>4</sup> on 11th August 2023, setting out their conclusions on the key issues of soundness and the Main Modifications that would be required to ensure the Plan was sound. A consultation on the Main Modifications was carried out for a period of 8 weeks, between 11 October and 6 December 2023. More detail on this consultation is provided in Section 3 below.
- 2.6 Having considered the consultation responses to the Main Modifications, the Inspectors' Report was published by the GMCA on behalf of the nine local authorities on 15 February 2024. The Report concludes that subject to inclusion of the Main Modifications, the Plan is sound, complies with all relevant legal requirements and provides an appropriate basis for the planning of the nine boroughs. The Inspectors are satisfied that where necessary the local planning authorities engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has been met.
- 2.7 It should be noted that the Council can only adopt the PfE Joint Development Plan Document if it incorporates all the Main Modifications as recommended by the independent Inspectors.

### **3.0 MAIN MODIFICATIONS**

3.1 The Inspectors' post hearing note (IN39) set out their conclusions on the key issues of soundness. In summary the Inspectors concluded that:

- No significant changes were required to the spatial strategy policies.

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<sup>2</sup> The tests of soundness in paragraph 35 of the NPPF require that the plan is positively prepared, justified, effective and consistent with national policy.

<sup>3</sup> 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.

<sup>4</sup> [Places For Everyone Joint DPD Examination Website](#)



- No significant changes were required in relation to the scale of distribution of employment and housing.
- Exceptional circumstances case was not made for release of Green Belt sites JPA10 (Global Logistics) and JPA28 (North of Irlam Station).
- Exceptional circumstances case was not made for 31 of the 49 proposed Green Belt Additions.
- Some Modifications were required to policy wording to ensure that they were consistent, removed duplication and were therefore effective.

- 3.2 A schedule of Main Modifications was prepared and agreed with the Inspectors. A schedule of 'Additional Modifications' was also prepared. These were amendments which were not required to address issues of soundness, for example typographical issues, but were included for completeness. The Inspectors have not considered the responses to the additional modifications, this is a role for the districts and a report summarising the responses is attached (Appendix 3). The additional modifications (taken together) do not materially affect the policies set out in the PfE Plan if it is adopted with the Main Modifications. A composite plan was prepared which showed the Main Modifications and Additional Modifications to help people understand the proposed changes and help them to respond to the consultation.
- 3.3 The Main Modifications underwent further Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment, which were consulted on, alongside the modifications themselves. All of the Main Modifications consultation documents are available to view on the GMCA website.
- 3.4 Following approval by all nine PfE authorities, (details of the individual meetings can be found on the GMCA website), the Modifications were published for a period of public consultation which ran for 8 weeks, from 11 October – 6 December 2023. 177 representations were received in total. A list of respondents is published on the examination website (see Examination document RMM1). All of the responses are available on the GMCA website.
- 3.5 A report listing all of the representations, a summary of the main issues raised and a brief response to those main issues was prepared and published on the examination website (see Examination document RMM2).
- 3.6 A 'Summary of Key Issues' report was also prepared and is available on the examination website (see Examination document RMM3). The main issues raised related to:
- Extension of the plan period
  - Relationship to district local plans
  - Cancellation of HS2

- Implications of proposed changes to National Planning Policy Framework
- Approach to Brownfield Land in Sustainable Development policy (JP-S1)
- Modifications to the Carbon and Energy policy (JP-S2)
- Modifications to the Affordable Housing policy (JP-H2)
- Retention of the Walshaw (JPA9) site
- Approach to streamlining allocation policies
- Inadequacy of Integrated Assessment
- Inadequacy of consultation

3.7 It was not considered that any new substantive issues were raised during the consultation which required further work and/or further hearing sessions, however a small number of further Main Modifications were identified which were considered necessary to make the plan sound, particularly in relation to HS2. A schedule of these further main modifications was submitted to the Inspectors and is published on the examination website (see Examination document RMM4).

#### **4.0 CHANGES TO NATIONAL POLICY**

4.1 Following the closure of the Modifications consultation, Government published two documents which had potential implications for PfE.

4.2 Government published a Written Ministerial Statement (WMS) on energy efficiency on 13 December 2023, alongside a consultation on the Future Homes and Buildings Standard. It states that “the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations”. The WMS goes on to clarify that:

“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.

- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).”
- 4.3 A further main modification was proposed to policy JP-S2 to reflect this statement (see Examination document RMM4).
- 4.4 A revised National Planning Policy Framework (NPPF) was published on 19 December 2023 (as amended). In terms of PfE, the most significant section is the provision in Annex 1, paragraph 230 (‘transitional arrangements’):
- “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 (pre-submission) 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 ....”
- 4.5 The ‘pre-submission’ stage referred to is the Regulation 19 or ‘Publication’ stage. The Publication stage consultation on the PfE plan took place in August 2021, therefore it will continue to be examined under the relevant previous version of the Framework and is unaffected by the changes in the December 2023 version in relation to plan-making.
- 4.6 Once the PfE plan is adopted, the policies in NPPF December 2023 will apply until such time as it is superseded.
- 4.7 A further Main Modification was proposed in relation to Policy JP-H1 to reflect the proposed changes to the requirement for local authorities to maintain a 5-year supply of housing sites.

## **5.0 THE INSPECTOR’S REPORT**

- 5.1 The Inspectors’ Report<sup>5</sup> was published by the GMCA on behalf of the nine local authorities on 15 February 2024. The report concludes “that all legal

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<sup>5</sup> Please note that PfE Plan policy and paragraph numbers referenced in the Inspectors’ Report, relate to the Submission version of the Plan – Examination document reference [SD1](#) (For reference, a schedule of current and submitted plan policy numbers is provided in Appendix 7).

requirements have been met and that with the recommended main modifications set out in the Appendix the Places for Everyone Joint Development Plan Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound” (paragraph 938).

5.2 The main modifications can be summarised as follows:

- Various changes to clarify the relationship between, and relative roles of, the Plan, and individual local plans, and to clarify that the Plan does not apply to the parts of Oldham that are within the Peak District National Park.
- Extension of the plan period to look ahead to 2039 (rather than 2037), and updates to the housing and employment land supply information to 2022 (rather than 2021).
- Clarifications to spatial strategy policies JP-Strat1 to JP-Strat11 and associated diagrammatic maps, and deletion of High Crompton Broad Location from policy JP-Strat7.
- Extensive changes to the detailed wording of site allocation policies JPA1 to JPA37 to ensure they are consistent with national policy, justified, internally consistent and effective in achieving sustainable development having regard to relevant site-specific issues.
- Deletion of allocation JPA10 Global Logistics and retention of parts of the site in the Green Belt.
- Deletion of allocation JPA28 North of Irlam Station and retention of the site in the Green Belt.
- Amendments to the site boundaries of allocations JPA1.2 Simister and Bowlee; JPA3.2 Timperley Wedge; JPA14 Broadbent Moss; JPA18 South of Rosary Road; JPA26 Hazelhurst Farm; and JPA32 South of Hyde.
- Modifications to policies JP-S1 to JP-S7 to ensure consistency with national policy and effectiveness, including deletion of policy JP-S4 Resilience as it serves no decision-making purpose.
- Modifications to policies JP-J1 to JP-J4 to reflect changes to the plan period, and to remove unnecessary or inconsistent requirements.

- Clarifications to policies JP-H1 to JP-H4 relating to housing development, and changes to the approaches to phasing and five-year supply to ensure consistency with national policy and that housing needs are met as soon as possible.
- Modifications to policies JP-G1 to JP-G7 to ensure consistency with national policy and effectiveness.
- Changes to JP-G5, JP-G9, JP-C7 and relevant site allocation policies relating to the South Pennine Moors, Rochdale Canal and Manchester Mosses protected habitats having regard to the habitat regulations assessment.
- Changes to policies JP-G9 and site allocation policies relating to biodiversity including any irreplaceable habitats on sites containing peat.
- Changes to JP-G2 and site allocation policies to secure compensatory improvements to the environmental quality and accessibility of remaining Green Belt.
- Deletion of policy JP-G8 relating to green space standards.
- Deletion of policy JP-G11 relating to safeguarded land.
- Modifications to policies JP-Strat12, JP-P1 to JP-P7 to ensure consistency with national policy and effectiveness.
- Inclusion of an additional policy in chapter 10 relating to the strategic road network.
- Various changes to the transport improvements referred to in the Plan, and addition of Appendix D setting out indicative transport mitigations for each allocation.
- Deletion of 30 of the 49 Green Belt additions proposed in the Plan.
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

5.3 The Inspectors did not consider that the further main modification to Policy JP-S2 referred to in Section 4 above, was necessary to make the plan sound. Their reasons are set out in paragraph 721-724 of their Report.

5.4 The Inspectors accepted the proposed further modification to Policy JP-H1 referred to in Section 4 above and proposed some further wording to the

reasoned justification. There is a typographical error in the Main Modifications schedule in relation to MM7.2 at paragraph 7.19. This should read Table 7.2 not Table 7.1.

## **6.0 POLICIES MAP**

- 6.1 The Policies Map is not defined in legislation as a development plan document. This means it is not formally part of the PfE Plan that it is intended will be adopted, nor was it within the Planning Inspectors' remit to recommend main modifications to it. However, local planning authorities must maintain an adopted Policies Map which illustrates geographically the application of the policies in the adopted development plan.
- 6.2 When the PfE Plan was submitted for examination, the PfE authorities were required to provide a Submission Policies Map showing the changes to the adopted Policies Maps within the PfE authorities, that would result from the proposals in the submitted PfE Plan. Subsequent to this, a number of modifications to the Policies Map were proposed during the plan's examination and these were consulted upon alongside the Main and Additional Modifications.
- 6.3 The Council will adopt the Policies Map (Appendix 5) incorporating the changes in so far as they relate to Trafford's administrative area into the Composite Policies Map.

## **7.0 FORMAL GOVERNANCE AND APPROVALS PROCESS FOR THE PFE PLAN**

- 7.1 For clarification and brevity, the chronology and brief description of relevant approvals and previous reports pertaining to the Places for Everyone Plan following the withdrawal Stockport from the Greater Manchester Spatial Framework (GMSF) in December 2020 are set out below. A chronology of approvals prior to this stage is provided in Council Report Appendix A.

- [Report to AGMA Executive Board - December 2020](#) - Greater Manchester's Plan for Homes, Jobs and the Environment: Greater

Manchester Spatial Framework Publication Plan 2020 - Next Steps following withdrawal of Stockport

- [Report to AGMA Executive Board February 2021](#) – set out the further details on the next steps to prepare a Joint Plan of the 9 GM districts to be known as ‘Places for Everyone.’
- [Trafford Executive March 2021](#) – agreement given to Trafford establishing a Joint Committee of the nine Greater Manchester Councils together with Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, and Wigan; and to delegate the formulation and preparation of the Joint Development Plan document to cover housing and employment land requirements including, as appropriate, strategic site allocations and Green Belt boundary amendments and associated infrastructure across the nine Greater Manchester LAs to that Committee
- [Report to Places for Everyone Joint Committee - July 2021](#) – agreed that the PfE Publication plan had substantially the same effect as the GMSF 2020 plan, approved the Regulation 19 consultation of the PfE 2021 Publication Plan and approved submission of the PfE Publication Plan 2021 to the Secretary of State following consultation
- [Trafford Executive July 2021](#) – approved the Regulation 19 consultation of the PfE 2021 Publication Plan and delegated authority to approve relevant Statements of Common Ground
- [Trafford Council July 2021](#) – approved the submission of the Places for Everyone Publication Plan 2021 to the Secretary of State
- [District Governance Meetings - July 2021](#) – all districts approvals for submission of the Places for Everyone 2021 for to the Secretary of State
- [Trafford Executive July 2022](#) – approval of delegated authority to agree modifications to the Plan that arise throughout the Examination in Public
- [Trafford Executive September 2023](#) – approval of consultation on Main and Additional Modifications to the PfE Plan
- [District Governance Meetings - Sept/Oct 2023](#) – all districts’ approvals of consultation on Main and Additional Modifications to the Plan



## **8.0 IMPLICATIONS FOR TRAFFORD OF THE PFE PLAN AS MODIFIED**

- 8.1 Section 3 of this report provides a summary of the modifications proposed to the plan as a whole, which principally comprises strategic, thematic and allocation policies.
- 8.2 All of the thematic policies and relevant strategic policies in the Plan will be applicable to Trafford and will be used in the determination of planning applications from the point of adoption, alongside the remaining Core Strategy and UDP policies.
- 8.3 A number of modifications were proposed to the Trafford allocation policies for Timperley Wedge and New Carrington, which were set out and summarised in the September 2023 Executive report, and subject to the Main Modifications consultation. For ease, these are set out in brief detail in the following paragraphs.
- 8.4 The overall amount of development proposed for each allocation remains unchanged from that contained in the submitted plan, as reported to Council in July 2021. Any amendments to the figures are a consequence of the required plan period change from 2020 – 2037 to 2022 - 2039.
- 8.5 For Timperley Wedge this means that the allocation policy (JPA 3.2) identifies development of 1,700 homes and 15,000 sqm of employment land in Plan period to 2039, and 2,500 residential units and 60,000 sqm of employment land in total extending beyond the plan period. A minimum of 45% of the homes will be affordable.
- 8.6 For New Carrington, the allocation policy (JPA 33) identifies 4,300 homes to be delivered in the Plan period to 2039, and 5,000 homes in total beyond the Plan period; as well as around 350,000 sqm employment floorspace for industry and warehousing. A minimum of 15% of the homes will be affordable.

Other proposed modifications to Trafford's allocation policies included:

- Timperley Wedge - one minor modification to the Green Belt boundary to include all of the ponds at the Davenport Green Site of Biological Interest

(SBI) within the Green Belt rather than within the developable area, for clarity and accuracy.

- New Carrington - additional policy requirements in relation to peat, following the specific hearing session on 5 July 2023. These relate to a need for hydrological and ground investigation studies to inform the masterplan, as well as suitable compensation strategies (where appropriate).
- Removal of generic policy criteria to avoid repetition and/or inconsistency with other policies in the Plan. The policy requirements have not been deleted but are covered by other policies in the Plan. This approach was applied to all proposed site allocations in in the Plan.

8.7 The Plan still maintains the requirement for development of both allocations to be in accordance with a Masterplan approved by the Local Planning Authority.

8.8 Masterplans for both of Trafford's allocations are in the early stages of preparation. The Council is preparing the masterplan for New Carrington whilst the masterplan for Timperley Wedge is being prepared by the landowners. Further detail and information on the masterplans such as papers, relevant evidence and timetables are/ will be publicly available on the dedicated masterplan webpages on the Council website.

8.9 Both masterplans will be the subject of future public consultation and further reports to the Executive and/or Council as appropriate.

#### **New Modifications following Main Modifications Consultation**

8.10 Following the Government's announcement on 4 October 2023 that High-Speed 2 (HS2) Phases 2a and 2b be cancelled, it has been necessary to propose a number of further Main Modifications to update the references to HS2 in the Plan, including within the Timperley Wedge allocation policy.

8.11 The corresponding publication of the Government's 'Network North – Transforming British Transport' on 4 October 2023, maintains the intention to deliver Northern Powerhouse Rail (NPR) "as previously planned, including high-speed lines" along with a commitment to work with local leaders to agree

how this can be achieved. Consequently, and with the HS2 Phase 2b safeguarding direction still in place, the Timperley Wedge policy has been amended to broadly replace 'HS2' with 'NPR' and to remove specific references to the proposed HS2 scheme design and mitigations. Additionally, the word 'new' has been added before 'Airport Station' in paragraph 11.88 of the

reasoned justification. This minor amendment is considered to be non-material but is helpful to clarify what is meant.

- 8.12 One further Main Modification has been made to the New Carrington allocation policy, through the addition of the word 'New' before 'Carrington' under one of the policy criteria, to ensure it is clear that the requirement applies across the whole of the site.

## **9.0 RELATIONSHIP WITH THE TRAFFORD LOCAL PLAN AND DEVELOPMENT PLAN**

- 9.1 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. Once the Places for Everyone Plan is adopted it will form part of Trafford Council's Development Plan and will replace some of the policies (fully or in part) in the adopted Core Strategy.

- 9.2 A schedule of the policies within Trafford's adopted Core Strategy (2012) which will be replaced by the Places for Everyone Plan is set out in Appendix A of the Plan.

- 9.3 Going forwards, under the current planning system, Trafford's new Local Plan will need to be consistent with the Places for Everyone Plan, and neighbourhood plans will need to be in general conformity with PfE's strategic policies.

- 9.4 The evidence that underpins the Places for Everyone Plan will also inform Trafford's new Local Plan but, as a strategic plan, it does not cover everything that the new Local Plan would. Therefore, Trafford's new Local Plan will set out more detailed policies including both strategic and non-strategic policies, as appropriate, reflecting local circumstances.

- 9.5 Trafford's new 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 Trafford's new Local Plan which will be produced, following its adoption. However, in the event that Trafford's 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).

## **10.0 INTEGRATED ASSESSMENT**

10.1 The Integrated Assessment (IA) has contributed to the development of the PfE through an iterative assessment, which reviewed the draft policies and the discrete site allocations against the IA framework. This has ensured the full range of environmental impacts have been assessed and appropriate mitigation measures included, where necessary. The IA documentation can be found in documents SD8 to SD17 and MDC6 to MDC12.

## **11.0 HABITATS REGULATIONS ASSESSMENT**

11.1 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.

11.2 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 (November 2022) with mitigation measures identified as appropriate, as set out in the HRA of PfE, November 2022. The outcome of the screening assessment of the Main Modifications to the PfE was that none of them would have a Likely Significant Effect on European designated sites and therefore do not change the findings of the HRA of the PfE, November 2022.

11.3 In November 2022 the HRA concluded that traffic levels resulting from a combined impact of development proposed in both the PfE Plan and Warrington's local plan could create an adverse air quality impact on the Holcroft Moss compartment of the Manchester Mosses SAC. Consequently, air quality mitigation is proposed in both the PfE Plan and the Warrington Local Plan for the Holcroft Moss site, in the form of a developer contribution towards a Habitat Mitigation Plan and the provision of measures to reduce reliance of cars, reduce trip generation and promote ultra-low vehicle emissions. The

details of the developer contribution will be set out in district supplementary planning documents following adoption of the PfE plan.

11.4 The HRA of the PfE, November 2022 also identified an adverse impact on the South Pennine Moors SAC/SPAs as a result of increased recreation pressure arising out of development levels proposed in the PfE. Consequently, the PfE Plan proposes recreation disturbance mitigation in the form of a development exclusion zone within 400m of the Moors, a requirement to assess and mitigate land for functionally linked habitats within 2.5km of the Moors and a requirement for development to provide or contribute towards the provision of Suitable Alternative Natural Greenspace and a Strategic Access, Monitoring and Management Strategy within 7km of the Moors remains a suitable mitigation package. Oldham, Rochdale and Tameside councils will set out details of the developer contribution in district supplementary planning documents.

## **12.0 NEXT STEPS**

12.1 Subject to and following Council's decision, officers will complete the final tasks that need to be undertaken in order to meet the requirements of the relevant regulations. This includes preparing an Adoption Statement and making the following documents available on the council's website and at the Council's inspection locations<sup>6</sup>.

- Places for Everyone Joint Development Plan Document (PfE Plan)
- Places for Everyone Policies Map
- Integrated Appraisal Reports (including Sustainability Appraisal Report)
- Adoption Statement
- Details of where the PfE Plan is available for inspection and the times at which the document can be inspected.

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<sup>6</sup> The inspection points in Trafford are detailed in Appendix B of this Council report.

- 12.2 The council will issue the Adoption Statement in line with the relevant regulations.
- 12.3 In addition to these documents, in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, the council will publish a Sustainability Appraisal post adoption statement, which explains how the sustainability appraisal reports undertaken at various stages during the preparation of the PfE Plan meet the requirements of these regulations.
- 12.4 Once the PfE Plan has been adopted, it will become part of the statutory development plan for Trafford with immediate effect. This means that it will have full weight in the determination of planning applications in Trafford. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 12.5 If the council adopts the PfE Plan, in accordance with section 113 of the Planning and Compulsory Purchase Act (2004), any person aggrieved by the adoption of the PfE Plan can only challenge this by making an application to the High Court on one of two grounds; that the PfE Plan is not within the appropriate power, i.e. any action that went further than the powers that are authorised under Part 2 of the Act, or a procedural requirement has not been complied with (these are terms cited within the Act). An application for leave to challenge must be made before the end of the period of six weeks beginning with the day after the relevant date, which for the purposes of the PfE Plan, begins on 22 March 2024 (the day after adoption of the plan comes into effect) and runs until 2 May 2024.
- 12.6 The High Court may make an interim order suspending the operation of the relevant development plan document or quash the plan wholly or in part. The purpose of this provision is to provide certainty as to the legal validity of the PfE Plan and to prevent later challenges.
- 12.7 The PfE Plan contains a monitoring framework with targets and indicators which will be used to monitor the achievement of the policies and reported on. Although the plan covers the period to 2039, in accordance with paragraph 33 of the National Planning Policy Framework (NPPF), the policies in local plans

should be reviewed to assess whether they need updating at least once every five years and should then be updated as necessary. The review process is a method to ensure that a plan and the policies within it remain effective. As explained in chapter 12 of the PfE Plan, the outcomes of PfE monitoring will form part of each PfE district's Local Plan Authority Monitoring Reports.

### **13.0 OTHER OPTIONS**

13.1 The alternative option is to not adopt the PfE Plan. This would have significant implications for each of the nine districts who have worked collaboratively on the preparation of the plan for around 10 years and would reduce the ability of the constituent districts to manage development under the plan-led system, undermining the Government's aim for each local planning authority to have an up-to-date adopted plan.

13.2 The Places for Everyone document is a key document setting out where potential development is likely in the future. As such, there are significant risks to the council if the PfE Plan is not adopted. These include:

- reputational damage (having invested significantly in the preparation of a Joint Plan, only then to not adopt and use a Plan found sound by independent planning inspectors);
- reduced ability to access funding associated with new development to provide essential infrastructure and to facilitate investment in the economy and communities of Trafford;
- not having an up-to-date Development Plan and, associated with this, not having up-to-date policies for the supply of housing, meaning that the council has less control on planning decisions for new housing in the borough;
- failure to provide relevant planning policies to guide development that would be essential to meet the Council's Corporate Priorities; and
- potential intervention by the Secretary of State.

13.3 Not adopting the PfE Plan would also likely require Trafford to deliver a higher amount of housing, requiring the release of more Green Belt land and would



also incur substantial additional costs which cannot be recovered from the time and resources expended to date on PfE.

13.4 There are, therefore, no realistic alternative options available that would be in the best interests of Trafford's residents, businesses, communities, or environments. The PfE Plan ensures that development in the Plan area and Trafford can come forward in a sustainable manner giving developers, investors, communities, and the Council certainty in decisions on planning matters.

#### **14.0 REASONS FOR RECOMMENDATIONS**

14.1 The PfE Plan enables a strategic approach to delivering growth and housing needs in the Plan area and in Trafford, and it sets the strategic framework for the Local Plan. Adopting the PfE Plan will provide Trafford with an up-to-date Development Plan and enable the Local Plan to be progressed, which will set out more detailed policies reflecting local circumstances for other places and communities of the borough.

**Finance Officer Clearance PC**

**Legal Officer Clearance DS**

**[CORPORATE] DIRECTOR'S SIGNATURE**



To confirm that the Financial and Legal Implications have been considered and the Executive Member has cleared the report.

## **Council Report Appendix A: Trafford Council Approvals Chronology Prior to Regulation 19 (July 2021)**

### **Greater Manchester Spatial Framework (GMSF)**

1. [Greater Manchester Combined Authority/ AGMA Executive Board August 2014](#) - agreed that the Greater Manchester Spatial Framework (GMSF) should be progressed as a joint Development Plan Document (DPD) and approval of public consultation.
2. [Trafford Special Executive March 2015](#) – recommendation to Council that responsibility for production of all stages of the GMSF Development Plan Document (DPD) other than publication, submission and adoption be delegated to the Association of Greater Manchester Authorities Executive Board (Joint Committee)
3. [Trafford Council March 2015](#) – approval of delegated responsibility for production of all stages of the GMSF Development Plan Document (DPD) other than publication, submission and adoption to the Association of Greater Manchester Authorities Executive Board (Joint Committee)
4. [Greater Manchester Combined Authority/ AGMA Executive Board October 2015](#) – approval for public consultation on strategic growth options
5. [Greater Manchester Combined Authority/ AGMA Executive Board October 2016](#) – approval for six weeks of public consultation on Draft GMSF
6. [Greater Manchester Combined Authority/ AGMA Executive Board January 2019](#) – approval for public consultation on GMSF: Revised Draft 2019
7. [Trafford Executive November 2020](#) – approval for the Regulation 19 consultation of the GMSF 2020 Publication Plan and delegated authority to approve relevant Statements of Common Ground

## **Council Report Appendix B: Inspection Locations in Trafford**

<b>Inspection Location</b>	<b>Monday</b>	<b>Tuesday</b>	<b>Wednesday</b>	<b>Thursday</b>	<b>Friday</b>	<b>Saturday</b>	<b>Sunday</b>
Trafford Town Hall Library, Trafford Town Hall, Talbot Road, Stretford, Manchester, M32 0TH	10am - 5pm	10am - 5pm	10am - 5pm	10am - 5pm	10am - 5pm	Closed	Closed
Sale Library, Sale Waterside, Sale, M33 7ZF	10am – 7pm	10am - 5pm	10am - 5pm	10am - 5pm	10am - 7pm	10am - 4pm	Closed
Hale Library, 25 Cecil Road, Hale, Altrincham, WA15 9SD	10am - 5pm	10am – 7pm	Closed	10am - 5pm	10am - 5pm	10am - 4pm	Closed
Altrincham Library, 2 Pott Street, Altrincham, WA14 1AH	9am – 8:30pm*	9am – 8:30pm*	9am – 8:30pm*	9am – 8:30pm*	9am – 8:30pm*	10am - 4pm*	Closed
Timperley Library, 405 Stockport, Timperley, Altrincham, WA15 7XR	10am - 5pm	10am - 5pm	Closed	10am – 7pm	10am - 5pm	10am - 4pm	Closed
Partington Library, Partington Library and Wellbeing Centre, 91 Central Road, Partington, Manchester, M31 4FL	10am - 5pm	10am - 5pm	Closed	10am - 5pm	10am - 5pm	10am - 4pm	Closed
Coppice Library, Coppice Library and Wellbeing Centre, Coppice Avenue, Sale, M33 4N	8am - 8pm*	8am - 8pm*	8am - 7pm*	8am - 7pm*	8am - 7pm*	10am - 5:30pm*	Closed
*Open+ access: <a href="https://www.trafford.gov.uk/residents/leisure-and-lifestyle/libraries/open-libraries.aspx">https://www.trafford.gov.uk/residents/leisure-and-lifestyle/libraries/open-libraries.aspx</a>							