

Proposed Modifications to the Places for Everyone Plan to reflect the Revised Habitat Regulation Assessment, November 2022

1. Background

- 1.1 In the Written Statement by Places for Everyone (PfE) to IN9, Matter 9, Issue 9.1, Q9.1 and Issue 9.2 Q9.5 and 9.10 (Examination Document [M9.1](#)) we proposed modifications to the PfE to reflect the updated HRA evidence base in the HRA Addendum, which was submitted to the Inspectors in September 2022 (Examination Document [M9.1.1](#)).
- 1.2 The HRA Addendum was intended to supplement the Submission HRA, February 2022 (Submission Document [SD20](#)) and in some parts superseded it.
- 1.3 After submitting the HRA Addendum to the Inspectors in October, the GMCA have been in discussion with Natural England to resolve their remaining outstanding comments on the HRA. To address them, the GMCA and Natural England thought it more appropriate to produce a complete Revised HRA, rather than make amendments to the HRA Addendum. Therefore, a complete Revised HRA has been produced by the GMCA and a Statement of Common Ground on the HRA has been signed by Natural England to confirm that the HRA complies with the Conservation of Habitats and Species Regulations 2017.
- 1.4 The Revised HRA supersedes the Submission HRA, February 2022 and the HRA Addendum, September 2022.
- 1.5 The remainder of this note highlights our proposed modifications to the Plan to take account of the HRA work to make the Plan sound through our Matters Statements [M9.1](#), [M14.1](#), [M20.1](#), [M21.1](#), and [M23.1](#); and proposes a new modification to Policy JP-C7 which has not previously been submitted to the examination.

2. Proposed Modifications from Examination Document M9.1

- 2.1 The proposed HRA modifications to the PfE in M9.1 were based on the HRA Addendum, nevertheless they remain valid and are consistent with the outcomes of the Revised HRA. Therefore, they are still proposed to make the Plan sound.
- 2.2 The proposed modifications from M9.1 are replicated below:
Q9.5, paragraphs 9.33 – 9.37, Modifications to Policy JP-G5
- 2.3 An additional criterion (7) is proposed in Policy JP-G5 to:

‘ensure that new development close to the SAC and SPAs does not have an adverse impact on protected habitats.’

- 2.4 A modification to paragraph 8.33 of the reasoned justification is proposed:

“The importance of the mosaic of moorland habitats is reflected in a range of international, national and local designations, including parts of the large South Pennine Moors Special Area of Conservation and Special Protection Area. These habitats support important breeding bird populations and it is important that new nearby development does not have an adverse impact through domestic features, disturbances, recreation and loss/disturbance to functionally linked habitats. The peat soils of the uplands store significant volumes of carbon, but extensive areas are degraded. Habitat restoration, particularly of blanket bog, but also other wetland habitats and woodland, will be important for addressing multiple green infrastructure priorities such as sequestering carbon from the atmosphere, minimising flood risk, reducing soil erosion, improving water quality, combating the heat island effect of Greater Manchester and enhancing biodiversity. However, such restoration may have future land use implications, for example by requiring the re-wetting of moorland and/or the blocking of drainage ditches.”

Q9.10, paragraphs 9.56 – 9.60, Modifications to JP-G9

- 2.5 A new criterion (f) to the policy is proposed:

‘Where appropriate, development will be expected to contribute towards mitigating any identified pollution impacts on European and international designated habitat sites’.

- 2.6 A new paragraph is proposed to the reasoned justification between paragraph 8.53 and 8.54 to provide background to this criterion, stating:

‘In line with the outcomes of the HRA in relation to the Manchester Mosses SAC, Rochdale Canal SAC and the South Pennine Moors SAC / Peak District Moors SPA / South Pennine Moors SPA, new development will be required to contribute towards the implementation of measures to mitigate the adverse impacts on these European designated sites, where appropriate.’

3. Modifications to PfE Allocation Policies

- 3.1 In our response to Q9.1 we also indicated that modifications to some of the allocation policies in the Plan are proposed to reflect the HRA addendum. These modifications also remain valid and are consistent with the outcomes of

the Revised HRA and are therefore, they still proposed to make the Plan sound. The modifications are outlined in our response IN10: Matters, Issues and Questions relating to allocations ([M14.1](#), [M20.1](#), [M21.1](#), [M23.1](#)). The relevant allocations are listed below with the link to the Matters Statement which contain the modifications.

- JPA 1.1 Heywood/Pilsworth ([M14.1](#), [Q14.5](#), [paragraphs 14.36 – 14.37, p8](#))
- JPA 1.2 Simister and Bowlee ([M14.1](#), [Q14.11](#), [paragraphs 14.83 – 14.84, p16-17](#))
- JPA 2 Stakehill ([M14.1](#), [Q14.20](#), [paragraphs 14.137 – 14.141, p27-28](#))
- JP20 Castleton Sidings ([M20.1](#), [Q20.12](#), [paragraphs 20.50 – 20.52, p12-13](#))
- JPA 22 Land North of Smithy Bridge ([M20.1](#), [Q20.24](#), [paragraphs 20.96 – 20.98, p22-23](#))
- JPA 25 Trows Farm ([M20.1](#), [Q20.37](#), [paragraphs 20.160 – 20.161, p36](#))
- JPA 28 North of Irlam Station ([M21.1](#), [Q21.21](#), [paragraph 21.31 \(e\), p17](#))
- JPA 29 Port Salford Extension ([M21.1](#), [Q21.29](#), [paragraph 21.42 \(g\), p24](#))
- JPA 33 New Carrington ([M23.1](#), [Q23.9](#), [paragraph 23.55 – 23.56, p9](#))

4. New Proposed Modification to reflect the Revised HRA, November 2022

- 4.1 A modification is proposed to Policy JP-C7 Transport Requirements of New Development to reflect the Revised HRA and make the Plan sound. This modification is new and has not previously been submitted to the examination.

Policy JP-C7: Transport Requirements of New Development

- 4.2 A modification is proposed to the first paragraph of the policy:

‘Planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate. Planning applications which are required to be accompanied by a Transport Assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC). Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss the Manchester Mosses SAC of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles and provide a contribution towards restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan.

We will require new development to be located and designed to enable and encourage walking, cycling and public transport use, to

reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.'

- 4.3 The modification is proposed to implement the delivery of the Habitat Mitigation Plan to reduce air quality impacts on the Manchester Mosses SAC from traffic on the M62 which runs adjacent to the Holcroft Moss portion of the site. The proposed modification to the policy has been agreed with Warrington Borough Council, who are proposing the same policy modification to their Local Plan, and Natural England through a specific Statement of Common Ground on HRA mitigation for the Manchester Mosses SAC (a copy of which is within the Appendix of the Statement of Common Ground with Natural England on the PfE HRA, November 2022).