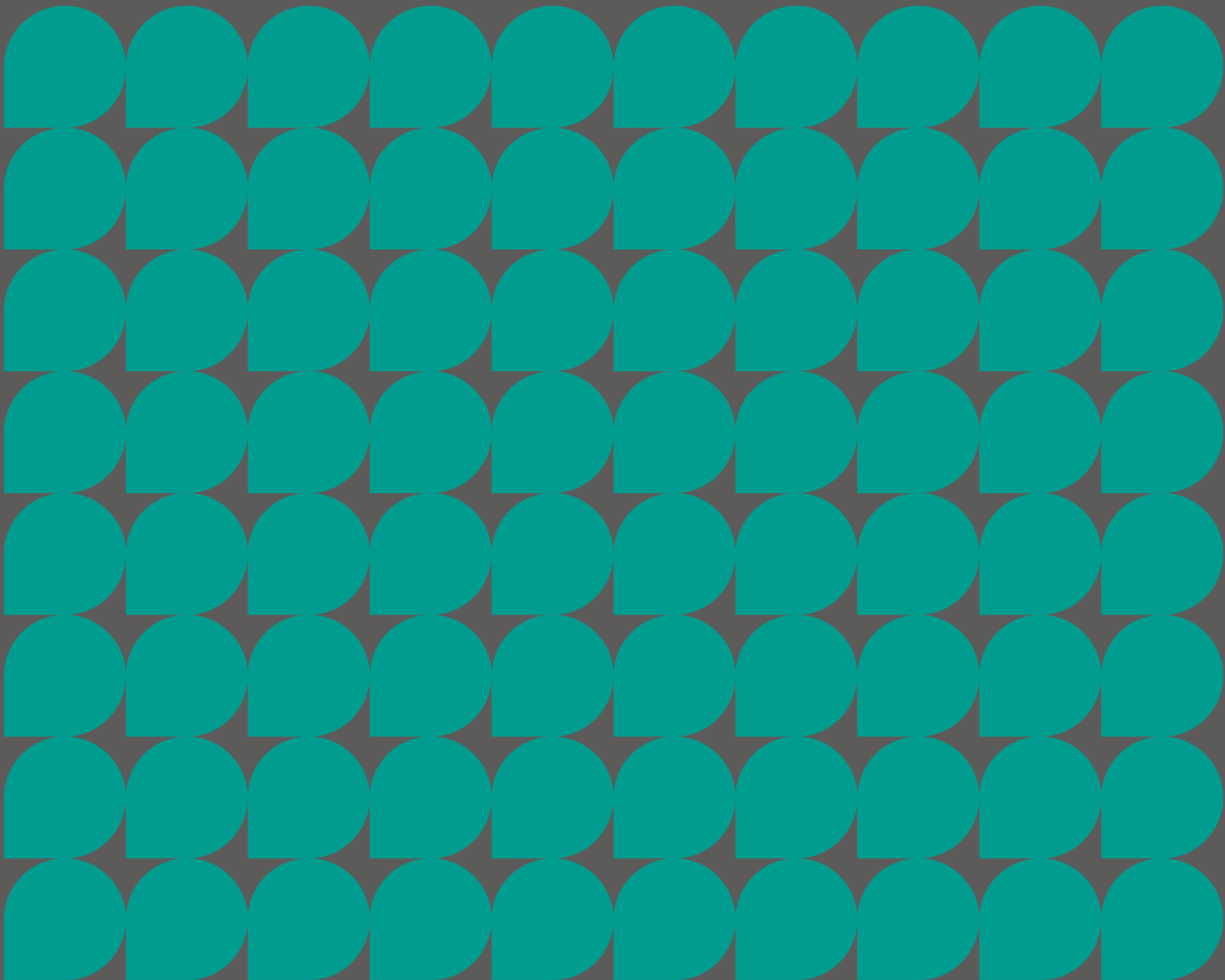


Places for Everyone

Regulation 22 Summaries of Thematic
Main Issues

February 2022



Chapter 3 – Vision and Objectives

The main issues raised in relation to the policies within PfE 2021 Chapter 3 – Vision and Objectives and are set out below.

Vision

Row	Main Issue	PfE Response
1	Support the stated Vision but consider that the strategic policies of PfE fall short of presenting a strategy that will deliver that vision.	No change is considered necessary. PfE is a strategic planning document and is considered to be consistent with the NPPF. The Plan as a whole sets out an appropriate strategic policy framework to contribute to the delivery of the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies within the plan require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan in line with the Vision and Objectives. Additionally and as detailed at paragraph 3.2, PfE is only one of the plans being used to deliver the ambitions of the Greater Manchester Strategy.
2	The PfE is not in accordance with the new NPPF Paragraph 22. The Vision and Key Diagram should consider at least a 30-year period. Given the constraints imposed by the Green Belt, this will necessitate the identification of further sites or broad locations for future housing development.	The Regulation 19 version of the PfE had already been published for approval by the individual districts at the time the NPPF was revised in July 2021 at that point in time no definition had been provided in NPPF or NPPG for the phrase “larger scale developments such as new settlements or significant extensions to existing villages and towns”. Therefore it was considered appropriate to proceed with the Regulation 19 consultation with a view to reviewing the position following the consultation, should guidance be published. NPPG was indeed revised in October 2021 and clarifies that the new policy requirement in paragraph 22 applies “where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period.” [NPPG Paragraph: 083 Reference ID: 61-083-20211004]. It is therefore considered that the PfE Plan has been prepared in accordance with the new element of NPPF paragraph 22 and no change is required to the Plan.
3	The vision does not reflect the ambition that Greater Manchester should be demonstrating, and to become a ‘top global city’ and primary driver for ‘Northern Powerhouse’. Concerned that the levels of growth proposed will not provide the opportunity to provide people with a decent home, especially those in need of an affordable house. The plan assumes no drive for additional homes in connection with ambitious economic growth and potential associated inward migration.	The PfE Vision replicates that of the Greater Manchester Strategy as the PfE represents one of the tools at Greater Manchester’s disposal to achieve its overall ambition. The ambitions set out in the Vision are reflected in the varied policies of the PfE. It is considered that the PfE plan is ambitious and will be delivering far more development than has been proposed in current local plans. The plan will be meeting the identified needs for housing and employment. Further details on these are in the Housing Topic Paper [06.01.03] and Employment Topic Paper [05.01.04] and the scale of development has been considered in the The Growth and Spatial Options Paper [02.01.10]

Row	Main Issue	PfE Response
4	Disappointed the vision has not been updated to reflect the recent Covid 19 pandemic. It is believed there will be long term changes to the way in which people live and work in particular, with flexible working becoming more widespread. Access to greenspace is also considered to be more important than ever to residents. Do not believe the vision can be considered to meet the test of soundness unless it references this material change in circumstances and recognises those allocations which are best placed to meet those changing needs.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
5	The vision should be refocused on addressing the climate emergency, rather than on accelerated economic growth. A reordering of the bullet points and a minor edit is recommended so the urgency of the climate emergency is fully translated.	The impact of the climate emergency has been considered in the Integrated Assessment of the Greater Manchester Spatial Framework – Greater Manchester Spatial Framework Scoping Report (2021) [02.01.01] . Although the evidence has been updated, no changes to the IA objectives or criteria are recommended. It is noted that the declaration of climate emergencies by GMCA and the 10 local authorities, is the most significant shift since the previous update to the scoping report. The IA objectives and criteria particularly related to climate emergency have been carefully considered and it is concluded that no additions or changes are required, and that this can be done using the relevant objectives and criteria in the existing IA Framework.
6	The vision still refers to Manchester Airport without taking into account the environmental damage it causes and need to become a net zero contributor.	As stated in Policy JP-Strat 10, development which is in line with <ul style="list-style-type: none"> - Government policy - Manchester's Local plan policies and - Manchester Airport Group's Corporate Social Responsibility Strategy will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. The CSR sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038.
7	The vision does not refer to the historic environment, and the objectives are weak on this matter, this does not set an appropriate framework for the rest of the plan, in that heritage is not to be a strategic matter alongside other priorities.	No change necessary. The PfE Vision is shared with GMS. Policy JP-P2 sets out a clear framework for the conservation and enhancement of the historic environment, supported by evidence. Published alongside the PfE 2021 are: <ul style="list-style-type: none"> - A Heritage Topic Paper [08.01.12]; - A strategic historic environment assessment [08.01.01]; - Individual districts have commissioned site specific historic environment assessments.

PfE 2021 Objective 1 – Meet Our Housing Need

Row	Main Issue	PfE Response
1	Should not be met if it requires land to be released from the Green Belt for development.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . The quantum of development has also been considered in the Growth and Spatial Options Paper [02.01.10] .
2	Concerned that the housing strategy as proposed currently will fall short of achieving Objective 1, as it will not allow for the delivery of lifetime sustainable housing across all nine PfE districts.	The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives, including housing. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] .
3	There is an over-reliance on sites identified in the SHLAA, the assumption that the very large sites in the PfE will all deliver in full in the plan period to 2037 is unrealistic, there are existing issues with housing delivery as reported through the Housing Delivery Test results, there is a failure to demonstrate a five-year housing land supply in some of the PfE areas.	No change considered necessary. Recent results from the Housing Delivery Test demonstrate that delivery has been improving across the plan area. Therefore despite the viability challenges identified with some of the land supply, the housing targets within the plan are considered to be deliverable given the success that the districts have had in securing funding to bring forward some of the more challenging sites and that buffers have been applied to the land supply. Notwithstanding this, Chapter 12 sets out an appropriate monitoring framework which will enable us to monitor whether we are achieving our strategic objectives. In the event that targets are not being met, the plan will be subject to formal review.
4	Suggested change to 'Increase net additional dwellings to significantly boost the supply of housing in Greater Manchester' to ensure policy is in keeping with NPPF aim of 'significantly boosting the supply of homes'.	No change considered necessary. The objectives as drafted are consistent with NPPF and NPPG and will provide an appropriate strategic planning framework to secure the overall ambitions of the plan. The Growth and Spatial Options paper [02.01.10] justifies the approach to meet housing need.
5	For Strategic Objective 1 to be sound, PfE must allocate significantly more land for housing and reduce the reliance on brownfield sites	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] .

PfE 2021 Objective 2 - Create neighbourhoods of choice

Row	Main Issue	PfE Response
1	Do not support the introduction of a sequential assessment, which requires all brownfield sites to come forward ahead of greenfield as this would not be in accordance with national policy. The development of brownfield sites as a priority or focus (particularly where there is any implied sequential approach) will not deliver neighbourhoods of choice. Within the Core Growth Area and town centres, it will inevitably lead to a concentration of high-density flatted development, which will not lead to balanced neighbourhoods of choice. It will be vital that the plan releases greenfield sites in areas capable of delivering larger family housing and areas of choice for those that do not aspire to town centre living	PfE sets out a clear preference for using previously developed (brownfield) land and vacant buildings to meet development needs. Other than in relation to the site selection process for identifying the strategic allocations, this is not a sequentially preferable priority. Instead the preference for using brownfield land ensures that efficient use can be of the land supply and to keep the release of greenfield and Green Belt land to a minimum. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] .
2	The objective should focus more on prioritising brownfield sites	Objective 2 is clear that the use of brownfield land will be prioritised. This is supported by around 90% of residential development in the plan period being in the urban area, most of which is brownfield land.
3	It is not realistic to focus new homes within 800m of public transport 'hubs' as there are an insufficient number of hubs available with suitable development sites within this distance to allow the objective to be met; further there is little justification for setting 800m as an appropriate distance to focus development. Strategic Objective 2 should instead focus homes within 800m of a public transport link rather than a transport hub.	No change necessary. 800m distance is widely accepted as an appropriate distance for accessing services on foot. For example, the Department for Transport 'Building Sustainable Transport into New Developments' [2008] defines facilities to be within walking distance as within 10 minutes or around 800 metres.
4	Should add an objective to protect and enhance the identity/distinctiveness of settlements.	The objectives are strategic nature, identity and distinctiveness is covered elsewhere in the plan, in JP-P1.
5	Objective 2 relates to creating neighbourhoods of choice and promises to ensure that "there is no increase in the number of homes and premises at a high risk of flooding", this needs to be strengthened to state that this includes the risk of surface water flooding.	The objectives are strategic in nature and more detail is provided in thematic policies. For example JP-S 5 with regard to flooding.

PfE 2021 Objective 3 - Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester

Row	Main Issue	PfE Response
1	In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments and support local services and facilities. The plan should be revised to include objectives and policies which support rural communities and the rural economy	No change is considered necessary. Objective 3 seeks to ensure a diverse range of employment sites and premises, this does not exclude those in rural areas. The Greener Places chapter recognises the role that rural areas play, including in terms of the economy however, as it is not envisaged that these parts of the nine districts will contribute significantly to economic growth, specific reference to the rural economy is not considered necessary, either in the form of a bespoke Strategic Objective or within one of the existing Objectives.
2	Support the objective to ensure a thriving and productive economy in all parts of GM. There is a need to ensure that there is a diverse range employment sites across GM – particularly around Manchester Airport to enable GM to maximise the potential arising from this international asset. To meet this objective, it is imperative that adequate development land is released to meet Greater Manchester's employment needs.	It is considered that the plan provides a sufficient range and quantity of employment sites to meet requirements across the plan area. Further information is found in the Employment Topic Paper [05.01.04] and Employment Land Need in Greater Manchester [05.01.02] .
3	The vast industrial sites proposed to bring jobs to the areas need to be backed up by strong research that ensures it is sited in the correct area and that it is needed	Noted – the justification for the sites allocated for employment land are shown in The Employment Topic Paper [05.01.04] and Employment Land Need in Greater Manchester [05.01.02] papers provide justification for the allocation of land for employment provision.
4	Suggested wording change to 'Prioritise the use of brownfield land to add 'where this does not conflict with other policies in PfE or the NPPF'	No change necessary. We consider the objectives as drafted are consistent with NPPF and NPPG and will provide an appropriate strategic planning framework to secure the overall ambitions of the plan.
5	The Plan as drafted has paid no regard to the impact on employment needs and growth patterns as a direct consequence of the Covid pandemic. Furthermore, we have not seen evidence as to how the GMCA are providing for a diverse range of employment needs, and in locations which the Plan itself identifies as a focus for growth, which is well served by new homes and potential staff	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . Further detail on employment needs is provided in the Places for Jobs Chapter (6).

PfE 2021 Objective 4 - Maximise the potential arising from our national and international assets

Row	Main Issue	PfE Response
1	Support the objective to maximise the potential arising from national and international assets and the objective to focus development at key locations such as Manchester Airport.	Support noted.
2	There is a need to re-address the concept of Manchester Airport with the need to become net-zero carbon contributor. Objective 4 is not consistent with Objective 7 in terms of carbon neutrality and climate change. The plan should be revised to remove inherent contradictions between objectives with regard to sustainability and net zero carbon targets.	As stated in Policy JP-Strat 10, development which is in line with <ul style="list-style-type: none"> - Government policy - Manchester's Local plan policies and - Manchester Airport Group's Corporate Social Responsibility Strategy Will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. The CSR sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038.
3	Concerned by the under recognition of the importance of heritage and the need for the plan 'to set out a positive strategy for the conservation and enjoyment of the historic environment' (NPPF paragraph 190). Lack of a distinct objective on the historic environment and placing it within an objective on weakens its role and importance.	The Historic Environment is covered in strategic terms in objective 4, many policies in chapter 4 and in JP-P1 and JP-P2 and relevant allocation policies. The approach presented in the plan as a whole in relation to the historic environment is considered appropriate in the context of a high level plan such as PfE and provides a sufficiently positive framework for the conservation and enhancement of heritage assets (both in relation to the delivery of policies in the PfE but also through individual district local plans. Therefore the Strategic Objectives are considered consistent with NPPF. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01]
4	The policy is generally supported but suggest strengthening the policy to reflect Greater Manchester's status internationally, nationally, and regionally as an elite and grassroots sports destination, and to provide a link to policy JP-P 7 part 8 (Sport and Recreation). Suggested amendment to include an additional bullet point: "Support new, and enhance our existing sporting assets."	No change necessary. The objectives are strategic in nature and more detail is contained in plan policies such as JP-P 7.

PfE 2021 Objective 5 - Reduce inequalities and improve prosperity

Row	Main Issue	PfE Response
1	Strategic policies that seek to secure delivery of an elevated proportion of housing centrally and in Manchester specifically, alongside suppressed delivery elsewhere including the northern districts, are inconsistent with Objective 5.	Recent government policy (December 2020) has led to an uplift in the housing requirement for major cities such as Manchester. In addition the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. However through policies such as JP-Strat 6 in the PfE do aim to boost the competitiveness of the northern part of the city-region.
2	Building new housing alone will not achieve this - proposals will not reduce inequality and improve prosperity for local residents, houses will be bought by better off people from outside the area to improve statistics.	Comment noted. The PfE forms one way in which this objective will be supported. However the overall aims of the Greater Manchester Strategy will be progressed through a range of delivery partners.
3	Objective 5 does not include any reference to improving equity of access to green spaces for all residents (it should be noted that prosperity is not only measured in terms of financial wealth). In addition, the lack of reference in the Plan to the rural parts of GM, suggests that the inequalities experienced by those residents will not be addressed and their prosperity will not be a focus for improvement.	No change necessary. The objectives are strategic in nature and further detail is contained in thematic policies such as JP-P 7.
4	Objective 5 is weak when GM contains some of the most deprived areas in the country. Could include a wealth tax and redistribution to poorest 10%.	We consider the objectives as drafted are consistent with NPPF and NPPG and will provide an appropriate strategic planning framework to secure the overall ambitions of the plan. Suggested change is outside the scope of a strategic planning document.

PfE 2021 Objective 6 - Promote the sustainable movement of people, goods and information

Row	Main Issue	PfE Response
1	Public transport in Greater Manchester is not reliable enough to displace car usage.	PfE policies and document Greater Manchester Transport Strategy 2040 [09.01.01] sets out our policies and ambitions to improve the public transport network across Greater Manchester. The GMCA has committed to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards. An introduction to Bus Reform is set out in the Transport Topic Paper [09.01.29] .
2	Whilst highlighting the importance of sustainable travel modes in facilitating the PfE growth, where transport network enhancements and improvements are referred to, it is important that significant focus is placed on the road network, including potential enhancements or improvements to the SRN.	Transport Locality Assessments [09.01.07 through to 09.01.29] and Transport Locality Assessment Addendums [09.01.20 through to 09.01.28] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.
3	Do not consider that it is possible to fully meet the City region's development needs in locations that are 800m from sustainable transport hubs. The target is too rigid and does not apply to a number of the PFE allocations already identified. The objective should ensure new employment development is accessible by a range of transport modes. Alternatively, the distance needs increasing to say no more than 2km or the expectation altered to make it clear that not all new development will be within 800m of sustainable transport hubs.	No change necessary. 800m distance is widely accepted as an appropriate distance for accessing services on foot. For example, the Department for Transport 'Building Sustainable Transport into New Developments' [2008] defines facilities to be within walking distance as within 10 minutes or around 800 metres.
4	The objectives are contradictory. You cannot focus development on the airport and key economic locations (i.e. motorway junctions) and at the same time promote carbon neutrality, reduce car dependency and focus development on sustainable transport hubs.	PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the strategic objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan to deliver the strategic objectives. As the Plan should be read as a whole, this approach is considered consistent with NPPF
5	For the reasons laid out within this detailed representation and those put forward by third parties, the draft Places for Everyone report is not sustainable. The Plan is proposing sites for allocation in areas not well located for access to local services and facilities, and a number which are not well related to existing settlements. Sites are proposed in areas at risk from flooding, and a number with poor access to public transport connections.	While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the site allocations have been supported by appropriate evidence base which addresses access to transport connections, services and risk of flooding.

Row	Main Issue	PfE Response
6	Objective 6 needs to be strengthened to ensure all increases in freight traffic are made by rail and shipping. Assets, such as the Manchester Ship Canal to transport freight traffic must be maximised and the Objective should explicitly mention how rural communities will benefit. Suggest adding an additional objective to “optimise opportunities for sustainable movement of freight through the Port of Liverpool via the Manchester Ship Canal”.	No change necessary. The objectives are strategic in nature and more detail is contained in the relevant thematic policies.

PfE 2021 Objective 7 - Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region

Row	Main Issue	PfE Response
1	Do not accept that the ambition to focus growth at the Airport is compatible with being carbon neutral by 2038.	As stated in Policy JP-Strat 10, development which is in line with <ul style="list-style-type: none"> - Government policy - Manchester's Local plan policies and - Manchester Airport Group's Corporate Social Responsibility Strategy will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. The CSR sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038.
2	The objectives and proposed developments do no support aim of carbon neutrality	While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the allocation of the sites are supported by an appropriate evidence base which addresses matters such as those in the representation. Policies contained in Chapter 5 'Sustainable and Resilient Places' cover the approach to carbon neutrality.
3	Strategic Objectives should be re-ordered to make becoming carbon neutral and improving the quality of the environment as the first and second strategic objectives and that all P4E Strategies and Policies be re-assessed against the urgent need to radically reduce climate emissions. Other objectives should be secondary to this aim.	The impact of the climate emergency has been considered in the Integrated Assessment of the Greater Manchester Spatial Framework – Greater Manchester Spatial Framework Scoping Report (2021) [02.01.01] . Although the evidence has been updated, no changes to the IA objectives or criteria are recommended. It is noted that the declaration of climate emergencies by GMCA and the 10 local authorities, is the most significant shift since the previous update to the scoping report. The IA objectives and criteria particularly related to climate emergency have been carefully considered and it is concluded that no additions or changes are required, and that this can be done using the relevant objectives and criteria in the existing IA Framework.
4	Ask that the wording of objective 8 be changed from “facilitate” and “promote” to “deliver”: So to “Deliver carbon neutrality”, “Deliver sustainable patterns of development” and “Deliver provision of infrastructure”	No change necessary. We consider the objectives as drafted are consistent with NPPF and NPPG and will provide an appropriate strategic planning framework to secure the overall ambitions of the plan by our many partners.

PfE 2021 Objective 8 - Improve the quality of our natural environment and access to green spaces

Row	Main Issue	PfE Response
1	The proposed development of new homes would only worsen the quality of the natural environment and destroy habitats. Concerned the plan will not deliver biodiversity net gain.	Several policies in PfE Chapter 8 'Greener Places' detail how the plan will support the natural environment, such as JP-G 9 which states that a net enhancement of biodiversity resources will be sought across the plan as a whole. The Natural Environment Topic Paper [07.01.26] and Habitat Regulations Assessment of PfE [02.02.01] provide further details.
2	Aims to reduce flood risk not met by the number of proposed allocations, which would reduce flood plains and green space and lessen the flood resilience.	No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocations as less vulnerable to flood risk and the need for site specific Flood Risk Assessments [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.
3	Objective 8 should be strengthened to mention that any irreplaceable habitats, such as our ancient woodland and our peat mosses will be considered to be special landscapes (or key features, as described in Policy JP-Strat 13, page 77).	No change necessary. The Strategic Objectives provide a high level steer and more detail is contained in thematic policies including JP-Strat 13 and Policies contained in Chapter 8 'Greener Places' of the PfE plan.
4	Proposed wording addition from "Enhance special landscapes, green infrastructure, biodiversity and geodiversity to add "while delivering a substantial and widespread net gain in biodiversity"	No change necessary. Objectives are strategic in nature and more detail is contained in relevant policies such as JP-G 9. The objectives as drafted are considered to be in accordance with the NPPF and NPPG.

PfE 2021 Objective 9 - Ensure access to physical and social infrastructure

Row	Main Issue	PfE Response
1	Proposals to add housing would add significant pressure to the already stretched transport, schools and healthcare services across the city-region, which would contradict this strategic objective.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.
2	Objective 9 needs to be more specific in identifying how hospital bed capacity, access to health service and social care appointments and school places, will be increased. We can find no mention of a new hospital to address the needs of the 450,000 additional residents the Plan is proposing to build homes for. The Objective should be broadened to state that GM will attract the talent it needs to fulfil these requirements.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.
3	Should provide evidence that clearly sets out in the Plan the confirmed school, hospital and health/social care service provision for the future population of GM	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.
4	The plan is seeking to ensure sustainable development and is therefore consistent with national policy, so long as all allocations deliver sustainable development. If any allocation will not achieve this, or there are uncertainties on its delivery, it should be deleted and replaced with a new allocation that will achieve this, otherwise the plan would not be effective or positively-prepared.	The allocations are justified and supported with a proportionate evidence base. The relevant allocation policies in PfE detail the necessary policy framework / mitigation to ensure development coming forward at those locations will be in accordance with the objectives. Further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF.

PfE 2021 Objective 10 - Promote the Health and Wellbeing of communities

Row	Main Issue	PfE Response
1	<p>This is a laudable objective, but insufficient weight has been given in the plan to the negative impact of loss of green field and Green Belt land on the health and well-being of current and future residents.</p> <p>The loss of greenspace will be detrimental to mental and physical health.</p> <p>The health and wellbeing of the community is directly linked to the green space that surrounds them, the points above also stand for this objective.</p>	<p>While a proportion of development will be on greenfield or Green Belt land, policies in PfE Chapter 8 'Greener Places' such as JP-G 1, JP-G 2 and JP-G 8 show measures to ensure access to green space.</p> <p>Site allocation policies also provide localised mitigation measures and opportunities for environmental enhancement.</p> <p>More detail is contained in supporting information such as GM Green Belt Study – Identification of Opportunities to Enhance the Beneficial use of the Green Belt [07.01.12], Green Infrastructure Policy Context [07.01.01] Guidance for Greater Manchester – Embedding Green Infrastructure Principles [07.01.02].</p>
2	<p>There is nothing in the plan regarding food security, quality, safety and supply. The only PfE reference to food is on p.42 – Objective 10:- “Improve access to healthy food options for all communities”. This praiseworthy aim is just not discussed but locally grown food would be one way of achieving this.</p>	<p>This would be outside of the scope of a strategic planning document. However Policy JP-G 9 states the best and most versatile agricultural land will be safeguarded.</p>
3	<p>Increased pressure on NHS/Doctors facilities goes against this objective</p>	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.</p>

Chapter 4 – Strategy

The main issues raised in relation to the policies within PfE 2021 Chapter 4 - Strategy and the relevant respondents to PfE 2021 is set out below.

Our Strategy

Row	Main Issue	PfE Response
1	The northern parts of the City region need to catch up and should seek to achieve increased targets for employment and housing growth. However, this should not be done at the expense of the south of the city region where there is increased demand for growth.	No change required. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas but also sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The Plan as proposed is therefore considered sound.
2	The PfE will not deliver the ambitions for growth in GM. Contrasting this view is concern that the growth assumptions are also considered to be too high.	No change required. The Spatial Strategy is considered the most appropriate option to meet the ambitions for Growth as set out in PfE Chapters 6 'Places for Jobs' and Chapter 7 'Places for Homes'. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] therefore no change is considered necessary.
3	It cannot simply be assumed that demand for housing will be transferred from the south of GM to the north.	No change required. The PfE Spatial Strategy is very clear that the most significant growth will be in the Core Growth Area, but that increased levels of growth will also be supported in the northern areas. This will boost the competitiveness of northern Greater Manchester and collectively the northern districts will meet about 100% of their local housing need as set out in the standard methodology. This will help to address the north/south imbalance. More information can be found on housing distribution is in the Housing Topic paper [06.01.03] .
4	The strategy is over reliant on high density housing particularly in Manchester and Salford and this will not meet affordable housing needs in the south	No change required. Chapter 4 'Strategy' includes high level policies relating to the overarching PfE Strategy. More detailed policies relating to housing are in Chapter 7 'Places for Homes' and individual allocation policies. Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF.
5	Concern that strategy will only be effective if GM functioned as one housing market area,	No change required. A proportionate level of evidence has been provided on the functioning housing market areas within the Strategic Housing Market Assessment [06.01.02] and the Housing Topic paper [06.01.03] .

Row	Main Issue	PfE Response
6	Insufficient infrastructure to support the proposed developments	No change required. A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole.
7	The Strategy should give full consideration to the ecological emergency and climate change	No change required. Policy S 1 and Policy S 2 seek to tackle climate change and aim to deliver a carbon neutral Greater Manchester no later than 2038 The Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.10] , which has evaluated all policies in terms of their climate change impacts. No change is considered necessary.

PfE 2021 Policy JP-Strat 1 - Core Growth Area

Row	Main Issue	PfE Response
1	The strategy focuses too heavily on growth at the centre of the conurbation, growth should be more evenly spread across the nine districts	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. This has appropriately led to an emphasis on growth at the core of the conurbation. However, the strategy is very clear that growth is proposed in all parts of the conurbation. It boosts the competitiveness of the Northern Areas and sustains the competitiveness of the Southern Areas, including town centres. The overall growth and spatial strategy was derived following the consideration of options, as set out in the Growth and Spatial Options Paper [02.01.10] .
2	The level of growth in the area, particularly in relation to new homes is considered to be too ambitious and overly reliant on an undeliverable land supply and high density development	No change is considered necessary. The Strategy chapter identifies the extent of the land available in the constituent parts of the strategy, it does not detail the targets. Details of the employment and housing targets are provided in Chapters 6 and 7 respectively. It is acknowledged that there are viability challenges with some of the land supply, this is identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] . However, in line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, including building homes at high density, particularly within the Core Growth Area. This means that a significant amount of the land supply identified is in some of the viability challenged areas of the conurbation. Although recent delivery rates demonstrate that the relevant targets within this area are deliverable, an appropriate buffer has been applied to the land supply to address this matter, and issues such as uncertainties arising as a result of Covid-19 and Brexit. Further details on the land supply in the Employment and Housing Topic Papers [05.01.04] and [06.01.03] .
3	Concern that the concentration of development in the core growth area is not supported by appropriate transport infrastructure, this could lead to more congestion both within the city centre and on the Strategic Road Network, particularly the M60 and M602	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. Appropriately, this has led to an emphasis on growth at the core of the conurbation. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . Policies in PfE Chapter 10 set out details on how public transport, walking and cycling will be improved.
4	The level of office development proposed is too high, particularly given that people are now working from home	No change is considered necessary. The level of office development proposed in the Plan is considered consistent with the sustainable location of the core growth area and the wider evidence base, in particular the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] .

Row	Main Issue	PfE Response
5	The policy does not adequately recognise the historic environment	No change is considered necessary. The Plan needs to be read as a whole. Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within the JP-Strat1 area. JP-Strat 1 is an overarching policy, specific references to the historic environment are made in policies JP-Strat 2, 3 and 5.
6	Figure 4.2 of PfE should be amended to reflect the extent of the Core Growth Area more accurately and additional constituent parts of the area should be highlighted/included	No change is considered necessary. All figures in Chapter 4, such as Figure 4.2 are illustrative only. The policies within the chapter provide appropriate guidance for the areas. Further clarity in the map is not considered a soundness issue.

PfE 2021 Policy JP-Strat 2 - City Centre

Row	Main Issue	PfE Response
1	The strategy focuses too heavily on apartment led development in the city centre. Additional sources of housing supply is needed across the nine districts – this would provide a greater range of house types, including affordable housing.	<p>No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. This has appropriately led to an emphasis on growth at the core of the conurbation. However, the strategy is very clear that growth is proposed in all parts of the conurbation. It boosts the competitiveness of the Northern Areas and sustains the competitiveness of the Southern Areas, including town centres. The overall growth and spatial strategy was derived following the consideration of options, as set out in the Growth and Spatial Options Paper [02.01.10].</p> <p>The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p>
2	More evidence is needed to justify that the identified housing supply can provide the scale and mix of housing needed and be deliverable in plan period, particularly when coupled with the finding of the supporting viability evidence, and other issues.	No change is considered necessary. It is acknowledged that there are viability challenges with some of the land supply identified, this is identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] . However, in line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. This means that a significant amount of the land supply identified is in some of the more challenging area of the conurbation. As stated in the Housing Topic Paper [06.01.03] , to address this matter, an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.
3	Policy should reflect changing behaviors in relation to working from home. Not as much office space is needed and many offices are empty.	No change is considered necessary. The level of office development proposed in the Plan is appropriate and has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] .
4	Transport improvements (particularly public transport, cycling provision but also roads) are needed to support growth.	<p>No change is considered necessary. The plan is supported by a range of transport evidence, including the Transport Locality Assessments for all the allocations and the Existing land supply and transport Technical note [see Transport Evidence]. The policies within Chapter 10 'Connected Places' also sets the policy framework for transport improvements and seeks to deliver an integrated and sustainable transport network.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p>

Row	Main Issue	PfE Response
5	Development needs to be supported by sufficient open space and Green Infrastructure to meet the needs of new development.	No change is considered necessary. A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P7 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary. More detailed policies on green spaces for specific areas will also be set out in District Local Plans.
6	The policy does not adequately recognise the historic environment.	No change is considered necessary. The supporting text of Policy JP-Strat 2 is considered to provide sufficient context for a strategic policy of this nature. No change is considered necessary.

PfE 2021 JP-Strat 3 - The Quays

Row	Main Issue	PfE Response
1	Amount of development should be a minimum to allow for additional growth opportunities. The area is an important economic asset with the The Quays being proposed as being a main town centre which has significant economic potential on brownfield land.	No change is considered necessary. The figures quoted in Chapter 4 represent the potential land identified for development, the minimum targets for employment and housing development are set out in Chapters 6 and 7. As detailed in the PfE, should that designation become part of the Salford Local Plan, Salford Quays will be classed as a main town centre. Therefore it is not considered necessary to make any change to the policy.
2	A greater level of evidence is needed, consistent with guidance in the NPPG, to demonstrate the development numbers are deliverable in the Plan period and meet housing needs Consider there are too many apartments proposed which are not affordable.	No change is considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . The PfE seeks to boost the number of affordable homes and specific requirements will be set out in district Local Plans.
3	The areas has poor infrastructure, Metrolink is overcrowded and roads are congested.	No change is considered necessary. New infrastructure will be required to support new development as required. The plan is supported by a range of transport evidence, including the Transport Locality Assessments for all the allocations and the Existing land supply and transport Technical note [see Transport Evidence]. The policies within Chapter 10 'Connected Places' also sets the policy framework for transport improvements and seeks to deliver an integrated and sustainable transport network. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] .
4	There is a lack of greenspaces and trees. Development should therefore be required to provide greenspaces.	No change is considered necessary. The high environmental quality of the Quays will be protected and enhanced through policies in Chapter 5 'Sustainable and Resilient Places' and Chapter 6 'Places for Jobs' with specific requirements considered at detailed planning stage. The Plan should be read as a whole.
5	A large area of the location is in flood zone 2. The policy needs to ensure that high quality design is resilient to future climate change impacts.	No change is considered necessary. Ensuring that development is resilient to climate change is addressed elsewhere in the Plan, in particular within Chapter 5 and will be a matter for consideration at detailed planning stage. The Plan should be read as a whole. The PfE has been subject to a Strategic Flood Risk Assessment (SFRA) which assessed existing land supply sites which are located within the Quays [04.02.01] .

PfE 2021 JP-Strat 4 - Port Salford

Row	Main Issue	PfE Response
1	Policy should refer to the full City Gateway proposal including the City of Salford Stadium, City Airport and Heliport. Figure 4.5 of PfE should be amended to reference this.	No change is considered necessary. City of Salford Stadium (AJ Bell), City Airport and Heliport are not part of the Port Salford employment proposals and it is not considered to be appropriate to widen the area to also include these leisure uses. More information can be found in JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] .
2	Object to development of Green Belt land particularly land between Irlam and Eccles.	No change is considered necessary. The case for exceptional circumstances is explained in the Green Belt Topic Paper and Case for Exceptional Circumstances Appendix 1 and Specifically for Port Salford Appendix 2 page [07.01.25] . The land between the proposed site allocation and Irlam which is currently designated as Green Belt is proposed to be retained as Green Belt in the PfE. For more detail see section 14 in JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] .
3	Proposal will exacerbate existing traffic problems / congestion on the local and strategic road network.	No change is considered necessary. The Port Salford Locality Assessment has looked at worst case scenario for tackling traffic problems, without looking at modal shift. It sets out required transport infrastructure improvements necessary to be delivered to make the allocation deliverable. More detail can be found in section 10 JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] .
4	The delivery of highway improvements cannot be funded entirely by Port Salford.	No change is considered necessary. Policy JP-Strat 4 is a high level strategic policy which is supported by a more detailed allocation policy (JP-A 29). JP-A 29 sets out the policy requirements associated with the proposed development and is supported by an appropriate evidence base. More detail is set out in JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] . The Plan should be read as a whole.
5	More information is required about any operational effects on the Ship Canal and how its use can limit HGV use.	No change is considered necessary. The Manchester Ship Canal is an established freight route and Port Salford is uniquely positioned to capture further opportunities to enable greater quantities of freight to be moved by modes other than HGV with particular opportunities offered by the Canal. The Manchester Ship Canals operation follows appropriate regulations and procedures, which would continue to apply to its operation in this regard in the future. Port Salford would enable greater quantities of freight to be moved by modes other than HGV with particular opportunities offered by the Canal. More detail can be found in section 10 JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] .
6	Concerns relating to environmental impact - loss of agricultural land and loss of peat, habitats and wildlife and effects on air quality.	No change is considered necessary. Paragraph 8.53 states that the Plan seeks to direct development away from valuable soils, but given the overall scale of development required, a limited amount of development is necessary on such land. However, as detailed in JP-A 29, where necessary, specific safeguards are included, such as those within criteria 11, 12, 13, 14 and 15. For more details see JP-A 29 Port Salford Extension Allocation Topic Paper [10.07.71] .

Row	Main Issue	PfE Response
7	Development will have a negative impact on air quality including through increased traffic, rail and the use of ships.	<p>No change is considered necessary. Policy JP-Strat 4 is a high-level strategic policy which is supported by a more detailed allocation policy (JP-A 29). JP-A 29 is supported by an appropriate evidence base and Criterion 22 of the allocation policy requires development to “Implement an agreed strategy for dealing with its local air quality impacts.”</p> <p>Various policies within Greater Manchester’s Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also introducing a Clean Air Zone.</p> <p>Policy JP-S 6 of PfE identifies a comprehensive range of measures that will be taken to support improvements in air quality.</p>

PfE 2021 JP-Strat 5 - Inner Areas

Row	Main Issue	PfE Response
1	It is considered there are significant viability challenges in regenerating much of this land, even with market housing.	No change is considered necessary. It is acknowledged that there are viability challenges with some of the land supply identified, this is in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] . However, in line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. This means that a significant amount of the land supply identified is in some of the more challenging area of the conurbation. As stated in the Housing Topic Paper [06.01.03] , an appropriate buffer has been applied to the land supply to address this. Additionally, not all sites will not be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.
2	A greater level of evidence is needed on how the housing numbers are deliverable given that large amounts of the supply have been available for some time but not come forward. It is considered further sites in the short to medium term are needed until new markets are created.	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently and part of this strategy is building homes at higher densities in urban areas. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] .
3	Growth should be distributed more evenly across the nine districts.	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] .
4	Opposition to development on Green Belt land. It is unclear what alternatives have been considered.	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF paragraph 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. It is considered that a proportionate evidence base has been provided to support this approach. In particular, the exceptional circumstances for development have been provided in the Green Belt Topic paper [07.01.25] and alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.02.10] .

Row	Main Issue	PfE Response
5	New development should be supported by infrastructure to meet its needs.	No change is considered necessary. JP- Strat 5 is a high-level policy, however, a number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P7, JP-C1,JP-C 4, JP-C 5 and JP- D2 which state that new development must be supported by the necessary infrastructure. Specifically in relation to transport matters, more information can be found here: Transport Evidence
6	Concern about how affordable housing is defined and that the housing available, such as high rise, is not truly affordable.	No change is considered necessary. The Plans seeks to make efficient use of land and part of this strategy is building homes at high density. The PfE seeks to boost the number of affordable homes and specific requirements will be set out in district Local Plans. Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. The definitions of affordable housing are in line with NPPF.
7	The need to protect and enhance the natural environment, should apply to all new development.	No change is considered necessary. It is considered that taking this policy as a whole, together with other policies in the Plan, provides sufficient guidance in relation to protecting and enhancing the natural environment within the Inner Areas.

PfE 2021 Policy JP-Strat 6 - Northern Areas

Row	Main Issue	PfE Response
1	Policy does not indicate the scale of growth which is expected across the Northern Areas.	No change is considered necessary. Policy JP-Strat 6 is the overarching, strategic policy for the area and therefore the specific scale of growth is not set out. However, details of the scale of growth in the constituent policies is defined and Chapters six and seven of the PfE Plan set out the overall employment and housing targets with further land supply details being provided in The Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04] .
2	Concern that there is an insufficient number and range of sites in the northern areas to diversify the current housing offer. Question what alternative growth approaches were considered.	No change is considered necessary. As set out in PfE Strategy para 4.1-4.23 the central areas have a significant potential for growth given the existing economic activity and their existing sustainability. Maximising growth opportunities here is in line with NPPF 119 by making the most efficient use of land and prioritising existing brownfield land. The list of sites in paragraph 4.48 is not an exhaustive list of sites within the northern areas. Bolton contributes to the overall strategy in that it meets at least 100% of its local housing need as calculated by the standard method together with three employment allocations and collectively the northern districts meet around 100% of their local housing. The Growth and Spatial Options Paper [02.01.10] and the Site Selection Background Paper 03.04.01 provide further information in relation to alternatives and it is considered sites in the northern areas have been identified in line with the site selection criteria.
3	Other parts of the PfE Plan and Local Plans in the Northern areas should also recognise the ambition for boosting Northern competitiveness.	No change is considered necessary. As stated in para 1.58 of the PfE, the PfE will form part of the relevant authority's development plan. Therefore, the policies within the plan, including those in relation to boosting the competitiveness of the north, will be applied as necessary. Other Chapters in the Plan are considered to reflect this strategic policy particularly Chapters 6, 7 and 11.
4	It is considered the Plan is inconsistent proposing that brownfield sites are preferred but it also proposes development on Green Belt. Opposition to development on Green Belt land. Clarity is needed to show how all brownfield land has assessed for use ahead of Green Belt land.	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. It is considered that a proportionate evidence base has been provided to support this approach. In particular, the exceptional circumstances for development have been provided in the Green Belt Topic paper [07.01.25] . Each district reviews its land supply annually, including optimising the potential from sites within the urban area. Further details of the land supply can be found in the existing land supply in the Housing Topic paper [06.01.03] and MappingGM: https://mappinggm.org.uk/pfe/ . The nine districts will continue to work with site promoters of these sites in relation to securing their delivery.

Row	Main Issue	PfE Response
5	The policy should state need for sites that are capable of delivering new family housing with a view to attracting more aspirational housing, affordable housing and other specialist housing requirements.	No change is considered necessary. Policy JP-Strat 6 states that the mix, type, quality and range of residential offer will be increased in this area. JP-Strat 7 and JP-Strat 8 provide further detail in relation to specific allocations, and this is further supplemented by policies in Chapter 7 'Places for Homes'.
6	Question whether past modelling is the most effective means of working out employment land supply.	No change is considered necessary. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. In addition to this paper, one was also produced in relation to Covid-19 and Brexit: COVID-19 and Places for Everyone Growth Options [05.01.03] which are further explained in the Employment Topic Paper [05.01.04] .
7	New development must address effects on existing infrastructure and provide new infrastructure.	No change is considered necessary. A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-C1, JP-C 4, JP-C 5 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate transport needs, green spaces, schools and medical facilities. In relation to transport infrastructure, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . The Plan needs to be read as a whole.
8	The policy does not adequately recognise the historic environment.	No change is considered necessary. Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within the JP-Strat 6 area. The Plan should be read as a whole, therefore no change is considered necessary.

PfE 2021 Policy JP-Strat 7 - M62 North East Corridor

Row	Main Issue	PfE Response
1	The policy does not increase the residential offer sufficiently to realise the full potential of the North East Growth Corridor.	No change is considered necessary. The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. Collectively the northern districts meet around 100% of their local housing need as set out in the standard methodology. More information can be found in the Housing Topic paper [06.01.03] .
2	Infrastructure capacity issues, including social infrastructure, as well as transport. There are capacity constraints on the M60 and Metrolink and it is unclear how development will make improvements given the lack of proposed highway improvements and public transport routes.	No change is considered necessary. A number of policies elsewhere in the Plan provide a policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Transport Locality Assessments, which support the allocations in this area provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] .
4	The need and scale of development particularly employment land, is considered to be too high. Better use of the existing supply in the urban area could be made without the need for Green Belt release.	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119 (Policy JP- S 1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The economic strategy within the PfE seeks to deliver inclusive growth by identifying a range of sites in a range of locations offering a mix of types of industry. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] .
5	Concerned about the impact on the environment notably air quality, loss of habitat and changes to character of the local area.	No change is considered necessary. Policies elsewhere in the Plan, such as in Chapter 8, Chapter 11 and JP-P1, provide an appropriate framework to specify where mitigation is necessary to address specific adverse impacts and ensure that development is fully integrated, making a positive contribution rather than detracting from its coherence and character.

PfE 2021 Policy JP-Strat 8 - Wigan Bolton Growth Corridor

Row	Main Issue	PfE Response
1	Clarity is needed to show that development is sustainable and meets local housing needs.	No change is considered necessary. The allocations in the Wigan / Bolton Growth Corridor have been identified through the PfE Site Selection process and they meet the overarching PfE Strategy and Objectives – see Site Selection Background Paper [03.04.01] . PfE has been subject to Strategic Environment Assessment , including an Integrated Assessment which has assessed the impact of the plan, including the allocations, against a number of objectives, including those relating to sustainability.
	A higher level of growth in Wigan and Bolton is required to reflect the strategy to create a regionally significant corridor of economic and residential development. There is significant additional potential for more homes and more land allocated.	No change is considered necessary. The targets set in these districts are considered consistent with the overall strategy and the aims and objectives of the plan. Both the allocations and the existing land supply provide sufficient land to meet Wigan and Bolton's housing and employment land needs – see Housing Topic Paper [06.01.03] and the Employment Topic Paper [05.01.04] .
2	Question the ability to deliver the homes stated within the plan period.	No change is considered necessary. The delivery rates are considered to be ambitious, but realistic. They are based on the needs of the area, as well as delivery rates on other similar sites. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] .
3	Development should be on brownfield sites first, before Green Belt. There are too many warehouses proposed along the M6, M61 and M62.	No change is considered necessary. Prioritising the use of brownfield land to meet development needs is a key objective of PfE. However, there are not enough deliverable brownfield sites to meet identified needs and therefore some Green Belt release is required. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper 'Employment Land Needs in Greater Manchester' [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.
4	Concerned that B8 uses in particular will have significant cumulative impact on the Green Belt.	No change is considered necessary. The Green Belt Topic paper [07.01.25] assesses in Appendix 2 the Green Belt harm and mitigations required to address any environmental impact of allocations. Further detail can be found in 'Stage 2 GM Green Belt Study – Cumulative Assessment of Proposed 2020 GMSF Allocations' allocations [07.01.07] and the 2021 addendum [07.01.23] in relation to the effect of the proposed release on the strategic functioning of the Greater Manchester Green Belt. Further details justifying the specific allocations in this area can also be found in the relevant Allocation Topic Papers and Integrated assessment (A).

Row	Main Issue	PfE Response
5	Concern about the impact new development will have on the surrounding road network.	<p>No change is considered necessary. The Transport Locality Assessments supporting the allocations in Bolton and Wigan provide the justification for the link road and other transport infrastructure improvements in this area – see Transport Locality Assessment Bolton [09.01.08] and [09.01.20] and Transport Locality Assessment Wigan [09.01.16] and [09.01.28].</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p>
6	The development will result in the loss of wildlife habitats, some of which are protected.	<p>No change is considered necessary. Policy JP-G 9 ‘A net enhancement of biodiversity and geodiversity’ requires a net enhancement in biodiversity resources across the Plan – this includes protecting sites designated for nature conservation.</p> <p>New Development will also need to provide green spaces in line with Policy JP-G 6.</p>
7	The policy does not adequately recognise the historic environment.	No change is considered necessary. The supporting text of Policy JP-Strat 2 is considered to provide sufficient context for a strategic policy of this nature. No change is considered necessary.

PfE 2021 Policy JP-Strat 9 - Southern Areas

Row	Main Issue	PfE Response
1	Policy does little to rebalance the focus away from southern and central areas.	No change is considered necessary. Policy JP-Strat 9 reflects the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas.
2	More clarity is needed on how sites have been assessed and how brownfield land has been prioritised over Green Belt release.	No change is considered necessary. The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the overall Vision and Objectives of the plan. PfE Policy JP-S1 sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and these sites have been identified in the baseline land supply. However, given the scale of development required to meet the housing and employment land needs a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall Vision and Objectives of the plan
3	Distinctive local neighbourhood character and environmental attractiveness of the southern areas will not be protected and enhanced by building on Green Belt and peat moss.	No change is considered necessary. PfE Policy JP-Strat 9 states that the “distinctive local neighbourhood character of the southern areas will be protected and enhanced.” It also states that development in these locations will be of good quality and design and will seek to improve the local character. Policy JP-P1 ‘Sustainable Places’ also requires development to respond to the natural environment. The individual allocation policies also include specific requirements relating to local neighbourhood character and environmental attractiveness – see JP-A 3.1 Medipark, JP-A 3.2 Timperley Wedge, JP-A 10 Global Logistics and JP-A 33 New Carrington.
4	Concerns over impacts on the SRN of development and airport growth.	No change is considered necessary. The allocations in the Airport area are supported by Transport Locality Assessments which assess the impact of the development and identify a range of transport infrastructure improvements – including sustainable transport infrastructure. See the Transport Locality Assessments – for Trafford [09.01.07/09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] . In addition the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. This relates to both development allocations and commercial sites, like Manchester Airport. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] .
5	Policy should be revised to make it clear that development must actually protect and enhance the natural environment, as opposed to merely seeking to.	No change is considered necessary. PfE Policy JP-Strat 9 is a high-level strategic policy. It is considered that taking this policy as a whole, together with other policies in the Plan particularly policies in Chapter 8 JPG-4, provides sufficient guidance in relation to protecting and enhancing the natural environment.

Row	Main Issue	PfE Response
6	Consider development will have a negative impact on air quality and Climate Change targets, particularly as a result of airport expansion.	No change is considered necessary. PfE Policy JP-Strat 9 is a high-level strategic policy and PfE needs to be read as a whole. As set out in Policy JP-S 6 'Clean Air', Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from airport operations by 2038.
7	Consider New Carrington should be referred to in the same way as Manchester Airport in recognition of its sub regional importance.	No change is considered necessary. Manchester Airport and Altrincham town centre are referred to in recognition of their status as existing assets in the PfE area. However, it is considered that the policy sufficiently recognises the potential of New Carrington through its reference to selective release of Green Belt in key locations and New Carrington is referenced in the Supporting Text, para 4.63 (page 67).

PfE 2021 Policy JP-Strat 10 - Manchester Airport

Row	Main Issue	PfE Response
1	The development around the airport and the proposed allocations are in conflict with PfE objectives for carbon neutral development / climate change mitigation. Effects on air quality are a particular concern.	No change is considered necessary. Manchester Airport is considered to be one of the key assets in Greater Manchester and the Spatial Strategy seeks to capitalise on existing assets which genuinely distinguish Greater Manchester from its competitors in its approach to allocating land for development. This is set out in more detail in the Growth and Spatial Options Paper [02.01.10]. The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the overall Vision and Objectives of the plan. PfE Policy JP-Strat 10 is a high-level strategic policy and PfE needs to be read as a whole. The policy has been appraised through the IA which took into consideration these matters see PfE IA Scoping Report 2021 [02.01.01] and IA Main Report [02.01.02] .
2	There is too much proposed office space at the airport. Unused office space across Manchester should be used instead.	No change is considered necessary. The level of office development proposed in PfE has been informed by the Employment Land Needs in Greater Manchester [05.01.02] . Although the majority is within the Core Area other locations are also required.
3	Concerns about the proposed allocations on Green Belt.	No change is considered necessary. PfE Policy JP-S1 sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and these sites have been identified in the baseline land supply. However, given the scale of development required to meet the housing and employment land needs a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall Vision and Objectives of the plan The case for exceptional circumstances is explained in the Green Belt Topic Paper and Case for Exceptional Circumstances [07.01.25] Appendix 1. See also Allocation topic papers for JP- A 3.1 Medipark [10.01.57] , JP-A 3.2 [10.01.58] and JP-A 10 Global Logistics [10.04.03] .
4	Concern about carbon emissions increasing due to growth of Manchester Airport.	No change is considered necessary. Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038. The carbon emissions associated with Manchester Airport are beyond the scope of this Plan.
5	The strategy may cause significant pressure on the M56 corridor, and the policy does not refer to the implications on the SRN.	No change is considered necessary. The Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN. All allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the sites. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.

Row	Main Issue	PfE Response
6	Needs to be greater clarity in relation to how anticipated growth from Manchester Airport, Airport City and the HS2 Airport connection is likely to impact on development needs and environmental impacts in Cheshire East.	<p>No change is considered necessary. Through cross boundary collaboration, the relevant PfE districts and TfGM have been working with Cheshire East Council to ensure that development proposed is cognisant of developments in Cheshire East.</p> <p>As a neighbouring authority and duty to cooperate body Cheshire East Council have signed the relevant sections of the PfE Statement of Common Ground reflecting this.</p>

PfE 2021 Policy JP-Strat 11 - New Carrington

Row	Main Issue	PfE Response
1	Concerned about delivery on the site given lack of substantial housing or employment delivery to date. Additional sites should be allocated if development does not come forward.	<p>No change is considered necessary. Part of the Carrington area was identified in Policy SL5 of the Trafford Core Strategy 2012, this location was focused on the brownfield land area of the previous industrial uses. The PfE New Carrington allocation extends significantly beyond this area and proposes additional housing and employment development.</p> <p>Since the adoption of the Core Strategy several housing and employment sites are now being delivered within the SL5 area. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p> <p>The PfE New Carrington Masterplan considered the likely delivery rates for a site of this scale and the figures included in PfE are considered to be realistic and deliverable. See JP- A 33 New Carrington Allocation Topic Paper [10.09.07] Section E 'Deliverability' and New Carrington Masterplan [10.09.06] Section 5.8 'Development Phasing'.</p>
2	Significant concern about existing congestion issues on the road network and implications of new development on the SRN.	<p>No change is considered necessary. Policy JP-Strat 11 states that development will need to be supported by major investment in transport infrastructure. This includes the proposed Carrington Relief Road which will provide additional capacity and ease congestion on the existing A6144. Further detail on the transport infrastructure requirements is in Policy JP-A 33 New Carrington and the New Carrington Transport Locality Assessment [09.01.15] and [09.01.27]. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p>
3	Concern about the need for the proposed Carrington Relief Road.	<p>No change is considered necessary. The Carrington Relief Road is a longstanding proposal for the Carrington area, which has been identified in previous Trafford Local Plan documents, including the Core Strategy, 2012. The route is identified as an infrastructure requirement in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27].</p>

Row	Main Issue	PfE Response
4	Significant COMAH and gas pipe constraints across the site which will restrict development.	<p>No change is considered necessary. GM -Strat 11 is a high level policy and further detail on the site constraints and development parcels is set out in the Policy JP-A 33 New Carrington and supporting documents.</p> <p>The various COMAH and gas pipe constraints have been taken into account in the New Carrington Masterplan and this has informed the proposed development quantum for these areas. See New Carrington Masterplan [10.09.06] and JP-A 33 New Carrington Allocation Topic Paper [10.09.07] – section 13.3 Hazardous Installations and section 28 Indicative Masterplan.</p>
5	Significant concern about the large scale of the allocation and its effects on the character of the locality and loss of wildlife habitats.	<p>No change is considered necessary. Policy JP-Strat 11 states that new development will be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character. JP-Strat 11 is a high level policy and therefore does not specify policy protections for wildlife habitats, however PfE should be read as a whole. Policies in Chapter 8 and Policy JP-A 33 New Carrington include a number of policy protections for the natural environment. Further information is also in the New Carrington Allocation Topic Paper [10.09.07] – section 19 Ecological/Biodiversity Assessment.</p>
6	Objections relating to the loss of mossland, which should be retained for its biodiversity value and as a carbon store. The conservation of organic soils will also help to reduce carbon emissions.	<p>No change is considered necessary. The proposed New Carrington allocation will provide family and affordable homes in a strategically important location which could deliver significant regeneration benefits to the area. The harmful impacts of this development are considered to be offset by the provision of a significant area of green space within the allocation – this relates to both the Green Belt through the centre of the site, as well as the strategic green spaces at Sale West. Policy JP-A 33 (criterion 33) requires the restoration and creation of wetland areas within the site.</p> <p>Further work will be required to assess the depth and extent of any peat within the site, to ensure that the most valuable areas are retained as part of the wider green infrastructure strategy. The findings of this will then inform the detailed Masterplan.</p> <p>Policy JP-G4 outlines the importance of mossland for their habitats and wider landscape. There is a strong emphasis in the Plan on their retention and improvement.</p>

PfE 2021 Policy JP-Strat 12 - Main Town Centres

Row	Main Issue	PfE Response
1	Towns need to become distinctive, local and unique places. Investment is required to allow town centres to compete and they need revitalising, not just redeveloping.	No change is considered necessary. PfE Policy JP-Strat 12 is a high-level strategic policy. Policy JP-P 4 supports the role of the main town centres as local economic drivers that will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Other policies in the Plan will ensure development will be carefully managed to ensure that the local distinctiveness of each main town centre is retained and enhanced. Opportunities will also be taken to protect and enhance natural and historic assets in the town centres. Additionally further guidance will be provided as appropriate in district local plans.
2	Some of the main town centres are in close proximity to the SRN. The potential for increased traffic pressure should be acknowledged on both the SRN and within town centres.	No change is considered necessary. Any impact of proposals on the SRN will be considered as part of the planning application process, and through strategic modelling. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026.
3	The policy needs to set out clear requirements for developers as regards the commercial and retail offer and on where transformation should take place in Town Centres, as well as identifying funding.	No change is considered necessary. Policy Strat 12 sets the high level strategic policy for the main town centres. Policy JP- P 4 sets out the hierarchy for Town Centres supporting the role of the main town centres as local economic drivers that will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Unlike for housing need, there is no standard methodology for calculating employment land need or commercial or retail offer. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. District Local Plans will set out specific requirements on the extent and nature of residential provision.
4	The policy does not adequately recognise the historic environment.	No change is considered necessary. The supporting text of Policy JP-Strat 2 is considered to provide sufficient context for a strategic policy of this nature. No change is considered necessary.
5	The Revised Draft Salford Local Plan proposes to designate The Quays as a ‘Main Town Centre’. It should in JP-Strat 12.	No change is considered necessary. Policy JP-Strat 12 already covers this issue and states that should Salford Quays be designated as a town centre in the Salford Local Plan.

PfE 2021 Policy JP-Strat 13 - Strategic Green Infrastructure

Row	Main Issue	PfE Response
1	Create new green spaces if brownfield sites are not suitable for development.	No change is considered necessary. Policy JP-G 6 supports working with developers and other stakeholders to deliver new high quality urban green spaces. This can include appropriate brownfield land.
2	Green spaces, lowland wetlands and mosslands assets should be protected and not built on.	No change is considered necessary. PfE Policy JP-Strat 13 is a high-level strategic policy. Policies within the Greener Places Chapter 8 provide the overall strategic policy approach to protecting green infrastructure. Additionally, specific references are made in the relevant allocation policies, as appropriate, to mitigate impact on green infrastructure. The Plan should be read as a whole and no changes are considered necessary
3	The list of green infrastructure assets should include hedgerows, as well as other natural environments that are legally protected and locally important environments.	<p>No change is considered necessary. Policy JP-G 4, which is linked to JP-Strat 13, seeks to increase features that act as stepping stones for wildlife such as hedgerows and trees. Whilst it is considered that reference to hedgerows could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.</p> <p>The Green and Blue Infrastructure Study that is summarised in paragraphs 3.2 to 3.22 of the Natural Environment Topic Paper (07.01.26) explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected due to their strategic scale and ability to deliver strategic-scale improvements to the delivery of ecosystem services for large areas of Greater Manchester. It is considered that this is a proportionate and justified evidence base to support the policy. Hedgerows do not form an opportunity area, but are likely to be present in the opportunity areas that have been identified.</p> <p>Protection of hedgerows are subject to separate regulations under the Hedgerows Regulations 1997 and is not a matter for the Places for Everyone Plan.</p>
4	Grasslands should be included within the listed strategic green infrastructure assets.	No change is considered necessary. JP-Strat 13 is a high-level strategic policy The protection and enhancement of grassland is included within Policies JP-G 3, JP-G 4 and JP-G5. Therefore no change is considered necessary.
5	Green Infrastructure assets should be shown on District Local Plan maps.	No change is considered necessary. PfE is a strategic plan and Policy JP-Strat 13 sets out the Strategy for Green Infrastructure assets. Policies within the Greener Places chapter then set out more detail. The Plan should be read as a whole And it not necessary or appropriate to determine the scope of Local Plans in the PfE. That will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'.

PfE 2021 Policy JP-Strat 14 - Sustainable and Integrated Transport Network

Row	Main Issue	PfE Response
1	The current network needs to be better integrated and public transport connectivity needs to be improved.	No change is considered necessary. JP-Strat 14 is a high-level strategic policy and further detail regarding how public transport, walking and cycling will be improved and how better integration will be achieved is set out in the Connected Places chapter. JP-Strat 14 should also be read alongside the GM transport strategy documents - GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] .
2	The cumulative effect of new developments will make congestion worse. Public transport networks should be funded and prioritised over road improvements prior to development being completed to achieve modal shift.	<p>No change is considered necessary. The cumulative effects of development have been assessed in the transport evidence and specific schemes have been identified to support development in the existing land supply and the allocations. Full details of the transport evidence supporting PfE is available here: Transport Evidence. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p> <p>The target in Policy JP-Strat 14 that half of all daily trips can be made by public transport, cycling and walking is in line with the strategies and projects outlined above. The policy also supports that new development will have a significant role in delivering our future sustainable and integrated transport network. Policy JP-C 1 supports delivery of development that encourages sustainable transport usage and it also supports transport infrastructure that meets customers’ needs by being integrated, reliable, resilient, safe and secure, well-maintained, environmentally responsible, attractive and healthy.</p>
3	Public transport outside of the Regional Centre is inadequate and does not provide a credible alternative to the private car. Bus services particularly in rural areas are being reduced.	No change is considered necessary. Policy Strat 14 is a high level policy. More detailed policies can be found in Chapter 10 ‘Connected Places’ and Allocations chapters. Allocation policies include details on transport infrastructure to support specific allocations. The Plan should be read as a whole.
4	The policy should cross reference other relevant transport policies in PfE plan and planned investment. This should then carry through to showing these on District Local Plan maps.	No change is considered necessary. Policy Strat 14 is a high level policy. More detailed policies can be found in the Connected Places and Allocations chapters. The Allocation policies include details. The Plan should be read as a whole. It is not necessary or appropriate to determine the scope of local plans in PfE that will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 on transport infrastructure to support those specific allocations which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’.

Chapter 5 – Sustainable and Resilient Places

The main issues raised in relation to the policies within PfE 2021 Chapter 5 – Sustainable and Resilient Places and the relevant respondents to PfE 2021 is set out below:

PfE 2021 Policy JP-S 1 Sustainable Development

Row	Main Issue	PfE Response
1	Lack of consideration of climate change objectives.	No change considered necessary. In line with NPPF, this policy, combined with policies relating to Sustainable Transport (Chapter 10), Carbon and Energy (JP-S2), Heat Networks (JP-S3), Clean Air (JP-S6), and Green Infrastructure (JP-G2) are considered to provide an appropriate strategy to help meet climate change objectives. It is considered that a proportionate evidence base has been provided to support the policy as reflected in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01] . The effects of climate change is a key issue against which the plan is assessed within the Integrated Assessment; see the Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208, Integrated Assessment of the GMSF Main Report 2020 [02.01.02] page 2, Integrated Assessment of the GMSF Main Report 2020 [02.01.02] page 2, Integrated Assessment of the PfE Plan and Integrated Assessment of GMSF Addendum [02.01.05] pages 3 and 4.
2	This policy implies a sequential approach to site selection and that previously developed land will take precedence over the development of greenfield land. This is inconsistent with national policy.	No change is considered necessary. In line with the NPPF, the PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum, see the Growth and Spatial Options Paper [02.01.10] . In addition, the site selection paper [03.04.01] sets out the process followed to identify allocations in the PfE, including consideration of multiple sites to meet the identified needs.
3	The policy does not adequately recognise the historic environment.	No change is considered necessary. The Plan should be read as a whole. The protection and enhancement of the historic environment and its assets is enshrined throughout PfE and more specifically Section 8 Places for People, Policy JP-P 2 Heritage and Policy JP-P 3 Cultural Facilities, and is considered to be consistent with paragraph 190 of the NPPF. It is considered that a proportionate evidence base has been provided to support the policy as evidenced in The Historic Environment Background Paper 2020 [08.01.12] and individual site allocation historic environment assessments, where appropriate [08.01.01-08.01.11] .

PfE 2021 Policy JP-S 2 Carbon and Energy

Row	Main Issue	PfE Response
1	Concern that proposed development on GM peatlands goes against this policy for carbon reduction.	No change considered necessary. In line with Greater Manchester's move towards becoming carbon neutral by 2038, Policy JP-S2 part 6 encourages a range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, in line with the national objectives. In relation to new development, Policy JP-G9 at paragraph 8.53 recognises that while development would ordinarily be directed away from valuable soils, given the overall scale of development that needs to be accommodated, a limited amount of development on higher grade agricultural land / peatlands is necessary.
2	Achieving zero net carbon emissions by 2038 is overly optimistic when compared to the UK wide target of 2050 and not consistent with government policy, and too onerous.	No change is considered necessary. Policy JP-S2 is a strategic policy, considered to be consistent with the NPPF. The proposed policy approach is a stepped approach and a proportionate evidence base has been provided to support the policy as set out in the Carbon and Energy Topic Paper [04.01.05] . This includes research carried out by The Tyndall Centre (paragraph 3.24, pages 39 and 40 of Carbon and Energy Topic Paper), and Currie and Brown / Centre for Sustainable Energy (pathway approach, compliance with building regulations, costs metrics and implementation) pages 46-52 of Carbon and Energy Topic Paper [04.01.05] . Paragraph 9.3 of Carbon and Energy Policy Implementation Study [04.01.01] pages 190-191. JP-S2 makes reference to this, in paragraph 5.11.
3	Lack of carbon mitigation costs in the PfE viability work. There is no consideration for the carbon off-setting costs nor the costs of on-site policy compliance or energy costs.	It is considered that a proportionate evidence base has been provided to support policy JP-S2, as a Strategic Viability Assessment [03.03.03] has been undertaken (see Technical Appendices 2020 page 5). The Strategic Viability Assessment Part 1 considers the costs of carbon mitigation relating to policy JP-S2, [03.03.01] , pages 29-30 and pages 63-65 consider the viability and technical appendices [03.03.03] page 5. This is further supplemented by the Carbon and Energy Implementation Plan Part 1 [04.01.01] pages 163-184 and Part 2 Carbon Offsetting [04.01.02] . Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore no change is considered as necessary.
4	Lack of evidence to support policy.	No change is considered necessary. Policy JP-S2 is a strategic policy. Consistent with the NPPF, it sets out a robust policy framework for Carbon and Energy. The policy is supported by an appropriate and proportionate evidence base, considering measures to deliver a carbon neutral Greater Manchester. Further details of which can be found in Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Part 1 [04.01.01] and Part 2 [04.01.02] and the Integrated Assessment Scoping Report 2021 [02.01.01] and Integrated Assessment Main Report [02.01.02] and Main Report Addendum [02.01.05] .

PfE 2021 Policy JP-S 3 Heat and Energy Networks

Row	Main Issue	PfE Response
1	Policy is too prescriptive and should set out when it is acceptable for new development to not connect to heat / energy networks.	The policy wording within JP-S3 is considered flexible enough to allow a varied approach to low carbon heat and energy master planning, including consideration of technical and economic viability. Therefore no change is considered as necessary.
2	Unrealistic and unsound policy as there is a sparse network of heat and energy networks currently and therefore a limited chance to adhere to the policy.	No change considered necessary. PfE paragraph 5.20 highlights that government analysis identifies heat/energy networks as a cost effective solution to the issue within areas of high heat density; and an important part of least-cost technologies to achieve UK wide decarbonisation. It is considered that a proportionate evidence base has been provided to support the policy as set out in the Carbon and Energy Topic Paper [04.01.05] and Figure 3: the Low Carbon Opportunity Zones pages 38-39 and government paper: The Future of Heating page 59-73.
3	The viability of this policy has not been tested.	It is considered that a proportionate evidence base has been provided to support the policy JP-S3 as a strategic viability assessment has been published alongside the Plan. The Strategic Viability Assessment Part 1 considers the costs of carbon mitigation relating to policy JP-S3, [03.03.01] , paragraph 4.6, pages 29-33 , also see the Technical Appendices 2020 [03.03.03] page 5 and Carbon and Energy Policy Implementation Study [04.01.01] (pages 163-171). Therefore, in line with NPPF, it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore no change is considered as necessary.

PfE 2021 Policy JP-S 4 Resilience

Row	Main Issue	PfE Response
1	Plan is unsound. Site allocations are unable to meet the tests of resilience.	No change is considered necessary. PfE is considered to have been prepared in accordance with legal and procedural requirements and is considered to be sound. PfE allocations policies are considered to be in accordance with JP-S 4 and the Plan's commitment for a resilient Greater Manchester, being supported by appropriate evidence as necessary.
2	The proposed policy covers a wide range of issues identified within NPPF, which are broadly welcomed but it isn't a clear policy and it duplicates other parts of the plan.	No change is considered as necessary. JP-S 4 as a strategic policy contributes towards the Plan's aim for Greater Manchester to be one of the most resilient places in the world (PfE paragraph 5.24), is considered to be supported by a proportionate and appropriate evidence base and in accordance with paragraphs 97, 130, 152 and 153 of the National Planning Policy Framework. It will be a matter for individual districts to determine the scope and detail of policy components as part of the decision making process at the local level in line with NPPF paragraph 28.
3	The historic environment should be referenced in the policy to avoid harm to it.	No change is considered necessary. PfE sets out the strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. The importance of the historic environment has been assessed within The Historic Environment Background Paper [08.01.12] , individual site allocation historic environment assessments [08.01.01 - 08.01.11] and set out specifically in Policy JP-P 2.
4	The release of the Green Belt for development, the use of areas of high agricultural quality and resulting impact on air quality, pollution, flood risk and climate change will undermine this policy. The focus should be on the re-use of previously developed (brownfield) land and vacant buildings.	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with paragraphs 119 to 120 of the National Planning Policy Framework. The release of greenfield and Green Belt land has, however been kept to a minimum. The site selection paper [03.04.01] sets out the process followed to identify the allocations and the Green Belt Topic paper [07.01.25] the exceptional circumstances. In addition the plan should be read as whole as Policy within Section 6 Places for Jobs, Section 7 Places for Homes, Section 8 Greener Places Policies JP-G 1 to JP-G 11 and Section 9 Places for People provide an appropriate and complementary policy framework to achieve the plans overall vision and objectives.

PfE 2021 Policy JP-S 5 Flood Risk and the Water Environment

Row	Main Issue	PfE Response
1	Policy JP-S 5 lacks detail and needs greater clarity as to how each of the policy components will be assessed as part of decision making.	Policy JP-S 5 is considered to provide an appropriate strategic policy framework to manage flood risk across the Plan wide area and is supported by a proportionate and appropriate evidence base. An amendment to the policy is not considered as necessary.
2	Concern that new development including site allocations are proposed in areas prone to flooding, could increase the risk of flooding elsewhere and how climate change has been factored in.	No change is considered necessary. Policy JP-S 5 is considered to be consistent with NPPF paragraphs 159 to 169 and provides an appropriate strategy to manage flood risk at a strategic level. The site selection process [03.04.01] , (paragraph 6.44) for the PfE includes the consideration of flood risk and site allocations are supported by a proportionate evidence base. This includes the Greater Manchester Strategic Flood Risk Assessment Level 1 [04.02.01] , Greater Manchester Strategic Flood Risk Assessment Level 2 [04.02.18] , Greater Manchester Flood Risk Management Framework [04.02.17] and Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] . Additionally applications should, where appropriate, be supported by a site-specific flood-risk assessment in line with paragraph 167 of the NPPF and planning guidance.
3	Concerns in relation to the impact of the policy on the historic environment.	No change is considered necessary. PfE sets out the strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. The importance of the historic environment is recognised within The Historic Environment Background Paper [08.01.12] , individual site allocation assessments [08.01.01 to 08.01.11] and Policy JP-P 2 relating to Heritage.
4	Further consideration should be given to a flexible 'natural based solutions' approach in relation to sustainable urban drainage systems.	No change is considered necessary. PfE provides an appropriate strategy to protect the quantity and quality of water bodies and to manage flood risk at the strategic level by incorporating the outcomes and recommendations of the Stage 1 and Stage 2 Strategic Flood Risk Assessments. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support Policy JP-S 5 which has identified a wide range of measures at the strategic level to manage flood risk including Sustainable urban Drainage Systems (SuDS) (policy points 4 and 5). At the detailed level, local planning authorities need to ensure that flood risk is not increased elsewhere. Applications should, where appropriate, be supported by a site-specific flood-risk assessment (FRA) in line with paragraph 167 of the NPPF and planning guidance . The FRA should identify site specific flood mitigation measures, including but not limited to SuDS, necessary in relation to the proposed development including its design and layout.
5	Concern that proposed development on Greater Manchester's peatlands/ mosslands goes against this policy in terms of the impact of climate change on flood risk.	No change is considered necessary. The site selection process [03.04.01] , paragraph 6.44] for PfE included the consideration of flood risk. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support the development of PfE and further detail in relation to site allocations can be found within the relevant allocation topic paper [10.01 to 10.10] .
6	Policy should set out that applications will be required to submit a foul and surface water drainage strategy that fully investigates the surface water hierarchy to minimise flood risk in	No change is considered necessary. PfE sets out strategic planning policies for the overall strategy of the nine districts and should be read as a whole. Policy JP-D 1 point 7 requires that 'development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility infrastructure capacity, from first occupation until development completion' and that 'where potential capacity problems are identified and no improvements are

Row	Main Issue	PfE Response
	a sustainable way whilst being resilient to the challenges of climate change.	programmed by the relevant infrastructure provider, we will require the developer to contribute to and/or facilitate necessary improvements'.
7	Requirement for new development to be built to optional water efficiency standards prescribed by Building Regulations.	Water efficiency measures in new developments will be a matter for district local plans or further guidance to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.

PfE 2021 Policy JP-S 6 Clean Air

Row	Main Issue	PfE Response
1	Concern over existing poor levels of air quality in parts of Greater Manchester affecting health of residents.	Policy JP-S6 is a strategic planning policy. Consistent with the NPPF it is considered to set out an appropriate policy framework for Clean Air. Evidence is set out in Carbon and Energy Topic Paper [04.01.05] , the GMCA and TfGM GM Low Emissions Strategy Here (page 9) and the HRA relating to Air Quality [02.02.02] . The policy will be used to guide development across the plan area, as appropriate. The Plan needs to be read as a whole, therefore no change is considered necessary.
2	An increase in traffic due to proposed development in PfE will increase pollution and damage the environment.	No change considered necessary. As set out in paragraph 5.49 of the PfE, the primary focus is on transport given its primary contribution to air pollution. Regard should be had to transport policies elsewhere in the plan. Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. This is evidenced in the Greater Manchester Transport Strategy 2040 [09.01.01] pages 32-36 and Transport Delivery Plan 2021-26 [09.01.02] paragraph 19, page 9; and Right Mix Technical Note [09.01.03] and HRA relating to Air Quality [02.02.02] .
3	The requirements set out in the policy are too onerous, such as requirements to provide electrical charging points for vehicles.	No change is considered as necessary. It is considered that a proportionate evidence base has been provided to support policy JP-S6. A strategic viability assessment has been undertaken (see Strategic Viability Assessment Part 1) which considers the costs of policy requirements. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.

PfE 2021 Policy JP-S 7 Resource Efficiency

Row	Main Issue	PfE Response
1	Concerns that the aims of this Plan undermine this policy; particularly development on the Green Belt. Look to use under-used and undeveloped land instead; such as retail car parks and offices.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . All sites that are available, suitable and likely to be viable in accordance with paragraph 68 of the NPPF have been identified in the housing land supply spreadsheet [03.03.01] . Therefore no change is considered necessary.
2	Objection to requirement to have facilities to process waste on site; a balanced approach should be taken to design; viability alongside deliverability.	A change to the policy is not considered necessary. Clarity is provided in paragraphs 5.53-5.56; waste planning will continue to be undertaken through Greater Manchester Joint Waste Strategy 2012 and Greater Manchester Zero Waste Strategy. Therefore no change is considered as necessary. The policy is considered to be supported by a proportionate and appropriate evidence base, including A strategic viability assessment (see Strategic Viability Assessment Technical Appendices 2020 [03.03.03]). Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
3	Lack of evidence in relation to Minerals and Waste. Greater Manchester Minerals Plan is out of date and it is clear from local aggregate assessments that there are insufficient resources available.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Paragraph 5.52 of PfE states that annual monitoring of mineral extraction and changes in likely future needs will inform whether and when an update of the joint minerals plan is required, including as a result of the growth in development set out in this plan. Therefore no change is necessary.

Chapter 6 – Places for Jobs

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 6 – Places for Jobs is set out below:

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	NPPF compliance/ exceptional circumstances: PfE does not evidence or justify that exceptional circumstances exist to change Green Belt boundaries. In particular, comments made specifically in relation to the employment needs evidence base, namely the margin/buffer applied to need should be reduced to align with evidence and reflect the lower need. As such, PfE is not compliant with paragraphs 140-141 of the NPPF.	<p>It is considered that the Publication Plan is in line with NPPF. In relation to para 140-141, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Given the lack of sufficient land to ensure that our overall housing and employment needs can be met, it is considered that there is a strategic exceptional circumstances case to be made to release Green Belt for development. However, this release has been kept to the minimum and has been done in locations which will help to meet our overall vision and objectives. The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25].</p> <p>In relation to comments made in regard to the evidence base, the Employment Land Needs in Greater Manchester document [05.01.02], page 9-10] provides rationale for the applied margin. The methodology applied to calculate employment needs has been prepared based on the evidence and is therefore fully justified.</p>
2	Change from GMSF to PfE: It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before “Places for Everyone” can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write.	As stated at paragraph 1.22 of the Places for Everyone Plan, the impact of the five different changes between the GMSF2020 and the PfE2021, together with that of their cumulative impact was considered and it was determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations. No change is considered necessary.
3	Scale of Development/ impact of Covid-19/ Brexit: The amount of employment floorspace proposed is excessive/ incorrect/ flawed when compared to the evidence presented, especially in terms of predicted job losses. It will lead to over-provision which can increase vacancy rates, competition for business between neighboring authorities and lead to areas becoming blighted.	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is not considered that there will be an over provision of employment land as a result of the policies in the plan, rather the supply will ensure long-term provision is identified to meet future needs.</p> <p>It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and the need to have sufficiently attractive sites and premises to meet the overall ambitions</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	The assumptions used to determine employment land supply requirements overestimates the requirement and doesn't take into consideration market signals, past completion/ take up rates or predicted future impacts on the industry (I.e. increased automation, more working from home and a downward trend in demand for office space). The impacts of the Covid-19 pandemic and Brexit on employment land supply or needs have not been assessed.	of the Greater Manchester Strategy and Local Industry Strategy. See also supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04] . As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . As such, the policy is considered sound.
4	Commensurate Housing Provision Employment growth is not supported by sufficient housing provision, in type/ quantity/ location. An under-provision of homes will result in an insufficient local labour supply; leading to unsustainable levels of inward commuting; further pressure on the regions road and public transportation networks and increases in per capita carbon emissions. No analysis has been provided to assess the impact that the proposed housing strategy will have upon the baseline supply of employment land.	The housing need has been calculated using the standard methodology as set out by NPPF - further information on the housing need methodology is provided in the Housing Topic Paper [06.01.03] . PfE identifies a range of new housing sites, in a variety of locations. The varied mix of sites, supported by the necessary infrastructure will provide the right level and mix of homes needed to support the economic growth.
5	Location of Employment Land Provision: The policy seeks to maximise the potential of key growth locations in the northern conurbations, with the aim of securing investment in these locations to help raise their competitiveness. In south Manchester in contrast, employment land releases are poorly provided for, with the Plan's focus on supporting economic activity in town centres and around Manchester Airport. Within the evidence base there has been no consideration of the characteristics, relative growth potential or market dynamics in the different parts of Greater Manchester, and in particular in South Manchester – which should be a fundamental when considering the appropriate distribution of employment land provision across GM.	It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. It is appropriate for the overall land supply targets set out in both JP-J 3 and JP-J 4 to be based on the employment land need figures, derived from the evidence base. The land supply data set out in tables 6.1 and 6.2 demonstrates that sufficient land has been identified over the course of the Plan to meet this need. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01] ; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04] . The spatial strategy of the Plan (Chapter 4) seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. As is set out in paragraph 4.21 the areas identified within the spatial strategy [illustrated in figure 4.1 'Spatial Strategy, page 48] do not have firm boundaries and are likely to evolve over time.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6	Climate Change: PfE hasn't modelled the impact of the carbon emissions of the plan. The plan needs to be rewritten taking into account proper research into employment needs and investment potential with proper safeguards to protect greenbelt and climate change agenda. Development will lead to increased carbon emissions, negatively impacting on air quality, increasing traffic. In particular, expansion of the Airport will also lead to poor air quality and increased carbon emissions.	The Sustainable Development (JP-S 1), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address climate change. This chapter of the Plan (Chapter 4 'Sustainable and Resilient Places') is supported by an extensive evidence base. The Carbon and Energy Topic Paper [04.01.05] provides a summary of this evidence [see chapter 3 'Local Policy and Evidence', pages 24-62]. In relation to Manchester Airport, JP-Strat 10 sets out measures for addressing climate change issues as part of its development. When the plan is read as a whole no change is considered necessary.
7	Approach / Strategy: There's limited alignment between the Greater Manchester Economic Strategy and the location of employment sites.	The vision, objectives and spatial strategy contained in PfE are guided by the Greater Manchester Strategy, in fact they share a common vision. The economic strategy in PfE complements that within the Local Industrial Strategy. The strategy maximises the potential of key growth locations across the conurbation, which collectively meet the strategy. These locations range from core conurbation areas such as the City Centre, the Quays and Trafford Park to new areas that will boost the competitiveness of the north, such as Heywood/ Pilsworth (Northern Gateway) and locations such as the Manchester Airport Enterprise Zone which will help to sustain the competitiveness of the south. It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] sets out the methodology for selecting the strategic allocations. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.
8	Job types: Green Belt is mainly being released to cater for growth in logistic operations; these typically provide lower skilled, lower value employment opportunities, and fewer jobs per hectare than other industrial and warehousing uses such as advanced manufacturing. Jobs won't be for local people.	<p>The Greater Manchester Strategy and Local Industrial Strategy sets out ambitions to deliver good quality, high- skilled jobs. PfE seeks to provide land to meet the widest range of employment opportunities to ensure Greater Manchester remains as competitive as possible and provides sites for advanced manufacturing, digital and tech jobs, for example, at Heywood/Pilsworth (Northern Gateway). The scale of growth which PfE intends to deliver is set out within Chapter 5 'Places for Jobs' of the Plan. Types of jobs are listed in JP-1B This is informed by evidence set out within the Employment Topic Paper [05.01.04] and the Economic Forecasts for Greater Manchester Paper [05.01.01].</p> <p>Criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that employment growth opportunities are well connected and accessible to all residents. It is considered that the employment allocations and the existing baseline supply across the plan area will provide a range of employment opportunities in various sectors. Local Plan's (and their evidence base) may provide further policy/ analysis on their borough's key sectors and employment opportunities.</p>
9	Alternative uses: The policies restrict employment areas being used for alternative uses, which is in conflict paragraph	The plan has been prepared in accordance with NPPF. It is important that there is some protection of employment land to ensure the employment needs of the plan area can be met. Whilst the protection of employment areas is supported

Summary of Main Issues Raised – Chapter 6 – Places for Jobs

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	122 of the NPPF 2021 which states where there are no reasonable prospects of an application coming forward for allocated uses, applications for alternative uses on the land should be supported providing the proposed use would contribute to meeting an unmet need for development in the area. Alternative uses, such as residential, should be allowed if necessary and should not be restricted by the policy or Article 4 Directions (referenced in policy JP-J3).	through PfE, any decisions on redevelopment of employment land will be dealt with through the normal planning process at a local level in line with Local Planning Policies. In relation to Article 4 Directions, the policy provides flexibility allowing for local authorities to take any decisions on the undertaking of Article 4 Directions as appropriate based on local circumstances. In any case, permitted development rights exist allowing some changes of use in permitted areas. As such, no change is considered necessary, and the policies are considered to be sound.
10	Infrastructure: The plan fails to identify any infrastructure to accommodate the growth planned within the urban area. The plan will have a detrimental impact on health and wellbeing of existing communities as a result of congestion, overcrowding, insufficient social infrastructure and loss of green spaces that are well used by existing communities. Insufficient detail on how the substantial infrastructure that is needed will be financed.	Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future, is a key theme throughout the plan. We consider that the plan will help us not just drive our economic recovery from the Covid-19 pandemic, but to build a better future for everyone in our boroughs. There are a number of policies in the Publication Plan that provide a sufficient policy framework to address infrastructure provision, such as policies JP-G6 Urban Green Space; JP-P5 Education, Skills and Knowledge; and JP-P6 Health; JP-P7 Sport and Recreation. Supporting these are the overarching policies of Policy JP-P1 Sustainable Places, which sets out key attributes that all development, wherever appropriate, should be consistent with including being supported by critical infrastructure, such as energy, water and drainage and green spaces; and Policy JP-D2 on Developer Contributions. The Plan needs to be read as a whole, therefore no change is considered necessary.
11	Sustainability: Insufficient consideration has been given to climate change, wildlife and biodiversity.	As stated in Places for Everyone para. 5.7 climate change is a key theme running throughout the plan, rather than being reduced to a single policy, and it is only through this combination of actions that it can be properly addressed. Policy JP-G9 expects development to follow the mitigation hierarchy. Development will also be expected to achieve a net gain in biodiversity.
12	Rural Economy: The Policies do not consider the Employment Sites and Premises needed to support the Rural Economy, meaning it is not Positively Prepared, Justified or Consistent with National Policy. The Policies should be updated to include reference to the Employment Sites and Premises needed to support the Rural Economy and a new section should also be added to this Plan to support this requirement (after Industrial and Warehousing Development).	Chapter 4 'Strategy' of PfE identifies the Plan's approach to achieving the vision of the Greater Manchester Strategy. This chapter identifies the key growth areas, as is illustrated in Figure 4.1 'Spatial Strategy' and listed under paragraph 4.21. JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play across the PfE area, including in terms of the economy. When the plan is read as a whole no change is considered necessary.
13	Deliverability of sites: There's no evidence that the deliverability of the strategic employment/mixed-use	A strategic viability assessment, [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	allocations within these two northern corridors has been assessed.	applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Deliverability is discussed within the Site Allocation Topic Papers. There is a Topic Paper for each allocation.
14	Appeal Decisions: PfE is in contravention of the Aireborough judgement in instances where the land requirement is a contributing factor to exceptional circumstances.	It is considered that the exceptional circumstances case set out in the Green Belt Topic Paper is lawful and provides a proportionate evidence base to justify the approach. The set of circumstances presented in legal case of Aireborough vs Leeds is different to those in relation to PfE.

Chapter 7 – Places for Homes

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 7 – Places for Homes is set out below:

Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	Housing targets: The LHN calculated using the standard method should be treated as a minimum starting point for determining how many more homes need to be planned for. The housing need figure should be further uplifted to support economic growth, increase affordable housing delivery and to reflect the levelling up agenda.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. We do not consider that exceptional circumstances exist to justify departure from the standard methodology. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.
2	Housing targets: A lower total than the LHN would be justified by consideration of: utilising the latest population and household forecasts; the impact on Green Belt; the impact of Covid-19 and Brexit; and average household size. PfE is planning for around 1 home per additional person.	Please see above. Green Belt issues have been considered as summarised in the Green Belt Topic Paper [07.01.25] . As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . The Greater Manchester Strategic Housing Market Assessment [06.01.02] section 4.6 identifies a particular increase in one person households and other multi-adult households. The reduction in the average household size means that more homes would be required even if there was no increase in population.
3	Change from GMSF to PfE: In the 2019 consultation Manchester and Salford were absorbing housing need, reducing the loss of Green Belt. As a result of the 35% cities and urban centres uplift, Manchester is no longer absorbing housing need for the boroughs, who are now propping up the buffer through GB allocations. This is a significant change from the approach that formed the basis for the It is difficult to see how progressing to a Regulation 19 consultation is legal.	The move from GMSF to PfE is dealt with elsewhere. As stated in the Housing Topic Paper [06.01.03] para. 6.28, the City of Manchester is meeting 100% of its LHN (including the 35% cities and urban centres uplift). No Green Belt release is required to meet any unmet housing need from the City of Manchester. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.
4	Spatial distribution: The proposed redistribution does not align with the key objectives of the plan, will do little to assist in the regeneration of GM and will worsen affordability and economic growth.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE

Summary of Main Issues Raised – Chapter 7 – Places for Homes

		<p>Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas.</p> <p>The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts and was also found to perform the best in the Integrated Appraisal of the plan. The targets set out in the plan will deliver the strategy, therefore no change is necessary.</p>
5	<p>Phasing: Reference to the stepped requirement should be removed. They are unjustified and will result in rapidly increasing house prices, worsening affordability, homelessness and poverty. The early years of PfE are crucial for addressing past under delivery and responding to the shock of the Covid-19 pandemic. The stepped target tries to push housing requirements to later in the plan period, with the intention of being able to artificially claim a 5-year supply of land. Additional deliverable and viable sites need to be allocated to ensure that a 5-year supply is provided on adoption (assessed against LHN).</p>	<p>Disagree. As stated in para.7.16 - 7.18 of the Places for Everyone plan, it is considered appropriate to identify a phasing trajectory which is realistic and which will result in housing being delivered as planned over the life of the plan. The approach to stepped targets is considered to be robust, supported by proportionate evidence and consistent with NPPF and NPPG.</p> <p>The land supply trajectory is considered to be realistic based on widely accepted lead in times and delivery rates for greenfield/ Green Belt sites, the viability challenges presented by some of the brownfield land supply and the need to develop new markets for housing in some parts of the conurbation, which is vital to delivering the overall strategy but may take some time to achieve. As identified in the Housing Topic Paper [06.01.03], sufficient housing land, together with an appropriate buffer, has been identified to meet the identified needs of the PfE districts.</p> <p>Therefore no change is considered necessary.</p>
6	<p>Existing housing land supply: There is insufficient information to enable judgements about the suitability, availability or deliverability of the supply, or about the assumptions used to create the trajectory set out in the HLSS. There is insufficient evidence for the inclusion of sites within the 5 year supply. The evidence base lacks vital components including a SHLAA. There is a lack of consistent approach to the district SHLAAs, which have not been published as part of the evidence base.</p>	<p>No changes necessary. The existing housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01].</p> <p>Although each district undertakes their own SHLAA as they are best placed to do this having the local knowledge and necessary resources, we do have a standard approach based on the methodology set out in Planning Practice Guidance on Housing and economic land availability assessment. All the districts undertook standard optimisation work as set out in the Housing Topic Paper [06.01.03] Appendix A.</p>
7	<p>Existing housing land supply: The plan significantly overestimates the capacity and deliverability of the baseline supply of housing land, and therefore significantly underestimates the level of Green Belt housing allocations required. There is an overreliance on brownfield land and unallocated sites which may not come forward, and significant doubts about the viability of a substantial proportion of the supply.</p>	<p>Sufficient housing land has been identified in to meet the needs of the plan area up to 2037.</p> <p>The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF. As a result a significant amount of the land supply identified is in some of the more challenging areas of the conurbation, and as identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. There are a broad range of opportunities to support the delivery of more challenging sites, as set out in the Housing Topic Paper [06.01.03] para. 6.40 to 6.77. Therefore no change is considered necessary.</p>

8	Existing housing land supply: A comprehensive review of land supply should be undertaken. The minimum density specifications are not being fully delivered, which has the knock-on effect of placing more pressure on the Green Belt and undermining the core objectives of the plan.	As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts in line with NPPF and NPPG. In compiling this districts have considered the requirements of the density policy alongside other factors in assessing the availability and deliverability of sites to be included within the SHLAA. Achieving the densities may not always be possible (where sites have planning permission for example) and lower densities may be acceptable where they can be justified.
9	Other allowances: There is no consistency in making an allowance for losses. While all have included a windfall allowance, only some authorities have balanced this out by making predictions of the likely future losses. The approach to windfall allowances from small sites is inconsistent and there is insufficient evidence to support the approach taken.	The approach to losses and small sites windfalls is considered to be consistent with National Planning Policy and is justified by evidence set out in the Housing Topic Paper [06.01.03] Appendix A section 7.2 and 7.3.
10	Other allowances: There is a strong historical trend of large windfall sites coming forwarded but the plan makes no allowances for this. It is logical to accept that more windfall sites will become available as a result of Brexit and Covid 19. An allowance for this should be made.	As set out in the Housing Topic Paper [06.01.03] Appendix A section 8.2 no specific windfall allowance is currently proposed for such sites as part of the land supply due to the inherent difficulties in calculating what an appropriate allowance would be for all districts due to lack of consistent and comparable data on past trends. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
11	Green Belt: All brownfield sites should be developed before any green spaces are used. There is insufficient focus on previously developed land.	No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach. We are however adopting a 'brownfield preference' policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. Given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
12	Green Belt: The proposed allocations are not sufficient to ensure that the housing needs of GM will be met. More land will be required to deliver family housing and housing suitable for other groups. Additional Green Belt and greenfield sites must be identified to give a more diverse and deliverable supply of land.	As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN of the 9 districts. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN. Therefore, it is considered that the strategy is appropriate and Places for Everyone identifies sufficient land to meet the joint plan

	Stating that a stepped target is required is an acknowledgement that the requirement for a good range of sites has not been met.	<p>area's housing need over the plan period, as identified by the Greater Manchester Strategic Housing Market Assessment [06.01.02].</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. Part of this strategy is building homes at high density, particularly within the Core Growth Area. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.</p> <p>We consider that the NPPF requirements have been met. The land supply identified in the plan is considered to be sufficient to meet both the identified needs and the overall vision and objectives of the plan. No change necessary.</p>
13	Covid-19: The Covid-19 pandemic has caused significant changes to housing demand in terms of location and size as a direct result in the shift towards home working. This is considered to be a long-term change, resulting in higher demand for larger homes with outside space and access to green space in more rural areas. It is therefore considered that the housing strategy no longer remains appropriate.	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>Notwithstanding this, in accordance with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Alongside the spatial strategy, the Plan also provides an appropriate policy framework to secure a range of housing type, size, design and density. Therefore, it is considered that the strategy is appropriate and Places for Everyone identifies sufficient land to meet housing needs over the plan period.</p>
14	Buffer: In light of the deliverability and viability concerns, a buffer of at least 20% should be provided for. Sufficient flexibility needs to be provided in the supply to ensure that there is a realistic prospect of the housing requirements being met, taking market vulnerabilities into account.	As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. All districts have a buffer of at least a 35% in the early years of the plan. This approach, together with regular reviews of the land supply and the Plan, will enable the overall spatial strategy to be met, whilst reflecting the challenges in terms of the uplift in LHN and represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.
15	Buffer: Concern in relation to the identified housing need and the fact that the Plan appears to be seeking to over-provide for housing land.	<p>No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need of 164,880 over the plan period calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts.</p> <p>As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. An overall buffer of 16% across the plan area is considered reasonable, and is not a sign that excess land has been identified, but is in fact necessary to demonstrate that the targets can be met, particularly in light of the viability challenges presented in the Strategic Viability report.</p>
16	Infrastructure: The plan fails to identify sufficient infrastructure to accommodate the growth planned within the urban area.	A number of policies in the Plan provide a sufficient policy framework to address infrastructure provision, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.

	<p>The plan will have a detrimental impact on health and wellbeing of existing communities as a result of congestion, overcrowding, insufficient social infrastructure and loss of green spaces that are well used by existing communities.</p> <p>Insufficient detail on how the substantial infrastructure that is needed will be financed.</p>	<p>The policies within Chapter 12 identify an appropriate strategy and mechanisms to secure the necessary infrastructure required to support the growth proposed in the Plan. Additionally, the relevant allocation policies are supported by a proportionate evidence base, detailing the infrastructure required to support the development. Further details of which can be found in the relevant allocation topic papers.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>
17	<p>Sustainability: Insufficient consideration has been given to climate change, wildlife and biodiversity.</p>	<p>As explained in Places for Everyone para. 5.7 climate change is a key theme running throughout the plan, delivering a combination of actions which will address climate change. In particular Policies JP-S2, JP-S3, JP-S4 , JP-S5 'Flood Risk and JP-S7. Additionally this was a matter given specific consideration through the Integrated Assessment, for further details please see the Scoping Report [02.01.01]. Policy JP-G9 expects development to follow the mitigation hierarchy and provides an appropriate strategy to achieve a biodiversity net gain, and is considered to be consistent with NPPF.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary</p>
18	<p>Housing needs of specific groups: There is no quantitative assessment of the future need for care facilities and student accommodation.</p>	<p>The Greater Manchester Strategic Housing Assessment [06.01.02] Chapter 6 provides information on the future need for care facilities and student accommodation.</p> <p>As stated in Policy JP-H3 housing provision to accommodate students will be addressed through district local plans.</p>
19	<p>Housing needs of specific groups: The Plan is silent on Gypsies, Travellers and Travelling Showpeople. It should be clarified that PfE is not covering this matter and it will be for the 10 local authorities to pick this up at a district level and review the GMGTAA.</p>	<p>As stated in Policy JP-H3 housing provision to accommodate specific groups, such as travelling people, will be addressed through district local plans.</p>

Policy JP-H 2 Affordability of New Housing

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	<p>Adjustment: The adjustment applied to local housing need to take account of affordability (an extra 1,218 homes per annum) will barely have an effect on the affordability of homes in Greater Manchester.</p>	<p>No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02]Chapter 3.2 Standard methodology : Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provide detailed information on the need for affordable housing in Greater Manchester. As with previous methods for assessing housing need, the methodology states that an adjustment should be made to consider market signals, specifically the affordability of housing. The effect across Greater Manchester of the application of step 2 is to increase the annual housing need figure by 15% to 10,305</p>
2	<p>Housing requirement: Setting a housing requirement that goes no further than the standard method only serves to embed and</p>	<p>No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14), the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	compound current affordability issues (particularly in Bury, Trafford and Stockport where housing needs will be under-provided for).	local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.
3	<p>Affordable stock and deficit: GMCA should look at the current affordable housing stock and assess whether it matches current and future affordable housing needs; and plan for any deficit to be met. Concerns in relation to criteria 2 and 5 as an overall housing delivery rate of 30%, as aimed for in the Housing Strategy means that they consider proposed Policy JP-H2 to be optimistic. Data indicates that an average of about 5% was delivered between 2011/12 and 2019/20. Subsequently requests Policy JP-H-1 establish that the housing delivery number is a minimum and add a mechanism to allow for an uplift if required within the Plan period.</p>	<p>No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 4.4 (Pages 86 to 100) Dwelling stock profile provides a profile of the current dwellings in Greater Manchester.</p> <p>The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future. The delivery of at least 50,000 affordable dwellings is considered to be an ambitious target for all of Greater Manchester which features in the GM Housing Strategy – though it is not a ceiling on delivery. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, and can be achieved via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>For further information, the Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the affordable housing requirement in Greater Manchester.</p>
4	<p>Housing target: In order for Manchester’s affordable housing need to be met in full it will be necessary to plan for at least an additional 2,200 affordable homes per annum across Greater Manchester (and around 243,000 homes in total). The affordable housing requirement is much greater than the annual housing target being planned for by the PFE plan. A higher overall housing requirement is needed to increase the prospect of delivering 50,000 affordable homes (because as it stands every site will have to deliver 25% affordable housing on average). Increasing the overall housing requirement</p>	<p>No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02]. Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the need for affordable housing in Greater Manchester.</p> <p>The PfE Plan does not include an ‘affordable housing requirement’. The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building delivered through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	would lower that proportional target, making it more achievable on a site by site basis.	<p>The planning system is not the sole mechanism by which affordable housing is provided and it is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system, nor that new build will be the only route to secure additional affordable homes. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing.</p> <p>It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 provides more information on the mechanisms available to deliver affordable housing alongside the planning system</p>
5	<p>The Strategic Housing Market Assessment : The Strategic Housing Market Assessment (SHMA) identifies that the actual affordable housing need figure presented in the SHMA is 88,638 affordable homes over the course of the plan period in the 9 Council areas. The PfE only plans for a minimum of 50,000 affordable homes (equating to approximately 30% of the total annual housing requirement) which represents a significantly lower figure than that identified in the SHMA, and there is no evidence provided in the PfE to justify this departure from the evidence base and falling significantly short of meeting the existing need. The SHMA also identifies a number of other mechanisms that could deliver affordable housing, although the PfE is not clear at any stage how it intends to utilise these methods to address the deficit between the identified need of affordable housing, and the delivery of affordable housing on mixed-tenure development schemes.</p>	<p>The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future. The delivery of at least 50,000 affordable dwellings is considered to be an ambitious target for all of Greater Manchester which features in the GM Housing Strategy – though it is not a ceiling on delivery. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, and can be achieved via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>For further information, the Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the affordable housing requirement in Greater Manchester.</p>
6	<p>Viability: Concerns about the extent of the housing land supply that is already unviable for market housing, which casts doubts about the ability of the large proportion of the supply to provide affordable housing. Comments state that it will be challenging to achieve any affordable housing on previously developed land given cost constraints and limited viability headroom (especially after the</p>	<p>No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The Strategic Viability</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	significant additional policy burdens proposed by the GMSF are accounted for). Requests that the policy should acknowledge the need to reduce affordable housing requirements where viability considerations undermine deliverability.	Assessment Stage 1 2020 [03.01.01] and 2021 Addendum [03.01.02] identifies challenges with our land supply and this is acknowledged within the plan by the provision of a land supply 'buffer'. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 . Furthermore, not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.
7	Viability of apartments for affordable housing: Concern that there is an increasing focus on apartment development to meet affordable need even though the Viability Assessment confirms that much of this supply is unviable, even at only 20% AH delivery.	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 . Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.
8	Viability and deliverability evidence: There is no evidence to demonstrate that 50,000 affordable homes are viable and deliverable across the sources of housing land supply identified.	It is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing as well as other sources such as Community Land Trusts. Affordable housing can also be delivered via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance. The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] and Places for Everyone Strategic Viability Assessment Stage 1 Report Addendum 2021 [03.01.02] outline the GMCA's position regarding viability, with chapter 5 (pages 17 to 18) providing an update on the housing land supply position. The Housing Topic Paper [06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
9	<p>Viability:</p> <p>The adopted benchmark land values, costs and profit levels are actually underestimated so the dire position in regard to viability which is presented in the SVA is actually worse than stated and the published viability evidence suggests that barely 6% of the proposed supply could be affordable homes, circa 10,200 in total or less than 640 per annum over the plan period. This equates to only 12% of the calculated annual need for affordable housing and would also represent a more than halving of the recent trend seen since 2012.</p>	<p>No changes necessary. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.</p>
10	<p>Definition: The GMCA should use Government's definition of affordable housing (as set out in national planning policy). Concern that without a ridged definition developers will not be consistently held accountable and housing will not be affordable.</p>	<p>No changes necessary. In Policy JP-H2 Affordability of new housing, at Footnote 88, we confirm that the definition of different forms of affordable housing is given in Annex 2:Glossary (Page 64) of the NPPF.</p> <p>In relation to student accommodation, Policy JP-H 3 Type, Size and Design of New Housing states that provision to accommodate specific groups, such as students, will be addressed through district local plans.</p>
11	<p>Definition and delivery of affordable housing : Public concern that housing will not be affordable in the first instance for the low paid, and that housing will be executive 4 and 5 bedroom homes. There is the impression that what the government deems affordable is not affordable and affordability should be measured against local circumstances. There is a concern that developers will deliver no affordable housing on valuable Green Belt land citing viability issues, with reference to track record of developers.</p>	<p>No changes necessary. Increasing the supply of affordable homes is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations. Policy JP-H2 sets out our approach to affordability of new housing, and where relevant detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE)</p>
12	<p>Covid-19 Pandemic :</p> <p>The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid. Given the uncertainties pertaining much of the identified housing land supply and the unknown effects of the Covid-19 pandemic on the delivery of sites, viable sites need to be incorporated into the buffer, to ensure that affordable housing needs are going to be met</p>	<p>No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
13	Conflict with JP-H 1's strategy: Concern that the scale, distribution and phasing of new development endorsed under Policy JP-H 1 will not address any immediate shortfalls in affordable housing delivery given the approach taken to suppressing supply in the early parts of the plan period, as part of a staggered approach, which we consider is unjustified and not consistent with the NPPF for reasons set out above.	No changes necessary. Introducing stepped targets is an appropriate mechanism to use in plan making. The factors for determining the stepped targets in Greater Manchester include the need to be realistic at the start of the plan period in terms of the level of masterplanning and infrastructure provision required for the larger more complex sites and also the need to take account of the challenges facing some of the urban land supply compounded by the uncertainties introduced by the Covid pandemic and the UK exit from the European Union. Furthermore besides delivery of affordable housing on mixed-tenure development schemes, there are also several other mechanisms that could deliver affordable housing including funding programmes from Homes England, including their Shared Ownership and AHP and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts (CLTs) may also deliver new affordable housing.
14	Brownfield: Affordable new housing can be fully attained using vacant homes and brownfield sites	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need. Chapter 5.8 of the] assesses the vacancy levels across the conurbation in 2019. Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement.
15	Affordability of Student Accommodation: PBSA in Manchester is among the most expensive but worst quality in the country, therefore growth should be regulated by Greater Manchester Combined Authority to assure standards. A requirement for a minimum number of rooms in PBSA to be affordable to students should be added to this policy. In addition to a requirement for affordable rooms, a requirement for a nominations agreement would ensure that universities can prioritise rooms for students most in need. Requests for a suitable clause to be added to the policy to address affordability of student accommodation similar to the London Plan such as a requirement for a minimum number of rooms in PBSA to be affordable to students should be added to this policy.	The Greater Manchester Strategic Housing Market Assessment . [06.01.02] at Chapter 6.7 sets out the housing needs of Students. Policy JP-H 3 Type, Size and Design of New Housing states that provision to accommodate specific groups, such as students, will be addressed through district local plans. Furthermore, Policy JP-H2 outlines that locally appropriate affordable housing requirements are to be set by each local authority. Therefore no change to the wording of this policy is considered necessary.

Policy JP-H 3 Type, Size and Design of New Housing

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	<p>Demand and supply of apartments compared to larger family homes:</p> <p>The evidence base for the PfE does not identify that 60% of housing need is for apartments and the PfE's household projections wrongly assume that past trends of households forming within apartments will continue by underplaying the need for family housing in order to limit the release of land suitable to meet those needs (i.e. greenfield and Green Belt sites). Apartments will not satisfy the demands of Manchester's growing population for larger family homes and the Plan is over-reliant on the delivery of apartments. This will result in a significant over-supply of apartments and an under-supply of houses; in direct conflict with demographic and market evidence about the shortcomings of the current housing stock and the pressing need to broaden the choice and range of homes available, i.e. by providing larger family housing in locations that will attract and retain skilled workers.</p>	<p>No changes necessary. The Plan seeks to make efficient use of land to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. The Strategic Housing Market Assessment [06.01.02] looks at the composition of population growth and forecasts for smaller households.</p>
2	<p>Viability of apartments: There is no evidence that it will be viable to develop 59% of the housing supply across the PfE area as a whole as apartments as envisaged in Table 7.3. The conditions in the urban core do not apply to the outer boroughs, some of which have unrealistic proportions of apartments proposed. Smaller household sizes do not necessarily translate into demand for apartments where larger dwellings are sought to facilitate home working or accommodate visiting relatives. This means 97,280 of the proposed homes in the PFE plan will be apartments compared to 67,601 houses. This is an incredibly high number and proportion of apartments that is simply not justified in the evidence, which shows that no more than 20% of homes need to be apartments.</p>	<p>No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] The Strategic Viability Assessment Stage 1 2020 [03.01.01] and the Stage 1 Report Addendum 2021 [03.01.02] provides sufficient evidence and informs our position related to viability.</p>
3	<p>Issues with the Strategic Housing Market Assessment: The SHMA completely omits any consideration of the need for different sizes or types of housing. The Greater Manchester SHMA Update 2021 provides an overview of the change in household types over the plan period, based on</p>	<p>No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	the latest 2018-based SNHP, but it does not provide any conclusions as to the split of apartments/dwellings that should be provided by district, and it certainly does not attempt to estimate how many 1, 2, 3 or 4+ bed properties are needed across the study area. As such, any attempt to assess or justify the proposed mix of housing types is fundamentally compromised.	
4	<p>Issues with the Strategic Housing Market Assessment: Given the SHMA is based on a far lower level of apartments (25%) than that now proposed (59%), and acknowledges that this mix will only deliver 20% of the required AH through market led delivery; this raises serious questions as to the level of affordable delivery that will be achieved with over more than double the proportion of apartments, given these are known to generate viability issues. This indicates that , in order to meet the target 50,000 units GMCA and its partners will need to seek alternative forms of delivery.</p>	<p>No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester’s housing need.</p> <p>Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites</p> <p>As stated within the Housing Topic Paper [06.01.03] at Chapter 3 (paragraph 3.22), there are a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties.</p>
5	<p>Effect of supply on affordability: A relative oversupply of apartments will make family homes less affordable (constraining the supply of family housing will compound competition for family homes in desirable areas, thereby driving up prices, and forcing skilled workers to leave Greater Manchester in order to access affordably priced family housing within a reasonable commuting distance of their place of work).</p> <p>Given the SHMA is based on a far lower level of apartments (25%) than that now proposed (59%), and acknowledges that this mix will only deliver 20% of the required AH through market led delivery; this raises serious questions as to the level of affordable delivery that will be achieved with over more than double the proportion of apartments, given these are known to generate viability issues. This indicates that , in order to meet</p>	<p>The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03. Further details in relation to housing need, including affordability can be found in the Strategic Housing Market Assessment [06.01.02].Through the delivery of affordable housing in line with Policy JP-H2 and Policy JP-H3, we will seek to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations, helping to ensure that Greater Manchester can attract and retain skilled workers, bring more money into local economies and deliver more mixed and inclusive communities. Therefore no changes are considered necessary.</p> <p>Furthermore, as stated within the Housing Topic Paper [06.01.03] at Chapter 3 (paragraph 3.22), there are a number of other mechanisms which could deliver affordable housing. These include a wide range of funding</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	the target 50,000 units GMCA and its partners will need to seek alternative forms of delivery.	programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties.
6	Housing for Older People: For an ageing society a wide range of housing options will be needed across both private and social housing sectors, from retirement properties, to supported housing options such as extra care, to innovations such as co-housing. The failure to plan for a sufficient number of homes will significantly hamper efforts to ensure that a genuine mix of dwelling types, and sizes, including specialist housing for older households and vulnerable people, can be delivered.	No changes necessary. Policy JP-H3 ensures that development across the plan area will seek to incorporate a range of dwelling types including specialist housing for older households and vulnerable people. includes housing for older households and vulnerable people. This is also considered at paragraph 7.32 of the Plan.
7	Meeting the needs of different groups: Concerned that this housing land supply will not relate to the needs of all different groups in the community, with a reduction in the range of variety of homes provides	No changes necessary. Policy JP-H3 will improve the range and variety of homes provided. It states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Where appropriate, this should include incorporating specialist housing for older households and vulnerable people. The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Housing provision to accommodate specific groups, such as students and travelling people, will be addressed through district local plans. Supporting evidence informs this policy, specifically the Strategic Housing Market Assessment [06.01.02] which provides detailed evidence in relation to Greater Manchester's housing need.
8	Precise Mix: Object to the assumption outlined in Policy JP-H 3 that the precise mix of dwelling types and sizes will be determined through district local plans. Precise mix cannot be left to Local Plans. Mix needs to be understood now so that it can be factored into the overall strategy. Policy should be amended so that it sets out the precise mix now, it is a strategic issue which directly links to housing land supply and GB release. Consider there is a need to release additional land in the outer parts of the conurbation to address the need for family housing.	It is considered appropriate for the precise mix of dwelling types and sizes to be determined through district local plans as set out in Policy JP-H3.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
9	Question whether the inclusion of Table 7.3 is justified if individual local planning authorities are to determine their own type, size and design of new housing.	No changes necessary. The land supply tabulation is set out in Table 6.4 of the Housing Topic Paper [06.01.03] and is based on the 2020-2037 housing land supply (which was the latest data available at the time of plan preparation) combined with the supply on PfE site allocations. It is considered that this provides a proportionate evidence base to support the strategic policy aims of Policy JP-H3
10	Evidencing Space and Accessibility Standards: National guidance is clear that where the nationally described space standards or universal use of the ‘accessible and adaptable’ standard is proposed, this must be substantiated by evidence. There is insufficient evidence to justify a policy requiring compliance with NDSS and certainly not across the board on all new residential development. The Combined Authority are advised to revisit this and undertake the appropriate evidence gathering if they propose to continue with such a policy.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]
11	Viability of Space and Accessibility Standards: It should be borne in mind that the use of the standards incurs costs and that these may run counter to other objectives of the Spatial Framework. Paragraph 7.33 states that “cost considerations for both developers and households are placing further downward pressure on dwelling size”. These will not be resolved by only allowing the construction of larger properties. Give the viability issues identified across much of Greater Manchester in the Strategic Viability Assessment, the likely result will be to reduce housing completions.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03] Furthermore, Paragraph 4.2.7 of the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] confirms that an alternative approach to calculating residential land values which ensures that the value estimates used for the study reflect actual market behaviour has been utilised to avoid any issues (sometimes expressed by the development industry around price points) when using the Nationally Defined Space Standards to derive an average house size.
12	Space and Accessibility Standards relationship with JP-H 4: Should give careful consideration to the Policy JP-H3 requirement for all new dwellings in Greater Manchester to comply with the nationally described space standards having regard to the impact upon achieving the proposed Policy JP-H4 (Density of New Housing)	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]
13	Relationship with JP-H 1: Concern that Policy JP-H3 is in fundamental conflict with H1 and Strategic Objective. The reason for the tension is explicit in paragraph 7.30, which refers to the intention to maximise the amount of development on brownfield locations and minimise the loss of greenfield land. Whilst this is not objectionable in itself, the issue is how	It is considered that policy JP-H3 is not in conflict with Policy JP-H1.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	this is balanced with other land-use planning objectives, in addition to the question of whether the strategy will be effective under Policy JP-H1.	
14	<p>Design: Concern that at a strategic level the changes since 2019 to the NPPF with a much greater emphasis on design quality (paragraph 8b and Chapter 12), the mandatory use of Design Codes and striving to achieve beautiful places have not been reflected within the Plan.</p> <p>Furthermore, given the recent pandemic there is increasing momentum for a high-quality design agenda and matters such as well-being, enjoyment of private and public open space and enhanced connectivity through the urban environment are expected to be key considerations. There is also a trend for households to want to live in larger dwellings to facilitate home working or to accommodate visiting relatives. It is therefore no longer simply a case of solely being able to build high density schemes to help meet the districts housing requirements and question whether a sole reliance on high density housing in city centre locations will help meet the aims of the Building Better, Building Beautiful Commission report and the Place Alliances Place Value & the Ladder of Place Quality report. PfE should review its housing need so ensure the right range of house types are provided across the district, rather than focusing on city centre high density schemes.</p>	<p>The provisions of NPPF apply to development within the PfE and do not need to be repeated in this plan. It is for the individual boroughs to prepare Design Guides and Codes. Furthermore, in line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. Therefore, no changes are necessary.</p>
15	<p>Design: The policy should ideally be split into two, with a separate policy on good design as a wider strategic matter, taking account of the current NPPF, the National Design Guide and other design guidance in setting an overarching expectation of good design across the plan area that will help drive regeneration. This should refer to the historic environment and the importance of heritage to local character and distinctiveness. This is important in order that the necessary status and direction is given to ensure that good design is properly reflected in local plans.</p>	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1 and JP- P2. The Plan needs to be read as a whole, therefore no change is considered necessary. Local Authorities should prepare Design Codes as required by the National Planning Policy Framework, however, we do not consider there to be merit in repeating the national policy requirement as this is not the appropriate level.</p> <p>Site specific design related issues are addressed in the relevant site allocation topic papers where appropriate.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
16	<p>Historic environment: Concerned that the policy, as with other policies in this chapter fails to recognise that communities of Greater Manchester feel passionately about their built and historic environment and identifying the elements that are special to them can create housing developments which not only achieve their objectives but create places that they are proud of and reinforce local distinctiveness. Therefore the policy will not sustain and enhance its historic environment and the character and distinctiveness of the different places which make up the area and is not consistent with paragraph 190 of the NPPF.</p> <p>Claim that in order to deliver the housing, local distinctiveness is lost because of the reliance of standard house types which do not relate to its existing context and local characteristics such as materials or architectural styles, against the core principles of sustainable development and the conservation and enhancement of the historic environment.</p>	<p>The built and historic environment is recognised through the evidence base supporting Chapter 8 Places for People. Policy JP-P 2 Heritage ensures that particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. Policy JP-P2 requires development proposals, such as housing developments, affecting a designated heritage asset (or an archaeological site of national importance) and a conservation area to conserve those elements which contribute to its significance including those identified in any conservation area appraisal as making a positive contribution to the area. The plan needs to be read as a whole therefore no changes are considered necessary</p>
17	<p>Gypsies and Travellers : The needs for Gypsies and Travellers could be met through strategic allocations, to give more certainty that sufficient sites will be provided. Cheshire West and Cheshire Council question whether leaving the provision of housing for specific groups such as travelling people indicates that the plan is not positively prepared or be sound as it may result in a delay provision of the required sites. Cheshire West and Chester Council (CWaC) would like reassurance that lack of provision for Gypsies and Travellers within the Greater Manchester area in the short-term will not result in increased demand in the CWaC area.</p>	<p>No changes necessary. The Greater Manchester authorities agreed to deal with matters relating to Gypsy and Traveller Accommodation through local planning documents, not a strategic document such as the PfE. Nevertheless, an assessment of Gypsy and Traveller and Travelling Showperson Accommodation has been undertaken to inform district local plan work and is included within the evidence base as Document 06.01.01.</p>

Policy JP-H 4 Density of New Housing

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	Clarity of Density Ranges: Consider there is a need for greater clarity in relation to the density ranges in the final paragraph of the policy relating to scheme where there is a mix of houses and apartments having a desired density of 70-120 dwellings. Policy JP-H 3 confirms that developments across the city should seek to provide a range of dwelling types and on larger greenfield sites, we anticipate local authorities will call for a mix of homes including some apartments, particularly to meet either affordable or elderly accommodation needs as part of a wider family housing mix. We are not convinced such schemes would deliver this density range and is still more likely to be within the 35-70 density range.	No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible.. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas.
2	Density Ranges for housebuilding: The density ranges quoted in the policy are considered to be unrealistic and have the potential to hamper the delivery of a varied mix in the supply of dwellings. The plan or its associated evidence base provides no justification that the proposed densities are deliverable across the city region or demonstrate how housing units in particular could be delivered. The Policy sets a range of 35-70 dwelling per hectare on sites of primarily houses. Experience of delivering homes across Greater Manchester shows very few instances where densities of 70 dwellings have been achieved as primarily homes. The lower end of the range is achievable but when one considers place making, delivery of residential development of predominantly houses, the delivery of significantly more than 35 dwellings per hectare is not realistic or achievable.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. As such, it is considered that sufficient flexibility, to take into account of site-specific constraints, has been incorporated into the policy. It is also considered that a proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] .
3	Concerns with specifying Density: The density of new housing must align with the identified needs at the time an application is being considered as market conditions should drive the mix, not a specific density outlined in policy	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
4	Minimum density: The identification of a minimum net residential density figure of 35 dwellings per hectare for 'all other locations' is unsound. The policy states lower densities may be acceptable where it is required to meet a particular mix or for site specific reasons. The density figure does not allow for the delivery of high quality new residential developments which meet key demands, such as larger family and higher value homes. This figure is notably high and in many cases will be undeliverable whilst also delivering high quality new residential developments which meet other aspects of the draft plan, such as maximising opportunities to enhance existing biodiversity and delivering quality new green infrastructure. Requests wording change from 'may' to 'will be acceptable'.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas however offer sufficient flexibility where a lower density can be justified in line with the criteria. Housing Topic Paper [06.01.03] at page 34.
5	Meeting needs: The PfE provides no evidence that the high-density housing will meet the needs of all households, and certainly not families with children who will require a range of services and community facilities, such as primary schools, which are largely unavailable in the City Centre. The policy risks placing too much emphasis on delivering high density apartments within urban centres, a strategy which could fail dramatically.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas however offer sufficient flexibility where a lower density can be justified in line with the criteria. Housing Topic Paper [06.01.03] at page 34.
6	Apartments: The suggested densities are heavily skewed towards the delivery of apartments in city and town centres. As a result, it does not adequately plan for delivering a mix of different housing types, sizes and densities of development across the Greater Manchester. Greater flexibility should be incorporated into the policy to allow for family housing at existing sustainable communities at densities appropriate to the site and its surroundings and so that the policy can cater for exceptional development. The densities proposed would results in a mix of dwellings which would not meet all identified needs, in particular, provision in family and executive housing, and could lead to a proliferation of higher density apartments and small dwellings. This is clearly in conflict with paragraphs 11, 60, 61 and 62 of the NPPF.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas however offer sufficient flexibility where a lower density can be justified in line with the criteria. Housing Topic Paper [06.01.03] at page 34.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
7	Relationship with JP-H 3's Space Standards: Space standards from are less likely to be achieved within the parameters of the density policy. It is imperative that the other policies in the plan allow for the densities identified to be achieved. e.g. NDSS, M4(2) and M4(3) accessibility standards, integration of SuDs will make dwellings larger and reduce net density.	No changes necessary. It is considered that the requirements of Policy JP-H3 work with Policy JP-H4 toward the aims of the PfE and the Greater Manchester Housing Strategy.
8	Viability: Significant uncertainty over deliverability of some town centre sites, viability assessment finds that only 68% of SHLAA supply is viable.	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (Policy JP-S1). As such, in light of some of the viability challenges identified in low value areas through the Viability Appraisal [03.01.01] of the PfE and subsequent addendum [03.01.02] , and the high proportion of brownfield sites, it was considered appropriate to incorporate a slightly larger flexibility allowance of 15% across the plan area.
9	Space and Design: Policy does not take into account that many families want to live in larger suburban family homes with private outdoor amenity space particularly post Covid with access to schools, play space and other services and facilities. Concerned that the designation of minimum density standards is likely to result in even smaller and less attractive housing and lead to uniformity and lack of choice. Will result in lack of housing for families requiring larger houses with gardens, and new areas will become dominated by younger (and more transient groups), the elderly and poorer families in less spacious and less attractive housing. Higher density development also reduces the opportunities for placemaking and creating communities in which people aspire to live	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 With regard to placemaking, Policy JP-P 1 Sustainable Places considers placemaking and communities. It outlines several key attributes that all development, will be required to be consistent with in order to create one of the most liveable city regions, consisting of a series of beautiful, healthy and varied places. Furthermore, the density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. As such, it is considered that sufficient flexibility, to take into account of site-specific circumstances, has been incorporated into the policy. It is also considered that a proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] .
10	Concerns for economic growth: An over-reliance on high density dwellings (particularly apartments) may increase overall housing numbers, but in practice it will deter families and executives from locating in the area. This in turn will hamper the ability of Manchester to deliver its economic growth objectives and will, at the very best, significantly increase commuting levels and congestion. The PfE therefore lacks an analysis of the type of housing required, and how the growth in smaller families forecast is not always suited to high density apartment living.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. Part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] and details of the housing land supply can be found in the Housing Topic Paper 06.01.03 .

Summary of Main Issues Raised – Chapter 7 – Places for Homes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
11	Town Centre Densities: Concerned that the policy might lead to over or under development in some areas and that ambiguous definitions in Policy JP-H 4 / outdated brownfield registers will make it difficult to determine whether a site satisfies the criteria of the minimum density specification, and if the prescribed minimum density will be delivered. Suggest that table needs to be expanded and accompanied by a map for each LA or clarity be provided regarding the definition of designated town centre boundaries, along with the identification of all the centres they apply to. Others are concerned that whilst there is rigid categorization of centres and straight line distances from boundaries, there is no uniformity in how the districts currently designate centres.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. Part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] and details of the housing land supply can be found in the Housing Topic Paper 06.01.03 .
12	Historic Environment: Impact of density policy on character and heritage has not been considered. As drafted the policy and the Chapter would be very incompatible with IA Objective 16.	No changes necessary. Policy JP-H4 addresses this at point 2 outlining that lower densities may be acceptable where they are justified by site-specific issues, such any potential impact on the wider landscape or townscape including heritage assets. The built and historic environment is recognised through the evidence base supporting Chapter 8 Places for People. Policy JP-P 2 Heritage ensures that particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm.
13	Allocations: Reference within this policy should also refer to densities specific to allocations (e.g. JPA 33 – New Carrington and JPA 27 East of Boothstown) as at present there is conflict between the density figures presented across the plan (i.e. in the allocation policies) which is inconsistent. Others state tat more information is needed about specific definitions of density and how this will be delivered on each site and in each Allocation, claiming that without this evidence it is impossible to determine whether this Policy can be delivered.	The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. No changes necessary. The allocated sites are supported by an appropriate evidence base and where relevant, site specific densities are referred to within the allocation policies. It is not considered that there is conflict between JP-H4 and specific allocation policies
14	Site allocations to meet housing need: More land/specific site is requested to be allocated so that a wide range of family housing can be provided.	No changes necessary. It is considered that Places for Everyone identifies sufficient land to meet Greater Manchester's housing need.

Chapter 8 – Greener

The main issues raised in relation to the policies within PfE 2021 Chapter 8 - Greener and the relevant PfE responses are set out below.

PfE 2021 Policy JP-G1 – Valuing Important Landscapes

Row	Main Issue	PfE Response
1	The policy scope should be broadened to include wider references to areas such as historic designated landscapes; areas of higher/lower value (including those of value to the community); conservation area landscapes; and areas that support important wildlife populations.	Policy JP-P2 is considered to be in accordance with the NPPF and provides an appropriate strategy to conserve and enhance the important landscapes which is a key objective of the NPPF. It is not considered appropriate to amend the policy. Further, these matters are covered by other policies in the Plan including JP-P2 (Heritage) and JP-G9 (Biodiversity). A proportionate evidence base supports the policy including the GMLCSA [07.01.06] which provides a full assessment of landscape areas including identifying where areas are considered to be of high value.
2	Policy provides a very broad-brush Landscape Character Assessment and should be supplemented by more local LCA's (e.g. parish level).	The policy seeks to identify LCT's at a strategic city-region level, assessing Greater Manchester's predominantly unbuilt areas whilst also considering cross-boundary relationships (see paragraphs 8.3 & 8.4 of the Plan). Development will also be required to comply with any landscape policies contained within each local authorities Local Plan which will provide an assessment of landscape at a more local level (where applicable).
3	Landscape character has been ignored in the development of the economic strategy for Greater Manchester. The landscape should be given more weight.	Please see paragraph 8.2 of the Plan. The GMCA is committed to the Government's approach as set out in the 25YEP to deliver a better natural environment for people and wildlife and ensuring that it is accessible for everyone to connect to and benefit from. One of the main objectives of the Plan, Objective 8, relates to improving the quality of our natural environment and access to green spaces, including enhancing special landscapes.
4	Evidence should be provided that shows how each allocation performs when measured against the guidance in the GMLCSA.	The policy requires developments / applicants to consider the GMLCSA [07.01.06] ; All allocations have also been subject to an assessment against various planning constraints, including landscape, as part of the site selection process, as set out in paragraph 6.44 of the Site Selection Background Paper [03.04.01] .
5	Policy is too ambiguous and should explain why these areas have been identified.	The supporting text to the policy (Paragraph 8.3 of the Plan) sets out that the GMLCSA [07.01.06] work / identification of LCT's has been undertaken to assess the quality and sensitivity of different landscapes within the region. As set out in paragraphs 1.7 – 1.12 of the GMLCSA, this is in accordance with national (NPPF) policy in order to set policies against which proposals for any development on or affecting the landscape will be judged; ensuring that development sufficiently

		reflects and responds to any special qualities and sensitivities of the key landscape characteristics of its location (see paragraph 1 of policy).
6	Development should conserve and enhance the special qualities of landscapes and not just reflect and respond to them (this approach would follow the wording used in the statute for National Parks and AONBs).	The conservation and enhancement of certain protected landscapes such as the historic environment, heritage assets and their landscape settings is covered by policy JP-P2 (Heritage). The guidance and opportunities for future development and landscape management / enhancement in the GMLCSA [07.01.06] additionally identified where features of the identified landscapes should be conserved and enhanced. Additional reference within the policy text is not therefore considered necessary.
7	The value of landscape character assessment is not applied appropriately within the policy. Stopping at the urban edge fails to recognise that urban development, particularly more recent development which tends to be peripheral to the urban area, overlays the historic landscape.	<p>The GMLCSA [07.01.06] sets out in full the value of the identified LCT's as shown in Figure 8.1 of the Plan. The study area is considered appropriate for a regional-scale landscape character assessment and the methodology for the definition of the study area (comprising areas included in the GM Green Belt Assessment [07.01.04] and other areas of open land included in previous district-scale landscape character assessments) is included at paragraph 3.3 of the GMLCSA.</p> <p>Policy JP-P2 (Heritage) covers the regions approach to the protection of the historic environment / landscape both within and outwith the urban area, including the requirement for new development to positively conserve, sustain and enhance historic environments and their settings. As set out in Policy JP-P3, Local Plans will be responsible for setting out key heritage considerations and will demonstrate a clear understanding of, inter alia, the heritage value of sites.</p>

PfE 2021 Policy JP-G2 – Green Infrastructure Network

Row	Main Issue	PfE Response
1	Hedgerows and trees are green infrastructure should be added to the policy.	The Green and Blue Infrastructure Study that is summarised in the Natural Environment Topic Paper [07.01.26] explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected.
2	Green Infrastructure is cross boundary in nature and requires commitment from partners to work together to protect and manage it.	PfE Statement of Common Ground 6 (p44) [01.01.02] refers to green infrastructure.
3	The evidence to support the policy should identify why the Opportunity Areas have been chosen.	The Green and Blue Infrastructure Study that is summarised in the Natural Environment Topic Paper [07.01.26] explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected.
4	Development of sites can unlock access to the wider green infrastructure network.	It is considered that this comment is adequately covered by last two paragraphs of Policy JP-G2.
5	The Policy should specify how development should improve the Green Infrastructure network.	Paragraph 12.3 of the supporting text to the PfE outlines the delivery mechanisms that are available to implement the plan policies. Paragraph 1.57 of the PfE indicates that all policies in

		the plan are strategic policies and that district Local Plan can set out more detailed policies reflecting local circumstances.
6	Historic landscapes, parks and gardens should form part of the Green Infrastructure network.	These form the urban greenspace element of the Green Infrastructure Network and as such are covered by Policy JP-G6 Urban Green and its supporting text.
7	The clarity of the maps at Figures 8.2 and 8.3 of the PfE which show the extent of the Green Infrastructure Network and the Opportunity Areas could be improved.	Whilst it is considered that the clarity of Figures 8.2 and 8.3 could be improved, it is not considered to be a soundness issue, therefore no change is proposed.
8	The policy should protect Green Infrastructure more vigorously.	It is considered that the approach to protect, manage and enhance green infrastructure is consistent with Paragraph 175 of the NPPF which states that 'Plans should...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

PfE 2021 Policy JP-G3 – River Valleys and Waterways

Row	Main Issue	PfE Response
1	Concerns about safety around water.	Part 8 of PfE Policy JP-P1 Sustainable Places refers to designing places to be safe. Therefore, issues relating to water safety are covered by that policy.
2	The right of public access to waterways for recreation should be increased.	Public rights to use waterways for recreation purposes is a legal matter around land and riparian ownership and is outside the scope of the PfE.
3	The full extent of river catchments that cross the GM boundary, starting in the Uplands, should be considered to prevent flooding.	Paragraph 8.22 of the support text to Policy JP-G3 notes that there is a complex network of river catchments that extend beyond GM. The collaborative approach to the development of the evidence base, understanding cross boundary issues and policy development for the PfE Greener Places chapter policies is acknowledged in the PfE Statement of Common Ground 6 (p44) [01.01.02] .
4	Concerns that building close to rivers and waterways could have a negative impact on natural character, green infrastructure and access.	Part 9 of Policy JP-G3 seeks to ensure that developments relate positively to waterways and taking advantage of opportunities to integrate green infrastructure.
5	Canals are engineered structures and sometimes have different detailed issues to natural rivers, which should be more explicit in the policy.	The policy principles apply to both canals and rivers and it would be too detailed for this strategic policy to go into further detail. More detail could be provided in district Local Plans.
6	The KPIs need to be updated to ensure they measure all aspects of this policy.	It is considered that the KPIs/targets on page 393 in the Monitoring chapter of the PfE sufficiently cover river valleys and waterways as a component of the Green Infrastructure network

7	Concerns that building in river valleys and adjacent to waterways will increase flood risk.	A proportionate evidence base has been provided to assess the impact on flood risk in the Level 1 and Level 2 SFRA's and the Flood Risk Sequential and Exceptions Test Evidence Paper [04.02.01 – 04.02.19] . Paragraph 159 of the NPPF requires development to be made safe from flood risk and not increase flood risk elsewhere.
8	Concerns about water pollution in rivers.	Part 6 of Policy JP-G3 seeks to improve water quality.
9	Concerns about how new infrastructure will be paid for.	PfE Policy JP-D1 Infrastructure, outlines how infrastructure will be implemented to deliver the PfE. Paragraph 12.3 of the supporting text to Policy JP-D1 outlines some of the funding mechanisms available.

PfE 2021 Policy JP-G4 – Lowland Wetlands and Mosslands

Row	Main Issue	PfE Response
1	A plan clearly delineating the lowland wetlands and mosslands should be included to identify the area to which the policy applies.	More detail regarding Wetlands and Lowlands is included in the Landscape Character and Sensitivity study [07.01.06] .
2	Evidence should be provided showing the ecological value of allocations in areas of undeveloped mossland. If information is not available the allocation should be withdrawn.	All site allocations have undergone the site selection process. It is considered that the site selection process is a transparent and appropriate process and is explained in the Site Selection Background Paper [03.04.01 – 03.04.11] .
3	Policy should set out how high value peaty soil resources will be conserved and managed in a sustainable way.	Policy JP-G9 provides for the safeguarding, restoration and sustainable management of our most valuable soil resources to ensure the protection of peat-based soils. The policy is in line with the National Planning Policy Framework (NPPF).
4	Ensure organisations are consulted with for advice.	Statutory consultees are consulted throughout the process of plan making to ensure plans meet the test of soundness.
5	Concerns regarding the inclusion of mossland areas in the list of allocations. These should be re-located and sites restored. Trees and hedgerows are not always suitable to introduce into open lowland wetlands and mosslands.	No change is considered necessary. PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. The Plan should be read as a whole, therefore this approach is considered consistent with NPPF.
6	Development of lowland, wetlands and mosslands contradicts policy on carbon management.	Paragraphs 8.28 of the supporting text to Policy JP-G4 outlines that several restoration projects are underway within the Plan area, which will not only have major nature conservation benefits, but could also make a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon. The requirements of Policy JP-G4 should be read in conjunction with the policies in the PfE that deal with climate change.

7	Lowland, wetlands and mosslands should not be included within site allocations.	Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Some sections of undeveloped mossland, however, are considered appropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth.
8	Evidence base should be prepared by non-partisan, non-biased professionals to fully assess the impact on local/national flora and fauna.	It is considered that Policy JP-G4 is supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .
9	Amendments and changes to the Lowland Wetlands and Mosslands policy wording.	Whilst the alternative suggestion is noted, the way the current policy has been worded it is currently considered sound, therefore no change is deemed necessary where the proposed amendments have been concerned. Other comments which were not relevant to the content of the Lowlands, Wetlands and Mosslands chapter and in response to the consultation process have been addressed elsewhere in the summary process.

PfE 2021 Policy JP-G5 – Uplands

Row	Main Issue	PfE Response
1	Concerns regarding Green Belt release in the uplands.	As referenced in paragraph 8.35 no land is proposed to be removed from the Green Belt for development within the uplands. No change is considered necessary.
2	Support and protect nature in the uplands.	Policy JP-G 9 seeks to enhance net biodiversity over the plan as a whole.
3	Due care and attention should be paid to heritage assets that may be affected in the upland areas.	Policy JP-P 2 seeks to ensure objectives to preserve heritage assets are met. In particular criteria 4 seeks to deliver positive benefits that sustain and enhance the historic environment.
4	Disagreement that the Places for Everyone IA that JP-G5 a positive effect on IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .
5	Amendments and changes to the policy have been proposed in regards to the uplands policy.	Whilst the alternative suggestion is noted, the way the current policy has been worded it is currently considered sound, therefore no change is deemed necessary where the proposed amendments have been concerned. Other comments which were not relevant to the content of the uplands chapter and in response to the consultation process have been addressed elsewhere in the summary process.

PfE 2021 Policy JP-G6 – Urban Green Space

Row	Main Issue	PfE Response
1	Green spaces should be enhanced through the development process and should be favourable to wildlife.	As noted in paragraph 8.1 the GMCA is committed to the Government's approach as set out in the 25 Year Environment Plan to deliver a better natural environment for people and wildlife and ensuring that it is accessible for everyone. Paragraph 8.6 to 8.15 refers specifically to the Green Infrastructure Network, in particular point 8.12 refers to Local Nature Recovery Strategies which will assist in supporting local wildlife. In addition Policy JP-S 4 Resilience criteria 7 refers to enabling the city region, its citizens and wildlife to adapt to changing conditions.
2	Green spaces will be destroyed by these proposals.	Policy JP-G 6 specifically seeks to protect and enhance existing urban green space to support a high quality of life in urban areas.
3	Green spaces should be retained to help to mitigate the effects of Climate change.	Criterion 8.39 of the Greener Places chapter, states the significant importance of urban green space in managing the effects of climate change. Responding to the impact of climate change is a key theme within the plan as pointed out in the Sustainable and Resilient Places chapter criteria 5.5 to 5.7. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report [02.01.01] states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
4	Amendments and changes to the policy wording in regards to the environment.	<p>Whilst the alternative suggestion is noted, the way the current policy has been worded it is currently considered sound, therefore no change is deemed necessary where the proposed amendments have been concerned.</p> <p>Other comments which were not relevant to the content of the uplands chapter and in response to the consultation process have been addressed elsewhere in the summary process.</p>
5	Promote walking and footpaths/rights of way to enable more people to walk and enjoy the benefits of walking.	Policy JP-Strat 13 Strategic Green Infrastructure criterion 4.83 details the strategic aims of the plan to improve cycling and walking routes within the urban area. Policy JP-P1 Sustainable Places criterion 13 seeks to provide accessible routes for those of all mobility levels, particularly by walking and cycling. Including enjoyable routes free from obstacles and including rest places.

PfE 2021 Policy JP-G7 – Trees and Woodland

Row	Main Issue	PfE Response
1	Tree planting should be a priority. Replacing lost trees should be a priority.	It is not practical to identify, even at a strategic level, locations where tree planting would be required. This is a matter more appropriately dealt with at the local level having regard to relevant PfE and Local Plan policies. Criterion 12 of the policy states that where development would result in the loss of existing trees, replacement on the basis of two new trees for each tree lost would be required on site if possible.
2	Support the Greater Manchester Trees and Woodland Strategy as it is in line with campaign objectives	As stated in the policy, the aim is to support delivery of the Greater Manchester Tree and Woodland Strategy.
3	Wildlife is being affected by development and loss of habitat	A number of the policies in the Greener Places chapter address the issue of the protection of wildlife and habitats where development is proposed such as JP-G9
4	Protection of Ancient and Semi-Natural Woodland needs to be stronger	NPPF provides strong protection for Ancient and Semi-Natural Woodland. There is no need to replicate NPPF text in PfE policy.
5	New woodland needs greater protection	Policy JP-G7 covers all types of woodland and criterion 1 of the policy seeks to protect all woodland habitats.
6	The requirement to replace trees is not justified.	The planting of a tree for every resident is set out in the policy as a City of Trees initiative over the next 25 years and is not a development management requirement.
7	PfE should be modified by the addition of a diagram which identifies an indicative location for the new City Forest Park.	The plan does not designate the park. More information on this strategic initiative can be found at the City of Trees here .
8	Improve access to woodland and trees, particularly within urban areas. Improve health and wellbeing.	Criterion 1 of policy JP-C7 states the need to ensure that new developments are planned and constructed with walking and cycling as the primary means of local access, and fully integrated into the existing walking and cycling infrastructure. Criterion 10 of policy JP-G7 refers to improving public access particularly by sustainable travel models.
9	Amendments and changes to the policy which have been proposed in regards to hedgerows, trees and the benefits of natural regeneration.	Whilst the alternative suggestion is noted, the way the current policy has been worded it is currently considered sound, therefore no change is deemed necessary where the proposed amendments have been concerned. Other comments which were not relevant to the content of the uplands chapter and in response to the consultation process have been addressed elsewhere in the summary process.

PfE 2021 Policy JP-G8 – Standards for Greener Places

Row	Main Issue	PfE Response
1	Destroying Green Belt is not valuing important landscapes. Do not destroy Green Belt to create greener spaces. This is counter to national policy.	The National Planning Policy Framework sets out a strategic policy requirement for ensuring sufficient provision for conservation and enhancement of green infrastructure. Paragraph 174.a of the National Planning Policy Framework seeks to ensure that the natural environment is protected. Within the Plan this also includes reference to Policy JP-G 1 Valuing Important Landscapes. There is also a strategic case for the release of Green Belt as set out in the Green Belt Topic Paper [07.01.25] .
2	More emphasis is needed to protect nature and green spaces. Access should remain open to green spaces.	Paragraph 8.10 of Our Green Infrastructure Network emphasises the importance to valued landscapes and protected sites particularly for their social and economic benefits. As set out in Policy JP-G8, it is the intention of the 9 districts to develop standards to maximise the number of residents who have access to natural green space.
3	The Greater Manchester “Green Factor” sounds like it will set a realistic baseline for minimum green space provision, however there is a lack of detail. It would have been better to comment on the detail sooner than at more formative stages of the Plan.	The supporting paper ‘Guidance for Greater Manchester - Embedding Green Infrastructure principles’ states the Greater Manchester ‘Green Factor’ is expected to be similar to the London one, however it is likely that recommended scores will differ for rural and urban areas given the nature of the city region. This will be clarified further as the Plan progresses.
4	The Plan does not mention historic designed landscapes, grouping parks with river valleys or as general heritage.	Planned greenspaces such as parks and gardens and those with a historic element to them form part of the urban greenspace element of the Green Infrastructure Network and as such are covered by Policy JP-G6 Urban Green and its supporting text, particularly Paragraph 8.40.
5	Although greater access is mentioned elsewhere in the document, a completely inadequate mention of maintaining the existing rights of way.	Policy JP-P 7 Sport and Recreation criterion 6 seeks to protect and enhance the public rights of way network.
6	Amendments and changes to the policy have been proposed in regards to the Standards for Greener Places policy.	<p>Whilst the alternative suggestion is noted, the way the current policy has been worded it is currently considered sound, therefore no change is deemed necessary where the proposed amendments have been concerned.</p> <p>Other comments which were not relevant to the content of the Standards for Greener Places chapter and in response to the consultation process have been addressed elsewhere in the summary process.</p>

PfE 2021 Policy JP-G9 – A Net Enhancement of Biodiversity and Geodiversity

Row	Main Issue	PfE Response
1	The Policy is lacking in detail on how biodiversity will be measured / lack of support for the use of the DEFRA metric (2012) for calculating net gains – it is still too vague and reliant on lots of elements working together.	Policy JP-G9 provides a high level strategic policy. Detailed matters will be a consideration at a local level through the planning application determination process or Local Plan policies. The use of the metric is in line with industry and national standards in relation to the calculation of biodiversity net gain. As set out in paragraph 8.52 of the Plan, recognised metrics will be applied to new development proposals and these may be updated over time.
2	Make specific reference to ancient woodland, hedgerows, TPO's water courses, ponds, wetlands, heather mosses, peat bodies, priority species under NERC Act, birds, Red Data list.	It is considered that the greener chapter as a whole, particularly JP-G7 (trees and woodland) provide an adequate policy framework for the protection of these features. Policy JP-G9 is a high-level strategic policy relating to Biodiversity Net Gain and so no changes are proposed.
3	Wording should be added to make the policy subject to a viability review to ensure it does not undermine the delivery of the plan.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity which is a key objective of the Plan and NPPF. Chapter 12 of the PfE outlines how the Plan, including Policy JP-G9, will be delivered. In particular, paragraph 12.3 of the supporting text outlines the delivery mechanisms that are available to implement the plan policies and paragraphs 12.16 to 12.20 outlines the funding mechanisms.
4	The Policy proposes to denigrate these essential environments, despite their prioritisation in the Government's 25 year environment plan and the recently published England Peat Action Plan	We disagree with this suggestion. Policy JP-G9 provides for the safeguarding, restoration and sustainable management of our most valuable soil resources to ensure the protection of peat-based soils and safeguards against the loss of wildlife habitats. Paragraph 8.48 of the supporting text outlines that a key priority of the Plan is to achieve a major net enhancement of biodiversity value and improve access to nature.

PfE 2021 Policy JP-G10 – The Green Belt

Row	Main Issue	PfE Response
1	The policy should recognise that in accordance with national planning policy, certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include mineral extraction.	No change is considered necessary. Policy JP-G10 is considered to be consistent with NPPF and provides an appropriate green belt strategy. National planning policy in relation to green belt still applies and does not need to be repeated here

2	Green belt release is based on an insufficient scale of development and site selection process should be more transparent - exceptional circumstances exist for more green belt to be released in order to fully meet objectively assessed needs.	As set out in the Green belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt [07.01.25] as well as the 2016 GM Green Belt Assessment [07.01.04] and 2020 GM Green Belt Study [07.01.07 – 07.01.24], the scale of development proposed appropriately meets the Local Housing Need and Objectively Assessed Need for Employment. A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning the Green Belt boundary will endure beyond the plan period. This is supported by a proportionate evidence base and no changes are considered necessary.
3	The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.	Paragraphs 78 – 80 and paragraph's 84 & 85 of the NPPF deal with the national policy approach to rural housing and supporting the rural economy. Whilst these issues may be guided by policy in individual Local Plans, it is not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. The current greener chapter policies are considered sound, therefore no changes or further policies are considered necessary.
4	The PFE should clarify whether any further non-strategic changes to Green Belt boundaries will take place through emerging Local Plans.	It not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'.
5	The fixation with the commitment to "no net Green Belt loss" is wrong and misguided / superfluous. It reduces flexibility, by imposing greater policy tests to be overcome should this land be required for development in the future.	Given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or green Belt land. Steps have been taken to minimise net loss of Green Belt in the plan. The Green Belt Topic Paper [07.01.25] sets out the local level case for exceptional circumstances and links to evidence that demonstrates, proportionately, that the amount of sites proposed for allocation is suitable.
6	This policy is superfluous as it adds nothing more to national policy. The policy repeats what is in national policy and guidance. We recommend that it is deleted. The diagram showing the extent of the green belt is needed and the supporting text should be retained.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.
7	The wording of the policy is unclear - once sites are allocated for development they are removed from the Green Belt and therefore policy tests relating to the Green Belt no longer apply.	The current policy wording is considered sound and clear; planning applications coming forward on the proposed site allocations must be comply with relevant allocation policies otherwise they would not accord with policy and represent a departure from a plan; green belt will still cover over 45% of the land area covered by the plan and green belt policies will still apply to protect these sites from inappropriate development. No changes are considered necessary.

PfE 2021 Policy JP-G11 – Safeguarded Land

Row	Main Issue	PfE Response
1	The identification of a number of smaller sites as safeguarded land in each authority would offer the potential to quickly address shortfalls in the supply of units through a Local Plan Review. An insufficient amount of safeguarded land has been identified. Concerns that allocations may not be delivered in full.	A 16% margin of flexibility has been identified in the housing land supply see Housing Topic Paper [06.01.03] . Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the identified housing needs, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that Policy xxx provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF.
2	This policy should make it clear that the districts can safeguard land through their Local Plans to address longer term needs.	National policy indicates at paragraph 143 of the NPPF that, where necessary, local authorities should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period. Notwithstanding this, it is not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities to set out more detailed policies for specific areas, neighbourhoods or types of development.
3	No figures have been provided which confirm: the expected housing delivery rates of the PFE allocations; the level of housing delivery expected beyond the plan period; or how future development needs beyond the plan period will be met. The other sources of supply listed are not safeguarded land, they are a mix of existing Green Belt allocations and urban sites.	As set out in the Housing Topic Paper [06.01.03] the Plan includes stepped targets over the plan period and has identified potential supply both within the plan period and post-2037, as well as delivery trajectories and providing information along with the SHMA [06.01.02] on past delivery rates. The work of each of the local planning authorities in terms of housing delivery will be key to ensuring that these stepped changes in delivery rates are achieved, and these will be reviewed regularly as part of the Housing Delivery Test process. An appropriate buffer has been applied to the land supply to meet future development needs beyond the plan period through a mix of allocations with capacity beyond the plan period and safeguarded land.
4	Policy JP-G 11 should include a trigger linking to allocation policies that state safeguarded land will only come forward following the delivery of HS2.	Whilst it is considered linking the policy to Policy JP Allocation 3.2 and reference contained therein to safeguarded land only coming forward following the delivery of a HS2 Airport Station, this is not considered to be a soundness issue, therefore no change is proposed.
5	Provide a map to the safeguarded land.	Land identified as safeguarded land is identified on the allocation map for Policy JP Allocation 3.2 (Timperley Wedge).

Chapter 9 – Places for People

The main issues raised in relation to the policies within PfE 2021 Chapter 9 – Places for People and the relevant respondents to PfE 2021 is set out below.

Policy JP-P 1 Sustainable Places

Row	Main Issue	PfE Response
1	Detailed infrastructure plans are required to support the plan.	The GMCA has prepared an Infrastructure Framework 2040 to support the delivery of the Greater Manchester Infrastructure Strategy and PfE 2021. Detail of allocation specific infrastructure necessary can be found in relevant allocation policies and topic papers: PfE Supporting Documents . Additionally, masterplans, where required, will provide further detail as schemes develop. Therefore no change is considered necessary.
2	A sustainable places policy within a Plan that proposes the release of large amounts of Green Belt and open land is flawed.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] .
3	Some areas are already at a saturation point for satisfactory living for the present residents. No more can be accommodated in such areas, without severe deterioration in the environment and quality of life for the present residents and local wildlife. Flooding as a result of climate change is exacerbated with the loss of greenspaces and infrastructure (schools, doctors, roads) is over stretched.	n Integrated Assessment has been carried out, incorporating elements of an Strategic Environmental Assessment which promotes sustainable development, health and equality issues and ensures that they are considered as the plan has been prepared. PfE is also considered to be supported by a proportionate and appropriate evidence base, including a strategic flood risk assessment [04.02.01] , habitat regulation assessments, transport locality assessments and specific allocation topic papers in the PfE Supporting Documents . It is considered that the Plan as a whole provides an appropriate policy framework to provide necessary mitigation for proposals in these matters, such as set out in Policies JP-S1, JP-S5, JP-S6, JP-P5, JP-P6 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.
4	The plan needs to allow for the release of additional Green Belt land and the subsequent creation of high-quality neighbourhoods of choice, each of which have a strong sense of place and are areas in which people aspire to live within.	Objective 2 and para 9.7 of the Plan sets out an ambition that all parts of Greater Manchester will be neighbourhoods of choice, with good quality affordable homes in safe, attractive communities. This ambition will be delivered through a range of policies within the Plan, not just housing and Green Belt policies, and

Summary of Main Issues Raised – Chapter 9 – Places for People

Row	Main Issue	PfE Response
		through a range of site allocations across the nine Districts. Sufficient Green Belt land is proposed to be released to meet identified development needs. Therefore no changes are considered necessary.
5	Mental health resilience is not represented here and in particular Green Infrastructure makes an important contribution to mental wellbeing and therefore should be an integral part of any new development.	Paragraph 1.40 of the Plan recognises the important role of Green Infrastructure in promoting physical and mental health. Policies within the plan also support the approach promoted in the Government's 25 Year Environment Plan (Chapter 3) which aims to help people improve their health and wellbeing by using green spaces. Clauses 9 and 16 of JP-P1 recognise the importance of Green Infrastructure and green spaces in new development; Policy JP- P6 Health seeks to maximise the positive contribution to health and well-being (of new development) and JP-P7 Sport and Recreation and the Greener Places chapter provide additional policy direction. Further details are set out in the Natural Environment Topic Paper [07.01.26] . The Plan should be read as a whole, therefore no changes are considered necessary.

Policy JP-P 2 Heritage

Row	Main Issues	PfE Response
1	<p>Heritage impact assessments should be prepared for each of the proposed allocations, to consider potential impacts upon the significance of heritage assets and their setting, the appropriate type/quantum of development, its public benefit, and how any harm could be mitigated.</p> <p>Without this, it cannot be demonstrated that the objectively assessed development needs of the plan area will be met in accordance with the presumption in favour of sustainable development.</p>	<p>A screening of all the allocations was carried out in the strategic historic environment assessment [08.01.01] and, where necessary, individual site specific historic environment assessments. Following these assessments, the relevant allocations in the plan include reference to the need to conserve and enhance heritage assets and their setting and for up-to-date Heritage Impact Assessment(s) to be required at the planning application stage. Additionally all the policies in the plan, including Policy JP-S1 Sustainable Development and the site allocations, have been independently assessed through the Integrated Assessment [02.01.02] which promotes sustainable development. Therefore, no change is considered necessary.</p>
2	<p>Heritage, locally, is about access to green spaces and waterways for exercise, more development reduces that leisure provision.</p>	<p>PfE is a joint strategic development plan document which promotes a sustainable pattern of development for the nine districts and should be read as a whole. Policy JP-P2 specifically addresses heritage and the historic environment rather than the natural environment. The Greener Places chapter sets out support for the important role of our natural assets by valuing the special qualities and key sensitivities of our landscapes; seeking to protect and enhance green and blue infrastructure; and seeking an overall enhancement of biodiversity and geodiversity.</p> <p>This is endorsed in the Places for People chapter through JP-P1; JP-P6 and JP-P7; and also, Policies JP-G3 and JP-C5. Additionally, the allocation policies make appropriate provision for open space and active travel.</p>
3	<p>Consideration should be given to the countryside in addition to those stated.</p>	<p>PfE is a joint strategic development plan document which promotes a sustainable pattern of development for the nine districts and should be read as a whole. This policy is consistent with the NPPF and sets out a positive strategy to address heritage in both urban and rural settings. Further detail is set out in the Heritage Topic Paper [08.01.12]. An appropriate policy framework is provided for environmental assets elsewhere in the Plan, particularly within the Greener Places chapter. Therefore no change is considered necessary.</p>
4	<p>Heritage assets 'at risk' - new development, rather than being a threat to heritage, can assist in the regeneration through enabling development, and this is true for both brownfield and greenfield sites.</p>	<p>Policy JP-P2 is considered to be in accordance with NPPF paragraph 208 and Historic England advice in that it provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. Enabling development is a development management mechanism, which is only applicable in certain circumstances to secure the future conservation of a heritage asset, in situations where the proposed development would otherwise conflict with adopted planning policy. It will be for the relevant local planning authority to assess the benefits of a proposal for enabling development in line with NPPF paragraph 208 as part of the decision making process. Therefore no change is considered necessary.</p>

Summary of Main Issues Raised – Chapter 9 – Places for People

Policy JP-P 3 Cultural Facilities

Row	Main Issues	PfE Response
1	Theatres, cultural buildings, public houses and other community facilities can play a key role in helping to shape and support town centres, other centres and communities.	The purpose of such buildings is recognised in Policy JP-P3, paragraph 9.15 and The Greater Manchester Cultural Strategy. No change is considered necessary.
2	Our rural culture should also be protected and enhanced in the future and this is an omission from the policy and needs inclusion.	<p>Policy JP-P3 is considered to provide an appropriate strategy for developing and supporting our cultural businesses and attractions at a strategic level. It is in accordance with NPPF Paragraph 84d which states that planning policies should enable ‘The retention and development of accessible local services and community facilities, such as cultural buildings....’ to support a prosperous rural economy. It is, therefore, not considered necessary to duplicate NPPF policy.</p> <p>The specific reference to ‘our cities and towns’ in Policy JP-P3 reflects that the majority of GM’s cultural assets are located within urban areas, though this does cover assets within our more rural towns.</p>
3	A blanket approach to protecting all community venues, facilities and uses is not justified or supported by the evidence base. The policy needs to make allowance for changes of use when the existing community use is no longer needed or viable.	Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions at the strategic level. As set out in paragraph 9.15, the enhancement of cultural facilities is central to place-making. Therefore, in the first instance, it is important to explore ways to proactively develop and protect such uses.
4	This is more of a wish list than a policy for culture. What is actually proposed and how will it be delivered?	Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions at a strategic level having been informed by the Greater Manchester Strategy for Culture and the Culture Recovery Plan 2021/22 . Cultural facilities, including community venues, facilities and uses can be central to place-making as set out in paragraph 9.15. Therefore, it is important to explore ways to proactively develop and support such uses which is what this policy seeks to do through a range of measures which will be implemented/ delivered through the development management process at the local level.
5	Further clarity is required as to what the Creative Improvement Districts designations comprise.	Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed. Further information in relation to Creative Improvement Districts (CIDs) can be found in the GM Culture Recovery Plan . They form part of GM’s cultural response to the pandemic.

Policy JP-P 4 New Retail and Leisure Uses in Town Centres

Row	Main Issues	PfE Response
1	Brexit and Covid impact requires the baseline to be reset to 2022 and a rewrite of this policy.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
2	Consider developing smaller town centres to avoid people visiting larger towns, shop locally and reduce travelling.	Policy JP-P 4 identifies the upper levels of the hierarchy of centres for retail and leisure in town centres. It is clear that the boundaries and detail of other centres at lower levels of the hierarchy are defined in district local plans, see PfE paragraph 9.21. The need for expansion of any existing centres, or the provision of new centres, will be defined in district local plans. This is consistent with NPPF paragraph 58, therefore no change is considered necessary.
3	Remove the "hierarchy of centres" concept, which is a dated view of retail and leisure uses in town centres. Some are better than others.	Policy JP-P 4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area; which alongside JP-Strat-12 on Main Town Centres provides a sufficient policy framework to address this matter. Evidence can be found in Employment Topic Paper [05.01.04] pages 6, 8, 10 and 12; it is considered to be consistent with national policy, NPPF (paragraph 86 (a)), therefore no change is proposed.
4	Support the proposed hierarchy of centres but there should be greater protection provided to assure their continued vitality and viability given the challenges they face due to changing consumer behaviour.	Policy JP-P4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area. This is supported in the Employment Topic Paper [05.01.04] pages 6, 8, 10 and 12. The boundary of the centres and the detail of the other centres will be provided in district local plan, as will specific proposals to ensure their vitality and viability. The approach to the hierarchy of centres presented in this policy is considered to be consistent with NPPF (paragraph 86 (a)). Additionally Policy JP-Strat12 addresses issues around challenges to vitality and viability.
5	It is not justified to specify that other tiers of the hierarchy will be maintained. The hierarchy below tiers A & B should be reviewed through the District Local Plans.	Policy JP-P4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area. There is no evidence to suggest that the current broad hierarchy of centres is no longer appropriate. Therefore, in order to be clear about the wider hierarchy and the relationship with district local plans, the PfE plan makes it clear that centres in the lower levels of the hierarchy are defined in district local plans, see PfE paragraph 9.21. The policies in these local plans will be subject to the normal process of local plan review. This approach is considered to be consistent with national policy, NPPF (paragraph 86), therefore no change is proposed.
6	Identify The Quays as including a main town centre.	Consideration of Salford Quays as a new town centre will be addressed, in the first instance, through the Salford Local Plan. Policy JP-P4 makes it clear that should its designation as a town centre be confirmed in the Salford Local Plan then it would be classed as a Main Town Centre for the purposes of the policy. The Salford Local Plan, which was examined in late 2021, has yet to be adopted, therefore no change is proposed.

Policy JP-P 5 Education, Skills and Knowledge

Row	Main Issues	PfE Response
1	Ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.	Criterion 2 of Policy JP-P5 highlights the need to work with education providers to forecast likely changes in demand for school places, and where appropriate, requiring housing developments to make a sufficient financial contribution and/or set aside land for a new school, proportionate to the additional demand they would generate. Notwithstanding this, the allocation policies in the PfE, set out the specific infrastructure requirements for that development, including education where relevant. Details are available in the relevant allocation topic papers. Therefore, no change is considered necessary.
2	Ensuring there is an adequate supply of sites for schools is essential and will ensure that the local authorities within the Greater Manchester area can swiftly and flexibly respond to the existing and future need for school places over the plan period.	Local authorities have a statutory duty to secure sufficient school places within their areas. To ensure the delivery of sufficient school places to respond to the demands from new housing, criterion 2 of Policy JP-P5 supports this approach by highlighting the need to work with education providers to forecast likely changes in demand for school places. Where appropriate, housing developments will be required to make a sufficient financial contribution and/or set aside land for a new school, proportionate to the additional demand they would generate. Notwithstanding this, the site allocation policies in the PfE, set out the specific infrastructure requirements for that development, including education where relevant. Details are available in the relevant allocation topic papers. Therefore, no change is considered necessary.
3	Whilst facilities, knowledge and universities are rightly areas of focus, there is little emphasis on the importance of the development of skills that are essential for the workplace and key to greater social mobility, i.e., high quality, well supported work-based learning needs.	Criterion 1 of Policy JP-P5 refers to adult training, which could include work-based learning. Additionally, criterion F of Policy JP-J1 seeks agreement with employers and developers, including housebuilders, to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate. Therefore, no change is considered necessary.
4	Ensure new places of education have plenty of green spaces for children.	All new schools or expansion of existing facilities will be in accordance with DfE guidelines which will be a matter for consideration at planning application stage. Additionally, criterion 7 of Policy JP-P7 encourages the incorporation of sports facilities in all education settings. Therefore, no change is considered necessary.
5	Change the wording of criterion 2 b. to read: Where appropriate, requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate <u>above existing capacity</u> .	The proposed modification is not considered necessary. Policy JP-P5 is considered to be consistent with national planning policy, specifically NPPF paragraph 95. Together with the supporting text and the policies in Chapter 12 of the Plan, it is considered that this policy provides a clear policy framework. Therefore, no change is considered necessary.
6	Part (2b) should be amended so that it states (additional wording is underlined):	The proposed modification is not considered necessary. A two stage Strategic Viability Assessment [03.01.02] and [03.03.04] has been published alongside the PfE Plan. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE plan will be viable, however NPPF paragraph 58

Summary of Main Issues Raised – Chapter 9 – Places for People

Row	Main Issues	PfE Response
	Where appropriate, <u>and subject to the site's viability</u> , requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate.	provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore, no change is considered necessary.

Policy JP-P 6 Health

Row	Main Issues	PfE Response
1	In areas of significant housing growth funding must be leveraged through developer contributions to support the demand for health and care services.	JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for the provision of health facilities. Additionally, Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health facilities, further details of which can be found in the relevant allocation topic papers. The plan needs to be read as a whole, therefore no change is considered necessary.
2	Site promoters and developers must be encouraged to consider the health impacts of their proposed developments from the outset. Whilst the Policy JP-P6 includes strategic health policy, it should also stipulate that there should be increased access to developer contributions for health within the Places for Everyone Plan.	No change is considered necessary. JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health provision, further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF, as the Plan should be read as a whole.
3	Open spaces are needed for our physical and mental health and our wellbeing.	Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the provision of health facilities. The Greener Places chapter and Policy JP-P1 provide an appropriate strategic policy framework in relation to provision of open spaces for physical and mental health. The plan should be read as a whole, therefore no change is considered necessary.
4	The policy fails to tackle some of the key contributory factors contributing to physical inactivity, obesity and ill-health, such as excessive car usage.	Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. Policies elsewhere in the Plan, including policy JP-P7 and those within the Greener Places and Connected Places chapters promote physical activity and reduced car dependency. The Plan should be read as a whole, therefore no change is considered necessary.
5	The policy should identify which sites and/or types of development may require a HIA, who will be consulted, and what should be considered in determining whether HIA is needed. .	Criterion C requires new development proposals to be supported by a Health Impact Assessment (HIA) where an Environmental Impact Assessment is required, as well as other proposals where the local planning authority considers it appropriate (due to their nature or proximity to sensitive receptors). Further clarification is given in paragraph 9.33. No changes are therefore considered necessary.

Policy JP-P 7 Sport and Recreation

Row	Main Issues	PfE Response
1	The plan should allow new development to enhance existing sport and recreation provision (in quality and quantity terms) both on and off site.	No change is considered necessary. Policy JP-P 7 criterion 4 provides an appropriate policy framework to achieve this.
2	Families and children need local parks and open spaces if they are to lead healthy lives.	Noted, no change is considered necessary. JP-P7 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for provision of sport and recreation. Policies elsewhere in the Plan, especially those within Greener Places provide protection in relation to green infrastructure such as parks and other open spaces, with further details set out in the Natural Environment Topic Paper [07.01.26] . The Plan should be read as a whole.
3	Retain green spaces which allow outdoor activities such as walking, running, dog walking, cycling and horse riding for example, allowing people to have a link to the natural environment and the health benefits, mentally and physically, of being outside.	No change considered necessary. JP-P7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of sport and recreation facilities. Paragraph 9.37 acknowledges that the provision of sport and recreation facilities is strongly linked to the provision of green infrastructure. Clause 6 of the policy, which seeks to protect and enhance the public rights of way network, and other policies in the Plan, including those within the Greener Places chapter (JP-G 2 and JP-G 6) seek to protect and enhance green infrastructure and green spaces, with further details set out in the Natural Environment Topic Paper [07.01.26] . The Plan should be read as a whole.
4	Sport England objects to para 9.38 and clauses 3, 4 & 7 suggesting an evidence based rather than standards based approach be adopted. NPPF no longer requires local standards for sports provision. Sport England's suggested amendment: Para 9.38 remove references to accessibility standards for sports facilities and replace with a separate sentence or paragraph: "The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach."	JP-P 7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities. Whilst clause 3 refers to the inclusion of recreation standards, it is clear that this would only be where appropriate and having regard to evidence of existing and future needs. Consistent with NPPF, paragraph 98, policies in district local plans would therefore be based on up-to-date assessments. Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.
5	Criterion 2 should clearly define how the 'common standard' for play provision is to be established, e.g. whether it will be through a Plan-wide SPD, or through individual District's SPDs or Local Plans?	No change is considered necessary. JP-P7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities.

Row	Main Issues	PfE Response
	If a GM-wide standard is to be developed it should be included within PfE itself, given that it will form part of the local Development Plan for the constituent authorities.	
6	Criterion 5 appears to go against Secured by Design principles which encourage natural surveillance of play and recreation areas to help reduce the fear of crime and general design principles to integrate such activity with neighbouring uses, creating sustainable and inclusive neighbourhoods. This criterion does not necessary add anything to the policy and so question whether it is appropriate to include it under Policy JP-P 7.	No change is considered necessary. The Plan should be read as a whole and Policy JP-G 6 requires development to support the positive use of nearby green spaces, such as by providing natural surveillance. In seeking to minimise potential for complaints, clause 5 of JP-P 7 merely recognises that this can occur in some instances and measures should be taken to minimise this. It does not preclude natural surveillance.
7	The policy refers to future local authority policies which have not yet been written or adopted. The requirements outlined will be addressed specifically in the local plans of the relevant GM authorities and this policy should not refer to these. Furthermore, the policy has not been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirement needs. Criterion (3) and (4) should be deleted.	No change is considered necessary. JP-P 7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities. The approach proposed in clauses 3 and 4 is considered consistent with NPPF paragraph 28 which confirms it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development' in accordance with NPPF paragraph 98 the detailed policies set out in individual local plans will be based on individual districts' assessments of open space and playing pitch requirements.

Chapter 10 – Connected Places

The main issues raised in relation to the policies within PfE 2021 Chapter 10 - Connected Places and the relevant PfE response is set out below:

Policy JP-C 1 – An Integrated Network

Row	Main Issue	PfE Response
1.1	Development location: The location of the allocations away from public transport provision and amenities such as schools, will exacerbate congestion, increase car dependency, and increase emissions, air/light pollution, noise and human health issues.	<p>Policies in the Plan provide a sufficient policy framework to address this matter. Policies JP-G6, JP-P1 and JP-D2 require new development to be supported by the necessary infrastructure, such as schools. Policy JP-C1 also supports development patterns that minimise the need for, and distance of, travel by unsustainable modes, and supports investment in transport infrastructure and services to deliver upon social, economic and environmental goals.</p> <p>The allocation Site Selection Background Paper [03.04.01], sets out the process followed to identify the allocations in PfE, including the consideration of access to transport services and facilities.</p> <p>All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate. The impact of the allocations on the transport network is examined in the Transport Locality Assessments [09.01.07 through to 09.01.28] which conclude that the potential impacts of the allocations on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p> <p>The Transport Topic Paper [09.01.29] summarises the other supporting evidence which address the issues raised.</p>
1.2	Public transport: The public transport network is not good enough to deliver modal shift or avoid reliance on the private car, particularly in relation to the allocations. Improvements in bus, Metrolink and rail capacity, reliability, frequency, affordability, and coverage are required across GM. Better integration between modes is needed.	<p>Policies JP-Strat 14, JP-C1 and JP-C3 and the Greater Manchester Transport Strategy 2040 [09.01.01] set out our policies and ambitions to improve the public transport network across Greater Manchester. An ambitious programme of investment in public transport is set out through Our Five Year Transport Delivery Plan 2021-2026 [09.01.02].</p>
1.3	Highways, traffic congestion and road safety: Concern about new development and new public transport hubs increasing the	<p>Policies in the Plan collectively provide a sufficient policy framework to address these issues. Traffic congestion is recognised as an issue within the supporting text of JP-J1, JP-C1, JP-C4 and other policies in the Plan and the Greater Manchester Transport Strategy 2040 [09.01.01]. Measures to address congestion and improve the</p>

Row	Main Issue	PfE Response
	volume of traffic on already congested roads, reduced opportunity for parking, and worsening road safety.	<p>public transport network are detailed within Connected Places policies (JP-C1 to C7) and within Our Five Year Transport Delivery Plan 2021-2026 [09.01.02].</p> <p>Policies JP-C1 to C7, JP-P1, JP-P5, and JP-P6 require new development to be designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, safe and secure, healthy and sustainable environments and include important amenities. Policy JP-C1 also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network. Safety is a principle which is applied fundamentally within the Greater Manchester Transport Strategy 2040 [09.01.01].</p> <p>The impact of the allocations on the transport network is examined in the Transport Locality Assessments [09.01.07 through to 09.01.28] which conclude that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p>
1.4	Climate change: Greater prominence needed of climate change issues. Investment should be targeted at sustainable options. Greater consideration of electric vehicles needed.	<p>The allocations policies and policies JP-C1 to C7 are considered to provide a sufficient policy framework to address climate change implications of transport. The provision of electric vehicle infrastructure is supported in policy JP-C 7.</p> <p>An ambitious programme of investment in sustainable modes, and electric vehicles, is set out in the Greater Manchester Transport Strategy 2040 [09.01.01] and accompanying Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. The supporting text of JP-C1 and GM Transport Strategy 2040 Appendix 1: Right Mix Technical Note [09.01.03] provides further detail on our ambitions for modal shift to help address climate change.</p>
1.5	Equestrian provision: no provision for equestrians who are vulnerable legitimate road users.	<p>Whilst the specific reference to equestrians within the Connected Places chapter of the Plan could improve the clarity and scope of the policy, it is not considered to be a soundness issue, therefore no change is proposed. The issue is adequately covered within the recently published “Streets for All Strategy” which is a sub-strategy of the Greater Manchester Transport Strategy 2040 [09.01.01] and will ensure that the competing needs of different road users are considered.</p>
1.6	COVID19: Implications and lessons from COVID19 need to be considered. Peak travel will not recover to previous levels and the implications for greater levels of working from home are not examined.	<p>An assessment of potential impacts of Covid-19 and Brexit on the economy was carried out in 2020 and 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>We recognise Covid-19 has had a profound impact on the ways in which we work and travel, however, there is currently insufficient evidence to amend the transport assumptions underpinning the PfE Plan. An adaptive planning approach and regular refresh of our strategic ambitions will allow flexibility in our approach, while</p>

Row	Main Issue	PfE Response
		progressing our vision for the “Right Mix” as set out in the Greater Manchester Transport Strategy 2040 [09.01.01] .
1.7	Plan delivery: Concern about whether the policies and interventions in the PfE Plan and associated 2040 Transport Strategy/Delivery Plan will be delivered. Not enough detail provided about the transport solutions, funding, or efficacy of measures.	<p>The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan including the site-specific allocation policies, is considered to be consistent with NPPF and NPPG.</p> <p>The Allocations Policies and Transport Locality Assessments [09.01.07 through to 09.01.28] are considered to set out the necessary and effective transport solutions to mitigate the impact of the allocations in an appropriate level of detail for a strategic plan.</p> <p>The overall framework for transport investment across Greater Manchester (GM) is contained in the Greater Manchester Transport Strategy 2040 [09.01.01] and Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. Further multi-year funding settlements are expected to be available over the course of the PfE Plan period.</p>
1.8	Strategic Road Network: No reference to any infrastructure requirements on the SRN.	Each individual Allocations Policy in Chapter 11 of the PfE Plan includes reference to SRN infrastructure requirements where these are directly necessary for the site to be allocated (as informed by the Transport Locality Assessments [09.01.07 through to 09.01.28]), although we will continue working with National Highways to further investigate the impact of the plan on the SRN.
1.9	People with a disability: Implications for people with a disability not fully considered.	Policy JP-C 4 provides a framework to better manage street space, further detailed within the recently published “ Streets for All Strategy ”. This ensures that the competing needs of all road users are better balanced to support sustainable growth and create an inclusive environment for people with a disability. An introduction to Streets for All approach is set out in the Transport Topic Paper [09.01.29] .
1.10	Duty to Co-operate: Ensure neighbouring authorities are consulted more closely to make sure there is a joint up approach in delivery.	The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan [01.01.01] .

Policy JP-C 2 – Digital Connectivity

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
2.1	Ensure that full digital connectivity is available within the rural areas around Manchester will support economic growth, whilst reducing development needs.	GMCA are committed to being a digital city-region that puts our residents at the heart of our plans and are working towards our ambitions to be recognised as a world leading digital city-region. This includes all areas of the city-region, urban and rural. The Greater Manchester Digital Blueprint , which sets out a three-year approach to meeting our ambitions for our city-region.
2.2	The policy should support investment in new and upgraded networks to increase the range and quality of coverage and ensure digital connectivity benefits existing, as well as new residents.	The PfE plan is primarily concerned with new development however the policy does encourage developers to work with telecoms operators to maximise coverage which will benefit existing and new residents. The Greater Manchester Digital Blueprint sets out a three-year approach to meeting our ambitions for our city-region. The GMCA has also prepared an Infrastructure Framework 2040 to support the delivery of the Plan.
2.3	The siting of telecommunications infrastructure should be sensitively considered as it can introduce man-made structures into rural landscapes that are free from development.	This is addressed on NPPF paragraph 115. It is not considered that it needs to be repeated in this policy.
2.4	Considering we still don't have fibre broadband in some areas this ambition seems to lack actual action.	A priority for the Greater Manchester Digital Blueprint is Digital Infrastructure - delivering high speed digital connectivity over full fibre and 4G & 5G mobile across the whole city region by 2025. The GMCA has also prepared an Infrastructure Framework 2040 to support the delivery of the Plan.
2.5	Clarify the approach to the funding of digital infrastructure to avoid unjustified costs being apportioned to developers.	This policy should be read in conjunction with policy JP-D1 Infrastructure Implementation, including clause 5 – which encourages early dialogue with developers and infrastructure providers; and clause 6 which requires applicants to prepare infrastructure phasing and delivery strategy for strategic sites, including when and who will fund and deliver it.
2.6	Update the Policy (page 203) to confirm that focus will be given to improving connectivity in GM's rural areas and: <ul style="list-style-type: none"> • withdraw any Allocation that is not aligned with this Policy • update the KPIs to ensure they measure all aspects of this Policy. 	No change is considered necessary. In line with the Greater Manchester Digital Blueprint this policy will support the delivery of high speed digital connectivity across the whole city region by 2025. JP-C2 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for digital connectivity. The allocation policies are supported by a proportionate evidence base and further details can be found in the relevant allocation topic papers. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.

Policy JP-C 3 – Public Transport

Row	Main Issue	PfE Response
3.1	Development location: Concerns around where the allocations are located and those that are not developed with public transport at the forefront will exasperate local road infrastructure.	<p>The relevant allocation policies are supported by a proportionate evidence base, detailing the mitigation – including public transport improvements – required to support development.</p> <p>The process followed for the site selection of allocations, set out in the Site Selection Background Paper [03.04.01], included criterion related to public transport accessibility.</p> <p>The Transport Locality Assessments [09.01.07 through to 09.01.28] conclude that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p>
3.2	Right Mix: Concern that the allocations do not reflect the 2040 Right Mix vision.	<p>All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility where appropriate.</p> <p>The Allocation Policies are informed by the Transport Locality Assessments [09.01.07 through to 09.01.28] which analyse the potential impact of each allocation on the local transport network and identify the indicative walking, cycling and public transport improvements that are necessary for, or would support, the allocation in order to promote sustainable transport and help achieve the Right Mix vision. Therefore, it is considered that development, which is in accordance with the allocation policy, would contribute to achieving the Right Mix vision outlined in paragraph 10.25 of the PfE Plan.</p>
3.3	Public transport: The public transport network does not provide a good enough alternative to the car due to the removal of services, cost and lack of investment, especially in more rural areas. Services are already at/overcapacity and crowded at peak times.	<p>Policies in the Plan provide a sufficient policy framework to address these issues. Policies JP-Strat 14, JP-C1 and JP-C3 and the Greater Manchester Transport Strategy 2040 [09.01.01] set out our policies and ambitions to improve the public transport network across Greater Manchester. An ambitious programme of investment in public transport is set out through Our Five Year Transport Delivery Plan 2021-2026 [09.01.02].</p>
3.4	Highways infrastructure: Issues around road infrastructure and how detrimental this will be to increasing congestion and reliability of public transport.	<p>Policies in the Plan collectively provide a sufficient policy framework to address these issues. Traffic congestion is recognised as an issue within the supporting text of JP-J1, JP-C1, JP-C4 and other policies in the PfE Plan and the Greater Manchester Transport Strategy 2040 [09.01.01]. Measures to address congestion and improve the public transport network are detailed within Connected Places policies (JP-C1 to C7) and within Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. The policy supports measures to improve routes, services and upgrades to the public transport network, including whole route upgrades to improve public transport journey times and reliability.</p>
3.5	Climate change: Due to the importance of the climate emergency, public transport needs greater improvement and investment in	<p>Policies in the Plan collectively provide a sufficient policy framework to address these issues. Policies JP-Strat 14, JP-C1 and JP-C3 and the Greater Manchester Transport Strategy 2040 [09.01.01] set out our policies and</p>

Row	Main Issue	PfE Response
	order to encourage behaviour change. This includes increasing capacity and options on multiple modes across GM, whilst making PT inclusive for all and a focus on rural areas.	ambitions to improve the transport network and tackle climate change. An ambitious programme of investment in public transport is set out through Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] .
3.6	HS2: HS2 should be given greater prominence within the policy due to its impacts on biodiversity, congestion and the local environment.	HS2 is described in the supporting text for Policy JP-C 3 and is referenced as “a hub of high-speed rail to London and Northern Powerhouse Rail” within the policy. No modifications considered necessary.
3.7	COVID19: The implications of COVID19 should be fully considered and plans should be amended accordingly.	<p>An assessment of potential impacts of Covid-19 and Brexit on the economy was carried out in 2020 and 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>We recognise Covid-19 has had a profound impact on the ways in which we work and travel, however, there is currently insufficient evidence to amend the transport assumptions underpinning the PfE Plan. An adaptive planning approach and regular refresh of our strategic ambitions will allow flexibility in our approach, while progressing our vision for the “Right Mix” as set out in the Greater Manchester Transport Strategy 2040 [09.01.01].</p>
3.8	Viability of non-allocated sites: Viability assessments of non-allocated sites must be undertaken.	A Strategic Viability Assessment [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Planning applications for development of non-allocated sites will need to be accompanied with a Transport Assessment which examines the improvements to transport infrastructure and transport services, as a basis for contributions necessary to bring forward the site. In addition, depending on the location of the site, contributions towards interventions set out in the Our Five Year Transport Delivery Plan [09.01.02] may be appropriate.
3.9	Plan delivery: More details about proposed public transport interventions and mechanisms for delivery are needed. Further clarity needed on contributions from developers.	<p>No modifications are considered necessary. The Allocation Policies identify indicative public transport improvements that are necessary for, or would support, each allocation (informed by the Transport Locality Assessments [09.01.07 through to 09.01.28]).</p> <p>A Strategic Viability Assessment [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>

Policy JP-C 4 – Streets for All

Row	Main Issue	PfE Response
4.1	Development location: Concerns PfE policy to delivering more homes will force people to drive. Will also exacerbate capacity issues on the road network and create further congestion.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits from access to public transport) as set out in the Existing Land Supply and Transport Technical Note [09.01.05] and associated addendum [09.01.06].</p> <p>The Site Selection Background Paper [03.04.01] outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in Appendix 6 Site suitability methodology [03.04.08].</p>
4.2	Highways and road safety: Concern that there are already a high number of accidents. Details required of how road safety can be addressed in more rural areas. Roads and pavements are not maintained and often unsafe for cyclists and pedestrians. New modes, such as powered two wheelers, need greater safety consideration. Safety issues for women.	<p>Policy JP-C 1 supports transforming transport infrastructure and services to meet customers' needs by being safe and secure. The policy also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network. A number of other policies within the PfE Plan, such as JP-C4 and JP-C5, alongside Greater Manchester Transport Strategy 2040 [09.01.01] address highway safety.</p> <p>The Streets for All approach, set out in Policy JP-C4 and the Greater Manchester Transport Strategy 2040 [09.01.01], is a people-centred, balanced approach that considers all street types and the needs of all road users but places a strong emphasis on prioritising sustainable journeys (walking, cycling and the use of public transport) where appropriate. "Safe and Secure" and "Well-maintained" are both guiding network principles of the Greater Manchester Transport Strategy 2040 [09.01.01], and the recently published Streets for All sub-strategy.</p>
4.3	Accessibility: Some people have to rely on private cars.	<p>Policy JP-C4 recognises the needs of those with reduced mobility and presents an opportunity to provide far greater choice for those currently with restricted travel options. Modification of the policy is therefore not considered necessary. The Greater Manchester Transport Strategy 2040 [09.01.01], and subsequently released Streets for All sub-strategy recognises these needs.</p>
4.4	Pollution: No consideration of air quality or noise pollution that arises from new developments/increased traffic, especially on greenfield land.	<p>Policies in the PfE Plan provide a sufficient policy framework to address these issues. Air Quality and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 provide a sufficient policy framework to encourage mode shift and address carbon emissions from transport. Policies JP-P1, JP-P5 and JP-P6 ensure new development includes local infrastructure such as green spaces, schools and medical facilities, where appropriate, to reduce the need to travel longer distances by car. The Plan needs to be read as a whole, therefore no change is considered necessary.</p>

Row	Main Issue	PfE Response
4.5	Lack of adequate planning: No forward planning of transport infrastructure has been undertaken and a laissez-faire approach that suggests people will only change their behaviour when roads become more constrained has been adopted.	<p>The GMCA, the Local Authorities and TfGM have a clear policy direction (JP-Strat 14) and major programme of investment in sustainable transport which is expected to transform travel patterns in GM.</p> <p>Our approach, set out in Policy JP-Strat 14 and JP-C1 to JP-C7 and the GM Transport Strategy 2040 [09.01.01], is to pro-actively improve public transport and active travel alternatives, to change travel behaviour, and make the best use of our limited road space.</p>
4.6	Behaviour Change: The Plan needs to explain how it will influence behaviour change towards more active and sustainable modes.	<p>The Streets for All policy JP-C4 presents a series of solutions that help encourage sustainable travel. Aligned with other PfE policies JP-C1 to C7 it creates a strong policy framework that supports the transformation of travel patterns across the plan area.</p> <p>The policy justification within the Plan for the Connected Places chapter [10.27] refers to the need for targeted travel behaviour change activities. This reflects the Greater Manchester Transport Strategy 2040 [09.01.01] which includes maintaining a programme of interventions which are to be supported by encouraging sustainable travel behaviour change. Modification of the policy is therefore not considered necessary.</p>
4.7	Plan delivery: The Plan needs greater explanation of how the policy will be achieved.	<p>Policies within the Greater Manchester Transport Strategy 2040 [09.01.01] and recently published Streets for All sub-strategy include the development and implementation of 'Streets for All' principles and interventions. A number of interventions, consistent with these policies are proposed, or under delivery, within Our Five Year Transport Delivery Plan [09.01.02]. Our CRSTS submission includes a Streets for All Programme (Appendix 08) allocating funding to a number of Streets for All interventions and Streets for All principles will also be embedded in our Quality Bus Transit and Bus Corridor Upgrade packages proposed within our CRSTS Bus Programme (Appendix 01).</p>

Policy JP-C 5 – Walking and Cycling

Row	Main Issue	PfE Response
5.1	Location of new development: Concern that the allocations will be car dependent developments without adequate walking and cycling infrastructure and will sever existing walking and cycling routes discouraging active travel. Allocations should be withdrawn if cycle and walking access is inadequate.	The Plan provides a sufficient policy framework to address these issues. Policy JP-C5 supports ensuring that new developments are planned and constructed with walking and cycling as the primary means of local access, and fully integrated into the existing walking and cycling infrastructure in accordance with JP-C7. Policy JP-C7 requires all new development to prioritise safe and convenient access to the site and buildings for all users in accordance with the user hierarchy set out in Policy JPC-1. Policies JP-G6, JP-P1, JP-P5 and JP-P6 ensure new development will include local infrastructure such as green spaces, schools and medical facilities, where appropriate, to reduce the need to travel longer distances by car.
5.2	Traffic congestion, pollution and road safety: Concerns that traffic congestion, pollution and safety for vulnerable road users issues discourage walking and cycling. Also cycling infrastructure increase light pollution in rural areas.	<p>The Plan provides a sufficient policy framework to address these issues. Air Quality, pollution and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 provide a robust policy framework to encourage mode shift to more sustainable travel options and also help address pollution and carbon emissions from transport.</p> <p>Whilst it is considered that specific reference to light pollution could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change to the policy is proposed.</p>
5.3	Cycling - quality, safety and maintenance: Concern about the quality, safety and maintenance of cycling infrastructure.	<p>Policy JP-C5 supports the creation of high quality, safe, attractive and integrated walking and cycling infrastructure, using national and locally adopted design guidance (which includes guidance on design for non-standard cycle parking).</p> <p>The Greater Manchester Transport Strategy 2040 [09.01.01] outlines our ambition is to bring the transport network into a good state of repair, and maintain it, to ensure that it can withstand unexpected events, exceptional demand, and severe weather.</p>
5.4	Disability access: Concern that disabled access is not properly addressed.	<p>Policy JP-C1 includes within the Global Street Design Guide hierarchy, pedestrians and people using mobility aids as the highest priority. In relation to new development Policy JP-C7 prioritises the safe and convenient access for all users in accordance with the user hierarchy in Policy JP-C1.</p> <p>Policy JP-C4 aims to ensure that the design and management of streets follow a “Streets for All” approach thereby ensuring that streets are welcoming for all and respond to the needs of those with reduced mobility.</p>
5.5	Delivery of the policy: Concern about whether delivery of the policy is realistic and question whether there is sufficient funding available to deliver and maintain infrastructure.	Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of sustainable transport interventions. Development of the GM Bee Network is a key priority as set

Row	Main Issue	PfE Response
		out in Our Five-Year Transport Delivery Plan 2021-2026 [09.01.02] . It is anticipated the further multi-year funding settlements will be available over the course of the PfE Plan period.

Policy JP-C 6 – Freight and Logistics

Row	Main Issue	PfE Response
6.1	Sustainable freight: Greater emphasis is need on modal shift of freight from road to water and rail.	The plan policies include specific support to the modal shift of freight to more sustainable modes in Policy JP-C 6. No modifications needed.
6.2	Development location: The allocation sites proposed for logistics use are car based and unsustainable. Use business parks which have available capacity. If logistics sites are reliant on road-based freight they should not be approved.	Given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The existing land supply, including land still available at existing business parks, was taken into account in developing the employment land requirement over the plan period. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.02] .
6.3	Expansion of air freight: Concerns the policy gives unconditional support for the growth of air freight. Policy should be amended to state air freight activities will not be expanded until climate-friendly air fuel is available.	Planning applications for the expansion of freight activities at Manchester Airport will be subject to relevant national and local policy (including other policies in the PfE Plan) at the time of determination. Authorities will work with the airport and its customers, partners and stakeholders to reduce the environmental impact of its operations. No modifications considered necessary.
6.4	Highways SRN: The policy acknowledges that many logistics sites in Greater Manchester will take advantage of the strategic location within the national motorway network and therefore naturally will be reliant on road-based freight.	All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility and mitigate SRN highways impacts where appropriate. The impact of the allocations on the transport network is examined in the Transport Locality Assessments [09.01.07 through to 09.01.29] for each allocation.
6.5	Economic Growth: The policy does not go far enough to support economic growth. The policy should promote new development for storage and distribution use in accordance with site allocations and in suitable, strategically accessible locations.	Modification is not considered necessary because the allocations policies clearly set out which allocations are suitable strategic locations for logistics.
6.6	National Policy: Freight and logistic policy is inconsistent with national policy.	Without further detail it is not possible to further examine the respondent's concerns. However, the plan is considered to be consistent with NPPE .

Policy JP-C 7 – Transport Requirements for New Developments

Row	Main Issue	PfE Response
7.1	Transport infrastructure and capacity: Concern that the capacity of existing transport infrastructure is inadequate to accommodate the projected growth and is not currently well maintained.	<p>All allocations policies include measures to address capacity concerns by delivering sustainable transport infrastructure and improved public transport accessibility, and mitigate other highways impacts where appropriate. The impact of the allocations on the transport network is examined in the Transport Locality Assessments [09.01.07 through to 09.01.28] which conclude that the potential impacts of the allocations on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p> <p>Policy JP-C1 is supported by the Greater Manchester Transport Strategy 2040 [09.01.01] which sets out our ambitions to improve the transport network. All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five-Year Transport Delivery Plan 2021-2026 [09.01.02].</p>
7.2	Phasing of infrastructure: New infrastructure should be in place before development.	<p>The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site-specific allocation policies, is considered to be consistent with NPPF and NPPG.</p> <p>Policy JP-D1 and JP-D2 are supported by Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] in terms of funding and delivering transport interventions.</p> <p>Outline indicative phasing for all necessary transport infrastructure is included in the Transport Locality Assessments [09.01.07 through to 09.01.29] however, the specific phasing of interventions will be determined through the normal planning process by the preparation of a Transport Assessment setting out infrastructure and phasing of delivery.</p>
7.3	Environmental issues: Concern that new development and new roads would increase car use, impact on air quality and increase carbon emissions, as well as impact the health and wellbeing of local residents and wildlife.	<p>Policies in the Plan provide a sufficient policy framework to address these issues. Air Quality and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 provide a robust policy framework to encourage mode shift and address carbon emissions from transport. Policy JP-G9 seeks opportunities for net enhancement of biodiversity. Policies JP-P1 and JP-P6 ensure new development are sustainable and healthy.</p>
7.4	Location of new development: Concern that development on greenfield/green belt land would not be accessible by public transport and result in increased car use.	<p>The Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The Site Selection Background Paper [03.04.01] outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for</p>

Row	Main Issue	PfE Response
		<p>identification of allocations in Appendix 6 Site suitability methodology [03.04.08]. Policies JP-C1 to C7 provide a robust policy framework to encourage mode shift.</p> <p>The GMCA, the Local Authorities and TfGM have a clear policy direction (JP-Strat 14) and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040.</p>
7.5	Site viability: The policy wording should be amended to include “subject to site viability”, and related viability modifications requested (including removal of obligations to subsidise public transport where services would be inadequate and obligation to make appropriate provision of deliveries and servicing).	The proposed modifications are not considered necessary. Viability assessment work undertaken for the PfE Plan is set out in the Places for Everyone Strategic Viability Assessments [03.01.01- 03.01.04] which have been published alongside the Plan. These have considered the implications of all policies at an individual allocation level and for the plan as a whole. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE Plan will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
7.6	Level of detail of the transport evidence: The Transport Locality Assessments should contain a greater level of detail with regard to the existing traffic flow on the network and the funding/viability of interventions.	<p>A proportionate transport evidence base, using the best available data, has been provided to inform the allocations policies. The level of detail presented in the Transport Locality Assessments [09.01.07 through to 09.01.28] reflects the strategic nature of the plan. The approach recognises that more detailed Transport Assessments will be required to both reflect the traffic patterns at the time of the planning application and to prepare final, rather than indicative, proposals to mitigate the impact of the development.</p> <p>Viability assessment work is set out in the Strategic Viability Assessments [03.01.01- 03.01.04]. These have considered the implications of all policies at an individual allocation level and for the plan as a whole, therefore no modifications to the policy are considered necessary. NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>
7.7	Delivery: An Infrastructure Delivery Plan should set out the proposed infrastructure improvements and test the deliverability and viability of such proposals.	<p>Policies in the Plan provide a sufficient policy framework to address this matter. All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate. These were informed by the Transport Locality Assessments [09.01.07 through to 09.01.28] with the recommendations from the assessments factored into the viability assessments (see Strategic Viability Assessments [03.01.01 – 03.01.04]).</p> <p>In addition, all strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. TfGM is committed to maintaining an up to date Five Year Delivery Plan throughout the PfE Plan period. A separate Infrastructure Delivery Plan is not considered necessary.</p>

Row	Main Issue	PfE Response
7.8	Parking: The policy should include GM parking standards for new residential and employment developments.	Policy JP-C 7 requires new development to comply with any parking standards set out in local plans. Car parking standards are set out in Local Plans to allow the flexibility for each Local Planning Authority to reflect the different requirements for car parking in different locations across the local authority area. No modifications to the policy are considered necessary.

Chapter 12 – Delivering the Plan

The main issues raised in relation to the policies within PfE 2021 Chapter 12 – Delivery the Plan and the relevant PfE responses are set out below.

PfE 2021 Policy JP-D1 Infrastructure Implementation

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	Infrastructure services, including road, are at full capacity and without major investment, and without the use of green field and Green Belt beyond what is proposed, the developments will not be achievable.	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently (JP-S1). By working together, the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.</p> <p>Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver the vision and objectives of the Plan. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10].</p> <p>GMCA, the Local Authorities and TfGM have a clear policy direction (JP-Strat 14) and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040 which will enable the delivery of our growth ambitions as set out in the GM Transport Strategy Appendix 1 – Right Mix Technical Note [09.01.03].</p> <p>Policy JP-C 1 supports transforming transport infrastructure and services in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity.</p> <p>Greater Manchester Transport Strategy 2040 [09.01.01] sets out our ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. The programme of interventions set out in the Five Year Delivery Plan reflects the growth aspirations of the PfE Plan in order to support sustainable development. The allocation topic papers for each allocation set out the specific infrastructure requirements for that allocation.</p> <p>Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. It is envisaged that further multi-year infrastructure funding settlements will be awarded in future years over the course of the PfE Plan period.</p>
2	<p>There is</p> <ul style="list-style-type: none"> • uncertainty regarding infrastructure delivery and • a lack of clarity about the funding mechanism proposed and • no evidence about its impact on development viability. 	<p>A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Applications for planning permission will need to comply with the requirements of these policies.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>The PfE is not accompanied by an Infrastructure Delivery Plan to demonstrate how the infrastructure needs have been determined for each of the strategic sites and how the needs will be funded and delivered.</p> <p>The policy falls significantly short of the requirements of the NPPF around infrastructure</p>	<p>All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. The Transport Locality Assessments [09.01.07 through to 09.01.28] set out the required transport infrastructure improvements for each allocation that are necessary, or would support, the allocation in order to mitigate the impact of development.</p> <p>Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the policies in the plan, including the site allocations.</p> <p>Infrastructure Delivery Plans are not required by NPPF. PfE provides an appropriate framework for delivery and has been informed by discussions with strategic infrastructure providers as set out in the Delivery Topic Paper[03.01.05]</p> <p>It is considered that the approach taken to infrastructure is appropriate and in line with NPPF.</p>
3	Due to the size of the greenbelt sites allocated within the plan it is unlikely that the infrastructure can be provided in time to bring these sites forward within the plan period, making the plan unsound.	Allocation policies set out the required infrastructure [03.01.04] and have been subject to a Strategic Viability Study. Further information is provided in the individual Allocation Topic Papers. It is considered that the trajectories set out in the Allocation Topic Papers are realistic and deliverable.
4	<p>The infrastructure phasing and delivery strategies are not justified or effective for smaller and self-contained sites.</p> <p>The PfE should establish a threshold below which such strategies are not required. Recommends a threshold of 1,000 dwellings or 100,000 sqm floorspace.</p>	<p>The Plan is considered sound in that a number of policies in the PfE Plan provide the policy framework to address infrastructure matters for smaller sites. Policies JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.</p> <p>Applications for planning permission will need to comply with the requirements of these policies.</p> <p>All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate.</p> <p>Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate the viability of the policies in the plan.</p>
5	Concern that more educational facilities medical services, roads and transport will be required for all the new developments. There is a lack of a suitable road network, and access to most services (shops, doctors, chemists and hospitals).	<p>These matters are addressed by a number of policies in the PfE Plan, for example, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7. Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Applications for planning permission will need to comply with the requirements of these policies.</p> <p>The policies in the Connected Places chapter of the Plan provide a sufficient policy framework to support the creation of a better integrated network, with policies JP-C1, JP-C4 and JP-C7, in particular, ensuring new developments are well integrated into the network.</p> <p>All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. Details are found in the individual Allocation Topic Papers.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6	Difficult to have a coordinated approach with the boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning and funding to ensure the infrastructure needed to support the vision and objectives of the plan is developed and implemented effectively, when Stockport isn't involved.	Greater Manchester has a good track record of delivering ambitious infrastructure programmes as set out in the Delivery Topic Paper [03.01.05] . Stockport is still part of the Combined Authority and will work with the other 9 boroughs to deliver strategically important infrastructure.
7	Collaboration is needed to ensure that utilities infrastructure is planned and delivered in a coordinated way, such that any obstacles to delivery are removed. PfE goes beyond the remit of a Development Plan and places a disproportionate and unnecessary burden on the development industry.	Policy JP-D1 makes it clear that a long term strategic approach to place shaping involving collaboration with infrastructure providers and delivery partners is essential. The Delivery Topic Paper [03.01.05] outlines the arrangements that Greater Manchester has already in place, including the Strategic Infrastructure Board to ensure that relationships are in place to support delivery of the plan. It is considered that the requirements on the development industry, as set out in the plan, for example policies G6, G9, C7, P5, P6, P7 are proportionate and in line with NPPF.

PfE 2021 Policy JP-D2 Developer Contributions

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	PfE districts have a poor success rate in obtaining developer contributions. Tax payers shouldn't be funding developments.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to developer contributions.
2	All developments including windfall should make a fair contribution towards infrastructure. Greater requirements should not unfairly be placed on allocated sites.	No change considered necessary. The policies in the plan apply to all new development not just the site allocations. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.
3	The policy should be amended to also allow for new evidence to justify a detailed viability assessment to be undertaken. PfE should also be clear about the mechanisms used to secure contributions and remove reference to the potential for a Strategic Infrastructure Tariff.	The proposed modification is not considered necessary. Strategic viability assessments [03.01.01-03.01.04] have been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.
4	The policy text should highlight NPPF para.56. Concerns are raised over the Strategic Viability work undertaken to support the plan. <ul style="list-style-type: none"> Assumptions made about costs, values and profit levels Lack of transparency in appraisals in relation to typologies and PfE policy requirements 	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. A Strategic Viability Assessment Stage 1 was undertaken in accordance with the 2019 revised National Planning Policy Framework and the relevant sections of the Planning Practice Guidance (PPG). An Addendum was prepared to update the assessment in the light of the Stockport withdrawal and to review the assumptions in the light of Covid 19. [03.01.01-03.01.03] A Strategic Viability Stage 2 report was undertaken [03.01.04] in relation to the allocated sites. It is considered that a proportionate evidence base has been provided to support the policy.
5	The policy should accord with national policy and set out what development contributions developers are expected to contribute towards.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.

Chapter One, Chapter Two and General/Other Responses

A summary of the main issues raised in relation to Chapter One, Chapter Two, Appendix A and general/other responses such as matters relating to consultation, compliance, plan wide and suggested omissions from the Plan.

PfE 2021 Chapter One - Introduction

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1	The introductory sections of the plan contradict other parts of the plan and the statements are not justified, e.g. Paragraphs 1.36. 1.44. 1.47	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.</p> <p>As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address viability issues and other issues such as uncertainties arising as a result of Covid-19 and Brexit. It is considered that this approach is consistent with NPPF and Chapter One appropriately summarises it. Therefore, no change is considered necessary</p>
2	Concern that references to matters such as Manchester Airport, growth in the north of the conurbation and HS2 should be more fully justified before inclusion in the introductory chapter	In setting the scene for the whole PfE Plan, Chapter One makes references to key assets and parts of the strategy which will bring opportunities to Greater Manchester. Some of these references are to national projects and/or schemes which have been approved outside of the PfE framework. However, where necessary, detailed evidence is provided in the Supporting Documents . It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary
3	Insufficient detail has been provided in relation to natural environmental matters	In setting the scene for the whole PfE Plan, Chapter One provides a brief summary in relation to natural environmental matters. Appropriately, full details in relation to the policy framework for the natural environmental, can be found in the policies in the Greener Places Chapter. It is not considered that the issue raised is a soundness issue, therefore no change is considered necessary
4	Insufficient detail has been provided in relation to the allocations and the required mitigation / policy framework for the sites	Chapter One sets the scene for the whole PfE Plan, it provides an appropriate summary of the spatial strategy and policy framework / ambitions to deliver it. It would not be appropriate for such an overview chapter to provide points of detail as suggested. Instead, where necessary, detailed evidence is provided in the Supporting Documents , including for the

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		allocations. It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary
5	Reference should be made to the Peak District National Park given the role it performs for residents of the PfE Plan area, in particular those in Oldham.	Chapter One sets the scene for the whole PfE Plan, it provides an appropriate summary of the Plan area. It is not considered that the change being requested is a soundness issue, therefore no change is considered necessary

PfE 2021 – Chapter Two Context

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	Concern that references to matters such as Manchester Airport, growth in the north of the conurbation and HS2 should be more fully justified before inclusion in the introductory chapter	In setting the context for the whole PfE Plan, Chapter Two makes references to key assets and parts of the strategy which will bring opportunities to Greater Manchester. Some of these references are to national projects and/or schemes which have been approved outside of the PfE framework. However, where necessary, detailed evidence is provided in the Supporting Documents . It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary
2	There should be stronger references to the environment and transport, including active travel	It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary. Chapter 2 provides a brief summary of the context for the Plan in relation to the natural environment, transport and other matters which are considered important to the context of the Plan. Appropriately, full details in relation to the various matters can be found in the policies in the relevant chapters, the plan should be read as a whole.
3	The Peak District National Park boundary should be shown in Figure 2.1 to reflect its role for residents of the PfE Plan area, in particular those in Oldham.	Disagree. Figure 2.1 shows a map of the PfE district boundaries, it is not considered appropriate to provide this level of detail in such an illustrative map
4	A separate sub-section should be included to contextualise the rest of the city region (not just the Core Growth Area) in terms of its scale, population, household stock, etc. This would provide greater clarity and context for the intended vision and spatial strategy set out in the following Chapters of the PFE plan	It is considered that Chapter Two provides sufficient context for the rest of the PfE Plan. References are made throughout the chapter to all parts of the plan area, for example paragraphs 2.4 to 2.9 and 2.29 to 2.32. Therefore no change is considered necessary
5	Paragraph 2.7 only lists Brexit and Covid as the key challenges facing the districts, climate change and biodiversity should also be listed. The proposals in the plan do not appear to have taken climate changes into consideration and will make matters worse.	It is considered that Chapter Two provides sufficient context for the rest of the PfE Plan. Paragraph 2.7 appropriately refers to Brexit and Covid in the context of the chapter. Climate issues are addressed in Chapter 5 and were taken into consideration through the Strategic Environmental Assessment . No change is considered necessary

PfE 2021 – Appendix A Replaced District Local Plans

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	The Protected River Valley Policy in Bury's Local Plan should be retained. The removal of this policy protection did not form part of the consultation and is unlawful	Appendix A refers to PfE Policy JP-G3 (River Valleys and Waterways) replacing Bury's UDP Strategic Part 1 Policy on River Valleys (OL5). Three Part 2 policies sitting underneath OL5 are to be saved until they are replaced through Bury's Local Plan: OL5/1 – Designation of River Valleys – which effectively justifies the designated River Valley boundary; OL5/2 – Development in River Valleys – which sets out the approach towards development in designated River Valley areas; and OL5/3 – Riverside and Canalside Development in Urban Areas – which seeks to ensure that new riverside or canalside development maintains an open corridor. Therefore, there will be continued protection afforded to these areas through both the PfE and Bury's local Plan.
2	Concern that the policies being superseded by the PfE Plan will leave a policy vacuum in terms of the historic environment at the local level. The changes to existing local plan policies should be set out clearly in a supporting document or reference to the relevant paragraph numbers and criteria being superseded should be included in Appendix A.	It is considered that Appendix A provides an appropriate level of detail in terms of identifying which policies are to be replaced. Appendix A refers to a number of strategic policies in existing district local plan policies which will be replaced by the PfE Plan. These do not form the entirety of policy protection in the districts in relation to the historic environment. The detailed, "part 2" style policies are to be saved until they are replaced through the districts' individual Local Plans. Therefore, there will be continued protection afforded to historic environment through both the PfE and district local plans.

PfE 2021 – Consultation Issues

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
CON1	The consultation and the preparation of the PfE should have been suspended until the planning reforms have been completed Summary of Appendix A Replaced District Local Plans main issues with summary responses	As made clear by the Government's Chief Planner, the Government has made it very clear that local planning authorities should not delay plan preparation. For example please see the Chief Planners Newsletter April 2021 (publishing.service.gov.uk) . No change required
CON2	The quality, timing and nature of the public consultation and engagement has been inadequate for a plan of this nature particularly during a pandemic. The methods used have been difficult to navigate and the material too complicated. Information should be made available to all residents affected by the proposals. The consultation has not met Statements of Community Involvement and/or the Gunning Principles and the consultation should be repeated	It is acknowledged that the Regulation 19 version of the Plan is accompanied by a large amount of supporting documentation however, a number of steps were taken to assist readers in understanding the material. This included topic papers explaining the technical evidence base, which were provided on the Supporting Documents page of the GMCA website. Additionally the Consultation 2021 pages on the GMCA website had explanatory information about the consultation, including FAQs and how to make an effective representation and in anticipation of continued restrictions arising from the pandemic, the PfE districts also developed a virtual exhibition space . In relation to the details of the consultation / engagement, the Regulation 22 Statement of Consultation includes individual compliance statements for each of the nine districts. Therefore, it is considered that the consultation met the requirements of the relevant regulations.
CON5	The documents produced are too lengthy and complicated to understand what is proposed and therefore to enable effective engagement	It is considered that the Plan is supported by proportionate evidence, required to justify the plan in accordance with NPPF section 3. However, in view of the technical nature of some of the evidence base documents, topic papers were provided on the Supporting Documents page of the GMCA website to explain the evidence base.

PfE 2021 Relationship with District Local Plans

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
LP1	The Plan refers to each PfE authority producing its own local plan and masterplans for the allocations. No details have been given about when these plans will be available and what the scope will be for these plans and whether development will be able to proceed before they are approved. This detail should be included in the PfE Plan and there should be a commitment to bringing forward local plans at the earliest opportunity to enable local engagement and to avoid development taking place in unsustainable locations	The production of more detailed local plans and/or masterplans will be part of the delivery mechanism for policies in this plan, as required within the policies of PfE. The timetables for the individual local plans will be a matter for the individual districts to agree. Details will be made available within the relevant district's Local Development Scheme and engagement will be in line with individual Statements of Community Involvement. Similarly, the scope of the local plans will be a matter for the individual districts to determine. Chapter 11 (paragraph 11.5) details that some additional sites outside the urban area are required to deliver our inclusive growth needs and makes it clear that it is the role of this plan to identify these sites. Therefore, no change is necessary
LP6	The PfE Plan should make it clear what is to be covered in the district local plans and this should include the need for the district local plans to assess/review the need for development. If there are additional needs to those in the PfE, Local Plans should allocate land to meet any such identified needs, including within the Green Belt	No change is considered necessary. The scope of the local plans will be a matter for the individual districts to determine. However, paragraphs 1.57 and 1.58 make it clear that the PfE sets the strategic spatial context for the nine district local plans. Chapter 11 (paragraph 11.5) details that some additional sites outside the urban area are required to deliver our inclusive growth needs and makes it clear that it is the role of this plan to identify these sites. Therefore, the allocations identified in PfE together with the existing land supply are considered to provide sufficient land to meet the land supply targets in Chapters 6 and 7 of the Plan.

PfE 2021 – SEA / Integrated Assessment / Sustainability Appraisal

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
	Integrated Assessment	
1	The Sustainability Appraisal Scoping Report fails to provide an appropriate / robust framework to test the Plan against, including in relation to the Green Belt, Green Infrastructure, wildlife, climate change and working from home	No change is considered necessary. The IA objectives and assessment criteria were reviewed prior to preparing PfE2021, including in relation to climate change and they are considered to be robust and in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the Integrated Assessment Scoping Report (02.01.01) and the Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal .
2	The justification for the use of differing data sources and time scales for the data in the Sustainability Appraisal Scoping Report is unclear. For example in relation to the use of differing ONS data, data relating to the housing markets, LHN references for Greater Manchester between 2018 and 2037 etc.	No change is considered necessary. It is considered that the Integrated Assessment Scoping Report (02.01.01) is robust and has been prepared in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the Integrated Assessment Scoping Report (02.01.01) and the Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal .
	Equalities Impact Assessment	
3	An Equalities Impact Assessment should be carried out for each allocation	No change is considered necessary. An Equalities Impact Assessment has been worked into the Integrated Assessment objectives and criteria and has been carried out for each PfE allocation. See Section 2.1.2 of the Integrated Assessment Scoping Report (02.01.01).

PfE 2021 Duty to Co-operate

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	No details have been provided as to how the "Duty to Cooperate" will be achieved. It is not acceptable to limit the Duty to Co-operate with neighbouring boroughs to Stockport, each of the authorities in the plan the area has their own neighbours	As detailed in Section One of the supporting documents list (Duty to Co-operate) a Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021. These documents have since been updated to reflect the ongoing engagement with our neighbouring authorities and duty to co-operate bodies. It is considered that these documents demonstrate effective and on-going collaboration in line with NPPF
2	It is unclear what agreements are in place with Stockport and whether they will be relying on the other 9 districts to meet part of its need going forward. Although the PfE districts are not obligated to carry Stockport's housing requirement, the Duty to Co-operate does require the matter to be explored and it is clear from previous iterations of the GMSF that there was capacity within the nine PfE authority areas to accommodate some of Stockport's needs either through urban supply or the release of additional Green Belt land. The Duty to Co-operate has not been satisfied when it comes to meeting housing needs, particularly in relation to meeting unmet needs within Stockport	A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in Section One of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate Stockport. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date in terms of employment and housing, respectively. As explained in that document, Stockport MBC has been unable to provide evidence demonstrating unmet need. In the light of this, the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone
3	Duty to co-operate means to co-operate with the needs and opinions of the local people, the local people do not want the new houses on green spaces and the plan should be stopped	Duty to co-operate is a legal obligation under S33A of the Planning & Compulsory Purchase Act 2004 as amended. The list of organisations that the PfE districts need to co-operate with is detailed in the Statement of Common Ground, published alongside the PfE2021 in Section One of the supporting documents list. Separate to this, the individual districts are required to carry out engagement in line with their individual Statements of Community Involvement. The Regulation 22 Consultation Document details the districts' compliance with these statements. It is considered that the PfE districts have met their obligations in respect of both matters and no change is needed
4	There does not appear to be any allowance for meeting unmet need arising from neighbouring authorities particularly Stockport. The situation with Stockport is only one	A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
	example and it is probable that the GMCA has made similar failings with other neighbouring authorities	Section One of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate not only with Stockport, but also their other neighbouring districts. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date in terms of employment and housing, respectively. It is considered that the PfE districts have met their obligations in respect of Duty to Co-operate and no change is needed
5	It is incorrect to state that the 35% uplift in Manchester's LHN must be met within Manchester alone and cannot be met elsewhere within the nine districts such as Salford, Trafford and Oldham. Agreement in relation to this matter should be reached through the provisions of Duty to Co-operate	Disagree, NPPG paragraph 035 Reference ID: 2a-035-20201216 is clear that the 35% uplift applied to should be met by the cities and urban centres themselves and not the surrounding areas. Therefore, as Manchester City is the only PfE district to which this applies, the uplift should be met within its district
6	A request has been made for a separate Statement of Common Ground with the combined authority to cover matters agreed with respect to the impact of the PfE at the SRN. Although it is recognised that substantial evidence has been provided as part of the PfE process, the existing Statement of Common Ground does not provide sufficient detail, particularly as work is still ongoing. Therefore a separate SoCG should be prepared more fully defines the scope of the ongoing work	Collaboration with National Highways has been ongoing since the Publication PfE documentation was published in August 2021. Updated documentation has been produced and submitted as part of the Submission documentation, which details the current position between the PfE districts and National Highways. As such it is considered that the PfE districts have met their obligations in respect of Duty to Co-operate and no change is needed
7	Duty to co-operate has been failed in relation to minerals	Disagree, Section 9 of the Submission version of the Statement of Common Ground (together with the Submission Log of Collaboration) demonstrates that the PfE districts have met their duties in relation to this matter.

PfE 2021 Legality of the Plan

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	The legality of the Plan needs to be tested in the courts. The changes between the GMSF 2020 draft and the PfE 2021 are too significant for the PfE 2021 Plan to proceed to Regulation 19 without a further Regulation 18 consultation stage	Sections 2 and 3, together with Appendix 1 of the report to the Places for Everyone Joint Committee, 20/07/2021 sets out the extent/nature of the changes, further details on the changes from GMSF to PfE2021 were also made available in the supporting documents. Having considered this evidence, the Committee resolved that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020). As such the provisions of S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply to the Plan. Therefore, the progression of the PfE Plan to Publication is considered in accordance with the relevant provisions of the Act and Regulations.
2	The PfE Plan has not been prepared in accordance with legal and procedural requirements as it is not in accordance with national policy and therefore it does not meet the requirement of soundness	It is considered that a proportionate evidence base has been provided to support the Plan and demonstrate that it has been prepared in accordance with legal and procedural requirements. The evidence base can be found the website here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
3	The plan has failed to demonstrate exceptional circumstances to amend the Green Belt, as required by NPPF	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
4	The Plan needs to be checked for consistency against the latest iteration of NPPF published on July 20th 2021 as this was after the Plan had been written	It is considered that the Plan remains consistent with NPPF, including the latest iteration published in July 2021
5	A number of the local Councils, including Bury, Oldham and Rochdale have failed to comply with their Statement of Community Involvement	The Regulation 22 Statement of Consultation provides details of the consultation / engagement including individual compliance statements for each of the nine districts.

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
		These documents demonstrate that the consultation met the requirements of the relevant regulations.
6	The PfE Plan has not been prepared in accordance with legal and procedural requirements as there has been no consideration of the reasonable alternatives.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] . The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The Plan has also been subject to an Strategic Environmental Assessment . It is therefore considered that appropriate consideration of reasonable alternatives has been undertaken
7	PfE is not legally compliant because it was produced before the Environment Bill and takes no account of the Bill and the proposals are contrary to the Bill. There should be more emphasis on brownfield sites and the Green Belt sites, should be removed as there is sufficient land in the existing supply to meet the needs	As made clear by the Government's Chief Planner, the Government has made it very clear that local planning authorities should not delay plan preparation. For example please see the Chief Planners Newsletter April 2021 (publishing.service.gov.uk) . Notwithstanding this fact, it is considered that the policies contained within the Green Places Chapter is consistent with the Environment Bill

PfE 2021 Plan Wide Comments

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	Overall the plan lacks flexibility in terms of its approach to monitoring	It is considered that the statements in Chapters 1, 6, 7 and the monitoring framework in Chapter 12 provide an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. Therefore, no change is considered necessary
2	The PfE policies are not sufficiently aligned with other policies, in particular the level of housing growth is not sufficiently aligned with the economic ambition and the strategic transport plans. Therefore, overall the Plan lacks the level of development to match the growth ambitions and does not allocate land required to meet all housing, employment, infrastructure and community use needs across the respective nine authorities	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. We do not consider that exceptional circumstances exist to justify departure from the standard methodology. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.
3	Policies are vague, unclear and ambiguous and some unnecessarily duplicate NPPF	No change is considered necessary. The Plan is considered to provide an appropriate level of detail for a strategic plan of this nature, providing the necessary policy framework for district local plans. Where duplication of NPPF exists, it is considered appropriate/necessary and has been kept to a minimum. Therefore no changes is considered necessary as it is consistent with NPPF
4	Insufficient attention has been paid to the impact of Covid and Brexit. Consequently the overall housing and employment needs have been overstated and should be adjusted	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
5	The Plan should be modified as it does not fully address the requirements of Greater Manchester on the basis that Stockport is now excluded. Therefore, although it sets strategic level policies and allocations it does not complete the development plan policy framework across the conurbation or even the 9 relevant Local Planning Authorities	No change considered necessary. Following the decision made by Stockport Council in December 2021 the AGMA Executive Board 12.02.21 a considered the merits of continuing to produce a joint plan of the nine remaining GM districts. Following consideration of that report Members resolved to pursue a joint plan of the nine, which would enable the remaining districts to accommodate the development needs of the nine whilst aligning with wider Greater Manchester strategies for transport and other infrastructure investment. The impact that this decision has had on the approach to

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
		growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . As set out in paragraph 1.57, each district will continue to produce a local plan, thus completing the development plan policy framework for the districts
6	The Plan should be modified as it does not address detailed boundary changes that are best assessed at the Local Plan stage	No change necessary. Paragraph 1.57 makes it clear that the PfE Plan is a strategic spatial plan and each district will continue to produce a local plan. The scope of those local plans is correctly a matter for districts to determine. However, paragraph 11.5 makes it clear that it is the role of the PfE plan to identify those sites outside the urban area which are required to deliver our inclusive growth needs, thus ensuring that sufficient land is available within in the plan period.
7	There is no guarantee over delivery rates, there must be a strategy to guarantee delivery, given past poor delivery rates	No change is considered necessary. Chapter 12 provides an appropriate policy framework for the delivery of policies within the plan, consistent with NPPF. Additionally, Chapter 12 sets out a monitoring framework which provides an appropriate level of detail for a strategic plan. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated
8	There are no details in relation to partners or industries for the employment	No change is considered necessary. The employment policies in this plan and those allocations proposing new employment are considered to be consistent with NPPF and provide an appropriate level of detail given the strategic nature of the PfE Plan. Policy D1 provides details of strategic delivery partners, however, details in relation to site specific partners and/or industries will be a matter for consideration at the planning application stage, as appropriate
9	Overall the plan lacks flexibility in terms of the amount of land allocated and the approach to safeguarding land	No change necessary. As detailed in both the Employment Topic Paper [05.01.04] and the Housing Topic Paper [06.01.03] a margin of flexibility has been included in both the employment and housing land supply, which provides a margin of flexibility to ensure a sufficient choice of sites is available to meet the demand for employment land and to meet the identified housing needs. This land supply is considered to appropriately reflect the outcome of relevant evidence and will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that the Plan as a whole provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
10	Overall the plan lacks flexibility in its approach to Green Belt additions	No change is considered necessary. The approach to Green Belt additions is considered to be consistent with NPPF and reflects the evidence base provided. The exceptional circumstances case for the Green Belt additions can be found in the Green Belt Topic Paper [07.01.25] . Separate to this and consistent with NPPF Chapter 12 provides an appropriate monitoring framework for a strategic plan of this nature. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated
11	The Plan period should be reduced, it is not possible to predict what will happen in 15 to 20 years' time	No change is considered necessary. NPPF paragraph 22 makes it clear that strategic policies (such as those within PfE) should look ahead over a minimum 15 year period from adoption
12	The Plan period should be extended to ensure at least 15 years' coverage from adoption. Without this the Plan is contrary to NPPF paragraph 22. Currently the plan period runs from a base date of 2020 to 2037 but it is unlikely to be adopted in 2022. Without extending the plan period, the plan will lack sufficient flexibility in terms of the plan period	No change is considered necessary. Whilst the PfE Plan period evidence base covers 2020 to 2037, it is acknowledged that if the PfE Plan were to be adopted in 2023, it would provide 14 years' policy post adoption. However, it is considered very likely that when the land supply is updated from its 2020 base date, that sufficient land supply will exist to cover a minimum of 15 years from adoption. Separate to this, Chapter 12 provides an appropriate monitoring framework for a strategic plan of this nature. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated. It is considered that this approach provides sufficient flexibility
13	The requirement in NPPF, para 22, for at least a 30 year vision is relevant to PFE, particularly as some allocations include delivery beyond the plan period.	The Regulation 19 version of the PfE had already been published for approval by the individual districts at the time the NPPF was revised in July 2021. At that point in time no definition had been provided in NPPF or NPPG for the phrase "larger scale developments such as new settlements or significant extensions to existing villages and towns". Therefore, it was considered appropriate to proceed with the Regulation 19 consultation with a view to reviewing the position following the consultation, should guidance be published. NPPG was revised in October 2021 and clarifies that the new policy requirement in paragraph 22 applies "where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period." [NPPG Paragraph: 083 Reference ID: 61-083-20211004]. It is

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
		therefore considered that the PfE Plan has been prepared in accordance with the new element of NPPF paragraph 22 and no change is required to the Plan
14	Not enough emphasis has been placed on brownfield sites. These sites should be used before greenfield/Green Belt land is used. Without this approach, the overall plan will result in unsustainable development. A number of specific brownfield sites have been suggested for inclusion in district SHLAAs, including: the old fire and police stations and the old paper mill in Bury; Turner Brothers Factory, Rochdale	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . The Plan has also been subject to a full Sustainability Appraisal, full details of which can be found in the Strategic Environmental Assessment
15	The evidence base documents prepared are inconsistent with each other, they should apply consistent methodologies and be in compliance with national policy. For example, this applies to the preparation of the SHLAAs	No change is considered necessary. The evidence base is rightly wide ranging, given the scope of the PfE Plan. As such the evidence base covers a number of subject areas and therefore different methodologies are applied to different subject areas. However, the same methodology has been applied across the plan area for the same topic area.
16	The evidence base documents are not truly independent	No change is considered necessary. It is considered that a proportionate evidence base has been provided by industry expert and professionals to support the policy, it can be found here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
17	There is no attempt to link the 7 no. criteria in the site selection methodology with the vision or objectives of the PfE Plan or to the Integrated Assessment. The seven criteria are not sufficiently justified and appear to include arbitrary thresholds. As a result, the Areas of Search are clustered around existing public transport nodes, close to town centres and within or close to wards identified as being the most deprived in England. It is not clear how this relates to the wider challenge of addressing the major housing and economic challenges across the city region	The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts. The criteria reflect the approach to growth and spatial distribution as set out in the Growth and Spatial Options Paper [02.01.10] . The Options were subject to Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.02] .

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
		<p>The methodology was reviewed at each stage of the GMSF/PfE plan making process and the Site Selection documentation was updated to reflect any changes, as well as to take account of any new sites.</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology [03.04.08].</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
18	The Site Selection methodology lacks transparency, no details have been given as to what alternatives were considered, how sites were selected and/or why sites have been rejected. It has therefore not resulted in the most appropriate strategy	<p>Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Reasonable alternatives to the PfE allocations have been considered through the site selection methodology (see Section 6.44 – 6.47 of the Site Selection Background Paper (03.04.01)). The approach to site selection is considered to be robust in the Site Selection Background Paper. No changes to the PfE are considered necessary.</p>
19	The Site Selection methodology should have had more emphasis on the value of environmental sites. The approach has led to sites being selected which are in conflict with other parts of the plan, particularly the Greener Places Chapter	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the allocations are supported by an appropriate evidence base which addresses matters such as those in the representation. The allocations require development of the site to incorporate mitigation as appropriate.</p> <p>The Site Selection process is considered sound and no change is necessary</p>
20	Options where no Green Belt land is required to meet the needs of the nine districts should be subject to more detailed review, including increasing density of development on previously developed land. Until this has been done, it is not possible to conclude that all other options have been considered	<p>No change is considered necessary The Growth and Spatial Options Paper [02.01.10] considers reasonable options in terms of both growth and spatial. An assessment of these options has been carried out in what is considered to be an appropriate and consistent manner. The Housing Topic Paper [06.01.03] sets out the work the districts</p>

Summary of Main Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
		have done in terms of optimising the existing land supply. Notwithstanding this work and the fact that the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.
21	The Plan's evidence is contrary to the statement at paragraph 1.63 as it is based on out of date data, in particular the use of 2014 household data to identify the housing target	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.

PfE 2021 Suggested Omissions From the Plan

Row	Summary of main issues raised to PfE2021	Summary response to the main issues raised to PfE2021
1	Omission of reference to the rural economy including food production and acknowledging the countryside as a working environment	No change is considered necessary. Places for Jobs establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy and food production specifically as it is not envisaged that they will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 8) recognises the role that rural areas play across the PfE area, including the countryside as both a working environment and a place for recreation.
2	The plan as drafted does not explain what will happen if the level of development in the plan does not come forward as expected. The monitoring framework includes generic indicators which will not address the circumstances the PfE Plan seeks to address. Instead the Plan should set out clear triggers for a Plan review and the timescale for review	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. Additionally, chapters 1, 6 and 7 all make it clear that consideration will be given to the for a formal review outside of the statutory process, if the monitoring results indicate it is necessary
3	The plan fails to include any meaningful mental health impact on the residents	No change is considered necessary. A Health Impact Assessment was carried out as part of the Strategic Environmental Assessment .
4	A Grasslands Policy should be included in the Plan. There are significant existing grassland assets (many of which are designated as SBI's) and opportunities for grassland creation across GM. The grassland actions and measures included in the GM LNRS could be used to develop the clauses within this new 'Grassland' policy.	No change is considered necessary. Greener Places is considered to be consistent with NPPF and provides an appropriate strategy for our natural environment, including areas which are SBIs and grasslands
5	The indicators in relation to the historic environment are incorrect and/or insufficient, particularly in relation to buildings on the "at risk register" and the coverage of the Historic Environment Record within the Places for Everyone plan area	Disagree, no change is considered necessary. The indicator in relation to the buildings on the "at risk register" seeks to increase the number of those buildings, which remain on the at-risk register, with a strategy for repair reduce. It is considered that as drafted in PfE, the indicator would have a more positive impact on these sorts of buildings. Furthermore, it is considered that the monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan

PfE 2021 – Other Issues

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
1	Para 9.20 It is noted in the supporting text that whilst Middlebrook is significant in terms of its size and function, it is not a designated centre and will continue to be treated as out-of-centre. It is not appropriate to include this text and that relating to the Trafford Centre in the PfE. The last sentence of paragraph 9.20 should be removed	It is considered that paragraph 9.20 provides appropriate context for Policy JP-4, in that it correctly clarifies the status of these retail facilities. Therefore, no changes are considered necessary	Orbit Developments (Manchester) Ltd

Supporting Evidence

A summary of the issues raised in relation to the Supporting Evidence within PfE 2021 (General Planning, Consultation and Evidence; Duty to Co-operate; Economy; Housing; Green Issues; Green Belt; Integrated Assessment; Infrastructure; Viability; Site Selection; Alternative Sites; Locality Assessments; Transport; Impact Assessment; Flood and Call for Sites), and the relevant respondents to PfE 2021 is set out below.

1. General Planning, Consultation and Evidence

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1.1	I can't find any reason to believe that the documents are not legally compliant.	Support noted.
1.2	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.	Sections 2 and 3, together with Appendix 1 of the report to the Places for Everyone Joint Committee, 20/07/2021 sets out the extent/nature of the changes, further details on the changes from GMSF to PfE2021 were also made available in the supporting documents. Having considered this evidence, the Committee resolved that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020). As such the provisions of S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply to the Plan. Therefore, the progression of the PfE Plan to Publication is considered in accordance with the relevant provisions of the Act and Regulations.
1.3	A change in the methodology for Manchester City Council was resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed .This represents a significant change between the previous spatial framework the GMSF and the current joint development plan PfE.	As Row 1.2 above
1.4	The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.	It is considered that a proportionate evidence base has been provided to support the policy, it can be found here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1.5	The Plan is out of date as the world has changed as a result of covid with greater numbers of people will be working from home and there is increased demand for better green space and leisure.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
1.6	Based on outdated statistics and lack of public consultation. The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
1.7	Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no notification to residents of the initial call for sites and the amount spent on making residents aware of the plan is disproportionately small in comparison to the effect it will have upon them.	The Regulation 22 Statement of Consultation, including individual compliance statements for each of the nine districts, provides details of the consultation / engagement including the early stages of the GMSF. These documents demonstrate that the consultation met the requirements of the relevant regulations.
1.8	The consultation format is too long and complicated for ordinary individuals to comprehend and make a considered detailed response. The process appears to be set up for experts. I have no political axe to grind but parties of all persuasions repeat the mantra of "growth". It must be obvious that infinite growth is neither possible, nor desirable, nor deliverable. Surely the plan fails this test of soundness.	It is acknowledged that the Regulation 19 version of the Plan is accompanied by a large amount of supporting documentation however, a number of steps were taken to assist readers in understanding the material. This included topic papers explaining the technical evidence base, which were provided on the Supporting Documents page of the GMCA website. Additionally the Consultation 2021 pages on the GMCA website had explanatory information about the consultation, including FAQs and how to make an effective representation and in anticipation of continued restrictions arising from the pandemic, the PfE districts also developed a virtual exhibition space .

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		The approach to growth is set out in the Growth and Spatial Options Paper [02.01.07]
1.9	Lack of consultation with local community. Most of the local community, and especially those who do not have access to or accounts on social media sites, appear to be completely ignorant of the new plans. I have not yet met one person locally that was fully informed about the plan, aware of its impact on the green belt and is in favour of it going ahead – the council has not met its obligation of informing and consulting with the local community.	See Row 1.6
1.10	Consultation not carried out as agreed, there was no contact by email, those next to proposed development have not been consulted. You have relied on social media. The questions asked are to illicit the responses you want.	See Row 1.6
1.11	No clear consultation undertaken and document is too long.	See Row 1.6
1.12	There has been a lack of consultation and explanation of how development proposed will impact on residents lives.	See Row 1.6 and Row 1.7
1.13	Overall, the consultation and engagement with residents has been very poor, particularly prior to the 2020 documentation release.	See Row 1.6
1.14	Assessments have not been undertaken independently. Ecological assessments have been developer led/funded with potential for bias. For example, wildlife, flood risk and other surveys of the Walshaw site have been carried out by consultancies directed and paid for by developers. Similarly, Arc4 undertook the Housing Need Assessment for Bury/Walshaw. Whilst the report was reported as a non-biased assessment of housing need, the fact that ARC4 work in partnership with Greater Manchester Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury the report cannot be considered impartial.	It is considered that a proportionate evidence base has been provided by industry expert and professionals to support the policy, it can be found here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
1.15	There is inconsistency in the evidence base across sites and between the 9 Districts. A consistent methodological approach needs to be adopted for all sites and for example across District's SHLAA.	PfE is a Joint DPD. Each district is responsible for preparing their own SHLAA. Information from the SHLAA's is collated and the housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] .
1.16	There has been inaccurate and misleading information produced throughout the Plan's development. The Plan is unsound and flawed. It will take away our Green Belt, damage our towns and villages and negatively affect the wealth and wellbeing of our valuable communities forever.	It is not clear what has been inaccurate or misleading. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]
1.17	How much has it cost to get to this stage? It is an unrealistic plan that sounds good on paper but could turn into a nightmare and could cost multi millions to implement.	Out of scope
1.18	How much has this cost the tax payer already? Bury will be a congested hell hole with no wildlife, and the only way to get to any green spaces will be either by car or using what will be slow public transport. It has the 2nd highest level of noise and pollution from road and rail in the UK, just missed being No 1 with a score of 95.4/100. Noise pollution can disrupt sleep, increase irritability and decrease cognitive performance. These figures are before proposed roads and rail have been implemented. More overload on hospitals, doctors and mental health etc.	Cost is out of scope. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . Transport Locality Assessments and Addendums [09.01.07 - 09.01.28] GMSF2020 provide detailed information on the nature, scale and timing of infrastructure requirements at the Strategic Road Network in respect of the site allocations. Policy JP-P5 provides the strategic policy framework to address health facilities and individual allocation policies address this as appropriate.
1.19	Bury Council are being deliberately short sighted in their plans. They will not improve life, air quality, road congestion or general living standards for any of the residents in the areas targeted. It is truly appalling.	It is considered that PfE provide a long-term framework for sustainable growth. Chapter 4 summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas.
1.20	You have deliberately made this consultation as difficult as possible for anyone to understand and complete and have failed to take into account people with learning disabilities, elderly or people who do not have English as their first language.	See Row 1.7
1.21	Lack of public consultation - the only hardcopy communication I've seen in relation to the detailed proposal and deadline of 3rd Oct 2021 was contained in a flyer posted through my letterbox on 30th Sept 2021.	See Row 1.6
1.22	Much of the "evidence" has been brought forward from previous iterations of the GMSF & hasn't been updated. The entire evidence base is inconsistent, with policies and calculations spanning differing time periods. Much of the evidence for site allocations e.g. geo-environmental assessments, historical assessments, has been prepared by, or funded by development companies who have a direct conflict of interest.	The PfE plan utilised the GMSF 2020 evidence base. This has been updated where appropriate It is considered that a proportionate evidence base has been provided to support the plan and this can be found here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
1.23	There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.	See Row 1.6 and 1.7
1.24	Try listening to what local people want to see in their local areas before revising your plans as local people are opposed to the manner in which your great ideas will be achieved.	See Row 1.6
1.25	An Inconsistent Evidence Base – to be justified the evidence base underpinning the Plan needs to be consistent. For instance, no standard methodology is applied to the SHLAA and the justification and evidence base documents to demonstrate the developability of the strategic allocations varies considerably.	See Row 1.14
1.26	To be positively prepared further evidence is required on the agreement between Stockport's and the 9 authorities. At present this is lacking and there are a number of uncertainties that need to be addressed confirming the agreement on unmet need once Stockport progresses its plan	It is not considered reasonable to delay the preparation of PfE until the Stockport Local Plan and its evidence are further progressed. Instead, the Statement of Common Ground submitted with the Submission documentation makes it clear that the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester which respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.
1.27	This consultation does not include areas of green belt that developers want the coding changed, so that it can be developed upon. More transparency for areas and intended land use would also be useful in this consultation.	It is not clear what this comment relates to. The proposals in the plan result in a new Green Belt boundary in the plan area. This is shown on the Policies Map.
1.28	Whatever the public say you are not listening to us, bullying and bulldozing our environment without thought for financial gain. We don't need or want to be included in the places for people. We want to be heard not ignored.	See Row 1.6
1.29	It is considered the absence of a Greater Manchester wide sports evidence base is contrary to paragraph 98 of the NPPF. There are no topic papers for Health, Physical Activity and Sport that brings together available local assessments and information, which means there is no evidence to inform and underpin relevant health, physical activity, and sport related PfE policies.	PfE is a strategic plan. Local plans will provide more detailed proposals linked to a local evidence base.

2. Duty to Co-operate

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
2.1	The duty to cooperate should include a proper consultation. Given that our feedback was totally ignored last time, I fully expect that to be the case again, which I believe is both uncooperative and possibly breaks consultation legislation.	Duty to co-operate is a legal obligation under S33A of the Planning & Compulsory Purchase Act 2004 as amended. The list of organisations that the PfE districts need to co-operate with is detailed in the Statement of Common Ground, published alongside the PfE2021 in Section One of the supporting documents list. Separate to this, the individual districts are required to carry out engagement in line with their individual Statements of Community Involvement. The Regulation 22 Consultation Document details the districts' compliance with these statements. It is considered that the PfE districts have met their obligations in respect of both matters and no change is needed
2.2	There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan.	As detailed in Section One of the supporting documents list (Duty to Co-operate) a Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021. These documents have since been updated to reflect the ongoing engagement with our neighbouring authorities and duty to co-operate bodies. It is considered that these documents demonstrate effective and on-going collaboration in line with NPPF
2.3	The Statement of Common Ground raises serious concerns that the Plan is going ahead at this stage without sufficient clarity on the Duty to Cooperate with Stockport Council and the resulting impact on the robustness of the Plan. This is also contrary to NPPF guidance on securing cooperation and clarity about cross boundary issues. The Statement of Common Ground appears to suggest that the remaining 9 authorities may be willing to accommodate some of Stockport's housing and employment land needs within the Plan, but that the level of that need is as yet unspecified. It would also appear to indicate that, in reality, Stockport Council remains within the Plan area in all but name. We would assert that this means the Plan is not yet ready for consultation as Stockport's needs and their associated impacts have not been suitably considered.	A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in Section One of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate Stockport. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date in terms of employment and housing, respectively. As explained in that document, Stockport MBC has been unable to provide evidence demonstrating unmet need. In the light of this, the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone
2.4	The PfE Plan should clarify the relationship of this Joint Plan to Stockport's local plan, and whether there is an expectation on the part of the Metro Mayor that Stockport will accommodate its housing requirement within its own administrative area, to the same timeframe of the PfE 2021 Plan.	The Duty to Co-operate Statement, Log of Collaboration and Statement of Common Ground in submitted with the Submission documentation detail the co-operation with Stockport to date and the fact that the PfE districts are seeking to agree a process for future engagement

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester
2.5	It is clear that a Duty to Co-operate Statement is required between Stockport and the other 9 Greater Manchester authorities ahead of both plans progressing any further. Failure to cooperate with the other 9 authorities could result in the Joint Plan and/or Stockport Plan failing to pass the legal requirement on the Duty to Cooperate.	The Duty to Co-operate Statement, Log of Collaboration and Statement of Common Ground in submitted with the Submission documentation detail the co-operation with Stockport to date and the fact that the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester

3. Economic

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
3.1	The Covid pandemic along with BREXIT mean a re-evaluation of GM's needs is essential.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
3.2	Soundness -the Plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns. Also, there are no partners or industries identified for employment provision. Major partners for employment provision should be identified.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		At this stage in the process, it is unrealistic to expect potential employers/businesses to be identified for sites proposed for employment.

4. Housing

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
4.1	The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. In Rochdale, the LHN is 8,048 and there is land available for 7,997 houses with no release of Green Belt. Rochdale Council are seeking approval for 7,000 houses on sustainable, brownfield sites around local stations. This, alongside planning permission already granted for 1,000 homes in South Heywood should supply nearly all the housing requirements for the next 16 years. However, Rochdale are seeking to release enough Green Belt / greenfield land to build an additional 4,000 houses. There is no justification for this release. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment, and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] It is considered that a proportionate evidence base has been provided to support the policy, it can be found here: details of the housing land need and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
4.2	The Land Supply evidence base is inaccurate and severely lacking, there is a distinct lack of focus on urban first land allocations, the plan does not promote the regeneration of the urban areas of GM and will not be effective at protecting future Green Belt release across GM. As the plan is not currently based on a robust and justified evidence base it is therefore unsound.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
4.3	The review of the GMSF (2019) evidence base suggests that there are some weaknesses and a need for further work on the evidence relating to:	It is considered that the Strategic Housing Market Assessment [06.01.02] provides an appropriate evidence framework to support PfE

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>Housing Market Area</p> <p>Local Housing Need Methodology</p> <p>Economic Growth</p> <p>Affordability</p> <p>Appropriate Housing Need for Greater Manchester.</p>	
4.4	<p>The government figures for the housing required in Greater Manchester need to be challenged in light of the turbulence of the last few years - Brexit/Covid being the two main issues. Once the numbers are agreed upon the plan needs to be re-assessed to ensure that brownfield sites are used first, and green spaces are used as an absolutely last resort. To facilitate this any brownfield sites should be developed first, and other potential brownfield sites monitored to see if they become available for use before any green space is developed and lost forever, with the inevitable impact on the environment and biodiversity of the area.</p>	<p>As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p>
4.5	<p>Given Stockport's significant delay in preparing its Local Plan, the removal of Stockport LHN requirements from the PfE presents a real risk to the availability and choice of sites to deliver much needed housing which are now being removed from the Plan.</p> <p>The publication draft of the PfE is not ambitious and will not make the significant contribution that is needed to reduce affordable housing need and provide much needed housing across Greater Manchester. It is our firm view this Plan could be more ambitious in its housing</p>	<p>A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in Section One of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate Stockport. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	growth and it does not seek to maximise the opportunity for economic and social development across the boroughs.	in terms of employment and housing, respectively. As explained in that document, Stockport MBC has been unable to provide evidence demonstrating unmet need. In the light of this, the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone
4.6	The housing need survey was carried out by Arc4 who are not independent because they have a partnership with Greater Manchester Housing partnership.	It is considered that a proportionate evidence base has been provided to support the plan provided by industry expert and professionals.
4.7	The Housing Land Supply position in Bolton is not robust and there is no available evidence to suggest that completion rates are going to increase to any significant degree in the absence of additional land outside of the urban area being allocated for housing. Therefore, Policy JP-H 1 is not supported by justifiable evidence in respect of Bolton, nor has it been prepared in a positive manner.	PfE is a Joint DPD. Each district is responsible for preparing their own SHLAA. Information from the SHLAA's is collated and the housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] . It is considered that a proportionate evidence base has been provided to support the plan and this can be found here: Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)
4.8	There are serious concerns in relation to a significant proportion of the supply from the majority sites in Manchester, Salford and Trafford, but is also concerned about approach being taken towards windfall sites. And from student accommodation. The standard method for calculating housing need makes no allowance for student housing in its calculation methodology as the 2014-based household projections explicitly strips out residents living in institutions (e.g. care homes, prisons and student accommodations). Without the PfE providing the evidence to demonstrate that the student accommodation in the pipeline is freeing up houses into the wider market, we consider that student accommodation needs to be removed from the claimed supply.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] . Student accommodation provides additions to the housing stock and is therefore identified within the district SHLAAs where such sites are available, suitable and achievable as required by the NPPF. The approach to including student accommodation within SHLAAs is consistent with the July 2021 housing flows reconciliation guidance published by MHCLG, and the housing delivery test measurement rule book published by MHCLG in July 2018 The Greater Manchester Strategic Housing Assessment [06.01.02] Chapter 6 provides information on the future need for care facilities and student accommodation. As stated in Policy JP-H3 housing provision to accommodate students will be addressed through district local plans.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
4.9	<p>There are further concerns in relation to viability and the ability for the plan to deliver the number of dwellings including affordable dwellings envisaged.</p> <p>From this analysis, at least 14,937 dwellings need to be removed immediately from the claimed supply. The actual number of dwellings which is considered to be undevelopable is likely to be significantly higher as the analysis undertaken is only a proportion of the supply. This demonstrates the magnitude of the issues associated with the claimed supply contained within the PfE.</p>	<p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>
4.10	<p>The PfE housing land supply has been derived, not based on evidence of what is needed, but purely on maximising and exaggerating the claimed capacity of every available site in the urban area regardless of its deliverability or viability. The prerogative of the plan appears to be reducing the proportion of Green Belt release required regardless of the evidence for what is needed.</p> <p>Coupled with that, no account has been given of the market's ability to absorb the proposed level of apartment type developments or of what the future need is likely to be.</p>	<p>No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p>
4.11	<p>The Plan needs to identify additional sites, most likely from the Green Belt, to meet the future housing needs as well as identifying suitable and sustainable Safeguarded sites to meet needs beyond the plan period or in the event that the Council's claimed supply fails to materialise.</p>	<p>A 16% margin of flexibility has been identified in the housing land supply see Housing Topic Paper [06.01.03]. Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the identified housing needs, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that the policies in the plan (Policy JP- H1, Allocation policies) provide an appropriate policy framework to ensure long-term land supply, consistent with NPPF</p>
4.12	<p>The SHMA explains that the estimated net annual affordable housing requirement in Manchester is 1,840 dwellings. This need will clearly not be addressed by Manchester's housing supply. Table 7.15 of the SHMA states that the committed supply of affordable housing in Manchester at 01 April 2021 is just 491 dwellings. This is because the supply is dominated by 1 and 2 bedroomed apartment schemes, the vast majority of which will not deliver any affordable homes.</p>	<p>The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future. The delivery of at least 50,000 affordable dwellings is considered to be an ambitious target for all of Greater Manchester which features in the GM Housing Strategy</p>

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	<p>The over-reliance on apartment schemes means that if the market changes the approach is not sufficiently flexible to adapt to rapid change as it needs to be as set out in paragraph 11a) of the NPPF. The supply both within the five year period and beyond to 2037 will not address the need for open market and affordable houses across the City of Manchester.</p>	<p>– though it is not a ceiling on delivery. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, and can be achieved via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>For further information, the Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the affordable housing requirement in Greater Manchester.</p>
4.13	<p>The Plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and the impact of Covid on work patterns.</p>	<p>As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.</p>
4.14	<p>Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets.</p>	<p>Policy JP-H1 states that each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. This point is further clarified in the Housing Topic Paper [06.01.03] at para. 6.18, where it states that each district will be assessed individually for the Housing Delivery Test and Five Year Supply.</p>
4.15	<p>Whilst the more balanced approach to meeting the housing requirement in Bury is to be welcomed, there are still real doubts over whether the sites identified within the housing land supply within the existing urban area will deliver as anticipated and therefore whether this is a robust basis from which to base decisions about the quantum of Green Belt release required to meet Bury's housing needs.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>There seems a real risk that a strategy which relies so heavily on brownfield sites will fail to deliver enough of the type of dwellings required in the type of locations required. Concerns are that the proposed strategy will not deliver sufficient levels of affordable dwellings to cater to the clear unmet need. The displacement of 25% of Bury's housing requirement to neighbouring Districts further exacerbates this issue.</p> <p>The PfE Joint DPD should be taking the opportunity to release additional smaller, immediate deliverable sites from the Green Belt in order to ensure an immediate and steady supply of housing land over the plan period, helping to meet market and affordable housing needs in full during the plan period.</p>	<p>Housing Topic Paper[06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p>
4.16	<p>There are a number of issues with the Housing Market Area evidence base. Whilst an updated Strategic Housing Market Assessment (Update April 2021), has been prepared this does not adequately address these concerns. It clearly still demonstrates very limited movement between southern and northern boroughs. On this basis, there is no clear justification that the boroughs act as a single functional housing market, nor is it clear that the associated distribution of growth will result in meeting the overall spatial strategy. As such the proposed spatial strategy is not justified nor effective.</p>	<p>It is considered that Chapter 2 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] 'Defining the Housing Market Area' provides a proportionate evidence base to support the spatial strategy in the Plan as set out in Chapter 4.</p>
4.17	<p>GMCA has grounds to argue that it should not follow the standard Housing Need Methodology but instead apply one of its own, more appropriate to the characteristics of the GM population.</p> <p>We submit that the housing need projections are manifestly implausible. We acknowledge that this is a result of using the government's recommended methodology. We propose a recalculation of housing need based on plausible occupancy and population growth figures.</p>	<p>As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.</p>
4.18	<p>The Housing Topic Paper, Appendix - "Housing Land Supply Statement" provides further detail on the claimed land supply for GM. The limited content falls well short of comprising what is defined as a Strategic Housing Land Availability Assessment (SHLAA) within national policy and guidance. The available information is completely inadequate to justify the claimed contribution of urban supply to meet GM's housing needs. The housing strategy is therefore neither justified nor effective.</p>	<p>The PfE is a joint plan of the 9 authorities. Each local authority is responsible for producing a SHLAA which have informed the housing land supply position underpinning the plan. This is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01].</p>
4.19	<p>The PfE 2021 assumes that Greater Manchester operates as a single Housing Market Area [HMA]. This provides part of the justification for redistributing the overall housing target</p>	<p>No change necessary, it is considered that the Greater Manchester Strategic Housing Market Assessment [06.01.02] defines the housing market area in accordance with national</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	across the city region and for some authorities to meet. The 2021 SHMA does not undertake the required level of assessment and the approach taken to conclude that Greater Manchester is a singular HMA is flawed and ill-conceived. A revised SHMA is required which aligns with the requirements of the PPG and defines more appropriate housing market areas in Greater Manchester. Following the production of a revised SHMA, a re-evaluation of the distribution of the housing requirement may be required which takes account of the new housing market areas.	guidance. Therefore, its conclusion that Greater Manchester can be defined as a single housing market for planning purposes, is reasonable
4.20	There are concerns related to a number of assumptions that underpin the GM housing land supply and Wigan housing land supply which lead to the need for further Green Belt release, including land at Upholland Road, Orrell.	No change necessary. The PfE is a joint plan of the 9 authorities. Each local authority is responsible for producing a SHLAA which have informed the housing land supply position underpinning the plan. This is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] .
4.21	Numbers of houses required in the region was calculated prior to Brexit, and post-brexit, so there is an argument that the number of people estimated to need houses will be reduced as a direct result of EU nationals leaving. Surely, caution in estimating housing requirements should be exercised, especially when contemplating building on the Green Belt to meet housing needs that are in dispute.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .

5. Green Issues

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
5.1	The HRA Appropriate Assessment is incomplete because both the scale of the impacts and mitigation required to deal with any impacts are unknown, as such the plan is unsound in relation the 'effective' and 'legal compliance' tests. In this respect, further work is required to assess air quality impacts on the Manchester Mosses SAC and assess recreational disturbance on the Peak District Moors (South Pennine Moors Phase 1) Special Protected Area (SPA)/South Pennine Moors Phase 2 SPA, including any in-combination effects. The	An updated Habitat Regulation Assessment (HRA) (11.02.01) has been completed to support the Submission PfE which seeks to resolve the issue raised. Also, the Statement of Common Ground No.8 (01.01.02) with Natural England, indicates that the GMCA is committed to continuing to work collaboratively with Natural England on an ongoing basis to assess the impact of PfE on European Protected sites and species, including any mitigation measures that might be required.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>recommended mitigation measures in the HRA need strengthening and justifying and the site allocation policies in the Plan need to reflect them. The commitment to develop a Visitor Management Strategy for the South Pennines is supported but needs more detail.</p> <p>Natural England will continue to work with Greater Manchester Combined Authority (GMCA) and their appointed consultants as they work towards addressing the issues raised in this response.</p> <p>Natural England raised other concerns on the HRA about water pollution, asking if United Utilities could confirm that there is sufficient capacity in the drainage network to accommodate the growth planned through the PfE with regards to impacts on the Mersey Estuary SPA.</p> <p>Natural England has no outstanding concerns regarding Functionally Linked Land.</p>	
5.2	<p>With all your to protect - nature, outdoor green areas, flood lands, woodlands, promoting exercise, mental health and which Beal Valley has all of these so why is it amongst your proposals?</p>	<p>The PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at JPA 12 Beal Valley as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum.</p> <p>Allocation Policy JPA 12 Beal Valley includes safeguards to ensure that development will: deliver a multi-functional greenspace network (Part 8 of the policy); deliver a large green wedge as part of the multi-functional green infrastructure network (Part 11); retain and enhance biodiversity habitats on site (Parts 12 – 14); deliver sports and recreation facilities (Part 15); and protect development from flood risk and make space for flood storage on site (Parts 19 and 20). The Beal Valley Allocation Topic Paper provides further information.</p> <p>No changes to the plan are required.</p>
5.3	<p>As explained in detail, the plan assumes availability of supply or minerals and mineral products. The plan is relying upon outdated policies and has failed to give consideration to the existing and proven shortfall of consented reserves not solely in the GM area but the wider NW region. This is clearly evident in the LAAS and NAWP annual reports. A review</p>	<p>Paragraph 5.52 of the supporting text indicates that annual monitoring of minerals extraction and changes in likely future needs will inform whether and when an update of the joint minerals plan is required, including as a result of the growth in development set out in this plan.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	of the GM Minerals plan should be run in parallel and a clear and concise resource assessment and supply audit undertaken to ensure the plan's aspirations can be delivered.	<p>Statement of Common Ground No.2 (01.01.02) indicates that</p> <p>The PfE districts will collaborate with adjoining neighbouring districts and other areas with which there are significant minerals and waste movements, on any revision to the Greater Manchester Joint Minerals Plan and any revision to the Greater Manchester Joint Waste Development Plan. Further consideration of this issue will follow the Submission stage of the PfE.</p> <p>Therefore no changes to the PfE are considered necessary.</p>
5.4	There has to have been a thorough and independent ecological assessment, for example by independent wildlife organisations	<p>It is considered that a proportionate evidence base on ecological matters has been provided to support the plan, including a Habitat Regulation Assessment (02.02.01) and ecological evidence to support the allocations outlined in the allocation topic papers.</p> <p>no changes to the PfE are considered necessary.</p>
5.5	It is unsound to use green belt for any development, especially when "green spaces" are planned. Plan "green spaces" and leave the green belt as it is. It is contradictory to plan cycle routes and then expand the airport. The airport has already taken over enough green spaces.	<p>It is considered that a proportionate evidence base on the release of Green Belt (07.01.04 – 07.01.25) for development has been provided to support the plan.</p> <p>PfE Policy JP-G2 Green Infrastructure Network seeks to protect and enhance green spaces.</p> <p>PfE Policy JP-Strat 10 Manchester Airport deals seeks to maximise benefits of the operation and growth of the airport. Paragraphs 4.66 – 4.96 of the supporting text to the policy outlines the justifications for the policy. The policy is not considered to be contrary to Policy JP-C1 An Integrated Network which seeks to increase walking and cycling, as the plan should be read as a whole.</p> <p>No changes to PfE are considered necessary.</p>
5.6	The site is greenfield and on the boundary of ancient woodland. The topic paper indicates that there are no known ecological constraints which are so important as to preclude the allocation of the site, although mitigation or compensation will be required. However, the site	Parts 20 and 21 of PfE Policy JPA 32 South of Hyde indicates that the SBI, ancient woodland and other ecological features on site will be protected and enhanced.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	includes a Site of Biological Importance, is adjacent to a nature reserve and ancient woodland, and a number of protected species and potential specially-protected priority species have been identified.	No changes to the policy are considered necessary.
5.7	<p>It is unacceptable to build on our moss for a number of reasons. One reason is the global impact this will have because breaking into peat on the moss will release Carbon dioxide creating greenhouse gases which will lead to the increase in global warming. Building on Cadishead moss will also damage people's health due to no quiet places left to go that is (without traffic) which will affect mental health and traffic fumes can lead to lung illnesses. The moss lands of Irlam, Cadishead and Barton is a major contributor to the removal of CO2 emissions as it is a green lung.</p> <p>The Greenbelt area should remain agricultural land to grow fruit, vegetables and crops as we have left the EU and need to grow independently so that we can have food security for the future.</p> <p>Our moss is home to a variety of rare birds, plants and animals because of its bio-diverse ecosystem especially ground nesting birds such as lapwings. Building on this specialised habitat will lose these animals and birds for ever.</p>	<p>Paragraph 4.7 of the North of Irlam Station allocation Topic Paper [10.07.70] outlines the reasons for developing on peat and agricultural land. Policy JPA-28 North of Irlam Station outlines the mitigation measures in relation to carbon, including managing the carbon implications of development being central to the masterplan that needs to be prepared for the site (part 1) and minimising the loss of the carbon function of the peat (part 5).</p> <p>Part 10 of Policy JPA-28 seeks to provide high levels on green infrastructure on the site. Parts 10, 11, 12 and 13 of Policy JPA-28 seek to protect and enhance biodiversity on site.</p> <p>No changes to the PfE are considered necessary.</p>

6. Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6.1	The evidence base to support the case for 'Exceptional Circumstances' to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.	<p>It is considered that a proportionate evidence base has been provided to support the release of Green Belt, including the Stage 1 Green Belt Assessment [07.01.04] and Stage 2 Green Belt Assessment [07.01.07].</p> <p>Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6.2	<p>Sites in the Green Belt were allocated in accordance with seven Site Selection Criteria. Re Criteria 7, while some of its aims are sensible, it is highly questionable that they constitute 'exceptional circumstances' to take land out of the Green Belt in the case of sites that do not support any of the plan's strategic objectives. Of the 18 allocations that satisfy Criterion 7, five do not satisfy any other Site Selection Criteria: JPA9; JPA17; JPA19; JPA27; and JPA32. Most of the local benefits outlined under Criterion 7 may be localized in their impact, but they are not localized in their characteristics. No strategic exceptional case and no local exceptional case has been evidence or justified for allocation JPA19, hence the plan is unsound. JPA19 should be removed from the PfE and all allocations that are solely included under criteria 7 should also be removed.</p>	<p>Given the lack of sufficient land to meet development needs, the evidence base supporting the plan (see Green Belt Topic Paper [07.01.25]) concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development.</p> <p>It is considered that a proportionate evidence base has been provided to support the release of Green Belt and that appropriate site selection criteria have been applied.</p> <p>Section 14 of the JPA19 Allocation Topic Paper [10.06.35] sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release. Similarly, topic papers linked to other site allocations demonstrate the exceptional circumstances that justify their release.</p>
6.3	<p>No robust objective evidence has been put forward as to why the buffer of close to 16% is required, nor why it is essential, nor what the flexibility issues are in the existing supply. The buffer calculation is spurious, illogical and circular.</p>	<p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>
6.4	<p>Green Belt Assessment 2016 should be updated to ensure that sites are correctly assessed in the interests of effective plan making.</p>	<p>No change considered necessary. The approach in relation to Green Belt Assessment is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for how sites have been assessed in line with effective plan making.</p>
6.5	<p>There was no attempt to engage with the Green Belt Assessments carried out by LUC and no response to the requirements of the Framework in terms of amending Green Belt boundaries e.g. the need for boundaries to be clearly defined using physical features that are readily recognisable and likely to be permanent.</p>	<p>No change considered necessary. The approach in relation to Green Belt Assessment is considered consistent with NPPF, including its approach to defining boundaries. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for where boundaries have been redrawn.</p>
6.6	<p>There are concerns with the GM Green Belt Assessment 2016 and its appendices. There is objection to the fact that as part of the Green Belt Assessment 2016 Cox Green was not properly considered as it was grouped together and assessed as a larger parcel of green belt land. Therefore, the decision taken previously to not release this site from the green belt was not based on a robust assessment of how the site performs against the purposes of the green belt.</p>	<p>No change considered necessary. The approach in relation to Green Belt Assessment is considered consistent with NPPF as set out in the Green Belt Topic Paper [07.01.25]. Sufficient land has been identified to meet the housing and employment needs of the Plan on other more suitable and sustainably located sites in the region.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6.7	The Stage 2 Green Belt Study has been prepared following the site selection process and therefore the evidence has been prepared to fit the sites already selected for Green Belt release, rather than actually helping inform which sites could be released from Green Belt without causing significant harm to Green Belt purposes, or allowing that to form part of the site selection process. As such, it is clear that the Plan, including previous iterations of the GMSF version of the plan, have been progressed without a robust and appropriate evidence in respect of the impact on the Green Belt. This is further compounded by the Green Belt Study, and its multitude of addendums, solely considering the impact of the planned Green Belt release sites and not considering any other sites or potential sites which could have a lesser impact on Green Belt purposes than the identified draft allocations. As such, the evidence in relation to the Green Belt release cannot be considered sound or a proportionate evidence base to support the plan.	<p>It is considered that a proportionate evidence base has been provided to support the proposed Green Belt release. The Stage 2 Green Belt Study [07.01.07] provides a detailed assessment of the 'harm' to the Green belt purposes that would result from the proposed development allocations; this approach is considered consistent with NPPF (as set out in the Green Belt Topic Paper [07.01.25]) and therefore no change is considered necessary.</p> <p>Further, alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic Paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p>
6.8	There are concerns with the GM Green Belt Assessment 2016 and its appendices and in particular to the assessment of Parcel WG018 in Appendix 4.11. Changes are required to the ratings for Purposes 1a, 1b, 2, 3, and 4 to make the evidence base sound, robust and justified.	See response to Row 6 above.
6.9	There are concerns with the GM Green Belt Assessment 2016 and its appendices. The release of site GM1.3 from the Green Belt would not compromise the purposes of the Green Belt outlined in the NPPF.	See response to Row 6 above.
6.10	There are concerns with the GM Green Belt Assessment 2016 and its appendices in relation to the Leyland Green Road site and in particular to the assessment of Parcel WG097 in Appendix 4.11. Changes are required to the ratings for Purposes 1a, 1b, 2, 3, and 4 to make the evidence base sound, robust and justified.	See response to Row 6 above.
6.11	The proposed house building is primarily on green belt land and completely unjustified.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
6.12	The Land North of Junction 8 M60 serves no more than a 'weak' contribution to any of the purposes of the Green Belt. As such further consideration should be given to the allocation of this additional Green Belt site, given its excellent sustainability credentials and ability to act as a logical infill site for Stretford.	See response to Row 6 above.
6.13	There are not enough green spaces as it is. No green belt should be used for housing or other development in any of the areas in Greater Manchester. It should be a priority that all existing green belt be preserved. The proposed additional green belt is tiny. People need homes and infrastructure but not at the expense of green spaces where brownfield sites are available.	See response to Row 11 above.
6.14	The proposed greenbelt additions (on the interactive map) shows that all this area is already greenbelt when clearly it is not. Therefore, your map holds incorrect information.	The policies map displays proposed Green Belt boundaries inclusive of proposed Green Belt additions, not that these areas are already Green Belt. All Green Belt additions are within areas not currently designated as Green Belt.
6.15	The site at Templecombe Drive, Sharples, Bolton falls within an area of land included within the Green Belt Assessment's parcel BT05. There are concerns over the accuracy and findings of the Green Belt Assessment for this land parcel.	See response to Row 6 above.

7. Integrated Assessment

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
7.1	<p>The Integrated Assessment Report is not Positively Prepared and requires updating to include the Climate Emergency Action Plans and Carbon Neutral Action Plans for each of the 9 districts, together with those of the Health Authorities and the GMCA. The Assessment Criteria should be updated to reflect those Action Plans and the Plan should be assessed against these revised criteria. Without inputs from these reports, we believe there are gaps in the key sustainability issues identified.</p> <p>There are gaps and inaccuracies in the identified issues and the Objectives/Assessment Criteria should be reviewed and updated, along with the evidence-base and the Plan should be assessed against these revised criteria, including the addition of an Objective to protect GM's Green Belt Land.</p>	<p>Section 5.1.4 (p209), Section 1.5.2 (p15) and Section 7 (p224) of the Integrated Assessment Scoping Report (02.01.01) conclude that the declaration of climate emergencies by the GM districts would not have a material impact on the IA objectives and criteria used to assess the plan.</p> <p>It is considered that IA objectives and criteria are an appropriate framework to assess the plan. In terms the of Sustainability Appraisal, the IA framework meets the requirements of section 19 (5) of the Planning and Compulsory Purchase Act 2004. In terms of Strategic Environmental Assessment, the IA framework meets the requirements of the Environmental Assessment of Plans and Programmes Regulations. These requirements are outlined in Section 2.1.1 of the Integrated Assessment Scoping Report (02.01.01)</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
7.2	There has been a failure to consider reasonable alternatives in the context of the proposed site allocations. The Integrated Assessment relies upon the site selection methodology for determining what reasonable alternatives to assess however, there are fundamental flaws in that process. This demonstrates the arbitrary and non-transparent approach to the various stages of the process. Sites outside the areas of search are not assessed. The identification of the areas of search is based upon flawed, and often unclear, methodology. Within the areas of search, it is not clear how different site options have been assessed and discounted.	Reasonable alternatives to the PfE allocations have been considered through the site selection methodology (see Section 6.44 – 6.47 of the Site Selection Background Paper (03.04.01)). The approach to site selection is considered to be robust in the Site Selection Background Paper. No changes to the PfE are considered necessary.
7.3	Welcome the preparation of the Integrated Assessment of the PfE Growth and Spatial Options and reserves the right to make further comments on the document leading into the Examination	Comment noted.
7.4	No account has been taken of the carbon implications of any of the proposed developments. The required calculations of the carbon consequences of the Growth and Spatial Options Strategy have not been published in the Integrated Assessment. Hence, the growth assumptions and the carbon consequences of the proposed building boom, mean that the outcomes of the Integrated Assessment (including the Strategic Environmental Assessment and Health Impact Assessment) are called into question.	It is considered that the Integrated Assessment has sufficiently covered issues relating to carbon through IA Objective 15 and the associated objective criteria (see page 220 of the Integrated Assessment Scoping Report 02.01.01) which is in line with the requirements of the Strategic Environmental Assessment regulations and Sustainability Appraisal regulations as discussed in Section 6.2 of the Integrated Assessment Scoping Report (02.01.01). Section 6.8 of the Growth and Spatial Options Paper (02.01.10) explains how the Integrated Assessment has assessed the Growth and Spatial Options in light of the declared climate emergencies and the desire to meet expertly determined carbon budgets, in so far as is appropriate and practicable in the preparation of a development plan document. No changes to the PfE are considered necessary.
7.5	The ratings of PfE Objectives against the IA Objectives are inappropriate. The lack of any negative ratings, together with some incompatibility between PfE and IA objectives) suggests a bias towards optimism or even the suppression of inconvenient evidence. The Integrated Assessment fails to meet the Government's SEA regulations as it does not take into account the systemic interrelations among these factors, including the cumulative impacts. Instead, a simplistic checklist approach has been taken, which is insufficient for proper understanding of impacts and how they combine.	It is considered that the Integrated Assessment, including the Health Impact Assessment, of the PfE has been sufficiently undertaken in accordance with Government's guidance on Strategic Environment Assessment and Sustainability Appraisal, including synergies between policies and cumulative impacts. No changes to the PfE are considered necessary.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	The relevant (Strategic Environmental Assessment) sections of the Integrated Assessment should be conducted again, to the required standard (or above). Also, the Health Impact Assessment component of the IA has not been carried out adequately. It should be carried out again, to at least an adequate standard, utilising expert advice from the experts on the relationships between public health, the natural environment and climate change.	

8. Infrastructure

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
8.1	RLAM fully supports the aspirations to provide affordable, high quality, digital infrastructure.	This is not a comment on supporting evidence but support for JP- C2.
8.2	Proposing more houses, more people, more businesses therefore more traffic. Where are you going to put these mythical new roadways?	The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026 . Allocation Policies provide information on transport requirements for each of the sites and more detail can be found in the individual Allocation Topic Papers.
8.3	The plan is totally contradictory to itself, on one hand you talk about being green, carbon neutral and clean air, on the other you want to build huge housing and warehousing estates removing the green lungs of the area and increasing traffic congestion. If you believe we are all going to be driving electric cars by the end of the decade you really do live in a fantasy world, again the infrastructure can't cope.	PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan to deliver the Vision and Objectives. As the Plan should be read as a whole, this approach is considered consistent with NPPF.
8.4	Building more houses is a government directive, but when selecting and building on the various sites it does not take into consideration the building of a suitable infrastructure to go with the new houses. Currently there is a shortage of schools, doctors and dentists and insufficient roads to accommodate current traffic.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P5 , JP-P6. JP- D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
8.5	Soundness - There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid.	The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.

9. Viability

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
9.1	<p>Issues raised around:</p> <ul style="list-style-type: none"> the mix of uses that have been subject to the viability assessment the technical nature of the report and difficulty for non-professionals to understand the methodology <p>Modifications requested for JPA2 Stakehill, if it should remain in the PfE Plan, should be split into two or three sub-allocations, in accordance with the Strategic Viability Report, Stage 2 Allocated Sites Viability Report (October 2020) and be afforded separate considerations.</p>	<p>The Allocation policy requirements have been tested through a viability assessment [03.01.04]</p> <p>The Allocation Topic Paper for Stakehill [10.01.56] sets out the high level conclusions from the viability study alongside the other work which has been undertaken to inform the allocation.</p> <p>The Delivery Topic Paper [03.01.05] seeks to provide a non technical summary of the viability study.</p> <p>Policy JPA 2 requires master-planning of the site which will take into account the outcomes of the Strategic Viability assessment therefore it is not considered that modifications are needed</p>
9.2	The Plan provides insufficient (i.e. there is none) evidence to demonstrate that the policy-on implications for net zero carbon development for non-residential development are credible. For this to be resolved the reference to workplaces should be removed in this paragraph because the Councils present no evidence to sustain this supposition.	No change is considered necessary. This policy sets a sustainability target for non-domestic buildings as BREEAM minimum rating of 'Excellent' and 'Outstanding' from 2028 in a stepped approach. It is considered that a proportionate evidence base has been provided to support the policy, it can be found in Carbon and Energy Implementation Study 2020 [04.01.01] paragraph 7.2, p.163-171 and the literature review evidence conclusions are on page 177-78. In terms of the viability of the policy, evidence is set out in the Strategic Viability Assessment Part 1 [03.03.01] pages 22/23, and technical appendices [03.03.03] page 5, also in Carbon and Energy Implementation Study [04.01.01] pages 163-171.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		<p>The modification is considered unnecessary. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>The modification is considered unnecessary. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>
9.3	<p>Concerns around Strategic Viability study assumptions around</p> <ul style="list-style-type: none"> • benchmark land value, • carbon mitigation costs • allocation of infrastructure costs • profit 	<p>No change considered necessary.</p> <p>A Strategic Viability Assessment Stage 1 was undertaken in accordance with the 2019 revised National Planning Policy Framework and the relevant sections of the Planning Practice Guidance (PPG). An Addendum was prepared to update the assessment in the light of the Stockport withdrawal and to review the assumptions in the light of Covid 19. [03.01.01-03.01.03]</p> <p>A Strategic Viability Stage 2 report was undertaken [03.01.04] in relation to the allocated sites. It is considered that a proportionate evidence base has been provided to support the policy.</p>
9.4	<p>Analysis of the SVA is clear in that the housing supply as a whole is not deliverable, with just under 70% of supply considered viable. The consequent effect of this is that the SVA concludes that only about 20% of the PfE affordable housing target is deliverable. The viability position across the plan area is likely to be worse than reported.</p>	<p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>

10. Site Selection

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
10.1	Any land released should minimise the loss of green belt, not the land easiest to build on chosen by the developers.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]
10.2	<p>Failure to have regard to key evidence in the site selection process:</p> <ul style="list-style-type: none"> - The Inspector's Report for the Oldham Unitary Development Plan (UDP) in 2005 recommended that part of our client's site, and the wider land forming part of the Spinners Way/Alderney Farm allocation GM20 for the Draft GMSF 2019, be removed from the Green Belt boundaries on the basis it performs no meaningful Green Belt function. This recommendation was rejected by the Council at the time. However, the Inspector's Report is an important material consideration now that the Green Belt boundaries are being reviewed. - Site selection methodology analysis suggests: <ul style="list-style-type: none"> • There is no reasoned rationale underpinning the site selection process. • There is no attempt to engage with the Green Belt Assessments carried out by LUC and no response to the requirements of the Framework in terms of amending Green Belt boundaries e.g. the need for boundaries to be clearly defined using physical features that are readily recognisable and likely to be permanent. <ul style="list-style-type: none"> • The absence of land ownership, legal constraints and viability factors from the site selection process has led to a situation whereby many of the site allocations in the PfE are not viable and there is no realistic prospect of such sites coming forward on the basis of the evidence available. • Analysis of our client's site applied against the Stage 2 site selection methodology shows that it performs better than most other site allocations listed at Appendix 3 of the Site Selection Background Paper. 	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Stage 3 of the process was a planning constraints and site suitability assessment of the relevant sites – this was informed by various evidence base documents, including the Green Belt Assessment.</p> <p>The Site Selection process was a strategic review of the submitted sites to identify those which meet the overarching PfE Strategy and Objectives, issues such as viability and land ownership were considered as part of the detailed site assessments.</p> <p>A strategic viability assessment, [03.03.01] has been published alongside the PfE Plan.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10..3	It is not clear what the rationale is for the selection of these criteria through the background paper. There is no attempt to link the 7 criteria with the vision or objectives of the PfE Plan or to the Integrated Assessment.	The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>A detailed critiques of the criteria and site selection process has been undertaken.</p> <p>Overall, the site selection process is considered to be opaque with fundamental flaws in the whole site selection process. The criteria itself is flawed and the sites identified as allocations by the GMCA do not perform well when assessed against those chosen criteria.</p> <p>It is not possible to make an informed assessment of the way in which the sites have been selected as there appears to be no reasoned rationale underpinning the site selection process.</p> <p>It appears that the GMCA's site selection process is based only upon sites promoted at least 2 years ago. There may have been fundamental changes in circumstances in the intervening period that the GMCA is not aware of e.g. certain sites may no longer be available for development, and it cannot be said with any confidence that the sites selected are optimal in terms of sustainable development.</p>	<p>The criteria reflect the approach to growth and spatial distribution as set out in the Growth and Spatial Options Paper [02.01.10]. The Options were subject to Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.02].</p> <p>The methodology was reviewed at each stage of the GMSF/PfE plan making process and the Site Selection documentation was updated to reflect any changes, as well as to take account of any new sites.</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology [03.04.08].</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10..4	<p>Site Selection Background Paper - there is no reasoned rationale underpinning the site selection process; there is no attempt to engage with the Green Belt Assessments carried out by LUC and no response to the requirements of the Framework in terms of amending Green Belt boundaries e.g. the need for boundaries to be clearly defined using physical features that are readily recognisable and likely to be permanent; and the absence of land ownership, legal constraints and viability factors from the site selection process has led to a situation whereby many of the site allocations in the PfE are not viable and there is no realistic prospect of such sites coming forward on the basis of the evidence available.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Stage 3 of the process was a planning constraints and site suitability assessment of the relevant sites – this was informed by various evidence base documents, including the Green Belt Assessment.</p> <p>The Site Selection process was a strategic review of the submitted sites to identify those which meet the overarching PfE Strategy and Objectives, issues such as viability and land ownership were considered as part of the detailed site assessments.</p> <p>A strategic viability assessment, [03.01.01] has been published alongside the PfE Plan.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10..5	<p>Site Selection Background Paper: The first 6 site selection criteria (listed at 6.15) are designed to support strategic objectives of the plan. At page 24 a seventh is introduced that applies to sites that deliver significant local benefits by addressing a major local problem/issue. This seventh criteria is designed to deliver benefits to the local community and does not have a spatial strategic objective. Five sites including JPA19 have been allocated on the basis that they ONLY meet this 7th criterion and it has not been evidenced or justified that meeting this seventh criteria alone constitutes exceptional circumstances. There is therefore no spatial case for exceptional circumstances for JPA19. The local case for exceptional circumstances for JPA19 appears to be the provision of high-end, low density executive housing for no unmet need. Site selection</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Section 6.15 of the Background Paper describes each site selection Criterion.</p> <p>Criterion 7 is not spatially distinctive, but it includes sites which have the potential to deliver significant local benefits by addressing a major local problem/issue. For a site to meet Criterion 7 it is required to bring benefits across a wider area than the development itself and/or would bring benefits to existing communities.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	criteria 7 is unsound and not justified, similarly JPA19 is an unsound and not justified allocation. Criteria 7 should be removed from PfE and the associated allocations that were included solely on the basis of meeting criteria 7, including JPA19.	The sites identified under Criterion 7 are considered to meet this definition and contribute to meeting the housing and employment needs in line with the Spatial Strategy. No change is required.
10..6	<p>The GMSF 'Call for Sites' exercise discounted some, generally smaller sites, in favour of larger strategic Green Belt. Many of these discounted sites should have come under the category of 'sequentially preferable' and should now be considered. This discounting created an 'unsafe' method for selecting the allocation sites. Much greater emphasis should have been given to the potential to remediate Brownfield land, which is land generally within urban areas. Little account has been made of the potential of other sites becoming viable or available over the Plan period.</p> <p>The viability of Brownfield sites and Green Belt land should be reassessed using revised criteria which give greater weight to the Climate Emergency and peoples' physical and mental health needs.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>The PfE is a strategic plan and therefore larger sites, in some cases, were better able to meet the overarching PfE spatial strategy and objectives. However, there was no size threshold applied to the Site Selection process that excluded smaller sites.</p> <p>Criterion 1 relates to sites which have been previously developed.</p> <p>Sufficient land has been identified to meet the housing and employment land needs in the plan period, see Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04].</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology [03.04.08]. Issues such as Climate Change were therefore considered as part of this process.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10..7	The selection of the sites should have been based on a robust and consistent site selection process which was undertaken following a strategic Green Belt review. This has not happened.	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology [03.04.08].</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10.8	The site selection methodology is too simplistic and it does not provide a sound basis for identifying potential new sites. It results in Areas of Search being clustered around existing public transport nodes, close to town centres and within or close to wards identified as being the most deprived in England. It is not clear how this relates to the wider challenge of addressing the major housing and economic challenges across the city region that require transformation and radical policy responses. Furthermore, criteria 2, 3,	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Criteria 1-5 have been mapped spatially – see Appendix 3 of the Site Selection background paper which shows the Areas of Search and Site Selection criteria.</p> <p>Criteria 6 and 7 are not spatially distinctive, see Table 1 of the background paper for information on how the thresholds for these criteria have been applied.</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>6 & 7 cannot be mapped in a spatial way so it is not clear how the GMCA has exercised judgement in relation to these criteria.</p> <p>A detailed assessment has been undertaken, against these criteria, for land at Drummers Lane, Bryn.</p>	<p>The Site Selection process is considered sound and no change is necessary.</p>
10.9	<p>The Site Selection process generally downplays the values of the environment which leads to many of the allocations being unsound. Sustainability criteria should have been more robustly applied to better understand the Green Belt purposes of sites, together with nature conservation, farm production and agricultural land quality and other material factors such as storing carbon, such as the peat and mossland areas.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Stage 3 of the process was a planning constraints and site suitability assessment of the relevant sites. The site suitability assessment used constraints data based on the IA objectives – see Appendix 6 Site Suitability methodology [03.04.08] of the Site Selection Background Paper.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10.10	<p>The site selection process has been opaque with no explanation as to why some sites in the 'call for sites' were excluded from the plan, repeat the process using national and GMCA guidelines for site selection. Meetings should be recorded and the rationale for the selection/rejection of every site should be available including considered alternatives.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Appendix 9 sets out the list of all sites submitted for consideration and Appendix 7 sets out a summary of the planning assessments carried out.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10.11	<p>The site selection process in Bury has been opaque with no explanation as to why some sites in the 'call for sites' were excluded from the Plan, repeat the process using national and GMCA guidelines for site selection. Larger sites have been selected to enable the viable delivery of the essential major infrastructure to support the development, with no regards to the needs of Walshaw residents or their physical or mental health.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Appendix 9 sets out the list of all sites submitted for consideration and Appendix 7 sets out a summary of the planning assessment.</p> <p>The PfE is a strategic plan and therefore larger sites, in some cases, were better able to meet the overarching PfE spatial strategy and objectives. However, there was no size threshold applied to the Site Selection process that excluded smaller sites.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>
10.12	<p>There are concerns with the Site Selection Background Paper July 2021 and its appendices. Stage two of the Site Selection methodology identifies broad areas of search and scores sites against 6 criteria. But the methodology only retains those sites that were identified in the 2016 GMSF. It does not revisit the search to see if there are any better performing areas of search. This means that sites such as Wigan Road in Standish do not benefit from a proper up to date assessment in the PfE.</p>	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>The methodology was reviewed at each stage of GMSF/PfE plan making process and the Site Selection documentation was updated to reflect any changes, as well as to take account of any new sites.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>

11. Alternative Sites

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
11.1	Turner Newall's former asbestos factory is a 74 acres brownfield site in need of remediation, within the urban area, and close to the Town Centre and transport hubs, as opposed to the Green Belt sites proposed for allocation.	See Omission Report row OSR.5
11.2	<p>Timperley Wedge - The site extends to 34.9 acres and is located to the south of Timperley within the administrative boundary of Trafford Borough Council. The site is made up of four fields currently in use as agricultural land. Land west of Wellfield Lane (Parcel A) is made up of a single field comprising 7.06 acres. The site is unconstrained and considered deliverable within the early part of the plan period for the following reasons: - The site can be safely accessed from the existing highway network from both Clay Lane and Wellfield Lane; - The site is developer backed and requires no major infrastructure improvements to come forward; - There are no major technical or environmental constraints which would prohibit early development of the site; and, - The land is in single ownership and together with two adjacent landholdings could provide up to 80 acres of readily developable land. Furthermore, the Greater Manchester Green Belt Assessment (2016) identifies the land as performing weaker against Green Belt purposes than the land currently identified as forming the draft allocation. Therefore, in principle there would be no strategic issues preventing an alteration to the proposed boundary of the allocation.</p>	See Omission Report row OSTR.3
11.3	<p>The site at Rossmill Lane was assessed under parcel reference TF53 of the Greater Manchester Green Belt Assessment 2016. We do not agree with the assessment of the site in the 2016 Green Belt Assessment. The site is extremely well contained and is surrounded by permanent built development on all sides, including residential development and roads. The land is physically and visually separated from the wider countryside. The site cannot therefore be said to perform strong roles in assisting in check the unrestricted sprawl of large built-up areas (purpose 1) or safeguarding the countryside from encroachment (purpose 2). The conclusions of the Green Belt Assessment are simply not credible. We consider that the site does not serve any meaningful Green Belt function, and it is not necessary to keep the land permanently open. We therefore propose that the land is released from the Green Belt. It could be allocated for development as per our representations to the consultation in 2019.</p>	See Omission Report row OSTR.2

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
11.4	Land North of Junction 8 M60 should be considered as an additional site for Green Belt release and allocation, either for employment development or as a safeguarded site. It serves no more than a 'weak' contribution to any of the purposes of the Green Belt. As such further consideration should be given to the allocation of this additional Green Belt site, given its excellent sustainability credentials and ability to act as a logical infill site for Stretford.	See Omission Report row OSTR.5
11.5	Land at Holme Valley, Hollingworth is deliverable as a suitable site for residential development with capacity to deliver circa 700 houses which will help facilitate the planned A57 Mottram Bypass. The Green Belt Assessment 2016 should be updated to ensure that sites are correctly assessed in the interests of effective plan making.	See Omission Report row OSTa.3

12. Locality Assessments

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
12.1	The updated locality assessments do not contain sufficient information to understand how the SRN needs to respond to the growth being proposed in the Plan. It is acknowledged, however, that further transport evidence regarding the SRN is underway. The 'Highways England Future Work Programme should include a highway report that would act as a repository for key transport (highway) evidence to enable further comment on the impacts of the PfE.	<p>The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan [01.01.01].</p> <p>Each individual Allocations Policy in Chapter 11 of the PfE Plan includes reference to SRN infrastructure requirements where these are directly necessary for the site to be allocated.</p> <p>The Allocations Policies have been informed by the Transport Locality Assessments [09.01.07 through to 09.01.28] which set out the process by which the necessary or supporting, transport infrastructure improvements have been identified – including SRN improvements.</p> <p>We recognise the need to continue the collaborative work with National Highways which is currently underway that examines the wider implications of growth on the SRN.</p>
12.2	The locality assessments should provide a breakdown of the local count data used in the model for that locality and the model calibration and validation results at those sites should be shared. Without this information the strength of the evidence cannot be verified.	A proportionate transport evidence base, using the best available data, has been provided to inform the allocations policies. The methodology use to prepare the traffic evidence for each allocation is contained in the introduction of the Transport Locality Assessments [09.01.07 through to 09.01.28] and further technical explanation of the modelling can be found in the Strategic Modelling Technical Note [09.01.04] . Regarding the use of the GMVDM/SATURN model, a review of the network coding was undertaken in the vicinity of

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		<p>each of the allocations and, where necessary, coding improvements were made to better reflect the actual network situation.</p> <p>The best available data was used from the Strategic Model to represent a robust “policy-off/worst-case” scenario. It was considered impractical to undertake further traffic counts to undertake more detailed local model calibration while the impact of COVID had dramatically changed the patterns of traffic on the network. This approach reflects the strategic nature of the plan, and it is recognised that more detailed assessments will be required later in the planning process which would need to more accurately reflect the pattern of traffic on the highways at the time of the planning application and develop final, rather than indicative proposals, which mitigate the impact of the site.</p>

13. Transport

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
13.1	The existing baseline conditions and the assessment of growth proposals are not fully addressed, and it is not possible to comment on the sustainability of the proposed strategic site allocations. It is acknowledged, however, that further transport evidence regarding the SRN is underway.	<p>The Allocations Policies have been informed by the Transport Locality Assessments [09.01.07 through to 09.01.28] which set out the assessment methodology used to identify the necessary or supporting, transport infrastructure improvements for each allocation – including an understanding of existing conditions and growth proposals.</p> <p>We recognise the need to continue the collaborative work with National Highways which is currently underway that examines the wider implications of growth on the SRN.</p>
13.2	The 2040 Transport Strategy may not fully account for the requirements for intervention at the SRN emerging from the "Highways England Future Work Programme", which is still ongoing.	<p>A proportionate transport evidence base, using the best available data, has been provided to inform the plan policies, and the Plan is supported by the overarching principles and priorities and goals of the Greater Manchester Transport Strategy 2040 [09.01.01].</p> <p>All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] – this and associated Local Implementation Plans will be regularly updated, to ensure that the infrastructure requirements of the allocations adequately reflect updated evidence.</p> <p>We recognise the need to continue the collaborative work with National Highways which is currently underway that examines the wider implications of growth on the SRN.</p>
13.3	<p>With respect to the Transport Delivery Plan:</p> <ul style="list-style-type: none"> SRN schemes necessitated by the PfE plan proposals are not referenced 	All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] –

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<ul style="list-style-type: none"> • Need to clarify relationship between the transport strategy delivery plan, the GMIP, and the infrastructure requirements that arise from the PfE growth proposals • Need clearer link between the evidence of transport impacts that arise from the PfE, and the subsequent plan for the delivery of transport infrastructure. • Delivery Plan need to reflect evidence emerging from on going SRN work. 	<p>this and associated Local Implementation Plans will be regularly updated, to ensure that the infrastructure requirements of the allocations adequately reflect updated evidence. We recognise the need to continue the collaborative work with National Highways which is currently underway that examines the wider implications of growth on the SRN.</p>
13.4	<p>Wigan and Salford councils are being negligent towards residents of M28 with regard to high levels of traffic and congestion, limited highway capacity, noise and atmospheric pollution from vehicles, lack of public transport, lack of access to amenities, questions about sewer capacity of Leigh Road, and no plans to resolve these issues.</p>	<p>A number of policies in the Plan provide a sufficient policy framework to address these issues. Policies JP-C1 to C7, JP-P1, JP-P5 and JP-P6 require new development to be designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, healthy and sustainable environments, and must include, where appropriate, local infrastructure such as green spaces, schools and medical facilities.</p> <p>All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate. Allocations policies are informed by an assessment of cumulative impacts through the respective Transport Locality Assessments [09.01.07 through to 09.01.28] which concluded that the potential impacts of the allocations on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p> <p>The Greater Manchester Transport Strategy 2040 [09.01.01] recognises the potential negative impact of travel and transport and sets out our approach to minimise issues on the network as a whole.</p> <p>Issues in relation to flood risk and drainage are considered in Chapter 11 of the of the East of Boothstown Allocation Topic Paper [10.07.69]. Linked to this, criterion 6 of the allocation policy requires that development shall provide a detailed drainage and flood risk management strategy which addresses the outcomes of the Strategic Flood Risk Assessment, ensuring that development does not increase flood risk elsewhere. Criterion 7 requires sustainable drainage systems to accommodate sufficient space for any necessary flood storage.”</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>
13.5	<p>The Greater Manchester Transport Strategy 2040 should be considered unsound as it does not take account of horse riding, a requirement of the Department for Transport Local Cycling and Walking Infrastructure Plans – Technical Guidance (2.19).</p>	<p>Whilst it is considered that a specific reference to equestrians within the Connected Places chapter of the Plan could improve the clarity and scope of the policy, it is not considered to be a soundness issue, therefore no change is proposed. The issue is adequately covered</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
		<p>within our recently published “Streets for All Strategy”, which is a sub-strategy of the Greater Manchester Transport Strategy 2040 [09.01.01], which sets out how we intend to ensure that the competing needs of different road users are considered where appropriate.</p> <p>An introduction to Streets for All approach is set out in the Transport Topic Paper [09.01.29] and a Streets for All Design Guide is soon to be published. This guidance will set out how we design streets for all users along with their interface with, for example, leisure routes and public Rights of Way. The needs of specific groups such as disabled people, emergency services, people using powered two wheelers and horse riders will be considered as part of the design guidance.</p>

14. Impact Assessment

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
14.1	The ecological impacts of the plan have not been independently assessed, as the current assessments were conducted on behalf of the developers.	It is considered that a proportionate evidence base has been provided to support the plan provided by industry expert and professionals.

15. Flood

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
15.1	JPA 24 fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter14. In recent years, the River Roch, and at this point in particular, has flooded regularly, causing devastation and damage to hundreds of properties and businesses. The fields, currently used as grazing farmland for cattle and sheep, which are planned to be built upon, are vital for the absorption of surface water and slow down the runoff of rainwater downhill where it joins the river. The building of houses and roads on these fields will reduce the surface water absorption and cause more rapid and increased water run off so that river levels will rise much higher and much more quickly. The greatest impact from any	<p>Policy JP-S5 of the plan sets out the overall approach to managing flood risk.</p> <p>Section 11 of the Roch Valley Allocation Topic Paper 10.06.40 deals with issues relating to flood risk and drainage. The conclusion from this and the SFRA which evidences this has resulted in the inclusion of a policy requirement (criterion 3) to safeguard the land between the developed part of the site and the River Roch to contribute to measures that deliver flood alleviation benefits for the River Roch catchment between Littleborough and Rochdale town centre. A planning</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
	<p>development on this land will be loss of land for the rainwater to soak into as it becomes covered in concrete and tarmac and no number of "overflow basins" will be able to solve that problem!</p> <p>It will cause flooding up stream as river flow is unable to cope with the amount of water so it backs up and it will increase flooding downstream, including local villages and Rochdale Town Centre.</p> <p>This land would be better served by being left as grazing pasture, to maintain air quality and community enjoyment, or by having some woodland planted to help alleviate the flooding problem.</p> <p>This site fails to comply with PfE Objective 7 and is not consistent with adapting to Climate Change, moving to a low carbon economy and NPPF Chapters 2 (para. 8) and 9.</p>	<p>application has been submitted on this site and there is engagement between the applicant and the Environment Agency in relation to flood risk and drainage.</p>
15.2	<p>Note that there has been a recent change in national climate change guidance and allowances which were published in July 2021. The Level 1 SFRA document refers to this change but the allowances the assessment is based on is behind current guidance. For the Greater Manchester SFRA, the modelled 1 in 100 AEP event +70% flood outlines have been screened against the sites, where they are available; 70% being the "upper end" allowance in the previous guidance. The updated (July 2021) guidance and allowances is based on more localised catchments and for the Greater Manchester authorities the upper end allowances are now between 75-90%. However, the current SFRA assessments should still represent a reasonable reflection of risks when compared against the updated climate change guidance (July 2021) and is an appropriate approach based on the evidence available at the time.</p>	<p>Noted. No changes to the PfE are considered necessary.</p>

16 - Call for Sites

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021
16.1	The GMSF 'Call for Sites' exercise discounted some, generally smaller sites, in favour of larger 'strategic' Green Belt. Many of these discounted were sites should have come under the category of 'sequentially preferable' and should now be considered. This discounting created an unsafe method for selecting the allocation sites. Much greater emphasis should have been given to the potential to remediate Brownfield land, land generally already within the prescribed urban areas. Little account has been made of the potential of other sites becoming viable or available over the Plan period.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] . The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.

Appendix:

10. Site Selection

Table 1: Supporting Evidence - Site Selection

Row	Respondent name
10.10	Suzanne Nye Matthew Oxley Craig Smith C Smith Carol Mole Julie Darbyshire DonnaNuttall Susan Tunstall Stephen Cluer Clare Bowdler TrevorByrne Christopher Russell Barbara Wilkinson Lucy Marsden

Summary of main issues Raised – Supporting Evidence

Row	Respondent name
	Daniel Marsden
	Andrea Booth
	Julie Halliwell
	Jane Lester
	The Friends of Bury Folk
	Maika Fleischer
	Elisabeth Berry
	Donald Berry
	Jason Robinson
	Katherine Robinson
	Councillor Jackie Harris
	Save Crimble Mill Greenbelt Group
	Alex Abbey
	Jane Bennett
	Carl Mason
	Graham Walsh
	Mary Walsh
	G R Walsh
	David Brownlow
	Lisa Mather

Summary of main issues Raised – Supporting Evidence

Row	Respondent name
	Peter Mather
	Deborah Morgan
	Andrea Keeble
	Susan Higgins
	Oscar Majid
	Stuart Johnstone
	Susan Fleming
	Juliet Eastham
	Yvonne Robinson
	Catherine Schofield
	Andrew Fleming
	Michelle Mcloughlin
	Joan Glynn
	Tom Wood
	Viv Barlow
	Jacqueline Majid
	S Stratton
	Colin Heaton
	Hazel Keane
	John Robinson

Summary of main issues Raised – Supporting Evidence

Row	Respondent name
	Susan Horridge
	Shirley Buckley
	Barry Spence
	Joanne Dawson
	George Wood
	Joanne Culliney
	Annmarie Bennett
	Christopher Culliney
	Rebecca Robinson
	Alexandra Saffer
	Daniel Robinson
	Derek M Glynn
	Carole Martin
	Geoff Woods
	Carolyn Saffer
	Samantha Doggett
	Lucy Taylor
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw

Summary of main issues Raised – Supporting Evidence

Row	Respondent name
	Paul Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Wright
	Brian Cooke
	Kelly Fox
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Abby Derere
	Craig Tucker
	Victoria Hothersall
	Jacqueline Yarwood
	Adam Burgess
	Anna Katherine Burgess
	Alan Bayfield
	Debbie Pownceby

Summary of main issues Raised – Supporting Evidence

Row	Respondent name
	Rebecca Hindle
	Marjorie Higham
	Gwynneth McManus
	Gwyneth Derere
	Nicola Kerr
	Julia Gallagher
	Andy Skelly
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Peter Cooke
	Emma Nye
	Kath Dobson
	Patricia Hay
	Leanne Labrow
	Pamela Maxon
	Alexandra Cluer
	Dawn Johnstone

Summary of main issues Raised – Supporting Evidence