Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	Stakeholder Submission
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	Our Strategic Objectives
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	1. Meet our housing need
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	An amendment is proposed to Strategic Objective 1 to ensure the policy is sound in being positively prepared and consistent with national policy. Please see the written representations and technical appendix submitted.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect	An amendment is proposed to Strategic Objective 1 to ensure the policy is sound in being positively prepared and consistent with national policy. Please see the written representations and technical appendix submitted.

of any legal compliance or soundness matters you have identified above.	
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	JP-S 1 Sustainable Development
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	An amendment is proposed to Policy JP-S1 to ensure the policy is sound in being positively prepared and consistent with national policy. Please see the written representations and technical appendix submitted.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	An amendment is proposed to Policy JP-S1 to ensure the policy is sound in being positively prepared and consistent with national policy. Please see the written representations and technical appendix submitted.
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details	The Commissioners have a number of concerns regarding draft Policy JP-H 1 which relate to:
of why you consider the consultation point not to be legally compliant,	-The proposed distribution of new housing across the Boroughs which comprise Greater Manchester; and
is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	-The clear disparity between the identified Local Housing Need within Trafford as identified in the SHMA (2021), and the amount of new housing proposed for the Borough within the PFE Joint Development Plan, equating to a deficit of 4,078 dwellings within Trafford over the Plan period.
	The Commissioners believe that the current approach is not positively planned, not justified and is at risk of not being effective and is therefore unsound in that it does not comply with national planning policy. Additional sites should be allocated for residential development within the PFE Joint Development Plan. Please see the written representations and technical appendix submitted.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Amendments and further allocations are proposed to Policy JP-H1 to ensure the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted.
- Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and
- Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted.
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted.
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / Organisation 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing Deloitte
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / Organisation Type 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing Deloitte Web PFE1287332.pdf
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / Organisation Type Include files Soundness - Positively 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing Deloitte Web PFE1287332.pdf NA
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / Organisation Type Include files Soundness - Positively prepared? 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing Deloitte Web PFE1287332.pdf NA Unsound
 Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above. Company / Organisation Person ID Title Agent Company / Organisation Type Include files Soundness - Positively prepared? Soundness - Justified? 	the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted. Church Commissioners for England 1287332 JP-H 2 Affordability of New Housing Deloitte Web PFE1287332.pdf NA Unsound Unsound

Places for Everyone Representation 2021

Compliance - Legally	NA
compliant?	
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	In the absence of further strategic allocations for residential development within Trafford, the Commissioners consider that the approach which underpins draft Policy JP-H 2 is unsound, on the basis that it does not comply with national planning policy.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Amendments and further allocations are proposed to Policy JP-H2 to ensure the policy is sound in being justified and consistent with national policy. Please see the written representations and technical appendix submitted.
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	JP-G 10 Green Belt
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The Commissioners maintain that an incorrect approach to the Green Belt boundary has been carried through previous consultations and within the PFE Joint Development Plan. As such, the Commissioners also object to the extent of the Green Belt referred to in draft Policy JP-G 10, and believe the Commissioners"site at Bow Green should be removed from the Green Belt and allocated for residential development. Please see the written representations and technical appendix submitted.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Amendments and further allocations are proposed to Policy JP-G 10 to ensure the policy is sound in being positively prepared, justified, consistent with national policy and effective. Please see the written representations and technical appendix submitted.
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	JP-G 11 Safeguarded Land
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	The Commissioners believe that additional sites should be identified for allocation for residential development and for safeguarding within the PFE Joint Development Plan to support the delivery of the housing requirement. We have provided a Development Framework to support a residential allocation for the Land at Bow Green Farm, Bow Lane, Bowdon, which is appended to these representations submitted and attached.
comply with the duty to co-operate. Please be as precise as possible.	The allocation of the land at Bow Green Farm for residential development within the PFE Joint Development Plan would provide numerous benefits, including:
	-Contributing to the housing needs of Greater Manchester;
	-Providing a varied choice of housing, designed to improve local character and built to ensure a high standard of sustainable construction to meet the needs of future generations;
	-Providing a number of economic benefits including job creation (direct and indirect) and increasing the expenditure in the local economy by supporting the continued vitality and vibrancy of existing nearby services and facilities;
	-Improvement of vehicle, pedestrian and cycle connections;
	-Provision of high quality open space, including the retention of existing hedgerows and ponds as part of a site-wide SUDS network; and
	-Contributing to enhancing the landscape character through the provision of high quality green infrastructure.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Further allocations are proposed to Policy JP-G 10 & G 11 to ensure the policy is effective. Please see the written representations and technical appendix submitted.
Company / Organisation	Church Commissioners for England
Person ID	1287332
Title	Other Comments
Agent Company / Organisation	Deloitte
Туре	Web
Include files	PFE1287332.pdf
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA