

Report to COUNCIL

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)

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13 March 2024

Reason for Decision

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").

Due to the large sizes of the various appendices listed under section 20 below these are viewable on the <u>GMCA website.</u>¹

Executive Summary

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.

¹ The appendices listed at section 20 can be viewed on the GMCA website at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/adoption/adoption-documentation

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").

The report provides details of the current position with regards to the PfE Plan, summarising the main modifications, the Inspectors Report and any implications for Oldham of the PfE Plan as modified.

The documents appended to this report are listed under section 20 below and can be viewed on the <u>GMCA website</u>².

Recommendations

The Council is recommended to:

- 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 in so far as they relate to Oldham Council's administrative area into the Oldham 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, incorporating the Main Modifications and Additional Modifications) as part of the Development Plan for Oldham, in accordance with Section 23 of the Planning and Compulsory Purchase Act 2004 (as amended), with effect from 21 March 2024.
- v. Adopt the Policies Map (Appendix 5) with effect from 21 March 2024, 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 Cabinet Member for Housing and Licensing, 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.

² The appendices listed at section 20 can be viewed on the GMCA website at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/adoption/adoption-documentation

Council 13 March 2024

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)

1 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 the 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 Oldham's development plan and will be used to assess individual planning applications. As such Oldham'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 Oldham's local plan would. Therefore, Oldham's new 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 Oldham'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 Oldham's Local Plan following its adoption.

2 Current Position

Background

2.1 In 2014 the 10 Greater Manchester local authorities resolved to prepare a joint development plan, known as the 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 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 <u>Statement of Consultation 2022</u>³ which is available to view on the GMCA website.
- 2.3 The PfE Plan was submitted 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 defined in the National Planning Policy Framework (NPPF)⁴ and met all the relevant legislative requirements, including the duty to co-operate⁵.
- 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 (IN39⁶) was published on the examination website 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.

³ Statement of Consultation 2022 can be viewed online at https://www.greatermanchester-ca.gov.uk/media/5692/110401-pfe-statement-of-consultation-submission.pdf

⁴ The tests of soundness in paragraph 35 of the NPPF require that the plan is positively prepared, justified, effective and consistent with national policy.

⁵ 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.

⁶ The Inspectors' post hearing note (IN39) can be viewed online at IN39-Next-Steps-Sept-2023.pdf (hwa.uk.com)

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.

Main Modifications

- 2.8 The Inspectors' post hearing note (IN39⁷) 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.
 - 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.
- 2.9 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). 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.
- 2.10 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 website8.
- 2.11 Following approval by all nine PfE authorities, (details of the individual meetings can be found on the <u>GMCA website</u>⁹) 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 <u>RMM1</u>¹⁰). All of the responses are available on the GMCA website¹¹.

⁷ The Inspectors' post hearing note (IN39) can be viewed on the Places for Everyone examination website at IN39-Next-Steps-Sept-2023.pdf (hwa.uk.com)

⁸ The Main Modifications consultation documents can be viewed online at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/modifications/

⁹ Details of the individual district governance meetings can be viewed online at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/previous-stages/modifications/consultation-documents-as-presented-to-district-governance-meetings/

¹⁰ A list of respondents to the Modifications consultation can be viewed online at PFE-Modifications-consultation-2023_Respondents.pdf (hwa.uk.com)

¹¹ All of the responses are available to view online at <u>Consultation Responses - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</u>

- 2.12 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 RMM2¹²).
- 2.13 A 'Summary of Key Issues' report was also prepared and is available on the examination website (see Examination document RMM3¹³). 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 site (allocation JPA9)
 - Approach to streamlining the wording of allocation policies
 - Inadequacy of Integrated Assessment
 - Inadequacy of consultation
- 2.14 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 RMM4¹⁴).

Changes to national planning policy

- 2.15 Following the closure of the Modifications consultation, Government published two documents which had potential implications for PfE.
- 2.16 Government published a <u>Written Ministerial Statement</u> (WMS)¹⁵ 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 planmakers 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.

¹²The Complete Summary Report can be viewed online at https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Complete-Summary-Report ISSUED-1.pdf

¹³ The 'Summary of Key Issues' report can be viewed online at <u>Summary-of-Key-Issues ISSUED.pdf</u> (hwa.uk.com)

¹⁴ The Schedule of Further Main Modifications can be viewed online at https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Further-Main-Mods_ISSUED_160124.pdf.

¹⁵ The Written Ministerial Statement on Energy efficiency published 13 December 2024 can be viewed online at https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123

- 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).'
- 2.17 A further main modification was proposed to policy JP-S2 to reflect this statement (see Examination document RMM4¹⁶).
- 2.18 A revised National Planning Policy Framework (NPPF¹⁷) 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 (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 ...'

- 2.19 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.
- 2.20 Once the PfE plan is adopted, the policies in NPPF December 2023 will apply until such time as it is superseded.
- 2.21 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.

The Inspectors Report

- 2.22 The Inspectors' Report¹⁸ was published by the GMCA on behalf of the nine local authorities on 15 February 2024. The report concludes "that all legal 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).
- 2.23 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.

¹⁶ The schedule of further main modifications can be viewed online at https://www.hwa.uk.com/site/wp-content/uploads/2023/02/Further-Main-Mods_ISSUED_160124.pdf

¹⁷ NPPF can be viewed online at

https://assets.publishing.service.gov.uk/media/65829e99fc07f3000d8d4529/NPPF_December_2023.pdf)

18 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).

- 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.
- 2.24 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.
- 2.25 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.

Policies Map

- 2.26 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.
- 2.27 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.
- 2.28 The Council will adopt the Policies Map (Appendix 5) incorporating the changes in so far as they relate to Oldham Council's administrative area into the Oldham Policies Map.

Implications for Districts of the PfE Plan as modified

Peak District National Park

2.29 As stated at paragraph 2.24 modifications have been made to both the PfE Plan and the Policies Map to clarify that part of Oldham Borough is within the Peak District National Park and that this area is not subject to policies in the PfE Plan, but subject to development plan documents prepared by the Peak District National Park Authority.

Spatial Strategy

2.30 Policy JP-Strat 7: North East Growth Corridor of the PfE 2021 Plan identified the potential opportunity for further expansion of the economic and residential offer in the eastern most part of the corridor – the High Crompton Broad Location. The

purpose of the Broad Location was to signal the potential opportunity. The land would remain in the Green Belt until such a time that a review of PfE, or Oldham's Local Plan, demonstrated that it was necessary for the land to be released. As stated at paragraph 2.24 modifications have been made to delete High Crompton Broad Location and any references to it from within the Plan.

Jobs and Homes

2.31 As a result of modifications made to the Plan period the amount of office and industry and warehousing floorspace and the number of new homes to be delivered have been modified. In relation to the number of homes Oldham's annual average housing requirement remains the same at 680 homes a year with the total over the whole plan period increasing to 11,560 homes. The number of new homes to be delivered through the stepped requirement have been modified to 404 homes a year from 2022-25; 680 homes a year from 2025-30; and 772 a year from 2030-39. A further main modification has been made to correct an error in the Oldham figures in Table 7.1. The totality of homes to be delivered across the Oldham allocations within plan period should read 2,105, whilst the total 2022-2039 land supply figure should read 13,311 (both reflecting the amendment to paragraph 11.176 of the reasoned justification for JPA12 Broadbent Moss (see paragraph 2.40 below).

Allocations

- 2.32 Modifications have been made to all the Oldham allocations as a result of discussions at the Examination in Public and in response to action points received from the Inspectors.
- 2.33 Modifications have been made to the Oldham allocations for the following reasons:
 - To clarify policy requirements and improve the effectiveness of the policy and Plan as a whole;
 - To ensure consistency and avoid unnecessary duplication with thematic policy requirements elsewhere in the Plan; and
 - Consequential changes, particularly in relation to the reasoned justification, resulting from modifications proposed to policy requirements.
- 2.34 Boundary changes have been made to two Oldham allocations JPA14 Broadbent Moss and JPA18 South of Rosary Road. Further details regarding these can be found below under the respective allocations.
- 2.35 A summary of modifications made to each of the allocations in Oldham is provided below. Please note, this is not an exhaustive list of all the modifications that have been made. Full details of the main modifications can be found in the Inspectors Report Appendix Main Modifications to the Plan (Appendix 1.2).

2.36 JPA2 Stakehill:

- Criterion 1 has been modified to clarify that the allocation will deliver industrial and warehousing employment floorspace.
- Criterion 3 has been modified to include the need for an infrastructure phasing and delivery strategy.
- Amendments have been made to those criteria relating to affordable housing;
 the historic environment; landscape; compensatory improvements to the Green

- Belt; the provision of new and improved sustainable transport and highways infrastructure; biodiversity; education facilities; and social infrastructure.
- New criteria have been added relating to a) the need to define and/or strengthen
 the boundaries of the Green Belt around the site; and b) mineral safeguarding
 areas.
- Consequential changes have been made to the reasoned justification to reflect the above.

2.37 JPA12 Beal Valley (now numbered JPA10 in the PfE Plan):

- Criterion 1 has been modified to include the need for an infrastructure phasing and delivery strategy.
- Criteria 4 and 5 have been modified to clarify that main point of access will be from Oldham Road (directly into the allocation) and that any development would be required to safeguard an accessible route for walking and cycling connections through to Shaw centre.
- Criterion 7 has been modified to require any development to provide a proportionate and evidence-based contribution to the delivery of the new Metrolink stop and new park and ride facility.
- Amendments have been made to those criteria relating to affordable housing; the provision of sustainable transport and highways infrastructure; green infrastructure; landscape; compensatory improvements to the Green Belt; biodiversity; water quality of River Beal; open space provision; education facilities; and the historic environment.
- New criteria have been added relating to a) the need for any development to
 mitigate the recreation disturbance impacts on the South Pennine Moors Special
 Area of Conservation (SAC) and Special Protection Area (SPA); and b) minerals
 safeguarding areas.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – requirement for further phase 1 habitat surveys (JP-G8); health and community facilities (JP-P6); and flooding (JP-S4).
- Consequential changes have been made to the reasoned justification to reflect the above, including:
 - A further main modification to paragraph 11.157 presented by the Inspectors in their report to clarify that development on the northern part of the allocation will have highway access linking to the adjoining existing local road network.

2.38 JPA13 Bottom Field Farm (now numbered JPA11 in the PfE Plan):

- Amendments have been made to those criteria relating to affordable housing; the provision of sustainable transport and highways infrastructure; landscape; the need to define and/or strengthen the boundaries of the Green Belt around the site; compensatory improvements to the Green Belt; and education facilities.
- A new criterion has been added relating to minerals safeguarding areas.

- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – green infrastructure (JP-G2); biodiversity (JP-G8); requirement for further phase 1 habitat surveys (JP-G8); open space provision (JP-P7); health and community facilities (JP-P6); historic environment (JP-P2); and flooding (JP-S4).
- Consequential changes have been made to the reasoned justification to reflect the above.

2.39 JPA14 Broadbent Moss (now numbered JPA12 in the PfE Plan):

- The Green Belt boundary has been amended to facilitate delivery of access onto Ripponden Road. The modification minimises the loss of Green Belt whilst ensuring that the revised Green Belt boundary, to facilitate the access road up to Ripponden Road, can still be accommodated. The modification allows for the creation of a clearly defined Green Belt boundary in that part of the site as the spine road, when constructed, would be a readily recognisable physical feature that is likely to be permanent. Further details can be found in GMCA81 19. In the PfE 2021 Plan the allocation was split into two parcels by the Metrolink line. A further modification to the boundary has been made to join these two parcels together so that there is just one red line boundary for the whole allocation.
- Criterion 1 has been modified to include the need for an infrastructure phasing and delivery strategy.
- Criterion 4 has been modified to refer to the delivery of industrial and warehouse floorspace.
- Criterion 5 has been modified to clarify the main points of access.
- Criterion 7 has been modified to require any development to safeguard land for and provide a proportionate and evidence-based contribution towards, the delivery of the new Metrolink stop and new park and ride facility.
- Amendments have been made to those criteria relating to affordable housing and housing density (including a further main modification presented by the Inspectors in their report to clarify that the incorporation of higher density housing is to be in accordance with policy JP-H4); the provision of sustainable transport and highways infrastructure; provision of a local centre; green infrastructure; landscape; the need to define and/or strengthen the boundaries of the Green Belt around the site; compensatory improvements to the Green Belt; biodiversity; water quality of the River Beal; and education facilities.
- New criteria have been added relating a) the need for any development to mitigate the recreation disturbance impacts on the South Pennine Moors SAC and SPA; and b) minerals safeguarding areas.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – open space provision (JP-P7); requirement for further phase 1 habitat surveys (JP-G8); health and community facilities (JP-P6); and historic environment (JP-P2).
- Consequential changes have been made to the reasoned justification to reflect the above, including:

¹⁹ The note (GMCA81) relating to JPA14 Broadbent Moss – proposed boundary change can be viewed online at JPA14-Broadbent-Moss-Green-Belt-Boundary-Change_ISSUED.pdf (hwa.uk.com)

 A further main modification to correct an error in the penultimate sentence of paragraph 11.176 which should read that around 998 homes will be delivered during the plan period.

2.40 JPA15 Chew Brook Vale (now numbered JPA13 in the PfE Plan):

- The residential capacity has been increased from around 90 to around 138 homes and the amount of commercial, leisure and retail facilities to be provided has been reduced to 'up to 3,000sqm' from 'up to 6,000sqm'.
- Criterion 1 has been modified to include the need for an infrastructure phasing and delivery strategy.
- Amendments have been made to those criteria relating to affordable housing and housing mix; the provision of sustainable transport and highways infrastructure; green infrastructure; landscape; biodiversity; Chew Brook; compensatory improvements to the Green Belt; the need to define and/or strengthen the boundaries of the Green Belt around the site; education facilities; historic environment; and flooding.
- A new criterion has been added relating to the need for any development to mitigate the recreation disturbance impacts on the South Pennine Moors SAC and SPA.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies –requirement for further phase 1 habitat surveys (JP-G8); open space provision (JP-P7); health and community facilities (JP-P6); and design (JP-P1).
- The requirement for any development to be informed by, and deliver the recommendations of, an appropriate visitor management plan has been deleted and reference to the need to have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995 moved to the reasoned justification.
- Consequential changes have been made to the reasoned justification to reflect the above, including a non-consequential typographical change to paragraph 11.194 of the reasoned justification, removing a superfluous 'a' before the word 'small' in the fifth line.

2.41 JPA16 Cowlishaw (now numbered JPA14 in the PfE Plan):

- Amendments have been made to those criteria relating to affordable housing; access; the provision of sustainable transport and highways infrastructure; green infrastructure, landscape and biodiversity; open space provision; and education facilities.
- A new criterion has been added relating to the need for any development to mitigate the recreation disturbance impacts on the South Pennine Moors SAC and SPA.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – requirement for further phase 1 habitat surveys (JP-G8); health and community facilities (JP-P6); historic environment (JP-P2); and flooding (JP-S4).

• Consequential changes have been made to the reasoned justification to reflect the above.

2.42 JPA17 Land south of Coal Pit Lane (now numbered JPA15 in the PfE Plan):

- Criterion 1 has been modified to include the need for an infrastructure phasing and delivery strategy.
- Amendments have been made to those criteria relating to affordable housing; access; the provision of sustainable transport and highways infrastructure; green infrastructure, landscape and biodiversity; the need to define and/or strengthen the boundaries of the Green Belt around the site; compensatory improvements to the Green Belt; education facilities; and site remediation.
- A new criterion has been added relating minerals safeguarding areas.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – requirement for further phase 1 habitat surveys (JP-G8); open space provision (JP-P7); health and community facilities (JP-P6); historic environment (JP-P2); and flooding (JP-S4).
- Consequential changes have been made to the reasoned justification to reflect the above.

2.43 JPA18 South of Rosary Road (now numbered JPA16 in the PfE Plan):

- The Green Belt boundary has been modified so that the area of Green Belt in which Bankfield Clough SBI falls sits outside the allocation red line boundary.
- Amendments have been made to those criteria relating to access; the provision
 of sustainable transport and highways infrastructure; green infrastructure,
 landscape and biodiversity; the need to define and/or strengthen the boundaries
 of the Green Belt around the site; compensatory improvements to the Green
 Belt; education facilities; and the historic environment.
- A new criterion has been added relating minerals safeguarding areas.
- Criteria relating to the following have been deleted as it was felt that these are adequately covered by the thematic policies – requirement for further phase 1 habitat surveys (JP-G8); open space provision (JP-P7); health and community facilities (JP-P6); and flooding (JP-S4).
- The requirement (criterion 15) to ensure that an appropriate access for United Utilities is maintained has been deleted.
- Consequential changes have been made to the reasoned justification to reflect the above.

2.44 Green Belt addition GBA17 - Land behind Denshaw Village Hall

 GBA17 has been deleted following the Inspectors' conclusions that there was insufficient evidence to demonstrate exceptional circumstances in line with national policy and case law (see paragraph 2.29).

Integrated Assessment and Habitat Regulations Assessment

- 2.45 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 SD17²⁰ and MDC6 to MDC12²¹.
- 2.46 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.
- 2.47 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.
- 2.48 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 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.
- 2.49 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 thePfE. 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.

²¹ The IA documentation for the Modifications can be viewed online at Modifications Documentation 2023 - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

²⁰ The IA documentation for Submission can be viewed online at <u>Places for Everyone Submission</u> Documents 2022 - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

Next Steps

- 2.50 Subject to, and following, the 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, at all Oldham's libraries and at Access Oldham²³ at the Civic Centre:
 - 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.
- 2.51 The council will issue the Adoption Statement in line with the relevant regulations.
- 2.52 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.
- 2.53 Once the PfE Plan has been adopted, it will become part of the statutory development plan for Oldham with immediate effect. This means that it will have full weight in the determination of planning applications in Oldham. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 2.54 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. Firstly, that the PfE Plan is not within the appropriate power, i.e. action was taken that went further than the powers that are authorised under Part 2 of the Act or, secondly, 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.
- 2.55 The purpose of this provision in section 113 is to provide certainty as to the legal validity of the PfE Plan and to prevent later challenges. If they consider that the appropriate legal powers and procedures have not been complied with, 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.

²³ Details regarding Access Oldham and the opening times can be found online at https://www.oldham.gov.uk/info/200609/contact/937/access_oldham

²² Details regarding Oldham's libraries and their opening times can be found online at https://hla.oldham.gov.uk/libraries/local-libraries/

2.56 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.

3 Options/Alternatives

- 3.1 Option 1 To adopt Places for Everyone Joint Development Plan, in line with recommendations at the front of this report. There are no disadvantages to Option 1.
- 3.2 Option 2 To not adopt Places for Everyone Joint Development Plan, in line with the recommendations at the front of this report. There are no advantages to Options 2.

4 Preferred Option

4.1 Option 1 - To adopt Places for Everyone Joint Development Plan, in line with recommendations at the front of this report.

5 Consultation

5.1 Extensive consultation has been carried throughout the preparation of the GMSF, now Places for Everyone. Details regarding the consultation that has been carried out can be found on the GMCA website²⁴.

6 Financial Implications

6.1 The preparation and examination of the Places for Everyone Plan 2021 generated a revenue cost for nine 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. 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. Further reports will be provided to the Joint Committee as appropriate.

²⁴ Details regarding consultation carried out throughout the preparation of GMSF, now Places for Everyone, can be viewed online at <u>Places For Everyone - Greater Manchester Combined Authority</u> (greatermanchester-ca.gov.uk)

- 6.2 The decision to adopt the Places for Everyone Plan has no financial implications. Additional costs however may be incurred, in relation to the monitoring of the Plan and if the decision to adopt the Plan is legally challenged. Further reports will be presented to Cabinet seeking approval for any obligations following the adoption of the Plan.
- 6.3 There are no capital consequences identified.

(John Hoskins, Finance Manager)

7 Legal Implications

- 7.1 In preparing the PfE Plan, 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.
- 7.2 The PfE Plan was submitted to the Secretary of State for independent examination under section 20 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 PfE Plan was published and representations were invited, pursuant to Regulation 19 and Regulation 20 of the 2012 Regulations. Following Submission, the PfE Plan 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.
- 7.3 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.

(Alan Evans, Group Solicitor)

8. Co-operative Implications

- 8.1 The PfE Plan supports delivery of the council's co-operative agenda and its ambitions in relation to delivering an inclusive economy and thriving communities. It will contribute to delivery of these ambitions through setting a strategic planning framework that will:
 - help to meet our local housing need and diversify our housing stock;
 - create opportunities for our key growth sectors and for businesses to expand and locate to; and
 - protect and enhance our green infrastructure and natural environment, ensuring that communities have open spaces to enjoy and support their health and well-being.

(James Mulvaney)

9 Human Resource Implications

9.1 Not applicable

10 Risk Assessments

- 10.1 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 it 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 of Oldham;
 - 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 priorities in the Oldham Plan and Oldham Corporate Plan; and
 - potential intervention by the Secretary of State.
- There are also risks associated with adopting the PfE Plan, related to the potential for a legal challenge, as outlined in the legal comments above. However, 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.

(Vicki Gallacher, Head of Insurance and Information Management)

11 IT Implications

11.1 Not applicable

12 Property Implications

12.1 The adoption of the Places for Everyone Joint Local Plan will potentially have some implications for some specific council assets which are part of two housing allocations, but these impacts are minor in nature and will be addressed as and when these developments come forward. Like any landowner seeking to develop their property assets, the Council will be subject to developing its land and assets in line with the relevant planning policy.

(Katy Webster, Assistant Director Property and Projects)

13 Procurement Implications

13.1 Not applicable

14 Environmental and Health & Safety Implications

14.1 The PfE 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.

15 Community cohesion, including crime and disorder implications in accordance with Section 17 of the Crime and Disorder Act 1998

15.1 The PfE 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.

16 Oldham Equality Impact Assessment, including implications for Children and Young People

- 16.1 No further Equality Impact Assessment is required.
- As set out in paragraphs 2.45 to 2.56 above, a Integrated Assessment (IA) has been undertaken which contributed to the development of the PfE through an iterative process. In addition to meeting sustainability appraisal and strategic environmental assessment requirements, the IA process has included an Equality Impact Assessment (EqIA) and a Health Impact Assessment (HIA). The IA can be found on the <u>GMCA website²⁵</u>.
- The purpose of the IA is to promote sustainable development, health and equality issues and ensure that they are considered as the plan is being prepared. The IA helps to guide the development of the PfE, by testing the policies at each stage, against an agreed list of objectives.
- As the IA process considers many of the issues identified in the Oldham Impact Assessment it is not considered necessary to complete the tool in this instance.
- With regards to the Corporate priorities, the PfE Plan will support all those identified: Healthy, safe and well-supported residents; A great start and skills for life; Better jobs and dynamic businesses; Quality homes for everyone; and A clean and greed future.
- 16.6 With regards to the Future Oldham aims, the PfE Plan will support all those identified: A well-rounded, enriching, lifelong education; The opportunity to get a decent job that pays well and offers security and flexibility; Quick, cheap and easy transport to every part of the city region; A home that is affordable, well-

²⁵ Details regarding the Integrated Assessment can be viewed online at <u>Places For Everyone - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</u>

maintained, and appropriate; Timely access to vital services to keep people healthy and safe; A clean, green and healthy environment; Diverse opportunities to get together, with regular activities to boost physical health, mental health and community spirit; and A local area that meets people's needs and makes them proud.

(Elizabeth Dryden-Stuart, Strategic Planning and Information Team Leader)

- 17 Key Decision
- 17.1 No
- 18 Key Decision Reference
- 18.1 N/A

19 Background Papers

19.1 The following is a list of background papers on which this report is based in accordance with the requirements of Section 100(1) of the Local Government Act 1972. It does not include documents which would disclose exempt or confidential information as defined by the Act:

Report to AGMA Executive Board - December 2020²⁶

Report to AGMA Executive Board - February 202127

Report to Places for Everyone Joint Committee - July, 2021²⁸

<u>District Governance Meetings - July 2</u>021²⁹

Oldham Council's report on Places for Everyone Publication Plan 2021 – July 2021³⁰

Places for Everyone Submission Plan - Document SD131

Places For Everyone - Documentation³²

²⁶ Report to AGMA Executive Board – December 2020 can be viewed online at (Public Pack)AGMA Supplemental Agenda Supplement for AGMA EXECUTIVE BOARD, 11/12/2020 13:00 (greatermanchester-ca.gov.uk)

²⁷ Report to AGMA Executive Board – February 2021 can be viewed online at (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)

²⁸ Report to Places for Everyone Joint Committee – July 2021 can be viewed online at <u>Greater Manchester</u> <u>Combined Authority (greatermanchester-ca.gov.uk)</u>

²⁹ Reports of District governance meetings can be viewed online at 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/

³⁰ Oldham Council's report on Places for Everyone Publication Plan 2021 – July 2021 can be viewed online at https://committees.oldham.gov.uk/ieListDocuments.aspx?Cld=144&Mld=8198

³¹ The Places for Everyone Submission Plan published August 2021 can be viewed online at <u>Places for Everyone Submission Documents 2022 - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</u>

³² Places for Everyone documentation can be viewed online at <u>Places For Everyone - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</u>

Places For Everyone Joint DPD Examination Website³³

District Governance Meetings - Sept/Oct 202334

Oldham Council's report on Proposed Modifications Consultation – October 2023³⁵

20 Appendices

- 20.1 The following documents are being presented to District Council Meetings for adoption of the Places for Everyone Plan:
 - 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

The appendices listed above are available online at the GMCA website³⁶.

³³ The Places for Everyone examination website can be viewed online at <u>GMCA – Places For Everyone Joint</u> <u>DPD | Helen Wilson Consultancy Limited (hwa.uk.com)</u>

³⁴ Details of the individual district governance meetings can be viewed online at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/previous-stages/modifications/consultation-documents-as-presented-to-district-governance-meetings/

³⁵ Oldham Council's report on the Proposed Modifications Consultation – October 2023 can be viewed online at

 $[\]frac{https://committees.oldham.gov.uk/documents/s140956/Cabinet\%20Report\%20for\%20Proposed\%20Modifica}{tions\%20consultation_FINAL.pdf}$

³⁶ The appendices listed at section 20 can be viewed on the GMCA website at https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/adoption/adoption-documentation