

Chapter 4 – Strategy

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

PfE 2021 Our Strategy

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle		
Our Strat 1	The northern parts of the City region need to catch up and should seek to achieve increased targets for employment and housing growth in this regard. However, this should not be done at the expense of the south of the city region where there is increased demand for growth.	Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas but also sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The Plan as proposed is therefore considered sound and no change is necessary.	Bluemantle Gladman Developments Highgrove Strategic Land Harworth Group PD Northern Steels PD Northern Trust Asset Management Oltec Group
Our Strat 2	Support strategy for inclusive growth across GM, including boost to northern competitiveness and regeneration of inner city areas. It will address the disparities in the north which have resulted from past growth being concentrated in Manchester, Salford and Trafford where the city regions key economic assets are presently located	Noted	See Appendix.
Our Strat 3	Greater Manchester’s ambitions will not be met given the scale, diversification and pattern of development proposed within the Framework.	The Spatial Strategy is considered the most appropriate option to meet the ambitions for Growth as set out in PfE Chapters 6 ‘Places for Jobs’ and Chapter 7 ‘Places for Homes’. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes required.	David Morris Laura Charlotte
Our Strat 4	The south of Manchester is sufficiently populated and the north has a larger potential for growth and a higher demand for housing	See Row ‘OurStrat 1.1’.	Lauren Waite-Hughes
Our Strat 5	The proposed redistribution of housing requirements prevailing towards Manchester and Salford is not consistent with strategic policy objectives including the strategy to boost northern competitiveness.	The Spatial Strategy is very clear that the most significant growth will be in the Core Growth Area and that, alongside this, there will be increased levels of growth in the northern areas to boost the competitiveness of northern	Amy Bronte

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	Reducing Tameside's housing target in PfE from the standard methodology will also not boost northern competitiveness	Greater Manchester. Collectively the northern districts, including Tameside, meet about 100% of their local housing need as set out in the standard methodology. More information can be found in the Housing Topic Paper [06.01.03] and the Growth and Spatial Options Paper [02.01.10] .	
Our Strat 6	Growth is focused on Salford, Trafford and Manchester with low growth in the northern districts - this does not reflect the ambition of inclusive growth across GM.	The PfE Spatial Strategy is clear that the most significant growth will be in the Core Area and this is considered to be appropriate. However, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. Collectively the northern districts meet around 100% of their local housing need as set out in the standard methodology. More information can be found in the Housing Topic paper [06.01.03] and the Growth and Spatial Options Paper [02.01.10] .	Mark Priestner Landowners of Holme Valley
Our Strat 7	No evidence of industries that would be attracted to Northern areas and which would boost northern competitiveness.	The amount of industrial and commercial development has been sufficiently evidenced. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.	Julie Halliwell
Our Strat 8	Growth must be integrated with and strengthen the local identity of towns and communities in GM	PfE is a strategic plan and Chapter 4 'Strategy' sets the context for the whole PfE. JP-Strat 12 'Main Town Centres' requires development to be carefully managed to ensure that local distinctiveness is retained and enhanced. Policy JP-P4 also relates to town centres. The Plan should be read as a whole and it provides the framework for more detailed policies in district Local Plans.	Peter Thomson
Our Strat 9	Key assets should be given greater emphasis and the same weight as those in the north rather than just sustaining them in the south	The Strategy makes the most of key assets as essential to maximising the competitiveness of Greater Manchester and driving economic growth across the city region. The PfE Strategy also seeks to ensure that the southern areas continue to make a considerable contribution to growth by making the most of its key assets – such as Manchester Airport. See PfE Policy JP-Strat 9 'Southern Areas'. No change required.	Royal London Asset Management RLAM

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Our Strat 10	Agree that the strategy should seek to boost northern competitiveness, but the strategy for the southern areas should be to “preserve and enhance’ - rather than sustain.	No Change is considered necessary. The wording reflects the approach to growth and spatial distribution as set out in the Growth and Spatial Options Paper [02.01.10]	Hollins Strategic Land
Our Strat 11	The Plan as drafted is in parts inconsistent with the strategy and plan objectives, and this needs to be addressed in order for the Plan to be found sound and effective.	PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. The Plan should be read as a whole. See Growth and Spatial Options Paper [02.01.10] . No change considered necessary.	Save Greater Manchester’s Green Belt
Our Strat 12	Spatial Strategy based on aspirational employment growth which will not happen as population growth will be dominated by 65+. This should not be used as a reason for Green Belt release	The development proposals and delivery rates are considered to be ambitious, but realistic. They have been informed by past performance, the current and future projected demand and the aims and ambitions of the Local Industrial Strategy The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] . No change required.	Gillian Boyle
Our Strat 13	Little within the strategy regarding partners or industries that will give assistance in the delivery of the plan	The identification of specific partners for employment provision would not be included as part of a strategic plan. Objective 3 outlines the industries identified for the development of high value clusters in prime sectors. The Employment Topic Paper [05.01.04] and Employment Land Need in Greater Manchester [05.01.02] papers provide justification for the allocation of land for employment provision. No change required.	Andrew Scanlon
Our Strat 14	Consider that the Spatial Strategy should summarise the exceptional circumstances case for Green Belt release	It is not necessary to include this in Chapter 4 ‘Spatial Strategy’. The case for exceptional circumstances is explained in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt boundary [07.01.25] . No change required.	PD Northern Steels PD Northern Trust Asset Management
	Housing		
Our Strat 15	Consider the PfE growth assumptions are too high and there will likely be further economic shocks in the plan period.	The growth assumptions in PfE are based on a comprehensive and robust evidence base. Chapter 6 ‘Places for Jobs’ and Chapter 7 ‘Places for Homes’ set out the employment and housing land requirements.	Mark H Burton

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		More detail is set out in the Housing Topic Paper section [06.01.03] and Employment Topic Paper [05.01.04] . No change required.	
Our Strat 16	It cannot simply be assumed that demand for housing will be transferred to the opposite side of Greater Manchester (i.e. from south to north).	The Spatial Strategy is very clear that the most significant growth will be in the Core Growth Area, but that increased levels of growth will also be supported in the northern areas. This will boost the competitiveness of northern Greater Manchester and collectively the northern districts will meet about 100% of their local housing need as set out in the standard methodology. This will help to address the north/south imbalance. More information can be found on housing distribution is in the Housing Topic paper [06.01.03] .	Bowdon Rugby Club Miri Roshni J M Gibney W R Halman C L Halman F I Carless Bluemantle
Our Strat 17	Housing should be located close to employment areas - not just city centres	Whilst the most significant growth will be in the core area, development is also proposed in the northern and southern areas (see Growth and Spatial Options Paper [02.01.10]). In addition, policies in Chapter 10 'Connected Places', including Policy C 1 support a pattern of development that minimises the need to travel as well as delivering improved sustainable transport links to employment areas. No change required.	Murphy Group
Our Strat 18	The strategy focuses heavily on housing but does not reference the impact to existing residents	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, and mitigate any negative effects of development. The Plan needs to be read as a whole. No change required.	Lauren Millward Jeremy Williams Caroline Davies
Our Strat 19	The strategy is over reliant on high density housing in Manchester and Salford and risks limiting growth in other areas.	The PfE seeks to make the most efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area and Inner Areas. However, growth is promoted across the PfE plan area and details of the housing land supply in all areas can be found in the Housing Topic Paper [06.01.03] . No change required.	Murphy Group Murphy Group David Morris

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Our Strat 20	Support Spatial Strategy recognition of GM's role in levelling up 'the north'. PfE should make provision for ambitious housing growth to reflect this.	Support noted. PfE proposes ambitious housing growth and has identified sufficient land to meet its needs of almost 98,000 new homes. Details of the district housing targets are provided in Chapter 7 and details of the housing land supply can be found in the Housing Topic Paper [06.01.03]	Harworth Group Plc
Our Strat 21	The North is already crowded. There is no need for any more unnecessary housing.	The Spatial Strategy is clear that the most significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas and sustained growth in the southern areas. More information on housing needs can be found in the Strategic Housing Market Assessment [06.01.02] and Housing Topic paper [06.01.03] .	Trevor Widdop
Our Strat 22	The Strategy has an overreliance on high density housing schemes coming forward within or around town centres which can often have viability issues and are not always the right type of housing to meet family needs.	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. No change required.	Sarah Cox Rowland Homes
Our Strat 23	Concern that strategy will only be effective if GM functioned as one housing market area, which is not supported by current evidence	A proportionate level of evidence has been provided on the functioning housing market areas within the Strategic Housing Market Assessment [06.01.02] and the Housing Topic paper [06.01.03] . No change required.	Bowdon Rugby Club Miri Roshni J M Gibney W R Halman C L Halman F I Carless Milnes Gaskell Estate NPL Group
Our Strat 24	Affordable housing issues in south GM should be highlighted	Chapter 4 'Strategy' includes high level policies relating to the overarching PfE Strategy. More detailed policies relating to housing are in Chapter 7 'Places for Homes' and individual allocation policies.	PD Northern Steels PD Northern Trust Asset Management

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		Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. No change required.	
	Brownfield land		
Our Strat 25	The strategy fails to make regenerating town centres and vast areas of brownfield land the priority.	The PfE seeks to promote the development of brownfield land within the urban area, in line with NPPF. Policy JP-S1 states that preference will be given to using brownfield land. Policy JP-Strat 12 relates to the main town centres and sets out their role as local economic drivers. In addition, Policy JP-P 4 sets out the hierarchy of Town Centres in the PfE plan area. Further detail will also be provided in individual district Local Plans. No change required.	Howard Sykes Michael Hullock
Our Strat 26	Strategy should be amended to only encourage and support the re-use of brownfield land, not prioritise it.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No change required.	Murphy Group Redrow Homes Seddon Homes Seddon Homes GLP Trows LLP and BDW Trading Ltd GLP Ltd Boys & Girls Club of GM Seddon Homes & GLP
	Employment		
Our Strat 27	Question the scale of the employment areas in the Northern Areas, North East Growth Corridor and Wigan-Bolton Growth Corridor. Can this still be justified with changing working patterns? Jobs tend to be low paid and low job density.	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The development proposals and delivery rates are considered to be ambitious, but realistic. They have been informed by past performance, the current and future projected demand and	CPRE

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		the aims and ambitions of the Local Industrial Strategy. More details are provided in the Employment Land Topic Paper [05.01.04] .	
	Green Spaces		
Our Strat 28	Restricting growth in the south of GM will lead to employers and investors seeking opportunities outside of GM	The strategy does not seek to restrict growth in the south, the plan seeks to ensure that the southern area continues to make a considerable contribution to growth by making the most of its key assets as set out in JP Strat 9. No change required.	NPL Group
Our Strat 29	Addressing the north/south imbalance should not preclude delivering further significant development in the sustainable and commercially-attractive locations adjacent to Manchester Airport.	Manchester Airport is one of Greater Manchester's key assets and as such it is identified as a key growth location in the PfE. Policy JP-Strat 10, which seeks to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and its surroundings. No change required.	Bowdon Rugby Club Miri Roshni J M Gibney W R Halman C L Halman F I Carless Royal London Asset Management RLAM
Our Strat 30	Support aim of boosting northern competitiveness, but it should not be at the expense of green spaces which are important for public health.	PfE Chapter 8 'Greener Places' includes policies relating to green infrastructure and green spaces. Policies JP-G 6 and JP P- 7 set out how existing green space will be protected and the expected open space / green infrastructure that development will need to provide. More detailed policies on green space requirements for specific areas will be set out in District Local Plans. No change required.	Laure Ettrick
	Infrastructure		
Our Strat 31	Insufficient infrastructure to support the proposed development	A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary	Kevan Jones Gary Taylor

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	Climate Change		
Our Strat 32	The PfE Strategy needs to give full consideration to Climate Change. Housing / employment / transport policies need careful evaluation in terms of their climate change impacts.	Policy S 1 and Policy S 2 seek to tackle climate change and aim to deliver a carbon neutral Greater Manchester no later than 2038. The Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.02], evaluated all policies in terms of their climate change impacts. No change required.	Mark H Burton Janine Lawford Bernie Burns Friends of Carrington Moss
	Ecology		
Our Strat 33	The Strategy should refer to the ecological emergency as well as climate change	No change is proposed. These issues are covered by Objective 8, JP-Strat 13 and in policies within Chapter 8 'Greener Places'. The Plan should be read as a whole.	The Wildlife Trusts
Our Strat 34	Welcome preference for brownfield land, but the plan should also acknowledge that it can be an important habitat.	Policies in the Greener Places chapter including Policy JP-G6 and Policy JP G9 state the importance of urban green space. In addition, part of Biodiversity Net Gain, the importance of all habitats must be assessed prior to any development. No change required, issue covered elsewhere in the plan.	The Wildlife Trusts
	Heritage		
Our Strat 35	No direct reference to heritage in line with NPPF requirements. Provide paragraph on strategy for the historic environment. Wording provided for bullet point of paragraph 4.3	Chapter 4 'Strategy' is strategic and high level, specific references to the historic environment are made in policies JP-Strat-2, 3 and 5. Policy JP-P2 provides the overall strategic policy approach to the historic environment. No change required.	Historic England
	Other		
Our Strat 36	Create a more balanced set of sustainable goals. Need to emphasise the importance of GM's rural economy, environmental assets and reducing carbon emissions	The Strategy chapter is strategic and high level. These issues are covered elsewhere in the Plan. Specifically in Chapter 5 'Sustainable and Resilient Places', Chapter 8 'Greener Places' and Chapter 9 'Places for People'. The plan should be read as a whole. No change is considered necessary	Friends of Carrington Moss
Our Strat 37	Incorporate sufficient KPIs to measure the success of this Policy	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change required.	Friends of Carrington Moss

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Our Strat 38	Needs to be clear that district Local Plans should be aligned with the PfE strategy	Once adopted, PfE will be a part of the development plan. It not necessary or appropriate to determine the scope of Local Plans in PfE. That will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. No change considered necessary.	Highgrove Strategic Land PD Northern Steels PD Northern Trust Asset Management
Our Strat 39	Support reference to Stockport MBC and that they will continue to play a role in 'sustaining the economic competitiveness of the southern areas'	Noted	Gladman Developments

PfE 2021 Policy JP Strat-1 – Core Growth Area

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	Principle of Development		
Strat 1.1	Support Regional centre based on Manchester City Centre and Central Salford and the aim to make the most of key locations and assets, addressing disparities and making efficient use of land and resources	Support Noted	Prospect GB and Dobinetts Regeneration Landowners of Holme Valley Boys and Girls Club GM Gillian Boyle
Strat 1.2	Figure 4.2 of PfE should be amended to reflect the extent of the Core Growth Area, the addition of an indicative boundary of underlying shading of the full Core Growth Area and recognition for Trafford Park/City. Manchester Waters at Pomona Docks, Trafford Wharfside and Cornbrook Hub should be identified within the diagram and included within the supporting text at paragraph 4.26 as key residential development opportunity. Also Port Salford should be shown north of the Ship Canal and with the allocation it is larger than shown.	Figure 4.2, together with the other figures in Chapter 4 are illustrative only and therefore not designed to be prescriptive. The locations highlighted by darker shading are those that will have a strategic role in the Plan. It is not considered necessary to identify the outer boundary of this area or others elsewhere in Chapter 4. Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	Peel L&P Investments (North) Ltd
Strat 1.3	Trafford Park, including the Trafford City area, should be designated as a strategic mixed-use growth location within the Core Growth Area or preferably as a stand-alone strategic area in recognition of its existing economic role high level of investment, supportive uses, sustainable transport links(metro link extension and WIGIS) and planned new development	Trafford Park and the Trafford Centre and its environs are included within the Core Growth Area, as indicated in the supporting text for JP-Strat1. JP-J1 also indicates the roles of these areas. However, as this map is indicative and as the Plan needs to be read as a whole, no change is considered necessary to Figure 4.2.	Peel L&P Investments (North) Ltd Steven Renshaw
Strat 1.4	Growth in the Core Areas should be set in the context of surrounding towns and neighbourhoods and their role in its growth. A subsection should be added to give the full picture	PfE is a strategic plan and Chapter 4 sets the context for the whole PfE. JP Strat 12 sets out the Strategy for Town Centres. The Plan should be read as a whole and it will provide the framework for local plans. Therefore no change is considered necessary	Highgrove Strategic land Rowland Homes Ltd
Strat 1.5	Greater Manchester should be clearer in its growth focus and concentrate growth in northern areas as a priority. Consider renumbering policies to highlight this importance	The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. The order of the policies reflects the order of the Spatial Strategy and therefore no changes are considered necessary.	Shepherd Group

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Strat 1.6	Greater Manchester should focus on 'inclusive growth', allowing growth to be distributed more evenly across the 9 districts, with particular opportunities in town centres such as Bury, Rochdale and Oldham. Rather than heavily focusing on city centre brownfield sites"	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. Chapter 4 (4.1 – 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes are considered necessary	Landowners of Holme Valley Laura Charlotte Deborah Foulkes Jacqueline Charnock
	Infrastructure		
Strat 1.7	The public transport network will need to be overhauled if people are to stop using vehicles.	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] .	Mark Tyldesley
Strat 1.8	There needs to be a complete rethink of the main routes into Manchester. The M602 ends at Trafford Road in Salford leading to severe congestion. The A580 East Lancs Road ends at Salford University and then into Chapel Street with one lane available at best which causes congestion. These are just two examples of access to the City Centre being poor.	This matter is considered to be outside the scope of this plan, however, 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] . No change is considered necessary.	George Hardie Elizabeth J Glew
Strat 1.9	The Manchester Ship Canal has the potential to be a major link to Trafford Park and The Quays. Abandoned commercial sites along its course would be better utilized than proposed sites on already congested roads.	No change is considered necessary. The Manchester Ship Canal is identified as a key piece of transport infrastructure and one of Greater Manchester's assets. However, there are insufficient opportunities along the Ship Canal to meet the needs of the districts. The plan does however seek to recognise the impact of development on the existing network, as detailed in Policy JP-C7.	Lorraine Rogers
Strat 1.10	The SRN will need to accommodate increased economic growth in the Core Growth Area	No change is considered necessary. Infrastructure requirements are necessary to support new development. Full details of the transport evidence is available here: Transport Evidence . In particular, reference should be made to the Transport Locality Assessments for all the allocations and the Existing land supply and transport Technical note. These provide more details on the nature, scale and timing of infrastructure requirements on the SRN.	National Highways

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		The reports state that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site.	
Strat 1.11	Focusing growth at the Core Growth Area will help maximize accessibility of jobs and it is hoped that the access will be supported by more sustainable public transport modes. People will drive their cars rather than using public transport, cycling or walking and this should be discouraged	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]. Policies in PfE Chapter 10 set out details on how public transport, walking and cycling will be improved. No change is considered necessary.	Paul Roebuck
Strat 1.12	These homes need to be supported by necessary green spaces and social infrastructure. Policy should mention importance of Green spaces	A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Friends of Carrington Moss Susan Roberts Ian Smith
Strat 1.13	Support the principles in relation to siting employment and housing needs in sustainable locations. However it is considered the PfE Plan as drafted proposes a number of sites in unsustainable locations	All new development must meet policies in the PfE to ensure they are sustainable. This is covered in more detail in JP-S1 and is consistent with the requirements of NPPF. The Plan must be read as a whole. PfE has been subject to <u>Strategic Environment Assessment</u> , including an Integrated Assessment which has assessed the impact of the plan, including the allocations, against a number of objectives, including those relating to sustainability. No change is considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
	Brownfield		
Strat 1.14	Build on the many disused mills or old derelict buildings	The PfE seeks to promote the development of brownfield land within the urban area, in line with NPPF. PfE specifically mentions the opportunities offered by derelict and poorly used sites to help meet the housing supply in paragraphs 4.10, 7.4 and 7.8.	Elaine Abraham
	Economy / Employment		

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Strat 1.15	Manchester City Centre and the South of GM receives more investment than the North. Concerned that the bulk of investment will continue to be directed there.	No change is considered necessary. The economic strategy within PfE seeks to deliver inclusive growth by not only recognising on Greater Manchester's existing assets but also by identifying significant opportunities in the north of conurbation in line with the Spatial Strategy in Chapter 4	Landowners of Holme Valley
Strat 1.16	Need less employment office space now that more people work from home	The level of office development proposed in the Plan has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] . No change is considered necessary.	Friends of Carrington Moss Alan Gibson
Strat 1.17	Disagree that economic activity is GMs greatest strength. Consider its diversity is and policy should recognise a broader concept of growth and sustainable goals.	Other Policies in the Plan recognize the other strengths of GM. The Plan should be read as a whole. No change is considered necessary.	Friends of Carrington Moss
	Housing		
Strat 1.18	Supportive of development and focusing the growth of housing in the proposed core areas, but this approach must not be to the exclusion of investment that supports the growth of jobs, training and enterprise outside of the core areas	The Plan sets out a strategy for inclusive growth. The Strategic Policies 3-12 identify a number of areas for growth in addition to The Core Growth Area. No change is considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
Strat 1.19	Question the ability for this area to deliver 98,000 homes over the plan period	No change is considered necessary. Policy JP-Strat 1 states that sufficient land has been identified for almost 98,000 new homes, this is the potential land supply in the area. Details of the district housing targets are provided in Chapter 7 and details of the housing land supply can be found in the Housing Topic Paper [06.01.03]	Boys and Girls Club of GM Rowland Homes Highgrove Strategic land PD Northern Steels Rosedale Property Holdings Limited PD Northern Trust Asset Management
Strat 1.20	The supply of 98,000 dwellings is a serious overestimate and this would result in the loss of existing employment sites. Existing employment sites need protecting from redevelopment and there is a need to identify additional land outside of the urban area to meet housing needs	Policy JP-J 2 protects existing employment areas from redevelopment to other uses so that they remain competitive. The level of employment development proposed in the Plan has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] Policy JP-Strat 1 states that sufficient land has been identified for almost 98,000 new homes, this is the potential land supply in the area. Details of the district housing targets are provided in Chapter 7 and details of the housing	Taylor Wimpey

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		land supply can be found in the Housing Topic Paper [06.01.03] . No change is considered necessary.	
Strat 1.21	Majority of housing that has been built close to the city centre of Manchester are high rise rental properties, with very high rents that most young people working in the city cannot afford, pushing people away. More family homes need to be built in these areas	The Plans seeks to make efficient use of land and part of this strategy is building homes at high density. Whilst the Plan cannot fully prescribe the types of homes in these areas, Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. No change is considered necessary.	Lorraine Rogers
Strat 1.22	The supply of 98,000 dwellings is a serious overestimate and this would result in the loss of existing employment sites. Existing employment sites need protecting from redevelopment and there is a need to identify additional land outside of the urban area to meet housing needs	Policy JP-J 2 protects existing employment areas from redevelopment to other uses so that they remain competitive. The level of employment development proposed in the Plan has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] Policy JP-Strat 1 states that sufficient land has been identified for almost 98,000 new homes, this is the potential land supply in the area. Details of the district housing targets are provided in Chapter 7 and details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . No change is considered necessary.	Redrow Homes
Strat 1.23	It is not considered that the projection of 60% of PfE's housing provision being within this tiny area is accurate and or that it would fully meet housing needs.	Policy JP-Strat 1 states that sufficient land has been identified for almost 98,000 new homes, this is the potential land supply in the area. The Plans seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] No change is considered necessary.	Peel L&P Investments (North) Ltd
Strat 1.24	The over-reliance on housing in the Core Growth and Inner Areas should be reduced to ensure a diverse mix of housing types and tenure	No change is considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth and Inner Areas. The Housing Chapter (7) provide policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03]	Landowners of Holme Valley PD Northern Trust Asset Management
Strat 1.25	Support Policy and commitment to increase the supply of affordable housing in the Core Growth Area	Support noted.	GM Housing Providers
	Other		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 1.26	By redeveloping areas there is a risk of gentrification to existing communities and this needs to be taken into account	No change is considered necessary. Any redevelopment will need to be part of a detailed planning application and have regard to all the policies in PfE. Policies in Chapter 9 are particularly relevant to protect existing character.	Friends of the Earth
Strat 1.27	Incorporate a broader set of KPIs that will measure the success of all aspects of this Policy.	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss
Strat 1.28	The policy does not recognise the historic environment of the area that needs protecting. A new paragraph needs to be inserted into the policy to address this. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within the JP-Strat1 area. Specific references to the historic environment are made in policies JP-Strat-2, 3 and 5. JP-Strat-1 is the overarching policy for the Core Growth Area, therefore because reference is made to the historic environment in the relevant constituent policies in the wider area, no change is considered necessary. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01]	Historic England

PfE 2021 JP-Strat 2: City Centre

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 2.1	Concerns expressed about the loss of character in the city centre as a result of new development.	No change is considered necessary. Any redevelopment will need to be part of a detailed planning application and have regard to all the policies in PfE. Policies in Chapter 9 are particularly relevant to protect existing character	Louise Bolotin
Strat 2.2	Is the ordering of the spatial strategies in preference order or if they are each taken as equal? Further clarification on this is required.	The Policies in Chapter 4 are not sequential, instead, the order of the policies reflects the order of the Spatial Strategy. No changes are considered necessary.	Shepherd Group
	Economy / Employment		
Strat 2.3	Need to balance development in city centre with opportunities in surrounding local authority areas – risk of underutilised office accommodation, especially as technological change reduces the human admin workforce.	No change is considered necessary. The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. The level of office development proposed in the Plan has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03]	Jacqueline Charnock Roy Chapman
Strat 2.4	Not as much office space is needed as people now work more from home. Many offices are empty	The level of office development proposed in the Plan has been informed by the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03] . No change is considered necessary.	Orbit Investments (Properties) Ltd Lorraine Rogers Lynn Clegg E Bowles Save Greater Manchester's GreenBelt Alan Gibson Laura Charlotte Roy Chapman
Strat 2.5	Changing behavior of more online shopping needs to be reflected	This matter is considered to be appropriately dealt with in Policies JP-Strat 12 and JP-P4 and the relevant supporting text. No change is considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
Strat 2.6	More evidence is needed to justify that the identified housing supply can provide the scale and mix of housing needed and be deliverable,	It is acknowledged that there are viability challenges with some of the land supply identified, this is identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] . However, in line with NPPF, the Plan	Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	particularly when coupled with the finding of the supporting viability evidence,	seeks to promote the development of brownfield land within the urban area and to use land efficiently. This means that a significant amount of the land supply identified is in some of the more challenging area of the conurbation. As stated in the Housing Topic Paper [06.01.03] , to address this matter, an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. The Plan also seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . No change is considered necessary.	PD Northern Steels PD Northern Trust Asset Management
	Housing		
Strat 2.7	Concerns expressed that too many flats being built	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provide policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . No change is considered necessary.	Tim Eastwood Landowners of Holme Valley John Smith Laura Charlotte
Strat 2.8	Concern that the increased amount of development in this area will be mostly apartments, will not meet the mix of housing needs particularly affordable housing and will not be sustainable and the rates deliverable within plan period. Additional sources of supply across GM are needed	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] No change is considered necessary.	Peel L&P Investments (North) Ltd Highgrove Strategic land Landowners of Holme Valley
Strat 2.9	Consider the Policy should include requirements that focus housing provision on the needs of GM residents, particularly in relation to affordable homes. A proportion of new homes should be for social rent.	Overall the Plan meets the local housing need for the nine districts as set out in the standard methodology. The Housing Chapter (7) provides policy in relation to housing type, size, design and density but the precise mix will be determined in local plans. Policy	Lorraine Rogers Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. No change is considered necessary.	
Strat 2.10	Welcome and support the focus on the development within the city centre and the increase in the number of homes within this area from that proposed within the GMSF 2020	Noted	Rowland Homes SGMGB Susan Peat
Strat 2.11	Concerned that the supply relies on complex city centre brownfield sites with unknown landowners, leasehold arrangements and other issues and will not be deliverable within timescales envisaged.	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] . No change is considered necessary.	Landowners of Holme Valley
Strat 2.12	Question whether the number of homes specified for this area can actually be delivered in the Plan period	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] No change is considered necessary.	PD Northern Trust Asset Management Boys and Girls Club of GM Peel L&P Investments (North) Ltd
	Brownfield		
Strat 2.13	Support for brownfield development as a priority over greenfield/ Green Belt sites.	Support noted.	CPRE Prospect GB and Dobinetts Regeneration Landowners of Holme Valley Michelle Cardno Elizabeth Jane Glew
	Transport		
Strat 2.14	Identified that transport improvements (particularly public transport, but also roads) needed to support growth	Infrastructure requirements are necessary to support new development. Full details of the transport evidence is available here: Transport Evidence . In particular, reference should be made to the Transport Locality Assessments for all the allocations and the Existing land supply and transport Technical note. These provide more details on the nature, scale and timing of infrastructure requirements on the SRN.	National Highways Colin Waters

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The reports state that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. No change is considered necessary.	
Strat 2.15	There is an identified a need for increasing provision for cycling in the city centre.	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]. Policies with Chapter 10 address improvements in cycling infrastructure No change is considered necessary.	Friends of the Earth
Strat 2.16	Some skepticism raised that HS2 will be delivered.	The proposals in the Plan are not dependent on the delivery of HS2, instead it reflects its current status	E Bowles George Hardie
	Social Infrastructure		
Strat 2.17	The social infrastructure also needs to be considered for schools, doctors and dentists	A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary	Louise Bolotin
	Environmental		
Strat 2.18	Suggested that the city centre needs many more green spaces. Development needs to be supported by sufficient open space and Green Infrastructure to meet the needs of new development	A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P7 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary. More detailed policies on green spaces for specific areas will also be set out in District Local Plans	Friends of the Earth Michael Hullock Lorraine Rogers Paul Roebuck Friends Of the Earth Alan Gibson Laura Charlotte
	Other		
Strat 2.19	Concerns expressed about levels of crime; homelessness; and drug use in the city centre	Comments noted, however this matter is out of scope of the Plan	Susan Theodossiadis

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 2.20	Suggested that the city centre is being gentrified.	Any redevelopment will need to be part of a detailed planning application and have regard to all the policies in PfE. Policies in Chapter 9 are particularly relevant to protect existing character No change is considered necessary.	Friends of the Earth
Strat 2.21	Typo in changed plan period which needs changing	Noted	SGMGB
Strat 2.22	Recommend amending the supporting text as suggested to provide a more detailed explanation of a strategy for the historic environment for the City Centre The policy does not recognise the historic environment of the area that needs protecting. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	The supporting text of Policy JP-Strat 2 is considered to provide sufficient context for a strategic policy of this nature. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] . Therefore, no changes are considered necessary	Historic England

PfE 2021 JP-Strat 3: The Quays

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 3.1	Amount of development should be a minimum to allow for additional growth opportunities	The figures quoted in Chapter 4 represent the potential land identified for development, the minimum targets for employment and housing development are set out in Chapters 6 and 7. Therefore it is not considered necessary to make any change to the policy.	Peel L&P Investments (North) Ltd
Strat 3.2	A greater level of evidence is needed, consistent with guidance in the NPPG, to demonstrate the development numbers are deliverable in the Plan period	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] No change is considered necessary.	Highgrove Strategic Land Ltd Boys & Girls Club of GM
Strat 3.3	The area is of international importance – the first sentence of the policy should also make reference to The Quays being a main town centre	The international significance of the Quays is appropriately acknowledged in the Plan in particular in Strategic Objective 4 and JP-J1. Policy PfE-Strat 12 of the Publication PfE identifies that a new town centre is proposed for designation at Salford Quays in the Submission Salford Local Plan: Development Management Policies and Designations. As detailed in the PfE, should that designation become part of the Salford Local Plan, Salford Quays will be classed as a main town centre. No change is considered necessary.	Peel L&P Investments (North) Ltd
Strat 3.4	Support in principle the continued development of the area for a mix of uses	Support Noted	Peel L&P Investments (North) Ltd CPRE Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels PD Northern Trust Asset Management Boys & Girls Club of GM Stephanie Rogers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Housing		
Strat 3.5	Dwellings in the area are not affordable, and are mainly high rise flats that do not have gardens for children	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density. Whilst the Plan cannot fully prescribe the types of homes in these areas, the Housing Chapter (7) provides policy in relation to housing type, size, design and density but the precise mix will be determined in local plans. Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. No change is considered necessary.	Roy Chapman
	Employment & Economy		
Strat 3.6	MediaCityUK is an important economic asset which has significant economic potential	Importance of MediaCityUK is noted.	Peel L&P Investments (North) Ltd
Strat 3.7	Concerns about the accessibility of jobs for local people, the need for greater links to training opportunities, opportunities for small and community-led businesses, and jobs usually being low paid / zero hours contracts	The Quays will continue to develop as an economic location of national significance, characterised by a mix of uses which will be accessible to a wide range of people. Through other policies in the Plan, PfE seeks to ensure that the jobs at The Quays will be accessible through improved training opportunities (Policy JP-P5) and improved transport links (particularly JP-C1, C5 and C7). No change is considered necessary.	Carole Easey
	Brownfield		
Strat 3.8	The Quays are a good example of brownfield development as an alternative to Green Belt proposals	Comment noted.	CPRE Lorraine Rogers George Hardie Tim Eastwood
	Transport		
Strat 3.9	The areas has poor infrastructure. Public transport, cycling and walking should be prioritised; although the area is well served by the Metrolink it is however overcrowded, slow and expensive	The policy is clear that major improvements in accessibility by public transport, cycling and walking will be sought, including much better links to key rail stations and greater connectivity with the City Centre. Other policies within the plan seek to promote public transport, cycling and walking (in particular Policies JP-C2, C3 and C5). No change is considered necessary.	Lorraine Rogers George Hardie Tim Eastwood Paul Roebuck

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 3.10	The Quays is within close proximity to the M602 corridor and there is potential for the proposed development to impact the strategic route network	The PfE seeks to promote the development of brownfield land within the urban area, in line with NPPF. New infrastructure will be required to support new development as required. Full details of the transport evidence is available here: Transport Evidence . In particular, reference should be made to the Existing Land Supply and Transport Technical Note. These provide more details on the nature, scale and timing of infrastructure requirements on the SRN. No change is considered necessary.	National Highways
Strat 3.11	Lack of greenspaces and trees; any developments should be required to provide greenspaces which includes consideration of maintenance	The policy is clear that the high environmental quality of the Quays (including its public realm, green infrastructure, wildlife sites and heritage assets) will be protected and enhanced as its essential distinguishing features, and excellent, distinctive design will continue to be a priority. New Development will provide green spaces in line with Policy JP-G 6. No change is considered necessary.	Friends of the Earth Lorraine Rogers Paul Roebuck
	Flood Risk		
Strat 3.12	A large area of the location is within flood zone 2; it is essential that the policy reflects the need to ensure that high quality design is resilient to future climate change impacts	Ensuring that development is resilient to climate change is addressed elsewhere in the Plan, in particular within Chapter 5 and will be a matter for consideration at detailed planning stage. As the Plan should be read as a whole, no change is considered necessary. The PfE has been subject to a Strategic Flood Risk Assessment (SFRA) which assessed existing land supply sites which are located within the Quays [04.02.01]	Lynn Clegg
	Other		
Strat 3.13	The Quays has seen significant investment over many years. However, this does not yet seem to have positively impacted the surrounding area such as Ordsall	PfE is a strategic plan, regeneration within areas such as Ordsall is therefore a matter for Salford's Local Plan. No change is considered necessary.	Lauren Millward
Strat 3.14	This policy should be included in monitoring	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 JP Strat 4: Port Salford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 4.1	Support for the tri-modal facility	Support welcomed	Peel L&P (North) Irene Thomson Stephanie Rogers
Strat 4.2	Policy should refer to the full City Gateway proposal including the City of Salford Stadium, City Airport and Heliport. Figure 4.5 of PfE should be amended to reference this	City of Salford Stadium (AJ Bell) and City Airport and Heliport are not part of the Port Salford employment proposals and it is not considered to be appropriate to widen the area to also include these leisure uses. More information can be found in JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] No change is considered necessary.	Peel L&P (North)
	Employment		
Strat 4.3	Not clear what alternatives to reduce the area of this have been considered as regards what employment types are being developed on the site	With Phase 1 well underway, Port Salford is uniquely positioned having regard to road and rail links, as well as the waterways. More information can be found in JPA29 Port Salford Extension Allocation Topic Paper [10.07.71]	Friends of Carrington Moss
	Green Belt		
Strat 4.4	Object to development of Green Belt land with reference made to the role of the former golf course in separating Irlam and Eccles and its role as a 'green lung'	The case for exceptional circumstances is explained in the Green Belt Topic Paper and Case for Exceptional Circumstances Appendix 1 and Specifically for Port Salford Appendix 2 page [07.01.25] . The land between the proposed site allocation and Irlam which is currently designated as Green Belt is proposed to be retained as Green Belt in the PfE. For more detail see section 14 in JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] . No change is considered necessary.	Friends of the Earth CPRE Friends of Carrington Moss
	Transport		
Strat 4.5	Support for the proposal including the use of rail and water to move freight. The development of both Parkside East and Port Salford will support the creation of a network of rail freight interchanges, assisting in transferring the movement of freight from road to rail.	Support welcomed	St Helens Council
Strat 4.6	Question the demand for canal traffic without a robust assessment of how ships from Port of Liverpool will be shipped to Port Salford and	The Manchester Ship Canal is an established freight route. Port Salford is uniquely positioned to capture further opportunities to enable greater quantities	Mark H Burton Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	then onto roads, given that most freight in the UK is being transported by road and the site's proximity to the facilities at the Port of Liverpool	of freight to be moved by modes other than HGV with particular opportunities offered by the Canal. More detail can be found in section 10 JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] . No change is considered necessary.	
Strat 4.7	Proposal will exacerbate existing traffic problems / congestion on the local and strategic road network.	The Locality Assessment has looked at worst case scenario for tackling traffic problems without looking at modal shift. It sets out required transport infrastructure improvements necessary to be delivered to make the allocation deliverable. More detail can be found in section 10 JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] . No change is considered necessary.	National Highways Kelly Baker Paul Roebuck Colin Walters Roy Chapman
Strat 4.8	Highway improvements must be part of any scheme	The Locality Assessment has looked at worst case scenario for tackling traffic problems without looking at modal shift. It sets out required transport infrastructure improvements necessary to be delivered to make the allocation deliverable. More detail can be found in section 10 JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] No change is considered necessary.	Kelly Baker Paul Roebuck
Strat 4.9	There should be a new road bridge from Partington to Irlam	There are currently no firm plans for a road bridge from Partington to Irlam, No change is considered necessary.	Edward Beckmann Friends of the Earth
Strat 4.10	Welcome a Metrolink extension to the area	Noted	Roy Chapman Friends of Carrington Moss
Strat 4.11	More information is required about the impact on the Ship Canal as regards the current and future shipping use .(for example, road bridges across the ship canal will have to be lifted for ships to pass through	The Ship Canal has an existing function as an important freight route. Its operation follows appropriate regulations and procedures, which would continue to apply to its operation in this regard in the future. No change is considered necessary.	Friends of Carrington Moss
Strat 4.12	Policy should support more sustainable and potentially equal shares of water and rail based transport, and limit the volume of HGV movements.	Port Salford would enable greater quantities of freight to be moved by modes other than HGV with particular opportunities offered by the Canal. More detail can be found in section 10 JPA29 Port Salford Extension Allocation Topic Paper [10.07.71] No change is considered necessary.	Friends of the Earth Friends of Carrington Moss
Strat 4.13	The delivery of highway improvements cannot be funded entirely by Port Salford. Collaboration is required to unlock the potential of the site whilst addressing existing congestion in the local area and strategic highway network. Policy GM-Strat 4 should be amended to state that	Policy JP-Strat 4 is a high level strategic policy which is supported by a more detailed allocation policy (JPA 29). JPA29 sets out the policy requirements associated with the proposed development and is supported by an appropriate evidence base. More detail is set out in JPA29 Port Salford Extension	Peel L&P (North)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	"The development of Port Salford will be phased alongside the delivery of necessary highways infrastructure.	Allocation Topic Paper [10.07.71] It is not considered necessary for JP-Strat 4 policy to be amended as proposed given that the Plan is to be read as a whole. No change is considered necessary.	
	Environment		
Strat 4.14	Concerns relating to loss of agricultural land and loss of peat, habitats and wildlife including protected species and for the need for blue and green infrastructure along the canal	As stated in Paragraph 8.53, the Plan seeks to direct development away from valuable soils, but given the overall scale of development required, a limited amount of development is necessary on such land. However, as detailed in JPA29, where necessary, specific safeguards are included, such as those within criteria 11, 12, 13, 14 and 15. For more details see JPA29 Port Salford Extension Allocation Topic Paper [10.07.71]. No change is considered necessary.	CPRE Russell Wood Friends of Carrington Moss Friends of the Earth
	Air Quality		
Strat 4.15	Use of ship canal has potential to result in less vehicle movements and help improve air quality.	Noted	Friends of Carrington Moss
Strat 4.16	Development will have a negative impact on air quality including through increased traffic, rail and the use of ships	No change is considered necessary. Policy JP-Strat 4 is a high-level strategic policy which is supported by a more detailed allocation policy (JPA 29). JPA29 is supported by an appropriate evidence base in particular Section 21 of JPA29 Port Salford Extension Allocation Topic Paper [10.07.71]. Policy JP-S 6 of PfE identifies a comprehensive range of measures that will be taken to support improvements in air quality. Criterion 22 of the allocation policy requires development to "Implement an agreed strategy for dealing with its local air quality impacts." It will be important to consider issues of air quality again when the site comes forward as there may have been considerable changes in circumstances due to the effects of technology and policy. Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region.	CPRE Mark H Burton John A Holden Friends of the Earth
	Other		
Strat 4.17	Will result in noise and light pollution	No change is considered necessary. Policy JP-Strat 4 is a high-level strategic policy which is supported by a more detailed allocation policy (JPA 29) and policies in the emerging Salford Local Plan. It is considered that there will be adequate policy to address issues of light and noise. JPA29 is supported by an	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		appropriate evidence base in particular in section 22 JPA29 Port Salford Extension Allocation Topic Paper [10.07.71]	
Strat 4.18	Monitoring of the policy should be included	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 JP-Strat 5: Inner Areas

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 5.1	Do not see how existing communities will benefit from the proposed industrial development	Through other policies in the Plan, PfE seeks to ensure that the jobs at locations within the Inner Areas (and other places) will be accessible through improved training opportunities (Policy JP-P5) and improved transport links (particularly JP-C1, C5 and C7). No change is considered necessary.	Kelly Baker
Strat 5.2	Figures for amount of new development proposed should be provided, especially as policies covering the Quays and Central Manchester provide such figures	The fifth paragraph of JP-Strat 5 provides estimates in relation to the potential land identified for development, similar to other policies in Chapter 4. The minimum targets for employment and housing development are set out in Chapters 6 and 7. Therefore it is not considered necessary to make any change to the policy	Friends of the Earth
Strat 5.3	Support regeneration of the inner areas and the principle of accommodating high levels of development	Noted	Peel L&P (North) Martin Arthur
Strat 5.4	It is considered there are significant viability challenges in regenerating much of this land. Consider the policy is contrary to NPPF as evidence shows almost a third is unviable even when a 100% of the housing is market housing.	It is acknowledged that there are viability challenges with some of the land supply identified, this is in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] . However, in line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. This means that a significant amount of the land supply identified is in some of the more challenging area of the conurbation. As stated in the Housing Topic Paper [06.01.03] , an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. Additionally, not all sites will not be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites. Therefore, it is considered that the policy is in line with NPPF. No change is considered necessary.	Peel L&P (North)
Strat 5.5	Policy JP Strat 5 does not include a diagram of inner area proposals, in contrast to the other policies.	PfE Para 4.21 makes it clear that the areas identified in figure 4.1 do not have firm boundaries therefore the specific Scale of growth is not set out here. However Chapter 4 sets out the available land supply in the identified	Martin Arthur

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		strategic areas which contribute to the overall spatial strategy and Chapters six and seven of the PfE Plan set out the overall employment and housing targets with further land supply details being provided in The Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04] No change is considered necessary.	
Strat 5.6	Growth should be distributed more evenly across the nine districts, rather than focusing on inner areas of Manchester, Salford and Trafford which benefit from historic and recent investment	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes are considered necessary.	Landowners of Holme Valley
	Green Belt / Brownfield		
Strat 5.7	Opposition to development on Green Belt land and an indicated preference for development on Brownfield land or in inner city areas	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.	Save Greater Manchester Green Belt Elizabeth Jane Glew CPRE Karen Cornwall CPRE
Strat 5.8	Development should be focused on the existing urban areas particularly those in need of regeneration and more infrastructure	Around 90% of the new housing land is within the existing urban area. Regeneration is covered by other policies in the Plan, PfE seeks to ensure that the jobs at locations within the Inner Areas (and other places) will be accessible through improved training opportunities (Policy JP-P5) and improved transport links. A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, and JP- D2 which state 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. No change is considered necessary.	CPRE Janine Lawford Stephanie Rogers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 5.9	It is considered the Plan is inconsistent as although it sets out a focus to develop within the urban area and on brownfield sites it also proposes development on Green Belt. It is unclear what alternatives to developing on Green Belt have been considered	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. It is considered that a proportionate evidence base has been provided to support this approach. In particular, the exceptional circumstances for development have been provided in the Green Belt Topic paper [07.01.25] and alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.02.10] No change is considered necessary.	Save Greater Manchester Green Belt
	Infrastructure		
Strat 5.10	The M60 is too congested and the plan is not addressing transport infrastructure sufficiently	JP- Strat 5 is a high level policy, however, it is considered that a proportionate evidence base has been provided to support the Plan. Specifically in relation to transport matters, more information can be found here: Transport Evidence No change is considered necessary.	Stephen Woolley
Strat 5.11	Deprived areas need to have the necessary infrastructure including access to good schools	JP- Strat 5 is a high-level policy, however, a number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P7 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Stephen Woolley Paul Roebuck
Strat 5.12	Support the policy as it has the potential to provide a great deal of housing with less impact on transport infrastructure than commuting in from the affluent south.	Noted	Greater Manchester Housing Providers
Strat 5.13	Sustainable modes of transport should be encouraged.	Sustainable transport is encouraged within in the PfE Plan, particularly within policies JP-C1,JP-C 4 and JP-C 5. No change is considered necessary.	Martin Arthur
Strat 5.14	New development should be supported by new open space and green infrastructure to meet its needs	JP- Strat 5 is a high level policy, however, P- Strat 5 is a high-level policy, however, a number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-G6, JP-P1, JP-P7 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	
Strat 5.15	No significant impact to the SRN of this policy	Noted	National Highways
	Housing		
Strat 5.16	A greater level of evidence is needed on how the housing numbers are deliverable given that large amounts of the supply have been available for some time but not come forward. It is considered further sites in the short to medium term are needed until new markets are created.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently and part of this strategy is building homes at higher densities in urban areas. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] No change is considered necessary.	Hollins Strategic Land Rowland Homes PD Northern Steels PD Northern Trust Asset Management Peel L&P (North) Boys & Girls Club of GM
Strat 5.17	Concern that the housing proposed and on offer is not truly affordable and scepticism about the definition of affordable used in the plan.	Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. The definitions of affordable housing are in line with NPPF. No change is considered necessary.	Friends of the Earth Laura Charlotte
Strat 5.18	Either high-rise developments should be halted or priority should be given to more affordable options for residents.	The Plans seeks to make efficient use of land and part of this strategy is building homes at high density. Whilst the Plan cannot fully prescribe the types of homes in these areas, Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. No change is considered necessary.	Paul Roebuck Tim Eastwood
Strat 5.19	New development should be high-density affordable housing not social housing	Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. The definitions of affordable housing are in line with NPPF. No change is considered necessary.	Irene Thomson
Strat 5.20	Locate housing near employment opportunities to limit pollution and to encourage the diversity of residents no matter age, income, or disability to be part of those opportunities	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. The concentration of economic growth in the Core Growth Area enables people to live close to places of work and to access the jobs via sustainable modes of transport. No change is considered necessary.	Colin Walters

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 5.21	Importance of social housing should be emphasised as it supports more vulnerable communities than affordable housing. Affordable housing is not affordable for most people	Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford, including aiming to deliver at least 60% of the additional affordable homes for social or affordable rent in line with NPPF. The definitions of affordable housing are in line with NPPF. No change is considered necessary.	Lauren Millward Jacqueline Charnock
Strat 5.22	No need for more houses in the Inner city areas which are already densely populated and which lack green space	The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently which is in line with NPPF. Policies elsewhere in the Plan provide a framework to secure infrastructure, such as JP-G6, JP-P1, JP-P7, and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole. No change is considered necessary.	Alan Gibson
Strat 5.23	Demolish empty housing and re build on these sites	The Plan acknowledges that it will be important to make the most of existing housing stock and the districts are committed to reducing vacancies, however as detailed in the Strategic Housing Market Assessment [06.01.02] vacancy rates are below the national average. No change is considered necessary.	Karen Cornwall
	Environment		
Strat 5.24	Importance of supporting green infrastructure emphasised.	Noted	Friends of the Earth
Strat 5.25	The need to protect and enhance the natural environment, referred to in paragraph 3, should apply to all new development (and not just where a mix of uses is proposed) and should therefore appear earlier in the policy	It is considered that taking this policy as a whole, together with other policies in the Plan, provides sufficient guidance in relation to protecting and enhancing the natural environment within the Inner Areas. No change is considered necessary.	The Wildlife Trusts
	Other		
Strat 5.26	Incorrect Plan year in text	The Plan correctly states 2020-2037 to reflect the period of time covered by the land supply which supports the PfE2021 plan, it does not relate to the plan period. No change is considered necessary.	Save Greater Manchester Green Belt
Strat 5.27	Include monitoring of the Policy	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 Policy JP-Strat 6 Northern Areas

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 6.1	Agrees with the strategic focus on promoting the northern part of the Plan area.	Noted	See Appendix
Strat 6.2	Policy does not indicate the scale of growth which is expected across the Northern Areas and it will only be effective with sufficient developable land in the right places	PfE Para 4.21 makes it clear that the areas identified in figure 4.1 do not have firm boundaries. Policy JP-Strat 6 is the overarching, strategic policy for the area and therefore the specific scale of growth is not set out. However, details of the scale of growth in the constituent policies is defined and Chapters six and seven of the PfE Plan set out the overall employment and housing targets with further land supply details being provided in The Housing Topic Paper [06.01.03] and the Employment Land Topic Paper [05.01.04] . No change is considered necessary.	Morris Homes Redrow Homes Limited Persimmon Homes North West Morris Homes
Strat 6.3	It is considered there is an insufficient range of sites to achieve the policy ambition of attracting high income workers and more people to live in this area as none of the sites listed in PfE paragraph 4.48 are in Bolton or Wigan despite suitable land being available, including sites outside of the Green Belt	The list of sites in paragraph 4.48 is not an exhaustive list of sites within the northern areas. Paragraph 4.48 states that “other sites have the potential to attract skilled workers...”. It is therefore considered that a sufficient range of sites exists across the area as a whole. No change is considered necessary.	Seddon Homes GLP Persimmon Homes North West
Strat 6.4	It is unclear how this spatial strategy links with the growth policies of PfE. For example, Bolton appears to be devoid of any allocations for growth.	Bolton contributes to the overall strategy in that it meets at least 100% of its local housing need as calculated by the standard method together with three employment allocations. The Growth and Spatial Options Paper [02.01.10] and the Site Selection Background Paper [03.04.01] provide further information in relation to this matter. No change is considered necessary.	Morris Homes Peel L&P Investments (North) Ltd Seddon Homes GLP Taylor Wimpey
Strat 6.5	Question if any alternative approaches were considered to rebalancing the northern areas with the central and southern areas rather than M62 North East and Wigan-Bolton growth corridors	Alternative approaches to spatial growth were considered and are set out in more detail in the Growth and Spatial Options Paper [02.02.10] . No change is considered necessary.	Friends of the Earth
Strat 6.6	Is the ordering of the spatial strategies in preference order or if they are each taken as equal, further clarification on this is required.	The Policies in Chapter 4 are not sequential, instead, the order of the policies reflects the order of the Spatial Strategy. No changes are considered necessary.	Shepherd Group
Strat 6.7	Local Plans in the Northern areas should also recognise the ambition for boosting Northern competitiveness	As stated in para 1.58 of the PfE, the PfE will form part of the relevant authority’s development plan. Therefore, the policies within the plan, including those in	Highgrove Strategic Land Rowland Homes Bellway Homes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		relation to boosting the competitiveness of the north, will be applied as necessary No change is considered necessary.	EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management
Strat 6.8	Significant concerns that the ambition of this policy to boost competitiveness in the north is not applied to the policies for housing, employment and infrastructure	Policy JP-Strat 6 sets the ambition for growth for the northern areas. It is considered that the policies provided elsewhere reflect this ambition, particularly those in Chapters 6, 7 and 11. The later containing all the specific details for the allocations. No change is considered necessary.	BDW Trading Jones Homes (North West)
	Housing		
Strat 6.9	New housing in Bury is planned too far away from areas designated for employment, so is not in line with the Strategy	JP- Strat 6 sets out the strategic ambition for Growth for the northern areas. New housing in Bury will be a combination of both existing land supply and a number of allocations in Bury. As detailed in the Connected Places Chapter, this growth will be supported by an integrated transport network which will promote social inclusion, meet customer needs and provide access to jobs and other key services. No change is considered necessary.	Julie Halliwell Save Greater Manchester Green Belt Colin Walters
Strat 6.10	The redistribution of housing needs from the northern areas of Bury, Tameside and Wigan towards the Core Growth Area and not providing housing allocations in Bolton will not provide enough of the mix, type and quality of housing attractive to the market and needed in the north to diversify its current housing offer. This is at odds with boosting Northern Competitiveness and PfE should increase housing allocations in the northern parts of GM	As set out in PfE Strategy para 4.1-4.23 the central areas have a significant potential for growth given the existing economic activity and their existing sustainability. Maximising growth opportunities here is in line with NPPF 119 by making the most efficient use of land and prioritising existing brownfield land. The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. Collectively the northern districts meet around 100% of their local housing need as set out in the standard methodology. This reflects the Growth and Spatial Options Paper [02.01.10] . Furthermore it is considered sites in the northern areas have been identified in line with the site selection criteria. More information is available in the Site Selection Background paper [03.04.01] No change is considered necessary.	Redrow Homes (Lancashire) Peel L&P Investments (North) Bellway Homes GLP Trows LLP and BDW Trading Seddon Homes GLP BDW Trading Jones Homes (North West) Miller Homes Persimmon Homes North West Taylor Wimpey
Strat 6.11	Should state need for sites that are capable of delivering new family housing with a view to attracting more aspirational housing, affordable housing and other specialist housing requirements.	Policy JP-Strat 6 states that the mix, type, quality and range of residential offer will be increased in this area. JP-Strat 7 and 8 give further detail in relation to specific allocations. These Policies are further supplemented by those in Chapter 7. No change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes EON Plant PD Northern Steels

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			PD Northern Trust Asset Management Karen Cornwall Taylor Wimpey
Strat 6.12	Plans for luxury and executive housing will not meet the needs for proposed jobs in the area as most of Rochdale's industry is warehousing	Land supply in Rochdale is sufficiently diverse to provide a range of type, quality and mix of residential opportunities. Additionally, Rochdale's employment offer is wider than warehousing. A key element of the Strategy (JP-Strat 6) within the plan is to boost the competitiveness of the north of the conurbation, including Rochdale. This will be achieved through the delivery of the North East Growth Corridor (JP-Strat 7) which will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix. No change is considered necessary.	Trevor Thomas
	Green Belt / Brownfield		
Strat 6.13	Prioritise development on Brownfield land before releasing land from the Green Belt.	The PfE sets out a very 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 objectives of the Plan, a limited amount of development is required on land outside of the urban area on greenfield and/or Green Belt land. The release of greenfield and Green Belt land has, however been kept to a minimum with opportunities for regeneration of existing urban areas being maximised where possible. No change is considered necessary.	Friends of the Earth Kelly Baker Kim Scragg
Strat 6.14	Opposition to development on Green Belt land because it would lead to pressure on physical infrastructure and pollution, environmental impact of development and how it could affect global warming and could lead to urban sprawl.	PfE Policy JP-Strat 6 is a high-level strategic policy. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. It is considered that a proportionate evidence base has been provided to support this approach, including the impact on the Green Belt: Greener Places Evidence and the preparation of a Strategic Environment Assessment , including an Integrated Assessment which has assessed the impact of the plan against a	Paul Roebuck Aydin Sezen Mahmutoglu David Hawes Joanne Maffia Gillian Boyle Christopher Topping E Bowles Janine Lawford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		number of objectives, including those relating to physical infrastructure, pollution and the environment. No change is considered necessary.	
Strat 6.15	It is considered the Plan is inconsistent as although it sets out a focus to develop within the urban area and on brownfield sites it also proposes development on Green Belt. Clarity is needed to show how all brownfield land has been reviewed and its use maximised ahead of any consideration of Green Belt land.	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. It is considered that a proportionate evidence base has been provided to support this approach. In particular, the exceptional circumstances for development have been provided in the Green Belt Topic paper [07.01.25] Each district reviews its land supply annually, including optimising the potential from sites within the urban area. Further details of the land supply can be found in the existing land supply in the Housing Topic paper [06.01.03] and MappingGM: https://mappinggm.org.uk/pfe/ The nine districts will continue to work with site promoters of these sites in relation to securing their delivery.	Save Greater Manchester Green Belt Stephen Cluer
Strat 6.16	Require clarity on how it has been determined that the Green Belt sites proposed for development in this policy are termed “key locations”	The key locations referred to in JP Strat 6 are the North-East Growth Corridor (JP Strat 7) and the Wigan-Bolton Corridor (JP Strat 8). The sites within these locations have been identified in line with the site selection criteria. More information is available in the Site Selection Background paper [03.04.01] No change is considered necessary.	Save Greater Manchester Green Belt Stephen Cluer
Strat 6.17	The Policy should recognise the role that release of Green Belt sites can play towards meeting the objective of increasing the competitiveness of the northern area	Chapter 4 (4.1 - 4.23) summarises the Spatial Strategy and is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. The Plan should be read as a whole. No change is considered necessary.	Taylor Wimpey
	Employment		
Strat 6.18	The land releases for employment proposed in the northern area will be for warehousing and logistics which are low paid and unskilled and fail to justify release of Green Belt with creation of the high value jobs that the PfE claim.	As detailed in Chapter 6, the employment land offer will provide a range of employment opportunities, including warehousing and logistics which will help achieve the Local Industrial Strategy, further details can be found in the Employment Topic Paper [05.01.04]. The evidence to justify the release of	Gillian Boyle

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Green Belt is set out in the Green Belt Topic Paper [07.01.25] . No change is considered necessary.	
Strat 6.19	Question whether past modelling is the most effective means of working out employment land supply 10, 15 or 20 years down the line, especially when the employment market is undergoing such change with Covid and more people working from home the approach to the amount of employment land needed is questioned. More evidence is needed to understand the effects	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. In addition to this paper, one was also produced in relation to Covid-19 and Brexit: COVID-19 and Places for Everyone Growth Options [05.01.03] which are further explained in the Employment Topic Paper [05.01.04] . No change is considered necessary.	Friends of the Earth CPRE
	Infrastructure		
Strat 6.20	Policy would not result in any significant impact to the SRN	Noted	National Highways
Strat 6.21	New Infrastructure needs to be in place to support new development	Noted. A number of policies elsewhere in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary	Irene Thomson
Strat 6.22	Metrolink would need additional capacity to support the number of additional proposed households.	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] . No change is considered necessary.	Joanna Harland
Strat 6.23	The M62, M61 and M60 currently fail to cope with rush hour demand.	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] . No change is considered necessary.	Friends of the Earth
	Town Centres		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 6.24	Pleased to see an emphasis on the potential of town centres as part of boosting northern competitiveness through delivery of new housing and improved transport infrastructure.	Noted	Bellway Homes
Strat 6.25	We need to not only concentrate on the development of the town centres or the main towns like Bury we need to look at the surrounding smaller towns like Radcliffe, Ramsbottom and Tottington that are forgotten about when money is allocated	It is considered all towns are supported by PfE. Policy JP-P 5 sets out the hierarchy of Town Centre will be maintained and enhanced and in para 9.21 specific reference is made to smaller Town Centres being part of this hierarchy and that boundaries for these will be defined in Local Plans. The Plan should be read as a whole, therefore no change is considered necessary.	Middleton SC Limited RedleafVI (Ashton) Limited Partners
	Environment		
Strat 6.26	Concerns about the potential impact on air quality throughout the city-region.	PfE Policy JP-Strat 6 is a high-level strategic policy and PfE needs to be read as a whole. As set out in Policy JP-S 6 'Clean Air', Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality and where necessary specific allocations address this issue.	Patricia Cooke
Strat 6.27	Development must improve landscape, ecology and not have a negative effect on them or on local people	Chapter 8 sets out the policy framework for the protection and enhancement of our natural environment assets. Additionally, as necessary, policies in the Allocations (Chapter 11) make reference to the protection of specific assets of value. The Plan should be read as a whole, therefore no change is considered necessary	Faith Crompton
	Heritage		
Strat 6.28	The opportunity for heritage led regeneration is missed in this policy and particularly those heritage assets which are currently under-utilised and at risk should be more integral to the regeneration strategy for this area. Greater explanation of how the historic environment may be conserved and enhanced is needed. Wording is suggested to amend the policy. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within the JP-Strat 6 area. Additionally specific references are made in the relevant allocation policies to secure heritage led regeneration and/or opportunities to conserve and enhance the historic environment. The Plan should be read as a whole, therefore no change is considered necessary. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] . No change is considered necessary.	Historic England
Strat 6.29	As regards the natural and historic environment there is insufficient information on the improvements and how they will be achieved, and the nature and scale of mitigation and protection that developments will be required to deliver	PfE Policy JP-Strat 6 is a high-level strategic policy. Policies within Greener Places and JP-P2 provide the overall strategic policy approach to the natural and historic environments, respectively. These policies will apply to development within the JP-Strat 6 area. Additionally, specific references are made in the	Stephen Cluer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		relevant allocation policies, as appropriate, to mitigate impact on the natural and historic environments. No change is considered necessary.	
	Other		
Strat 6.30	Typographical error in relation to the wording of policies GM-Strat-7 and GM-Strat-8, which should now read JP-Strat-7 and JP-Strat-8	Noted.	Stephen Cluer
Strat 6.31	Policy JP-Strat 9 'Southern Areas' states that local neighbourhood character and environmental attractiveness will be protected. Similar wording should also be included in the Northern areas policy.	It is considered that taking Policy JP-Strat 6 as a whole, together with other policies in the Plan, provides sufficient guidance in relation to protecting neighbourhood character and environment attractiveness within the Northern Areas. Any redevelopment will need to be part of a detailed planning application and have regard to all the policies in PfE. Policies in Chapter 9 are particularly relevant to protect existing character. Therefore no change is considered necessary	Laura Etrick

PfE 2021 Policy JP-Strat 7 M62 North East Corridor

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 7.1	Support the policy in principle as the designated area is already well established as an employment location, and is unique in its ability to accommodate large scale urban extensions within Greater Manchester.	Noted	The Milne Trust Redrow Homes Countryside Properties Russell LDP Joe Heys Persimmon Homes North West
Strat 7.2	Object to the policy on the grounds that it will not be effective in delivering the full potential of the North East Growth Corridor due to the omission of land North of Langley Lane.	The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate. However, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. Sufficient land has been identified to meet both the employment and housing needs of the Plan area in line with the growth and spatial options and the site selection criteria. More information is available in the Growth and Spatial Options Paper [02.01.10] the Site Selection Background paper [03.04.01] Any sites not proposed are documented in the Site Selection Background paper Appendix 7 Summary of Planning assessments [03.04.09] with a reason why they are unsuitable. No change is considered necessary.	Persimmon Homes North West
Strat 7.3	Concerned that housing and employment development along the M62 are unsustainable and although the need for public transport is noted it will encourage road based travel.	All development will be in conformity with Objective 6 of the Plan which although seeks to focus new development within 800m of sustainable transport hubs. It also seeks expansion of our public transport network to facilitate new areas of sustainable and inclusive growth. Whilst the majority of new development will be in already sustainable locations, some development will be in places where improvements will be required. In such cases, the relevant allocation policies and topic papers detail this. No change is considered necessary.	Friends of the Earth
Strat 7.4	The policy fails to significantly increase residential offer in this location. The previous version of GMSF had draft allocation GM1.3. This should be reinstated for residential allocation	The Spatial Strategy is very clear that the more significant growth is at the core and this is considered to be appropriate however, it very clearly supports increased levels of growth in the northern areas to boost the competitiveness of northern Greater Manchester. Collectively the northern districts meet around	Seddon Homes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		100% of their local housing need as set out in the standard methodology. More information can be found in the Housing Topic paper [06.01.03] . No change is considered necessary.	
	Infrastructure		
Strat 7.5	Transport networks such as M60 and Metrolink are already at capacity and development will just add further issues. The smart motorway has not improved traffic congestion They are only useable if you live and work on their routes.	The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Tim Eastwood Christopher Russell Friends of the Earth Anne Isherwood E Bowles Rosaleen O Donnell
Strat 7.6	The fact there is a lack of public transport routes between certain areas, for example Littleborough and Milnrow, and along the M66 means the vast majority of commuters will drive and will lead to higher levels of pollution, accidents, delay and congestion	TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] No change is considered necessary.	Friends of the Earth National Highways Gillian Boyle Patricia Murfin
Strat 7.7	Improvements are needed to infrastructure. There are currently not enough places available at doctors, dentists and in schools.	A number of policies elsewhere in the Plan provide a policy framework to address this matter, such as Policies JP-P1, P5, P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Elaine Abraham Andrew Scanlon Patricia Murfin Simon Robertson
Strat 7.8	It is not clear how tram-train on the East Lancashire Railway extension to Castleton are realistic and deliverable and how freight rail will operate	As detailed in the Plan, for example at paragraph 11.25, it will be an expectation that opportunities to deliver a rail freight spur exploiting the existing heavy rail connections from the East Lancashire Railway line will be fully explored. The deliverability of these proposals will be considered as part of that assessment. No change is considered necessary.	Martin Arthur
Strat 7.9	Unclear how the improvements schemes on the SRN will provide the direct and cumulative network capacity to support the land use allocations	The Transport Locality Assessments, which support the allocations in this area provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.	
Strat 7.10	It is noted that the transport assessment and policy do not require a new junction in the vicinity of Birch so it is recommended that Picture 4.2 on page 63 is amended to insert the word ‘potential’ ahead of ‘new junction’.	Picture 4.2 is an indicative map and the allocation policy wording does not require the junction therefore no change is considered necessary.	Northern Gateway Development Vehicle LLP (c/o Helen Hartley)
Strat 7.11	Infrastructure should be required to facilitate development but must be flexible to ensure viability and should not be used to fix existing deficiencies	Agreed. However, as JP- Strat 7 is a high level policy, it does not specify all the required infrastructure for the allocations. It is considered that the relevant allocation policies detail the infrastructure required to facilitate the development and these are supported by viability appraisals. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. No change is considered necessary.	Russell LDP
	Employment		
Strat 7.12	The need for 3,330,000 sqm of new, accessible, industrial and warehousing employment land is considered to be too high and needs could be met without Green Belt release from making better use of the existing supply in the urban area. The methodology for estimating the existing supply is doubted.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119 (Policy JP- S 1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] No change is considered necessary.	
Strat 7.13	Scale of employment areas is unrealistic	The development proposals and delivery rates are considered to be ambitious, but realistic. They have been informed by past performance, the current and future projected demand and the aims and ambitions of the Local Industrial Strategy. More details are also provided in the Employment Land Topic Paper [05.01.04] . No change is considered necessary.	CPRE
Strat 7.14	Policy wording should be amended to allow more employment development by using the words "at least" rather than "almost"	The second paragraph of JP-Strat 7 provides estimates in relation to the potential land identified for development, similar to other policies in Chapter 4. The minimum targets for employment and housing development are set out in Chapters 6 and 7. Therefore it is not considered necessary to make any change to the policy	Russell LDP
Strat 7.15	The North-East Growth Corridor is a small geographic area and the need in the proposed development is not to meet actual need in the north of GM so could lead to an over-supply of warehousing. This would greatly reduce the competitive effectiveness of the Northern Gateway	As detailed at paragraph 4.49 of the Plan, the most significant proposed intervention in the northern areas is the North East Growth Corridor, focused on the M62 corridor from Junction 18 to Junction 21. The scale of this initiative is considered necessary in order to transform perceptions of, and opportunities within, the north of Greater Manchester. Given the scale of Northern Gateway, it will have the ability to provide economic opportunities across the whole of the sub-region. No change is considered necessary.	Paul Burns Stephen Cluer
Strat 7.16	Kingsway Business Park has been open for at least ten years and it still is not full. No guarantee that building more means economic growth.	The economic strategy within the PfE seeks to deliver inclusive growth by identifying a range of sites in a range of locations offering a mix of types of industry. The level and types of economic development proposed in the PfE have been identified in order to respond to the estimated employment land demand up to 2037. More details are provided in the Employment Land Topic Paper [05.01.04] No change is considered necessary.	Rosaleen O Donnell
Strat 7.17	Support the principle of promoting the opportunity for high quality, high productivity employment in this location	Noted	Highgrove Strategic Land Rowland Homes EON Plant PD Northern Steels PD Northern Trust Asset Management

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Countryside Properties (UK) Ltd Northern Gateway Development Vehicle LLP (c/o Helen Hartley) Persimmon Homes North West
	Green Belt		
Strat 7.18	The loss of Green Belt and quality farmland would cause pollution. Brownfield land should be used instead	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119 (Policy JP- S 1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Where mitigation is necessary to address adverse impacts, the relevant allocation policies and allocation topic papers for JP-A 1.1 Heywood/Pilsworth (Northern Gateway) [10.01.54] , JP-A 1.2 Simister and Bowlee (Northern Gateway [10.01.55] and JP A- 2 Stakehill. [10.01.56] detail this. No change is considered necessary.	Aydin Sezen Mahmutoglu Andrew Scanlon Friends of Carrington Moss
Strat 7.19	Removing land from the Green Belt could lead to urban sprawl.	Land proposed for removal from Green Belt has taken into account recommendations in the Green Belt assessment to provide effective boundaries to Green Belt to help prevent urban sprawl. Further details can be found in the relevant allocation topic papers for this JP-A 1.1 Heywood/Pilsworth (Northern Gateway) [10.01.54] , JP-A 1.2 Simister and Bowlee (Northern Gateway [10.01.55] and JP A- 2 Stakehill [10.01.56] and the evidence supporting Greener Places . No change is considered necessary.	Paul Roebuck Gillian Boyle
Strat 7.20	Green Belt development would negatively affect air quality. Milnrow records the highest reportable level of nitrogen dioxide, adding further cars would add to this problem.	PfE Policy JP-Strat 7 is a high-level strategic policy and PfE needs to be read as a whole. As set out in Policy JP-S 6 'Clean Air', Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. Where mitigation is necessary to address specific adverse impacts, the relevant allocation policies and allocation topic papers detail this JP-A 1.1 Heywood/Pilsworth (Northern Gateway) [10.01.54] , JP-A 1.2 Simister and Bowlee (Northern Gateway [10.01.55] and JP A- 2 Stakehill [10.01.56] No change is considered necessary.	Paul Roebuck Christopher Harper Karen Cornwall Friends of the Earth David Winkley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Environment		
Strat 7.21	Nature will be destroyed along with animals and their habitat.	The detailed allocation policies set out Natural Environment policy requirements in Chapter 8 sets out the policy framework for the protection and enhancement of our natural environment assets. Where mitigation is necessary to address specific adverse impacts, the relevant allocation policies and allocation topic this JP-A 1.1 Heywood/Pilsworth (Northern Gateway) [10.01.54] , JP-A 1.2 Simister and Bowlee (Northern Gateway [10.01.55] and JP A- 2 Stakehill. [10.01.56] No change is considered necessary.	James Clark E Bowles Gillian Boyle
	Other		
Strat 7.22	The scale of development being proposed will wholly alter the character of the local area	It is acknowledged that the North East Growth Corridor is of a transformative scale which is considered necessary in order to change perceptions of, and opportunities within, the north of Greater Manchester. However, policies elsewhere in the Plan, such as JP-P1, provide an appropriate framework to ensure that development is fully integrated, making a positive contribution rather than detracting from its coherence and character. No change is considered necessary.	CPRE
Strat 7.23	Incorporate a broader set of KPIs that will measure the success of all aspects of this Policy.	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 Policy JP-Strat 8 Wigan Bolton Growth Corridor

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 8.1	The development should work so long as all the objectives of the policy are implemented.	Support noted.	Terence Kelly Paul Williams
Strat 8.2	Support recognition that the lowland wetlands and mosslands form part of the Green Infrastructure network and for the growth corridor generally as the area has many deprived communities so it is particularly important to ensure local people benefit	Support noted.	Sheila Fisher
Strat 8.3	Support the 'corridor' as a strategic growth location and considers it to be a suitable and sustainable location for additional employment and housing	Support noted.	Peel L&P Highgrove Strategic Land Ltd Rowland Homes Murphy Group PD Northern Steels PD Northern Trust Asset Management
Strat 8.4	Support distribution of wealth to these areas, consider that more evidence is required to understand the impact of covid and Brexit	Support noted. 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] No change is considered necessary.	CPRE
Strat 8.5	Serious concerns with regards to the sustainability of development in this area particularly the M61 West of Bolton. Consider other sites are needed	The allocations in the Wigan / Bolton Growth Corridor have been identified through the PfE Site Selection process and they meet the overarching PfE Strategy and Objectives – see Site Selection Background Paper [03.04.01] . The allocations have also been subject to the PfE Sustainability Appraisal [02.01.02] . See also the Bolton and Wigan allocation topic papers. No change is considered necessary.	Jones Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 8.6	PfE proposes very limited growth in this area. Need clarity about where new houses in the corridor will be delivered. It is considered that there is significant potential for more homes and more land allocated	In addition to the allocations highlighted in JP-Strat 8, development sites have also been identified in the existing land supply, see Housing Topic Paper [06.01.03] and MappingGM: https://mappinggm.org.uk/pfe/ Both the allocations and the existing land supply provide sufficient land to meet Wigan and Bolton's housing and employment land needs. No change is considered necessary.	Peel L&P Highgrove Strategic Land Ltd Rowland Homes PD Northern Steels PD Northern Trust Asset Management BDW Trading
	Housing		
Strat 8.7	Plans for luxury homes will not meet local housing needs.	The housing land supply in Bolton and Wigan is sufficiently diverse to provide a range of type, quality and mix of residential opportunities. A mix of house types and tenures will be provided in accordance with PfE Policy JP- H3, which states that development across Greater Manchester should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. The overarching PfE Strategy seeks to increase the competitiveness of northern districts - providing a more diverse range of house types will therefore increase the attractiveness of these areas to highly paid, highly skilled workers. No change is considered necessary.	Karen Cornwall
Strat 8.8	A higher level of growth in Wigan and Bolton is required to reflect the strategy to create a regionally significant corridor of economic and residential development. There is significant additional potential for more homes and more land allocated	The targets set in these districts are considered consistent with the overall strategy and the aims and objectives of the plan. Sufficient land has been identified in both districts to meet these targets, therefore no change is necessary	Peel L&P Jennifer Antrobus Kelly Baker Ryan Beardwood Linda Booth Roy Chapman
Strat 8.9	Housing estates miles away from job opportunities are not supported	The Wigan Bolton Growth Corridor includes significant residential and employment development. Policy JP-Strat 8 requires new transport infrastructure which will provide improved links between residential areas and existing/new employment sites within the corridor. This includes significant improvements to public transport, such as improved rail and bus services, and a potential Wigan to Bolton Quality Bus Transit Corridor. No change is considered necessary.	Colin Walters
	Employment & Economy		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 8.10	Empty business units and vacant brownfield sites should be used first, and refurbished where necessary to meet modern business needs, before releasing land in the Green Belt for new units.	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. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] No change is considered necessary.	Roy Chapman David Hawes
Strat 8.11	Too many warehouses are being built and are proposed along the M6, M61 and M62 and will have a significant cumulative impact on the Green Belt. B8 warehousing has a large footprint and the high environmental impact should be considered.	The Green Belt Topic paper [07.01.25] assesses in Appendix 2 the Green Belt harm and mitigations required to address any environmental impact of allocations. Further detail can be found in 'Stage 2 GM Green Belt Study – Cumulative Assessment of Proposed 2020 GMSF Allocations' [07.01.07] and the 2021 addendum [07.01.23] in relation to effect of the proposed release on the strategic functioning of the Greater Manchester Green Belt. Further details justifying the specific allocations in this area can also be found in the relevant Allocation Topic Papers and IA. No change is considered necessary.	Friends of the Earth Sylvia Fewtrell
Strat 8.12	Highlighting logistics as a key driver of allocations will generate relatively few, poorly paid jobs and do little to revive the economy.	As detailed in Chapter 6, the employment land offer will provide a range of employment opportunities, including warehousing and logistics which will help achieve the Local Industrial Strategy, further details can be found in the Employment Topic Paper [05.01.04]. No change is considered necessary.	Friends of the Earth
Strat 8.13	Scale of employment areas is unrealistic	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper 'Employment Land Needs in Greater Manchester' [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. No change is considered necessary.	CPRE
	Green Belt		
Strat 8.14	Green Belt release in this area is supported, where sequentially preferable safeguarded land is not available	Support noted.	Sylvia Fewtrell Paul Williams
Strat 8.15	Given the need for housing growth in this area it seems unwise to extend the Green Belt in this area	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [7.01.25] provides appropriate justification for the Green Belt Additions. No change is considered necessary.	Hollins Strategic Land LLP
	Transport		
Strat 8.16	Leigh needs better connectivity and road capacity improvements to accommodate growth.	Policy GM-Strat 8 recognises the importance of sustainable transport and highlights that measures to improve the provision of bus services and to	Stephen Woolley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		increase the use of rail lines will be implemented within the Corridor. PfE Chapter 10 'Connected Places' relates to the provision of an integrated transport network across GM and the Transport Strategy 2040 [09.01.01] sets out a long term vision for sustainable transport. No change is considered necessary.	
Strat 8.17	New road between M6 and M61 much needed to reduce journey times and reduce traffic congestion on existing roads	Comment noted	Martin Arthur
Strat 8.18	The proposed transport links seem to gravitate towards Manchester on a North West to South East but nothing for North/South.	The transport proposals outlined in PfE, alongside those contained in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] will address the transport needs over the lifetime of the plan. No change is considered necessary.	Linus Mortlock
Strat 8.19	Improvement of road networks should also note the need to provide a safe fully accessible sustainable transport scheme from the outset – including active travel links to public transport hubs, such as railway stations.	Policy JP-Strat 8 is considered to provide sufficient strategic context for transport proposals and development in this area. In addition, Chapter 10 'Connected Places' also provides additional policy requirements in relation to sustainable transport. The plan should be read as a whole. No change is considered necessary.	Martin Arthur Ceridwen Haslam
Strat 8.20	The link road M6 J26 and M61 J5 will cause further traffic to an already over-burdened roundabout. Further information needed regarding the impact on the SRN and any required improvements.	The Transport Locality Assessments supporting the allocations in Bolton and Wigan provide the justification for the link road and other transport infrastructure improvements in this area – see Transport Locality Assessment Bolton [09.01.08 and 09.01.20] and Transport Locality Assessment Wigan [09.01.16 and 09.01.28]. No change is considered necessary.	Carole Dawson Graham Bond
Strat 8.21	The policy shows cognisance of highway impacts through its reference to the proposed Wigan Link Road, M6 J26 and M61 J5. However, further details of the potential impacts on the SRN and any required improvements are not provided	The Transport Evidence provides proportionate evidence on the nature, scale and timing of infrastructure requirements on the SRN. In particular, reference should be made to the Transport Locality Assessments for all the allocations and the Existing land supply and transport Technical note [09.01.04]. These provide more details on the nature, scale and timing of infrastructure requirements on the SRN. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The GMCA is also working alongside	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.	
Strat 8.22	Object to highways infrastructure proposed between M6 J6 and M61 J5	The Transport Locality Assessments supporting the allocations in Bolton and Wigan provide the justification for the highway and other transport infrastructure improvements in this area – see Transport Locality Assessment Bolton [09.01.08] and [09.01.20] and Transport Locality Assessment Wigan [09.01.16] and [09.01.28] . Further details on specific infrastructure proposals is in the relevant Allocation Topic Papers No change is considered necessary.	CPRE David Hawes
Strat 8.23	The purpose of the link road from the potential station to M61 J6 does not make sense	The Transport Locality Assessments supporting the allocations in Bolton and Wigan provide the justification for the link road and other transport infrastructure improvements in this area – see Transport Locality Assessment Bolton [09.01.08] and [09.01.20] and Transport Locality Assessment Wigan [09.01.16] and [09.01.28] . Further details on specific infrastructure proposals are in the relevant Allocation Topic Papers No change is considered necessary.	Paul Roebuck
Strat 8.24	No need for link road from J6 M61, when there is a proposed link road joining M61 to M58	The Transport Locality Assessments supporting the allocations in Bolton and Wigan provide the justification for the link road and other transport infrastructure improvements in this area – see Transport Locality Assessment Bolton [09.01.08] and [09.01.20] and Transport Locality Assessment Wigan [09.01.16] and [09.01.28] . Further details on specific infrastructure proposals is in the relevant Allocation Topic Papers. No change is considered necessary.	David Hawes
Strat 8.25	Need to improve outer travel and transport links around Greater Manchester's perimeter as well as into the city centre.	Policy JP-C1 seeks to deliver an integrated transport network across GM. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. See the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Terence Kelly
Strat 8.26	No need for trams from Wigan as there is an existing rail link to Bolton and on to Manchester.	The transport proposals outlined in PfE, alongside those contained in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year	David Hawes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Delivery Plan 2021-2026 [09.01.02] will address the transport needs over the lifetime of the plan. No change is considered necessary.	
Strat 8.27	Consider the delivery of new strategic highways infrastructure will enhance the accessibility of the area and create the conditions for growth	Noted.	Peel L&P
Strat 8.28	Strongly request that the proposed rail link to Skelmersdale is mentioned. The link could be mentioned in paragraph 4.55 of the justification text (wording provided)	Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	West Lancashire Borough Council
	Environmental		
Strat 8.29	The development will result in the loss of wildlife habitats, some of which are protected.	Policy JP-Strat 8 is a high level strategic policy and the plan should be read as a whole. JP-G 9 'A net enhancement of biodiversity and geodiversity' requires a net enhancement in biodiversity resources across the Plan – this includes protecting sites designated for this nature conservation. As appropriate, relevant allocations include specific policy requirements relating to wildlife habitats. No change is considered necessary.	Friends of the Earth
Strat 8.30	The greenspace at Hulton Park should remain free for everyone to enjoy.	The Hulton Park site is subject to an extant planning permission and that is reflected in the Plan. No change is considered necessary.	CPRE Kath Godfrey
	Heritage		
Strat 8.31	Hulton Park is a Grade II listed property and should be protected	The Hulton Park site is subject to an extant planning permission and that is reflected in the Plan.	Kath Godfrey
Strat 8.32	Consider the absence of any mention of the historic environment within this policy is inconsistent with NPPF. Policy wording is suggested to be added. The policy does not recognise the historic environment of the area that needs protecting. A new paragraph needs to be inserted into the policy to address this. Wording is suggested. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within the JP-Strat 8 area. Additionally specific references are made in the relevant allocation policies to secure heritage led regeneration and/or opportunities to conserve and enhance the historic environment. The Plan should be read as a whole, therefore no change is considered necessary. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England Historic England
	Other		
Strat 8.33	Investment in Wigan and Bolton town centres is welcome and important for their vitality and viability	Support noted.	Peel L&P

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 8.34	Nothing in proposals to benefit Wigan	A number of the transport proposals in the area will benefit Wigan, including the Wigan to Bolton Bus Transit Corridor. Additionally this policy will set the strategic framework for more detailed policies to come forward in Wigan via the Wigan Local Plan. No change is considered necessary.	Anne Isherwood
Strat 8.35	Support references in the policy to Hulton Park and the land near Royal Bolton Hospital. However recognition of the planning permission of Hulton Park should be made	The policy reference to Hulton Park is consistent with NPPF and the extant planning permission. Specific reference to the planning permission is not considered necessary.	Peel L&P
Strat 8.36	Current deprivation and infrastructure needs to be improved first	PfE Objective 5 seeks to 'reduce inequalities and improve prosperity' and there are various policies throughout the document which seek to address deprivation in GM and also provide new infrastructure. The Plan needs to be read as a whole. No change is considered necessary.	Janine Lawford
Strat 8.37	Question the ability to deliver 13,000 homes (average of 816 homes per year) over the plan period 2021-2037	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] . No change is considered necessary.	Highgrove Strategic Land Rowland Homes Ltd PD Northern Steels PD Norther Trust Asset Management
Strat 8.38	Incorporate a broader set of KPIs that will measure the success of all aspects of this Policy	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 Policy JP-Strat 9 Southern Areas

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
Strat 9.1	Agree with sustaining and enhancing the attractiveness of the southern areas	Noted.	HIMOR Group Manchester University Hospitals Aviva Life & Pensions UK Morland Capital Partners No.1 Ltd
Strat 9.2	Consider the policy does little to rebalance the focus away from southern and central areas, and as such is at conflict with JP-Strategy 6 Northern Areas.	PfE 2020, 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. It is considered that PfE Policy JP-Strat 9 reflects this. No change is considered necessary.	Peter Abel
Strat 9.3	Support the role of town centres and the policy should set out key locations in these that could support overall levels of growth and delivery	No change is considered necessary. Support noted. PfE Policy JP-Strat 12 'Main Town Centres' relates to town centres. Land within the town centres has also been identified in the existing employment and housing land supply. See Housing Topic Paper [06.01.03] and MappingGM: https://mappinggm.org.uk/pfe/	Mark Tyldesley Stephen Cluer
	Housing		
Strat 9.4	Oppose building of more housing in southern areas.	Housing sites have been identified within the southern areas to ensure there is sufficient land supply to meet the identified housing requirement (see Policy JP-H 1). The housing sites identified are consistent with the overarching PfE Spatial Strategy to boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. No change is considered necessary.	Tim Eastwood
Strat 9.5	Spread the housing need across the whole GM region and not just the north	The distribution of housing across GM is in accordance with the PfE Spatial Strategy, see PfE 2020, Chapter 4 (4.1 - 4.23). Housing sites have been identified across GM, not just the north. No change is considered necessary.	Janine Lawford
	Employment & Economy		
Strat 9.6	Southern areas are in a great position to attract economic prosperity.	Noted and this is reflected in the PfE Policy GM-Strat 9 'Southern Areas'. No change is considered necessary.	Aviva Life & Pensions UK

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 9.7	The role employment development can play in protecting and enhancing the economic competitiveness of the 'southern areas' and supporting the creation of new jobs for existing and new communities needs to be recognised so that it is in conformity with GM-Strat 6 of PfE	PfE Policy GM-Strat 9 'Southern Areas' references employment opportunities within the Southern Area, particularly the need to improve sustainable transport access to these locations. Significant employment land has been identified in the baseline land supply in this area, as well as within allocations JP-A 3.1 Medipark, JP-A 3.2 Timperley Wedge, JP-A 10 Global Logistics and JP-A 33 New Carrington. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No change is considered necessary.	Morland Capital Partners No.1 Ltd
	Green Belt		
Strat 9.8	Opposition to releasing land from the Green Belt.	PfE Policy JP-S1 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 housing and employment needs a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The case for exceptional circumstances is explained in the Green Belt Topic Paper [07.01.25] . No change is considered necessary.	Anne Isherwood Alan Gibson Edward Beckman Gaynor Kinsley Jeremy Williams
Strat 9.9	Concerned that Green Belt development will be preferred over more expensive redevelopment of older derelict buildings. Develop brownfield sites and reuse empty buildings before developing on Green Belt.	PfE Policy JP-S1 sets out a very 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 housing and employment needs a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. No change is considered necessary.	Roy Chapman
Strat 9.10	Distinctive local neighbourhood character and environmental attractiveness of the southern areas will not be protected and enhanced by building on Green Belt and peat moss	PfE Policy JP-Strat 9 states that the "distinctive local neighbourhood character ...of the southern areas will be protected and enhanced." It also states that development in these locations will be of good quality and design and will seek to improve the local character. Policy JP-P1 'Sustainable Places' also requires	Warburton Parish Council Lauren Waite-Hughes Paul Roebuck Pamela Neilan

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		development to respond to the natural environment. The individual allocation policies also include specific requirements relating to local neighbourhood character and environmental attractiveness – see JP-A 3.1 Medipark, JP-A 3.2 Timperley Wedge, JP-A 10 Global Logistics and JP-A 33 New Carrington. No change is considered necessary.	
Strat 9.11	Support the policy and selective release of Green Belt	Support noted	Gladman Developments Prospect GB and Dobinetts Regeneration
Strat 9.12	Consider the wording referring to new development at Carrington being on brownfield land is misleading. Most of the remaining land which does not have permission is Green Belt	Policy JP-A 33 New Carrington and the New Carrington Topic Paper [10.09.07] clearly set out the boundary of the New Carrington allocation and the proportion of the site which is brownfield and that which is currently in the Green Belt. The supporting text of JP-Strat 9 (para 4.64) is considered to be an accurate description of the New Carrington site, in that the allocation is focused around the former chemicals complex at Carrington. No change required.	Friends of Carrington Moss
	Brownfield		
Strat 9.13	The Policy does not provide certainty and clarity as to how sites have been assessed and identified, and then how the release of these sites corresponds with the focus on prioritising the re-use of brownfield land.	PfE Policy JP-S1 sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and these sites have been identified in the baseline land supply. However, given the scale of development required to meet the housing and employment land needs a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall Vision and Objectives of the plan The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the overall Vision and Objectives of the plan. No change is considered necessary.	Save Greater Manchester Green Belt Stephen Cluer
Strat 9.14	Consider that the reference to prioritising brownfield land is inconsistent with NPPF.	The PfE Plan states that there will be a strong emphasis on prioritising the re-use of brownfield land and is considered to be consistent with NPPF, in particular para 119. No change is considered necessary.	HIMOR Group
Strat 9.15	The policy should focus more on "deliverable and developable sites" rather than just a reliance on prioritising brownfield land. It is considered wording should be added to the policy to that effect.	The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently which is 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	Redrow Homes (Trafford)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		greenfield and/or Green Belt land. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes are considered necessary	
	Transport		
Strat 9.16	Development will increase road congestion.	PfE is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policies associated with this strategic growth area policy (see evidence relating to Chapter 10 'Connected Places'). Development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements. No change is considered necessary.	Laura Charlotte
Strat 9.17	Oppose M56 smart motorway scheme	The M56 Smart Motorway scheme is currently under construction and is beyond the scope of PfE. No change is considered necessary.	CPRE
Strat 9.18	Further details of the potential impacts on the SRN and any required improvements should be provided.	<p>The Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. We are also working alongside National Highways to prepare a further piece of work examining a “policy-</p>	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.	
	Social Infrastructure		
Strat 9.19	Social infrastructure such as health services and schools are already overstretched and development will increase pressure on them.	The development within the Southern Area will be supported by necessary infrastructure In line with Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. More detail can be found in allocation policies JP-A 3.1 Medipark, JP-A 3.2 Timperley Wedge, JP-A 10 Global Logistics and JP-A 33 New Carrington. No change is considered necessary.	Laura Charlotte
	Environment		
Strat 9.20	Wildlife habitat and agricultural land needs to be protected from development.	As stated in Paragraph 8.53, the Plan seeks to direct development away from valuable soils, but given the overall scale of development required, a limited amount of development is necessary on such land. The detailed allocation policies set out Natural Environment policy requirements – see JP-A 3.1 Medipark, JP-A 3.2 Timperley Wedge, JP-A 10 Global Logistics and JP-A 33 New Carrington. The NPPF also includes policy guidance for protected sites. No change is considered necessary.	Christopher Harper Warburton Parish Council
Strat 9.21	Consider the allocations and airport growth will promote more car use and have negative impacts on Climate Change targets.	The allocations in the Airport area are supported by Transport Locality Assessments which assess the impact of the development and identify a range of transport infrastructure improvements – including sustainable transport infrastructure. See the Transport Locality Assessments – for Trafford [09.01.07/09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] In addition the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. This relates to both development allocations and commercial sites, like Manchester Airport. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] .	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Manchester Airport Corporate Social Responsibility (CSR) Strategy also sets out ambitious commitments which will guide the sustainable development of the Airport – including how the Airport will achieve zero carbon status. No change is considered necessary.	
Strat 9.22	Policy should be revised to make it clear that development must actually protect and enhance the natural environment, as opposed to merely seeking to.	No change is considered necessary. Policy JP-Strat 9 is considered to be consistent with NPPF and, alongside the other PfE policies, provides an appropriate strategy to protect and enhance the natural environment which is a key objective of the plan and NPPF. No change is considered necessary.	The Wildlife Trust
Strat 9.23	The policy should refer to the existence of peat moss as an asset	PfE Policy JP-Strat 9 is a high-level strategic policy and is considered to be consistent with NPPF. PfE needs to be read as a whole. Policy JP-G 4 states that valuable lowland wetlands and mossland will be protected, enhanced and restored. No change is considered necessary.	Warburton Parish Council
	Air Quality		
Strat 9.24	Development will have a negative impact on air quality.	PfE Policy JP-Strat 9 is a high-level strategic policy and is considered to be consistent with NPPF. PfE needs to be read as a whole. As set out in Policy JP-S 6 'Clean Air', Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. No change is considered necessary.	Christopher Harper Friends of the Earth
	Other		
Strat 9.25	Expansion of Manchester Airport will increase air pollution, noise pollution, aviation fuel smells, traffic congestion, land taken up by airport parking and will contribute to climate change. Health concerns relating to new development near aircraft fumes.	Manchester Airport is the third busiest passenger airport in the UK and is a key factor in realising the wider growth agenda for the North. Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from airport operations by 2038. No change is considered necessary.	Friends of the Earth CPRE
Strat 9.26	Health concerns relating to new development near aircraft fumes	JP-S 6 'Clean Air', Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality and where necessary specific allocations address this issue. No change is considered necessary.	Colin Walters
Strat 9.27	Poverty is experienced by thousands of people throughout Greater Manchester, so why only mention it for the Southern Areas	Poverty is mentioned in many of the PfE policies and a key aim of the Plan is to reduce poverty. Objective 5 'Reduce inequalities and improve prosperity' and	Irene Thompson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Objective 10 'Promote the health and wellbeing of communities' directly relate to this (see PfE, page 39-42). No change is considered necessary.	
Strat 9.28	Policy JP-Strat 9 'Southern Areas' states that local neighbourhood character and environmental attractiveness will be protected. Similar wording should also be included in the Northern areas policy.	It is considered that taking Policy JP-Strat 6 as a whole, together with other policies in the Plan, provides sufficient guidance in relation to protecting neighbourhood character and environment attractiveness within the Northern Areas. Any redevelopment will need to be part of a detailed planning application and have regard to all the policies in PfE. Policies in Chapter 9 are particularly relevant to protect existing character. No change is considered necessary.	Laura Ettrick
Strat 9.29	Should include Tameside as this area needs improvements	Tameside is identified in PfE Policy JP-Strat 6 'Northern Areas'. Therefore no change is considered necessary.	Jacqueline Charnock
Strat 9.30	Consider reference should be made to New Carrington in the policy in the same way as Manchester Airport in recognition of its sub regional importance	Manchester Airport and Altrincham town centre are referred to in recognition of their status as existing assets in the PfE area. However, it is considered that the policy sufficiently recognises the potential of New Carrington through its reference to selective release of Green Belt in key locations and New Carrington is referenced in the Supporting Text, para 4.63 (pg 67). No change is considered necessary.	Peel Land and Property HIMOR Group
Strat 9.31	Incorporate a broader set of KPIs that will measure the success of all aspects of this Policy	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.	Friends of Carrington Moss
Strat 9.32	Wythenshawe Hospital is considered to be an economic driver and should be referenced as such in this policy	Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	Manchester University Hospitals NHS Foundation Trust

PfE 2021 Policy JP-Strat 10 Manchester Airport

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of development		
Strat 10.1	Support expressed for the policy identifying that continued expansion of the airport is required for further development in the city/ broader region; is vital for further travel opportunities; important for the provision of jobs; and helping to provide local authority investment funding/keeping council tax bills down.	Support for the policy noted.	Royal London Asset Management Aviva Life & Pensions UK Rowland Homes Ltd
Strat 10.2	The development around the airport and the allocations are not consistent with PfE objectives for carbon neutral development / climate change mitigation.	<p>Manchester Airport is considered to be one of the key assets in Greater Manchester and the Spatial Strategy seeks to capitalise on existing assets which genuinely distinguish Greater Manchester from its competitors in its approach to allocating land for development. This is set out in more detail in the Growth and Spatial Options Paper [02.01.10]. The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the overall Vision and Objectives of the plan.</p> <p>The PfE IA Scoping Report 2021 [02.01.01] noted the declaration of climate emergencies by the GMCA and districts, but concluded that no additions or changes were required to the IA objectives or criteria. The PfE policies have been tested assessed against the IA objectives and criteria, which includes climate change resilience, increased energy efficiency and reduced greenhouse gas emissions. No change is considered necessary.</p> <p>PfE Policy JP-Strat 10 is a high-level strategic policy and PfE needs to be read as a whole. Policy JP-S 2 'Carbon and Energy' sets an aim of delivering a carbon neutral GM no later than 2038. No change is considered necessary.</p>	Climate Action Bury Friends of the Earth Roderick Riesco CPRE Kim Scragg Andrew Scanton Woodford Neighbourhood Forum Alan Gibson
	Employment & Economy		
Strat 10.3	There is too much proposed office space at the airport. Unused office space across Manchester should be used instead.	The level of office development proposed in PfE has been informed by the Employment Land Needs in Greater Manchester [05.01.02] . Although the majority is within the Core Area other locations are also required. No change is considered necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 10.4	Additional provision should be made for logistics around Manchester Airport to meet the wider ambitions of GM and to meet the needs of occupiers wishing to locate close to Manchester Airport	As detailed in Chapter 6, the employment land offer will provide a range of employment opportunities, including warehousing and logistics which will help achieve the Local Industrial Strategy, further details can be found in the Employment Topic Paper [05.01.04] . No change is considered necessary.	Aviva Life & Pensions UK
	Green Belt		
Strat 10.5	Concerns about the proposed Green Belt deletions proposed with respect to allocations at the airport or nearby locations.	The case for exceptional circumstances is explained in the Green Belt Topic Paper and Case for Exceptional Circumstances [07.01.25] Appendix 1. See also Allocation topic papers for JP- A 3.1 Medipark [10.01.57] , JP-A 3.2 Timperley Wedge [10.01.58] and JP-A 10 Global Logistics [10.04.03] . No change is considered necessary.	The Wildlife Trust Lauren Waite-Hughes Michael Reeve Save Greater Manchester Green Belt Jeremy Williams Thomas Shrubsole Stephen Cluer Woodford Neighbourhood Forum Roy Chapman Laura Charlotte Roderick Riesco Martha Hughes
	Environment		
Strat 10.6	No evidence that plans have taken account of the requirements of the Climate Change Act as regards carbon release calculations associated with development on Green Belt land at Manchester Airport.	PfE Policy JP-Strat 10 is a high-level strategic policy and PfE needs to be read as a whole. The policy has been appraised through the IA which took into consideration these matters see PfE IA Scoping Report 2021 [02.01.01] and IA Main Report [02.01.02] . No change is considered necessary.	Susan Sollazzi The Wildlife Trusts
Strat 10.7	The policy is not supported by data about emissions that confirm what the airport emissions are today and what they are expected to be post-growth therefore how can the policy say growth at the airport is sustainable?	The carbon emissions associated with Manchester Airport are beyond the scope of this Plan. However, as stated in the Plan at paragraph 4.67, development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). No change is considered necessary.	Friends of Carrington Moss
Strat 10.8	Object to HS2 and the loss of irreplaceable habitat at Davenport Green Wood and Coroners Wood	HS2 is a national infrastructure project and therefore the details of the scheme are beyond the scope of this Plan. No change is considered necessary.	The Wildlife Trusts
	Transport		
Strat 10.9	Some scepticism over whether HS2 and Northern Powerhouse Rail will be delivered	HS2 is a national infrastructure project and the Government confirmed their commitment to delivering the HS2 Phase 2b Western Leg in the Integrated Rail	Kelly Baker Irene Thomson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Plan, published in November 2021. The completion of the route is anticipated to be towards the end of the PfE plan period. No change is considered necessary.	
Strat 10.10	Concerned about bus rapid transit on congested roads	The proposed bus rapid transit routes in the Manchester Airport area are part of a range of transport infrastructure proposals to serve the proposed developments sites and to improve sustainable transport access to the area. Further studies will be required to developed bus rapid transit schemes and to ensure they do not cause additional congestion. See the Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] . No change is considered necessary.	Paul Roebuck
Strat 10.11	No need for Metro tram/train on northern border	The Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] have identified transport infrastructure improvements for the area which are required to support the new development. No change is considered necessary.	David Hawes
Strat 10.12	Airport expansion is not needed now more people work from home	The plan reflects current planned growth at the Airport, it does not propose new levels of Growth. No change is considered necessary.	Friends of Carrington Moss Karen Cornwall Paul Roebuck
Strat 10.13	HS2 station location for the Airport is wrong, being too separated from the Airport	HS2 is a national infrastructure project and therefore is beyond the scope of this Plan. The representation of the HS2 route in Policy JP-Strat 10 reflects the status of the proposal at the PfE Regulation 19 stage. No change is considered necessary.	Martin Arthur
Strat 10.14	Concerned the highway improvements will not be enough to support the amount of new development proposed	The Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 / 09.01.22] have identified transport infrastructure improvements for the area which are required to support the new development. No change is considered necessary.	Martin Arthur Friends of Carrington Moss
Strat 10.15	The strategy may cause significant pressure on the M56 corridor, and the policy does not refer to the implications on the SRN.	The Transport Locality Assessments – for Trafford [09.01.07/ 09.01.19] and [09.01.15 / 09.01.27] and Manchester [09.01.07 / 09.01.19] and [09.01.10 /	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>09.01.22] provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 09.01.01 and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 09.01.02. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.</p>	
	Air Quality		
Strat 10.16	Any development near the airport needs to consider air quality.	PfE Policy JP-Strat 10 is a high-level strategic policy and PfE needs to be read as a whole. As set out in Policy JP-S 6 ‘Clean Air’, Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality and where necessary specific allocations address this issue. No change is considered necessary.	Colin Walters Lynn Clegg Manchester Airport Group
	Other		
Strat 10.17	Too much focus on air transport will not help Greater Manchester to become carbon neutral.	Development at Manchester Airport will be in line with Manchester Airport Group’s Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038.	CPRE The Wildlife Trust Craig Sevant Alan Gibson Sarah Burlinson Craig Sevant

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The carbon emissions associated with Manchester Airport are beyond the scope of this Plan. No change is considered necessary.	
Strat 10.18	Concerns about increasing noise pollution from the proposed Manchester Airport expansion plans.	The plan reflects current planned growth at the Airport, it does not propose new levels of Growth. No change is considered necessary.	Woodford Neighbourhood Forum
Strat 10.19	Concerns expressed that car parking charges at Manchester Airport, including for drop-off and pick-up are unpopular	Car parking charges for Manchester Airport are managed by Manchester Airports Group (MAG) and are therefore beyond the scope of this Plan. No change is considered necessary.	Tim Eastwood
Strat 10.20	Needs to be greater clarity in relation to how anticipated growth from Manchester Airport, Airport City and the HS2 Airport connection is likely to impact on development needs and environmental impacts in Cheshire East	Through cross boundary collaboration, the relevant PfE districts and TfGM have been working with Cheshire East Council to ensure that development proposed is cognisant of developments in Cheshire East. As a neighbouring authority and duty to cooperate body Cheshire East Council have signed the relevant sections of the PfE Statement of Common Ground reflecting this. No change is considered necessary.	Highgrove Strategic Land Ltd
Strat 10.21	Scope to allocate additional land south of Trafford for example housing north of the River Bollin. These alternatives have not been sufficiently considered	All call for sites have been assessed through the PfE Site Selection methodology, including those in the River Bollin area. See the Site Selection Background Paper [03.04.01.] No change is considered necessary.	Rowland Homes Ltd PD Northern Steels PD Northern Trust Asset Management
Strat 10.22	Incorporate a broader set of KPIs that will measure the success of all aspects of this Policy	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss
Strat 10.23	Request that policy makes direct reference to the future regeneration and investment in Wythenshawe Hospital as a key benefit of enhanced connections to this part of Greater Manchester. Suggested wording as amendment	Wythenshawe Hospital is an important location within the wider Southern Area, however it is not necessary to identify it within the Manchester Airport policy. Wythenshawe Hospital is identified in the housing and employment land supply and referenced in JP-A 3.1 Medipark where there is a significant opportunity to link to the Medipark allocation. No change is considered necessary.	Manchester University Hospitals NHS

PfE 2021 Policy JP-Strat 11 New Carrington

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of development		
Strat 11.1	General concern that the scale of the site, across three different communities, will lead to a loss of local identity	Policy JP-Strat 11 states that new development will be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character. See also JP-A 33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan [10.09.06] for information on the overarching principles for how the design and layout of the development will integrate into existing communities. No change is considered necessary.	Edward Beckmann Warburton Parish Council
Strat 11.2	Welcome the inclusion of New Carrington under Policy GM-Strat 11 as one of the key strategic locations identified	Noted	Air Products BR United Utilities Property Services Peel Land and Property Highgrove Strategic Land Rowland Homes Redrow Homes (Trafford) PD Northern Steels HIMOR Group PD Northern Trust Asset Management
Strat 11.3	No acknowledgement of the importance that existing employment uses within the New Carrington area are a vital component of the strategic objective to sustain Southern Competitiveness and so any new development will need will to ensure that the continuing operational needs of existing businesses are not compromised in any way. Particularly in respect of the effects of noise and whether appropriate mitigation can be delivered by proposed new housing	Policy JP-Strat 11 is a high level, strategic policy for the Carrington area and reference is therefore made to the overall 'employment area' in Carrington. Policy JP-A 33 provides more detail and, in relation to employment uses, requires the incorporation of appropriate noise and air quality mitigation in relation to existing and new businesses, facilities and employment uses. Further information is in JP-A 33 New Carrington Allocation Topic Paper [10.09.07] . No change is considered necessary.	Air Products BR
Strat 11.4	Concerned about delivery on the site given lack of substantial housing or employment delivery despite Core Strategy designation. Delivery should be monitored and additional sites allocated if development is not forthcoming	Part of the Carrington area was identified in Policy SL5 of the Trafford Core Strategy 2012, this location was focused on the brownfield land area of the previous industrial uses. The PfE New Carrington allocation extends significantly	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>beyond this area and proposes additional housing and employment development.</p> <p>Since the adoption of the Core Strategy several housing and employment sites are now being delivered within the SL5 area. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p> <p>The PfE New Carrington Masterplan considered the likely delivery rates for a site of this scale and the figures included in PfE are considered to be realistic and deliverable. See JP- A 33 New Carrington Allocation Topic Paper [10.09.07] Section E 'Deliverability' and New Carrington Masterplan [10.09.06] Section 5.8 'Development Phasing'. No change is considered necessary.</p>	PD Northern Trust Asset Management
	Housing		
Strat 11.5	There is a need for affordable housing which is suitable for both families and single individuals. Concern that 'affordable' housing is not genuinely affordable to many people.	<p>Further detail about the type of housing which will be provided at New Carrington is set out in Policy JP-A 33. This requires development to provide a minimum of 15% affordable housing across New Carrington, although it is considered that some areas could deliver significantly in excess of this and further information will be provided as part of future Masterplanning / the Trafford Local Plan. Policy JP-A 33 also requires development to deliver a range of house types, sizes, layouts and tenures through a place-led approach based on each of the Character Areas identified in the New Carrington Masterplan. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07]. No change is considered necessary.</p>	Janine Lawford Edward Beckmann
	Employment & Economy		
Strat 11.6	The area designated for employment use could be further maximised to accommodate additional employment land, such as land at Manchester Road which could meet the shortfall identified in the B8 supply	<p>Enough land has been identified to meet the employment land needs and has been distributed in line with the spatial strategy. Insufficient evidence exists to demonstrate that additional deliverable land exists within the wider area of Carrington. No change is considered necessary.</p>	Peel Land and Property
	Brownfield		
Strat 11.7	Support brownfield development within the New Carrington allocation.	Support noted	Friends of the Earth Irene Thompson
Strat 11.8	Housing should be delivered on the brownfield land only, this would negate the need for Green Belt release	<p>The PfE sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (see JP-S 1 'Sustainable Development'). Much of the brownfield land at Carrington is</p>	Tim Eastwood

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>restricted by HSE COMAH zones and residential uses would not be appropriate in these areas (see JP-A 33 New Carrington Allocation Topic Paper [10.09.07], section 13.3 Hazardous Installations).</p> <p>Given the above and the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. No change is considered necessary.</p>	
	Transport		
Strat 11.9	Significant concern about existing congestion issues on the road network, particularly on the A6144 through Carrington	<p>Policy JP-Strat 11 states that development will need to be supported by major investment in transport infrastructure. This includes the proposed Carrington Relief Road which will provide additional capacity and ease congestion on the existing A6144. Further detail on the transport infrastructure requirements is in Policy JP-A 33 New Carrington and the New Carrington Transport Locality Assessment [09.01.15] and [09.01.27].</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. No change is considered necessary.</p>	Paul Roebuck Stephen Cluer
Strat 11.10	Limited information about the transport infrastructure needed to deliver the New Carrington site	<p>Policy JP-Strat 11 states that development will need to be supported by major investment in transport infrastructure. Further detail on the transport infrastructure requirements is in Policy JP-A 33 New Carrington and the New Carrington Transport Locality Assessment [09.01.15] and [09.01.27]. The reports state that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. No change is considered necessary.</p>	Martin Arthur Save Greater Manchester Green Belt
Strat 11.11	Concern about the proposed Carrington Relief Road and the lack of consultation on this proposal	<p>The Carrington Relief Road is a longstanding proposal for the Carrington area, which has been identified in previous Trafford Local Plan documents, including the Core Strategy, 2012. The route is identified as an infrastructure requirement</p>	Warburton Parish Council

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27].</p> <p>Although outside of PfE, a consultation was held on route options in 2021 and a planning application is expected in 2022. No change is considered necessary.</p>	
Strat 11.12	The policy has implications for the SRN, and will potentially require improvements at M60 J8.	<p>The Transport Locality Assessments – for New Carrington [09.01.15] and [09.01.27] provide detailed information on the nature, scale and timing of infrastructure requirements on the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.</p>	National Highways
Strat 11.13	The benefits of the Carrington Relief Road are understood. However, disagree that this will be needed in order to bring forward development on land at Warburton Lane. Therefore Policy should be amended to state that development can come forward where it can be demonstrated that existing infrastructure has sufficient capacity.	<p>GM -Strat 11 is a high level policy and further detail on the site requirements for specific development parcels is set out in the Policy JP-A 33 New Carrington and supporting documents.</p> <p>See JP-A 33 New Carrington Allocation Topic Paper [10.09.07] – section 10 Transport. No change is considered necessary.</p>	Redrow Homes (Trafford)
	Physical Infrastructure & Utilities		
Strat 11.14	Significant COMAH and gas pipe constraints across the site which will restrict development	GM -Strat 11 is a high level policy and further detail on the site constraints and development parcels is set out in the Policy JP-A 33 New Carrington and supporting documents.	Air Products BR

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The various COMAH and gas pipe constraints have been taken into account in the New Carrington Masterplan and this has informed the proposed development quantum for these areas. See New Carrington Masterplan [10.09.06] and JP-A 33 New Carrington Allocation Topic Paper [10.09.07] – section 13.3 Hazardous Installations and section 28 Indicative Masterplan. No change is considered necessary.	
Strat 11.15	Concerned that a large-scale allocation at New Carrington will, alter the character of the locality.	JP-Strat 11 is a high level policy. Further detail to ensure the allocation recognises the distinct characteristics of existing areas is set out in criteria 6 of Policy JP-A 33 New Carrington and in supporting documents, including the New Carrington Masterplan [10.09.06]. No change is considered necessary.	Save Greater Manchester Green Belt
	Social Infrastructure		
Strat 11.16	Many schools are already oversubscribed, particularly at primary level	JP-Strat 11 is a high level policy and therefore does not identify specific social infrastructure requirements, such as school places. Further detail is set out in Policy JP-A 33 New Carrington which requires development to ‘provide and contribute to the provision of additional primary and secondary school places’. See the New Carrington Allocation Topic Paper [10.09.07] - section 24 Education. No change is considered necessary.	Christopher Harper Karen Cornwall Thomas Shrubsole Warburton Parish Council
	Environment		
Strat 11.17	Significant concern about the loss of wildlife habitats	JP-Strat 11 is a high level policy and therefore does not specify policy protections for wildlife habitats, however PfE should be read as a whole. Policies in Chapter 8 and Policy JP-A 33 New Carrington include a number of policy protections for the natural environment. Further information is also in the New Carrington Allocation Topic Paper [10.09.07] – section 19 Ecological/Biodiversity Assessment. No change is considered necessary.	Friends of Carrington Moss The Wildlife Trusts Thomas Shrubsole Warburton Parish Council
Strat 11.18	Object to the loss of mossland, This should be retained for its biodiversity value and as a carbon store. The conservation of organic soils will also help to reduce carbon emissions	The proposed New Carrington allocation balances positive and harmful impacts. The benefits include providing family and affordable homes in a strategically important location which could deliver significant regeneration benefits to the area. The harmful impacts of this development are considered to be offset by the provision of a significant area of green space within the allocation – this relates to both the Green Belt through the centre of the site, as well as the strategic green spaces at Sale West. Policy JP-A 33 (criterion 33) requires the restoration and creation of wetland areas within the site.	Friends of the Earth Friends of Carrington Moss The Wildlife Trusts Warburton Parish Council CPRE

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Further work will be required to assess the depth and extent of any peat within the site, to ensure that the most valuable areas are retained as part of the wider green infrastructure strategy. The findings of this will then inform the detailed Masterplan. Trafford Council will continue to work with partners including the Lancashire Wildlife Trust and Natural England to look at opportunities at New Carrington in relation to the GM Wetlands Nature Improvement Area.</p> <p>Policy JP-G4 outlines the importance of mossland for their habitats and wider landscape. There is a strong emphasis in the Plan on their retention and improvement. The Plan as proposed is therefore considered sound and no change is necessary.</p>	
Strat 11.19	The site offers an opportunity for biodiversity net gain	Policy JP-G 9 seeks a net enhancement of biodiversity resources across the plan as a whole. The Carrington area is also identified in Policy JP-G2 as a Green Infrastructure opportunity area. Policy JP-A 33 New Carrington also requires development to deliver a clear and measurable net gain in biodiversity. No change is considered necessary.	Friends of the Earth Friends of Carrington Moss Stephen Cluer
	Other		
Strat 11.20	The Carrington site is considered to be an unsustainable and unsuitable location and fails to comply with NPPF as it requires major investment to ensure its connected to the rest of GM	Whilst the Carrington area is currently a less sustainable development location, the development and associated mitigations required in PfE will ensure that Carrington is a sustainable location. See Policy JP-A 33 New Carrington. This is consistent with NPPF para 73. The Plan must be read as a whole. No change is considered necessary.	Save Greater Manchester Green Belt (SGMGB)
Strat 11.21	Policy should be monitored	The monitoring of the PfE is more overarching rather than focusing on specific sites. However, there are KPIs/Targets related to Strat 11 such as 'Sustain the competitiveness of the employment and housing offer in our part of the south of conurbation'. No change is considered necessary.	Friends of Carrington Moss

PfE 2021 Policy JP-Strat 12: Main Town Centres

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of development		
Strat 12.1	Towns need to become distinctive, local and unique places. Investment is required to allow town centres to compete and they need revitalising, not just redeveloping.	PfE Policy JP-Strat 12 is a high-level strategic policy. Policy JP-P 4 supports the role of the main town centres as local economic drivers that will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Other policies in the Plan will ensure development will be carefully managed to ensure that the local distinctiveness of each main town centre is retained and enhanced. Opportunities will also be taken to protect and enhance natural and historic assets in the town centres. Additionally further guidance will be provided as appropriate in district local plans. No change is considered necessary.	Andrew Mair Joanna Harland E Bowles Roy Chapman Kelly Baker Irene Thompson CPRE Janine Lawford
Strat 12.2	Town centres in the city-region are overdeveloped and as a result, congestion is becoming an issue.	The PfE ensures that new development will be supported by necessary infrastructure, including the provision of appropriate sustainable travel opportunities. 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] . No change is considered necessary.	Mike O'Brien Tim Eastwood Jacqueline Charnock
Strat 12.3	Essential to develop all brownfield sites in town centres including redundant shops etc for housing to reduce travelling from out of town areas	The PfE sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (see JP-S 1 ‘Sustainable Development’). The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently which is in line with NPPF. No change is considered necessary.	E Bowles David Hawes
Strat 12.4	Supportive of residential development alongside main town centre uses	Noted	Bolton CAMRA
	Transport		
Strat 12.5	Improve transport links to the town centres rather than surround them with development on green belt sites. Brownfield building only	PfE Policy JP-Strat 12 is a high-level strategic policy. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant	Susan Theodossiadis

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport of which includes improving transport links within and to our town centres. 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]. No change is considered necessary.</p>	
Strat 12.6	Car parking in Town centres is too expensive	Comments noted, however this matter is out of scope of the Plan. No change is considered necessary.	Maureen Buttle
Strat 12.7	This policy has the capacity to alleviate the impacts of developments on the SRN. However, given that some of these main town centres are in close proximity to the SRN it should acknowledge potential to increase traffic pressure at specific junctions affected.	<p>In accordance with NPPF, the Plan seeks to make efficient use of land and part of this strategy is capitalising on existing urban potential in our town centres. Any impact of proposals on the SRN will be considered as part of the planning application process, and through strategic modelling.</p> <p>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]. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.</p>	National Highways
	Housing		
Strat 12.8	Support for the policy and additional residential units in the main town centres.	Support noted.	<p>Friends of the Earth</p> <p>CPRE</p> <p>Peter Thompson</p> <p>EON Plant Ltd</p> <p>PD Northern Steels</p> <p>PD Northern Trust Asset Management</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 12.9	More terraced/town houses not just apartments are needed	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly in places such as our town centres. However, policies JP-H3 and JP-H4 relate to housing type, size, design and density which will ensure a range of house types are delivered, whilst making the most efficient use of land. The precise mix will be determined in district Local Plans. No change is considered necessary.	Lauren Waite-Hughes
Strat 12.10	Concerned that a greater residential role may not result in the same amount of travel as previously, thus leading to a reduction in public transport services,	Consistent with NPPF the Plan seeks to make efficient use of land and part of this strategy is capitalising on existing urban potential in our town centres. Alongside that element of the strategy, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport. 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] . No change is considered necessary.	Martin Arthur
	Retail		
Strat 12.11	Need to move away from building out of town retail parks.	Comment noted. Policy JP-P 4 states that In accordance with national planning policy, it is appropriate for retail and leisure facilities to be directed towards designated centres wherever possible. No change is considered necessary.	Maureen Buttle
Strat 12.12	Need to help shops survive rather than turning them into residential use.	Policy JP-Strat 12 supports increasing the resident population of main town centres alongside, rather than displacing, the range of non-residential uses in the centres. Such an approach will improve the vitality and viability of town centres, consistent with the approach outlined in the NPPF (Para 86a) which supports diversification and a range of uses, including residential. No change is considered necessary.	Helen Lloyd Higham
Strat 12.13	More people shop online than instore now. More shops not required and need to understand implications of brexit and covid	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] . No change is considered necessary.	Steven Renshaw
	Other		
Strat 12.14	Policy supports town centres for a range of non-residential uses but should also mention public houses	Policy JP-P 4 supports the role of the main town centres as local economic drivers that will continue to be developed, providing the primary focus for office,	Bolton CAMRA Trafford & Hulme CAMRA

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		retail, leisure and cultural activity for their surrounding areas. Public houses are included within leisure uses in this policy. The plan needs to be read as a whole therefore no change is necessary. No change is considered necessary.	GM CAMRA
Strat 12.15	Concerned that we are losing the small green spaces in town centres to development	Policy JP-Strat 12 requires development in town centres to be supported by new and improved public spaces and infrastructure. Additionally policies in Greener Places provide an appropriate policy framework in relation to this matter. No change is considered necessary.	Paul Roebuck
Strat 12.16	The policy needs to set out clear requirements for developers as regards the commercial and retail offer and on where transformation should take place in Town Centres, as well as identifying funding. The policy should also give numerical commitment to the extent and nature of residential provision. Promote growth and development	Policy JP-Strat 12 sets the high level strategic policy for the main town centres. It would not be appropriate for such detail to be included in the policy, relevant employment and housing targets are in chapters 6 and 7 and district Local Plans will provide more detailed policy guidance as appropriate. No change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Paul Kallee-Grover Stephen Cluer Peel Investments
Strat 12.17	Main Town Centres should be recommended to produce a Neighbourhood Business Plan	Policy JP-Strat 12 is a high level policy and it would not be appropriate for specific details relating to Neighbourhood Planning to be included. Such matters would be considered at the local, district level in collaboration with relevant partners and in line with national guidance. No change is considered necessary.	Friends of Carrington Moss
Strat 12.18	Include policy in the monitoring framework	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friend of Carrington Moss
Strat 12.19	Consider a strategic approach to Town Centre redevelopment is needed as regards Masterplans and large scale land assembly by LAs to achieve high quality sustainable housing	Policy JP-Strat 12 is a high level policy and it would not be appropriate for this level of detail to be included. Such matters will be considered at the local, district level. No change is considered necessary.	Greater Manchester Housing Providers
Strat 12.20	The high-level protection for heritage assets within the policy is noted. However, for the policy to be implemented as intended a brief explanation should be provided within the supporting justification. This would help ensure that the policy provides a positive strategy. Consider that as drafted the policy and the Chapter as a whole would be very incompatible with IA Objective 16	Policy JP-P2 provides the overall strategic policy approach to the historic environment, this policy would apply to development within town centres. The Plan should be read as a whole, therefore no change is considered necessary. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 12.21	The Revised Draft Salford Local Plan proposes to designate The Quays as a 'Main Town Centre'. It should therefore be identified alongside the other Main Town Centres in JP-Strat 12.	Policy JP-Strat 12 already covers this issue and states that should Salford Quays be designated as a town centre in the Salford Local Plan: Development Management Policies and Designations then development in that location will be subject to this policy. No change is considered necessary.	Peel L&P Ltd

PfE 2021 Policy JP-Strat 13 Strategic Green Infrastructure

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of development		
Strat 13.1	Strongly agree with the policy to protect and enhance Green and Blue Infrastructure assets	Noted	Friends of the Earth Kaitlyn Stockport Jacqueline Charnock Evelyn Frearson
Strat 13.2	Green Infrastructure is very important to health and wellbeing and the identity and sustainability of a place, and so should be integrated into new and existing communities, aided by planning policy. The PfE underestimates the importance of Green Infrastructure, and there is a need for joined-up thinking between this policy and other conflicting policies	PfE Policy JP-Strat 13 is a high-level strategic policy. Policy JP-S1 'Sustainable Development' requires development which maximises its economic, social and environmental benefits, whilst minimising its adverse impacts and actively seeking opportunities to secure net gains. See also policies within Chapter 8 'Greener Places'. The plan should be read as a whole. No change is considered necessary.	Janet Millett Maureen Buttle Laura Ettrick
Strat 13.3	The term Green Infrastructure is vague and does not provide specific details of what it will include	PfE Policy JP-Strat 13 is a high-level strategic policy. Policies within the Greener Places chapter particularly JP-G 2 set out more details of what it includes. The following supporting documents on Green Infrastructure Policy Context [07.01.01] and Guidance for Greater Manchester - Embedding Green Infrastructure Principles [07.01.02] provide more guidance. No change is considered necessary.	Carole Easey Stephen Lupton
Strat 13.4	Create new green spaces if brownfield sites are not suitable for development	Policy JP-G 6 supports working with developers and other stakeholders to deliver new high quality urban green spaces. This can include appropriate brownfield land. No change is considered necessary.	Save Greater Manchester Green Belt Stephen Cluer
	It is impossible to protect green spaces, lowland wetlands and mosslands if the intention is to build on it. The assets listed as protected must be protected within urban greenspaces, the allocations and countryside locations	PfE Policy JP-Strat 13 is a high-level strategic policy. Policies within Chapter 8 'Greener Places' provide the overall strategic policy approach to protecting green infrastructure. Additionally, specific references are made in the relevant allocation policies, as appropriate, to mitigate impact on green infrastructure. The Plan should be read as a whole and no changes are considered necessary	Edward Beckmann Andrew Scanlon Warburton Parish Council Friends of Carrington Moss Colin Walters Save Greater Manchesters Green Belt Olivia Hamnett Stephen Cluer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 13.5	The fourth strategic green infrastructure asset “Trees and woodland” should be renamed to clearly include hedgerows	Policy JP-G 4, which is linked to JP-Strat 13, seeks to increase features that act as stepping stones for wildlife such as hedgerows and trees. Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed. The Green and Blue Infrastructure Study that is summarised in paragraphs 3.2 to 3.22 of the Natural Environment Topic Paper (07.01.26) explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected due to their strategic scale and ability to deliver strategic-scale improvements to the delivery of ecosystem services for large areas of Greater Manchester. It is considered that this is a proportionate and justified evidence base to support the policy. Hedgerows do not form an opportunity area, but are likely to be present in the opportunity areas that have been identified. Protection of hedgerows are subject to separate regulations under the Hedgerows Regulations 1997 and is not a matter for the Places for Everyone Plan. No change is considered necessary.	Friends of the Earth CPRE
Strat 13.6	The list of green infrastructure assets must include more natural environments that are legally protected and locally important environments. As well as how well green infrastructure is functioning.	PfE Policy JP-Strat 13 is a high-level strategic policy. Policies within the Greener Places chapter particularly JP-G 2 sets out more detailed policy requirements. The following supporting documents on Green Infrastructure Policy Context (07.01.01) and Guidance for Greater Manchester - Embedding Green Infrastructure Principles (07.01.02) provide more guidance as regards functions and Green Infrastructure provision. The Plan should be read as a whole and it will provide the framework for more detail within Local Plans. Therefore no change is considered necessary.	Simon Robertson Faith Crompton Friends of the Earth
Strat 13.7	Should include reference to both the Trans Pennine Trail and National Cycle Network	JP-Strat 13 is a high-level strategic policy. Policy JP-C 5 supports creating safe, attractive and integrated walking and cycling infrastructure. This includes the Trans Pennine Trail and National Cycle Network. The Plan should be read as a whole. No change is considered necessary.	Trans Pennine Trail
Strat 13.8	Grasslands should be included within the listed strategic green infrastructure assets linked to a specific grasslands policy within Greener Places	JP-Strat 13 is a high-level strategic policy. The protection and enhancement of grassland is included within Policies JP-G 3, JP-G 4 and JP-G5. Therefore no change is considered necessary.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 13.9	Policy should also be strengthened to refer to “habitats” as well as “sites” of ecological value in the second sentence of the policy	PfE Policy JP-Strat 13 is a high-level strategic policy. Policies within Chapter 9 ‘Greener Places’ particularly JP-G 2 set out more details .The policy is considered consistent with the NPPF. No change is considered necessary.	The Wildlife Trusts
Strat 13.10	Public access to green and blue spaces should be guaranteed to those spaces created and enhanced	Policies within Chapter 9 ‘Greener Places’ support green infrastructure assets being accessible to the public – see specifically JP-G 3 ‘River Valleys and Waterways’. No change is considered necessary.	Ceridwen Haslam
Strat 13.11	Support the mention of Green Infrastructure assets being promoted and referencing other policies. However these assets should be proposed in the policy and they should be shown on District Local Plan maps	PfE is a strategic plan and Policy JP-Strat 13 sets out the Strategy for Green Infrastructure assets. Policies within the Greener Places chapter then set out more detail. The Plan should be read as a whole And it not necessary or appropriate to determine the scope of Local Plans in the PfE. That will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. Therefore no change is considered necessary. No change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management
Strat 13.12	Any maintenance requirement needs protection from a developer going bankrupt	This matter is considered to be outside the scope of this plan. No change is considered necessary.	Peter Thompson
	Other		
Strat 13.13	Welcome reference to the Peak District National Park as the constituent National Park for Greater Manchester and to provide context in relation to cross-boundary influence and the flow of the landscape from the National Park into the edge of Greater Manchester.	Noted	Peak District NPA

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

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of development		
Strat 14.1	Agree with all general statements but the current network is not well integrated. There is a need to improve connectivity and reduce travel costs for low-paid workers, including ensuring that public transport connects workers to employment sites outside 'office hours' to enable shift work; and that local journeys around the conurbation are facilitated, not just radial routes.	<p>JP-Strat 14 is a high-level strategic policy and further detail regarding how public transport, walking and cycling will be improved and how better integration will be achieved is set out in the Connected Places chapter.</p> <p>JP-Strat 14 should also be read alongside the GM transport strategy documents - GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. 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. No change is considered necessary.</p>	<p>Peter Christie</p> <p>Louise Seddon</p> <p>Kim Scragg</p> <p>Julie Halliwell</p> <p>Martin Arthur</p> <p>Peter Thompson</p> <p>Prospect GB and Dobinetts</p> <p>Regen</p> <p>Friends of Carrington Moss</p> <p>D Court</p> <p>Boys and Girls club of GM</p> <p>Sarah Cox</p> <p>Karen Cornwall</p> <p>Moorland Capital Partners</p> <p>No.1 Ltd</p>
Strat 14.2	There should be recognition of the importance of improved connectivity to other locations outside Greater Manchester, including towns such as St Helens and Chorley	Policy JP-Strat 14 recognises that improved connections are also required to locations outside of Greater Manchester, and that this will require regional and national improvement schemes. No change is considered necessary.	<p>Lucy O'Doherty</p> <p>Alistair Bradley</p>
Strat 14.3	Would like a higher modal shift target. Funding should be prioritised to sustainable transport away from new roads. New developments should be designed with public transport networks from the outset, and routes need to link homes to local centres and places of employment. Public transport needs to be affordable, reliable, accessible, comprehensive and safe	<p>The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p> <p>The target in Policy JP-Strat 14 that half of all daily trips can be made by public transport, cycling and walking is in line with the strategies and projects outlined above. The policy also supports that new development will have a significant role in delivering our future sustainable and integrated transport network. Policy JP-C 1 supports delivery of development that encourages sustainable transport usage and it also supports transport infrastructure that meets customers' needs</p>	<p>Friends of the Earth</p> <p>CPRE</p> <p>The Wildlife Trusts</p> <p>Helen Lloyd-Higham</p> <p>Steven Renshaw</p> <p>Sophie Hadfield</p> <p>Samantha Dugmore</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		by being integrated, reliable, resilient, safe and secure, well-maintained, environmentally responsible, attractive and healthy. No change is considered necessary.	
Strat 14.4	Explicit reference should be made in this policy to the Greater Manchester Transport Strategy 2040- Draft Delivery Plan (2020-2025) to ensure infrastructure delivery is aligned	Policy Strat 14 is a high level policy. Specific reference to the Greater Manchester Transport Strategy 2040 is made in numerous places within the Connected Places chapter which provides more detail on specific transport policies. The Plan should be read as a whole and no change is necessary.	RLAM
Strat 14.5	Enhancement of existing public transport and highway networks is supported but Government funding is needed to support this	Noted. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Peel L&P Investments
Strat 14.6	The words 'accessible' and 'accessibility' should be clearly defined, or alternative words used, so it is clear for disabled people and others on what is intended and what to expect from the policies in the Plan	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Strat 14.7	The policy reads like a vision it should cross reference other relevant transport policies in PfE plan and state what investment is planned and where. This should then carry through to showing these on District Local Plan maps	Policy Strat 14 is a high level policy. More detailed policies can be found in the Connected Places and Allocations chapters. The Allocation policies include details on transport infrastructure to support those specific allocations. The Plan should be read as a whole. It is not necessary or appropriate to determine the scope of local plans in PfE that will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. No change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Boys and Girls Club of GM

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 14.8	Public transport outside of the Regional Centre is inadequate and does not provide a credible alternative to the private car. Bus services particularly in rural areas are being reduced. There is also a need to improve public transport provision to the Wigan /Bolton area.	Policy Strat 14 is a high level policy. More detailed policies can be found in the Connected Places and Allocations chapters. Allocation policies include details on transport infrastructure to support those specific allocations. The Plan should be read as a whole. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Sophie Hadfield Irene Thompson Terence Kelly Michael Hullock Jeremy Williams Edward Beckmann David McLaughlin Warburton Parish Council Carole Dawson David Hawes
Strat 14.9	Consider that investment in public transport is unlikely to be adequate to provide for the cumulative effects of development	The cumulative effects of development have been assessed in the transport evidence and specific schemes have been identified to support development in the existing land supply and the allocations. Full details of the transport evidence supporting PfE is available here: Transport Evidence . For the allocations particular reference should be made to the Transport Locality Assessments [09.01.07 – 09.01.28]. For the existing land supply see the Existing Land Supply and Transport Technical Note [09.01.05] . No change is considered necessary.	Friends of the Earth Simister Village Community Association
Strat 14.10	More details are needed on the nature, scale and timing of improvements particularly bus improvements	Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . The Delivery Plan sets out a high level programme of schemes within five year windows. In addition schemes which have been identified in the Transport Locality Assessments will be phased alongside development – see [09.01.07 – 09.01.28] and the allocation policies. Further information on the nature, scale and timing of improvements will also emerge as more detailed studies are undertaken for specific schemes. No change is considered necessary.	Martin Arthur National Highways Simon Robertson
	Metrolink		
Strat 14.11	Metrolink encourages people to get out of their car and relieves traffic on the road network, there is support for further expansion of the Metrolink network.	Noted	Martin Arthur Steven Renshaw

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Strat 14.12	Current Metrolink network is overcrowded and cannot accommodate more passengers or stops. There is also some criticism about the cost of travel on Metrolink.	The PfE is supported by a comprehensive package to improve transport facilities across Greater Manchester including addressing current network capacity issues. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . This will enable the future expansion of the rapid transit public transport network across Greater Manchester including the development of orbital links. Additionally initiatives such as integrated smart ticketing and reform of the bus market will have the potential to bring significant benefits to the network. No change is considered necessary.	Carole Easey Laura Charlotte Joanne Harland
Strat 14.13	Proposed extensions of tram networks and reopening of old railway lines will result in a loss of homes	The PfE is a high level strategic plan and, whilst it includes proposals for improvements to the transport network, the details of the scheme will be a matter for consideration at the detailed planning applications stage. Details on public transport infrastructure extensions are included within our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Trevor Widdop
Strat 14.14	Metrolink car parks should be removed they encourage more local congestion.	It is considered that Metrolink car parks encourage people to take shorter car journeys and use the Metrolink network to access Manchester city centre and other key employment locations, therefore reducing congestion and improving air quality in these areas. No change is considered necessary.	Philip Crombleholme
	Pollution and congestion		
Strat 14.15	Roads and motorways are congested and new developments will make them worse. There is a need for new roads. In addition, plans for public transport are not comprehensive enough to achieve modal shift and reduce congestion e.g. more park and ride car parks are needed near motorway junctions.	The cumulative effects of development have been assessed in the transport evidence and specific schemes have been identified to support development in the existing land supply and the allocations. Full details of the transport evidence supporting PfE is available here: Transport Evidence . For the allocations particular reference should be made to the Transport Locality Assessments [09.01.07 – 09.01.28]. For the existing land supply see the Existing Land Supply and Transport Technical Note [09.01.05] . In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the	John A Holden Stephen Woolley Susan Theodossiadis Susan Peat Paul Roebuck Colin Walters Julie Riley Maureen Buttler Laura Charlotte Barbara Lloyd Stephen Woolley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Philip Crombleholme
	Highways		
Strat 14.16	Reduce speeds on all roads	Highways speed limits is not in the scope of the PfE. No change is considered necessary.	Susan Theodossiadis
	Other		
Strat 14.17	HS2 should be abandoned. It's not needed and investment should be used on other services in the area	Decisions relating to the HS2 Phase 2B scheme are outside of the scope of PfE. Whilst HS2 would bring significant benefits to Greater Manchester, the proposals in PfE are not dependent on the delivery of HS2. No change is considered necessary.	Friends of the Earth CPRE Peter Thompson The Wildlife Trusts Lorraine Rogers Paul Roebuck Anne Isherwood E Bowles Alan Gibson Laura Ettrick Rosaleen O'Donnell
Strat 14.18	Aspirations of the policy could be realised by the delivery of a mobility hub or multi-modal public transport facility at a new employment site at Bradly Lane, Trafford.	Policy JP-Strat 14 provides an overarching strategic policy rather than focusing on specific sites. Specific locations will be considered as part of district Local Plans. Mobility hubs / multi-modal transport facilities are supported in the GM Transport Strategy. See the GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . No change is considered necessary.	Joe Heys

Appendix:

PfE 2021 Our Strategy

Table 1. Our Strategy additional respondents

Row	Respondent name
Our Strat 2	Milnes Gaskell Estate Highgrove Strategic Land Harworth Group NPL Group EON Plant PD Northern Steels Landowners of Holme Valley PD Northern Trust Asset Management Oltec Group BDW Trading Ltd Jones Homes Northern Gateway Development Vehicle LLP Aviva Life & Pensions UK Joanne Maffia

Respondents to PfE 2021 Policy JP-Strat 6

Table 2. Policy JP-Strat 6 additional respondents

Row	Respondent name
Strat 6.1	Gladman Developments Redrow Homes (Lancashire) Friends of the Earth Peel L&P Investments CPRE Milnes Gaskell Estate Highgrove Strategic Land Bellway Homes Ltd GLP Trows and BDW Trading D Court Redrow Homes Russell LDP Historic England Seddon Homes BDW Trading Jones Homes (North West) HIMOR, Redrow Homes and VHW Partnership Miller Homes Metacre Ltd Persimmon Homes North West Northern Gateway Development Vehicle Taylor Wimpey