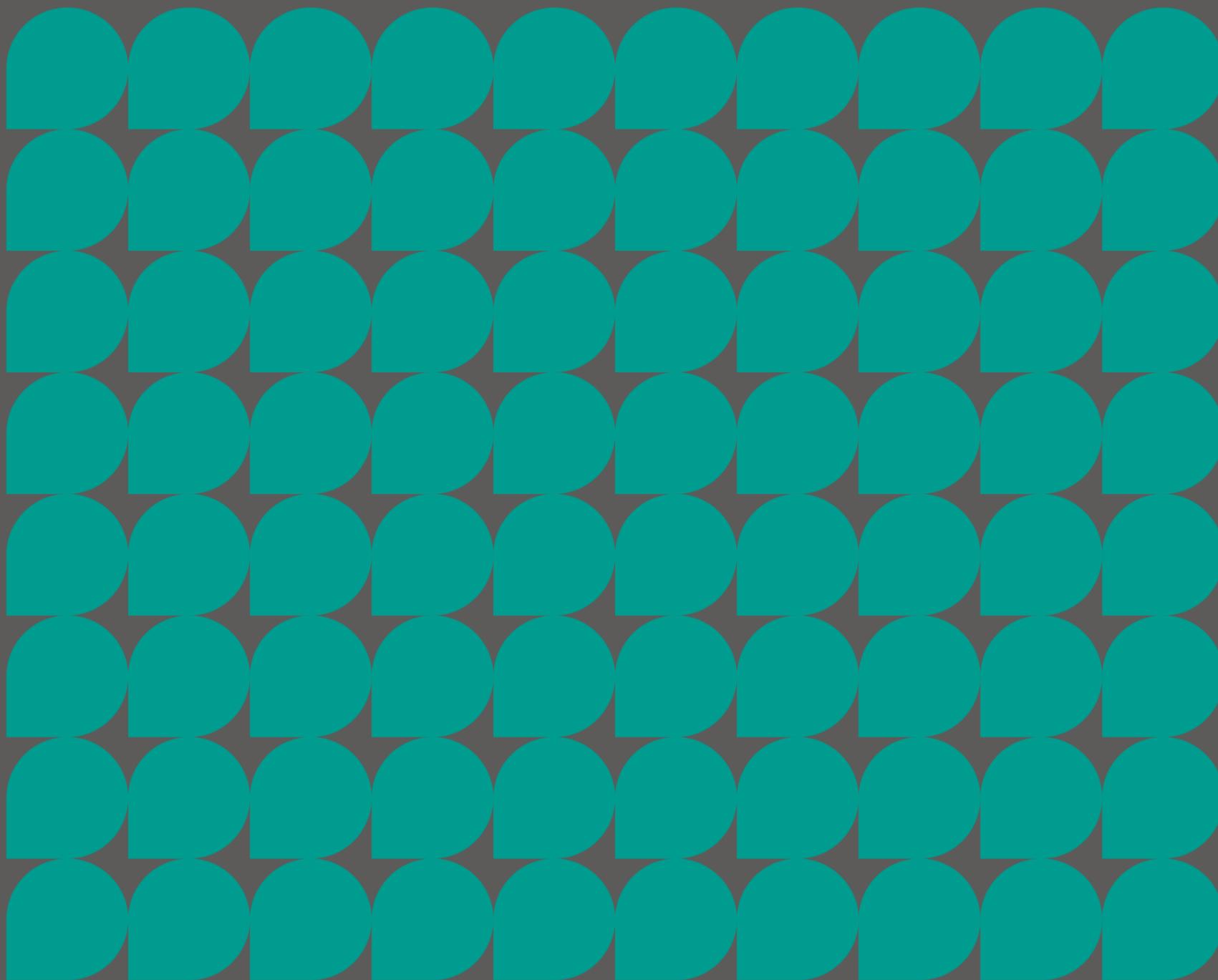


Places for Everyone

Supporting Evidence Issues Summary

February 2022



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 issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
1.1	I can't find any reason to believe that the documents are not legally compliant.	Support noted.	Terence Kelly
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.	JudithHoward John Paul Ashworth Kathryn Russell Julie Halliwell Jane Lester The Friends of Bury Folk Matthew Oxley Craig Smith C Smith Carol Mole Julie Darbyshire Donna Nuttall Susan Tunstall Stephen Cluer Clare Bowdler Trevor Byrne Christopher Russell Barbara Wilkinson Lucy Marsden Daniel Marsden Andrea Booth Juliet Eastham
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	Craig Smith C Smith Lucy Marsden Daniel Marsden Matthew Oxley The Friends of Bury Folk Clare Bowdler Jane Lester Carol Mole Julie Darbyshire

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Donna Nuttall Susan Tunstall Stephen Cluer Trevor Byrne Christopher Russell Barbara Wilkinson Andrea Booth Julie Halliwell Juliet Eastham
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)	Save Greater Manchester's Green Belt (SGMGB) Oldham Groups Save Greater Manchesters Green Belt (SGMGB) Bury Groups Save Greater Manchesters Green Belt (SGMGB) Apethorn and Bowlacre Groups
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] .	Paul Roebuck
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.	Philip Smith-Lawrence Ian Culman Roy Dennett Susan Dennett Holly Dennett Daniel Lawson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	Lindsay Connolly
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 . The approach to growth is set out in the Growth and Spatial Options Paper [02.01.07]	Graham Oldfield
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	E J Glew

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
1.10	Consultation not carried out as agreed, there was no contact by email, those next to proposed development have not been consultation. You have relied on social media. The questions asked are to illicit the responses you want.	See Row 1.6	Laura Charlotte
1.11	No clear consultation undertaken and document is too long.	See Row 1.6	Jacqueline Charnock
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	Colin Heyworth
1.13	Overall, the consultation and engagement with residents has been very poor, particularly prior to the 2020 documentation release.	See Row 1.6	Friends of Carrington Moss
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)	Hilary Rhoden
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] .	Housebuilding Consortium
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 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.	John Williams

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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	Kate Tod
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.	Sheila Tod
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.	Trevor Widdop
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	Mary Sharkey
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	Martin Naylor
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	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	Jeanette Tilstone

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.	Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)	
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	Ian Culman Roy Dennett Susan Dennett Holly Dennett Daniel Lawson
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 you great ideas will be achieved.	See Row 1.6	Ann Guilfoyle
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	Taylor Wimpey
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.	Taylor Wimpey
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.	Linus Mortlock
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	Carole Easey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	Sport England

2. Duty to Co-operate

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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	Margaret Fulham
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	Janine Richardson
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	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	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.	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 with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester	Home Builders Federation
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	Taylor Wimpey

3. Economic

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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] .	Thornham St John's Neighbourhood Forum Zoe Sherlock

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
3.2	<p>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.</p> <p>Also, there are no partners or industries identified for employment provision. Major partners for employment provision should be identified.</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>At this stage in the process, it is unrealistic to expect potential employers/businesses to be identified for sites proposed for employment.</p>	Juliet Eastham

4. Housing

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
4.1	<p>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</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. 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</p>	Save Greater Manchester's Green Belt(SGMGB) Rochdale Groups

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.	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]	Zoe Sherlock
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: Housing Market Area Local Housing Need Methodology Economic Growth Affordability Appropriate Housing Need for Greater Manchester.	It is considered that the Strategic Housing Market Assessment [06.01.02] provides an appropriate evidence framework to support PfE	Metacre Ltd
4.4	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	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.	Bernie Burns

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>and lost forever, with the inevitable impact on the environment and biodiversity of the area.</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 growth and it does not seek to maximise the opportunity for economic and social development across the boroughs.</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 in terms of employment and housing, respectively. As explained in that document, Stockport MBC has been unable to provide evidence demonstrating unmet need.</p> <p>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</p>	Sophia Flemming Consulting Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	Elaine Robertson Catherine Poulton
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)	Redrow Homes (Lancashire)
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.	Housebuilding Consortium Taylor Wimpey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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. 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>	<p>Housebuilding Consortium Taylor Wimpey</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>	<p>Housebuilding Consortium Taylor Wimpey</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>	<p>Housebuilding Consortium Taylor Wimpey</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</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.</p>	<p>Hollins Strategic Land</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>bedroomed apartment schemes, the vast majority of which will not deliver any affordable homes.</p> <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>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>	
4.13	<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>	<p>Craig Smith C Smith Lucy Marsden Daniel Marsden Matthew Oxley The Friends of Bury Folk Clare Bowdler Jane Lester Carol Mole Julie Darbyshire Donna Nuttall Susan Tunstall Stephen Cluer Trevor Byrne Christopher Russell Barbara Wilkinson Andrea Booth Julie Halliwell Juliet Eastham</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</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</p>	<p>Craig Smith C Smith Lucy Marsden</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.	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.	Daniel Marsden Matthew Oxley The Friends of Bury Folk Clare Bowdler Jane Lester Carol Mole Julie Darbyshire Donna Nuttall Susan Tunstall Stephen Cluer Trevor Byrne Christopher Russell Barbara Wilkinson Andrea Booth Julie Halliwell Juliet Eastham
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>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>	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]	Redrow Homes (Lancashire)
4.16	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	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.	NPL Group Bowden Rugby Club Miri Roshni W R Halman

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.		C L Halman F I Carless J M Gibney
4.17	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. 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.	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.	Mark H Burton
4.18	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.	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] .	Story Homes Limited
4.19	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 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.	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 guidance. Therefore, its conclusion that Greater Manchester can be defined as a single housing market for planning purposes, is reasonable	Housebuilding Consortium

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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] .	Rowland Homes
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] .	E J Glew

5. Green Issues

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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 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.	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.	Natural England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<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>	Janet Millett
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</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>	Mineral Products Association

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	LAAS and NAWWP annual reports. A review 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>	Iain Gartside Catherine Poulton Elaine Robertson
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. 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>	Gaynor Kinsley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
5.6	<p>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 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.</p>	<p>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.</p> <p>No changes to the policy are considered necessary.</p>	Simon Haughton
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.</p> <p>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.</p> <p>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.</p> <p>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>	Shanas Gorton Kavanna Gorton

6. Green Belt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
6.1	<p>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>	<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>	Thornham St John's Neighbourhood Forum
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>	Philip Bailey
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>	Philip Bailey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
6.4	Green Belt Assessment 2016 should be updated to ensure that sites are correctly assessed in the interests of effective plan making.	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.	Landowners of Holme Valley
6.5	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.	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.	Chasten Holdings Ltd
6.6	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.	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.	GLP Ltd
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.	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. 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.	Hollins Strategic Land
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	See response to Row 6 above.	Seddon Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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.		
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.	Seddon Homes Ltd
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.	Murphy Group
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]	Geoffrey Ralphs
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.	NPL Group
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.	Sandra Radcliffe
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.	Deborah Pitt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	SRH Properties Ltd

7. Integrated Assessment

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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 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>	Friends of Carrington Moss
7.2	<p>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.</p>	<p>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.</p> <p>No changes to the PfE are considered necessary.</p>	Hollins Strategic Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	Taylor Wimpey
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.	<p>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).</p> <p>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.</p> <p>No changes to the PfE are considered necessary.</p>	Climate Action Bury
7.5	<p>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.</p> <p>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.</p>	<p>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.</p> <p>No changes to the PfE are considered necessary.</p>	Mark Burton

8. Infrastructure

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	Royal London Asset Management
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.	Graham Winstanley
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.	David Mclaughlin
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	Fiona Ogg
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.	Juliet Eastham

9. Viability

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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>	Thornham St John's Neighbourhood Forum
9.2	<p>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.</p>	<p>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.</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> <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</p>	Derwent Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		particular circumstances justify the need for a viability assessment at the application stage.	
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>	<p>Northern Gateway Development Vehicle LLP</p> <p>Haworth Group</p> <p>Taylor Wimpey</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>	<p>Housebuilding Consortium</p> <p>Taylor Wimpey</p>

10. Site Selection

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
10.1	<p>Any land released should minimise the loss of green belt, not the land easiest to build on chosen by the developers.</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. 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</p>	<p>D W & J Tandy</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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>	Joe Jaskolka
10..3	<p>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.</p> <p>A detailed critiques of the criteria and site selection process has been undertaken. 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>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 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>	Hollins Strategic Land Wainhomes (NW) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<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 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>	Chasten Holdings Ltd
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. 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>	Save Royton's Greenbelt Community Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	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. 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>	Thornham St John's Neighbourhood Forum
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>	Taylor Wimpey
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	The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and	Barratt Manchester Limited

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>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, 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>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. 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> <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>	CPRE
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>	See Appendix.
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.</p> <p>However, there was no size threshold applied to the Site Selection process that excluded smaller sites.</p>	Catherine Poulton

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Site Selection process is considered sound and no change is necessary.	
10.12	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>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>	Seddon Homes Ltd

11. Alternative Sites

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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	Thornham St John's Neighbourhood Forum
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.</p> <p>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	Hollins Strategic Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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	Bobby Arora
11.4	<p>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.</p>	See Omission Report row OSTR.5	NPL Group
11.5	<p>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.</p>	See Omission Report row OSTa.3	Landowners of Holme Valley

12. Locality Assessments

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
12.1	<p>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>	<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>	National Highways
12.2	<p>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.</p>	<p>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 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>	James Aylmer-Shanks

13. Transport

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	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. 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.	National Highways
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.	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] . 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. 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.	National Highways
13.3	With respect to the Transport Delivery Plan: <ul style="list-style-type: none"> • SRN schemes necessitated by the PfE plan proposals are not referenced • 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. 	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. 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.	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<ul style="list-style-type: none"> • Delivery Plan need to reflect evidence emerging from on going SRN work. 		
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>	Philip Crombleholme
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 within our recently published</p>	The British Horse Society

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>“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 issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
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.	Elaine Robertson

15. Flood

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
15.1	JPA 24 fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter 14. 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	<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</p>	Victoria Turner

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>so that river levels will rise much higher and much more quickly. The greatest impact from any 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. 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>measures that deliver flood alleviation benefits for the River Roch catchment between Littleborough and Rochdale town centre. A planning 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>	<p>Environment Agency</p>

16. Call for Sites

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
16.1	<p>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.</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>	<p>Thornham St John's Neighbourhood Forum</p>

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 Donna Nuttall Susan Tunstall Stephen Cluer Clare Bowdler Trevor Byrne Christopher Russell Barbara Wilkinson Lucy Marsden

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

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

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

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

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