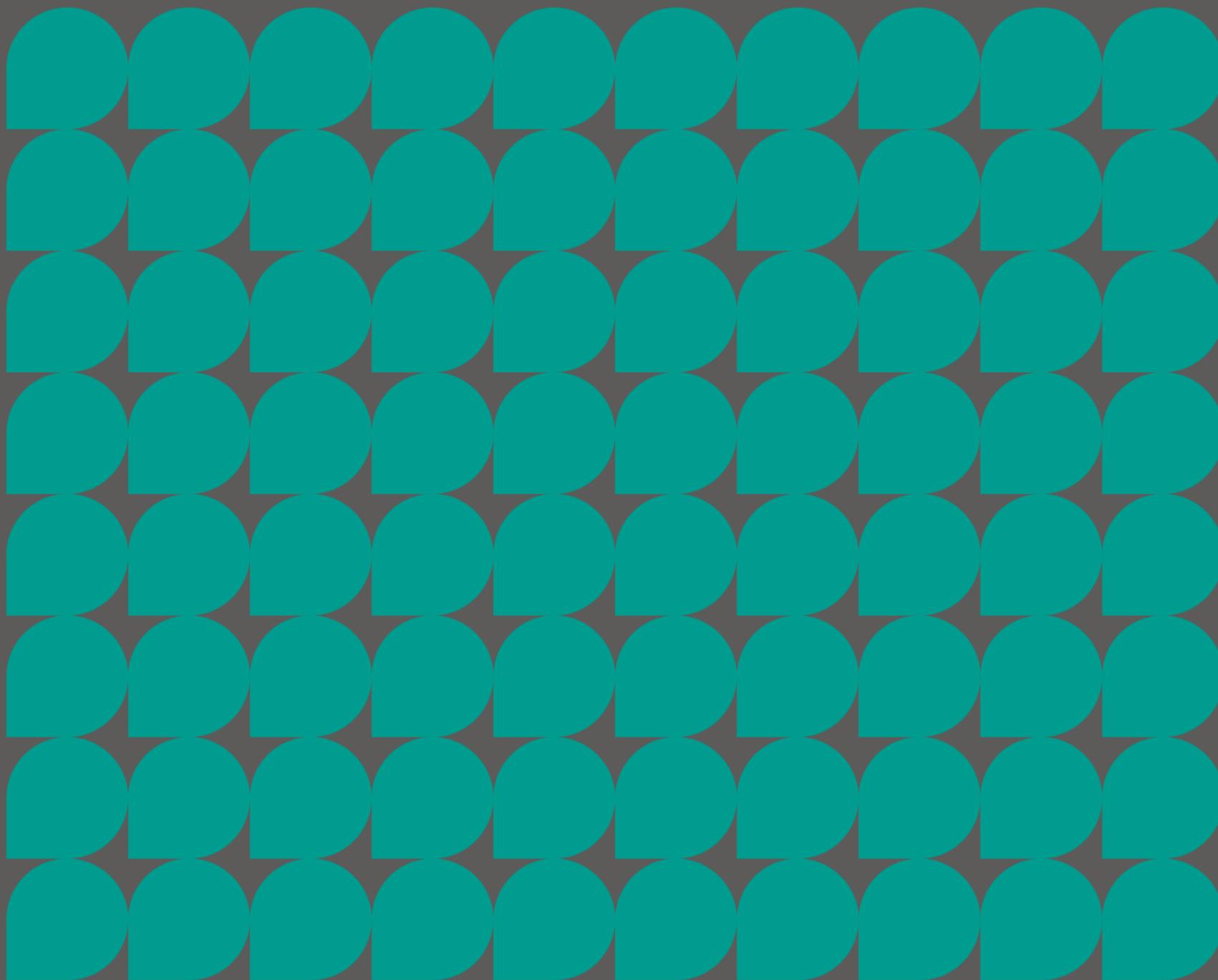


Places for Everyone

Places for Homes Issues Summary

February 2022



Chapter 7 – Places for Homes

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

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

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Housing Targets			
JPH1_JPH1.1	We support the plan meeting the full LHN as a minimum over the plan period.	Support noted.	See Appendix
JPH1_JPH1.2	The LHN calculated using the standard method should be treated as a minimum in line with PPG.	PfE Policy JP-H1 (see page 132) states that “A minimum of 164,880 net additional dwellings will be delivered over the period 2021-37 ...”. This is consistent with the identified LHN of 164,880. No change necessary.	See Appendix
JPH1_JPH1.3	Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances. This has not been thoroughly explored. It is not a legal requirement to use the standard method based on the 2014 projections.	As stated in para. 1.36 of the plan, it is not considered that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	See Appendix
JPH1_JPH1.4	The need to consider whether exceptional circumstances apply only arises where an alternative approach results in a lower target. There are a number of circumstances applicable to the PfE plan area that would indicate a higher target should be considered.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	Redcliff Estates Richborough Estates
JPH1_JPH1.5	The minimum annual housing need figure has been interpreted as the housing requirement, rather than as the first step in a process of deciding how many more homes actually need to be planned for (the housing requirement).	Disagree. The approach taken is in accordance with NPPF and NPPG. It is not considered that exceptional circumstances exist to justify departure from the standard methodology. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local	Persimmon Homes North West Morris Homes (North) Ltd Story Homes Ltd

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		housing need calculated using the standard method together with meeting the objectively assessed needs for employment land represents the preferred growth option and the best fit with the overall ambitions of the nine districts. The housing requirement figure set in policy JP-H1 is meeting the identified housing need in full. No change necessary.	Gladman Developments Bellway Homes Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.6	There is no legal requirement to meet the local housing need. The Government has stated that LHN is a starting point not a target, land supply and environmental considerations can be taken into account, Green Belt remains a priority and that not everywhere will be able to meet their full LHN.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options, including an option which limits the level of growth to what would be capable of being delivered within the existing land supply, and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. Environmental and Green Belt issues have been considered as summarised in the Green Belt Topic Paper [07.01.25] and the Integrated Appraisal of the plan. No change is considered necessary.	Howard Sykes Friends of Carrington Moss David Bentley
JPH1_JPH1.7	There is insufficient consideration of whether PfE should be planning for a higher level of growth, and the plan is therefore not sound as it has not been positively prepared. No alternatives have been considered in the SHMA.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	See Appendix
JPH1_JPH1.8	Defining the LHN appears to have been conflated with consideration of housing land supply and how housing can be accommodated, with an overarching constraint being applied in terms of minimising GB release.	As stated in paragraph 7.4 of the plan, the standard method has been used to assess local housing need as expected by NPPF. No change necessary.	Redcliff Estates
JPH1_JPH1.9	The housing need figure should be further uplifted to support economic growth and increase affordable housing delivery.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14), the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for and	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>incorporates an affordability uplift, plus a further 35% cities and urban centres uplift for Manchester City Council. We do not consider that exceptional circumstances exist to justify departure from the standard methodology.</p> <p>As demonstrated in the Growth and Spatial Options Paper [02.01.10] meeting the LHN will support the economic growth options ambitions of the plan.</p> <p>No change necessary.</p>	
JPH1_JPH1.10	The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. The method does not attempt to predict the impact of changing economic circumstances on housing need.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts, including those relating to economic growth. No change necessary.	See Appendix
JPH1_JPH1.11	Insufficient account has been taken of factors that would have led to a higher housing need figure being calculated.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	See Appendix
JPH1_JPH1.12	The level of housing proposed will not be sufficient to accommodate the workforce created through the jobs growth forecast.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	<p>Redrow Homes</p> <p>Peel L&P Investments (North) Ltd</p> <p>Hollins Strategic Land</p> <p>PD Northern Steels</p> <p>HIMOR Group</p> <p>Hollins Strategic Land</p> <p>Hollins Strategic Land LLP</p> <p>Hollins Strategic Land</p> <p>Wainhomes (NW) Ltd</p>

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JPH1_JPH1.13	The housing targets currently proposed fall short of meeting the current development needs and allow no buffer for accounting for changing economic contexts in future.	In line with NPPG and NPPG the housing targets meet the LHN calculated using the standard method. This does not include a requirement to include a buffer to account for changing circumstances, which would be correctly dealt with through monitoring and plan review if necessary. No change necessary.	See Appendix
JPH1_JPH1.14	<p>A higher housing requirement would be justified by the need to meet the needs for affordable housing.</p> <p>The affordability uplift in the standard method does not take into account worsening trends over time which have resulted from past under delivery, hence a more significant uplift should be applied and a higher housing requirement pursued which is not backloaded.</p> <p>Affordability issues have resulted in decreases in household formation rates and increases in overcrowding and homelessness.</p>	<p>The standard method with has been used to calculate LHN and forms the basis for the housing targets in the plan incorporates an affordability uplift.</p> <p>As shown in the Housing Topic Paper [06.01.03] (para. 3.8 – 3.15) the standard method results in an affordability uplift of 1,164 units per year (14% above LHN step 1 based on 2014-projections alone), and a further 914 units per year uplift is applied to Manchester through the 35% cities and urban centres uplift. The annual LHN is therefore 25% higher (2,078 units per year) than the LHN step 1 average annual household growth.</p> <p>An option to increase the target was assessed in the Growth and Spatial Options paper [02.01.10], but concluded on balance that meeting the LHN was the best fit with the overall ambitions of the nine districts.</p> <p>Policy H2 seeks to address the affordability of new housing and reflects the evidence in the Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207 to 228).</p> <p>Therefore no change is considered necessary.</p>	See Appendix
JPH1_JPH1.15	<p>The standard method uses the 2014 projections and will therefore be based on trends pre-2014, at a time when the conurbation's population was not growing as quickly as it is now. This means there is a major risk that by not factoring faster growth seen post 2014 the LHN is underestimated. The employment growth rate has also increased post 2014.</p>	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	Highgrove Strategic Land Ltd Rowland Homes Ltd

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		The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts, including economic ambitions. No change necessary.	
JPH1_JPH1.16	Targets should be increased to between 11,300 and 13,500 homes per annum to accommodate job growth / targets should be increased to 200,000 total to keep pace with employment growth.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts, including economic ambitions. We therefore consider that the targets are appropriate and will enable economic growth, no change is considered necessary.	Peel L&P Investments (North) Ltd Home Builders Federation
JPH1_JPH1.17	PfE has become less ambitious over each iteration of GMSF, and it is hard to see how it will boost northern competitiveness.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. The 'rules' applied to the site selection process are summarised in para. 5.7, and include ensuring that collectively the northern Greater Manchester districts should meet around 100% of their collective LHN, in order to ensure that the overall objective of inclusive growth and boosting the competitiveness of north Greater Manchester would succeed. The northern districts will see an increase over and above current levels of housing growth. Therefore no change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes Ltd Seddon Homes Ltd PD Northern Trust Asset Management Richborough Estates PD Northern Trust Asset Management Boys & Girls Club of GM
JPH1_JPH1.18	The standard method for calculating local housing need should not be used as the basis for the housing targets. It is based on out of date data and therefore contrary to NPPF. The scale of housing is unnecessary if the latest population figures are used. More up to date population data show substantially reduced needs.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based	See Appendix

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		<p>household projections have been used as the starting point for the assessment of Local Housing Need.</p> <p>The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. Therefore no change is considered necessary.</p>	
JPH1_JPH1.19	<p>The most up to date information should be used, so Bury's most recent Housing Needs Assessment 2020 must be taken into consideration.</p>	<p>It is considered that a proportionate evidence base has been provided to support the policy. The Greater Manchester Strategic Housing Market Assessment [06.01.02] (April 2021) provides up-to-date evidence of housing needs to support the Places for Everyone plan.</p> <p>District Housing Needs Assessment would be used, as appropriate, in the preparation of Local Plans. Therefore no change is considered necessary.</p>	<p>Gary West David McLaugh C Smith Jane Lester The Friends of Bury Folk Stephen Cluer Christopher Russell Philip Smith-Lawrence Juliet Eastham David Brownlow Daniel Lawson</p>
JPH1_JPH1.20	<p>Comparing the housing targets with the projected population increase gives a far lower occupancy rate than there is currently. Using the current occupancy rate would result in a lower housing requirement.</p> <p>Compared to the projected population change, PfE is planning for around 1 home per additional person. Given that the average household size is around 2.4 persons per household, this is illogical and unsound. An argument for exceptional circumstances to deviate from the government guidance should have been made instead of using these figures to justify Green Belt release.</p>	<p>No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need, which is based on the 2014-based household projections.</p> <p>Under the current methodology the overall annual housing need for the plan area is 10,305 homes, or 164,880 over the plan period.</p> <p>It is important to note that the characteristics of households will not remain static over the plan period as shown in the Greater Manchester Strategic Housing Market Assessment [06.01.02] section 4.6, with a particular increase in one person households and other multi-adult</p>	<p>Christopher Russell Mark H Burton David Bentley Susan Sollazzi Steven Bowater Friends of Carrington Moss SGMGB - Rochdale Groups Thornham St John's Neighbourhood Forum Climate Action Bury</p>

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		households. A significant part of the increase in households is a result of the ageing population leading to more 1 or 2 person households, resulting in a need for more homes to accommodate the same number people. The reduction in the average household size means that more homes would be required even if there was no increase in population. It is therefore not considered that this amounts to exceptional circumstances to deviate from the standard method.	Jamie Bentham Ian Hubbard
JPH1_JPH1.21	Housing targets are based on 2014 data. Brexit and the Covid pandemic could have changed the housing need and the need for additional housing land. Housing estimates should therefore be updated based on up-to-date figures.	No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	See Appendix
JPH1_JPH1.22	A lack of brownfield land in the area and the economic shock caused by Brexit and Covid 19 have not been taken into account in considering whether to deviate from the standard method. Housing need does not trump Green Belt, and targets can be lowered if there is a lack of brownfield sites in the area (such as in Bury), density has been maximised and there has been cooperation with neighbouring authorities to share need.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options, including options which rely solely on the existing land supply with no Green Belt release, and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . As made clear in the Green Belt Topic Paper [07.01.25] all alternatives to Green Belt have been fully examined. 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	See Appendix

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		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] .	
JPH1_JPH1.23	NPPF requires policies to be updated every 5 years if there is significant change. There is therefore a legal opportunity to establish a modest plan and see how it goes, instead of allocating the largest number of houses possible right now, which is environmentally damaging and irresponsible.	NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need, and for strategic policies to provide a clear strategy for bringing sufficient land forward to address objectively assessed needs over the plan period which should be a minimum 15 year period from adoption. PfE seeks to identify sufficient housing land to meet housing needs over the plan period, in accordance with NPPF. Therefore no change is considered necessary. As set out in the monitoring framework in Chapter 12 monitoring is a key component of the plan. If the results of monitoring show a significant change in circumstances, this would be dealt with through plan review if necessary.	David Bentley
JPH1_JPH1.24	The plan appears to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The plan is therefore deemed to be unsound, as whilst one can argue it has been positively prepared (in terms of its aspiration) it cannot be seen to be being realistic.	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Table 6.3 the overall annual housing need for the plan area is 10,305 homes, or 164,880 over the plan period. The nine PfE authorities have decided to share this total housing need figure between the districts using the overall spatial strategy. Through this process individual housing targets for each of the nine districts have been identified and are set out in Places for Everyone Table 7.2. 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. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options, including not releasing Green Belt or meeting full housing need, and concludes that the local housing need calculated using the standard method represents the preferred	Save Greater Manchester's Green Belt (SGMGB) SGMGB - Oldham Groups SGMGB - Bury Groups SGMGB - Rochdale Groups SGMGB - Save Apethorn & Bowlacre Jane Lester The Friends of Bury Folk Stephen Cluer

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		<p>growth option and the best fit with the overall ambitions of the nine districts.</p> <p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.03.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>	<p>Thornham St John's Neighbourhood Forum Zoe Sherlock</p>
JPH1_JPH1.25	GM can comfortably meet the baseline need for 131,630 from existing population projections, plus the affordability and cities and urban centres uplift, from the existing land supply, and retain a buffer of 13,462. The buffer would be even higher if 2016 or 2018 projections were used.	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) the overall annual housing need for the plan area is 10,305 homes, or 164,880 over the plan period, based on the standard method set out in the PPG. As stated in para. 1.36 of the plan, it is not considered that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	<p>Lisa Powell Robyn Powell Sam Powell</p>
JPH1_JPH1.26	The plan period should be reduced to 15 years to allow for future changes in population growth and demographics to be catered for, and in particular the effect of Brexit.	Para. 22 of the NPPF is clear that strategic policies should look ahead over a minimum 15 year period from adoption. A plan period of 16 years is considered to be reasonable and no change is therefore necessary.	Christopher Russell
JPH1_JPH1.27	The change from a plan period of 2020-2037 to 2021-2037 should be made more clear as at first glance it appears that targets have decreased when they have actually increased.	<p>No changes necessary. The plan period 2021-2037 is referred to throughout the Places for Everyone plan.</p> <p>Manchester is the only district which has seen a large increase in its target when compared to the 2020 GMSF. This is as a result of a change in Government policy (the introduction of the 35% uplift to LHN).</p>	Royal London Asset Management
JPH1_JPH1.28	The plan period should be extended to ensure that it covers a full 15-year period from adoption.	No changes necessary. Whilst the PfE Plan period evidence base covers 2020 to 2037, it is acknowledged that if the PfE Plan were to be	The Strategic Land Group

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		<p>adopted in 2023, it would provide 14 years' policy post adoption. However, it is considered very likely that when the land supply is updated from its 2020 base date, that sufficient land supply will exist to cover a minimum of 15 years from adoption.</p>	<p>D Jones Story Homes Ltd Bellway Homes Ltd Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.29	<p>The plan period should be extended to at least 2051 to align with NPPF para. 22.</p>	<p>The Regulation 19 version of the PfE had already been published for approval by the individual districts at the time the NPPF was revised in July 2021. At that point in time no definition had been provided in NPPF or NPPG for the phrase "<i>larger scale developments such as new settlements or significant extensions to existing villages and towns</i>". Therefore it was considered appropriate to proceed with the Regulation 19 consultation with a view to reviewing the position following the consultation, should guidance be published. NPPG was indeed revised in October 2021 and clarifies that the new policy requirement in paragraph 22 applies "where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period." [NPPG Paragraph: 083 Reference ID: 61-083-20211004]. It is therefore considered that the PfE Plan has been prepared in accordance with the new element of NPPF paragraph 22 and no change is required to the Plan.</p>	<p>The Strategic Land Group D Jones Story Homes Ltd Bellway Homes Ltd Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.30	<p>The plan is not positively prepared as it contains an over reliance on unallocated land. It is inconsistent with NPPF paras. 15, 20, 31 and 74.</p>	<p>The land supply has been identified in a way consistent with NPPF and NPPG as set out in the Housing Topic Paper [06.01.03]. The scope of the PfE plan is to identify sufficient land supply to supplement the existing land supply through allocating land outside the urban area. Any</p>	<p>The Strategic Land Group D Jones Story Homes</p>

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		decision to allocate sites from within the existing land supply within local plans will be matter for the individual local planning authorities to consider. No change necessary.	Bellway Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.31	Additional allocations are being added because the local authorities can't plan properly, within their evidenced supply.	No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.	Lisa Powell Robin Powell Sam Powell
JPH1_JPH1.32	The land allocations for housing will not be sufficient to accommodate the growth of new households. The lack of allocations in PfE (particularly given reductions in Oldham) will be a restraint on growth and the proper development of GM.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) the overall annual housing need for the plan area is 10,305 homes, or 164,880 over the plan period, based on the standard method set out in the PPG. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.	See Appendix
JPH1_JPH1.33	The relationship between the housing requirement of Stockport and PfE remains unresolved. There is no evidence that effective and on-going joint working with Stockport has occurred. It remains unlikely that Stockport will meet its own development needs, resulting in increased pressure for more housing within the PfE plan area from people who would otherwise have lived in Stockport.	No changes necessary. PfE clearly sets out to meet the housing needs of its nine constituent authorities. This approach is justified in the Growth and Spatial Options Paper [02.01.10] . The Duty to Co-operate documentation demonstrates that there have been attempts at effective and on-going joint working with Stockport. However due to circumstances within Stockport, it has not been possible to reach agreement on all matters. This does not mean that the PfE should be	Persimmon Homes North West Morris Homes (North) Ltd Woodford Neighbourhood Forum

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		delayed until such time that the Stockport Local Plan is further advanced.	
JPH1_JPH1.34	Housing requirement previously offloaded from Stockport to Manchester City Council is no longer possible due to the city's 35% uplift. Manchester cannot deliver sufficient levels of family housing and as such needs to redistribute part of its requirement to areas within its HMA (Salford, Trafford and Stockport).	No changes necessary. National Planning Practice Guidance Paragraph: 035 Reference ID: 2a-035-20201216 clearly states that the increase in the number of homes resulting from the 35% uplift is expected to be met by the cities and urban centres themselves, rather than the surrounding areas.	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.35	If the City of Manchester were dropped from PfE, the allocations on the Green Belt could be reduced by thousands of homes by bringing the buffer down to the standard 10–15 percent range.	As stated in the Housing Topic Paper [06.01.03] para. 6.28, the City of Manchester is meeting 100% of its LHN (including the 35% cities and urban centres uplift). No Green Belt release is required to meet any unmet housing need from the City of Manchester. The Housing Topic Paper [06.01.03] Table 6.1 shows that a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. This is broadly in line with the range suggested by the respondent. No change is considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Jane Lester The Friends of Bury Folk Stephen Cluer
JPH1_JPH1.36	PfE does not have substantially the same effect as GMSF. A change in methodology for Manchester City Council resulted in a 35% uplift, which the methodology requires to be met within the district and not redistributed. This represents a significant change between GMSF and PfE. Previous consultation was on the basis that Manchester was absorbing housing need therefore reducing Green Belt loss. This is no longer the case.	The move from GMSF to PfE is dealt with elsewhere. As stated in the Housing Topic Paper [06.01.03] para. 6.28, the City of Manchester is meeting 100% of its LHN (including the 35% cities and urban centres uplift). No Green Belt release is required to meet any unmet housing need from the City of Manchester. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. No changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Jane Lester The Friends of Bury Folk Stephen Cluer Susan Dennett Matthew Oxley Gary West Alan Bayfield C Smith Christopher Russell Elisabeth Berry Daniel Lawson

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			Save Royton's Greenbelt Community Group
JPH1_JPH1.37	The policy should be amended to secure an uplift on housing provision within the City of Manchester to promote the provision of previously developed land and prevent encroachment onto the Green Belt.	No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.	Save Greater Manchester's Green Belt (SGMGB) Jane Lester The Friends of Bury Folk Stephen Cluer
JPH1_JPH1.38	The plan has chosen to address housing provision on a city-region basis rather than a district basis, therefore housing need in one part of GM can lead to Green Belt allocations in another. This effectively positions Manchester's 35% uplift as an exceptional circumstance for changes to the Green Belt. Without presenting the 35 percent uplift as an evidenced exceptional circumstance and subjecting it to a Regulation 18 consultation, it is difficult to see how progressing to a Regulation 19 consultation is legal.	No changes necessary. The total local housing need of the 9 districts includes the 35% uplift for Manchester. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan. This includes consideration of the need to identify sufficient land to meet the local housing need for the joint plan area. The move from GMSF to PfE is dealt with elsewhere.	Save Royton's Greenbelt Community Group
JPH1_JPH1.39	The City of Manchester uplift should be used to absorb housing need from the boroughs as proposed in the Greater Manchester Spatial Framework, rather than accommodating an arbitrary target imposed by the Local Housing Need methodology.	No changes necessary. The 35% uplift is part of the City of Manchester's local housing need calculated using the standard method which the NPPF expects strategic policy-making authorities to follow. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. National Planning Practice Guidance Paragraph: 035 Reference ID: 2a-035-20201216 clearly states that the increase in the number of homes	Save Royton's Greenbelt Community Group

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		<p>resulting from the 35% uplift is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. As stated in the Housing Topic Paper [06.01.03] para. 6.28, the City of Manchester is meeting 100% of its LHN (including the 35% cities and urban centres uplift).</p> <p>By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.</p>	
JPH1_JPH1.40	The arguments about alleged housing need show that much of what was presented in the 2016 Draft GMSF was not only arbitrary, but also wrong and highly misleading (particular reference to changes to number of homes to be delivered at New Carrington within the plan period).	<p>No changes necessary. Since the 2016 Draft GMSF was published national planning policies and guidance have changed, notably with the introduction of the standard method for calculating Local Housing Need, and evidence has been updated. The Places for Everyone plan is based on the latest methodology (published in December 2020), which NPPF expects strategic policy-making authorities to follow.</p> <p>Since 2016 a masterplan for New Carrington has been produced that has helped to inform the overall development quantum for New Carrington. See JPA33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan [10.09.06].</p>	Jeremy Williams
JPH1_JPH1.41	Lack of clarity on the question of compatibility of and priority of existing / proposed neighbourhood plan housing need assessments with PfE targets.	No changes necessary. As PfE will be part of the development plan, the relationship with neighbourhood plans will be as set out in NPPF and NPPG. The approach to identifying housing targets for neighbourhood plan areas will be a matter for consideration at the local level.	Anthony Rigby
JPH1_JPH1.42	<p>Instead of inviting people to live in the region the policy should be divert an increasing population to locations that can better serve them.</p> <p>New housing should be to meet the needs of local people.</p>	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts.	<p>Jeff Houghton</p> <p>Kevin Lawton</p> <p>Mark Haynes</p>
JPH1_JPH1.43	Appears to be a typo in table 7.2 - annual average for Trafford should state 1,122 instead of 1,112dpa.	No changes necessary. Typo noted however it is not considered to be a soundness issue. The stepped targets for Trafford are correct and reflect the evidence base, see Table 6.2 of the Housing Topic Paper [06.01.03] .	<p>Story Homes Limited</p> <p>Redrow Homes</p> <p>Bellway Homes</p>

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			Housebuilding Consortium Taylor Wimpey
Spatial distribution			
JPH1_JPH1.44	There is no clear justification that GM acts as a single functional housing market area.	No change necessary, it is considered that the Greater Manchester Strategic Housing Market Assessment [06.01.02] defines the housing market area in accordance with national guidance. Therefore, its conclusion that Greater Manchester can be defined as a single housing market for planning purposes, is reasonable.	Story Homes Limited Bellway Homes Housebuilding Consortium Taylor Wimpey Gladman Developments NPL Group Metacre Ltd Peter Rowlinson
JPH1_JPH1.45	Treating Greater Manchester as a single housing market area will lead to an under-provision of homes within certain districts. Relying on certain districts to meet the housing needs of other districts' could result in the housing needs of workers employed in those 'other' districts not being provided for.	The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 2 defines the housing market area in accordance with national guidance and concludes that Greater Manchester can be defined as a housing market for planning purposes. The complex functioning of housing and labour markets within Greater Manchester means that there is no simple way of subdividing the conurbation into separate identifiable housing market areas. No change necessary.	Story Homes Limited Bellway Homes Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.46	As a minimum the housing supply proposed should meet full standard method-based housing need in each respective district, regardless of any planned over provision in areas where the GMCA is seeking to diversify local housing markets and stimulate economic growth.	No change necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas.	Story Homes Limited Bellway Homes Housebuilding Consortium Taylor Wimpey

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		The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] .	
JPH1_JPH1.47	<p>None of the three districts that have a big reduction in their housing target compared to their local housing need (Bury, Tameside and Trafford) have a strong relationship with any of the Central / northern districts that will take on board their shortfall. Wigan in particular appears to be a separate housing market.</p> <p>Bury has very weak housing market integration with any other district. Delivering its needs in other authorities such as Rochdale, Wigan and Salford will not actually meet the needs of Bury residents.</p>	<p>No change necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 2 defines the housing market area. It concludes that Greater Manchester can reasonably be defined as a housing market for planning purposes.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p>	<p>Story Homes Limited Bellway Homes Home Builders Federation Housebuilding Consortium Taylor Wimpey Hollins Strategic Land</p>
JPH1_JPH1.48	<p>Altering housing market geographies is a gradual process. The priority in the early years of the plan should be to ensure an adequacy of new housing supply in all sub-market areas, including current popular markets, to attract and retain the workforce GM needs to boost productivity and maintain southern competitiveness. There is a danger of households moving to surrounding areas, causing unsustainable commuting patterns.</p>	<p>No change necessary, it is considered that the Greater Manchester Strategic Housing Market Assessment [06.01.02] defines the housing market area in accordance with national guidance. Therefore, its conclusion that Greater Manchester can be defined as a single housing market for planning purposes, is reasonable.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial</p>	<p>Home Builders Federation</p>

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		Options Paper [02.01.10] . Sufficient housing supply has been identified to meet the housing targets in all areas. As stated in para.7.16 - 7.18 of the Places for Everyone plan, it is considered appropriate to identify a phasing trajectory which is realistic and which will result in housing being delivered as planned over the life of the plan. The approach to stepped targets is considered to be consistent with NPPF and NPPG.	
JPH1_JPH1.49	Developers will continue to exploit the areas with established markets and highest returns.	Comment noted. The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites.	Linus Mortlock
JPH1_JPH1.50	The targets are being reduced from LHN in the three least affordable districts, and increased in some of the most affordable districts. There is a mismatch between the areas with the highest affordable housing need and the highest proposed housing targets. Setting a target below the minimum and underproviding suitable land will exacerbate the affordability issues, particularly in some of the authorities with the highest affordability issues. The strategy should ensure that the full LHN is met within each local authority in order to avoid worsening housing availability and affordability in individual districts.	No change necessary, the Greater Manchester Strategic Housing Market Assessment [06.01.02] defines Greater Manchester as a single housing market for planning purposes. The Places for Everyone plan seeks to meet the LHN calculated using the standard method in full across the plan area as a whole. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts. Policy H2 provides an appropriate policy framework for delivering affordable housing across the plan area, supported through district specific policies in local plans.	Story Homes Limited Bellway Homes Housebuilding Consortium Taylor Wimpey Gladman Developments Metacre Ltd Highgrove Strategic Land Rowland Homes Housebuilding Consortium
JPH1_JPH1.51	The lower quartile affordability ratio in Trafford (highest of any district in northern England) emphasises the issue that GM cannot be considered a single housing market area.	No change necessary, it is considered that the Greater Manchester Strategic Housing Market Assessment [06.01.02] defines the housing market area in accordance with national guidance. Therefore, its conclusion that Greater Manchester can be defined as a single housing market for planning purposes, is reasonable.	Story Homes Limited Bellway Homes Housebuilding Consortium Taylor Wimpey

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JPH1_JPH1.52	Increasing targets in Manchester, Salford and Trafford to match the identified capacity in these areas would help to deliver affordable housing, as these are higher value areas.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts and was also found to perform the best in the Integrated Appraisal of the plan as stated in Section 14 of the Growth and Spatial Options Paper. Increasing Manchester and Trafford's targets any further would adversely affect their flexibility buffers which are necessary to demonstrate deliverability. To increase Salford's target above 125% of its LHN would deliver a spatial distribution contrary to our spatial strategy.	Home Builders Federation
JPH1_JPH1.53	The proposed redistribution does not align with the key objectives of the plan, will do little to assist in the regeneration of GM and will worsen affordability and economic growth.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts and was also found to perform the best in the Integrated Appraisal of the plan as stated in Section 14 of the Growth and Spatial Options Paper. The targets set out in the plan will deliver the strategy, therefore no change is necessary.	Story Homes Limited Peel L&P Investments (North) Ltd Milnes Gaskell Estate Bellway Homes NPL Group HIMOR, Redrow Homes Limited and VHW Partnership Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.54	The housing land supply fails to provide the necessary land options within each district to ensure balanced, inclusive and necessary housing growth over the lifetime of plan. Whilst the priority of development on brownfield is supported, the proportion of new homes to be delivered in Manchester and Salford is disproportionate to local housing requirements elsewhere across the districts.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the	Metacre Ltd

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		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] .	
JPH1_JPH1.55	There is a clear disparity between the rhetoric of boosting northern competitiveness and sustaining growth in southern areas and the distribution of growth, with requirements for Bury, Tameside and Trafford below LHN, and Bolton and Oldham only just meeting LHN.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts, including those linked to boosting the competitiveness of the Northern Areas. The targets set out in the plan will deliver the strategy, therefore no change is necessary.	Gladman Developments Redrow Homes Peel L&P Investments (North) Ltd Milnes Gaskell Estate Highgrove Strategic Land Ltd Rowland Homes Ltd NPL Group BDW Trading Ltd Hollins Strategic Land Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership Seddon Homes Ltd Gary Hoerty
JPH1_JPH1.56	If the aspiration is to rebalance the economy of GM and direct growth to the north, this should be achieved by increasing the standard method figure in the northern authorities whilst ensuring that at least the minimum figure is delivered in the southern authorities to ensure market signals do not continue to worsen.	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	Story Homes Limited Redrow Homes Peel L&P Investments (North) Ltd Harworth Group Plc Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land

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		Options Paper [02.01.10] . The targets set out in the plan will deliver the strategy, therefore no change is necessary.	Bellway Homes Ltd EON Plant Ltd Oltec Group Ltd Redrow Homes Limited Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.57	The strategy does not fully recognise the role that good quality housing can play in boosting the competitiveness of northern areas and retaining higher income families in the area.	The plan clearly recognises the role of good quality housing in boosting the competitiveness of northern areas, as set out in the supporting text to JP-Strat 6 at para. 4.48. Therefore no change necessary.	Peter Rowlinson Peel L&P Investments (North) Ltd
JPH1_JPH1.58	Additional greenfield and Green Belt sites should be reassessed in districts such as Bury, Oldham, Rochdale and Tameside with the objective of additional provision in the northern boroughs.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. Sufficient land has been identified in line with the outcomes of the Growth and Spatial Options Paper [02.01.10] to deliver 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.	Metacre Ltd
JPH1_JPH1.59	Concerned about the serious reduction in choice of housing sites in the PfE - in particular for upper market housing in northern districts such as Oldham.	No changes necessary. The plan clearly recognises the role of good quality housing in boosting the competitiveness of northern areas, as set out in the supporting text to JP-Strat 6 at para. 4.48. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	See Appendix
JPH1_JPH1.60	The strategy says very little about the resources needed to bring forward brownfield development in areas of low value such as the northern districts. This is a dangerous approach in areas such as Wigan where over 50% of supply is brownfield.	No changes necessary. No change necessary, the challenges of delivering brownfield land is clearly referenced in the supporting text to Policy JP-H1 at para. 7.17. Further information / evidence in relation to this matter is provided in the Delivery Topic Paper [03.01.05] and the Housing Topic Paper [06.01.03] para. 6.40 to 6.77 which identifies a	Peter Rowlinson

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		broad range of opportunities to support the delivery of more challenging sites.	
JPH1_JPH1.61	Higher levels of housing in the northern districts is supported, however we dispute that this reflects the availability of suitable sites.	Support noted. It is considered that sufficient housing land supply has been identified in the northern districts to ensure that the strategy can be delivered.	See Appendix
JPH1_JPH1.62	Rebalancing in favour of the northern areas cannot be achieved if more suburban family housing sites are not made available, especially sites for upper market housing. Concerned that this may not be addressed in Local Plans (for example recent Oldham Local Plan consultation).	No changes necessary. It is considered that sufficient housing land supply has been identified in the northern districts to ensure that strategy can be delivered. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	See Appendix
JPH1_JPH1.63	Bolton is projected to experience the lowest level of population growth of any of the GM authorities, and a fall in households with children. There is a need to attract and retain families and a working age population to support the Borough's economic aspirations and strategic employment allocations.	No changes necessary. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to boost the competitiveness of the Northern Areas, which includes Bolton. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . We consider the targets for Bolton are consistent with the overall vision, objectives and the spatial strategy of the plan. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.	Wainhomes (NW) Ltd
JPH1_JPH1.64	The housing targets for Bury are not consistent with JP Strat6 and are not proportionate to the other boroughs covered by the same policy. Bury's targets are insufficient to deliver the strategic aims of the plan and will restrict this part of the plan area from performing.	No changes necessary. We consider the targets in Bury are both consistent with JP-Strat 6 and the overall vision, objectives and the spatial strategy of the plan. 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	Miller Homes Hollins Strategic Land HIMOR, Redrow Homes Limited and VHW Partnership

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	Bury will need to try and attract and retain those of working age order to support economic growth whilst ensuring sufficient and appropriate housing is delivered to meet the needs of its aging population.	supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	
JPH1_JPH1.65	Bury's target should be increased to meet the needs of the growing population but also to compensate for under delivery over the last plan period. The target below LHN cannot be supported.	No changes necessary. As set out in National Planning Practice Guidance on Housing and economic needs assessment Paragraph: 011 Reference ID: 2a-011-20190220, the affordability adjustment applied as part of the standard method takes account of past under-delivery therefore it is not a requirement to specifically address under-delivery separately. The approach to establishing the individual district housing targets is considered consistent with NPPF and NPPG, which states at paragraph 013 Reference ID: 2a-013-20201216 that it is for the relevant strategic policy-making authority to distribute the total housing requirement across the plan area. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative spatial options and concludes that Option 4(b), a variant of the hybrid spatial option of the GMSF 2019, represents the best fit with the overall ambitions of the nine districts. Therefore no change is considered necessary, as the targets set out in the plan will ensure that the spatial strategy can be delivered.	Miller Homes Hollins Strategic Land
JPH1_JPH1.66	Initially thought that Bury was taking on more responsibility for providing housing than other areas - can now see that this is not the case and that other areas are fairly sharing the load, however I do think that there is too much focus on just two Bury areas which will become giant housing estates.	No changes necessary. Selection Background Paper [03.04.01] section 6 sets out the methodology applied to the Site Selection process. The Site Allocations policies set out in Chapter 11 of the plan, supported by the evidence set out in the Site Allocations Topic Papers demonstrate the type of developments proposed and provide the policy framework to ensure that the principles of good place making will be achieved. Therefore no change is considered necessary.	Jane White

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JPH1_JPH1.67	There appears to be a disconnect between the delivery of new homes and the employment requirements in Bury, with 4.4% of housing and 7.6% of employment supply. No evidence has been prepared in relation to the impact of this on commuting patterns.	No change necessary. The majority of the employment land supply in Bury is provided through Site Allocation JPA 1.1, which is a nationally significant location for new employment-led development that will help to deliver a significant jobs boost to wider northern and eastern parts of the conurbation in line with the spatial strategy. Therefore the scale of this employment opportunity offers wider benefits on a regional and national level. The allocation policies are supported by a proportionate evidence base, including transport evidence, which is summarised in the relevant Site Allocation Topic Papers .	Hollins Strategic Land
JPH1_JPH1.68	There is currently an over reliance on Manchester and Salford at the expense of meeting needs in other districts, and the aspiration to boost northern competitiveness.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] .	Metacre Ltd Murphy Group Rosedale Property Holdings Limited
JPH1_JPH1.69	We are concerned at the suggestion that all of the 35% uplift applied to Manchester has to be met within Manchester City's boundaries alone. Adopting such a rigid stance is not a statutory requirement, and it would be logical to allow some of the needs to be met in any of the other districts.	No changes necessary. National Planning Practice Guidance Paragraph: 035 Reference ID: 2a-035-20201216 clearly states that the increase in the number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves.	Highgrove Strategic Land Ltd Rowland Homes Ltd Miller Homes EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Oltec Group Ltd Hollins Strategic Land

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JPH1_JPH1.70	Manchester City Council alone cannot meet circa 3500 homes per year over a sustained period of time.	No changes necessary. The target for Manchester is based on Manchester City's local housing need, which is expected to be met in the city area. The city has seen a recent upward trend in the level of housing completions. As stated in Housing Topic Paper [06.01.03] Table 6.3, the City of Manchester has identified a total supply of 59,576 units. This provides a 5% buffer against their overall target of 56,528 units over the plan period (an average of 3,533 per year). The plan sets out a clear monitoring strategy to take account of any future changes in circumstances.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Boys and Girls Club of Greater Manchester
JPH1_JPH1.71	There is a disproportionate housing burden in the Oldham Borough upon the residents of just two wards, Crompton and Shaw.	The Site Selection Background Paper [03.04.01] section 6 sets out the methodology applied to the Site Selection process. Policy JP-P1 provides an appropriate framework for place-making and existing communities and seeks to respect and acknowledge the character and identity of localities. Therefore no change is considered necessary.	Howard Sykes
JPH1_JPH1.72	The increased target for Rochdale is welcomed but is not as large a margin as it might appear when considering Bury will only meet 76% of its need and LHN ignores the effects of economic growth. The opportunity to rebalance the economy and deliver enhanced housing provision should be taken.	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The level of growth planned for Rochdale is consistent with the spatial strategy, therefore no change is necessary.	Persimmon Homes North West
JPH1_JPH1.73	There is no unmet housing need in Rochdale to justify building on the Green Belt. There are enough brownfield sites in Rochdale to meet nearly all of the housing need, potential for	No changes necessary. The level of growth planned for Rochdale is consistent with the spatial strategy, vision and objectives of the plan.	Save Greater Manchester's Green

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	more to become available and to increase densities close to transport hubs. A comprehensive review of brownfield sites and the potential of Rochdale town centre should be carried out.	The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts.	Belt (SGMGB) - Rochdale Groups Anthony Tattersall
JPH1_JPH1.74	The scale of the housing requirement for Salford is overstated. The population of Salford is forecast to increase by 31,000 between 2020 and 2037, yet 26,500 (target) - 36,700 (supply) houses are proposed.	No changes necessary. The level of growth planned for Salford including a significant proportion of high density apartments in locations such as City Centre Salford and Salford Quays is consistent with the spatial strategy, vision and objectives of the plan.	Jamie Bentham Ian Hubbard
JPH1_JPH1.75	The plan will do little to address the For Tameside, the target falls short of LHN over the entire plan period. The effects of past under delivery will be exacerbated.chronic housing shortfall in Tameside. There is also an uneven distribution of sites within Tameside, solely in the south of the Borough.	No changes necessary. The level of growth planned for Tameside is consistent with the spatial strategy, vision and objectives of the plan. The Site Selection Background Paper [03.04.01] section 6 sets out the methodology applied to the Site Selection process. In addition to the proposed site allocations in Tameside there are a range of sites identified through the SHLAA and available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] .	David Morris Metacre Ltd
JPH1_JPH1.76	There is a clear disparity between LHN within Trafford and the amount of new housing proposed. We consider this approach to be unsound based on the SHMA and NPPF para 23. Further site allocations are needed in Trafford, in order to create more choice and opportunity within a market which is currently lacking supply, as reflected in affordability issues.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The target for Trafford is consistent with this strategy.	Church Commissioners for England Royal London Asset Management Highgrove Strategic Land Ltd Rowland Homes Redrow Homes Trafford Hollins Strategic Land

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		Sufficient land has been identified in Trafford to meet the target set out in Policy JP-H1.	
JPH1_JPH1.77	Wigan can more than meet its LHN from existing land supply. The plan is not justified against the site selection criteria in 03.04.01 Site Selection Background Paper where it states “Where a single district has sufficient land supply to meet its own LHN and this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt”.	No changes necessary. The target for Wigan is consistent with the spatial strategy. The 100% of LHN rule referred to in para. 5.7 of the Growth and Spatial Options Paper [02.01.10] does not preclude the release of Green Belt.	Lisa Powell Robyn Powell Sam Powell
JPH1_JPH1.78	Number of houses built or under construction in southern half of Wigan MBC exceeds our share of development.	No changes necessary. The houses built or under construction were established through other plans or planning applications, separate to the PfE plan. This comment is therefore outside the scope of PfE.	Thomas Michael Norris
JPH1_JPH1.79	The reduction in Wigan's target compared to previous iterations of the plan is disproportionate compared to other districts. Wigan's target should be increased. Wigan has demonstrated a strong rate of housing delivery and would be able to boost delivery if there are suitable sites available. The housing delivery test for Wigan shows that demand is at 137% of housing need, which is higher than the plan flexibility allowance of 120%. This is considered not to allow for sufficient flexibility given uncertainties over proposed supply. Some additional sites are therefore necessary.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . Wigan's target is consistent with the strategy. As set out in Policy JP-H1 each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in the plan, with consideration given to appropriate actions if required.	Harworth Group Plc Barratt Manchester Limited LQ Estates and Trafford HT Miller Homes Peter Rowlinson
JPH1_JPH1.80	It is perverse that PfE is proposing a reduction in housing development in Wigan at the start of the plan period, when compared to the Core Strategy target and recent completions.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation	Persimmon Homes North West Morris Homes (North) Ltd

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		<p>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]</p> <p>As stated in para.7.16 - 7.18 of the Places for Everyone plan, it is considered appropriate to identify a phasing trajectory which is realistic and which will result in housing being delivered as planned over the life of the plan. The approach to stepped targets is considered to be consistent with NPPF and NPPG.</p>	LQ Estates and Trafford HT
JPH1_JPH1.81	Allocations have been based on GM wide need, not down to a local level.	No changes necessary. Places for Everyone is a joint plan of 9 districts, therefore it is appropriate to adopt a consistent, plan wide approach to site selection as set out in the Site Selection Background Paper [03.04.01] .	Jane Barker
JPH1_JPH1.82	Concentrating large developments in an area has a huge impact on existing communities. Should invest in current housing and communities instead, including empty homes. Spread development across the borough rather than concentrating on large sites.	<p>No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future, is a key part of the plan. Para. 9.8 acknowledges that a key challenge will be to ensure that new development is fully integrated into places that already have a strong identity. Policy JP-P1 provides an appropriate framework for existing communities and seeks to respect and acknowledge the character and identity of localities. Therefore no change is considered necessary.</p> <p>As stated in Places for Everyone para. 7.11 it is important to make the most of the existing housing stock, and efforts will be made to further reduce long-term empties but any significant further reduction in</p>	Julie Riley

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		vacancies could begin to make it more difficult for people to move home. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement. In any event, Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock.	
Phasing			
JPH1_JPH1.83	Reference to the stepped requirement should be removed. There is no evidence to justify stepped targets.	Disagree. As stated in para.7.16 - 7.18 of the Places for Everyone plan, it is considered appropriate to identify a phasing trajectory which is realistic and which will result in housing being delivered as planned over the life of the plan. The approach to stepped targets is considered to be consistent with NPPF and NPPG and is supported by evidence summarised in the Housing Topic Paper [06.01.03] para. 6.32-6.39. The land supply trajectory is considered to be realistic based on widely accepted lead in times and delivery rates for greenfield/ Green Belt sites, the viability challenges presented by some of the brownfield land supply and the need to develop new markets for housing in some parts of the conurbation, which is vital to delivering the overall strategy for Greater Manchester but may take some time to achieve. Therefore no change is considered necessary.	See Appendix
JPH1_JPH1.84	Backloading the housing requirement to the later years of the plan period is the antithesis of being positively prepared and increasing housing delivery. The trajectory should relate to housing need and boosting housing delivery, seek to address the backlog and respond to the Covid-19 pandemic. The approach taken will result in rapidly increasing house prices, worsening affordability, homelessness and poverty.	Please see response to row JPH1_JPH1.83. The process of local plan review will be used to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable. Therefore no change is considered necessary.	See Appendix

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	A 35% buffer on supply at the start of the plan period is excessive and over cautious.		
JPH1_JPH1.85	There is no indication that the pandemic will suppress housing delivery over the next 4 years.	The approach taken is justified by the evidence from the Covid-19 and PfE Growth Options paper [05.01.03] , which considers the implications of the Covid-19 pandemic and finds that there is still a significant degree of uncertainty regarding the impact of the pandemic and economic growth and future housing needs. The process of local plan review will be used to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable. Therefore no change is considered necessary.	See Appendix
JPH1_JPH1.86	<p>The NPPF requires front-loading of housing growth to address persistent under delivery of housing.</p> <p>Targets should be increased to LHN+20% in areas such as Bolton and Oldham at the start of the plan period to account for persistent under delivery.</p>	<p>Disagree. As set out in National Planning Practice Guidance on Housing Supply and Delivery Paragraph: 021 Reference ID: 68-021-20190722 a stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.</p> <p>As set out in National Planning Practice Guidance on Housing and economic needs assessment Paragraph: 011 Reference ID: 2a-011-20190220, the affordability adjustment applied as part of the standard method takes account of past under-delivery therefore it is not necessary to specifically address under-delivery separately, this would in effect amount to double counting.</p> <p>The 20% buffer on the five year supply required by NPPF where there has been significant under delivery over the previous three years is applied after the target has been set, and relates to the supply of sites brought forward from later in the plan period.</p>	<p>Hollins Strategic Land J and B Fitton HIMOR Group Oltec Group Ltd Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Oltec Group Ltd Jones Homes (North West) Ltd PD Northern Trust Asset Management</p>
JPH1_JPH1.87	The proposed delivery rates at the start of the plan period are lower than recently achieved delivery rates, which is illogical.	The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the	<p>Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited</p>

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		<p>nine districts. We are therefore planning for the LHN, not planning on the basis of past delivery rates.</p> <p>The approach to stepped targets is considered to be consistent with NPPF and NPPG.</p> <p>No change necessary.</p>	<p>Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Bellway Homes Ltd Miller Homes Barratt Manchester Limited Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.88	<p>The minimum need of 10,305pa does not represent a 'significant change' from earlier requirements, where the 9 districts planned for an average of 9,195pa between 2003 and 2015. The authorities' ability to make this step up is proven by this target being exceeded on occasions recent years.</p>	<p>As stated in para. 7.18 of the Places for Everyone plan the masterplanning and infrastructure investments required to support the development of some sites, including many of the allocations in the Plan, means that they may only produce large numbers of new dwellings in the latter phases of the plan period. The land supply trajectory is considered to be realistic based on widely accepted lead in times and delivery rates for greenfield / Green Belt sites. In some parts of the conurbation it will be necessary to develop new markets for housing, which is vital to delivering the overall strategy for Greater Manchester but may take some time to achieve.</p> <p>The approach to stepped targets is considered to be consistent with NPPF and NPPG, therefore no change necessary.</p>	<p>Peel L&P Investments (North) Ltd</p>
JPH1_JPH1.89	<p>The proposed phasing reveals a lack of confidence in the ability to deliver the brownfield sites on which PfE relies, which is understandable in light of previous delivery forecasts and viability issues.</p>	<p>The approach to stepped targets is considered to be consistent with NPPF and NPPG, therefore no change necessary.</p> <p>A significant proportion of the land supply in the early years of the plan is made up from sites within the urban area, the majority of which are on previously developed land. Many of these sites therefore face challenges which will need assistance to kick-start their delivery. Greater</p>	<p>Persimmon Homes North West Morris Homes (North) Ltd Peel L&P Investments (North) Ltd</p>

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		<p>Manchester has been lobbying central Government for many years, and will continue to do so, to secure funding to enable it to achieve the common goal of delivering as many homes on brownfield land as possible and keeping to a minimum the need to release Green Belt land. A number of key schemes within Greater Manchester have successfully been awarded funding through the Housing Infrastructure Fund and Greater Manchester has also recently been awarded funding through the Brownfield Housing Fund. This type of funding, together with proactive work in relation to housing delivery by each of the local planning authorities will help to ensure that delivery will keep apace as anticipated in this Plan.</p>	<p>Hollins Strategic Land Miller Homes Barratt Manchester Limited HIMOR Group Oltec Group Ltd Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land</p>
JPH1_JPH1.90	<p>An improved range of additional deliverable sites (e.g. smaller Green Belt sites) should be allocated that can deliver in the immediate term and early stages of the plan period without public funding.</p> <p>NPPF requires a good mix of sites to be provided that can deliver across the plan period. Stating that a stepped target is required is an acknowledgement that the requirement for a good range of sites has not been met.</p>	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.</p> <p>We consider that the NPPF requirements have been met. The land supply identified in the plan is considered to be sufficient to meet both the identified needs and the overall vision and objectives of the plan. No change necessary.</p>	See Appendix
JPH1_JPH1.91	<p>The stepped targets cannot be justified by the need for assistance to deliver PDL sites in the urban area, given the extent of the supply in Manchester and Salford in the first 4 years.</p>	<p>The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. The targets in Manchester and Salford are not stepped due to the significant pipeline of dwellings that are either under construction or have planning permission. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p> <p>The land supply trajectory is considered to be realistic based on widely accepted lead in times and delivery rates for greenfield/green belt sites and confirmed viability challenges with some of the brownfield land</p>	<p>Story Homes Limited Morris Homes Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey</p>

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		supply. The approach to stepped targets is considered to be consistent with NPPF and NPPG, therefore no change necessary.	
JPH1_JPH1.92	<p>The housing trajectory of the baseline supply shows that the pipeline exists for much higher provision early in the plan period with a risk of reduced supply during its latter phase, although there are evidenced viability concerns.</p> <p>Large sites over 1000 homes account for 22% of overall supply and the allocations are expected to make their peak contribution in 2028, midway through rather than late in the plan period.</p>	The land supply trajectory is considered to be realistic based on widely accepted lead in times and delivery rates for greenfield / Green Belt sites and confirmed viability challenges with some of the brownfield land supply. The approach to stepped targets is considered to be consistent with NPPF and NPPG, therefore no change necessary.	Peel L&P Investments (North) Ltd
JPH1_JPH1.93	The need for stepped targets as a result of infrastructure required to bring forward large allocations is not applicable to all sites and is not applicable to Bolton which has no allocations.	No changes necessary. The reasons for the stepped target are summarised in para. 7.16 – 7.18 of the plan and are not exclusively related to infrastructure requirements for large allocations.	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.94	The need to develop new markets before delivery (as stated in para. 7.18 of the plan) is not applicable to all areas (e.g. Trafford or Bury).	<p>No changes necessary. As summarised in the Delivery Topic Paper [03.01.05] section 4 the Viability Appraisal identifies viability challenges with a proportion of the housing supply. This is why we have ensured there is a significant buffer on supply at the start of the plan period. Beyond this point there is an assumption that values will rise, enabling new markets to be created supported by funding such as Levelling Up Funding, Town Deals and transport investments, with targets stepping up for 2025-2039 and 2030-2037.</p> <p>The PfE Strategic Viability Assessment Stage 1 [03.01.01] Figure 4.1 shows there are lower value areas in all the 9 PfE districts.</p>	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.95	The stepped targets have been engineered to protect a five year housing land supply position. Such approach is not justified where a pro-active stance could be taken to identify a more resilient supply of sites to enable all districts to demonstrate a 5 year supply against their overall target.	<p>The reasons for the stepped targets are summarised in para. 7.16 – 7.18 of the plan. The approach to stepped targets and the land supply trajectory are considered to be consistent with NPPF and NPPG.</p> <p>They are supported by a proportionate evidence base, summarised in the Housing Topic Paper [06.01.03]. No change necessary.</p>	Story Homes Limited Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Steven Breheny

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			Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey Wainhomes (NW) Ltd
JPH1_JPH1.96	The proposed housing supply will not be capable of meeting a rolling 5-year supply over the whole plan period, and the evidence of 5YS is opaque. It is evident that there is insufficient supply in at least the last 7 years of the plan period.	The land supply includes a significant buffer at the start of the plan period, which is moved forward from later in the plan period, as expected by NPPF para. 74. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN over the whole plan period. As stated in Policy JP-H1 each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan, including reviewing policies in this plan if necessary.	Steven Breheny
JPH1_JPH1.97	When the plan is more than 5 years old, housing land supply will be assessed against LHN. There is therefore no guarantee that the plan will ever revert to the higher housing requirement, and may instead undertake a 'footnote 39' review of the plan.	Comment noted. Policy JP-H1 is considered to be consistent with NPPF.	Hollins Strategic Land HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Wainhomes (NW) Ltd
JPH1_JPH1.98	The policy is not meeting the needs of the area in a timely manner due to the use of the Sedgefield Method without justification and contrary to NPPF para 69. The Liverpool method should be used.	No changes necessary. We consider that the use of the Liverpool method is justified by evidence, as allowed for by NPPG Housing supply and delivery Paragraph: 031 Reference ID: 68-031-20190722. As stated in para 7.19 of the plan, whilst the trajectory in this plan is considered to be realistic, given the relatively unknown impacts of Covid-19 at this point in time, it is possible that delivery could in fact be different to that currently anticipated. Therefore, in such an eventuality the surplus or	Gary Hoerty Gary Hoerty Morris Homes Oltec Group Ltd Redrow Homes Limited BDW Trading Ltd

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		<p>shortfall will be distributed over the remaining years of the plan. In this way, any over delivery within a local planning authority area will not result in that authority being adversely affected when it comes to calculating their five-year housing land supply.</p> <p>As set out in Policy JP-H1 each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan.</p>	<p>Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership</p>
JPH1_JPH1.99	<p>It does not seem realistic for Bolton's delivery rates to step up in the absence of any new sources of supply. A shortfall of 6,160 dwellings will exist when considered against the requirement (which is too low).</p> <p>It is unclear how the delivery rates in Bolton would increase by 73.5% between 2021-2025 and 2030-37. Bolton has consistently failed to achieve a 5 year supply based on reliance on regeneration sites with no Green Belt allocations proposed. The approach is not justified and will lead to a prolonged failure to meet housing need.</p>	<p>No changes necessary. The Housing Topic Paper [06.01.03] Appendix A provides a summary of Bolton's housing land supply position, which is 3,401 units from 2020-2025; 6,496 from 2025-2030 and 5,279 units from 2030-2037.</p> <p>The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites.</p>	<p>Redrow Homes Rowland Homes Ltd Bellway Homes Ltd Persimmon Homes North West BDW Trading Ltd Jones Homes (North West) Ltd</p>
JPH1_JPH1.100	<p>Rochdale should be seeking to front load its housing delivery due to the large scale level of demolitions and clearance planned to take place over the next 10 years.</p>	<p>The housing targets for Rochdale are in line with the strategy and consistent with the NPPF and NPPG.</p> <p>The targets are based on net additional dwellings. Loss of housing due to demolitions is accounted for when assessing net housing completions. Therefore no changes are considered necessary.</p>	<p>GLP Trows LLP and BDW Trading Limited</p>
JPH1_JPH1.101	<p>We support the proposed approach to stepped targets.</p>	<p>Support noted.</p>	<p>CPRE</p>
Existing supply			
JPH1_JPH1.102	<p>The plan significantly overestimates the capacity and deliverability of the baseline supply of housing land, and</p>	<p>The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF. As a result a significant amount of the land supply identified is in some of the more</p>	<p>Story Homes Limited Bellway Homes Ltd</p>

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	therefore significantly underestimates the level of Green Belt housing allocations required.	challenging areas of the conurbation, and as identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. Sufficient housing land has been identified in to meet the needs of the plan area up to 2037, no change necessary.	Housebuilding Consortium Taylor Wimpey Rowland Homes
JPH1_JPH1.103	<p>The evidence base lacks vital components including a SHLAA. The Housing Land Supply Statement falls well short of comprising a SHLAA. The available information is completely inadequate to justify the claimed contribution of urban supply to meet GMs housing needs. Responsibility for preparing a SHLAA lies with the strategic policy making authority.</p> <p>In view of the SHLAAs not being published as part of the evidence base for consultation it has to be accepted that the 9 authorities are not seeking to corroborate the urban supply, and will instead do so through Local Plans (which must then allow for futher GB release if it will not deliver as expected).</p>	No changes necessary. The existing housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01].	Story Homes Limited Highgrove Strategic Land Ltd Rowland Homes Ltd Bellway Homes Ltd PD Northern Steels Hollins Strategic Land Housebuilding Consortium Taylor Wimpey EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management PD Northern Trust Asset Management
JPH1_JPH1.104	There is insufficient information to enable judgements about the suitability, availability or deliverability of the supply, or about the assumptions used to create the trajectory set out in the HLSS. This is a fundamental flaw which must be properly addressed before the PfE DPD proceeds.	No changes necessary. The Housing Topic Paper [06.01.03] Appendix A section 3 sets out the methodology used which follows the Planning Practice Guidance on Housing and economic land availability assessment . The sites are set out in the PfE Land Supply Data (Housing) spreadsheet [03.03.01].	See Appendix

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JPH1_JPH1.105	If the 9 SHLAAs are submitted as part of the examination process, sufficient time must be afforded to all parties to review this evidence in detail.	No changes necessary. The existing housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] .	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels Hollins Strategic Land
JPH1_JPH1.106	There is a lack of consistent approach as each district has prepared its own SHLAA, and some are well out of date (e.g. Bolton - 2008). A comprehensive SHLAA with a single methodology should be prepared, as envisaged by NPPF para. 68.	No changes necessary. Although each district undertakes their own SHLAA as they are best placed to do this having the local knowledge and necessary resources, we do have a standard approach based on the methodology set out in Planning Practice Guidance on Housing and economic land availability assessment . All the districts undertook standard optimisation work as set out in the Housing Topic Paper [06.01.03] Appendix A.	Story Homes Limited Highgrove Strategic Land Ltd Rowland Homes Ltd Bellway Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Hollins Strategic Land Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.107	The published SHLAAs for each district are not consistent with the claimed supply in Table 7.1 (with the exception of Rochdale).	No changes necessary. The existing PfE housing land supply is summarised in the Housing Topic Paper [06.01.03] Appendix A, available to view on the PFE Consultation 2021 Map MappingGM and listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] and is consistent with Table 7.1 of the plan. District published SHLAAs rightly include homes that are expected to be delivered beyond the end of the plan period in 2037, which are not included in the PfE supply in Table 7.1, as this correctly relates solely to homes which are expected to be delivered within the plan period. In a limited number of cases sites may be included in the district SHLAA but	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey

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		<p>removed from PfE land supply where they would result in double counting of units to be delivered within proposed PfE site allocations. In the case of Manchester City Council, as a result of having to accommodate the 35% cities and urban centres uplift in its LHN an interim 2021 housing land supply emerged for Manchester. This interim update has fed into Table 7.1 and the published PfE land supply, and subject to final adjustments will be incorporated within the next annual update of the Manchester SHLAA during the normal cycle of land availability updates across Greater Manchester.</p> <p>Whilst the PfE land supply evidence base covers 2020 to 2037, an adjustment is made to take account of estimated completions in 2020/21. Table 7.1 therefore accurately reflects PfE land supply. The land supply for all districts will be updated from its 2020 base date as part of the annual process of land supply updates and we anticipate that these future updates will formally feed into the Examination process in due course.</p>	
JPH1_JPH1.108	Some of the areas identified on the SHLAA map have already been developed and people are living in the new houses.	No changes necessary. The housing land supply includes sites under construction, which may include some completed units within the site boundary whilst the remainder of the units are still to be completed. The based date of the land supply is 1 April 2020, however an estimation of completions has been taken into account in column 8 of table 7.1 of the plan.	Irene Thompson
JPH1_JPH1.109	The existing supply has been artificially inflated with the sole intention of trying to railroad a plan through with as little Green Belt release as possible regardless of the deliverability of the claimed supply.	The Housing Topic Paper [06.01.03] Appendix A section 3 sets out the methodology used which follows the Planning Practice Guidance on Housing and economic land availability assessment . The Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF. As a result a significant amount of the land supply identified is in some of the more challenging areas of the conurbation, and as identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. As stated in the	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey

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		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 necessary.	
JPH1_JPH1.110	Very optimistic predictions are being made about delivery on the existing supply. There is insufficient evidence to justify the assumptions made for the SHLAA sites, including the proposed densities. No evidence has been provided to demonstrate the availability, achievability or developability of the SHLAA sites. Much of the existing supply could have come forward already if it were genuinely developable. There continue to be significant doubts about the deliverability and viability of a substantial proportion of the supply.	Sufficient housing land has been identified in to meet the needs of the plan area up to 2037. The land has been identified in a range of site sizes, predominantly on land within the urban area. The housing land supply is summarised in Places for Everyone Table 7.1 and the Housing Topic Paper [06.01.03] . The Housing Topic Paper [06.01.03] Appendix A section 3 sets out the methodology used which follows the Planning Practice Guidance on Housing and economic land availability assessment . 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. Additionally, 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. Therefore, no changes are considered necessary.	See Appendix
JPH1_JPH1.111	There is an over reliance on brownfield sites, for which there will be insufficient public funding to deliver the housing required, and will fail to deliver affordable housing.	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites.	See Appendix

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		<p>It is important to note that not all brownfield sites require public funding. The Delivery Topic Paper [03.01.05] provides further information on delivery and summarises the outcomes of the Viability Appraisal. 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. Therefore, this approach is considered to be consistent with the NPPF and no changes are considered to be necessary.</p>	
JPH1_JPH1.112	<p>There is insufficient Government funding to remediate brownfield sites. GMCA should continue to lobby central Government for further funding to remediate brownfield sites and deliver the necessary infrastructure.</p>	<p>As set out in PfE para. 1.44 and 1.45 we will continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. The recently announced Brownfield Land Fund is targeted at Combined Authorities and begins to help to address viability issues across the conurbation, but it is not enough. We are bidding for more funding but further discussions with Government are critical to enable the full potential of our brownfield land supply to be realised. As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified, as the Plan seeks to promote the development of brownfield land. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this. Recent delivery rates demonstrate that the targets are deliverable and therefore, no changes are considered necessary.</p>	<p>Howard Sykes Debbie Abrahams</p>
JPH1_JPH1.113	<p>Much of the supply is in lower value areas, as defined by the Strategic Viability Report, including a 31% of the 5 year supply,</p>	<p>The Delivery Topic Paper [03.01.05] provides further information on delivery and summarises the outcomes of the Viability Appraisal.</p>	<p>See Appendix</p>

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	<p>even with the questionable assumption that all of the supply from large sites within the 5 year supply is viable.</p> <p>The conclusions of the Strategic Viability Appraisal are clear that just under 70% of the supply is deliverable with 100% market housing, 31% is unviable.</p>	<p>As set out in section 4, the underlying message of the viability testing is that most development types can meet the policy requirements of the draft PfE in the medium to high value areas (VA1-3). However, in low value areas of Greater Manchester, there is a need for public sector intervention to achieve viable scheme delivery and to meet the requirements of the draft PfE. Development is happening in the lower value areas, and a range of public sector interventions are being pursued. As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p> <p>The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 also identifies a broad range of opportunities to support the delivery of more challenging sites. Therefore, no changes are considered necessary.</p>	
JPH1_JPH1.114	<p>The benchmark land values, profits and costs are underestimated and the position is actually worse than stated.</p>	<p>The approach taken in the Viability Assessment is considered to be robust and consistent with the NPPF and NPPG. Therefore, no changes are considered to be necessary.</p> <p>The Delivery Topic Paper [03.01.05] Section 5 summarises the approach taken and the outcomes of the Viability Appraisal.</p>	<p>The Strategic Land Group Story Homes Limited Peel L&P Investments (North) Ltd Hollins Strategic Land HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land</p>

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			Seddon Homes Ltd Wainhomes (NW) Ltd
JPH1_JPH1.115	The definitions of deliverable and developable require a site to be viable. The evidence base clearly demonstrates that large elements of the supply are not viable and should therefore be discounted from the supply.	No changes necessary. The plan recognises that ensuring sufficient flexibility in the supply in the first years of the plan will not be sufficient on its own to ensure housing delivery happens as planned in paragraph 7.12. A significant proportion of the land supply in the early years of the plan is made up from sites within the urban area, the majority of which are on previously developed land. Many of these sites therefore face challenges which will need assistance to kick-start their delivery. 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. Furthermore, a number of key schemes within Greater Manchester have successfully been awarded funding through the Housing Infrastructure Fund and Greater Manchester has also recently been awarded funding through the Brownfield Housing Fund. This type of funding, together with proactive work in relation to housing delivery by each of the local planning authorities will help to ensure that delivery will keep pace as anticipated in this Plan.	The Strategic Land Group Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Hollins Strategic Land EON Plant Ltd Seddon Homes Ltd HIMOR Group HIMOR Group Oltex Group Ltd Hollins Strategic Land Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land LLP Hollins Strategic Land Hollins Strategic Land Seddon Homes Ltd Wainhomes (NW) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.116	There is an over reliance on unallocated land for housing. There is no guarantee that the sites will come forward or planning permission would be granted or implemented, and many of the sites are in active employment use and some have unknown ownership. SHLAA sites have not delivered as expected.	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible.	See Appendix

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		<p>The detailed supply of sites listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] together with the proposed site allocations are considered to represent a suitable housing land supply and provide a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN. 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. This approach is considered to be consistent with the NPPF and therefore no changes are necessary.</p>	
JPH1_JPH1.117	<p>The over reliance on SHLAA sites as the majority source of potential supply undermines the plan-led system and is not credible. This is contrary to NPPF para. 15 and 20.</p>	<p>No changes necessary. The strategic policies set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for housing as required by NPPF. The evidence base, particularly the Housing Topic Paper [06.01.03] and the PfE Land Supply Data (Housing) spreadsheet [03.03.01], is considered to be of sufficient detail to support a high level strategic plan such as PfE which sets out an overall strategy for the pattern, scale and design quality of places and which makes sufficient provision for housing, amongst other things. The detailed supply of sites listed in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] together with the proposed site allocations are considered to represent a suitable housing land supply and provide a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.</p> <p>Therefore, this approach is considered to be consistent with NPPF, and further details are to be provided in district local plans as anticipated in PfE and in accordance with the NPPF.</p>	<p>The Strategic Land Group D Jones</p>
JPH1_JPH1.118	<p>Analysis of previous SHLAAs shows that a large proportion of the developable supply does not come forward as expected. No allowance has been made for this.</p> <p>Evidence suggests that between 10-20% of planning permissions never materialise.</p>	<p>As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. This is in line with the non-delivery rate of between 10 and 20% proposed by the comment and it is considered that represents a reasonable degree of flexibility in the housing land supply</p>	<p>See Appendix</p>

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	A non-delivery rate should be applied to reflect that some sites will not come forward as expected.	to ensure that we can meet our LHN. Therefore no changes are necessary.	
JPH1_JPH1.119	The supply from student accommodation (3,257 dwellings) cannot be relied upon to form part of the supply without additional information to demonstrate that the student units release housing into the wider market. The standard method makes no allowance for student housing.	No changes necessary. Student accommodation provides additions to the housing stock and is therefore identified within the district SHLAAs where such sites are available, suitable and achievable as required by the NPPF. The approach to including student accommodation within SHLAAs is consistent with the July 2021 housing flows reconciliation guidance published by MHCLG, and the housing delivery test measurement rule book published by MHCLG in July 2018	Story Homes Limited Hollins Strategic Land Bellway Homes Ltd HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.120	The plan fails to make provision for 10% of the housing requirement to be provided on sites no larger than 1 hectare. The assumed small sites windfall allowance is not an appropriate means or sufficient to meet the NPPF requirement. Small sites should either be allocated in PfE or it should be clarified that these will be allocated through local plans.	No changes necessary. PfE is a strategic spatial plan and all the policies are “strategic policies”. Within this context, Policy H1 provides an appropriate policy framework in relation to scale, distribution and phasing of new housing development, supported by proportionate evidence. As set out in paragraph 11.2 district local plans will allocate sites from the existing land supply. It is not considered necessary to specify that 10% of these sites must be of less than 1Ha, as this is set out in NPPF at paragraph 69 and would amount to unnecessary duplication.	James Stevens
JPH1_JPH1.121	There is no consistency in making an allowance for losses. While all have included a windfall allowance, only some authorities have balanced this out by making predictions of the likely future losses. No allowance for losses has been included (for Wigan, Salford, Tameside, Trafford or Bury). We are concerned that the supply is not genuinely a net supply and is overinflated. The allowance for losses in Bolton and Oldham should be higher.	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A section 7.3 with the exception of Bolton, Manchester and Rochdale, all districts SHLAAs are based on net completions on identified sites. This means that in most cases there is no need to make a separate allowance for demolition, site clearance or change of use to non-housing uses, as these are already factored into the baseline supply. Bolton, Manchester and Rochdale record information on gross housing supply and deal with the issue of demolitions / losses separately. A small allowance is included for	See Appendix

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		Oldham to account for planning permissions that would result in the loss of a dwelling that are not included within their SHLAA (not including demolition and replacement which is already accounted for). Therefore, although there are slight differences in the approach on this point of detail, all methods are considered to be consistent with National Planning Policy.	
JPH1_JPH1.122	The approach to windfall allowances from small sites is inconsistent and there is insufficient evidence to support the approach taken. There is an overreliance on windfall sites in some districts (e.g. Bolton). There is no evidence to suggest that the number of homes from small sites will increase in Wigan. Small sites are a finite resource, and will fall over time. The small sites allowance is an over-estimate.	No changes necessary. The approach taken to calculate the small sites windfall allowance is considered to be consistent with National Planning Policy and is justified by evidence set out in the Housing Topic Paper [06.01.03] Appendix A section 7.2.	See Appendix
JPH1_JPH1.123	There is a strong historical trend of large windfall sites coming forward in GM but the plan makes no allowances for this, despite the fact there are no projected deficits before 2030 in the land supply trajectories. Evidence should have been collated for large and medium sized windfalls and an appropriate allowance made.	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A section 8.2 no specific windfall allowance is proposed for such sites as part of the land supply due to the inherent difficulties in calculating what an appropriate allowance would be for all districts due to lack of consistent and comparable data on past trends. This approach is considered consistent with NPPF and NPPG.	Friends of Carrington Moss Christopher Russell Save Royton's Greenbelt Community Group
JPH1_JPH1.124	If a large sites windfall allowance is not incorporated an alternative would be to delay any Green Belt release until the first 5-year review and re-evaluate the land supply position.	No changes necessary. As explained in row 123, the approach to medium and large windfall sites is consistent with NPPF/NPPG. The approach to releasing Green Belt is both justified through proportionate evidence, particularly that found in the Green Belt Topic Paper and the allocation Topic Papers but also helps to ensure that sufficient supply of land for new homes is delivered within the Plan area	Save Royton's Greenbelt Community Group
JPH1_JPH1.125	It is logical to accept that more windfall sites will become available as a result of Brexit and Covid 19. An allowance for this should be made.	No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further	Christopher Russell Friends of Carrington Moss

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		information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	
JPH1_JPH1.126	It is not clear why further call for sites exercises have not been carried out, or why brownfield has not been prioritised, or why larger unsustainable sites were prioritised over small allocations that would have less impact on local communities.	No changes necessary. It is considered that the calls for additional sites were made at the appropriate times within the plan making process. The Site Selection Background Paper [03.04.01] sets out the approach to the Site Selection. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] .	Friends of Carrington Moss
JPH1_JPH1.127	A comprehensive review of land supply should be undertaken, in collaboration with community groups, Parish Councils and other interested bodies.	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts in line with NPPF and NPPG.	Friends of Carrington Moss
JPH1_JPH1.128	PfE does not recognise that the SHLAA is not a finite supply of land, but rather a living document - as land drops off as it is built on, other land is added. Despite almost 20,000 additional dwellings between 2015 and 2020 across Bury, Oldham, Rochdale, Tameside, Trafford and Wigan, their combined land supply was depleted by less than 6,000 units.	No changes necessary. Whilst we acknowledge that the SHLAA represents the known supply at a set point in time, as set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts and reviews will continue to be undertaken by Districts on a rolling basis in order to take account of the types of changes identified in the comment	Save Royton's Greenbelt Community Group
JPH1_JPH1.129	There is a finite supply of brownfield land within the existing urban area. Overall there has been a slight reduction in the total supply compared to 2019, but this does not include completions that have taken place in 2020/21 and will have reduced the supply further. Land within the existing urban area is a scarce land resource that is diminishing over time.	No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible.	Rowland Homes

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		As explained in para. 3.25 of the Housing Topic Paper [06.01.03] and illustrated in table 7.1 of the Plan, an allowance has been made for housing completions in 2020/21.	
JPH1_JPH1.130	The delivery of brownfield sites in and around town centres is challenging and developers can encounter barriers to delivery. There is also a lack of established residential market in many of the areas. There is a significant risk associated with the likelihood of delivery at the stated yields.	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites and includes specific support for town centres. Recent delivery rates demonstrate that the relevant targets within this area are deliverable and would appear to support the approach outlined in the plan. Therefore no changes are considered to be necessary.	Rowland Homes Crossways Commercial Estates Ltd
JPH1_JPH1.131	The minimum density specifications are not being fully delivered, which has the knock-on effect of placing more pressure on the Green Belt and undermining the core objectives of the plan.	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A section 3.3 site yields of the existing supply have been reviewed by the districts as part of the process of preparing their SHLAAs in line with emerging policy JP-H4 and taking account of local knowledge of the sites. For sites with existing permissions it is assumed that the site yield will not change, unless information from the developer suggests otherwise.	Save Royton's Greenbelt Community Group
JPH1_JPH1.132	Brownfield land registers are not up to date for some districts (Bolton, Rochdale, Tameside) and even where they are up to date their completeness is questioned, for example in relation to mills in Oldham / sites in Tameside.	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts.	Daniel Heap Save Royton's Greenbelt Community Group
JPH1_JPH1.133	Many of the SHLAA sites are unviable, but other available, suitable and deliverable brownfield sites are missing from the potential supply of housing sites (e.g. in Rochdale).	No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts, including in relation to the brownfield land. The district brownfield land registers are held on MappingGM .	EON Plant Ltd

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JPH1_JPH1.134	<p>A detailed analysis of Wigan's supply has identified a shortfall of at least 1600 dwellings.</p> <p>Wigan is over reliant on brownfield sites which will not deliver as anticipated. There are also risks associated with being dependent on large-scale allocations, and Wigan will not be able to demonstrate a five-year housing land supply upon adoption of PfE. A higher target should be set for Wigan and additional sites should be released.</p>	<p>No changes necessary. As set out in the Housing Topic Paper [06.01.03] Table 6.3 a total supply of 18,732 units has been identified in Wigan, against a total target of 15,554 resulting in a buffer of 20%. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can achieve its housing target.</p>	<p>Rowland Homes Seddon Homes Ltd</p>
JPH1_JPH1.135	<p>Completions during 2020/21 may be higher than expected, resulting in a higher deduction from the housing land supply than currently anticipated.</p>	<p>No changes necessary. As stated in the Housing Topic Paper [06.01.03] para. 3.25 the districts have compiled their baseline supply with a base date of 1 April 2020. In order to reflect the start of the plan period moving to 1 April 2021 a deduction was made from the April 2020 land supply to account for housing completions in 2020/21 (see Table 7.1 in the Plan). This is based on the target proposed for 2020/21 in the October 2020 Publication GMSF. Once the 2021 land supply is available, this assumption will be reviewed. However, the approach is considered a reasonable one to ensure the plan could proceed in a timely fashion following the withdrawal of Stockport from the GMSF.</p>	<p>Miller Homes Barratt Manchester Limited LQ Estates and Trafford HT</p>
Delivery			
JPH1_JPH1.136	<p>There is a significant over-reliance on brownfield sites with no planning application status being deliverable.</p>	<p>No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. As set out in Appendix A of the Housing Topic Paper, a comprehensive review of land supply has been undertaken by the districts.</p> <p>The Delivery Topic Paper [03.01.05] provides further information on delivery.</p> <p>The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites. It is important to note that not all brownfield sites require public funding.</p>	<p>Rowland Homes SRH Properties Ltd Seddon Homes Ltd GLP Ltd Seddon Homes Ltd</p>

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JPH1_JPH1.137	The reliance on brownfield land and town centre sites makes it far more likely that the rate of lapsed planning permissions will be higher than typically seen elsewhere and that delivery will be delayed or fail to materialise at all (due to the cessation of existing uses, and complications with land assembly, site clearance and remediation).	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. The Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites and includes specific support for town centres. Recent delivery rates demonstrate that the relevant targets within this area are deliverable and would appear to support the approach outlined in the plan. Therefore no changes are considered to be necessary.	Rowland Homes
JPH1_JPH1.138	The expectations for delivery on brownfield land must be realistic and reflect what developers will actually have the capacity and desire to deliver.	No changes necessary. It is considered that our assumptions in relation to the land supply are realistic. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts and recent delivery rates would appear to support the approach outlined in the Plan. Furthermore, the Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites and includes specific support for town centres.	Kellen Home
JPH1_JPH1.139	Overall, there is a lack of robust evidence to provide sufficient certainty that the baseline land supply and housing allocations proposed will deliver as projected.	No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our housing target.	Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited Rosedale Property Holdings Limited
JPH1_JPH1.140	The PfE's approach to housing delivery is driven by politics rather than evidence.	No changes necessary. Policy JP-H1 and the Plan's Spatial Strategy for housing delivery has been prepared in line with the NPPF.	David Bentley
JPH1_JPH1.141	Insufficient housing land has been identified to meet the needs of the area up to 2037.	No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been	See Appendix.

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		identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.	
JPH1_JPH1.142	PfE fails to ensure that sufficient housing land of the right type is available in the right places and at the right time to support growth (contrary to NPPF para. 8).	No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN. We consider that the land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver a balanced and inclusive growth, thereby achieving the overall spatial strategy. The level of growth and its spatial distribution is in line with the Growth and Spatial Options Paper [02.01.10] .	Peel L&P Investments (North) Ltd
JPH1_JPH1.143	There should be a far clearer commitment to reviewing the plan every 5 years as a minimum, for consistency with NPPF and to ensure that any shortfall in housing delivery and supply is addressed through plan reviews.	No changes necessary. There is a legal requirement to carry out a review at least every five years to assess whether policies need updating. This is applicable to all local plans and is set out in NPPF para. 33 and does not need to be repeated in the plan.	David Morris
JPH1_JPH1.144	Historic delivery has on average been significantly lower than that anticipated for the PfE plan period. The delivery of a greater quantum of development can only be achieved with the right land supply.	No changes necessary. As stated in para. 7.16 of the Places for Everyone plan the average annual housing requirement of 10,305 net additional dwellings per annum was achieved in 2018/19 for the first time since the peak of the housing market in 2006/07, 2007/08, and this achievement also continued in 2019/20 with 12,443 net completions. It has therefore been demonstrated that this level of residential development can be achieved.	Story Homes Limited Highgrove Strategic Land Ltd Rowland Homes Ltd Oltec Group Ltd
JPH1_JPH1.145	The proposed targets are ambitious, particularly in relation to distribution and phasing which far outstrips the current performance of many of the LAs. There will need to be a serious step change in delivery if targets are to be met.	No changes necessary. As stated in para.7.16 of the Places for Everyone plan, it is considered appropriate to identify a phasing trajectory which is realistic and which will result in housing being delivered as planned over the life of the plan. The plan recognises the uncertainty that the pandemic may have on the housing sector in the short-term by ensuring that there is a significant buffer on the housing land supply to meet the proposed phasing. This will enable sufficient	Greater Manchester Housing Providers Highgrove Strategic Land Ltd PD Northern Steels PD Northern Trust Asset Management

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		<p>flexibility, which in turn gives confidence in the delivery rates in the early years of the plan period.</p> <p>As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.</p> <p>Furthermore, the Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites and includes specific support for town centres</p>	<p>PD Northern Trust Asset Management</p>
<p>JPH1_JPH1.146</p>	<p>It is not clear how the PfE will deliver a step change in urban housing delivery over the next 17 years. Sufficient housing allocations will be required to deliver the targets.</p>	<p>No changes necessary. As stated in para. 7.16 of the Places for Everyone plan the average annual housing requirement of 10,305 net additional dwellings per annum was achieved in 2018/19 for the first time since the peak of the housing market in 2006/07, 2007/08, and this achievement also continued in 2019/20 with 12,443 net completions. It is therefore considered that this level of residential development is realistic. Notwithstanding this, the Housing Topic Paper [06.01.03] para. 6.40 to 6.77 identifies a broad range of opportunities to support the delivery of more challenging sites. It is important to note that not all brownfield sites require public funding. The Delivery Topic Paper [03.01.05] provides further information on delivery.</p>	<p>Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd</p>
<p>JPH1_JPH1.147</p>	<p>Some of the local authorities within the plan (such as Bury) have failed to meet housing delivery targets for many years. A plan must prove itself to be deliverable.</p>	<p>No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our housing targets. The Delivery Topic Paper [03.01.05] provides further information on delivery.</p> <p>Paragraph 7.20 of the Plan acknowledges that the work of each local planning authority, in terms of housing delivery, will be key to ensuring that these step changes in delivery rates are achieved and these will be</p>	<p>See Appendix</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		reviewed regularly as part of the housing delivery test process however recent delivery rate would seem to support the approach in the Plan.	
JPH1_JPH1.148	Additional supply needs to be identified in areas that have failed to meet the housing delivery test.	<p>No changes necessary. As noted in the Housing Topic Paper [06.01.03] para. 3.59 a number of districts are required to produce a Housing Delivery Test action plan to identify reasons for past under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve levels of delivery - these action plans identify a wide range of measures to improve levels of delivery as summarised in para. 3.59.</p> <p>The 20% buffer on the five year supply required by NPPF where there has been significant under delivery over the previous three years is applied after the target has been set, and relates to the supply of sites brought forward from later in the plan period, rather than additional supply. The targets in the Plan have been set in line with the Growth and Spatial Options Paper [02.01.10] and are considered consistent with NPPF.</p>	See Appendix
JPH1_JPH1.149	The identification of additional land supply is vitally important, to facilitate long term growth and provide the housing and affordable housing supply required to meet GM's needs. PfE is missing an opportunity to act as a catalyst for growth and deliver sufficient numbers of high-quality family and affordable homes.	No changes necessary. The approach that has been taken is in line with the Growth and Spatial Options Paper [02.01.10] and considered to represent the best fit with the overall objectives of the plan and to perform the best in the Integrated Appraisal.	Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey consortium attachment Story Homes Limited - Consortium Bellway Homes Ltd - Consortium
JPH1_JPH1.150	Past failure to deliver cannot be put down to a lack of demand. There have been extremely high levels of housing need and soaring house prices. Under-delivery can only be put down to the planning system relying upon sites in the urban area and	Please see response to row JPH1_JPH1.148 and JPH1_JPH1.149	See Appendix

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	failing to deliver enough suitable and deliverable land to the market. PfE proposes to repeat past failures.		
JPH1_JPH1.151	There is insufficient evidence for the inclusion of sites within the 5 year supply. The plan would not provide a five year housing land supply on adoption (assessed against LHN). A number of the authorities are unable to demonstrate a 5-year housing land supply, yet PfE does nothing to increase the supply of deliverable land. Additional deliverable and viable sites need to be allocated to ensure that a 5-year supply is provided on adoption.	No changes necessary. The approach to stepped targets is considered robust, supported by proportionate evidence and consistent with NPPF. As identified in the Housing Topic Paper [06.01.03] , sufficient housing land, together with an appropriate buffer, has been identified to meet the identified needs of the PfE districts.	See Appendix
JPH1_JPH1.152	It should be made clear that each district will be responsible for its own five year supply.	No changes necessary. Policy JP-H1 states that each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. This point is further clarified in the Housing Topic Paper [06.01.03] at para. 6.18, where it states that each district will be assessed individually for the Housing Delivery Test and Five Year Supply.	James Stevens
JPH1_JPH1.153	The Places for Everyone plan relies heavily on the cooperation of developers but does not stipulate how developers will be made to achieve targets and what sanctions will apply if they don't.	No changes necessary. As stated in Policy JP-H1 each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. Part of this work will involve working with developers and site promoters as necessary.	See Appendix
JPH1_JPH1.154	The proposed building rates for developments are unrealistic and will not be met, so the plan cannot be considered to be effective and fails this test of soundness. The lack of lead in times, evidence to support build out rates and delivery information for some of the allocations across the PfE evidence base is contrary to NPPF. It takes an average of 8 years from the preparation of an outline planning application to the delivery of the first homes.	No changes necessary. The build out rates for the existing supply have been considered as part of the SHLAA process by each of the districts, as set out in the Housing Topic Paper [06.01.03] Appendix A section 3. Information on phasing of the proposed allocations is found within the individual Site Allocations Topic Papers. The assumptions underpinning the Plan in this respect are considered to be consistent with industry best practice.	See Appendix
JPH1_JPH1.155	The supporting viability evidence is so out of date that it is reasonable to conclude it no longer serves its primary purpose	No changes necessary. We consider the evidence underpinning Policy H1 is considered sufficiently robust and proportionate. A review of the	Lisa Powell Robyn Powell

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	as current, up to date evidence. Simply re-dating documents as a desktop exercise does not mean that the underlying evidence has not changed.	viability evidence base was carried out prior to publishing PfE 2021, which can be found here: Strategic Viability Assessment Stage 1 Report Addendum 2021 [03.01.02] and the Strategic Viability Assessment Stage 2 Allocated Sites Amendments [03.01.04] .	Sam Powell
JPH1_JPH1.156	According to the Stage 2 viability assessment, viability is negative or marginal on a number of proposed allocations. This may result from viability not being adequately assessed as part of the site selection process and substantiates the case to provide additional flexibility by allocating additional deliverable sites.	No changes necessary. Details of the approach taken and outcomes of the viability appraisal of the proposed site allocations is set out in PfE Strategic Viability Assessment Stage 2 Allocated Sites Amendments [03.01.04] . A summary of the results is set out in Section 4.2. The viability evidence underpinning Policy JP- H1 is considered sufficiently robust and proportionate. Furthermore, as shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total housing target. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN.	Persimmon Homes North West Morris Homes (North) Ltd
JPH1_JPH1.157	The land supply figures at over 10,300 pa is well above the long term level of completions. It uses these figures to justify the large scale release of green belt and open land. The housing supply figures should be reviewed to better reflect long term completions and the need to protect green belt and open land from development.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method (an annual average of 10,305) represents the preferred growth option and the best fit with the overall ambitions of the nine districts. A key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.	Gillian Boyle
JPH1_JPH1.158	The release of large areas of Green Belt and open land within the same locality (such as in Bury) will not result in a short term contribution to the housing targets as it will be impossible for the	No changes necessary. The housing targets are considered in line with the conclusions of the Growth and Spatial Options Paper [02.01.10] and the overall vision and objectives of the Plan. The anticipated delivery	Gillian Boyle

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	local markets to absorb the level of housing other than over a very long term period.	rates are considered to be realistic and supported by a proportionate evidence base	
JPH1_JPH1.159	Several of the allocations are dependent upon very expensive infrastructure works if they are to be delivered and meet the ambitious climate and environmental policies within the plan. This will impact delivery.	No changes necessary. The allocations are supported by robust and proportionate evidence, including that around the provision of necessary infrastructure. The phasing of the proposed allocations takes account of this information as necessary, further details in relation to this can be found within the individual Site Allocations Topic Papers.	Gillian Boyle PD Northern Trust Asset Management PD Northern Trust Asset Management Hollins Strategic Land
JPH1_JPH1.160	Adoption of the plan in late 2022 is unrealistic, therefore sites requiring preparation and agreement / adoption of masterplans following adoption of the plan, significant infrastructure investment and planning approval will not deliver until later than anticipated.	No changes necessary. Information on delivery and phasing of the proposed allocations is found within the individual Site Allocations Topic Papers. A significant amount of work has already been undertaken for a number of the sites and forms part of the evidence base for the allocations. Therefore the assumptions underpinning the Plan are considered realistic.	Hollins Strategic Land
JPH1_JPH1.161	PfE does not include a housing trajectory contrary to paragraph 74 of the Framework.	No changes necessary. The stepped targets set out in Places for Everyone Policy JP-H1 Table 7.2 illustrate the expected rate of housing delivery in each of the districts over the plan period. Table 7.2 therefore provides the housing target trajectory for the Plan. The Table reflects the detailed data and graphical representation of the housing target trajectory within the Housing Topic Paper [06.01.03] at Figure 6.1.	See Appendix
JPH1_JPH1.162	The importance of absolute delivery of housing targets as a whole should be emphasised, rather than their pushed delivery on brownfield land. This would ensure that the homes needed are delivered.	No changes necessary. The housing targets are clearly stated in Places for Everyone policy JP-H1 Table 7.2 and will form the basis for monitoring housing delivery.	Emerson Automation Systems UK Limit
JPH1_JPH1.163	The reliance on brownfield land in Bolton is high risk, given the historic failure to deliver. The reliance on the existing supply in Bolton will project forward under delivery, low levels of affordable housing delivery and net outward migration from the Borough.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the	Persimmon Homes North West Redrow Homes Rowland Homes Ltd Bellway Homes Ltd Oltec Group Ltd SRH Properties Ltd

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		<p>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] and the targets have been set in line with this paper.</p> <p>As detailed in para. 7.17 of the plan, as part of Greater Manchester, Bolton will be working proactively in relation to housing delivery to ensure that delivery will keep pace as anticipated in this Plan.</p>	<p>Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd BDW Trading Ltd Jones Homes (North West) Ltd Wainhomes (NW) Ltd</p>
JPH1_JPH1.164	In the case of Oldham, new sites that would have been built have been replaced by housing in Oldham town centre that has no chance of being built or would not be in demand. The same applies to the old mill sites in areas people would not want to live.	<p>No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible.</p> <p>As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by each of the districts in accordance with the NPPG methodology, which together with the proposed site allocations demonstrates sufficient housing land supply with a reasonable degree of flexibility to ensure that Oldham can meet its target. Recent delivery rates demonstrate that the relevant targets within this area are deliverable.</p>	John Shepherd
JPH1_JPH1.165	Trafford is a desirable area and past failures to deliver are a result of lack of supply and sites taking longer to come forward than anticipated. Additional allocations will be required in Trafford.	<p>No changes necessary. As shown in Table 6.3 of the Housing Topic Paper [06.01.03] Trafford has a total supply of 20,698 units, compared to a target of 17,954, which results in a 15% supply buffer when compared to its PfE target. It is considered that this is sufficient housing land supply with a reasonable degree of flexibility to ensure that Trafford can meet its target. Recent delivery rates demonstrate that the relevant targets within this area are deliverable.</p>	<p>Highgrove Strategic Land Ltd PD Northern Steels</p>
Green Belt / Brownfield			
JPH1_JPH1.166	Do not agree with the use of Green Belt.	<p>No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of</p>	<p>Highgrove Strategic Land Ltd PD Northern Steels</p>

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		development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper[06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].	
JPH1_JPH1.167	The plan has not explored all reasonable options for meeting the identified need for development.	No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan. This demonstrates that reasonable alternatives have been explored for meeting identified needs for development as required by NPPF para. 137. For further information, the approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	Save Royton's Greenbelt Community Group D W and J Tandy Friends of Carrington Moss
JPH1_JPH1.168	The housing demand figures are over-estimates and any real housing need could be developed on brownfield sites.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper[06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].	Bernie Burns David Bentley
JPH1_JPH1.169	There are no exceptional circumstances to justify Green Belt release. All proposed site allocations within the Green Belt	No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary	See Appendix

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	<p>should be removed, and additional land made available within the main urban areas and on previously developed land.</p> <p>The policy appears to indicate the need to deliver 164,880 new dwellings over the plan period. On the basis of that figure, we do not believe that there is a justifiable case to be made for the release of Green Belt land (i.e. there are no exceptional circumstances) to meet housing needs over the plan period, particularly in light of para 141 of the NPPF and when assessing the reasonable alternatives.</p> <p>Table 7.1 / para 7.12 make it clear that there is sufficient existing supply to meet identified housing needs. The level of existing supply does not justify the proposed release of Green Belt to meet needs, there are no exceptional circumstances.</p>	<p>[07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.</p> <p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation.</p> <p>As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>	
JPH1_JPH1.170	<p>Manchester, Salford, Bolton and Wigan all have sufficient existing land supplies for the duration of the plan, while the remaining districts have sufficient supplies up to 2030 at the earliest. The land supply shortfall 10 years down the line is not enough to amount to the exceptional circumstances required to alter Green Belt boundaries.</p>	<p>No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.</p> <p>As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation.</p> <p>As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>	Save Royton's Greenbelt Community Group
JPH1_JPH1.171	<p>Green Belt release in Rochdale is not justified as there is sufficient land available to meet the LHN without GB release.</p>	<p>No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances</p>	Gordon Tilstone Ian Hubbard

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		<p>for seeking the proposed release of Green Belt to bring forward the allocations in the plan.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p>	
JPH1_JPH1.172	The quantum of land shortfall in itself does not automatically constitute an exceptional circumstance for altering the Green Belt boundaries, but rather the scale and urgency of the shortfall must be sufficiently acute to be considered as such.	No changes necessary. The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations in the plan.	Save Royton's Greenbelt Community Group
JPH1_JPH1.173	The Green Belt sites are being delivered to serve a housing buffer	No changes necessary. As set out in The Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] Appendix 1 it is widely recognised that a buffer on the housing supply is needed of at least 10% and is essential to meet the proposed phasing and to enable sufficient flexibility as required by Paragraph 73 of the NPPF. The buffer in the PfE 2021 is considered reasonable based on the wider evidence supporting the plan. The release of Green Belt sites serves a wider purpose, including contributing towards delivering the spatial strategy and the provision of new sustainable communities.	Save Greater Manchester's Green Belt (SGMGB) Jane Lester The Friends of Bury Folk Stephen Cluer Friends of Carrington Moss
JPH1_JPH1.174	Table 7.2 sets out a potential programme of housing delivery, however any of the allocated sites could be brought forward for development at any time, and those easier to develop sites will come forward ahead of previously developed sites. Relying on	No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach, as Local Authorities are required to be able to provide a 5 year supply of housing sites which are available and deliverable. We	Save Greater Manchester's Green Belt (SGMGB) Jane Lester

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	<p>future local plan reviews to correct over or under provision does not address the fundamental concerns on the levels and location of delivery and the concerns of local communities.</p>	<p>are however adopting a 'brownfield preference' policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.</p> <p>The monitoring process set out in Policy JP-H1 and Chapter 12 of the Plan is considered appropriate for a strategic plan of this nature. More detailed monitoring will be incorporated as appropriate within district local plans.</p>	<p>The Friends of Bury Folk Stephen Cluer</p>
<p>JPH1_JPH1.175</p>	<p>Green Belt release on the edge of Bury will degrade the town's landscape, it will blur the urban rural edge and lead to chaotic planning and wildlife destruction. Developers will go for easier to develop and more profitable Green Belt sites and the ability to direct development to priority areas and bring forward brownfield will be lost.</p>	<p>No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach, as Local Authorities are required to be able to provide a 5 year supply of housing sites which are available and deliverable. We are however adopting a 'brownfield preference' policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.</p> <p>As set out in Policy JP-H1 each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan.</p> <p>The plan includes a range of measures to make provision for wildlife within the Site Allocations policies themselves as well as within plan wide policies such as the Greener Places chapter of the plan.</p>	<p>David Bentley</p>

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JPH1_JPH1.176	<p>Green Belt and open land should only be considered for release if it is clear it will not cause demonstrable harm to the Green Belt or to valued open land and if the LA cannot satisfy its 5 year housing land supply.</p> <p>Suggest that no Green Belt should be released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5 year land supply and allow a brownfield first policy to be pursued. The alternative would be to avoid allocation of sites in PfE and leave this task to individual local plans.</p>	<p>No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach, as Local Authorities are required to be able to provide a 5 year supply of housing sites which are available and deliverable. We are however adopting a 'brownfield preference' policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.</p> <p>The monitoring process set out in Policy JP-H1 and Chapter 12 of the Plan is considered appropriate for a strategic plan of this nature. More detailed monitoring will be incorporated as appropriate within district local plans.</p>	<p>Gillian Boyle Janine Lawford Jane Lester The Friends of Bury Folk Woodford Neighbourhood Forum Mark H Burton</p>
JPH1_JPH1.177	<p>All Green Belt allocations should be removed until a comprehensive review of land supply has been undertaken. These allocations can then be considered in district Local Plans.</p>	<p>No changes necessary. As set out in the Housing Topic Paper [06.01.03] Appendix A, a comprehensive review of land supply has been undertaken by the districts.</p>	<p>Friends of Carrington Moss</p>
JPH1_JPH1.178	<p>The Government should adopt a brownfield first development strategy, so reducing demand on Green Belt. PfE has been hampered by national planning policy and has not been able to demand that all the brownfield sites that are developed first.</p>	<p>No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach and the PfE districts must prepare plans such as PfE in accordance with NPPF and NPPG.</p>	<p>Debbie Abrahams</p>
JPH1_JPH1.179	<p>All brownfield sites should be developed before any green spaces are used, for example reuse empty properties, former retail areas (inc. their car parks), office sites, and former mills. There should be a review of the impact of the pandemic on behaviours and general development needs so that office space and empty shops can be reused for housing. There is insufficient focus on previously developed land so swathes of fields, wildlife areas and Green Belt land are proposed for development and insufficient confidence in the accuracy of the</p>	<p>No changes necessary. As stated in Places for Everyone para. 1.43-1.44, national planning policy does not support an explicit 'brownfield first' approach. We are however adopting a 'brownfield preference' policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.</p> <p>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</p>	<p>See Appendix.</p>

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	<p>predictions of housing requirements in the current uncertain economic climate to justify Green Belt loss.</p>	<p>urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>Furthermore, 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 changes are considered necessary.</p>	
JPH1_JPH1.180	<p>The Covid-19 pandemic has caused significant changes to housing demand in terms of location and size as a direct result in the shift towards home working. This shift is considered to be a long-term change, resulting in higher demand for larger homes with outside space and access to green space in more rural areas. It is therefore considered that the housing strategy no longer remains appropriate.</p>	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>Notwithstanding this, in accordance with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Alongside the spatial strategy, the Plan also provides an appropriate policy framework to secure a range of housing type, size, design and density. Therefore, it is considered that the strategy is appropriate and Places for Everyone identifies sufficient land to meet housing needs over the plan period.</p>	Harworth Group Plc
JPH1_JPH1.181	<p>In Bury the vast majority of new housing is to be built on protected Green Belt land. This is neither sound nor legally compliant.</p>	<p>No changes necessary. A key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. However, as set out in Places for Everyone Table 7.1, Bury has a limited supply of brownfield sites and therefore needs to meet a</p>	C Smith Jill Neal

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		considerable proportion of its housing target through Green Belt site allocations. The details of the exceptional circumstances' case for these allocations can be found in the relevant allocation topic papers.	
JPH1_JPH1.182	Bury Council have informed the public that they will have a brownfield first policy. The Leader has clarified that this is for anything the council build themselves as they have no control over the actions of private developers. In reality they do as they could limit the release of Green Belt sites in accordance with National Policy para 134 part e.	No changes necessary. Delivery of brownfield sites is a key priority for the plan as a whole and for Bury Council individually and a range of actions are underway to seek to accelerate brownfield housing delivery. However, Bury has a limited supply of brownfield sites and therefore needs to meet a considerable proportion of its housing target through Green Belt site allocations. The details of the exceptional circumstances' case for these allocations can be found in the relevant allocation topic papers.	Gary West Alan Bayfield David McLaugh Jane Lester The Friends of Bury Folk Stephen Cluer Philip Smith-Lawrence Juliet Eastham David Brownlow Daniel Lawson
JPH1_JPH1.183	Insufficient sites have been allocated within Bury to meet demand (LHN of 596pa) and further allocations are needed to meet needs in the short term as well as promote strategic land releases in the medium to long term.	No changes necessary. A key objective of the plan is to meet our collective Local Housing Need. By working together we have been able to direct development to the most sustainable areas – primarily the city and town centres – and enable most efficient use of our brownfield land supply. Bury's housing target is considered to be in line with the approach to growth and spatial distribution set out in the Growth and Spatial Options Paper [02.01.10]	Miller Homes
JPH1_JPH1.184	The proposed allocations are not sufficient to ensure that the housing needs will be met (family housing need). There is a need to remove additional suburban and Green Belt sites from the Green Belt to give a more diverse, flexible and deliverable supply of land that can deliver the required social infrastructure and dwellings within the plan period.	As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN of the 9 districts. It is considered that this represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN. Therefore, it is considered that the strategy is appropriate and Places for Everyone identifies sufficient land to meet the joint plan area's housing need over the plan period, as identified by the Greater Manchester Strategic Housing Market Assessment [06.01.02] .	See Appendix

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		In accordance with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Alongside the spatial strategy, the Plan also provides an appropriate policy framework to secure a range of housing type, size, design and density, supported by necessary infrastructure. In particular reference should be made to Policies JP-H3, JP-G6, JP-P1, JP- D2 and relevant individual allocation policies. The Plan needs to be read as a whole, therefore no change is considered necessary.	
JPH1_JPH1.185	A full review of Green Belt is needed as part of PfE. This is likely to identify many small sites on the urban fringes that already have infrastructure in place and can come forward at an early date, ahead of the larger allocations which may require Government investment and may exclude many local and smaller regional developers. Local Plans may shy away from Green Belt release of smaller sites.	No changes necessary. It is considered that the evidence underpinning the Plan in relation to the Green Belt is sufficiently robust and proportionate to support the policies the Plan. This evidence is summarised in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] .	See Appendix
JPH1_JPH1.186	It should be clarified whether further allocations will be made through local plans / it should be made explicitly clear that allocations can be made through Local Plans where required due to shortfalls in supply (including outside the urban area).	Paragraph 11.2 makes it clear that district local plans will allocate sites from within the existing land supply and paragraph 11.5 states that the role of the PfE Plan is identify the additional sites, outside the urban area which combined with the existing land supply are required to enable us to meet our overall objectives. Therefore no changes are considered necessary.	Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Miller Homes Barratt Manchester Limited EON Plant Ltd Hollins Strategic Land
Buffer			
JPH1_JPH1.187	In light of the deliverability and viability concerns, a buffer of at least 15- 20% should be provided for, and more flexibility than a 5% buffer should be built into the housing land supply in Manchester	No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. Although Manchester City has a 5% buffer over the life time of the Plan, as with others it has a buffer of at least a 35% in the early years of the plan. This	See Appendix

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	Sufficient flexibility needs to be provided in the supply to ensure that there is a realistic prospect of the housing requirements being met, taking market vulnerabilities into account. The target should be increased to 200,000 homes, with an increase in Green Belt release if there is a wish to retain a 16% buffer.	approach, together with regular reviews of the land supply and the Plan, will enable the overall spatial strategy to be met, whilst reflecting the challenges in terms of the uplift in LHN and represents a reasonable degree of flexibility in the housing land supply to ensure that we can meet our LHN. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need of 164,880 over the plan period calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. The identification of a land supply buffer demonstrates that the target is deliverable, it should not follow that the target is increased to meet the buffer.	
JPH1_JPH1.188	The viability evidence demonstrates that 31% of the overall supply (c. 59,100 homes) is not currently viable, even assuming no affordable housing. This is over double the supply buffer (c. 25,800 homes).	No changes necessary. It is acknowledged that there are viability challenges with some of the land supply and this is set out in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] . 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.	Peel L&P Investments (North) Ltd
JPH1_JPH1.189	There is no acknowledgement of where the expectation for a buffer on housing supply of at least 10% is covered in law nor who widely recognises it, as referenced within Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary, clause 1.21. It takes no account of the fact that the ONS baseline figure has already had an uplift approaching 20% for affordability and the cities and urban centres uplift, from 131,632 to 168,880. Even taking that into	No changes necessary. Consideration of the buffer is provided in the Housing Topic Paper [06.01.03] Section 6. An overall buffer of 16% across the plan area is considered reasonable, and is not a sign that excess land has been identified, but is in fact necessary to demonstrate that the targets can be met, particularly in light of the viability challenges presented in the Strategic Viability report. The affordability uplift and cities and urban centres uplift are incorporated into the Local Housing Need calculation and are not a substitute for a buffer on the land supply.	Lisa Powell Robyn Powell Sam Powell

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	account, GM still retains a buffer approaching 10% without any additional site allocations.		
JPH1_JPH1.190	Concern in relation to the identified housing need and the fact that the Plan appears to be seeking to over-provide for housing land.	No changes necessary. The Growth and Spatial Options Paper [02.01.10] considers the implications of alternative growth options and concludes that the local housing need of 164,880 over the plan period calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. An overall buffer of 16% across the plan area is considered reasonable, and is not a sign that excess land has been identified, but is in fact necessary to demonstrate that the targets can be met, particularly in light of the viability challenges presented in the Strategic Viability report.	See Appendix
JPH1_JPH1.191	The plan should be modified to reduce the overall level of housing land required to meet the needs over the plan period.	No changes necessary. As shown in Housing Topic Paper [06.01.03] Table 6.3 a total estimated land supply of 190,752 units has been identified, which equates to a 16% buffer over the total LHN. An overall buffer of 16% across the plan area is considered reasonable, and is not a sign that excess land has been identified, but is in fact necessary to demonstrate that the targets can be met, particularly in light of the viability challenges presented in the Strategic Viability report.	Save Greater Manchester's Green Belt (SGMGB) SGMGB - Oldham Groups SGMGB - Bury Groups SGMGB - Rochdale Groups SGMGB - Save Apethorn & Bowlacre Jane Lester The Friends of Bury Folk Stephen Cluer
Infrastructure			

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JPH1_JPH1.192	Additional large-scale urban extensions should be identified to allow for development to be masterplanned to ensure that the appropriate social and physical infrastructure can be delivered.	No changes necessary. It is considered that the strategy is appropriate and Places for Everyone identifies sufficient land to meet Greater Manchester's housing need over the plan period, including an appropriate buffer as identified by Document 06.01.02 Greater Manchester Strategic Housing Market Assessment . Please see the Housing Topic Paper [06.01.03] for full details of the Housing Land Supply.	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.193	For many of the PfE allocations, the infrastructure required to support these means that they may only produce large numbers of residential units in the second half of the plan period. This is an important consideration when identifying the assumptions which will underpin the assessments included in the required transport evidence.	No changes necessary. The phasing trajectory is considered realistic and justified by evidence. It will result in housing being delivered to meet the identified needs over the life of the plan. It takes account of masterplanning and infrastructure required to support the development of some sites. Such assumptions have been incorporated as appropriate into supporting evidence such as the transport evidence.	National Highways
JPH1_JPH1.194	Detrimental impact on existing householders.	No changes necessary. Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future, is a key part of the plan. The Plan as a whole provides an appropriate framework to deliver this ambition, with Policy JP-P1 playing a pivotal role.	Peter Stratton Jo Salway Caroline O'Donnell Howard Sykes Peter Thompson Ian Hubbard
JPH1_JPH1.195	The plan fails to identify sufficient infrastructure to accommodate the growth planned within the urban area. Securing sites to deliver social and physical infrastructure, as well as amenity space in the urban area will be extremely difficult and has not been appropriately considered. Relying on s106 contributions for delivery is unreliable, particularly given viability issues. Existing towns and villages are already overcrowded with housing, existing infrastructure and services are already stretched. New provision is required before / instead of any housing.	A number of policies in the Plan provide a sufficient policy framework to address infrastructure provision, such as Policies, JP-G6, JP-P1 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary. The development planned through the Places for Everyone plan is not the only means of delivering infrastructure to support existing communities. As referenced in para. 12.8 of Places for Everyone an Infrastructure Framework for Greater Manchester has been produced, which sets out the key issues and priorities which need to be addressed.	See Appendix

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		The Greater Manchester Strategic Infrastructure Board will consider and respond to the issues and challenges raised by the Infrastructure Framework. We are working with the Government through the Local Industrial Strategy to ensure that the right powers and funding are in place to ensure the timely delivery of the right infrastructure in the right place at the right time.	
JPH1_JPH1.196	The impact of the planned level of development on the infrastructure including health services, schools, traffic congestion, sewers does not seem to have been assessed or addressed and will have an adverse impact on health and wellbeing of communities. Failure to provide social infrastructure in a planned and proactive fashion could result in the creation of many unsustainable and substandard communities, and result in unnecessary journeys far from where people live.	The impact of the Allocations upon infrastructure has been assessed for the allocations and the necessary mitigation/infrastructure requirements have been included in the allocation policies. Please refer to the relevant topic papers and policies for site specific details. Notwithstanding this, a number of policies in the Plan provide a sufficient policy framework to address infrastructure provision, such as Policies, JP-G6, JP-P1 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Specifically, Policy JP-P1 Sustainable Places will require development, where appropriate, to respect and acknowledge the character and identify of the locality in terms of design, siting, size, scale. The Plan needs to be read as a whole, therefore no change is considered necessary.	See Appendix
JPH1_JPH1.197	Improve infrastructure and services to support increasing population on brownfield sites as currently there is a lack of Section 106 funds and health care infrastructure in the city centre to support the amount of tower blocks going up.	A number of policies in the Plan provide a sufficient policy framework to address infrastructure provision, including for development which will come forward within the urban area. These include Policies such as 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.	Andrew Richards Anthony Tattersall Howard Sykes Louise Bolotin
JPH1_JPH1.198	Insufficient detail on how the substantial infrastructure that is needed will be financed.	No change is considered necessary. The policies within Chapter 12 identify an appropriate strategy and mechanisms to secure the necessary infrastructure required to support the growth proposed in the Plan. Additionally, the relevant allocation policies are supported by a proportionate evidence base, detailing the infrastructure required to	See Appendix.

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		support the development. Further details of which can be found in the relevant allocation topic papers.	
JPH1_JPH1.199	It is vital to have coordinated plans that make best use of land and in particular brownfield sites close to public transport corridors - supported by walking and cycling routes away from congested road corridors and their high pollution levels.	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. Policies within the Connected Places Chapter, particularly JP-C1, JP-C4 and JP-C5 support the delivery of a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes, and locating and designing development to deliver a significant increase in the proportion of trips that can be made by walking, cycling and public transport. The Plan needs to be read as a whole, therefore no change is considered necessary.	Roy Chapman
JPH1_JPH1.200	Public transport needs to become frequent, cheap and 24hr to give access to jobs and reduce pollution.	No changes necessary. Out of scope for a development plan document, however, further information on the strategic approach to public transport is set out in the Greater Manchester Transport Strategy 2040 (updated January 2021) [09.01.01] and Our Five Year Transport Delivery Plan [09.01.02] .	John Smith
JPH1_JPH1.201	Concern about congestion charges because of increasing population leading to congestion and problems for emergency vehicles.	No changes necessary. Out of scope for a development plan document, however, further information on the strategic approach to reduce congestion is set out in the Greater Manchester Transport Strategy 2040 (updated January 2021) [09.01.01] and Our Five Year Transport Delivery Plan [09.01.02] . PfE policies in Chapters 5 and 10 reflect this evidence base appropriately for a development plan document.	Joanne Koffman
JPH1_JPH1.202	The existing hospital in Oldham cannot cope with the existing population. A new hospital will need to be built.	No change is considered necessary. Policy JP-P6 provides an appropriate strategy to secure improvements in health facilities in response to changing needs and demands of both existing and new residents. This approach is considered to be consistent with NPPF. The policy wording for the strategic allocations in Oldham (JPA12 to JPA18) all require development to provide for appropriate health and	Geoffrey Ralphs

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		community facilities, recognising that it is important to ensure that any development proposed does not place undue pressure on existing infrastructure and that any development takes account of the increased demand it may place on existing provision.	
JPH1_JPH1.203	Green spaces should be retained to support mental and physical health.	No changes necessary. Objective 8 of the plan seeks to improve the quality of our natural environment and access to green spaces. Policy JP-Strat 13 sets out our approach to Strategic Green Infrastructure and Policy JP-P7 sets out our approach to sport and recreation. Further guidance and protection is also contained within district local plans.	Tracy Doyle Collette Gammon Jo Salway Caroline O'Donnell CPRE
JPH1_JPH1.204	How can plans improve natural environments and access to green space if green space is being destroyed in the first place. Open spaces are well used by local communities and should be increased around existing communities.	No changes necessary. This comment is not relevant to Policy JP-H1. Please refer to Policy JP-Strat 13 supports the protection and enhancement of strategic green infrastructure assets.	Andrew Wales Samantha Dugmore Paul Roebuck Julie Riley Anthony Tattersall Kevin Lawton Caroline O'Donnell
JPH1_JPH1.205	Concerned about the sustainability of building on green, natural flood land and over the top of previous mining sites, and the increase in CO2 resulting from new development.	No changes necessary. The plan has been subject to an Integrated Assessment (IA) which assesses its overall sustainability by considering it against a number of economic, social and environmental objectives, see IA documentation here: IA Scoping Report [02.01.01] and IA Main Report (2020) [02.01.02] .	Janet Millett Samantha Dugmore Bernie Burns Vicky Harper Kevin Lawton
JPH1_JPH1.206	GM needs to introduce a codified zero-carbon buildings design standard, and bring forward the 2028 date for achieving zero carbon. New homes do not come with new renewable energy, electric boilers and carbon neutral building practices because it eats into developers profits. Would welcome new homes if the profit margins were less because the developer had invested in the build for the homeowner not the shareholders dividend.	No changes necessary. Our approach to carbon and energy is set out in Policy JP-S2 and includes an expectation that new development will be net zero carbon from 2028 with an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations. The provision of renewable and low carbon energy schemes is supported by Policy JP-S3.	Linus Mortlock Friends of the Earth
JPH1_JPH1.207	Should seek the removal of aged homes which are inefficient and do not address green / carbon policies.	No changes necessary. Policy JP-S2 promotes the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling.	Paul Roebuck

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JPH1_JPH1.208	There needs to be stringent regulation to require all residential development to meet high environmental standards, on site retained green space and wildlife friendly features.	No changes necessary. This comment is not directly relevant to Policy JP-H1. Our approach to the environment and wildlife is set out in Policy JP-G9 which expects development to follow the mitigation hierarchy of: i. Avoiding harm to biodiversity, particularly where it is irreplaceable, and including consideration of alternative sites where appropriate, then ii. Mitigating (within the local area) any harm to biodiversity, then iii. Compensating (within the local area) for any remaining harm to biodiversity. Development will also be expected to achieve a net gain in biodiversity.	Janet Aunins
JPH1_JPH1.209	Welcome the intention that a substantial element of the proposed new housing will take place on brownfield land, however there are examples of where this conflicts with other policies (particularly conserving and enhancing the natural environment).	Policy JP-G9 expects development to follow the mitigation hierarchy of: i. Avoiding harm to biodiversity, particularly where it is irreplaceable, and including consideration of alternative sites where appropriate, then ii. Mitigating (within the local area) any harm to biodiversity, then iii. Compensating (within the local area) for any remaining harm to biodiversity. Development will also be expected to achieve a net gain in biodiversity. The Plan needs to be read as a whole, therefore no change is considered necessary.	The Wildlife Trusts
JPH1_JPH1.210	No / insufficient consideration has been given to the detrimental impact on wildlife and biodiversity, including Great Crested Newts. Wildlife needs a home too.	No change is considered necessary. Policy JP-G9 expects development to follow the mitigation hierarchy and provides an appropriate strategy to achieve a biodiversity net gain and is considered to be consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	See Appendix
JPH1_JPH1.211	In light of the current climate and nature emergencies there should be no felling or destruction of existing trees, and maximum emphasis on retaining existing green spaces and creating new ones.	No change is considered necessary. Policy JP-G7 provides an appropriate strategy to emphasise the importance of trees and woodland and is considered to be consistent with the NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	Janet Aunins
JPH1_JPH1.212	Insufficient consideration has been given to climate change.	No changes necessary. As explained in Places for Everyone para. 5.7 climate change is a key theme running throughout the plan, delivering a combination of actions which will address climate change. In particular	Friends of Carrington Moss Ian Hubbard

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		Policies JP-S2, JP-S3, JP-S4, JP-S 5 'Flood Risk and JP-S7. Additionally this was a matter given specific consideration through the Integrated Assessment, for further details please see the Scoping Report [02.01.01] .	
JPH1_JPH1.213	All new housing developments should include an accessible integrated sustainable transport scheme and secure cycle storage.	No changes necessary. Policy JP-C7 sets out transport requirements of new development, including specifically addressing cycle parking at policy point 9. The plan should be read as a whole, therefore no changes are necessary.	Trans Pennine Trail
House types			
JPH1_JPH1.214	There is no quantitative assessment of the future need for care facilities and student accommodation.	No changes necessary. The Greater Manchester Strategic Housing Assessment [06.01.02] Chapter 6 provides information on the future need for care facilities and student accommodation. As stated in Policy JP-H3 housing provision to accommodate students will be addressed through district local plans.	Hollins Strategic Land HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Wainhomes (NW) Ltd
JPH1_JPH1.215	The Plan is silent on Gypsies, Travellers and Travelling Showpeople. It should be clarified that PfE is not covering this matter and it will be for the 10 local authorities to pick this up at a district level and review the GMGTAA.	No changes necessary. As stated in Policy JP-H3 housing provision to accommodate specific groups, such as travelling people, will be addressed through district local plans.	Chorley Council
JPH1_JPH1.216	The new homes proposed will not be affordable and there is a lack of affordable housing provision	No change is considered necessary. Policy JP-H2 provides an appropriate strategy for the affordability of new housing and is considered to be consistent with NPPF	See Appendix
JPH1_JPH1.217	The plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery to each authority Local Plan. This may result in an inconsistent and incoherent approach, and the danger that local authorities fail to set out affordable housing policies, and as such the plan could be deemed to be unsound. A standard affordable housing requirement should be set across the plan area.	Policy JP-H2 sets out our approach to affordability of new housing, with detailed policy requirements to be set at the local level for each district. We consider it is appropriate and consistent with NPPF for the detailed policy requirements for affordable housing to be set at the local level, therefore no change is necessary.	See Appendix

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JPH1_JPH1.218	Affordable housing providers are finding themselves increasingly competing for brownfield sites with private developers. There needs to be a commitment to providing land for affordable development, otherwise there is the significant risk that the target will not be met, particularly the objective to build 60% of the target as Affordable or Social Rent.	No changes necessary. Places for Everyone identifies sufficient land to meet our local housing need and therefore, no change is necessary. Policy JP-H2 provides an appropriate approach to affordability of new housing and is considered to be consistent with NPPF. We will support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), with locally appropriate requirements being set by each local authority. We will continue to work with Government to maximise the amount of public funding being directed towards the provision of new affordable housing.	Greater Manchester Housing Providers
JPH1_JPH1.219	Support the delivery of 50,000 affordable homes and trust a suitable local definition can be adopted that meets the disparate financial situations and requirements of people in housing need.	Support noted.	Friends of the Earth
JPH1_JPH1.220	It is unclear whether the 50,000 affordable homes is part of or in addition to the total housing target, or how these affordable homes will be distributed to people on affordable housing waiting lists.	No changes necessary. The 9 districts share of the 50,000 additional affordable homes to be provided across Greater Manchester forms part of the overall PfE housing target. The process of allocating affordable properties will be determined locally dependent upon the delivery mechanism.	Peter Thompson
JPH1_JPH1.221	City centre apartments are being built aimed at the quite affluent but could have provided social housing for the lower income people which keep the city's economy running. Who is all this development for, and how will it gel with existing communities?	No changes necessary. As set out in Chapter 9, the Plan promotes inclusivity and is designed to improve the lives of all residents. Increasing the supply of affordable homes is an essential component of the overall strategy, but it is important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations. Policy JP-H2 sets out our approach to affordability of new housing JP-H3 sets out our approach to securing a range of dwelling types and JP-P1 (amongst other policies) provides a suitable policy framework to ensure that new development is fully integrated into places that already have strong identities.	Peter Thompson
JPH1_JPH1.222	The misguided 'Right to Buy' policy means that too many Council houses have been sold too cheaply and not replaced.	No changes necessary. The Right to Buy Scheme is a national Government policy and is therefore out of scope of this Plan.	Roy Chapman

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	The Right to Buy policy must be scrapped, or at least reduced to max. 15% discount, with Councils obtaining money in excess of the cost of building replacements.		
JPH1_JPH1.223	Genuinely affordable housing should be made available through investing in town centres, brownfield sites and unlocking empty properties.	No change is considered necessary. Policy JP-H2 provides an appropriate strategy for the delivery of affordable housing and is considered to be consistent with NPPF.	Janine Ainley
JPH1_JPH1.224	The housing strategy and the preference for brownfield sites and city centre apartments will fail to address the lack of diversity within the existing housing stock and is likely to reduce the delivery of affordable housing.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the targets are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The provision of affordable housing in city centre apartments is an issue for local plans.	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.225	Concerned that developers will want to build 4 and 5 bed properties, rather than the 2 and 3 bed houses that we need, and the policies will not be policed. Why don't the Council build the homes we need themselves?	No change is considered necessary. Policy JP-H3 provides an appropriate strategy for the delivery of a suitable mix of dwelling types and sizes, and is considered to be consistent with NPPF Local authority direct delivery is limited by Government restrictions and lack of funding, with private developers and registered providers having a key role to play in delivering the homes that are needed.	Laura Ettrick

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH1_JPH1.226	Houses have been built with the aim of maximising Council revenue and not looking at the social needs of the community - predominantly larger homes occupying green spaces.	No changes necessary. The Plan proposes a level of housing required to meet the needs of the community. Policy JP-H3 sets out the approach to type, size and design of new housing. Development across the plan area will incorporate a range of dwelling types and sizes reflecting local circumstances.	Anthony Dann
JPH1_JPH1.227	Consideration should be given to older baby boomer generation vacating larger under occupied homes, which should be encouraged.	No changes necessary. The Plan recognises this at para. 7.32 referring to the need for better options for those who would like to move. In turn, and Policy JP-H3 requires new dwellings to be built to accessible and adaptable standards in addition to the provision of specialist housing for older people where appropriate.	Peter Walters
JPH1_JPH1.228	Older households cannot necessarily be relied upon to free up larger dwellings to the degree needed to meet the needs of future families.	No changes necessary. The PfE does not rely upon older households as a source of housing land.	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.229	Much of the population and household growth will come from the over 75s and the housing policies in the plan need to reflect the specific housing needs of this group.	Please see response to row JPH1_JPH1.228	Gillian Boyle
JPH1_JPH1.230	There is a lack of vision / aesthetics and tall buildings policy / tall buildings zones in the city centre. City centre communities are being worsened as a result of the level of building and lack of facilities.	No change considered necessary. Consistent with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. A number of policies in the Plan provide a sufficient policy framework to address infrastructure provision, such as Policies, JP-G6, JP-P1 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Louise Bolotin Roy Chapman
JPH1_JPH1.231	Stop building flats	No change considered necessary. Consistent with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth area and in other urban areas.	John Smith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH1_JPH1.232	With a significant proportion of supply being directed towards Salford and Manchester, the balance of house types is disproportionately skewed towards city centre apartments rather than family housing, and not aligned with needs arising within the PfE area. The trend for overcrowding and small homes will continue.	No change considered necessary. Consistent with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) As made clear in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Furthermore, please also refer to paragraph 7.31 of the plan which refers to the scope to increase the number of families living in apartments.	See Appendix.
JPH1_JPH1.233	The proposed split of houses and apartments is a poor match with the demand projected from the 2018 household projections, analysis of which suggests 60% of demand will be for larger family properties (3+ bedrooms) and the GM Housing Survey 2017 which suggests just 8% want to live in an apartment in the City Centre. The mix of residential land supply is of particular concern in Manchester, Salford and Trafford.	No changes necessary. This comment is not relevant to Policy JP-H1. Please refer to Policy JP-H3 which makes it clear that the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Story Homes Limited Peel L&P Investments (North) Ltd Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.234	There is an overreliance on Manchester / Salford apartments and we would question whether the market can sustain this level of development over the plan period (an average of 4,725 dwellings from this source per year) or whether it will deliver any affordable housing. The city centre apartment market is sensitive to economic conditions.	No change considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . 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	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03]. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit.</p>	
JPH1_JPH1.235	<p>A step change in apartment delivery would need to be achieved and sustained over the 17 year plan period in order to meet the housing target. There is no credible evidence to identify how this will be achieved.</p>	<p>No change considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. 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]. 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. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03].</p>	Story Homes Limited
JPH1_JPH1.236	<p>The supply of sites should respond to detailed evidence of the size, type and tenure of homes required in each local authority.</p>	<p>No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. The precise mix of dwelling types and sizes will be determined through district local plans,</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	
JPH1_JPH1.237	A sustainable approach to housing is one that would seek the development of mixed tenure, inclusive communities which cater for households of different sizes, ages and backgrounds - question whether the focus on apartments in some areas is sustainable.	No change considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . 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] . The plan has been subject to an Integrated Assessment (IA) which assesses its overall sustainability by considering it against a number of economic, social and environmental objectives, see IA documentation here: IA Scoping Report [02.01.01] and IA Main Report (2020) [02.01.02] .	Friends of the Earth
JPH1_JPH1.238	The pandemic has led to a shift in demand toward properties which offer a garden and space for a home office. There is a false presumption that smaller households will primarily seek to reside in apartments within the main urban areas.	No change considered necessary. Consistent with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Additionally, 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	Story Homes Limited Peel L&P Investments (North) Ltd Hollins Strategic Land Bellway Homes Ltd Home Builders Federation Housebuilding Consortium

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	Taylor Wimpey
JPH1_JPH1.239	The misalignment of need with supply will exacerbate affordability issues, most notably in Trafford.	No changes necessary. The housing targets in the Plan (including those for Trafford) are in line with the outcomes of the Growth and Spatial Options Paper [02.01.10] .	See Appendix.
JPH1_JPH1.240	The lack of available suburban housing sites will drive up house prices widening the gap between inner area and suburban housing prices.	No changes necessary. The housing targets in the Plan are in line with the outcomes of the Growth and Spatial Options Paper [02.01.10] .	See Appendix.
JPH1_JPH1.241	Good quality and design can only be achieved if the land supply includes an appropriate proportion of sites that allow for lifetime housing and the potential for adaptation over the plan period.	Policy JP-H3 requires all new dwellings to be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations, unless specific site conditions make this impracticable.	Metacre Ltd
JPH1_JPH1.242	New calculations of housing need need to take account of the type of homes needed and how they will be met.	As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology. Therefore no change is considered necessary.	Elisabeth Berry
JPH1_JPH1.243	There is a heavy reliance on apartments in Bolton, with no evidence that this is aligned to demand or is deliverable or consistent with the aim of increasing the attractiveness of the north.	No change considered necessary. Consistent with NPPF, the Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the urban area..	Persimmon Homes North West
JPH1_JPH1.244	There is scope to increase the target for Bolton, consistent with the strategy to increase the attractiveness of the north by releasing additional land.	No changes necessary. The targets in the plan are in line with the approach to growth and spatial distribution which is set out in the Growth and Spatial Options Paper [02.01.10]	Persimmon Homes North West
JPH1_JPH1.245	Housing land supply for Trafford is predominantly in the urban areas in the north of the Borough, too reliant on apartment schemes, and will fail to deliver sufficient affordable homes and family homes.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable.	Hollins Strategic Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . Chapter 4 (4.1 - 4.23) of the plan summarises the PfE Spatial Strategy which seeks to sustain the competitiveness of the Southern Areas such as Trafford. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	
JPH1_JPH1.246	Additional housing is modest in the north of Bury, with no sites in Ramsbottom. Bury has an ageing population and is only meeting 76% of LHN. Additional sites could be developed.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . Chapter 4 (4.1 - 4.23) of the plan summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas such as Bury. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	AA Homes & Housing Ltd
JPH1_JPH1.247	There is a need for a significant boost in larger family-sized housing to meet needs in Oldham, which has an ageing population and out flows of working age people, undermining the Borough's economic aspirations.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . Chapter 4 (4.1 - 4.23) of the plan summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas such as Oldham. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The policy wording for the strategic allocations in Oldham (JPA12 to JPA18) all require development to provide a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing. This will be in line with local planning policy requirements and will be informed by Oldham Council's Housing Strategy and Local Housing Needs Assessment.	Chasten Holdings Ltd Joe Jaskolka

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH1_JPH1.248	There is a particular need for sites that can deliver within the early part of the plan period in the Saddleworth area due to affordability issues.	No change considered necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. Recent delivery rates demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] . Chapter 4 (4.1 - 4.23) of the plan summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas such as Oldham. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	Chasten Holdings Ltd
Safeguarded Land			
JPH1_JPH1.249	The post-2037 supply identified within the PfE is insufficient to meet the longer-term development needs well beyond the plan period. Further Green Belt land will need to be released at the end of the plan period to meet future needs given that brownfield sources of supply are a finite resource. PfE fails to designate sufficient safeguarded land to meet future needs or in case of under provision. The identification of a number of smaller sites as safeguarded land in each authority would offer the potential to quickly address shortfalls in the supply of units through a Local Plan Review.	A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning that the Green Belt boundary will endure beyond the plan period. Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the identified housing needs, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Notwithstanding this, Policy JP-G11 has been included in the plan in relation to safeguarded land. Therefore, together with the monitoring framework within the plan, it is considered that Policy JP-H1 and JP-G11 provide an appropriate policy framework to ensure long-term land supply, consistent with NPPF and no changes are necessary.	See Appendix.
JPH1_JPH1.250	As a minimum at least 10 years worth of land needs to be identified in each of the 9 areas in addition to the flexibility buffer already inbuilt. The safeguarded land needs to be in addition to the large allocations which will deliver units beyond the plan period.	A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning that the Green Belt boundary will endure beyond the plan period. Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the identified housing needs, in line with the evidence base, it will also result	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Notwithstanding this, Policy JP-G11 has been included in the plan in relation to safeguarded land. Therefore, together with the monitoring framework within the plan, it is considered that Policy JP-H1 and JP-G111 provide an appropriate policy framework to ensure long-term land supply and is prepared in accordance with the new element of NPPF paragraph 22. Therefore no change is considered necessary.	
JPH1_JPH1.251	Safeguarded land in Standish is suitable for more aspirational housing and should be preferred in sequential terms to release of Green Belt. These opportunities have not been fully examined.	The Wigan Strategic Housing Land Availability Assessment (SHLAA) identifies all the land that is considered to be deliverable over the lifetime of the plan. The Wigan SHLAA considers the remaining undeveloped areas of safeguarded land in Standish, but these are not currently deemed to be suitable due to their impact on highway infrastructure capacity. The Site Selection Background Paper [03.04.01] sets out the process for allocating sites outside the urban area.	Persimmon Homes North West Morris Homes (North) Ltd
Other			
JPH1_JPH1.252	Consultation issues	Comment not specifically relevant to the content of Policy H1. Matter addressed elsewhere.	See Appendix.
JPH1_JPH1.253	Legal compliance issues	Comment not specifically relevant to the content of Policy H1. Matter addressed elsewhere.	See Appendix.
JPH1_JPH1.254	Duty to Cooperate issues	Comment not specifically relevant to the content of Policy H1. Matter addressed elsewhere.	See Appendix.
JPH1_JPH1.255	Major partners for employment provision should be identified	Comment not specifically relevant to the content of Policy H1. Matter addressed elsewhere.	See Appendix.
JPH1_JPH1.256	In addition to PfE each district needs to come up with its own local plan. No details have been given about when these plans will be available.	Comment not specifically relevant to the content of Policy H1. Matter addressed elsewhere.	See Appendix.
JPH1_JPH1.257	Policy H1 is not sound / legally compliant. (No further details provided).	Policy JP-H1 and the plan as a whole are considered to be sound and legally compliant.	See Appendix.
JPH1_JPH1.258	Policy H1 is sound / legally compliant. (No further details provided).	Noted	See Appendix.

Policy JP-H 2 Affordability of New Housing

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Affordability		
JPH2_JPH2.1	The adjustment applied to local housing need to take account of affordability (an extra 1,218 homes per annum) will barely have an effect on the affordability of homes in Greater Manchester.	No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02]Chapter 3.2 Standard methodology : Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provide detailed information on the need for affordable housing in Greater Manchester. As with previous methods for assessing housing need, the methodology states that an adjustment should be made to consider market signals, specifically the affordability of housing. The effect across Greater Manchester of the application of step 2 is to increase the annual housing need figure by 15% to 10,305	Morris Homes (North) Ltd Persimmon Homes North West
JPH2_JPH2.2	Definition: Concern regarding definition of 'affordable' and who it would be affordable for, whether it will take into account local wages, affordability of student accommodation and whether it will use the Government's definition of affordable housing (as set out in national planning policy).	No changes necessary. In Policy JP-H2 Affordability of new housing, at Footnote 81, we confirm that the definition of different forms of affordable housing is given in Annex 2:Glossary (Page 64) of the NPPF. In relation to student accommodation, Policy JP-H 3 Type, Size and Design of New Housing states that provision to accommodate specific groups, such as students, will be addressed through district local plans.	See Appendix
JPH2_JPH2.3	Concern that housing will not be affordable in the first instance for the low paid, and that housing will be executive 4 and 5 bedroom homes, and that what the government deems affordable is not affordable. Developers will deliver no affordable housing on valuable Green Belt land (reference to track record of developers).	No changes necessary. Increasing the supply of affordable homes is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations. Policy JP-H2 sets out our approach to affordability of new housing, and where relevant detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE)	See Appendix
JPH2_JPH2.4	Ground rent is an additional cost that also makes affordability questionable. Ground rent should be disallowed for newbuilds	This is currently out of the scope of the Places for Everyone plan.	Linus Mortlock
JPH2_JPH2.5	The statement suggests affordable homes for all, this is unclear as the homes planned for Rochdale are described as executive, this would suggest out of reach for affordability.	No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the	Andrew Wales

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		need for affordable housing in Greater Manchester, and Table 7.15: provides a summary of Affordable Housing Needs Assessment by Greater Manchester district, including Rochdale. Increasing the supply of affordable homes is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations however ultimately, locally appropriate requirements will be set by each local authority.	
JPH2_JPH2.6	Concern that following the sale of the 'affordable' units by the first residents, the housing will no longer be affordable in future unless managed/owned by the Council.	No changes necessary. The definitions of affordable housing for home ownership set out in the NPPF state that provisions should be in place to ensure housing remains at a discount for future eligible households, and where public grant funding is provided there provisions for any receipts to be recycled for alternative affordable housing, or refunded to Government or the relevant authority specified in the funding agreement may be required.	Collette Gammond
JPH2_JPH2.7	There will be no interest in affordable housing.	No changes necessary. The Strategic Housing Market Assessment [06.01.02] at Chapter 3.2 Standard methodology : Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides further information on the need for affordable housing in Greater Manchester. Paragraph 7.23 of the PfE confirms that there are around 72,000 households on the local authority registers, with over 26,000 of these identified as being in reasonable preference for housing.	Thomas Michael Norris
JPH2_JPH2.8	The plans do not propose enough affordable housing	No changes necessary. Places for Everyone identifies sufficient land to meet Greater Manchester's housing need. Further details in relation to housing need, including affordability can be found in the Greater Manchester Strategic Housing Market Assessment . [06.01.02]	E Bowles
JPH2_JPH2.9	More detail required regarding how the PfE will ensure that developers comply with affordable housing required by the original planning applications and provide the affordable dwellings first rather than last. Concern that whilst applicants may include a number of	No changes necessary. Draft Policy JP-D2 will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through the most appropriate mechanism, including, but not	Alan Sheppard

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	smaller more affordable houses on the planning application, they will build those houses last and later in the project will cite that the profit has reduced and will then gain approval from the Council to reduce the number of affordable homes.	limited to, planning conditions, legal contracts, or CIL (although this cannot currently be used to fund affordable housing) (or any subsequently adopted planning gain regime).	
JPH2_JPH2.10	Should request 50% affordable social new housing stock on all new developments.	Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% being for social rent or affordable rent. The site allocation policies (Chapter 11) set out the affordable housing requirements for each site.	David Hawes
JPH2_JPH2.11	Draft policy JP-H2 is not fit for purpose and offers no serious requirement for the affordable housing needs of the nine boroughs to be met. This cannot be justified and will not be effective, and as such the Plan is likely to be found to be unsound.	No changes necessary. Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, and where relevant detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE)	Save Greater Manchester's Green Belt Stephen Cluer Christopher Russell
JPH2_JPH2.12	PBSA in Manchester is among the most expensive but worst quality in the country, therefore growth should be regulated by Greater Manchester Combined Authority to assure standards. A requirement for a minimum number of rooms in PBSA to be affordable to students should be added to this policy. In addition to a requirement for affordable rooms, a requirement for a nominations agreement would ensure that universities can prioritise rooms for students most in need.	The Greater Manchester Strategic Housing Market Assessment . [06.01.02] at Chapter 6.7 sets out the housing needs of Students. Policy JP-H 3 Type, Size and Design of New Housing states that provision to accommodate specific groups, such as students, will be addressed through district local plans. Furthermore, Policy JP-H2 outlines that locally appropriate affordable housing requirements are to be set by each local authority. Therefore no change to the wording of this policy is considered necessary.	University of Manchester Student's Union
JPH2_JPH2.13	Requests for policy wording to require at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses.	The Greater Manchester Strategic Housing Market Assessment . [06.01.02] at Chapter 6.7 investigates the housing needs of Students. Policy JP-H 3 Type, Size and Design of New Housing states that provision to accommodate specific groups, such as students, will be addressed through district local plans. Furthermore, Policy JP-H2 outlines that locally appropriate affordable housing requirements are to	University of Manchester Student's Union

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		be set by each local authority. Therefore no change to the wording of this policy is considered necessary.	
JPH2_JPH2.14	Concern that the Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process, risking inconsistent application of the policy. Therefore requests that the affordable housing policy within PfE be amended to set a standard affordable housing requirement for new development across the GM area.	No changes necessary. Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037. The PfE does not set affordable housing requirements from new development (these are for individual city and borough local plans), instead it includes an overall all numeric target for Greater Manchester. Therefore, whilst it is appropriate to include an allowance for affordable housing when viability permits, there is no requirement within the PfE to achieve a particular level of affordable housing.	See Appendix
JPH2_JPH2.15	There is no clear link between the release of land for housing and the provision of affordable housing. Much stronger policies are needed to require developers to ensure that a proportion of their homes are affordable and to address speculation (which drives up land costs and impacts on the price of housing)	Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037. The PfE does not set affordable housing requirements from new development (these are for individual borough local plans), instead it includes an overall all numeric target for Greater Manchester. Where relevant, detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE). However, overall whilst it is appropriate to include an allowance for affordable housing when viability permits, there is no blanket requirement within the PfE to achieve a particular level of affordable housing. Therefore, no changes are considered necessary.	Gillian Boyle
JPH2_JPH2.16	Development should only be permitted if the percentage of affordable homes can be fixed by agreement with the Planning Authority.	The policy states that affordable housing on new developments will be locally appropriate and set by each local authority.	Edward Beckmann Janine Lawford
JPH2_JPH2.17	Affordable new housing can be fully attained using available vacant properties and brownfield sites without building on Green Belt.	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need. Chapter 5.8 of the] assesses the vacancy levels across the conurbation in 2019. Government guidance is clear that empty properties brought back into	Maureen Buttle Glenn Dillon Bernadette Clough Peter Christie Joanna Harland

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement.	
JPH2_JPH2.18	The proposal that affordable housing can be 'off-site' potentially conflicts with the proposal that there should be 'mixed communities'. Affordable housing should be available within all development areas, including those with premium housing.	No changes necessary. Local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements. This is a matter for local authorities to consider when determining planning applications.	Stephen Hopkins
JPH2_JPH2.19	Support the principle and provision of social housing and affordable housing	Support noted	See Appendix
JPH2_JPH2.20	Affordability has been worsening in recent years and there is a significant number of households who are unable to find suitable homes at an affordable cost.	The aim of the plan is to significantly increase the supply of housing (JP-H1) and contribute to an uplift in the provision of affordable housing across Greater Manchester (JP-H2)	Roy Chapman
JPH2_JPH2.21	A major problem with new housing is that a large %age is bought up by overseas investors, further inflating prices and increasing their "unaffordability".	This issue is considered to be outside the scope of PfE.	Steven Bowater
JPH2_JPH2.22	Creating a new wave of affordable homes can only be achieved by more radical and creative solutions led by national government, but with power and resources in the public, private and mutual sectors, being deployed alongside planning powers which go far beyond simple zoning, statistical and geographical allocations.	As stated within the Housing Topic Paper [06.01.03] – Chapter 3 (paragraph 3.22), there are a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties. As such no changes are considered to be required.	Mossley Town Council
JPH2_JPH2.23	Concern that as currently drafted, it is unclear from what evidence source the target of 60% of the 50,000 affordable homes in Greater Manchester to 2037 being social rent or affordable rent is based.	No changes necessary. The provision for at least 60% being for affordable or social rent across Greater Manchester is set as a target because 26,750 households are identified as being in reasonable preference for housing (Housing Topic Paper [06.01.03] paragraph	Emerson Automation Systems UK Limit

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		6.80). This is also in line with the Greater Manchester Housing Strategy target to deliver at least 50,000 affordable homes by 2037, with 30,000 of these for social rent.	
JPH2_JPH2.24	The plan does nothing to address inequality by providing the affordable housing our area needs and only exacerbates health inequalities.	An Equality Impact Assessment has been undertaken and can be viewed in Appendix B of the Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.02] . Therefore, no changes are considered to be necessary.	James Daly
JPH2_JPH2.25	Should include an option to secure affordable housing through a planning condition as this provides more funding options for RPs and in any event it is not always necessary or appropriate to use the S106 mechanism to secure appropriate affordable housing delivery.	No changes necessary. Draft Policy JP-D2 will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through the most appropriate mechanism, including, but not limited to, planning conditions and s106 planning obligations.	David Morris Seddon Homes Ltd Seddon Homes Ltd
JPH2_JPH2.26	As drafted, JP-H2 does not provide any guidance to developers as to what levels of affordable housing will be required and on which sites, or what is meant by "substantial improvements will be sought". It does not provide a targeted breakdown by area (whether this be market area or district boundary).	No changes necessary. Local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements, as stated within the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] at Chapter 5.1.	Redrow Homes Limited
JPH2_JPH2.27	The policy does not provide any guidance as to when on or off-site contributions will be deemed acceptable.	No changes necessary. Local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements, as stated within the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] at Chapter 5.1.	Redrow Homes Limited
JPH2_JPH2.28	Support for the policy reference to the role of off-site built homes in delivering the targets	Your support is welcomed.	Greater Manchester Housing Providers GLP Trows LLP and BDW Trading Limited
	Housing Targets and Delivery		
JPH2_JPH2.29	Setting a housing requirement that goes no further than the standard method only serves to embed and compound current affordability issues (particularly in Bury, Trafford and Stockport where housing needs will be under-provided for).	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be	Morris Homes (North) Ltd Persimmon Homes North West Oltec Group Ltd

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		planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	Peel L&P Investments (North)
JPH2_JPH2.30	GMCA should look at the current affordable housing stock and assess whether it matches current and future affordable housing needs; and plan for any deficit to be met.	No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 4.4 (Pages 86 to 100) Dwelling stock profile provides a profile of the current dwellings in Greater Manchester.	Peter and Diane Martin
JPH2_JPH2.31	The Strategic Housing Market Assessment (SHMA) identifies a total net annual affordable housing requirement of 5,214 dwellings per annum across Greater Manchester. This represents a significant proportion of the total annual housing requirement (>50%), however the PfE only plans for a minimum of 50,000 affordable homes (equating to just 25% of the total annual housing requirement) and significantly lower than identified in the SHMA. There is no evidence provided in the PfE to justify this departure from the evidence base and falling significantly short of meeting the existing need. Furthermore, a delivery rate of 30% is optimistic given that an average of 5% was delivered between 2011/12 and 2019/20.	The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future. The delivery of at least 50,000 affordable dwellings is considered to be an ambitious target for all of Greater Manchester which features in the GM Housing Strategy – though it is not a ceiling on delivery. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing, and can be achieved via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance. For further information, the Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need	Peter and Diane Martin Oltec Group Ltd Hollins Strategic Land Wainhomes (NW) Ltd Taylor Wimpey Highgrove Strategic Land Ltd Lesley Spencer HIMOR, Redrow Homes & VHW Story Homes Limited Woodford Neighbourhood Forum Northern Gateway Development Vehicle Northern Gateway Development Vehicle Northern Gateway Development Vehicle

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		Assessment (pages 207 to 228) provides detailed information on the affordable housing requirement in Greater Manchester.	
JPH2_JPH2.32	In order for Manchester's affordable housing need to be met in full it will be necessary to plan for at least an additional 2,200 affordable homes per annum across Greater Manchester (and around 243,000 homes in total).	No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02]. Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the need for affordable housing in Greater Manchester.	Hollins Strategic Land
JPH2_JPH2.33	Have significant concerns with the policies and the overall approach to housing delivery set out within given that the level of affordable housing need is higher than what is being proposed within the Plan.	See Row 2.52	Save Greater Manchester's Green Belt Stephen Cluer Christopher Russell HIMOR Group
JPH2_JPH2.34	The affordable housing requirements are also much greater than the past levels of delivery and there is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided as there has to be a significant step change in the amount of viable land coming forward to help achieve the anticipated affordable housing requirements in this Policy.	No changes necessary. The national methodology is based on the aim to increase the overall national rates of housing delivery, by setting the rate of market signals adjustment so that across England it will lead to a substantial uplift in housing delivery over and above the base demographic household projections. It is acknowledged that the Greater Manchester target of 50,000 affordable homes represents an uplift on past performance and that meeting this target will require co-ordinated activity by a range of partners. Districts will continue to work proactively with multiple organisations to bring forward more challenging sites. Besides delivery of affordable housing on mixed-tenure development schemes, there are also several other mechanisms that could deliver affordable housing including funding programmes from Homes England, including their Shared Ownership and AHP and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts (CLTs) may also deliver new affordable housing.	See Appendix
JPH2_JPH2.35	Translate Local Housing Need into a housing requirement which is consistent with the identification of affordable need as a 'very high priority'.	It is considered that the housing requirement in the plan is appropriate and consistent with Greater Manchester's objective to deliver an increase in affordable housing. The planning system is not the sole	Persimmon Homes North West

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		mechanism by which affordable housing is provided and it is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 provides more information on the mechanisms available to deliver affordable housing alongside the planning system. Setting an affordable housing requirement at a local borough level is for individual borough local plans. 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' through their Local Plan.	Morris Homes (North) Ltd
JPH2_JPH2.36	Concern that from watching how this has played out with recent builds, affordable housing has not and will not be met as Developers pay contributions instead or they are shared ownership or will end up being bought to rent out.	The definitions of affordable housing for home ownership set out in the NPPF state that provisions should be in place to ensure housing remains at a discount for future eligible households, and where public grant funding is provided there provisions for any receipts to be recycled for alternative affordable housing, or refunded to Government or the relevant authority specified in the funding agreement may be required.	Alison Doherty Carl Southward Jenny Bowring
JPH2_JPH2.37	The housing figures used to calculate the need are over-estimates	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	Bernie Burns
JPH2_JPH2.38	It is unclear how the GMCA expects the requisite levels of affordable housing delivery to come forward based on the housing strategy set out in the PfE given that evidence demonstrates that since 2012, an	No changes necessary. The Housing Topic Paper [06.01.03] – Chapter 3 (paragraph 3.22) stresses that besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms	Story Homes Limited

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	<p>average of only 1,608 affordable dwellings has been provided annually which is around 55% of what would be required to meet the 50,000 target included within the PfE. It is envisaged given the magnitude of the affordable housing issue, that the PfE and its plan for the delivery of the identified 50,000 affordable units will not be found sound at Examination and there will be a continued delay in the delivery of much needed additional housing in Greater Manchester.</p>	<p>which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties.</p>	<p>HIMOR, Redrow Homes Limited and VHW Partnership</p>
JPH2_JPH2.39	<p>Is of the opinion that the housing requirement contained within the PFE as derived from the minimum standard method output is wholly inadequate and the benefits of pursuing a higher housing requirement would include an additional supply of affordable units.</p>	<p>It is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing as well as other sources such as Community Land Trusts.</p>	<p>Story Homes Limited Hollins Strategic Land Peel L&P Investments (North) Ltd</p>
JPH2_JPH2.40	<p>The SHMA identifies a number of other mechanisms that could deliver affordable housing, although the PfE is not clear at any stage how it intends to utilise these methods to address the deficit between the identified need of affordable housing, and the delivery of affordable housing on mixed-tenure development schemes. There is no evidence provided on how any additional funding will be secured in order to bring forward affordable housing schemes.</p>	<p>No changes necessary. As detailed in the Housing Topic Paper [06.01.03] at Chapter 6, enabling the delivery of new homes at the scale necessary to meet local housing targets set through the Joint Plan requires an enhanced and suitably resourced approach to developing and managing the city region's development pipeline. The establishment of the Greater Manchester Delivery Team is central to the task of turning the Greater Manchester pipeline of potential sites into viable, deliverable, investable schemes which can then be brought forward for development. The Delivery Team is supporting the appropriate allocation of resources into site investigation and preparation where this aids the delivery of new housing. Working with district authorities on a match funding basis, they are bringing forward schemes that meet the</p>	<p>Lesley Spencer Taylor Wimpey</p>

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		relevant value for money and deliverability criteria for the receipt of public funding support. Resources are being deployed where they will unlock delivery	
JPH2_JPH2.41	<p>Concern that the actual affordable housing need has not been taken into account when considering whether an uplift to the local housing need is merited. Similarly, no account of the location of the affordable housing need has been factored in when redistributing the housing requirement between the 9 districts. The reduction in the quantum of affordable housing results in some of the districts within Greater Manchester with the lowest level of affordable housing need having the highest increase in their housing targets, and vice versa, creating a situation whereby 5 of the 9 GM9 districts would need to deliver over 50% of their entire housing target to meet their affordable housing needs in full whilst 3 of the 4 districts that would need to deliver a lower proportion of their target to meet affordable housing needs, are the ones that have had their LHN increased. This is illogical and assumes that a person in housing need from Tameside would be content and able to move to another district (such as Wigan) in order to meet their social housing needs when current migration trends suggest that this is highly unlikely to happen.</p>	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]</p> <p>It is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing as well as other sources such as Community Land Trusts.</p> <p>Furthermore, household migration in Greater Manchester has been assessed in the Greater Manchester Strategic Housing Market Assessment [06.01.02] (Chapter 2.2). Our analysis shows that more than four out of every five households who move into a home in Greater Manchester already live here.</p> <p>Chapter 3.2 Standard methodology : Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provides detailed information on the need for affordable housing in</p>	<p>Lesley Spencer Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Taylor Wimpey</p>

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		Greater Manchester. Therefore, it is considered that a change is not necessary as affordable housing has been taken into account when assessing Local Housing Need.	
JPH2_JPH2.42	Support for locally appropriate requirements to be set by each relevant authority, to ensure meeting local need can be tailored accordingly. However, note that it would be helpful if the policy made it clear that Local Plans will set specific affordable housing targets for the different areas of their borough based on local needs and an assessment of viability if there is not scope to set specific targets for each authority at this stage.	This modification is not deemed necessary as Policy H2 states at point 3 that locally appropriate requirements will be set by each local authority.	See Appendix
JPH2_JPH2.43	Concern that any additional affordable housing delivery taken from existing market housing stock will simply place additional pressure on that part of the market.	No changes necessary. Chapter 3.2 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] Standard methodology : Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) confirms that, as with previous methods for assessing housing need, the standard methodology requires an adjustment to be made to consider market signals, specifically the affordability of housing.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels
JPH2_JPH2.44	Consider it imperative that the examination process for the PFE plan confirms that a full review of housing land supply is re-assessed at the Local Plan stage alongside viability and deliverability considerations and if additional land needs to be released for accommodating such needs that can and should be done at the Local Plan stage without the need for a full review of the PFE plan.	No changes necessary. Local Planning Authorities are already required to prepare Local Plans which identify the strategic priorities for the development and use of land in the authority's area in light of housing land supply and need. Furthermore, the NPPF sets a requirement at paragraph 74 for Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The PfE does not preclude the allocation of land through the Local Plan process in light of any housing land supply assessment undertaken by a Local Planning Authority.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels
JPH2_JPH2.45	Question whether the delivery of high density development within the Core Growth Area, including Manchester City Centre will meet the requirements of the wider Greater Manchester housing market,	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in	Crossways Commercial Estates Ltd

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	especially given the fact that 84% of the housing supply in Manchester and 81% of Salfords housing are for flats (majority 1 and 2 bedroom).	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	
JPH2_JPH2.46	Significant concerns that the required level of affordable homes in Bolton, whatever that is ultimately decided to be, is not going to be achieved by relying on the current housing land supply in Bolton	The PfE does not set affordable housing requirements from new development (these are for individual city and borough local plans), instead it includes an overall all numeric target for Greater Manchester. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas. The Districts will continue to work proactively with multiple organisations to bring forward more challenging sites. The Housing Topic Paper [06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges. Therefore, no change is considered necessary.	Rowland Homes Ltd
JPH2_JPH2.47	Concern that with only two strategic sites being proposed in the PFE plan in Trafford, the maximum affordable housing delivery in Trafford is only going to amount to 2,999 affordable homes when there is a need for 6,160 over the plan period. This represents less than 50% of the need and the historic allocations have failed to deliver sufficiently in previous years so affordability ratio is increasing and shortfalls will continue. More sites should be allocated in Trafford to address this.	The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future. The PfE does not set affordable housing requirements from new development across the boroughs, as site allocation policies provide detailed affordable housing policies for specific sites where relevant. Setting an affordable housing requirement at a local borough level is for individual borough local plans. Places for Everyone Policy JP- H 1 sets out the housing need for the 9 districts over the plan period. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities such as Trafford Council 'to set out more detailed policies for specific areas, neighbourhoods or types of development' through their Local Plan.	Highgrove Strategic Land Ltd PD Northern Steels PD Northern Steels Church Commissioners for England Highgrove Strategic Land Ltd PD Northern Steels PD Northern Steels

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JPH2_JPH2.48	The policy stipulates the requirement for 50,000 homes is for all of Greater Manchester but with Stockport having now pulled out, it is not clear as to how this policy can be fully adhered to as it will have no status in Stockport. Requests that ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester/ Plan area.	No changes necessary. Policy JP-H 2 Affordability of New Housing recognises that the 50,000 is a GM ambition not PfE plan target which is why the policy refers to the 9 districts 'share ' of the 50,000. The PfE does not set affordable housing requirements from new development apart from where relevant to specific site allocations, this is for Local Authorities to stipulate through their Local Plans .	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Peter and Diane Martin HIMOR Group Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd
JPH2_JPH2.49	No schedule or trajectory of affordable housing to identify which sites will contribute.	No changes necessary. Chapter 3 of the Housing Topic Paper [06.01.03] (paragraph 3.22) stresses that 5,214dpa is not a target for affordable house building to be delivered solely through the planning system, but a check to understand likely future demand. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] at Chapter 5.1 outlines that Affordable housing is included within the testing as the local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements.	HIMOR Group Hollins Strategic Land
	Viability		
JPH2_JPH2.50	It will be challenging to achieve any affordable housing on previously developed land given cost constraints and limited viability headroom (especially after the significant additional policy burdens proposed by the PfE are accounted for).	The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] and Places for Everyone Strategic Viability Assessment Stage 1 Report Addendum 2021 [03.01.02] outline the GMCA's position regarding viability. The Housing Topic Paper [06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges.	Harworth Group Plc

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JPH2_JPH2.51	There is no evidence to demonstrate that 50,000 affordable homes are viable and deliverable across the sources of housing land supply identified.	<p>It is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. Besides delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing as well as other sources such as Community Land Trusts.</p> <p>Affordable housing can also be delivered via acquisition of existing homes and/or conversion from other uses as well as via new build. It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] and Places for Everyone Strategic Viability Assessment Stage 1 Report Addendum 2021 [03.01.02] outline the GMCA’s position regarding viability, with chapter 5 (pages 17 to 18) providing an update on the housing land supply position. The Housing Topic Paper [06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges.</p>	HIMOR Group Boys & Girls Club of GM
JPH2_JPH2.52	The affordable housing requirement is much greater than the annual housing target being planned for by the PFE plan. A higher overall housing requirement is needed to increase the prospect of delivering 50,000 affordable homes (because as it stands every site will have to deliver 30% affordable housing on average), particularly given the uncertainties of viability and covid-19’s impact upon delivery. Increasing the overall housing requirement and allocating more green	The PfE Plan does not include an ‘affordable housing requirement’. The figure in the SHMA (5,850 households per annum for Greater Manchester as a whole and 5,214 for the 9 districts that make up the PfE plan area) is not an annual requirement or a target for the delivery of affordable house building delivered through the planning system. It is a guide for districts when they are considering what they need to do to deliver the affordable homes we need for the future.	See Appendix

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	<p>belt/higher value sites would lower that proportional target, making it more achievable on a site by site basis. The local housing need should be treated as a starting point and a detailed affordable housing requirement should be set so there is consistency across the 9 boroughs.</p>	<p>The planning system is not the sole mechanism by which affordable housing is provided and it is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system, nor that new build will be the only route to secure additional affordable homes. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing.</p> <p>It should also be acknowledged that – in line with Government policies - the private rented sector has in effect taken on an increasing role in providing housing for households that require financial support in meeting their housing needs, supported by Local Housing Allowance.</p> <p>The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 7 provides more information on the mechanisms available to deliver affordable housing alongside the planning system</p>	
JPH2_JPH2.53	<p>The sites selected lend themselves to larger less affordable housing with a requirement on cars as the main transport with little regard to road infrastructure</p>	<p>The Site Selection Background Paper [03.04.01] details the methodology used to identify potential sites for allocation and the site selection criteria. The site selection criteria included land that is well served by public transport and land which would support the delivery of long-term viable sustainable travel options.</p> <p>The site allocation policies (Chapter 11) set out the affordable housing requirements for each site.</p>	Julie Halliwell
JPH2_JPH2.54	<p>Developers will claim that affordable homes are unviable, especially on Peatland sites.</p>	<p>Where relevant detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE). The Strategic Viability Assessment Stage 1 2020 [03.01.01] and the Stage 1 Report Addendum 2021 [03.01.02] identifies challenges with a significant proportion of our land supply and this is acknowledged within the plan by the provision of a land supply 'buffer'. Housing Topic Paper[06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable</p>	Edward Beckmann

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		housing, where there are viability challenges. Therefore, no changes are considered necessary.	
JPH2_JPH2.55	Concern that suppressing housing supply in districts such as Tameside, also suppresses affordable housing delivery in those areas, limiting delivery to apartment development which is often subject to viability issues which will in turn reduce the proportion of affordable delivery.	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. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites. Therefore, no change is considered necessary.	Metacre Ltd
JPH2_JPH2.56	None of the proposed developments in the Bury area will provide affordable housing, it is not a viable proposition for the developers to provide such housing, there's not enough profit in affordable housing	No changes necessary. Where relevant detailed affordable housing requirements for each Site Allocation are set out within the associated policies (Please see Chapter 11 of the PfE). For the detailed affordable housing requirements related to the Allocations within the borough of Bury please see JP Allocation 7 point 5, JP Allocation 8 point 3 and JP Allocation 9 point 5 which state the minimum affordable housing provision required.	David McLaughlin
JPH2_JPH2.57	The adopted benchmark land values, costs and profit levels are actually underestimated so the dire position in regard to viability which is presented in the SVA is actually worse than stated.	The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] and the Strategic Viability Assessment Stage 1 Report Addendum 2021 [03.01.02] outline the GMCA's position regarding viability. The assumptions are considered to be appropriate therefore changes are not considered to be necessary.	Story Homes Limited
JPH2_JPH2.58	Have undertaken a Strategic Viability Assessment which concludes that only around 10,200 affordable dwellings are capable of being delivered through mixed tenure development delivering onsite affordable housing via Section 106 Agreements . This is despite the	It is not anticipated that the entire share of the 50,000 affordable homes will be delivered through the planning system. Criterion 4 references working with Government to maximise the amount of public funding available to Greater Manchester to deliver affordable housing. Besides	Story Homes Limited

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	PFE committing to delivering at least 50,000 additional affordable homes across GM	delivery of affordable housing from planning obligations, there are also a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing as well as other sources such as Community Land Trusts. in partnership with registered providers and others. The Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] outlines the GMCA's position regarding viability, particularly with respect to affordable housing at Chapter 5.1 (pages 34 to 37). Affordable housing is included within the testing as the local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements. Pages 54-62 of the Housing Topic Paper [06.01.03] set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges Therefore changes are not considered to be necessary.	
JPH2_JPH2.59	This policy aims to establish a specific target in respect of the tenure with criterion 2 stating that at least 60% being for social rent or affordable rent. However, in reality the level and mix of affordable housing will be determined by locally identified housing needs and it is considered inappropriate for a Draft PfE policy to determine the level and type of affordable housing provision across all 9 Districts, given the vastly differing affordability and viability conditions that exist. Policy JP-H 2 should be amended to allow for flexibility on the mix and type of affordable units to respond to arising and evidenced housing needs.	As stated within the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] the PfE does not set affordable housing requirements from new development (these are for individual city and borough local plans), instead it includes an overall minimum target for Greater Manchester. Therefore, whilst it is appropriate to include an allowance for affordable housing when viability permits, there is no requirement within the PfE to achieve a particular level of affordable housing. The provision for at least 60% being for affordable or social rent across Greater Manchester is set as a target because 26,750 households are identified as being in reasonable preference for housing (Housing Topic Paper [06.01.03] paragraph 6.80). Therefore changes are not considered to be necessary.	See Appendix
JPH2_JPH2.60	Concern that there is an increasing focus on apartment development to meet affordable need even though the Viability Assessment	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in	Highgrove Strategic Land Ltd Metacre Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	confirms that much of this supply is unviable, even at only 20% AH delivery	relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 . Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.	
JPH2_JPH2.61	Concerns about the preference of brownfield land and the subsequent extent of the housing land supply that is already unviable for market housing, which casts doubts about the ability of the large proportion of the supply to provide sufficient numbers of and diverse types of affordable housing that are required. Concern that it is predominantly greenfield sites which are able to deliver affordable housing.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The Strategic Viability Assessment Stage 1 2020 [03.01.01] and 2021 Addendum [03.01.02] identifies challenges with our land supply and this is acknowledged within the plan by the provision of a land supply 'buffer'. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 Furthermore, not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.	
JPH2_JPH2.62	The policy should also acknowledge the need to reduce affordable housing requirements where viability considerations undermine deliverability.	No changes necessary. The proposed modification is not considered necessary. A Strategic Viability Assessment [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	Prospect GB and Dobinetts Regeneration
JPH2_JPH2.63	The published viability evidence suggests that barely 6% of the proposed supply could be affordable homes, circa 10,200 in total or less than 640 per annum over the plan period. This equates to only 12% of the calculated annual need for affordable housing and would also represent a more than halving of the recent trend seen since 2012.	No changes necessary. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.	Peel L&P Investments (North) Ltd
JPH2_JPH2.64	Significant concerns around the viability and deliverability of building affordable homes at the level set out within the Plan due to need for Public Sector intervention to achieve viable scheme delivery in low value areas.	No changes necessary. The Housing Topic Paper [06.01.03] outlines that in light of some of the viability challenges identified in low value areas through the Viability Appraisal of the Spatial Framework and subsequent addendum, and the high proportion of brownfield sites, it was considered appropriate to incorporate a slightly larger flexibility allowance of 15% across the plan area. Chapter 7 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] Affordable Housing Need Assessment (pages 207 to 228) confirms that besides delivery of affordable housing on mixed-tenure development schemes, there are also several other mechanisms that could deliver affordable housing including funding programmes from Homes England, including their Shared Ownership and AHP and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts (CLTs) may also deliver new affordable housing.	Harworth Group Plc
	Other		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.65	There are not enough GP services, school facilities or roads to cope with overcrowding. Roads are congested and facilities oversubscribed and this will worsen.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies 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.	Andrew Wales Mike Bolton
JPH2_JPH2.66	Concerns of overcrowding	No changes necessary. The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 4 (pages 39 to 114) provides detail on the characteristic of overcrowding in Greater Manchester and Chapter 5.7 (Pages 153 to 155) details the market signals with regard to overcrowding.	Peter Stratton
JPH2_JPH2.67	Need to cater for single person households.	The Greater Manchester Strategic Housing Market Assessment [06.01.02] Chapter 4.2 (pages 41 to 63) provides a detailed assessment of the characteristics of the housing market area with regard to population and household profile. Locally appropriate requirements will be set by each local authority through their Local Plans. Policy JP-H3 seeks to ensure that development across the plan area should incorporate arrange of dwelling types and sizes to meet local needs, including single person households.	John Smith
JPH2_JPH2.68	Need to check legal compliance of private rentals.	No changes necessary. The legal rights of tenants of private rented properties are outside the scope of the planning system.	John Smith
JPH2_JPH2.69	Concerns regarding crime rates	No changes necessary. Draft Policy JP-P 1 Sustainable Places will require all new development to consider safety issues, including by designing out crime and terrorism, and reducing opportunities for anti-social behaviour.	John Smith
JPH2_JPH2.70	Detail how will this benefit local people to buy local - how will this policy avoid profiteering on new property	No changes necessary. Places for Everyone identifies sufficient land to meet Greater Manchester's housing need which will benefit local people.	Paul Roebuck
JPH2_JPH2.71	The local housing authority 'First Choice Homes' is already building many houses in and around Oldham and other boroughs. There is no requirements for additional social housing.	No changes necessary. The Greater Manchester Strategic Housing Market Assessment . [06.01.02] Chapter 5.5 Households in need and affordability (pages 132 to 150) specifically Figure 5.9: Social Housing	Geoffrey Ralphs

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Registers in Greater Manchester, 2019/20 details the need for social housing in Greater Manchester,	
JPH2_JPH2.72	Existing communities affected by new developments and transport links will be financially impacted in by plans (loss of value), which will cause affordability issues for these people.	The negative effect on the value of properties is not a material planning consideration. No changes necessary.	Julie Riley Jenny Lindoe
JPH2_JPH2.73	Concern that building affordable houses in areas where the houses are not first time buyer/first step homes is not fair on existing residents of areas where they have spent years saving to live. Detail required as to whether affordable homes will also have to pay the higher rates of council tax.	The Greater Manchester Strategic Housing Market Assessment . [06.01.02] Chapter 4.1 provides further information on characteristics of the housing market area such as Council Tax Bands. The plan aims to deliver a diverse mix of values and tenures that include affordable housing as well as some higher value housing. The negative effect on the value of properties is not a material planning consideration.	Sophie Hadfield
JPH2_JPH2.74	Clarification is also sought that the land supply tabulation set out in table 7.3 remains correct in review of the change in the Plan period.	No changes necessary. The land supply tabulation is set out in Table 6.4 of the Housing Topic Paper [06.01.03] and is based on the 2020-2037 existing housing land supply (which was the latest data available at the time of plan preparation) combined with the supply on PfE site allocations.	Save Greater Manchester's Green Belt Stephen Cluer Christopher Russell
JPH2_JPH2.75	The Plan should be offering young families and persons who wish to remain within the local area close to their existing families and communities more comfort and certainty that their voices and needs are being heard, and that they will be supported to find affordable decent homes in their local area, and not simply the potential for a limited contribution which may not meet their requirements.	No changes are considered to be necessary. Places for Everyone identifies sufficient land to meet Greater Manchester's housing need. The plan will significantly increase the supply of housing (JP-H1) and contribute to an uplift in the provision of affordable housing across Greater Manchester (JP-H2). Policy JP-H2 has been informed by the waiting lists of the 9 districts, in particular those in 'reasonable preference'. Policy JP-H2 also makes it clear that the supply of low-cost market housing, to complement the provision of affordable homes and diversify options for low income households will be increased, and locally appropriate requirements for on or off-site affordable housing as part of new developments are to be set by each local authority. Further details in relation to housing need, including affordability can be found in the Greater Manchester Strategic Housing Market Assessment . [06.01.02]. The Statement of Consultation [03.05.01] details the previous consultations and the summary of representations received.	Save Greater Manchester's Green Belt Stephen Cluer Christopher Russell

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.76	The PfE is significantly and substantially different from the GMSF and therefore cannot be considered effectively the same plan.	Comment not relevant to the content of the Homes chapter. Matter addressed elsewhere.	See Appendix
JPH2_JPH2.77	The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.	No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . As detailed in the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	See Appendix
JPH2_JPH2.78	More detail is required: How will infrastructure be paid for.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-C1, JP-C3, JP-C4, 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. Site Allocation policies set out infrastructure requirements of the proposed developments and a Stage 2 viability assessment has been undertaken to demonstrate that the development is viable. Details of this are set out in the individual allocation topic papers. The Plan needs to be read as a whole, therefore no change is considered necessary.	See Appendix
JPH2_JPH2.79	Major partners for employment provision should be identified.	No changes necessary. It is too early in the process to identify businesses to occupy proposed employment provision.	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.80	Public consultation has been poor and information has been inaccessible.	Comment not relevant to the content of the Homes chapter. Matter addressed elsewhere.	See Appendix
JPH2_JPH2.81	The site selection process has not been clear with no explanation as to why some sites in the “call for sites” were excluded from the plan. The rationale for the selection/rejection of every site should be available including considered alternatives.	Site Selection Background Paper [03.04.01] details the methodology and rationale used to identify potential sites for allocation. The appendices provide details of all sites submitted through the Call for Sites Exercises with an explanation of why they were excluded from the plan	See Appendix
JPH2_JPH2.82	Clear delivery plans for infrastructure should be included	No changes necessary. Please see responses to Chapter 12 Delivering the Plan along with Delivery Topic Paper [03.01.05] which provides a strategic summary outlining how delivery, viability and infrastructure considerations have been considered. Site specific infrastructure requirements and issues are set out in the individual site allocation topic papers and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] which details what Greater Manchester wants to achieve in the next five years as the first steps towards delivering our vision for transport	See Appendix
JPH2_JPH2.83	There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify removal of greenbelt protection for some areas and creation of greenbelt in others.. Plan should be rewritten to ensure protection of greenbelt and access to it in line with climate agenda and national policy to increase use of brownfield.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Whilst this comment is not relevant to the content of this policy, the matter is addressed elsewhere in Chapter 4 and Chapter 5, particularly in Policy JP-S 1 Sustainable development which reiterates that a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. Further details in relation to the strategic case	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	
JPH2_JPH2.84	In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.	Each Local Authority has a publicly available Local Development Scheme (LDS) which provides a timetable and management plan for the preparation of local planning policy documents such a Local Plan.	See Appendix
JPH2_JPH2.85	There are no details of how Duty to Cooperate will be achieved.	Comment not relevant to the content of the Homes Chapter. Matter addressed elsewhere.	See Appendix
JPH2_JPH2.86	A 35% uplift for the Manchester City Council area represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.	Comment not relevant to the content of the Homes Chapter. Matter addressed elsewhere.	See Appendix
JPH2_JPH2.87	Calls for Councils to build affordable homes like they did in the past.	No changes necessary. Chapter 7 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] provides an Affordable Housing Need Assessment (pages 207 to 228) and confirms at paragraph 7.3 that besides delivery of affordable housing on mixed-tenure development schemes, there are also several other mechanisms that could deliver affordable housing including funding programmes from Homes England, including their Shared Ownership and AHP and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts (CLTs) may also deliver new affordable housing, whilst some council's in Greater Manchester are directly involved in the provision of new affordable homes (for example Derive in Salford which is a development company wholly owned by the council).	David McLaughlin
JPH2_JPH2.88	Properties built on greenbelt are not intended to cater for mixed tenure or lower income families.	The site allocation policies (Chapter 11) set out the mix, type and affordable housing requirements for each site as appropriate.	Brenda Foley
JPH2_JPH2.89	The infrastructure is not available yet so development will just add to use of road and motorway links, attract multi car commuters adding to pollution and not decreasing it.	Comment not relevant to the content of the Homes chapter. Matter addressed within Chapter 10 Connected Places and Chapter 12 Delivering the Plan which details how infrastructure will be delivered.	Brenda Foley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.90	The only way in which the funding levels required for infrastructure could be achieved would be through a 5% increase in the price of the properties on the site, making the infrastructure for the site undeliverable. (Three Dragons Viability Appraisal), so no guarantee that funding will be reliable, and will only evolve when (if) the funds have been raised.	Comment not relevant to the content of the Homes chapter. Matter addressed within Chapter 10 Connected Places and Chapter 12 Delivering the Plan which details how infrastructure will be delivered,	Jennifer Simm
JPH2_JPH2.91	Affordability has been unattainable because local councils have sold land to developers for them to make a profit, this could have already provided hundreds of homes but greed stopped this. I don't believe the councils will change.	No changes necessary. This is not within the scope of the Places for Everyone plan.	Laura Charlotte Rachel Mellish
JPH2_JPH2.92	Get rid of the right to buy in the Greater Manchester area and throughout England. Selling off good quality rental properties makes it more difficult for people on low incomes	The Right to Buy Scheme is a national policy under the jurisdiction of the Department for Levelling Up, Housing and Communities not the GMCA. As such this not within the scope of the PfE.	Ceridwen Haslam
JPH2_JPH2.93	Focus on non-profit companies to build good, eco-focused homes on reclaimed waste and forgotten lands - No Greenbelt.	Please see Policies JP-S1, JP-S2 and JP-H3 which details how sustainable development will be promoted, particularly in line with the target for development to be net zero by 2028 and how innovation in housing development will be supported. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . Therefore, no changes are considered to be necessary.	Simon Robertson
JPH2_JPH2.94	There is already too much housing and services are over subscribed.	No changes necessary. The Strategic Housing Market Assessment [06.01.02] Chapter 7 Affordable Housing Need Assessment (pages 207	Debra O'Brien

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		to 228) provides detailed information on the need for housing in general and affordable housing in particular, in Greater Manchester.	
JPH2_JPH2.95	Concern that developments will lead to increased CO2 release, with increased traffic and industry	No changes necessary. This matter is not relevant to the affordable housing Policy, Please refer to Chapter 5 Sustainable and Resilient Places of the PfE which addresses sustainable development (Policy JP-S1) and Carbon/Energy (Policy JP-S2).	Bernie Burns
JPH2_JPH2.96	There will be a detrimental effect on those living in the affected areas	No changes necessary. Policy JP-P1 provides a framework to address integration of new development with existing communities.	Bernie Burns
JPH2_JPH2.97	Monitor brownfield land so if any more becomes available it can be used.	No changes necessary. The 2017 Regulations introduced the requirement for all local planning authorities in England to prepare, maintain and publish registers of previously developed land within their area that they consider appropriate for residential development (brownfield land registers. Furthermore, in line with paragraph 74 of the NPPF, all Local Planning Authorities are currently required to identify and update annually a supply of specific deliverable sites, including previously developed land.	Bernie Burns
JPH2_JPH2.98	Development is unsustainable, will cause air pollution, increased risk of flooding, loss of biodiversity, loss of green space and will be for non affordable or non eco homes,	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-S1, JP-S2, and Policy JP-S 5 which state that development should be sustainable, carbon neutral by 2028, and should manage flood risk and surface water run off. Policy JP-S6 details how a comprehensive range of measures will be taken to support improvements in air quality, whilst Policy JP-H3 details how innovation in housing development will be supported. Furthermore, Chapter 8 of the plan which sets out our approach to maintaining and enhancing the green infrastructure network and biodiversity. The Plan needs to be read as a whole, therefore no change is considered necessary.	Vicky Harper
JPH2_JPH2.99	Relying on Office to Residential development as a suitable means of providing for future housing requirements is short sighted given the standard of some of the units being created and the inability of these	No changes necessary. Many of the new dwellings created under office to residential conversions are through the prior approval process and so consideration of the quality of these units by LPAs is limited. Notwithstanding this, they create additional dwellings and are	Lesley Spencer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	units to deliver affordable housing and other social benefits through developer contributions.	considered as part of the housing supply for PfE. Policy JP-J3 makes it clear that that existing employment areas that are important to maintaining a strong and diverse supply of sites and premises in our boroughs will be protected from redevelopment to other uses.	
JPH2_JPH2.100	The policy reads as a general list of objectives rather than providing clear direction to policy makers of Local Plans or any clear guidance as to how planning applications will be considered. Indeed, the objective set are not clear in terms of who is responsible for doing what in relation to achieving the 50,000 target.	No changes necessary. The PfE does not set affordable housing requirements from new development (these are for individual city and borough local plans), instead it includes an overall all numeric target for Greater Manchester. Therefore, whilst it is appropriate to include an allowance for affordable housing when viability permits, there is no requirement within the PfE to achieve a particular level of affordable housing. However, Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Peter and Diane Martin
JPH2_JPH2.101	Must reconsider the necessity of the accelerated target for net zero carbon homes given the greater priority for affordable housing	No changes necessary. Policy JP-S1 deals with sustainable development and it is made clear here that to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives. One objective should not be focused on at the detriment of another. This approach is considered consistent with NPPF as the Plan should be read as a whole.	Home Builders Federation
JPH2_JPH2.102	Policy unsound / not legally compliant (no further details given).	No change is considered necessary. Policy JP-H2 is considered to be consistent with the NPPF and provides an appropriate strategy for the density of new housing which is a key objective of the plan and NPPF.	See Appendix
	Distribution		
JPH2_JPH2.103	Affordable homes will not be spread out equally across GM	Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037. Therefore, no changes are considered necessary.	Janine Lawford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.104	No account of the location of the need has been factored in when redistributing the housing requirement between the 9 authorities and a number of the authorities with the worst affordable housing need are proposing to reduce their average annual requirement (i.e. Bury and Tameside)	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	Lesley Spencer Taylor Wimpey
JPH2_JPH2.105	Concern that the scale, distribution and phasing of new development endorsed under Policy JP-H 1 will not address any immediate shortfalls in affordable housing delivery given the approach taken to suppressing supply in the early parts of the plan period, as part of a staggered approach, which we consider is unjustified and not consistent with the NPPF for reasons set out above.	No changes necessary. Introducing stepped targets is an appropriate mechanism to use in plan making. The factors for determining the stepped targets in Greater Manchester include the need to be realistic at the start of the plan period in terms of the level of masterplanning and infrastructure provision required for the larger more complex sites and also the need to take account of the challenges facing some of the urban land supply compounded by the uncertainties introduced by the Covid pandemic and the UK exit from the European Union. Furthermore besides delivery of affordable housing on mixed-tenure development schemes, there are also several other mechanisms that could deliver affordable housing including funding programmes from Homes England, including their Shared Ownership and AHP and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts (CLTs) may also deliver new affordable housing.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Peter and Diane Martin
JPH2_JPH2.106	The policy could be applied inconsistently across Greater Manchester and needs amendments.	No changes necessary. Policy JP-H 2 Affordability of New Housing outlines that we aim to deliver our share of at least 50,000 additional affordable homes across Greater The policy will be applied by the districts in line with their particular local circumstances	Redrow Homes Limited
	Omitted sites		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPH2_JPH2.107	Reasons for omitting the former site allocation Woodhouses ignores the fact that a primary reason for allocating the sites in the first instance was that Woodhouses is a viable market area that can deliver aspiration housing and affordable housing at the same time. Simply relying on more urban SHLAA sites will not address affordable housing needs in the Borough.	Please refer to Appendix 7 of the Site Selection Background Paper - Summary of Planning Assessments [03.04.09] which details the reasons for the removal of GM Allocation 22.	PD Northern Trust Asset Management

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

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Mix and Type		
JPH3_JPH3.1	The evidence base for the PfE does not identify that 60% of housing need is for apartments and the PfE's household projections wrongly assume that past trends of households forming within apartments will continue by underplaying the need for family housing in order to limit the release of land suitable to meet those needs (i.e. greenfield and Green Belt sites). Apartments will not satisfy the demands of Manchester's growing population for larger family homes and the Plan is over-reliant on the delivery of apartments. This will result in a significant over-supply of apartments and an under-supply of houses; in direct conflict with demographic and market evidence about the shortcomings of the current housing stock and the pressing need to broaden the choice and range of homes available, i.e. by providing larger family housing in locations that will attract and retain skilled workers.	No changes necessary. The Plan seeks to make efficient use of land to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. The Strategic Housing Market Assessment [06.01.02] looks at the composition of population growth and forecasts for smaller households.	See Appendix
JPH3_JPH3.2	For an ageing society a wide range of housing options will be needed across both private and social housing sectors, from retirement properties, to supported housing options such as extra care, to innovations such as co-housing.	No changes necessary. Policy JP-H3 ensures that development across the plan area will seek to incorporate a range of dwelling types including specialist housing for older households and vulnerable people. includes housing for older households and vulnerable people. This is also considered at paragraph 7.32 of the Plan.	Louise Seddon Manchester University Hospitals NHS
JPH3_JPH3.3	Desire for more houses with gardens for single people	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	John Smith
JPH3_JPH3.4	Housing for able-bodied over 60's is required.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Colin Walters

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JPH3_JPH3.5	Catering for large houses for social rent is not required.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Geoffrey Ralphs
JPH3_JPH3.6	The needs for Gypsies and Travellers could be met through strategic allocations, to give more certainty that sufficient sites will be provided. Cheshire West and Chester Council question whether leaving the provision of housing for specific groups such as travelling people indicates that the plan is not positively prepared or be sound as it may result in a delay provision of the required sites. Cheshire West and Chester Council (CwaC) would like reassurance that lack of provision for Gypsies and Travellers within the Greater Manchester area in the short-term will not result in increased demand in the CwaC area.	No changes necessary. The Greater Manchester authorities agreed to deal with matters relating to Gypsy and Traveller Accommodation through local planning documents, not a strategic document such as the PfE. Nevertheless, an assessment of Gypsy and Traveller and Travelling Showperson Accommodation has been undertaken to inform district local plan work and is included within the evidence base as Document 06.01.01 .	Cheshire West and Chester Council
JPH3_JPH3.7	Type: There is no evidence that it will be viable to develop 59% of the housing supply across the PfE area as a whole as apartments as envisaged in Table 7.3. The conditions in the urban core do not apply to the outer boroughs, some of which have unrealistic proportions of apartments proposed. Smaller household sizes do not necessarily translate into demand for apartments where larger dwellings are sought to facilitate home working or accommodate visiting relatives. This means 97,280 of the proposed homes in the PFE plan will be apartments compared to 67,601 houses. This is an incredibly high number and proportion of apartments that is simply not justified in the evidence, which shows that no more than 20% of homes need to be apartments.	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density and Policy JP-H2 seeks to deliver substantial improvements in the ability of people to access housing at a price they can afford. Recent delivery rates demonstrate that the relevant targets are deliverable. Details of the housing land supply can be found in the Housing Topic Paper [06.01.03] The Strategic Viability Assessment Stage 1 2020 [03.01.01] and the Stage 1 Report Addendum 2021 [03.01.02] provides sufficient evidence and informs our position related to viability.	Morris Homes (North) Ltd Peter and Diane Martin Hollins Strategic Land Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Boys and Girls Club of Greater Manchester Hollins Strategic Land Peel L&P Investments (North) Ltd
JPH3_JPH3.8	Support the principle of the policy to boost the supply of new homes and diversify markets and the key aim.	Support noted.	Morris Homes (North) Ltd Greater Manchester Housing Providers

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			GLP Trows LLP and BDW Trading Ltd CPRE Emerson Automation Systems UK Ltd Redrow Homes Trafford Prospect GB and Dobinetts Regeneration Manchester University Hospitals NHS Foundation Trust
JPH3_JPH3.9	Type: The approach chosen by PfE achieves no balance in type of provision, saying in paragraph 7.30 that “In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends.”.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 – 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Morris Homes (North) Ltd
JPH3_JPH3.10	Need the majority to be smaller houses and flats in town centres, close to public transport links.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use	JanineAinley

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		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 a significant percentage of development in the core growth area. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	
JPH3_JPH3.11	The Greater Manchester SHMA Update 2021 provides an overview of the change in household types over the plan period, based on the latest 2018-based SNHP, but it does not provide any conclusions as to the split of apartments/dwellings that should be provided by district, and it certainly does not attempt to estimate how many 1, 2, 3 or 4+ bed properties are needed across the study area.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Story Homes Limited HIMOR Group Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd and Persimmon Homes
JPH3_JPH3.12	The proportional split between planned houses and apartments should be reversed so circa 60% growth is provided for houses and 40% growth is given to apartments.	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need.	Peter and Diane Martin Highgrove Strategic Land Ltd Rowland Homes Ltd
JPH3_JPH3.13	Question the purpose of the inclusion of Table 7.3 and whether its inclusion is justified if individual local planning authorities are to determine their own type, size and design of new housing.	No changes necessary. The land supply tabulation is set out in Table 6.4 of the Housing Topic Paper [06.01.03] and is based on the 2020-2037 housing land supply (which was the latest data available at the time of plan preparation) combined with the supply on PfE site allocations. It is considered that this provides a proportionate evidence base to support the strategic policy aims of Policy JP-H3	Emerson Automation Systems UK Limited
JPH3_JPH3.14	Support: that the mix and size of houses will be flexible and determined at a Borough level which will need to be flexible to provide a range and choice of homes to meet the needs of the local area and so that sites remain deliverable, developable and viable.	Support Noted	See Appendix
JPH3_JPH3.15	Any attempt to assess or justify the proposed mix of housing types is fundamentally	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans,	Peter and Diane Martin

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	compromised by the absence of any meaningful forecasting of the need for different sizes or types of homes across the PfE area, within its supporting evidence base. The SHMA completely omits any consideration of the need for different sizes or types of housing. It presents only an analysis of the household profile under a range of different trend-based demographic projections produced by the ONS. This contrasts with previous iterations of the SHMA, which went as far as calculating need based on a number of different scenarios.	masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Local Housing Need is assessed in Chapter 3 of the Strategic Housing Market Assessment [06.01.02]	HIMOR Group Hollins Strategic Land Crossways Commercial Estates Ltd Peel L&P Investments (North) Ltd
JPH3_JPH3.16	There needs to be a rebalancing exercise to establish a more appropriate balance between the level of housing and apartment provision. In the northern Districts in particular, a greater proportion of housing is needed (and evidenced) than is currently proposed under Policy JP-H 3.	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]	Redrow Homes (Lancashire)
JPH3_JPH3.17	The Plan fails to provide an appropriate mix in respect of the of the houses / apartments ratio with a shift towards the high provision of housing through apartment schemes by increasing the housing provision within the Authority with the highest apartments to traditional houses ratio. This is not considered to be the most appropriate mix which responds to the market (particularly in a post-Covid world).	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]	Harworth Group Plc Taylor Wimpey
JPH3_JPH3.18	Object to the assumption outlined in Policy JP-H 3 that the precise mix of dwelling types and sizes will be determined through district local plans. The mix of housing proposed to be delivered as part of a planning application should be determined based on the housing market	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances	Redrow Homes (Trafford)

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	conditions at that time rather than being reliant upon a policy which provides a requirement based on a specific point in time	and deliver an appropriate mix of dwellings across the plan area as a whole.	HIMOR, Redrow Homes Limited and VHW Partnership
JPH3_JPH3.19	Concern that whilst the 2014 Household Projections suggests the growth in single person households will grow significantly within the conurbation compared to family households, a large part of this trend will be influenced by the fact that the conurbation has not seen a significant programme of housing development related to families for a considerable period of time and many growing families will have migrated out to more rural surrounding districts and boroughs where there is a greater supply of homes.	It is considered that no changes are necessary. The approach taken to calculating local housing need based on the 2014-household projections is in accordance with NPPF and NPPG. Using the 2014 projections accounts for a 50 year trend over 5 census points. It is not considered that exceptional circumstances exist to justify departure from the standard methodology. Furthermore, the Greater Manchester Strategic Housing Market Assessment [06.01.02] (April 2021) provides up-to-date evidence of housing needs to support the Places for Everyone. The trend towards smaller households is not as a result of a significant out-migration of families from the conurbation, but is instead reflective of national trends for an increase in older households without dependent children. Notwithstanding this, Policy JP-H3 seeks to incorporate a range of dwelling types and sizes across the plan area, with the precise mix to be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Boys and Girls Club of Greater Manchester
JPH3_JPH3.20	The failure to plan for a sufficient number of homes will significantly hamper efforts to ensure that a genuine mix of dwelling types, and sizes, including specialist housing for older households and vulnerable people, can be delivered within Bury	No changes necessary. Places for Everyone identifies sufficient land to meet Greater Manchester's housing need.. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Hollins Strategic Land
JPH3_JPH3.21	It is unclear how specialist housing for older people and households will be delivered in Bury, particularly early in the plan period, given that the draft Bury allocations, and cross-boundary allocations are located away from existing services/facilities and public transport networks, with improvements within certain sites not expected to be delivered until later	Policy JP-H3 states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Importantly, it includes that where appropriate, this should include incorporating specialist housing for older households and vulnerable people.	Hollins Strategic Land

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	in the plan period based on the evidence submitted in support of the plan	Furthermore, a process of site selection was undertaken, to identify sites. It first gave consideration to previously-developed land and/or that well-served by public transport. Following that it identified sufficient sites to meet the identified needs in this plan which fitted our overall Vision, Strategic Objectives and the sustainability principles of the plan. The Site Selection Background Paper [03.04.01] details the methodology used to identify potential sites for allocation and the site selection criteria in more detail.	
JPH3_JPH3.22	Considers that Policy JP-H 3 has not been prepared using a clear and justified method. The Policies supporting text suggests that the PfE's proposed mix is the result of a broad strategic aim to prioritise redevelopment on brownfield land, rather than an approach based on robust evidence. This approach has naturally necessitated higher density development in the form of apartments, which has not been adequately justified and neglects a clear need for larger family housing across GM and particularly in the south of the conurbation (as evidenced in the GMCA's own SHMA).	In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. The PfE Spatial Strategy (Chapter 4) 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] As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. It is considered that the Policy JP-H3 is consistent with National Policy and a proportionate evidence base has been provided to support the policy, it can be found here: Housing Topic Paper [06.01.03] Housing Topic Paper and The Strategic Housing Market Assessment [06.01.02]	Taylor Wimpey
JPH3_JPH3.23	If the homes that local people need and aspire to is not provided within the nine authorities that these households will look to live outside of the area, which may lead to increased commuting, and the need to travel further distances which could lead to an increased need to travel and greater emissions and could have significant implications for climate change.	No changes necessary. We consider that PfE in seeking to deliver its LHN meets the needs of local people (JP-H1) Policy JP-H3 states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Therefore, the policy is expected to provide the homes that local people need.	Home Builders Federation

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JPH3_JPH3.24	Concerned that this housing land supply will not relate to the needs of all different groups in the community, with a reduction in the range of variety of homes provides	No changes necessary. Policy JP-H3 will improve the range and variety of homes provided. It states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Where appropriate, this should include incorporating specialist housing for older households and vulnerable people. The precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Housing provision to accommodate specific groups, such as students and travelling people, will be addressed through district local plans. Supporting evidence informs this policy, specifically the Strategic Housing Market Assessment [06.01.02] which provides detailed evidence in relation to Greater Manchester's housing need.	Home Builders Federation
JPH3_JPH3.25	Support: this policy confirms that it will be the responsibility of Local Plans, masterplans and other guidance to set a precise mix of dwelling types, sizes in order to reflect local circumstances. This approach is commended, since it allows Manchester City Council to consider its own needs through its Local Plan.	Support noted	Boys and Girls Club of Greater Manchester
JPH3_JPH3.26	Like the London Plan, the Mayor should establish a benchmark performance target for each local authority based on the evidence presented in table 6.3 of the SHMA – a need for 18,634 homes in total (including Stockport). This benchmark target should be for C3 Use Class older persons housing. A separate target for C2 use class extra care bed spaces should also be established.	We do not consider it necessary to set a target for C3 Use Class older persons housing. Stockport is not covered by PfE.	Home Builders Federation
JPH3_JPH3.27	JPA 26 Hazelhurst: Too many large houses are proposed .	The proposed mix and type of housing at Hazelhurst and the justification for this are set out in the site allocation policy and will be considered further as part of the masterplanning process as require under criterion 1. Please refer to our responses to JPA-26 for further information and the site allocation topic paper [10.07.68] .	Jenny Lindoe

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JPH3_JPH3.28	The needs of students and travelling people will also be met at the local level. In the context of Manchester and Salford which have very large student populations and ambitious higher education establishments, the need for student housing should be assessed over and above the standard housing requirements set by the PFE plan.	No changes necessary. As made clear in JP-H3, Housing provision to accommodate specific groups, such as students, will be addressed through district local plans.	Peter and Diane Martin Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels
JPH3_JPH3.29	The proposal that of the current housing land supply in Bolton, 60% will provide houses and 40% will provide apartments over the plan period, resulting in a high number and proportion of apartments is not justified by any evidence on the need for this number of apartments in Bolton.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. The PfE Spatial Strategy (Chapter 4) 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] As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. It is considered that the Policy JP-H3 is consistent with National Policy and a proportionate evidence base has been provided to support the policy, it can be found here: Housing Topic Paper [06.01.03] Housing Topic Paper and The Strategic Housing Market Assessment [06.01.02]	Rowland Homes Ltd
JPH3_JPH3.30	Support: Allocation at Davenport Green is well placed to deliver a variety of dwelling types and sizes to best reflect the different densities likely to be delivered across the site	Support Noted for the Timperley Wedge site allocation.	Royal London Asset Management
JPH3_JPH3.31	Concern that the proposed split directly contrasts with the evidence on needs identified in the SHMA. Analysis undertaken demonstrates that the proposed split of houses and apartments in the PFE is a poor match with the actual demand which is projected to arise between 2021 and 2037 based on the ONS 2018-based Household Projections and patterns of occupancy by household type. The analysis forecasts that 60% of demand will be for larger family properties (3+ bedrooms) which	As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. . As indicated in the table on page 135 of the Plan, the split between apartments and houses is expected to vary across the boroughs, with all boroughs except Salford, Trafford and Manchester	Peter and Diane Martin Richborough Estates Highgrove Strategic Land Ltd PD Northern Steels Taylor Wimpey

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	is significantly more than the figure for dwelling houses that is claimed in the HLSS. The supply of a more diverse range of housing product would ensure that the market is able to better absorb the high delivery rates. As such, the proposed 64%-36% split is not based on proportionate evidence and is therefore not justified and unsound failing to comply with paragraph 35 of the NPPF	forecast for 60% (or more) of housing development to be houses rather than apartments between 2020 and 2037, reflecting the SHMA. The high proportion of new apartments in Manchester, Salford and Trafford reflects the fact they are within the Core Growth Area which includes very accessible locations such as the City Centre and The Quays where development in the form of high density apartments is considered to be most appropriate. It is considered that the Strategic Housing Market Assessment [06.01.02] provides sufficiently detailed evidence in relation to Greater Manchester's housing need which corresponds with the proposed split within the Plan.	Redrow Homes (Lancashire) Story Homes Limited
JPH3_JPH3.32	Principle: The PfE fails to provide the necessary evidence that a sufficient range of sizes, types or tenures of housing will be provided for through its strategy, in order to meet identified needs and presents a risk of under-delivery.	No changes necessary. It is considered that a proportionate evidence base has been provided to support the policy, it can be found here: Strategic Housing Market Assessment [06.01.02], and Housing Topic Paper [06.01.03].	Peel L&P Investments (North) Ltd
JPH3_JPH3.33	The proportion of apartments in the inner growth areas such as Trafford (64%,) Manchester (84%) and Salford (81%) appears too high and unreflective of our experience of the high levels of need and demand for family houses in these areas.	No changes necessary. The Strategic Housing Market Assessment [06.01.02] provides an assessment of the need for different sizes, types and values of homes at Chapter 4, section 4.6. Recent evidence is that Manchester city centre and Salford city centre have the strongest housing market in Greater Manchester in terms of sales volumes, with the apartments being a significant part of that offer. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends	Greater Manchester Housing Providers
JPH3_JPH3.34	SHMA shows Manchester and Salford have experienced overcrowding which is considered to be linking to increase in apartments; the PfE proposal for 80% of new homes will be apartments will not address this	No changes necessary. Policy JP-H3 will require all new dwellings to comply with the nationally described space standards. This is informed by the Strategic Housing Market Assessment [06.01.02] which outlines the areas issues related to over-crowding and consequently, the Housing Topic Paper [06.01.03] which concludes at paragraph 6.90 that	HIMOR Group Hollins Strategic Land Hollins Strategic Land

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		it is essential that new housing achieves minimum standards that will help to ensure that it is able to meet identified needs.	
JPH3_JPH3.35	Object to the assumption outlined in Policy JP-H 3 that the precise mix of dwelling types and sizes will be determined through district local plans. Precise mix cannot be left to Local Plans. Mix needs to be understood now so that it can be factored into the overall strategy. Policy should be amended so that it sets out the precise mix now, it is a strategic issue which directly links to housing land supply and GB release. Consider there is a need to release additional land in the outer parts of the conurbation to address the need for family housing.	It is considered appropriate for the precise mix of dwelling types and sizes to be determined through district local plans as set out in Policy JP-H3.	HIMOR Group Hollins Strategic Land Hollins Strategic Land HIMOR, Redrow Homes Limited and VHW Partnership
	Affordable Housing		
JPH3_JPH3.36	Concern that affordable housing policies are not currently applied in full so wishes this policy to be fully applied.	This matter is addressed elsewhere, please refer to Policy JP-H2 and the associated responses.	Trevor Widdop
JPH3_JPH3.37	A relative oversupply of apartments will make family homes less affordable (constraining the supply of family housing will compound competition for family homes in desirable areas, thereby driving up prices, and forcing skilled workers to leave Greater Manchester in order to access affordably priced family housing within a reasonable commuting distance of their place of work).	The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 . Further details in relation to housing need, including affordability can be found in the Strategic Housing Market Assessment [06.01.02]. Through the delivery of affordable housing in line with Policy JP-H2 and Policy JP-H3, we will seek to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations, helping to ensure that Greater Manchester can attract and retain skilled workers, bring more money into local economies and deliver more mixed and inclusive communities. Therefore no changes are considered necessary.	Home Builders Federation Story Homes Limited
JPH3_JPH3.38	Affordable housing needs should be met on-site to help create mixed and balanced communities.	No changes necessary. Policy H2 in the PfE will support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), with locally appropriate requirements being set by each local authority.	Linus Morlocks

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JPH3_JPH3.39	Concern that housing will not be affordable and will only be executive, with limited provision for local people.	Policy JP-H2 seeks improvements in the ability of people to access housing at a price they can afford. Individual allocation policies set out the proposed mix and type of housing on each site.	See Appendix
JPH3_JPH3.40	Types of houses currently being built are not affordable at approximately £500,000	No changes necessary. As set out in Policy JP-H3, development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. Furthermore, please refer to Policy JP-H 2 which reiterates our aims to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037 of a mix of types and tenures (including social or affordable rent) to deliver mixed communities. Individual allocation policies set out the proposed mix and type of housing on each site	Thomas Michael Norris
JPH3_JPH3.41	Any housing development should bring with it more prescriptive eco credentials and affordable housing requirements	No changes necessary. Policy JP-S2 sets an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations, and from 2028 should be net zero carbon and they should be net zero carbon from 2028. The draft affordable housing Policy JP-H2 reiterates our aims to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037. Individual allocation policies set out the proposed mix and type of housing on each site, including affordable housing.	Julie Halliwell
JPH3_JPH3.42	The Plan aims to deliver 30,000 homes for social/affordable rent however on many of the allocation sites, such a Stakehill, it states it “includes higher value properties” with a “garden village approach”. Is this what is needed and are £350,000 -500,000 homes affordable? Questions as to whether the allocations in the plan are sufficiently planning for affordable housing for young people and families.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Furthermore, with regard to social/affordable rent, Policy H2 reiterates the aim to support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), however clarifies that locally appropriate requirements will be set by each local authority. Where relevant detailed affordable housing requirements for each Site	JanineLawford

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		Allocation are set out within the associated policies (Please see Chapter 11 of the PfE).	
JPH3_JPH3.43	The plans for the types and affordability of homes to be built is very vague, with no clear definition of what is an affordable property . There are no indications of how many of each type of property will be built. There is no justification of why those properties can't be located on brownfield sites. Requests more detailed plans that developers are made to adhere to.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. As outlined in Table 7.1, over 90% of land identified for housing is in the urban core, the majority of which is brownfield	Andrew Richardson
JPH3_JPH3.44	Affordability: Given the SHMA is based on a far lower level of apartments (25%) than that now proposed (59%), and acknowledges that this mix will only deliver 20% of the required AH through market led delivery; this raises serious questions as to the level of affordable delivery that will be achieved with over more than double the proportion of apartments, given these are known to generate viability issues. This indicates that , in order to meet the target 50,000 units GMCA and its partners will need to seek alternative forms of delivery.	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites As stated within the Housing Topic Paper [06.01.03] at Chapter 3 (paragraph 3.22), there are a number of other mechanisms which could deliver affordable housing. These include a wide range of funding programmes from Homes England, including their Shared Ownership and Affordable Homes Programme and funding for specialist forms of affordable housing. Other sources such as Community Land Trusts may also deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well other factors such as the proposed extension of the Right to Buy to housing association properties.	Peter and Diane Martin Highgrove Strategic Land Ltd Rowland Homes Ltd
JPH3_JPH3.45	Building in the city centre on predominantly brownfield sites will significantly reduce the affordable units available across the region	Not relevant to this policy. See comments to Policy JP-H2	Landowners of Holme Valley
	Size, Space and Accessibility		

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JPH3_JPH3.46	Policy JP-H 3 There is no evidence to justify the need for all housing to accord with Part M4 (2) of the building regulations. This policy is contrary to paragraph 62 of the NPPF. Amend the wording of policy to reflect the fact that a 100% requirement is not suitable	No changes necessary. The wording of the policy allows for specific site circumstances to be taken into account.	Gary Hoerty Gary Hoerty
JPH3_JPH3.47	If sufficient evidence is forthcoming to support the requirement to meet the NDSS and the policy is to remain in the Plan then an appropriate transition period should be included within the policy.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]	Rowland Homes Ltd Miller Homes Barratt Manchester Limited EON Plant Ltd LQ Estates and Trafford HT
JPH3_JPH3.48	Space and Accessibility Standards: National guidance is clear that where the nationally described space standards or universal use of the 'accessible and adaptable' standard is proposed, this must be substantiated by evidence. There is insufficient evidence to justify a policy requiring compliance with NDSS and certainly not across the board on all new residential development. The Combined Authority are advised to revisit this and undertake the appropriate evidence gathering if they propose to continue with such a policy.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]	Morris Homes (North) Ltd Oltec Group Ltd Rowland Homes Ltd Miller Homes Barratt Manchester Limited LQ Estates and Trafford HT Emery Planning
JPH3_JPH3.49	Space and Accessibility Standards: It should be borne in mind that the use of the standards incurs costs and that these may run counter to other objectives of the Spatial Framework. Paragraph 7.33 states that "cost considerations for both developers and households are placing further downward pressure on dwelling size". These will not be resolved by only allowing the construction of larger properties. Give the viability issues identified across much of Greater Manchester in the Strategic Viability Assessment, the likely result will be to reduce housing completions.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03] Furthermore, Paragraph 4.2.7 of the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] confirms that an alternative approach to calculating residential land values which ensures that the value estimates used for the study reflect actual market behaviour has been utilised to avoid any issues (sometimes expressed by the development industry around price points) when using the Nationally Defined Space Standards to derive an average house size.	Morris Homes (North) Ltd GLP Trows LLP and BDW Trading Limited

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JPH3_JPH3.50	Has the Combined Authority considered the implications on viability of development if it were to apply NDSS to new development? Concern that the Combined Authority has not adequately assessed whether there is evidence of the need for NDSS to be applied, let alone to what type of housing and in what proportion (there is currently no evidence presented that states that NDSS should be applied across the board) and finally, we cannot see an assessment of viability if NDSS were required.	The Strategic Viability Assessment Stage 1 2020 [03.01.01] and Stage 2 [03.01.04] assessed the impact of the Nationally Defined Space Standards sufficiently. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03] .	Kellen Home GLP Trows LLP and BDW Trading Limited
JPH3_JPH3.51	Supportive of the approach identified however suggest that caution should be taken over the proposed blanket introduction of the Nationally Described Space Standards (NDSS). Any introduction of NDSS should take into account the interlinked market and viability issues for each Housing Market Area (HMA), which varies significantly across the Plan area. Suggest that this aspect of the policy is amended to allow flexibility.	No changes necessary. It is considered Strategic Viability Assessment Stage 1 2020 [03.01.01] and Stage 2 [03.01.04] assessed the impact of the Nationally Defined Space Standards sufficiently and that adequate evidence to justify the application of NDSS has been provided.	Northern Gateway Development Vehicle LLP Northern Gateway Development Vehicle Northern Gateway Development Vehicle GLP Trows LLP and BDW Trading Limited
JPH3_JPH3.52	Should give careful consideration to the Policy JP-H3 requirement for all new dwellings in Greater Manchester to comply with the nationally described space standards having regard to the impact upon achieving the proposed Policy JP-H4 (Density of New Housing)	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]	See Appendix
JPH3_JPH3.53	It should be for each district to set Space Standards in their new Local Plans, if appropriate, and by taking note of the evidence required to set such standards	No changes necessary. It is considered appropriate for a strategic plan such as PfE to require new development to meet NDSS. Local plans will provide more detail on the application of this at a local level.	Rowland Homes Ltd Miller Homes Barratt Manchester Limited EON Plant Ltd LQ Estates and Trafford HT
JPH3_JPH3.54	The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan	With regard to policy JP-H3, the 'accessible and adaptable' standard referred to is defined within Part M4(2) of the Building Regulations. Building regulations set standards for the design and construction of buildings to ensure the safety and health for people in or about those buildings. Design and Construction Professionals must adhere to these	Maggie Griffiths

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		<p>regulations. They also include requirements to ensure that facilities are provided for people, including those with disabilities, to access and move around inside buildings.</p> <p>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</p>	
JPH3_JPH3.55	Support: Welcomes proposals in JP-H3 for new dwellings to comply with Nationally Described Space Standards, providing a level playing field for all housing developers, providing adequate space in new homes to facilitate home working post-pandemic and driving appropriate density of new housing developments. It is crucial that this is applied consistently across the GM LAs.	Support Noted	Greater Manchester Housing Providers
JPH3_JPH3.56	Houses built need to be appropriate in size and quality for the area they are allocated, so as not to devalue and erode existing community spirit in already established housing areas. Only build suitable homes that integrate with the established community they are to be built in.	<p>No changes necessary. Policy JP-H3 require all new housing development to comply with the nationally described space standards and the higher Building Regulation standard, to be accessible and adaptable. Other policies in the plan provide an appropriate framework to deliver sustainable homes integrating within existing communities, for example JP-P1, JP-S1, JP-S2.</p> <p>As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.</p>	Steven Brown Tina Brown
JPH3_JPH3.57	Space and Accessibility Standards: The policy sets out concerns about “less adaptable dwellings that are unable to respond to the changing needs of households” yet this is precisely what will result from a high proportion of apartments for which there is only a limited demand outside of the urban core.	No changes necessary. As made clear in Policy JP-H3, All new dwellings must comply with the nationally described space standards; and be built to the ‘accessible and adaptable’ standard in Part M4(2) of the Building Regulations. These standards will apply to both apartments and houses.	Morris Homes (North) Ltd

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JPH3_JPH3.58	Space and Accessibility Standards: Neither the policy itself nor the Housing Topic Paper refer to the necessary evidence and so the policy approach cannot be considered as 'sound'.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]	Morris Homes (North) Ltd
JPH3_JPH3.59	Type: Paragraph 7.33 states "The provision of appropriate outdoor amenity space will...be vital in delivering high quality homes that support good health". The importance attached to this by consumers has increased due to Covid-19, as demonstrated by the strong demand experienced by volume housebuilders. The PfE approach is manifestly incoherent as, notwithstanding issues of consumer demand and viability, it is not possible to provide 'vital' amenity space to the degree required with such imbalanced provision.	No changes necessary. Policy JP-P1 Sustainable Places sets out the principles that new development should follow to create liveable and healthy communities. This includes access to green spaces (Clause 9). Chapter 8 Greener Places provides the policy framework for the protection and enhancement of the network of open spaces and other green infrastructure that are essential to contributing to the long-term attractiveness of these neighbourhoods	Morris Homes (North) Ltd Richborough Estates Home Builders Federation
JPH3_JPH3.60	It is appropriate to plan for a higher proportion of houses rather than apartments outside of the urban core to achieve both the overall housing numbers proposed and to provide the private amenity space required to provide residential amenity. An evidence-based approach is necessary to any application of specific space and accessibility standards.	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03] The figures in Table 7.3 demonstrate that the majority of homes proposed outside of the urban core (Manchester and Salford) are houses not apartments.	Morris Homes (North) Ltd Richborough Estates
JPH3_JPH3.61	The market is changing following the recent disruption caused by Covid. The desire to live and work in the city is not as it was and the demand for residential properties with more space has increased exponentially	No changes necessary. As detailed in the plan, Covid-19 has had a major impact on the way people live and work over the shorter term with a high degree of uncertainty over its impact in the long term. In response the Government has been very clear that we need to positively plan for recovery. As considered in Chapter 2 of the Housing Topic Paper [06.01.03] , while Brexit and the Covid-19 pandemic may alter future population and household trends, any attempt to adjust forward projections would have a high degree of uncertainty, even if Government had not introduced the standardised methodology. Furthermore, 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	Story Homes Limited

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		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] .	
JPH3_JPH3.62	Requests for fewer 4 bedroom houses and more 2 and 3 bedroom houses	As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. Individual allocation policies set out the proposed mix and type of housing on each site	David Hawes
JPH3_JPH3.63	Not consistent with National Policy - the policy is contrary to paragraph 62 of the NPPF in that the need for accessible and adaptable housing is overstated, rather than being reflected in the policy.	No changes necessary. It is considered that the Policy JP-H3 is consistent with National Policy and a proportionate evidence base has been provided to support the policy, it can be found here: Housing Topic Paper [06.01.03] .	Oltec Group Ltd Redrow Homes Limited BDW Trading Ltd Jones Homes (North West) Ltd
	Design		
JPH3_JPH3.64	The plan lacks a tall building policy or tall building zone.	Tall Buildings is a matter to be addressed by individual authorities though their borough's Local Plan and where appropriate design codes. No changes necessary.	Louise Bolotin
JPH3_JPH3.65	Type: Support for focusing a significant proportion of housing growth in the northern areas will assist in boosting the supply of well designed adaptable new homes and that this will deliver higher value housing relative to prevailing values in the local area.	Support noted.	Morris Homes (North) Ltd
JPH3_JPH3.66	Design: People need space and storage. New homes seem to lack garages/suitable storage areas. People now work from home more and need an area they can set up as a working area	No changes necessary. Policy JP-H3 proposes that all new dwellings must comply with the nationally described space standards	Jill Neal Joanna Harland
JPH3_JPH3.67	Should include a commitment for each local authority to produce a design code before the end of 2022	No changes necessary. The National Planning Policy Framework (NPPF) makes clear that local planning authorities should ensure that visual tools such as design codes and guides are used to inform development proposals to provide maximum clarity about design	CPRE

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		expectations at an early stage and reflect local character and preferences. The National Design Guide and the National Model Design Code are required by the NPPF to be used to guide decisions on applications in the absence of locally produced design guides or design codes. There is currently no statutory requirement for Local Authorities to produce a design code by the end of 2022.	
JPH3_JPH3.68	Design: Houses should be made to tackle climate change. There are houses made of materials that don't need central heating or cooling as the materials naturally do this (such as cork). We must build houses like this and not cheap continually leak heat and are hot on summer houses.	No changes necessary. Policy JP-S 2 Carbon and Energy sets the expectation that new development will be net zero carbon from 2028 with an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations.	Joanna Harland
JPH3_JPH3.69	Given the recent pandemic there is increasing momentum for a high-quality design agenda, larger homes and matters such as well-being, enjoyment of private and public open space and enhanced connectivity through the urban environment so questions whether a sole reliance on high density housing in city centre locations will help meet the aims of the Building Better, Building Beautiful Commission report and the Place Alliances Place Value & the Ladder of Place Quality report.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	Landowners of Holme Valley Richborough Estates Hollins Strategic Land Crossways Commercial Estates Ltd Home Builders Federation Redrow Homes (Lancashire) Peel L&P Investments (North) Ltd
JPH3_JPH3.70	Concern that at a strategic level the changes since 2019 to the NPPF with a much greater emphasis on design quality (paragraph 8b and Chapter 12), the mandatory use of Design Codes and striving to achieve beautiful places have not been reflected within the Plan.	The provisions of NPPF apply to development within the PfE and do not need to be repeated in this plan. It is for the individual boroughs to prepare Design Guides and Codes	Historic England
JPH3_JPH3.71	Whilst recognising that paragraph 127 of the NPPF states that Plans should, at the most appropriate level, set out a clear design vision and expectations, it is our view that the appropriate level for a strategic broad	Policy JP-P1 outlines the key attributes of sustainable places including the importance of design. It is considered that this provides an appropriate policy framework and is in line with NPPF.	Historic England

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	level vision of expectations for design quality in Greater Manchester excluding Stockport is the Places for Everyone plan.	Design related issues are addressed in the relevant site allocation topic papers. Local Authorities should prepare Design Codes as required by the National Planning Policy Framework, however, we do not consider there to be merit in repeating the national policy requirement as this is not the appropriate level.	
JPH3_JPH3.72	The policy should ideally be split into two, with a separate policy on good design as a wider strategic matter, taking account of the current NPPF, the National Design Guide and other design guidance in setting an overarching expectation of good design across the plan area that will help drive regeneration. This should refer to the historic environment and the importance of heritage to local character and distinctiveness. This is important in order that the necessary status and direction is given to ensure that good design is properly reflected in local plans.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1 and JP- P2. The Plan needs to be read as a whole, therefore no change is considered necessary. Local Authorities should prepare Design Codes as required by the National Planning Policy Framework, however, we do not consider there to be merit in repeating the national policy requirement as this is not the appropriate level. Site specific design related issues are addressed in the relevant site allocation topic papers where appropriate.	Historic England
JPH3_JPH3.73	Concerned that the policy, as with other policies in this chapter fails to recognise that communities of Greater Manchester feel passionately about their built and historic environment and identifying the elements that are special to them can create housing developments which not only achieve their objectives but create places that they are proud of and reinforce local distinctiveness. Therefore the policy will not sustain and enhance its historic environment and the character and distinctiveness of the different places which make up the area and is not consistent with paragraph 190 of the NPPF.	The built and historic environment is recognised through the evidence base supporting Chapter 8 Places for People. Policy JP-P 2 Heritage ensures that particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. Policy JP-P2 requires development proposals, such as housing developments, affecting a designated heritage asset (or an archaeological site of national importance) and a conservation area to conserve those elements which contribute to its significance including those identified in any conservation area appraisal as making a positive contribution to the area. The plan needs to be read as a whole therefore no changes are considered necessary	Historic England
JPH3_JPH3.74	In order to deliver the housing, local distinctiveness is lost because of the reliance of standard house types which do not relate to its existing context and local characteristics such as materials or architectural styles, against the core principles of sustainable development and the conservation and enhancement of the historic environment.	Policy JP-P1 Sustainable Places requires that development should be distinctive, with a clear identity which responds to the natural environment, landscape features, historic environment and local history and culture;enables a clear understanding of how the place has	Historic England

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		<p>developed; respects and acknowledges the character and identify of the locality in terms of design, siting, size, scale and materials use</p> <p>The built and historic environment is recognised through the evidence base supporting Chapter 8 Places for People. Policy JP-P 2 Heritage ensures that particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm.</p> <p>The Plan should be read as a whole therefore no change is considered necessary.</p>	
	Density		
JPH3_JPH3.75	<p>In addition to identifying the proposed density at the site, the SHLAAs and Plan should:</p> <ol style="list-style-type: none"> 1. clearly indicate if the site meets the criteria for the minimum density specification and state the prescribed minimum density, regardless of whether it will deliver the density. 2. clearly state the average density projected in the SHLAAs for each density categorization in the specification, for each of the nine districts. <p>clearly state how many of the sites are projected by the SHLAAs to deliver the prescribed density, and how many will not, for each density categorization in the specification, for each of the nine districts.</p>	<p>We have published a comprehensive land supply position statement within the Housing Topic Paper [06.01.03]. In compiling this districts have considered the requirements of the density policy alongside other factors in assessing the availability and deliverability of sites to be included within the SHLAA. Achieving the densities may not always be possible (where sites have planning permission for example) and lower densities may be acceptable where they can be justified.</p>	Save Greater Manchester's Green Belt
JPH3_JPH3.76	<p>The increased proportion of housing to be delivered at high density, particularly apartments but housing generally, is not suitable for the range and mix of dwelling types required. While the SHMAA does indicate growth in demand for smaller dwellings there are still needs for detached and semi-detached and larger dwellings. Once more, this is inevitable given the concentration in the Inner Growth Zone.</p>	<p>No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.</p>	Rosedale Property Holdings Limited

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JPH3_JPH3.77	In order to limit the need for Green Belt release, the tabulation and overall proposal for 35 dwellings per hectare should be revisited, particularly for brownfield sites in sustainable locations, in order to ensure that existing land available for development is being used as effectively and efficiently as possible. This will maximise the benefits to be achieved from development of land within urban areas.	No changes necessary. JP-H4 policy sets out our approach to maximise use of brownfield land, and does not set an overall proposal for 35 dph. Allocation policies provide information on mix and type for each site where appropriate form of apartments and town houses, continuing recent trends. Please refer to JP-H4.	Save Greater Manchester's Green Belt Bernie Burns
JPH3_JPH3.78	Request that no Green Belt allocated for housing should be released until the plan demonstrates the deliverability of its minimum density specification.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Save Greater Manchester's Green Belt
	Delivery		
JPH3_JPH3.79	A strategy to guarantee housing delivery rates must be provided as several of the authorities involved have consistently failed to meet housing delivery targets	Not relevant to this policy, please see comments in relation to JP-H1.	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.80	The strategy takes no account of historic fluctuations in delivery related to market cycles and investor sentiment.	Places for Everyone is a long-term plan for the 9 boroughs reflecting the baseline conditions (including historic under delivery), market cycles and considering investor sentiment. As made clear in the Housing Topic Paper [06.01.03] at paragraph 3.8, historic under-delivery is reflected in the calculation of local housing need. Furthermore, when assessing the housing needs of Greater Manchester and the housing choices available with regard to investor sentiment, the Strategic Housing Market Assessment [06.01.02] concludes at Chapter 6 that the private rented sector is likely to continue to grow, to evolve in terms of the investors	Story Homes Limited

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		and management of rented homes and in the types of households living in the sector. Therefore no changes are considered to be necessary as it is considered that the Plan does take these topics into account.	
JPH3_JPH3.81	Limited analysis has been provided to demonstrate that the market for the continued delivery of large scale apartment blocks will continue in the future and delivery of such a large proportion of a homogenous stock could affect absorption rates as the market reaches saturation point.	No changes necessary. When assessing the housing needs of Greater Manchester and the housing choices available with regard to investor sentiment, in Chapter 6 (section 6.5 specifically) of the Strategic Housing Market Assessment [06.01.02] it is concluded that the private rented sector is likely to continue to grow, to evolve in terms of the investors and management of rented homes and in the types of households living in the sector.	Story Homes Limited
	Distribution		
JPH3_JPH3.82	Site selection in Bury should be realigned with areas of need closer to public transport links and employment areas which they currently are not anywhere near.	No changes necessary. The Site Selection Background Paper [03.04.01] details the methodology used to identify potential sites for allocation and the site selection criteria in more detail. It first gave consideration to previously-developed land and/or that well-served by public transport.	Julie Halliwell
JPH3_JPH3.83	Support: The Plan rightly focusses on regeneration but this need not be an aim to be achieved without development in the outer areas, especially when, for example, another objective is to encourage development across the northern Districts.	No changes necessary. 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] Development is proposed in the outer areas and northern districts. Please see Policy JP-Strat 6 Northern Areas and associated policies.	Rosedale Property Holdings Limited
JPH3_JPH3.84	The Plan envisages that 40% of the urban housing supply will be delivered across the City Centre and the Quays which is highly ambitious and not supported by robust evidence as required by paragraph 68 of the NPPF. The City Centre and Quays have not historically been able to support the viable provision of affordable homes. Paragraph 3.34 of the Housing Topic Paper confirms that city centre schemes are not viable to provide affordable housing unless delivered as PRS. It is therefore unclear whether the PfE envisages this area delivering significant amounts of affordable housing and if so on	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. 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]	Story Homes Limited

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	what evidence such an assumption is based and if not, how the assessed levels of affordable housing will be delivered in other parts of GM.		
JPH3_JPH3.85	It is widely acknowledged that whilst the regional centre has seen a significant quantum of apartments delivered in recent years this represents a specific housing market that operates almost independently to the outlying Districts, which have differing needs.	The Strategic Housing Market Assessment [06.01.02] considers the housing market area in Greater Manchester and concludes that hat there is no simple way of subdividing the conurbation into separate identifiable housing market areas. Greater Manchester is a large and diverse city region which, while well connected to our neighbours, can reasonably be defined as a housing market for planning purposes.	Redrow Homes (Lancashire)
JPH3_JPH3.86	There is a reliance upon unproven residential locations/housing markets and there is no evidence to demonstrate whether these areas can viably deliver the types of homes which are in need. There are inherent risks associated with relying on new residential markets to emerge in town centres to the extent proposed in order to meet its housing requirement. This is a significant burden to place on these locations given the context of them not being established residential locations and being reliant on providing new types of products and building new residential markets from a standing start	No changes necessary. As made clear in Housing Topic Paper [06.01.03] (page 52), to deliver the overall strategy for the plan area, it will be vital to develop new markets for housing in some parts of the conurbation. Where relevant, this is considered within the site allocation topic papers.	Wainhomes (NW) Ltd and Persimmon Homes Story Homes Limited
JPH3_JPH3.87	Any increase in housing distribution within the regional centre, and in turn apartments, should be done so independently and not at the expense of outer Districts such as Bury	No change necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	Redrow Homes (Lancashire)
JPH3_JPH3.88	The PfE assumes that supply can be redistributed across the conurbation which is flawed as Greater Manchester is not a single HMA: The latest Strategic Housing Market Assessment concludes that Greater Manchester operates as one HMA. However, this is uses false	It is considered that Chapter 2 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] 'Defining the Housing Market Area' provides a proportionate evidence base to support policy JP-H3	Taylor Wimpey

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	<p>perspective as it only assesses whether Greater Manchester meets the self-containment criteria. It fails to properly apply the guidance set out in the Practice Guide and overlooks clear granular analysis that indicates that GM's housing market is considerably more complex and diverse. Adds that the 2008 SHMA concluded that there were four distinct market areas operating in Greater Manchester.</p>		
JPH3_JPH3.89	<p>General Housing Chapter: The PfE and Local Plans need to allocate land for small and medium housing sites as well as larger strategic sites. Some Green Belt land needs to be released to accommodate the smaller growth on the edge of towns and villages. The distribution of these sites should be addressed at both Greater Manchester and local level.</p>	<p>No changes necessary. The majority of land identified for housing is in the urban area. Details of the existing land supply is found within the Housing Topic Paper [06.01.03] and it comprises a wide range of sites. 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 Site Selection Background Paper [03.04.01] details the methodology used to identify potential sites for allocation and the site selection criteria in more detail. Places for Everyone Policy JP- H 1 sets out the housing need for the 9 districts over the plan period. 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' through their Local Plan.</p>	See Appendix
JPH3_JPH3.90	<p>Concern that proposals to rebalance housing market of the north and south of Manchester to attract more housing to the northern districts and away from the more affluent areas in the south by providing high quality executive houses is not reflected in the land allocations and policies of local plans (i.e. Oldham Draft Local Plan).</p>	<p>No changes necessary. Spatial distribution outlined in H1 is considered to support delivery of the spatial strategy. Oldham Council is in the process of reviewing its Local Plan which will help to support delivery, and be set within the strategic context, of Places for Everyone whilst addressing local priorities and regeneration ambitions.</p>	See Appendix
JPH3_JPH3.91	<p>A key element in Oldham's housing policy to provide choice to meet demand and provide an ability to choose what type of home they live in and where it is, however PfE appears to greatly reduce the choice, particularly choice of location. A significant proportion of new housing is directed to cities, towns and urban areas, which is likely to widen the gap between house prices in inner, suburban and rural areas, and a lack of suitable housing sites in suburban areas will discourage families from</p>	<p>No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the</p>	See Appendix

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	moving to north Manchester. This is unacceptable and need for homes should be balanced by a range of sites in suburban areas. Inevitably this means the PfE needs to look to Green Belt and OPOL to provide this as Local Plans will be restricted by the Green Belt release identified by the PfE.	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] . As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. Smaller households are forecast to account for over half of the growth in households. It is anticipated that this will further strengthen the demand in apartments, particularly given cost pressures and the increased reliance on private rented accommodation. The Strategic Housing Market Assessment [06.01.02] provides detailed evidence in relation to Greater Manchester's housing need.	
	Viability		
JPH3_JPH3.92	Much of the supply in Wigan is already unviable it is difficult to see how affordable housing needs for all types and sizes of homes are going to be met.	Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites.	Barratt Manchester Limited LQ Estates and Trafford HT
JPH3_JPH3.93	Much of the supply in Rochdale is already unviable it is difficult to see how affordable housing needs for all types and sizes of homes are going to be met.	Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites. Policy JP-H 2 of the plan notes that affordable housing across the plan area will be delivered via a number of mechanisms, therefore the overall ambitions in relation to affordable housing are considered deliverable.	EON Plant Ltd
JPH3_JPH3.94	In respect of a requirement for 40% of development in Bolton to form apartments, experience of viability issues in Bolton town centre would urge more cautious numbers.	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in	Greater Manchester Housing Providers

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		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	
JPH3_JPH3.95	Higher density schemes in the city centre, such as city centre towers, are often only viable through the private rented sector model which generally involves reduced affordable housing provision and that elsewhere taller buildings are often unviable even without affordable housing. With such a heavy reliance on apartments in Manchester, this raises serious questions as to the level of affordable housing that will be achieved, given these viability issues.	Matter addressed elsewhere in relation to Policy JP-H2. Please see responses to JP-H2.	Boys and Girls Club of Greater Manchester
JPH3_JPH3.96	There are significant viability issues in Bury surrounding the delivery of apartment developments, with the vast majority of the district falling within Value Areas 3, 4 and 5 within which the plan Viability Assessment demonstrates that apartment schemes are not viable, even when allowing for zero affordable housing delivery on these sites. Such viability issues are also highlighted for development typologies which include a mix of houses and apartments. Given this, the assumed residential land supply for Bury which assumes 22% of all properties to be delivered as apartments appears unrealistic and is not likely to be achieved over the plan period given the evidenced viability issues.	No changes necessary. The Strategic Housing Market Assessment [06.01.02] Chapter 5.3 provides details of the market signals with regard to land values. The Strategic Viability Assessment Stage 1 2020 [03.01.01] outlines the GMCA's position regarding viability, particularly with respect to affordable housing at Chapter 5.1 (pages 34 to 37). Affordable housing is included within the testing as the local authorities will, where it is viable, continue to seek affordable housing contributions through local plan policy and secured with s106 agreements. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites Housing Topic Paper [06.01.03] pages 54-62 set out a range of measures to support delivery, including the delivery of affordable housing, where there are viability challenges.	Hollins Strategic Land
	Targets		
JPH3_JPH3.97	GM can comfortably exceed its baseline ONS 2014 need of 131, 632 from existing projected Land Supplies with a buffer of some 46,710 based on existing land supply. GM can comfortably and with good planning expected by residents of our council employees, meet the adjusted need of 164,880 from its exiting land supply and still retain a buffer of 13,462. We are adding in	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper	Lisa Powell Robyn Powell

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	additional allocations because the local authorities can't plan properly, within their evidenced supply.	[05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	
	Other		
JPH3_JPH3.98	Type: Concern that Policy JP-H3 is in fundamental conflict with H1 and Strategic Objective. The reason for the tension is explicit in paragraph 7.30, which refers to the intention to maximise the amount of development on brownfield locations and minimise the loss of greenfield land. Whilst this is not objectionable in itself, the issue is how this is balanced with other land-use planning objectives, in addition to the question of whether the strategy will be effective under Policy JP-H1.	It is considered that policy JP-H3 is not in conflict with Policy JP-H1.	Morris Homes (North) Ltd
JPH3_JPH3.99	Concern that as drafted without reference to the historic environment the policy and the Chapter as a whole would be very incompatible with IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01]	Historic England
JPH3_JPH3.100	General Housing Chapter: The strategic sites put forward are likely to be attractive to regional and national developers, however the cost of providing significant infrastructure exclude many local and smaller regional developers.	This is not within the scope of the Plan.	See Appendix
JPH3_JPH3.101	General Housing :The associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply	Not appropriate to this policy. Matters addressed elsewhere	Save Greater Manchesters Green Belt
JPH3_JPH3.102	The PfE Plan is unsound in connection with catering for older people. The Plan is contrary to national policy by not making specific provision for older people.	No changes necessary. The ageing population will necessitate a renewed emphasis on ensuring that a diverse range of housing is available to meet the needs of older people and households. This is considered in Policy JP-H3, which states that development should seek to incorporate a range of dwelling types to meet the local needs and deliver more inclusive neighbourhoods, which, where appropriate, should include incorporating specialist housing for older households and vulnerable people.	Home Builders Federation

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JPH3_JPH3.103	Greater Manchester is a large urban conurbation yet the Places for Everyone Plan provides little focus on managing the built environment and providing a framework to ensure that new development is of a high standard, maintains local character and distinctiveness and conserves and enhances the historic environment. There is a lack of evidence to accompany the Plan on these matters which is a requirement of the NPPF.	It is considered that Policy JP-P1 Sustainable Places and Policy JP-P 2 Heritage provide an appropriate policy framework to ensure that new development is of a high standard.	Historic England
JPH3_JPH3.104	The Plan does little to recognise the importance of Greater Manchester surviving textile mills as being a key contributor in delivering homes on brownfield land.	In order to maximise the housing land supply and minimise the need for Green Belt release, each district has undertaken a search for potential housing sites from Mills identified in the Greater Manchester Mills Survey as part of the plan preparation process. Please refer to the Housing Topic Paper [06.01.03] at Chapter 6 (paragraph 3.2.2) for further details.	Historic England
JPH3_JPH3.105	Improvements to existing infrastructure (roads and transport) and facilities (GPs and dentists) are required to meet the demands of the population and are currently over-crowded/oversubscribed.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-D1, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate transport infrastructure and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Mike Bolton Louise Bolotin Samantha Dugmore
JPH3_JPH3.106	Development of this scale is not required	Comment not relevant to the content of the Homes Chapter. Matter addressed elsewhere.	Peter Stratton
JPH3_JPH3.107	Detail needed as to how this will benefit local people and allow them to buy local, and whether the properties will be for rental or for purchase	No changes necessary. Places for Everyone identifies sufficient land to meet Greater Manchester's housing need which will benefit local people.	Paul Roebuck
JPH3_JPH3.108	Detail needed to show how the plan will be developed away from green belt and utilise brownfield land, for example whether there will be removal of aged homes, such as terraced housing, which are environmentally inefficient.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas.	Paul Roebuck

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		The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The Strategic Housing Market Assessment [06.01.02] Chapter 4.4 Dwelling stock profile (Pages 86 to 100) provides a profile of the current dwellings in Greater Manchester.	
JPH3_JPH3.109	Detail needed to show how green space can be increased around existing housing - Covid and working from home saw that this space was needed for local health and well being.	No changes necessary. Policy JP-P1 Sustainable Places sets out the principles that new development should follow to create liveable and healthy communities. This includes access to green spaces (Clause 9). Chapter 8 Greener Places provides the policy framework for the protection and enhancement of the network of open spaces and other green infrastructure that are essential to contributing to the long-term attractiveness of these neighbourhoods. .	Paul Roebuck
JPH3_JPH3.110	Concerns of historic overbuilding	No changes necessary. As outlined in the Housing Topic Paper [06.01.03] at paragraph 3.8, historic under-delivery is reflected when calculating the local housing need. Only four of the nine local authorities have over-delivered against the Housing Delivery Test Measurement in 2020, with five having under-delivered.	Louise Bolotin
JPH3_JPH3.111	Concerns that there is a lack of s106 funds for reasons of viability however that this money is desperately needed for GP facilities and Dentist services.	No changes necessary. Draft Policy JP-D2 will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through the most appropriate mechanism, including, but not limited to, planning conditions, legal contracts, or CIL (or any subsequently adopted planning gain regime). For more detailed information, each boroughs Infrastructure Funding Statement provides a summary of financial contributions the Council has secured through Section 106 agreements from new development for recreation provision, affordable housing, off-site infrastructure works and highway works over the previous 12 months and will be updated annually.	Louise Bolotin Samantha Dugmore
JPH3_JPH3.112	The Duty to Cooperate specifies building on brownfield rather than Green Belt	Not relevant to this Policy. Comment addressed elsewhere.	Paul Gilbert
JPH3_JPH3.113	Opposition to proposals to build on Green Belt, opposing the original function of Green Belt to prevent urban sprawl.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to	Paul Gilbert Steven Brown

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		meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Tina Brown Joanne Koffman MiriamLatham
JPH3_JPH3.114	Concern that Green Spaces and Green Belt will be destroyed.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . Policy JP-P1 Sustainable Places also sets out the principles that new development should follow to create liveable and healthy communities. This includes access to green spaces (Clause 9).	Samantha Dugmore Kim Scragg Jenny Lindoe
JPH3_JPH3.115	Concern that there is no legal requirement for developers to build in line with the policy and it is likely that the policy will be disregarded in preference to larger, more expensive and less eco friendly housing	Locally appropriate requirements will be set by each local authority through their Local Plans however upon adoption, the PfE will form part of the 9 local authorities Development Plan. Planning applications are required by the National Planning Policy Framework (NPPF) to be in accordance with an adopted Development Plan .	Julie Halliwell
JPH3_JPH3.116	JPA 26 Hazelhurst: Proposed houses are too close to the existing properties so will negatively impact the existing residents.	These issues will be considered through the masterplanning process as required by criterion 1 of the site allocation topic paper and any subsequent planning application(s).	Jenny Lindoe

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JPH3_JPH3.117	Build on brownfield land first to regenerate.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Jenny Lindoe Miriam Latham
JPH3_JPH3.118	If PfE is not efficient in its use of existing land resources, especially those that directly support the spatial strategy, then that will lead to it failing to fully capitalize on economic assets and its sustainable transport infrastructure. If this is the case then the strategic objectives of the plan are compromised.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . Policy H3 and H4 seek to deliver a mix of housing across a range of locations, and Policy H4 is considered to have positive impacts in relation to land resources, because it focuses higher density development near to public transport and town centres, which will reduce the amount of greenfield/Green Belt needed. As such, the policies meet the strategic objectives of the plan and the PfE is efficient in its use of land resources in the spatial strategy.	Save Greater Manchester's Green Belt
JPH3_JPH3.119	All brownfield registers should be brought up to date.	No changes necessary. Local planning authorities are required to review their registers at least once a year. Reviews will ensure that sites which no longer meet the criteria for inclusion are removed and new sites are assessed and entered if it is appropriate to do so.	Save Greater Manchester's Green Belt

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JPH3_JPH3.120	The PfE is substantially and significantly different from the GMSF and therefore cannot be treated as the same plan.	No changes necessary. Comment not relevant to the content of the Homes chapter. Matter addressed elsewhere.	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.121	The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.	No changes necessary. As detailed in the Housing Topic Paper [06.01.03] at Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need. Furthermore, 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] .	Richborough Estates SUSAN DENNETT Lisa Powell Robyn Powell Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.122	More detail required into how infrastructure will be funded	Draft Policy JP-D2 will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through the most appropriate mechanism, including, but not limited to, planning conditions, legal contracts, or CIL (or any subsequently adopted planning gain regime). Draft Policy JP-D1 Infrastructure implementation outlines that we will “Establish a new long-term funding mechanism for transport and site specific infrastructure to ensure timely delivery and capture of developer contributions,” and “Require applicants to prepare an infrastructure phasing and delivery strategy for strategic sites, and major sites where build out will be delivered by different developers or in	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham

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		<p>phases. This strategy must outline what needs to be provided by when and who will fund and deliver it”.</p> <p>Site Allocation policies set out the detailed infrastructure requirements of each site and these have been subject to a viability assessment. Details of this is set out in the allocation topic papers.</p>	
JPH3_JPH3.123	There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.	No changes necessary. It is too early in the process to identify businesses to occupy proposed employment provision.	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.124	There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness.	Comment not relevant to the content of the Homes chapter. Matter addressed elsewhere.	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.125	The site selection process has been unclear and should be repeated using National and GMCA guidelines for site selection	No changes necessary. The Site Selection Background Paper [03.04.01] details the methodology and rationale used to identify potential sites for allocation. Appendix 7 [03.04.09] provides a summary of the assessment of those sites within Areas of Search which were considered less suitable for allocation, but which represented “reasonable alternatives” for the allocation boundaries.	SUSAN DENNETT C Smith Juliet Eastham
JPH3_JPH3.126	Clear delivery plans for infrastructure should be included.	Draft Policy JP-D2 will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. These will be secured through the most appropriate mechanism, including, but not limited to, planning conditions, legal contracts, or CIL (or any subsequently adopted planning gain regime). Draft Policy JP-D1 Infrastructure implementation outlines that we will “Establish a new long-term funding mechanism for transport and site specific infrastructure to ensure timely delivery and capture of developer contributions,” and “Require applicants to prepare an infrastructure phasing and delivery strategy for strategic sites, and major sites where build out will be delivered by different developers or in	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham

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		<p>phases. This strategy must outline what needs to be provided by when and who will fund and deliver it”.</p> <p>Site Allocation policies set out the detailed infrastructure requirements of each site and these have been subject to a viability assessment. Details of this is set out in the allocation topic papers.</p>	
JPH3_JPH3.127	There is no proof of exceptional circumstances to release and redefine Green Belt areas.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	SUSAN DENNETT Lisa Powell Robyn Powell Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.128	In addition to PfE each authority needs to come up with its own local plan. No details have been given about when these plans will be available.	Each Local Authority has a publicly available Local Development Scheme (LDS) which provides a timetable and management plan for the preparation of local planning policy documents such a Local Plan.	SUSAN DENNETT C Smith Juliet Eastham
JPH3_JPH3.129	There are no details of how Duty to Cooperate will be achieved.	Comment not relevant to the content of the Chapter 7. Matter addressed elsewhere.	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.130	A 35% uplift for the Manchester City Council area represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.	Comment not relevant to the content of the Chapter 7. Matter addressed elsewhere	SUSAN DENNETT Matthew Oxley C Smith Juliet Eastham
JPH3_JPH3.131	The release of green belt and open land in peripheral areas, poorly served by public transport will not meet the needs of many groups	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to	Gillian Boyle

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	referred to in the policy. Requests for the removal of the allocations on green belt and open land and more focus on the design of new housing wherever it is located	meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	
JPH3_JPH3.132	There is an imbalance between groups of people across the country and planning permission is being given for huge dwellings for a single family unit which is unfair.	No changes necessary. The Housing Topic Paper [06.01.03] considers the risk of inequalities in Greater Manchester at paragraph 6.24.	Maureen Buttle
JPH3_JPH3.133	Concern over use of wording 'Should' rather than 'Must'.	Amendments to the wording are not considered necessary.	Laura Charlotte
JPH3_JPH3.134	Houses should be future proofed for climate change, heating, rain water collection, solar energy.	No changes necessary. Policy JP-S 2 Carbon and Energy sets the expectation that new development will be net zero carbon from 2028 with an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations.	Alison Doherty
JPH3_JPH3.135	Questions how building new development on Green Belt and green fields instead of regenerating/redeveloping Brownfield land and losing part of our natural environment will make things better for future generations.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . For further information, please refer to the Integrated Assessment of the Places for Everyone Plan [02.01.05] which considers the impact of the policies and potential changes. It concludes that no amendments have been made to the policy wording in relation to contribution to or enable brownfield land development and	JanineLawford

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		minimise the loss of greenfield sites as this is addressed by Policy GM-P 1 which covers sustainable development (Objective 17)	
JPH3_JPH3.136	The sites have an abundance of wildlife which is being negatively impacted by loss of habitat and busier roads.	Please refer to responses to Chapter 8 Greener Places, specifically Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity which seeks a net enhancement of biodiversity resources. Allocation Topic Papers set out how these issues are addressed on a site by site basis.	Miriam Latham
JPH3_JPH3.137	Do not need more housing, already oversubscribed.	No changes necessary. Chapter 3 of the Strategic Housing Market Assessment [06.01.02] confirms that under the current methodology the overall annual housing need for Greater Manchester is 10,305 homes per annum.	Debra O'Brien
JPH3_JPH3.138	The figures used to calculate housing need are over estimates. All housing need could be developed on brownfield land.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Bernie Burns
JPH3_JPH3.139	We should not be developing green space if this can be avoided for reasons of climate change. These developments will increase CO2 release, with increased traffic and industry. It is unsustainable.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green	Bernie Burns

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Belt Topic Paper [07.01.25] For further information, please refer to the Integrated Assessment of the Places for Everyone Plan [02.01.05] which considers the impact of the policies in the Plan.	
JPH3_JPH3.140	Local green spaces are essential to health and wellbeing, this has been demonstrated over the last 18 months	No changes necessary. Policy JP-P1 Sustainable Places sets out the principles that new development should follow to create liveable and healthy communities. This includes access to green spaces (Clause 9). Chapter 8 Greener Places provides the policy framework for the protection and enhancement of the network of open spaces and other green infrastructure that are essential to contributing to the long-term attractiveness of these neighbourhoods	Bernie Burns
JPH3_JPH3.141	The government figures for the housing required in Greater Manchester need to be challenged in light of the turbulence of the last few years - Brexit/Covid being the two main issues.	Matter dealt with in response to Policy JP-H1.	Bernie Burns
JPH3_JPH3.142	The proposal is unsustainable, will cause air pollution, increased risk of flooding, loss of biodiversity, loss of green space, non affordable or eco homes, habitat loss and lack of infrastructure.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] For further information, please refer to the Integrated Assessment of the Places for Everyone Plan [02.01.05] which considers the impact of the policies in the Plan.	Vicky Harper
JPH3_JPH3.143	It is vital to have coordinated plans that make best use of land and in particular brown field sites close to public transport corridors - supported by walking and cycling. In turn these routes need to avoid congested road corridors - with their atmospheric and particulate pollution (already beyond safe levels in many parts of Gtr Manchester).	No changes necessary. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport	Roy Chapman

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		<p>Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026.</p> <p>Recent delivery rates and the identified land supply, demonstrate that the relevant targets within this area are deliverable. The Site Selection Background Paper [03.04.01] details the methodology used to identify potential sites for allocation and the site selection criteria in more detail.</p>	
JPH3_JPH3.144	<p>There is too much encroachment on open spaces and Green Belt. The UK has one of the lowest percentages tree cover in Europe and many of our towns and cities are already too congested with housing - made worse by the lack of adequate resources (shops, schools, health care etc.). Allied to this there is a grossly inadequate use of brownfield sites and repurposing of excellent older buildings of real quality. The tax system actually incentivises the demolition and replacement of older buildings - Gtr Manchester is hamstrung by national planning and laws and tax arrangements.</p>	<p>No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p>	Roy Chapman
JPH3_JPH3.145	<p>The misguided 'Right to Buy' policy means that too many Council houses have been sold too cheaply and have not been replaced. The Right to Buy policy must be scrapped. If it remains at the very least the discount given to Council tenants buying their home must not exceed 15%. Councils will then obtain money in excess of the cost of building replacements.</p>	<p>No changes necessary. The Right to Buy Scheme is a national policy under the jurisdiction of the Department for Levelling Up, Housing and Communities not the GMCA.</p>	Roy Chapman
JPH3_JPH3.146	<p>The assessment criteria used in determining the suitability of land parcels is flawed as its contention has been how can we include the strategic parcels as opposed to why they should be retained as serving green-belt purposes under NPPF</p>	<p>Comment not relevant to the Homes chapter, the matter is addressed elsewhere. It is considered that the assessment criteria are suitable, please refer to The Green Belt Assessment [07.01.04] for further clarity regarding the methodology used.</p>	Lisa Powell Robyn Powell
JPH3_JPH3.147	<p>The plan is not evidence based as required by para 31 of the NPPF "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." As the 2014 ONS figures are not up-to-date.</p>	<p>No changes necessary. As detailed in Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We</p>	Lisa Powell Robyn Powell

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	
JPH3_JPH3.148	The plan is not justified against GMCA's Site Selection criteria [03.04.01 Site Selection Background Paper], where it states "Where a single district has sufficient land supply to meet its own LHN and this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt" – Noting that this criterion seems to have applied to none of the districts in GMCA, Wigan can more than meet its LHN from existing SHLAA Land Supply inclusive of growth targets.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to, as a core principle, boost the competitiveness of the Northern Areas such as Wigan. Please refer to Policy JP-Strat 6 Northern Areas for further details regarding this aspect of the strategy. It is considered that a proportionate evidence base has been provided to support the strategy, such as the approach to growth and spatial distribution which is set out in the Growth and Spatial Options Paper [02.01.10] and the approach to the site selection can be found in the Site Selection Background Paper [03.04.01].	Lisa Powell Robyn Powell
JPH3_JPH3.149	There is no evidence from the GMCA to support the PfE's supposition that an elderly couple would be willing and choose to leave their large family home and move to a 1 or 2 bed apartment in a high-rise tower block as their care needs increase.	No changes necessary. As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Story Homes Limited
JPH3_JPH3.150	Concern regarding the preference to be given to using previously developed (brownfield) land to meet development needs and the implications this has for viability to provide affordable housing and other planning contributions.	No changes necessary. Not all sites will be brought forward as private market housing and the districts have been successful in securing funding to bring forward this type of development in some of the more challenging areas and the districts will continue to work proactively with multiple organisations to bring forward more challenging sites. This matter is addressed elsewhere in more detail as it concerns Policy JP-H2.	Landowners of Holme Valley CCW&G J and B Fitton Bowden Rugby Club Miri Roshni W R Halman C L Halman F I Carless

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
			J M Gibney
JPH3_JPH3.151	No assessment of the actual need for each authority has been provided in the SHMA. It is therefore unclear how the PfE supply will be capable of meeting the unique demands of each individual authority.	No changes necessary. Local Housing Need is assessed in Chapter 3 of the Strategic Housing Market Assessment [06.01.02]. The Local Housing Need split by local authority is included within Table 3.3. However, as confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Hollins Strategic Land Hollins Strategic Land
JPH3_JPH3.152	Should acknowledge the need to reflect relevant housing market demand and site-specific constraints/opportunities	No changes necessary. The Policy does acknowledge site specific constraints. The Housing Topic Paper [06.01.03] considers the existing evidence with regard to market demand at Chapter 3. Site specific requirements, opportunities and issues are set out in the individual site allocation topic papers.	Prospect GB and Dobinetts Regeneration
JPH3_JPH3.153	Appears to be a contradiction between the sites allocations and locations and the balance of typologies in table 7.3.	No changes necessary. The land supply tabulation is set out in Table 6.4 of Housing Topic Paper [06.01.03] and is based on the 2020-2037 housing land supply (which was the latest data available at the time of plan preparation) combined with the supply on PfE site allocations	Greater Manchester Housing Providers
JPH3_JPH3.154	Point 1 should be amended be removed in the absence of any underpinning evidence to ensure that the policy is justified and consistent with national policy.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03]	GLP Trows LLP and BDW Trading Limited
JPH3_JPH3.155	Scenario 3 in the SHMA has no merit; London's housing supply fails to meet its own need in terms of housing type and affordability and should be what GM is trying to avoid. If scenario 3 is discounted then the highest percentage of apartments that could be provided is 30%.	No changes necessary. Given the diversity of our population and households, we have considered a number of scenarios in the Strategic Housing Market Assessment [06.01.02] to ensure that we are planning to build the right mix of type and size of housing to cater to our residents and make sure we are attractive to potential new residents over the next 20 years.	HIMOR Group Hollins Strategic Land Hollins Strategic Land
JPH3_JPH3.156	No assessment of how the high proportion of apartments in Manchester and Salford will impact demand in other districts	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H3, it can be found here: Housing Topic Paper [06.01.03] .	HIMOR Group Hollins Strategic Land Hollins Strategic Land

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPH3_JPH3.157	The SHMA fails to recognise that the demographic position on household composition is only one element of the equation. Households will continue to aspire to acquire housing which may not technically be needed to meet their needs. For example, a household of 2 parents and 2 children may demographically require a 3-bedroom house, but they may well aspire to (or need) a 4-bedroom house. They may also need a bedroom for a home office or as a guest room for elderly relatives.	As recognised in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88), some single and couple households will want or need to live in larger dwellings, for example to facilitate home-working or accommodate visiting relatives, however a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations. As set out in Policy JP-H3, the precise mix and type of homes will be determined at the local level, taking into account local circumstances.	Hollins Strategic Land
JPH3_JPH3.158	Maximising the development of brownfield land and minimising the loss of Green Belt is a strategy which is being pursued at the expense of providing a mix of housing which actually responds to evidenced demand.	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] . As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 in order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. This responds to the demands as smaller households are forecast to account for over half of the growth in households. It is anticipated that this will further strengthen the demand in apartments, particularly given cost pressures and the increased reliance on private rented accommodation.	Hollins Strategic Land Hollins Strategic Land Taylor Wimpey
JPH3_JPH3.159	Support: Policy is entirely consistent with the SRF for Wythenshawe Hospital and the introduction of key worker, step down care and potentially other forms of housing provision that will support a sustainable housing offer, meeting local needs	Support Noted	Manchester University Hospitals NHS Foundation Trust
JPH3_JPH3.160	Policy unsound / not legally compliant (no further details given).	No change is considered necessary. Policy JP-H3 is considered to be consistent with the NPPF and provides an appropriate strategy for the density of new housing which is a key objective of the plan and NPPF.	See Appendix

Policy JP-H 4 Density of New Housing

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Density		
JPH4_JPH4.1	Support the inclusion of criterion 1 on policy JP-H4 (Density of New Housing) to ensure that densities can reflect local housing market issues. This policy is clearly consistent with national policy which seeks to ensure efficient use of land.	Support Noted.	Bowdon Rugby Club Miri Roshni W R Halman C L Halman F I Carless J M Gibney Bluemantle CCW&G J and B Fitton
JPH4_JPH4.2	Concerned that there is scope for lower densities to be accepted and the wording of the policy should be amended so that it does not lead to low density developments in central locations	No changes necessary. The PfE seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. The density ratios proposed in the PfE are considered to be realistic however offer sufficient flexibility where a lower density can be justified in line with the criteria.	CPRE
JPH4_JPH4.3	Concerned that the policy might lead to over development in some areas. Suggest that table needs to be expanded and accompanied by a map for each LA	No changes necessary. The PfE seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. The table provided in Policy H4 is considered to be sufficient to clarify the acceptable densities within designated centres and near public transport.	CPRE
JPH4_JPH4.4	Support the need for the acceptance of lower densities where they can be clearly justified such as local housing market issues, demonstrable need for a particular type of housing or site-specific issues relating to design context, landscape or heritage issues, etc.	No changes necessary. The PfE seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. The density ratios proposed in the PfE are considered to be realistic however offer sufficient flexibility where a lower density can be justified in line with the criteria.	Highgrove Strategic Land Rowland Homes Ltd PD Northern Steels Peter and Diane Martin
JPH4_JPH4.5	Consider there is a need for greater clarity in relation to the density ranges in the final paragraph of the policy relating to scheme where there is a mix of houses and apartments having a desired density of 70-120 dwellings. Policy JP-H 3 confirms that developments across the city should seek to	No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible.. The	Highgrove Strategic Land Rowland Homes Ltd PD Northern Steels Peter and Diane Martin

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>provide a range of dwelling types and on larger greenfield sites, we anticipate local authorities will call for a mix of homes including some apartments, particularly to meet either affordable or elderly accommodation needs as part of a wider family housing mix. We are not convinced such schemes would deliver this density range and is still more likely to be within the 35-70 density range.</p>	<p>density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas.</p>	
JPH4_JPH4.6	<p>The identification of a minimum net residential density figure of 35 dwellings per hectare for 'all other locations' is unsound, too high, and is heavily skewed towards the delivery of apartments in city and town centres the Plan does not adequately plan for delivering a mix of different housing types, sizes and densities. Claims that the proposed densities would result in a mix of dwellings which would not meet all identified needs, in particular, provision in family and executive housing, and could lead to a proliferation of higher density apartments and small dwellings, in conflict with paragraphs 11, 60, 61 and 62 of the NPPF. It is thought that this density will be undeliverable whilst also delivering high quality developments which meet other aspects of the draft plan such as maximising opportunities to enhance existing biodiversity and delivering quality new green infrastructure. Requests for greater flexibility to be incorporated into the policy to cater for exceptional development and family homes to allow a range of sites in more suburban areas to come forward.</p>	<p>No changes necessary. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas however offer sufficient flexibility where a lower density can be justified in line with the criteria. Housing Topic Paper [06.01.03] at page 34.</p>	See Appendix
JPH4_JPH4.7	<p>Does not oppose the setting of density requirements for new development in the context of the aspiration to make efficient use of land, subject to sufficient safeguards for site-specific flexibility. A density of 35 dwellings per hectare (dph) in “all other locations” is considered to be broadly appropriate</p>	Support noted.	Peel L&P Investments (North) Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPH4_JPH4.8	The clarification that lower densities will only be acceptable where they would not "...compromise the overall delivery of new homes..." is unacceptable.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria.	Peel L&P Investments (North) Ltd
JPH4_JPH4.9	National Planning Policy also promotes higher densities at key transport nodes and centres. Therefore recommends further flexibility is required in Policy JP-H 4 in relation to density levels. In particular a density of 35dph within 800m of a designated centre is considered to be too low.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where lower density can be justified in line with the criteria. In reference to the particular density of 35dph within 800m of a designated centre, the Policy wording is clear that this is a minimum density, not a maximum.	Royal London Asset Management
JPH4_JPH4.10	Supportive of the principle as a positive step to recognise the full potential at Davenport Green however request some flexibility in the policy to allow for higher densities to be achieved and to go beyond the identified distance thresholds where justified by other considerations such as existing field boundaries or infrastructure.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. In reference to higher densities, the Policy wording is clear that this is a minimum density, not a maximum. As such, it is considered that sufficient flexibility has been incorporated into the policy.	Royal London Asset Management
JPH4_JPH4.11	The density of new housing must align with the identified needs at the time an application is being considered as market conditions should drive the mix, not a specific density outlined in policy	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria	Redrow Homes Trafford
JPH4_JPH4.12	We would encourage the Mayor to desist from stipulating minimum densities. This has proved to be ineffective in Greater London over the last fifteen years culminating in the Mayor of London abandoning the density matrix for the latest version of the London Plan (2021). The reason being that housebuilders always met or exceeded the minimum densities stipulated, but the density matrix became an instrument used by opponents to resist denser developments. In truth, developers will build as densely as is necessary for reasons of viability, with this tempered to a degree by aesthetic considerations plus the practical needs of purchasers / residents (garden space, car parking etc).	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility. This is a plan of the 9 GM districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) and the Mayor has no legal role in its preparation	HOME BUILDERS FEDERATION
JPH4_JPH4.13	Concerned that the Policy is overly prescriptive and will not meet the needs of the markets it is intended to serve. The	We have published a comprehensive land supply position statement within the Housing Topic Paper [06.01.03] . In compiling this districts have considered the	Taylor Wimpey

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	advantages of setting minimum density requirements to achieving the delivery of sites on existing brownfield sites within the urban area are recognised. However, the PfE has little regard to site specific constraints such as flood risk, topography, ecology etc. which can reduce the net developable area of a site; nor does it have regard to the financial viability of delivering these (often complex) brownfield sites	requirements of the density policy alongside other factors in assessing the availability and deliverability of sites to be included within the SHLAA. Achieving the densities may not always be possible (where sites have planning permission for example) and lower densities may be acceptable where they can be justified. Therefore, the density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria and no changes are considered to be necessary.	
JPH4_JPH4.14	An over-reliance on high density dwellings (particularly apartments) may increase overall housing numbers, but in practice it will deter families and executives from locating in the area. This in turn will hamper the ability of Manchester to deliver its economic growth objectives and will, at the very best, significantly increase commuting levels and congestion.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. Part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] and details of the housing land supply can be found in the Housing Topic Paper 06.01.03 .	Taylor Wimpey
JPH4_JPH4.15	The density policy should be flexible enough to allow proposals that are responsive to site specific circumstances.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria.	See Appendix
JPH4_JPH4.16	The starting point should be the identified need for different types of housing, rather than the availability of land. Impression that density is regarded as an end in itself.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the	Morris Homes (North) Ltd Persimmon Homes North West

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]	
JPH4_JPH4.17	Support the concept that new housing development should be at a density appropriate to the location and reflecting the degree of accessibility by walking, cycling and public transport. However the approach is too prescriptive.	No changes necessary. It is considered that the approach taken is sufficiently detailed and flexible to guide new development.	Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.18	No indication of how the proposed densities have been arrived at (for example should not automatically assume all areas within 400m of metrolink / train station are suitable for 70dph).	No changes necessary. A key role of this Plan is to manage the conflicting demands on our finite land resources. Securing higher densities in the most accessible locations will help to maximise the ability of people to travel by walking, cycling and public transport, and reduce reliance on the car.	Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.19	Increasing the average density in the most accessible locations is an important part of the strategy - it will reduce amount of land needed for development, assisting in protecting greenfield and Green Belt, will help minimise need to travel, giving access to local shops of services, increasing local population to support local facilities and regeneration, and help increase sustainable travel.	Support noted.	Jennifer Simm
JPH4_JPH4.20	The density of housing could be increased to reduce the amount of Green Belt taken up. Town centre car parks and areas that might flood could be built on with apartments over parking at the lower level.	No changes necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Christopher Russell
	Mix, Size, Type and Design		
JPH4_JPH4.21	We note that Part A does state that for schemes that are primarily houses the lower 35-70 dph density will apply but it we consider it would be more appropriate to add the words 'a broadly equal mix of houses and apartments' to part B to	Please see Row JPH4_JPH4.5.	Highgrove Strategic Land Rowland Homes Ltd PD Northern Steels Peter and Diane Martin

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	ensure the suggested target of 70-120 dwellings is more achievable.		
JPH4_JPH4.22	It does not take into account that many families want to live in larger suburban family homes with private outdoor amenity space particularly post Covid with access to schools, play space and other services and facilities. Higher density development also reduces the opportunities for placemaking and creating communities in which people aspire to live. The PfE needs to consider placemaking as a fundamental part of its strategy rather than releasing the least amount of land and delivering high density developments which have poor urban realms and insufficient open space and facilities.	No changes necessary. The Plan seeks to make efficient use of land and part of this strategy is building homes at high density, particularly within the Core Growth Area. The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper 06.01.03 With regard to placemaking, Policy JP-P 1 Sustainable Places considers placemaking and communities. It outlines several key attributes that all development, will be required to be consistent with in order to create one of the most liveable city regions, consisting of a series of beautiful, healthy and varied places. Furthermore, the density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. As such, it is considered that sufficient flexibility, to take into account of site-specific circumstances, has been incorporated into the policy. It is also considered that a proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] .	Taylor Wimpey Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.23	Space standards are less likely to be achieved within the parameters of the density policy.	No changes necessary. Document 03.01.01 Places for Everyone Strategic Viability Assessment Stage 1 2020 confirms at paragraph 4.2.7 that an alternative approach to calculating residential land values which ensures that the value estimates used for the study reflect actual market behaviour has been utilised to avoid any issues (sometimes expressed by the development industry around price points) when using the Nationally Defined Space Standards to derive an average house size.	Kellen Home
JPH4_JPH4.24	Designation of minimum density standards is likely to result in even smaller and less attractive housing and lead to uniformity and lack of choice. Will result in lack of housing for families requiring larger houses with gardens, and new areas will become dominated by younger (and more transient groups), the elderly and poorer families in less spacious and less attractive housing.	No changes necessary. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. With regard to delivering the right mix of dwellings, Policy JP-H3 confirms that all new dwellings must comply with the nationally described space standards and that the precise	Gillian Boyle

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		mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	
JPH4_JPH4.25	Abandon minimum densities and develop policies that pay more regard to local housing needs, need to provide balance in the housing market and a mix of house types.	Please see Row JPH4_JPH4.6.	Gillian Boyle
JPH4_JPH4.26	The houses being built are detached or semi-detached so the plan is flawed.	No changes necessary. Policy JP-H3 confirms that the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole.	Glenn Dillon
JPH4_JPH4.27	The houses are too close together and don't usually include good soundproofing between shared walls.	No changes necessary. A key aim of this Plan is to boost the supply of well designed new homes however, the distance between homes is dealt with at the planning application stage rather than at a strategic plan level and Policy JP-H3 confirms our position with regard to the Type, Size and Design of New Housing.	Joanna Harland
JPH4_JPH4.28	Unclear how the density calculations interact with the provision of affordable housing, which is more likely to be at a higher density than more expensive properties. More detail should be provided on how affordable housing will be allocated in the designated centres and transport stops.	No changes necessary. All dwellings, including affordable housing, will be required to be at a density in line with Policy JP-H4. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. In order to deliver the necessary densities, an increasing proportion of new dwellings will be in the form of apartments and town houses, continuing recent trends. The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas.	Stephen Hopkins
JPH4_JPH4.29	New houses are often too small, with overcrowding leading to social and mental health issues.	Policy JP-H3 seeks to require all new dwellings to comply with the nationally described space standards. Please see the responses to Policy JP-H3 for further information.	Martha Hughes
	Brownfield		
JPH4_JPH4.30	Supports the use of a density policy, making efficient use of land and making as much use as possible of brownfield land. However, they do consider that it is important to ensure that the prioritisation of higher density development and the use of brownfield land does not compromise the	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks	Rowland Homes Ltd Miller Homes Barratt Manchester Ltd EON Plant Ltd LQ Estates & Trafford HT

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	delivery of homes in sustainable locations to meet local needs for instance those requiring lower density, family homes. However, with the heavy reliance on brownfield land and higher densities, there may simply not be enough sites available that are suitable for lower densities.	to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . The density ratios proposed in the PfE are considered to be realistic based on the land supply within these urban areas however offer sufficient flexibility where a lower density can be justified in line with the criteria.	Seddon Homes Ltd
JPH4_JPH4.31	Support the use of a density policy but points out that the prioritisation of brownfield land should be not at the disadvantage of sustainable greenfield sites that can deliver family housing.	No changes necessary. In line with NPPF, the PfE seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. As made clear in the Housing Topic Paper [06.01.03] at Chapter 6 (Paragraph 6.87-6.88) a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. It is considered that the land supply identified in the Housing Topic Paper (reference) is sufficient to provide an appropriate mix and type of housing to meet identified needs.	Seddon Homes Ltd
	Housing allocations		
JPH4_JPH4.32	More land/specific site is requested to be allocated so that a wide range of family housing can be provided.	No changes necessary. It is considered that Places for Everyone identifies sufficient land to meet Greater Manchester's housing need.	Seddon Homes Ltd Seddon Homes Ltd GLP Ltd Seddon Homes Ltd
JPH4_JPH4.33	Reference within this policy should also refer to densities specific to allocations (e.g. JPA 33 – New Carrington and JPA 27 East of Boothstown) as at present there is conflict between the density figures presented across the plan which is inconsistent	The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria. No changes necessary. The allocated sites are supported by an appropriate evidence base and where relevant, site specific densities are referred to within the allocation policies. It is not considered that there is conflict between JP-H4 and specific allocation policies	Peel L&P Investments (North) Ltd Redrow Homes Trafford
JPH4_JPH4.34	Concerned by the lack of evidence relating to the commitment to housing densities and believe this Policy is not currently Effective. More information is needed about specific definitions of density and how this will be delivered on each site and in each Allocation. Without this evidence it	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] . Where relevant, site specific densities are referred to within the allocation policies however we do not consider there to be a need to refer to each allocation in this	Friends of Carrington Moss

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	is impossible to determine whether this Policy can be delivered. There is also no detail about what happens if a proposal is presented that does not meet the density requirements (including the acceptable lower density tests set out in the Policy, page 141).	overarching policy. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria.	
	Viability / Delivery		
JPH4_JPH4.35	Significant uncertainty over deliverability of some town centre sites, viability assessment finds that only 68% of SHLAA supply is viable. Subsequent concern that delivering sites at high densities within the urban areas is being proposed to minimise Green Belt release, at the expense of all other sustainability considerations such as the delivery of affordable housing and other infrastructure.	No changes necessary. Places for Everyone sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (Policy JP-S1). As such, in light of some of the viability challenges identified in low value areas through the Viability Appraisal [03.01.01] of the PfE and subsequent addendum [03.01.02] , and the high proportion of brownfield sites, it was considered appropriate to incorporate a slightly larger flexibility allowance of 15% across the plan area.	HIMOR Group Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd
JPH4_JPH4.36	It is clear that it would be premature to release any green belt in advance of the Plan demonstrating that its density specifications are deliverable.	No changes necessary. We have published a comprehensive land supply position statement within the Housing Topic Paper [06.01.03] . In compiling this districts have considered the requirements of the density policy alongside other factors in assessing the availability and deliverability of sites to be included within the SHLAA. Achieving the densities may not always be possible (where sites have planning permission for example) and lower densities may be acceptable where they can be justified. Furthermore, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	Friends of Carrington Moss
JPH4_JPH4.37	The density ranges quoted in the policy are considered to be unrealistic and have the potential to hamper the delivery of a varied mix in the supply of dwellings. The plan or its associated evidence base provides no justification that the proposed densities are deliverable across the city region or demonstrate how housing units in particular could be	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and broadly consistent with the existing land supply, whilst offering sufficient flexibility where a lower density can be justified in line with the criteria. As such, it is considered that sufficient flexibility, to take into account of site-specific constraints, has been incorporated into the policy. It is also considered that a	Taylor Wimpey

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	delivered. The Policy sets a range of 35-70 dwelling per hectare on site of primarily houses. Taylor Wimpey has considerable experience of delivering homes across Greater Manchester and is aware of very few instances where densities of 70 dwellings have been achieved as primarily homes. The lower end of the range is achievable but when one considers place making, delivery of residential development of predominantly houses, the delivery of significantly more than 35 dwellings per hectare is not realistic or achievable.	proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] .	
JPH4_JPH4.38	Policy purports to provide some flexibility but then immediately negates this by adding "where it would not compromise the overall delivery of new homes in the district", creating an expectation that unviable developments which would harm townscape including heritage and Green Infrastructure should be relied upon to achieve housing numbers.	No changes necessary. The policy is considered to provide sufficient flexibility, and policies such as Policy JP-P 2 Heritage and Policy JP-Strat 13 Strategic Green Infrastructure are considered sufficient to protect these aspects of the townscape from harm.	Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.39	Support the identification of higher density near transport nodes and in more sustainable locations. However, it is imperative that the other policies in the plan allow for the densities identified to be achieved. e.g. NDSS, M4(2) and M4(3) accessibility standards, integration of SuDs will make dwellings larger and reduce net density.	No changes necessary. It is considered that the requirements of Policy JP-H3 work with Policy JP-H4 toward the aims of the PfE and the Greater Manchester Housing Strategy.	Kellen Home
JPH4_JPH4.40	The minimum density specifications are not being fully delivered and the absence of up to date brownfield registers make it difficult to determine whether sites satisfy the criteria of the minimum density specification, and if the prescribed minimum density will be delivered. SHLAAs should clearly indicate whether the prescribed densities are being achieved on individual sites, and the average densities achieved across the density categories.	No changes necessary. It is considered that Places for Everyone identifies sufficient land to meet Greater Manchester's housing need. We have published a comprehensive land supply position statement within the Housing Topic Paper [06.01.03] . In compiling this districts have considered the requirements of the density policy alongside other factors in assessing the availability and deliverability of sites to be included within the SHLAA. Achieving the densities may not always be possible (where sites have planning permission for example) and lower densities may be acceptable where they can be justified. Therefore, the density ratios proposed in the PfE are considered to be realistic based on the land supply	Save Royton's Greenbelt Community Group Save Greater Manchester's Green Belt

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		within these urban areas and a proportionate evidence base has been provided to support the policy.	
	Definition/clarity		
JPH4_JPH4.41	Whilst we note that the centre boundaries will be defined in Local Plans, we consider this policy should provide a clear cross reference to what is meant by large designated centres. Presuming this means the largest towns associated with their respective authorities (i.e. Altrincham, Wigan, Oldham, Rochdale, etc), we consider the density is broadly justified but confirmation is sought.	No changes necessary. As made clear within Policy JP-H4, the designated centres are as defined in district local plans.	Highgrove Strategic Land Rowland Homes Ltd PD Northern Steels Peter and Diane Martin
JPH4_JPH4.42	Rigid categorization of centres and straight line distances from boundaries, but there is no uniformity in how the districts currently designate centres, which will continue to be defined by local plans.	No changes necessary. As made clear within Policy JP-H4, the designated centres are as defined in district local plans. Definitions and further details for interpretation are provided within the policy to ensure the consistent application of the policy.	Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.43	GMAL score data is not accessible to anybody without the technical skills to interpret the data.	No changes necessary. GMAL score data is mapped and accessible at the Greater Manchester Open Data Infrastructure Map (GMODIN) [link: MappingGM.org.uk/gmodin]. The data is mapped across the entire Greater Manchester Area so minimal technical skills are required to view and interpret the data. Whilst it is considered that amended wording could improve the clarity of Footnote 85, it is not considered to be a soundness issue, therefore no change is proposed.	Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.44	It is not clear from the policy which towns qualify as town centres, large designated centres and other designated centres. The town boundaries are also difficult to discern making it next to impossible to determine which existing sites qualify for the higher densities.	No changes necessary. As made clear within Policy JP-H4, the designated centres are as defined in district local plans.	Save Royton's Greenbelt Community Group
JPH4_JPH4.45	Precise definitions of the different areas should be provided and all the centres they apply to should be clearly identified.	No changes necessary. As made clear within Policy JP-H4, the designated centres are as defined in district local plans.	Save Royton's Greenbelt Community Group Save Greater Manchester's Green Belt
	Open Space		

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JPH4_JPH4.46	Open space provision should not be compromised in order to achieve higher densities.	No changes necessary. Paragraph 7.33 of the Plan acknowledges the importance of outdoor amenity space in delivering high quality homes, and Policy JP-P1 Sustainable Places considers placemaking and communities. It addresses green/open spaces as a key attribute that all development, where appropriate, will be required to be consistent with in order to create one of the most liveable city regions at point 16. Policy JP-G6 Urban Green Space recognises the role of accessible urban green space in supporting a high quality of life.	Martha Hughes Simon Robertson David Hawes
JPH4_JPH4.47	Concern about loss of open spaces that are well used by local communities. Green space around existing communities should be increased - this is even more important with home working.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land and limit the extent of Green Belt release. 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. Paragraph 7.33 of the Plan acknowledges the importance of outdoor amenity space in delivering high quality homes, and Policy JP-P1 Sustainable Places considers placemaking and communities. It addresses green/open spaces as a key attribute that all development, where appropriate, will be required to be consistent with in order to create one of the most liveable city regions at point 16. Additionally, Policy JP-G6 Urban Green Space recognises the role of accessible urban green space in supporting a high quality of life.	Miriam Latham Julie Riley paul roebuck Jenny Lindoe
JPH4_JPH4.48	All new housing should be provided with large amounts of green space, free from future use and to support nature and wildlife, promoting wellbeing and health.	Please refer to the responses to Chapter 8 Greener Places (in particular JP-G6 Urban Green Space) and individual allocation policies.	Simon Robertson
JPH4_JPH4.49	Increasing development and associated road traffic is having a negative impact on health, and impacting ability to access green space	Please refer to Policy JP-P 6 Health which outlines how development will be required to tackle health inequalities, Policy JP-S6 Clean Air which outlines a comprehensive range of measures that will be taken to improve air quality, and Policy JP-C4 Streets for All which seeks to ensure that any new infrastructure minimises the negative effects of vehicle traffic and that the impacts of air and noise pollution and carbon emissions from road transport are mitigated. The policies within Chapter 8 Greener Places are also of relevance, particularly Policy JP-Strat 13 Strategic Green Infrastructure which aims to enable our residents to access and maximise the benefits of green infrastructure on their health and	Anthony Dann Jenny Lindoe

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		wellbeing. The Plan needs to be read as a whole, therefore no change is considered necessary.	
	Green Belt		
JPH4_JPH4.50	Replacing Green Belt with housing will maximise the need to travel, more people will need to live further away from shops, services and jobs (including planning new employment developments). As the proposals are on Green Belt people will not be living in the most accessible places, it will reduce the proportion of trips made by walking, cycling and public transport, and increase the demand for car-based travel. The plan should ensure a better distribution of housing across the Borough (Bury specifically), making full use of brownfield sites and plans in the pipeline, and minimising infrastructure development by building closer to existing transport network and employment areas.	No changes necessary. The Housing Topic Paper [06.01.03] sets out our land supply position. The majority of land identified is in the urban area with good access to public transport. Document 03.04.01 Site Selection Background Paper details the methodology used to identify potential sites for allocation and the site selection criteria. The site selection criteria included land that is well served by public transport and land which would support the delivery of long-term viable sustainable travel options. JP-H4 proposes that new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport to minimise the need to travel.	Louise Seddon Julie Halliwell
JPH4_JPH4.51	Leave Green Belt alone, development should as a priority incorporate more brownfield and use aged inefficient homes or empty properties.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	See Appendix
JPH4_JPH4.52	300 plus houses on one greenfield site is not acceptable or sustainable	No changes necessary. Given the lack of sufficient land to ensure that our overall housing and employment needs can be met, it is considered that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Individual site allocation policies provide detail on the how the site will be sustainable.	Trevor Thomas
JPH4_JPH4.53	Balance between the 9 areas is not proportional - too many houses to be built on Green Belt in Tameside.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the	Steven Brown Tina Brown

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		<p>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 in order to achieve the most sustainable pattern of development is set out in the Growth and Spatial Options Paper [02.01.10]. Full details of the options and the assessment of these against the Plan's Vision and Objectives and the IA Framework can be found in the Growth and Spatial Options Paper and the IA documentation [02.01.01]. Building upon the spatial strategy, the Site Selection Paper [03.04.01] sets out the process followed to identify the identify the most sustainable locations for residential and employment development that can achieve the PfE Vision, Objectives and Spatial Strategy and meet the housing and employment land needs across the nine districts, including the consideration of multiple sites to meet the identified needs.</p>	
JPH4_JPH4.54	<p>If all plans went ahead there would be no Green Belt land left in Rochdale. A detailed account of all Green Belt proposals should look at what Green Belt land would be left.</p>	<p>Not relevant to this policy. Matter addressed elsewhere in relation to Chapter 8 of the plan, specifically Policy JP-G 10 The Green Belt.</p>	Janine Lawford
	Other		
JPH4_JPH4.55	<p>Ever more densely populated cities with ever less desirable living conditions attract residents of a certain type, while others move out to areas which still retain some of the characteristics of 'this green and pleasant land'. Thus we see white flight to the countryside and an ever more divided country. This plan will exacerbate divisions along the lines of ethnicity, class and wealth.</p>	<p>No changes necessary. An Equality Impact Assessment has been undertaken and can be viewed in Appendix B of the Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) [02.01.02]. The Equality Impact Assessment is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010. It's scope considers the likely effects on discriminatory practices; the potential to alter the opportunities of certain groups of people; and/or effect on relationships between different groups of people. It considers Policy JP-H4 (Formerly GM-H4) at Chapter 10.5 (Page 86-87) and finds that the policy will have positive effects in relation the IA framework.</p>	Susan Sollazzi

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JPH4_JPH4.56	Density needs to reflect aspirations for sustainable places.	No changes necessary. Policy JP-H4 reflects aspirations for sustainable places by delivering appropriate densities in accessible locations such as near public transport or within designated centres.	Greater Manchester Housing Providers
JPH4_JPH4.57	Impact of density policy on character and heritage has not been considered.	No changes necessary. Policy JP-H4 addresses this at point 2 outlining that lower densities may be acceptable where they are justified by site-specific issues, such as any potential impact on the wider landscape or townscape including heritage assets. The built and historic environment is recognised through the evidence base supporting Chapter 8 Places for People. Policy JP-P 2 Heritage ensures that particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm.	HIMOR Group Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd
JPH4_JPH4.58	In terms of criterion b of the policy, paragraph 7.18 of the PfE cites the need to create new housing markets within some locations such as town centres as a reason for the proposed phasing of housing. This casts significant uncertainty over the quantum of development that can be delivered from such sources as outside the urban core, where the market for high density development is uncertain.	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] To deliver the overall strategy for the plan area, it will be vital to develop new markets for housing in some parts of the conurbation, however this may take some time to achieve. For further information, please refer to the Housing Topic Paper [06.01.03] and the Greater Manchester Strategic Housing Market Assessment [06.01.02] which discuss this matter and provide details of the market signals with regard to land values.	Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd Morris Homes (North) Ltd Persimmon Homes North West
JPH4_JPH4.59	Support the policy with the inclusion of criteria point 2.	Support noted.	Historic England
JPH4_JPH4.60	As drafted the policy and the Chapter would be very incompatible with IA Objective 16.	No changes 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
JPH4_JPH4.61	Wish to highlight that achieving high density development should not be detrimental to achieving other key policy requirements. Most notably, the achievement of high	No changes necessary. The supporting evidence for Chapter 5 Sustainable and Resilient Places including the Greater Manchester Strategic Flood Risk Assessment Level 1 Report [04.02.01] and particularly Greater Manchester Strategic Flood Risk Assessment Level 1 Appendix F - SUDS Techniques and	United Utilities Group PLC

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	densities should not be detrimental to the delivery of sustainable drainage.	Suitability [04.02.16] address the delivery of sustainable drainage. The plan should be read as a whole	
JPH4_JPH4.62	Regardless of density requirements, it will be critical that careful consideration is given to natural and multi-functional sustainable drainage as well as sustainable drainage that can be innovatively integrated into urban environments through the landscape for example, bio-retention tree pits and green roofs. This requires consideration of high quality sustainable drainage early in the design process and clear policy expectations.	Noted, The supporting evidence for Chapter 5 Sustainable and Resilient Places including the Greater Manchester Strategic Flood Risk Assessment Level 1 Report [04.02.01] and particularly Greater Manchester Strategic Flood Risk Assessment Level 1 Appendix F - SUDS Techniques and Suitability [04.02.16] address the delivery of sustainable drainage.	United Utilities Group PLC
JPH4_JPH4.63	There is no evidence in any of the documents that the PfE team has sought any insights from other areas in the UK or Europe with similar issues. Freiburg, in Germany, is an excellent example of a university town that had faced growth pressures. Unlike GM, Freiburg actively engaged its residents in the development of a solution, which led to compact (high density), child-friendly, well-connected urban development	No changes necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The consultation on the plan is addressed elsewhere.	Friends of Carrington Moss
JPH4_JPH4.64	It is also worth bearing in mind that a significant proportion of the high-rise developments currently being delivered in the Core Growth Area are PRS development and will not be released to the market for purchase by perspective first time buyers. There are also issues with the delivery of affordable dwellings within PRS schemes or PRS schemes contributing towards the delivery of offsite affordable dwellings.	No changes necessary. It is considered that a proportionate evidence base has been provided to support policy JP-H4, it can be found here: Housing Topic Paper [06.01.03] and particularly, Chapter 5.3 of the Greater Manchester Strategic Housing Market Assessment [06.01.02] addresses the rental market with reference to PRS.	Taylor Wimpey
JPH4_JPH4.65	Insufficient transport links, infrastructure and facilities to accommodate the level of development proposed.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Individual allocation	See Appendix

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		policies provide details of the required infrastructure. The Plan needs to be read as a whole, therefore no change is considered necessary.	
JPH4_JPH4.66	Question whether the promised infrastructure will be delivered.	No changes necessary. A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Individual allocation policies provide details of the required infrastructure. The Plan needs to be read as a whole, therefore no change is considered necessary.	Heather Bebbington Pugh
JPH4_JPH4.67	Creating huge urban areas with no regard for increasing traffic pollution, environmental issues, flood plains	Please refer to Policy JP-S6 Clean Air which outlines a comprehensive range of measures that will be taken to improve air quality. Policy JP-Strat 14 A Sustainable and Integrated Transport Network also sets out how we will improve the transport network to ensure that more trips can be made by public transport and active travel. Related to environmental issues, Policy JP-S 1 Sustainable Development outlines what development needs to do to tackle climate change, whilst Policy JP-S 5 Flood Risk and the Water Environment addresses how flood risk will be managed. Where relevant, allocation policies are supported by a proportionate evidence base, detailing the infrastructure required to support the development, including where necessary health provision and/or mitigation is required. Further details of which can be found in the relevant allocation topic papers. Additionally, Policy D2 states that new development must be supported by the necessary infrastructure. This approach is considered consistent with NPPF as the Plan should be read as a whole.	MiriamLatham Vicky Harper E Bowles
JPH4_JPH4.68	Living within a designated distance of any form of transport does not mean that transport can be accessed if it is overcrowded or gridlocked.	No changes necessary. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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.	Ann Nutt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPH4_JPH4.69	Need to look locally at what facilities and properties are needed, and address existing shortfalls before adding to the local population with any new development.	No changes necessary. The housing need has been assessed in the Greater Manchester Strategic Housing Market Assessment [06.01.02] . Chapter 6 of the Housing Topic Paper [06.01.03] details how the evidence has been used to inform the policies within the housing chapter in order to address the strategic housing need. A number of policies in the Plan provide a sufficient policy framework to address infrastructure, such as Policies, JP-G6, JP-P1 and JP- D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Individual allocation policies provide details of the required infrastructure.	Ann Guilfoyle
JPH4_JPH4.70	Develop all the empty buildings and offices now that people are working from home.	No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	Lesley Bardsley Samantha Dugmore
JPH4_JPH4.71	Stop building in overpopulated areas	No changes necessary. Local authorities have a requirement to meet the housing needs of the plan area. The population of Greater Manchester is projected to grow 10.1% between 2018 and 2043, further details regarding population projections can be found in the Greater Manchester Strategic Housing Market Assessment [06.01.02] within Chapter 4.	Debra O'Brien Laura Charlotte Samantha Dugmore
JPH4_JPH4.72	Greed and profiteering	Out of the scope of this plan	Vicky Harper Mike Bolton paul roebuck
JPH4_JPH4.73	People in urban areas feel that they live so close so look to move into areas with more space chasing increased growth in greenfield areas. Set a minimum square metre space per person for each site to prevent developers cramming in to maximise profit.	No changes necessary. Policy JP-H3 seeks to require all new dwellings to comply with the nationally described space standards. Please see the responses to Policy JP-H3 for further information.	Collette Gammond Linus Mortlock
JPH4_JPH4.74	No benefit to existing local communities	No changes necessary. Increasing the average density of new housing developments in the most accessible locations is an important part of our overall strategy, providing a number of benefits. It will reduce the amount of land that	Peter Stratton Julie Riley

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		needs to be used for development, thereby assisting the protection of greenfield and Green Belt land. It will help to minimise the need to travel, enabling more people to live close to shops and services, and increasing the local population necessary to support local facilities and support regeneration. It will also maximise the number of people living in the most accessible places, helping to increase the proportion of trips made by walking, cycling and public transport, and reducing the demand for car-based travel.	
JPH4_JPH4.75	Concern about loss of existing homes and communities, impact on existing communities.	Please see Row JPH4_JPH4.74.	Julie Riley Brenda Foley Jill Neal
JPH4_JPH4.76	Agree that areas are fairly sharing the load, but think that the plans for Bury put too much focus on just 2 areas which will become giant housing estates.	No changes necessary. To identify potential development sites for allocation to meet a shortfall in housing land supply, a site selection process was undertaken in line with the plan objectives and spatial strategy. Further information on this process can be found in the Site Selection Background Paper [03.04.01] . The allocation topic papers for the three allocations proposed in Bury can be found here: 10.03 Site Allocations - Bury . The reasoning for each allocation is detailed within the site allocation topic papers.	Jane White
JPH4_JPH4.77	Density should not be taken to extremes.	No changes necessary. The density ratios proposed in the PfE are considered to be realistic and offer sufficient flexibility where a lower density can be justified in line with the criteria.	Peter Christie
JPH4_JPH4.78	Good internet connectivity is what will reduce work related travel, not over polluted cramped housing.	No changes necessary. Policy JP-C 2 Digital Connectivity will support the provision of affordable, high quality digital infrastructure such as internet connections. Furthermore in terms of travel, the PfE aims to minimise the need to travel, enabling more people to live close to shops and services, and increasing the local population necessary to support local facilities and support regeneration. With regard to work related travel, it will also maximise the number of people living in the most accessible places, helping to increase the proportion of trips made by walking, cycling and public transport, and reducing the demand for car-based travel.	Martha Hughes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPH4_JPH4.79	Town centres and redundant buildings have not been considered fully in the light of Covid impact. Put plan on hold until a review post covid.	No changes necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	Lesley Bardsley
JPH4_JPH4.80	Bolton town centre plan is the way forward.	Noted	Chris Green
JPH4_JPH4.81	Environmental issues - don't kill great crested newts	Not relevant to this policy. Matter addressed elsewhere	Paul Gilbert
JPH4_JPH4.82	Policy unsound / not legally compliant (no further details given).	No change is considered necessary. Policy JP-H4 is considered to be consistent with the NPPF and provides an appropriate strategy for the density of new housing which is a key objective of the plan and NPPF.	See Appendix

Appendix:

Respondents to PfE 2021 Policy JP-H1

Table 1. Policy JP-H1 additional respondents

Row	Respondent name
JPH1_JPH1.1	<p>St. Helens Council</p> <p>Bowden Rugby Club</p> <p>Miri Roshni</p> <p>W R Halman</p> <p>C L Halman</p> <p>F I Carless</p> <p>J M Gibney</p> <p>Bluemantle</p> <p>Morris Homes</p> <p>Emerson Automation Systems UK Limit</p> <p>Milnes Gaskell Estate</p> <p>NPL Group</p> <p>Prospect GB and Dobinetts Regen</p> <p>Greater Manchester Housing Providers</p> <p>Countryside Properties LLP, Casey Group Ltd and Wain Homes</p> <p>J and B Fitton</p> <p>GLP Trows LLP and BDW Trading Ltd</p> <p>Chorley Council</p> <p>D Court</p>
JPH1_JPH1.2	<p>Northern Gateway Development Vehicle LLP (c/o Helen Hartley)</p> <p>Northern Gateway Development Vehicle (c/o Helen Hartley)</p> <p>Northern Gateway Development Vehicle (c/o Helen Hartley)</p> <p>Story Homes Limited</p> <p>Story Homes Limited</p> <p>Gladman Developments</p> <p>Peel L&P Investments (North) Ltd</p> <p>Harworth Group Plc</p> <p>Milnes Gaskell Estate</p> <p>Redcliff Estates</p> <p>Highgrove Strategic Land Ltd</p> <p>Crossways Commercial Estates Ltd</p> <p>Rowland Homes Ltd</p> <p>Hollins Strategic Land</p> <p>Steven Breheny</p> <p>Bellway Homes Ltd</p> <p>Miller Homes</p> <p>Barratt Manchester Limited</p> <p>NPL Group</p> <p>LQ Estates and Trafford HT</p> <p>EON Plant Ltd</p> <p>PD Northern Steels</p> <p>Landowners of Holme Valley</p> <p>Countryside Properties LLP, Casey Group Ltd and Wain Homes</p> <p>J and B Fitton</p>

Row	Respondent name
	GLP Trows LLP and BDW Trading Ltd PD Northern Trust Asset Management Richborough Estates HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land Redrow Homes Limited Hollins Strategic Land LLP Hollins Strategic Land HIMOR, Redrow Homes Limited and VHW Partnership Wainhomes (NW) Ltd and Persimmon Homes Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.3	Lisa Powell David McLaughlin Lisa Mather Deborah Morgan Peter Mather Susan Higgins Andrea Keeble Juliet Eastham Oscar Majid Stuart Johnstone Yvonne Robinson Susan Fleming Andrew Fleming Catherine Schofield Michelle Mcloughlin Tom Wood Joan Glynn Viv Barlow Jacqueline Majid S Stratton Colin Heaton Hazel Keane John Robinson Susan Horridge Barry Spence Shirley Buckley Joanne Dawson George Wood Joanne Culliney Christopher Culliney Annmarie Bennett Rebecca Robinson Alexandra Saffer Daniel Robinson Derek M Glynn

Row	Respondent name
	Carole Martin
	Carolyn Saffer
	Geoff Woods
	Samantha Doggett
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw
	Paul Taylor
	Lucy Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Cooke
	Brian Wright
	Kelly Fox
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Victoria Hothersall
	Abby Derere
	Craig Tucker
	Adam Burgess
	Jacqueline Yarwood
	Anna Katherine Burgess
	Alan Bayfield
	Debbie Pownceby
	Rebecca Hindle
	Gwynneth McManus
	Marjorie Higham
	Gwyneth Derere
	Nicola Kerr
	Andy Skelly
	Julia Gallagher
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Emma Nye
	Kath Dobson
	Carl Mason
	Jackie Harris Cllr
	Jane Bennett
	Leanne Labrow
	Thornham St John's Neighbourhood Forum
	Pamela Maxon
	Alexandra Cluer
	Dawn Johnstone
	Mark H Burton

Row	Respondent name
	<p>Bellway Homes Ltd Howard Sykes GLP Trows LLP and BDW Trading Ltd Oltec Group Ltd David Bentley Story Homes Limited Jeremy Williams Gladman Developments Redrow Homes (Lancashire) Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.7	<p>Story Homes Limited Peel L&P Investments (North) Ltd Harworth Group Plc Redcliff Estates Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd Seddon Homes Ltd HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Wainhomes (NW) Ltd and Persimmon Homes Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.9	<p>Morris Homes (North) Ltd Story Homes Limited Gladman Developments Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd Barratt Manchester Limited PD Northern Steels LQ Estates and Trafford HT EON Plant Ltd PD Northern Steels Seddon Homes Ltd PD Northern Trust Asset Management Richborough Estates HIMOR Group Sophia Flemming Consulting Ltd Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land</p>

Row	Respondent name
	SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Boys & Girls Club of GM Boys & Girls Club of GM BDW Trading Ltd Hollins Strategic Land Hollins Strategic Land Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.10	Story Homes Limited Peel L&P Investments (North) Ltd Harworth Group Plc Harworth Group Plc. Hollins Strategic Land Bellway Homes Ltd Miller Homes Barratt Manchester Limited PD Northern Steels Seddon Homes Ltd Richborough Estates HIMOR Group Hollins Strategic Land Redrow Homes Limited SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Boys & Girls Club of GM Boys & Girls Club of GM BDW Trading Ltd Hollins Strategic Land Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey
	Story Homes Limited Peel L&P Investments (North) Ltd Hollins Strategic Land Bellway Homes Ltd Seddon Homes Ltd

Row	Respondent name
	<p>HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Housebuilding Consortium Taylor Wimpey Persimmon Homes North West Morris Homes (North) Ltd Redrow Homes (Lancashire) Murphy Group Highgrove Strategic Land Ltd Rowland Homes Ltd Miller Homes Barratt Manchester Limited PD Northern Steels LQ Estates and Trafford HT EON Plant Ltd PD Northern Steels Landowners of Holme Valley GLP Trows LLP and BDW Trading Ltd PD Northern Trust Asset Management Oltec Group Ltd PD Northern Trust Asset Management SRH Properties Ltd Seddon Homes Ltd GLP Ltd Boys & Girls Club of GM Boys & Girls Club of GM HIMOR, Redrow Homes Limited and VHW Partnership James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Story Homes Limited Harworth Group Plc Harworth Group Plc. Crossways Commercial Estates Ltd Richborough Estates Miller Homes Gladman Developments</p>
JPH1_JPH1.13	<p>Miller Homes Peel L&P Investments (North) Ltd Royal London Asset Management Murphy Group Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land PD Northern Steels PD Northern Trust Asset Management HIMOR Group PD Northern Trust Asset Management</p>

Row	Respondent name
	<p>Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Hollins Strategic Land James Stevens Wainhomes (NW) Ltd</p>
JPH1_JPH1.14	<p>Northern Gateway Development Vehicle LLP (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited Gladman Developments Redrow Homes (Lancashire) Peel L&P Investments (North) Ltd Royal London Asset Management Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Steven Breheny Bellway Homes Ltd Barratt Manchester Limited PD Northern Steels LQ Estates and Trafford HT EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management HIMOR Group Sophia Flemming Consulting Ltd Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land Hollins Strategic Land LLP Boys & Girls Club of GM Boys & Girls Club of GM Hollins Strategic Land HIMOR, Redrow Homes Limited and VHW Partnership James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.18	<p>Helen Skidmore Kim Scragg Joanne Maffia Martin Rigby Jeremy Williams Andrew Scanlon</p>

Row	Respondent name
	Jane Barker Warburton Parish Council Zoe Sherlock AARD - Action Against Rural Development Mark H Burton David Bentley David McLaughlin Christopher Russell Debbie Abrahams Lisa Powell Robyn Powell Sam Powell Steven Brown Tina Brown Grace Farrell D W And J Tandy Jane Lester The Friends of Bury Folk Woodford Neighbourhood Forum Susan Sollazzi
JPH1_JPH1.21	Mildred D'Amore Alan Sheppard Susan Dennett Julie Halliwell Matthew Oxley Gary West Alan Bayfield David McLaughlin Pat Dainter C Smith Andrew Scanlon Kay Meredith Jane Lester Janine Ainley Bernie Burns The Friends of Bury Folk Stephen Cluer Christopher Russell Warburton Parish Council Lisa Mather Deborah Morgan Peter Mather Susan Higgins Andrea Keeble Juliet Eastham Oscar Majid Stuart Johnstone Yvonne Robinson Susan Fleming

Row	Respondent name
	Andrew Fleming
	Catherine Schofield
	Michelle Mcloughlin
	Tom Wood
	Joan Glynn
	Viv Barlow
	Jacqueline Majid
	S Stratton
	Colin Heaton
	Hazel Keane
	John Robinson
	Susan Horridge
	Barry Spence
	Shirley Buckley
	Joanne Dawson
	George Wood
	Joanne Culliney
	Christopher Culliney
	Annmarie Bennett
	Rebecca Robinson
	Alexandra Saffer
	Daniel Robinson
	Derek M Glynn
	Carole Martin
	Carolyn Saffer
	Geoff Woods
	Samantha Doggett
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw
	Paul Taylor
	Lucy Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Cooke
	Brian Wright
	Kelly Fox
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Victoria Hothersall
	Abby Derere
	Craig Tucker
	Adam Burgess
	Jacqueline Yarwood
	Anna Katherine Burgess

Row	Respondent name
	Alan Bayfield
	Debbie Pownceby
	Rebecca Hindle
	Gwynneth McManus
	Marjorie Higham
	Gwyneth Derere
	Nicola Kerr
	Andy Skelly
	Julia Gallagher
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Emma Nye
	Kath Dobson
	David Boulger
	Carl Mason
	Jackie Harris Cllr
	Jane Bennett
	Leanne Labrow
	Maika Fleischer
	Thornham St John's Neighbourhood Forum
	Suzanne Nye
	Mat Burbery
	Elaine Robertson
	Alex Abbey
	Doug Kirkpatrick
	Caroline O'Donnell
	Mary Walsh
	G R Walsh
	Climate Action Bury
	Anthony Heed
	Carole Heed
	Pamela Maxon
	Alexandra Cluer
	Dawn Johnstone
	CPRE
	Elisabeth Berry
	Daniel Heap
	David Brownlow
	Robert Birchmore
	Jim McMahan
	Save Crimble Mill Greenbelt Group
	David Bentley
	Daniel Lawson
	Save Greater Manchester's Green Belt (SGMGB)
	Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups
	Save Greater Manchesters Green Belt (SGMGB) - Bury Groups
	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
	Save Greater Manchesters Green Belt (SGMGB) - Save Apethorn & Bowlacre

Row	Respondent name
	Philip Smith-Lawrence Juliet Eastham Royal London Asset Management
JPH1_JPH1.22	Lisa Mather Deborah Morgan Peter Mather Susan Higgins Andrea Keeble Juliet Eastham Oscar Majid Stuart Johnstone Yvonne Robinson Susan Fleming Andrew Fleming Catherine Schofield Michelle Mcloughlin Tom Wood Joan Glynn Viv Barlow Jacqueline Majid S Stratton Colin Heaton Hazel Keane John Robinson Susan Horridge Barry Spence Shirley Buckley Joanne Dawson George Wood Joanne Culliney Christopher Culliney Annmarie Bennett Rebecca Robinson Alexandra Saffer Daniel Robinson Derek M Glynn Carole Martin Carolyn Saffer Geoff Woods Samantha Doggett Saul Bennett Colleen Donovan-Togo Angela Shaw Paul Taylor Lucy Taylor Aimee Shaw Jennifer Cronin Barbara Cooke Lorraine Tucker

Row	Respondent name
	Sheila Jackson Brian Cooke Brian Wright Kelly Fox Paul Yarwood Lisa Wright Sara Slater Victoria Hothersall Abby Derere Craig Tucker Adam Burgess Jacqueline Yarwood Anna Katherine Burgess Alan Bayfield Debbie Pownceby Rebecca Hindle Gwynneth McManus Marjorie Higham Gwyneth Derere Nicola Kerr Andy Skelly Julia Gallagher Joanne Dallimore Alison Lees David J Arnfield Emma Nye Kath Dobson Carl Mason Jackie Harris Cllr Jane Bennett Leanne Labrow Pamela Maxon Alexandra Cluer Dawn Johnstone Christopher Russell
JPH1_JPH1.32	Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke

Row	Respondent name
	<p>Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell</p>
JPH1_JPH1.59	<p>Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell</p>
JPH1_JPH1.61	<p>Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd</p>

Row	Respondent name
	<p>Ms P. Lutener Mr P. Haworth Mr E. Connell Persimmon Homes North West Morris Homes (North) Ltd</p>
JPH1_JPH1.62	<p>Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell</p>
JPH1_JPH1.83	<p>Gary Hoerty Gary Hoerty Morris Homes Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Redrow Homes (Trafford) PD Northern Steels GLP Trows LLP and BDW Trading Ltd PD Northern Trust Asset Management HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land Redrow Homes Limited SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd BDW Trading Ltd Hollins Strategic Land</p>

Row	Respondent name
	<p>Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Bellway Homes Ltd Miller Homes Barratt Manchester Limited LQ Estates and Trafford HT EON Plant Ltd</p>
JPH1_JPH1.84	<p>Story Homes Limited Gladman Developments Peel L&P Investments (North) Ltd Milnes Gaskell Estate Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd NPL Group David Morris PD Northern Steels GLP Trows LLP and BDW Trading Ltd PD Northern Trust Asset Management HIMOR Group Oltex Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Hollins Strategic Land Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey Miller Homes Harworth Group Plc. Redrow Homes (Trafford) EON Plant Ltd</p>
JPH1_JPH1.85	<p>Story Homes Limited Morris Homes Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land</p>

Row	Respondent name
	<p>Bellway Homes Ltd Redrow Homes (Trafford) Seddon Homes Ltd GLP Trows LLP and BDW Trading Ltd HIMOR Group Oltec Group Ltd Hollins Strategic Land Redrow Homes Limited SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd BDW Trading Ltd Hollins Strategic Land Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.90	<p>Miller Homes Metacre Ltd Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited Gladman Developments Redrow Homes (Lancashire) Peel L&P Investments (North) Ltd Harworth Group Plc. Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Steven Breheny Bellway Homes Ltd Redrow Homes (Trafford) Miller Homes Barratt Manchester Limited David Morris LQ Estates and Trafford HT Seddon Homes Ltd PD Northern Trust Asset Management HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd BDW Trading Ltd</p>

Row	Respondent name
	<p>Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey Morris Homes Bellway Homes Ltd EON Plant Ltd Redrow Homes Limited HIMOR, Redrow Homes Limited and VHW Partnership</p>
JPH1_JPH1.104	<p>Story Homes Limited Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd Miller Homes PD Northern Steels PD Northern Steels Seddon Homes Ltd PD Northern Trust Asset Management Oltex Group Ltd PD Northern Trust Asset Management Hollins Strategic Land Boys & Girls Club of GM Boys & Girls Club of GM Hollins Strategic Land Housebuilding Consortium Taylor Wimpey</p>
JPH1_JPH1.110	<p>The Strategic Land Group D Jones Rowland Homes Story Homes Limited Kellen Home Redrow Homes (Lancashire) Harworth Group Plc. Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd Miller Homes Barratt Manchester Limited PD Northern Steels LQ Estates and Trafford HT EON Plant Ltd Seddon Homes Ltd GLP Trows LLP and BDW Trading Ltd</p>

Row	Respondent name
	PD Northern Trust Asset Management HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd BDW Trading Ltd Hollins Strategic Land Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey Persimmon Homes North West Morris Homes (North) Ltd Harworth Group Plc Crossways Commercial Estates Ltd Hollins Strategic Land Steven Breheny Boys & Girls Club of GM Boys & Girls Club of GM
JPH1_JPH1.111	The Strategic Land Group Story Homes Limited Highgrove Strategic Land Ltd Crossways Commercial Estates Ltd Rowland Homes Ltd Hollins Strategic Land Steven Breheny Miller Homes Barratt Manchester Limited David Morris LQ Estates and Trafford HT EON Plant Ltd Seddon Homes Ltd Landowners of Holme Valley PD Northern Trust Asset Management HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd

Row	Respondent name
	Boys & Girls Club of GM Boys & Girls Club of GM BDW Trading Ltd Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.113	Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited Rowland Homes Ltd Barratt Manchester Limited PD Northern Steels The Strategic Land Group Hollins Strategic Land Seddon Homes Ltd HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land Hollins Strategic Land LLP BDW Trading Ltd Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.116	The Strategic Land Group D Jones Rowland Homes Story Homes Limited Crossways Commercial Estates Ltd Rowland Homes Ltd Hollins Strategic Land Miller Homes Seddon Homes Ltd Landowners of Holme Valley HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Boys & Girls Club of GM Boys & Girls Club of GM

Row	Respondent name
	BDW Trading Ltd Hollins Strategic Land Jones Homes (North West) Ltd Seddon Homes Ltd James Stevens Wainhomes (NW) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.118	The Strategic Land Group Hollins Strategic Land Barratt Manchester Limited Landowners of Holme Valley HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Seddon Homes Ltd Seddon Homes Ltd Wainhomes (NW) Ltd Wainhomes (NW) Ltd LQ Estates and Trafford HT EON Plant Ltd Boys & Girls Club of GM Boys & Girls Club of GM Rowland Homes BDW Trading Ltd Jones Homes (North West) Ltd
JPH1_JPH1.121	Rowland Homes Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Trust Asset Management PD Northern Trust Asset Management James Stevens Oltec Group Ltd BDW Trading Ltd Jones Homes (North West) Ltd
JPH1_JPH1.122	Oltec Group Ltd BDW Trading Ltd Jones Homes (North West) Ltd Story Homes Limited Highgrove Strategic Land Ltd Rowland Homes Ltd Bellway Homes Ltd LQ Estates and Trafford HT EON Plant Ltd Seddon Homes Ltd PD Northern Trust Asset Management PD Northern Trust Asset Management James Stevens

Row	Respondent name
	Housebuilding Consortium Taylor Wimpey Redrow Homes (Lancashire) Oltec Group Ltd SRH Properties Ltd Seddon Homes Ltd GLP Ltd BDW Trading Ltd Jones Homes (North West) Ltd Miller Homes
JPH1_JPH1.141	The Strategic Land Group D Jones Story Homes Limited Peel L&P Investments (North) Ltd Hollins Strategic Land Miller Homes Barratt Manchester Limited David Morris PD Northern Steels PD Northern Trust Asset Management HIMOR Group Oltec Group Ltd PD Northern Trust Asset Management Hollins Strategic Land SRH Properties Ltd Hollins Strategic Land LLP Seddon Homes Ltd GLP Ltd Hollins Strategic Land Seddon Homes Ltd Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd
JPH1_JPH1.147	Alan Sheppard Susan Dennett The Strategic Land Group D Jones Matthew Oxley Gary West Alan Bayfield Rowland Homes David McLaughlin C Smith Jane Lester The Friends of Bury Folk Stephen Cluer Christopher Russell Philip Smith-Lawrence Juliet Eastham Lisa Mather

Row	Respondent name
	Deborah Morgan
	Peter Mather
	Susan Higgins
	Andrea Keeble
	Juliet Eastham
	Oscar Majid
	Stuart Johnstone
	Yvonne Robinson
	Susan Fleming
	Andrew Fleming
	Catherine Schofield
	Michelle Mcloughlin
	Tom Wood
	Joan Glynn
	Viv Barlow
	Jacqueline Majid
	S Stratton
	Colin Heaton
	Hazel Keane
	John Robinson
	Susan Horridge
	Barry Spence
	Shirley Buckley
	Joanne Dawson
	George Wood
	Joanne Culliney
	Christopher Culliney
	Annmarie Bennett
	Rebecca Robinson
	Alexandra Saffer
	Daniel Robinson
	Derek M Glynn
	Carole Martin
	Carolyn Saffer
	Geoff Woods
	Samantha Doggett
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw
	Paul Taylor
	Lucy Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Cooke
	Brian Wright
	Kelly Fox

Row	Respondent name
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Victoria Hothersall
	Abby Derere
	Craig Tucker
	Adam Burgess
	Jacqueline Yarwood
	Anna Katherine Burgess
	Alan Bayfield
	Debbie Pownceby
	Rebecca Hindle
	Gwynneth McManus
	Marjorie Higham
	Gwyneth Derere
	Nicola Kerr
	Andy Skelly
	Julia Gallagher
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Emma Nye
	Peter Cooke
	Kath Dobson
	Donald Berry
	David Boulger
	Carl Mason
	Patricia Hay
	Jackie Harris Cllr
	Jane Bennett
	Leanne Labrow
	Suzanne Nye
	Caroline O'Donnell
	Redrow Homes (Lancashire)
	Pamela Maxon
	Alexandra Cluer
	Jason Robinson
	Katherine Robinson
	Dawn Johnstone
	Elisabeth Berry
	Hollins Strategic Land
	Robert Birchmore
	HIMOR Group
	Hollins Strategic Land
	Hollins Strategic Land LLP
	Hollins Strategic Land
	Seddon Homes Ltd
	Wainhomes (NW) Ltd
	Daniel Lawson

Row	Respondent name
JPH1_JPH1.148	<p>The Strategic Land Group</p> <p>Redrow Homes (Lancashire)</p> <p>Royal London Asset Management</p> <p>Crossways Commercial Estates Ltd</p> <p>Hollins Strategic Land</p> <p>PD Northern Steels</p> <p>Landowners of Holme Valley</p> <p>HIMOR Group</p> <p>Oltec Group Ltd</p> <p>Hollins Strategic Land</p> <p>SRH Properties Ltd</p> <p>Hollins Strategic Land LLP</p> <p>Seddon Homes Ltd</p> <p>GLP Ltd</p> <p>Hollins Strategic Land</p> <p>Seddon Homes Ltd</p> <p>Wainhomes (NW) Ltd</p>
JPH1_JPH1.150	<p>The Strategic Land Group</p> <p>Story Homes Limited</p> <p>Redrow Homes (Lancashire)</p> <p>Hollins Strategic Land</p> <p>Bellway Homes Ltd</p> <p>Seddon Homes Ltd</p> <p>HIMOR Group</p> <p>Hollins Strategic Land</p> <p>Hollins Strategic Land LLP</p> <p>Hollins Strategic Land LLP</p> <p>Hollins Strategic Land</p> <p>Seddon Homes Ltd</p> <p>Wainhomes (NW) Ltd</p> <p>Wainhomes (NW) Ltd</p> <p>Housebuilding Consortium</p> <p>Taylor Wimpey</p>
JPH1_JPH1.151	<p>The Strategic Land Group</p> <p>Hollins Strategic Land</p> <p>Miller Homes</p> <p>Barratt Manchester Limited</p> <p>David Morris</p> <p>PD Northern Steels</p> <p>LQ Estates and Trafford HT</p> <p>PD Northern Trust Asset Management</p> <p>HIMOR Group</p> <p>PD Northern Trust Asset Management</p> <p>Hollins Strategic Land</p> <p>Hollins Strategic Land LLP</p> <p>Boys & Girls Club of GM Boys & Girls Club of GM</p> <p>Hollins Strategic Land</p> <p>Seddon Homes Ltd</p> <p>Wainhomes (NW) Ltd</p>

Row	Respondent name
	Bellway Homes Ltd Oltec Group Ltd BDW Trading Ltd Jones Homes (North West) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.153	Matthew Oxley Gary West Alan Bayfield David McLaughlin C Smith The Friends of Bury Folk Stephen Cluer Christopher Russell Philip Smith-Lawrence Juliet Eastham Lisa Mather Deborah Morgan Peter Mather Susan Higgins Andrea Keeble Juliet Eastham Oscar Majid Stuart Johnstone Yvonne Robinson Susan Fleming Andrew Fleming Catherine Schofield Michelle Mcloughlin Tom Wood Joan Glynn Viv Barlow Jacqueline Majid S Stratton Colin Heaton Hazel Keane John Robinson Susan Horridge Barry Spence Shirley Buckley Joanne Dawson George Wood Joanne Culliney Christopher Culliney Annmarie Bennett Rebecca Robinson Alexandra Saffer Daniel Robinson Derek M Glynn Carole Martin

Row	Respondent name
	Carolyn Saffer
	Geoff Woods
	Samantha Doggett
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw
	Paul Taylor
	Lucy Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Cooke
	Brian Wright
	Kelly Fox
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Victoria Hothersall
	Abby Derere
	Craig Tucker
	Adam Burgess
	Jacqueline Yarwood
	Anna Katherine Burgess
	Alan Bayfield
	Debbie Pownceby
	Rebecca Hindle
	Gwynneth McManus
	Marjorie Higham
	Gwyneth Derere
	Nicola Kerr
	Andy Skelly
	Julia Gallagher
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Emma Nye
	Peter Cooke
	Kath Dobson
	Donald Berry
	David Boulger
	Carl Mason
	Patricia Hay
	Jackie Harris Cllr
	Jane Bennett
	Leanne Labrow
	Suzanne Nye
	Caroline O'Donnell

Row	Respondent name
	Pamela Maxon Alexandra Cluer Jason Robinson Katherine Robinson Dawn Johnstone Elisabeth Berry Robert Birchmore Daniel Lawson
JPH1_JPH1.154	Matthew Oxley Gary West Alan Bayfield C Smith Stephen Cluer Christopher Russell Philip Smith-Lawrence Juliet Eastham Lisa Mather Deborah Morgan Peter Mather Susan Higgins Andrea Keeble Juliet Eastham Oscar Majid Stuart Johnstone Yvonne Robinson Susan Fleming Andrew Fleming Catherine Schofield Michelle Mcloughlin Tom Wood Joan Glynn Viv Barlow Jacqueline Majid S Stratton Colin Heaton Hazel Keane John Robinson Susan Horridge Barry Spence Shirley Buckley Joanne Dawson George Wood Joanne Culliney Christopher Culliney Annmarie Bennett Rebecca Robinson Alexandra Saffer Daniel Robinson Derek M Glynn

Row	Respondent name
	Carole Martin
	Carolyn Saffer
	Geoff Woods
	Samantha Doggett
	Saul Bennett
	Colleen Donovan-Togo
	Angela Shaw
	Paul Taylor
	Lucy Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Sheila Jackson
	Brian Cooke
	Brian Wright
	Kelly Fox
	Paul Yarwood
	Lisa Wright
	Sara Slater
	Victoria Hothersall
	Abby Derere
	Craig Tucker
	Adam Burgess
	Jacqueline Yarwood
	Anna Katherine Burgess
	Alan Bayfield
	Debbie Pownceby
	Rebecca Hindle
	Gwynneth McManus
	Marjorie Higham
	Gwyneth Derere
	Nicola Kerr
	Andy Skelly
	Julia Gallagher
	Joanne Dallimore
	Alison Lees
	David J Arnfield
	Emma Nye
	Peter Cooke
	Kath Dobson
	Donald Berry
	David Boulger
	Carl Mason
	Patricia Hay
	Jackie Harris Cllr
	Jane Bennett
	Leanne Labrow
	Suzanne Nye

Row	Respondent name
	<p>Caroline O'Donnell Pamela Maxon Alexandra Cluer Jason Robinson Katherine Robinson Dawn Johnstone Elisabeth Berry Hollins Strategic Land The Strategic Land Group D Jones Miller Homes Barratt Manchester Limited LQ Estates and Trafford HT Seddon Homes Ltd HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Seddon Homes Ltd Wainhomes (NW) Ltd Wainhomes (NW) Ltd</p>
JPH1_JPH1.161	<p>The Strategic Land Group D Jones Hollins Strategic Land HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Seddon Homes Ltd Wainhomes (NW) Ltd</p>
JPH1_JPH1.169	<p>Susan Dennett Save Greater Manchester's Green Belt (SGMGB) Lisa Powell Robyn Powell Sam Powell Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups Save Greater Manchesters Green Belt (SGMGB) - Bury Groups Matthew Oxley Alan Bayfield Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Save Greater Manchesters Green Belt (SGMGB) - Save Apethorn & Bowlacre C Smith Jane Lester The Friends of Bury Folk Stephen Cluer Christopher Russell Ian Hubbard Howard Sykes Friends of Carrington Moss</p>

Row	Respondent name
	Daniel Lawson Janine Lawford Save Royton's Greenbelt Community Group Woodford Neighbourhood Forum
JPH1_JPH1.179	Trevor Widdop Helen Skidmore Peter Christie Sophie Hadfield Collette Gammond Graham White Paul Gilbert E Bowles Julie Halliwell David Hawes Brenda Foley Jennifer Simm Jill Neal Martha Hughes Janine Ainley Bernie Burns Mark H Burton D W And J Tandy Grace Farrell Jill Neal Carl Southward CPRE Paul Roebuck Geoffrey Ralphs Paula Allison Samantha Dugmore Louise Seddon Kim Scragg Gillian Boyle Martin Rigby Mark Haynes Amanda Parker Glenn Dillon Andrew Richardson Andrew Scanlon Kay Meredith Simon Robertson Tina Chester Jane Barker Howard Sykes Jane Lester The Friends of Bury Folk Stephen Cluer Woodford Neighbourhood Forum Jim McMahan

Row	Respondent name
	<p>Colin Walters Samantha Dugmore Edward Beckmann Kay Meredith Lesley bardsley Friends of Carrington Moss Save Greater Manchester's Green Belt (SGMGB) Thornham St John's Neighbourhood Forum Gary West Alan Bayfield David McLaugh Jennifer Simm Stephen Cluer Christopher Russell Philip Smith-Lawrence Juliet Eastham Daniel Heap Ann Nutt Maureen Buttle Joanna Harland Chris Green Janine Lawford David McLaugh David Bentley SGMGB - Oldham Groups SGMGB - Bury Groups SGMGB - Rochdale Groups SGMGB - Save Apethorn & Bowlacre Climate Action Bury</p>
JPH1_JPH1.184	<p>Story Homes Limited Plan:8 Town Planning Ltd Wainhomes (NW) Ltd and Persimmon Homes Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick</p>

Row	Respondent name
	<p>The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell Harworth Group Plc Murphy Group Hollins Strategic Land Bellway Homes Ltd David Morris Housebuilding Consortium Taylor Wimpey LQ Estates and Trafford HT</p>
JPH1_JPH1.185	<p>Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell</p>
JPH1_JPH1.187	<p>Rowland Homes Persimmon Homes North West Morris Homes (North) Ltd Hollins Strategic Land Steven Breheny HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Wainhomes (NW) Ltd The Strategic Land Group Highgrove Strategic Land Ltd Crossways Commercial Estates Ltd Rowland Homes Ltd</p>

Row	Respondent name
	<p>Miller Homes Barratt Manchester Limited David Morris LQ Estates and Trafford HT EON Plant Ltd Seddon Homes Ltd Landowners of Holme Valley Francis Lee SRH Properties Ltd Seddon Homes Ltd GLP Ltd Seddon Homes Ltd Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Boys & Girls Club of GM Home Builders Federation</p>
JPH1_JPH1.190	<p>Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups Save Greater Manchesters Green Belt (SGMGB) - Bury Groups Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Save Greater Manchesters Green Belt (SGMGB) - Save Apethorn & Bowlacre Janine Lawford Jane Lester The Friends of Bury Folk Stephen Cluer Woodford Neighbourhood Forum Thornham St John's Neighbourhood Forum David Bentley</p>
JPH1_JPH1.195	<p>Tracy Doyle Russell Wood Helen Lomax Louise Bolotin Lauren Millward heather Bebbington pugh Steven Brown Tina Brown Joanna Harland Martha Hughes Vicky Harper Kevin Lawton Ian Hubbard Howard Sykes D W And J Tandy Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey Geoffrey Ralphs Paula Allison Samantha Dugmore</p>

Row	Respondent name
	Jenny Lindoe Jeff Houghton Joanne Koffman Ann Nutt Maureen Buttle Alison Doherty Rachel Mellish Kay Meredith Debra O'Brien Roy Chapman
JPH1_JPH1.196	Anthony Dann Stephen Woolley Mike Bolton Samantha Dugmore Louise Seddon Jenny Lindoe Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey Andrew Wales Jenny Lindoe Martha Hughes Bernie Burns Rachel Rutherford Howard Sykes
JPH1_JPH1.198	Alan Sheppard Susan Dennett Matthew Oxley Gary West Alan Bayfield Carol Burke C Smith Stephen Cluer Christopher Russell Maika Fleischer Suzanne Nye D W And J Tandy David Brownlow Robert Birchmore Daniel Lawson
JPH1_JPH1.210	Paul Gilbert Samantha Dugmore Tina Chester Vicky Harper Rachel Rutherford The Wildlife Trusts David Bentley
JPH1_JPH1.216	Rachel Mellish

Row	Respondent name
	Joanna Harland Andrew Richards Ann Guilfoyle Chris Green Vicky Harper Peter Thompson Anthony Dann Andrew Wales Louise Seddon Peel L&P Investments (North) Ltd Hollins Strategic Land Peter Thompson HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd
JPH1_JPH1.217	Save Greater Manchester's Green Belt (SGMGB) SGMGB - Oldham Groups SGMGB - Bury Groups SGMGB - Rochdale Groups SGMGB - Save Apethorn & Bowlacre Jane Lester The Friends of Bury Folk Stephen Cluer
JPH1_JPH1.232	Rowland Homes Persimmon Homes North West Morris Homes (North) Ltd Story Homes Limited Redrow Homes (Lancashire) Peel L&P Investments (North) Ltd Harworth Group Plc Murphy Group Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd HIMOR Group Hollins Strategic Land SRH Properties Ltd Seddon Homes Ltd GLP Ltd James Stevens Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey Mr J. Downs

Row	Respondent name
	Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell Metacre Ltd PD Northern Steels Seddon Homes Ltd GLP Trows LLP and BDW Trading Ltd Hollins Strategic Land Rosedale Property Holdings Limited
JPH1_JPH1.234	The Strategic Land Group D Jones Story Homes Limited Highgrove Strategic Land Ltd Rowland Homes Ltd Hollins Strategic Land Seddon Homes Ltd HIMOR Group Hollins Strategic Land Hollins Strategic Land LLP Hollins Strategic Land Seddon Homes Ltd Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Wainhomes (NW) Ltd
JPH1_JPH1.236	Story Homes Limited Alan Kirkham Peel L&P Investments (North) Ltd Bellway Homes Ltd GLP Trows LLP and BDW Trading Limited Home Builders Federation Wainhomes (NW) Ltd and Persimmon Homes

Row	Respondent name
	Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.239	Story Homes Limited Hollins Strategic Land Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey
JPH1_JPH1.240	Mr J. Downs Quantum Star Ltd Mr I Corbett Mrs Hind Mr B.H. Tomlinson Trustees of The Summershades Trust Ms K. Welton Mr and Mrs A Hegab Mr K. Henthorn Mr and Mrs A Lord Mr S. Ingram Ms K. McAvoy Mr D. Winterbottom Mr W. Clarke Mr Z. Iqbal Mr A. Tomlinson & Mr D, Lees Ms D. Vick The Connell Group Tanner Bros Ltd Ms P. Lutener Mr P. Haworth Mr E. Connell
JPH1_JPH1.249	Story Homes Limited Bellway Homes Ltd Housebuilding Consortium Taylor Wimpey The Strategic Land Group D Jones Story Homes Limited Peel L&P Investments (North) Ltd Hollins Strategic Land Bellway Homes Ltd David Morris PD Northern Steels Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey Home Builders Federation James Stevens
JPH1_JPH1.252	Samantha Dugmore Susan Dennett

Row	Respondent name
	<p>Save Greater Manchester's Green Belt (SGMGB)</p> <p>D Jones</p> <p>Matthew Oxley</p> <p>Gary West</p> <p>Alan Bayfield</p> <p>David McLaughlin</p> <p>C Smith</p> <p>Andrew Richardson</p> <p>Jane Lester</p> <p>The Friends of Bury Folk</p> <p>Stephen Cluer</p> <p>Christopher Russell</p> <p>Woodford Neighbourhood Forum</p> <p>Philip Smith-Lawrence</p> <p>Juliet Eastham</p> <p>Elisabeth Berry</p> <p>David Brownlow</p> <p>Robert Birchmore</p> <p>Friends of Carrington Moss</p> <p>Daniel Lawson</p>
JPH1_JPH1.253	<p>Susan Dennett</p> <p>Save Greater Manchester's Green Belt (SGMGB)</p> <p>Matthew Oxley</p> <p>Gary West</p> <p>Save Royton's Greenbelt Community Group</p> <p>Alan Bayfield</p> <p>David McLaughlin</p> <p>C Smith</p> <p>Jane Lester</p> <p>The Friends of Bury Folk</p> <p>Stephen Cluer</p> <p>Christopher Russell</p> <p>Woodford Neighbourhood Forum</p> <p>Philip Smith-Lawrence</p> <p>Juliet Eastham</p> <p>Elisabeth Berry</p> <p>David Brownlow</p> <p>Robert Birchmore</p> <p>Daniel Lawson</p>
JPH1_JPH1.254	<p>Susan Dennett</p> <p>Save Greater Manchester's Green Belt (SGMGB)</p> <p>Matthew Oxley</p> <p>Gary West</p> <p>Save Royton's Greenbelt Community Group</p> <p>Alan Bayfield</p> <p>Story Homes Limited</p> <p>C Smith</p> <p>Christopher Russell</p> <p>Woodford Neighbourhood Forum</p>

Row	Respondent name
	St. Helens Council Elisabeth Berry Bellway Homes Ltd Robert Birchmore Housebuilding Consortium Taylor Wimpey Daniel Lawson
JPH1_JPH1.255	Susan Dennett Matthew Oxley Gary West Alan Bayfield Pat Dainter C Smith Christopher Russell Juliet Eastham Maika Fleischer Daniel Lawson
JPH1_JPH1.256	Susan Dennett Matthew Oxley Gary West Alan Bayfield C Smith Christopher Russell Juliet Eastham Elisabeth Berry Robert Birchmore
JPH1_JPH1.257	Mike Seer Mark Walling Susan Peat Janet Alldred Gerard Tod Philip Greenwood Maurice Healy Rachel Cope Carl Simms William Deakin Joanne Walsh Jonathan Wigman Neil Campbell Anne Grennan L J Park Janet Howarth David Quincey Heather Williams Lesley Spencer Gill Pearson Susan Bunting Joanne McLeod Janet Franks

Row	Respondent name
	Gavin Wright Nicola Barnes Clive Maynock Kelly MacPherson Laura Charlotte Mary Sharkey Elizabeth Heptonstall Lindsay Connolly Janine Richardson Carol Mole Rob Shield Pamela Neilan R Nawaz Margaret Blakeley
JPH1_JPH1.258	Yvonne Imby George Clancy Elena Toader Andrew Marsden Anne Isherwood Duncan Corns Susan Seely Terence Kelly Graham Bond Stephen Kershaw Joe Heys Rahmatullah Javed Adam Birds Miriam Latham Kellen Homes Peter Buckley Stephen Hopkins

Appendix:

Respondents to PfE 2021 Policy JP-H2 Affordability of New Housing

Table 2. Row JPH2_JPH2.2

Given Name	Family Name	On behalf of company/organisation or individual
		Bowden Rugby Club
Miri	Roshni	
W R Halman		
C L Halman		
F I Carless		
J M Gibney		
		Bluemantle
Gordon	Tilstone	Thornham St John's Neighbourhood Forum
Debbie	Abrahams	
		University of Manchester Student's Union
		CCW&G
		J and B Fitton
Ann	Guilfoyle	
Janine	Ainley	
Martha	Hughes	
Jill	Neal	
Andrew	Richardson	
Janine	Ainley	
Mildred	D'Amore	
Lesley	Bardsley	

Table 3. Row JPH2_JPH2.3

Given Name	Family Name	On behalf of company/organisation or individual
Janine	Ainley	NA
Ann	Guilfoyle	NA
Glenn	Dillon	NA
Louise	Seddon	NA
Andrew	Mair	NA
John	Smith	NA
ROBERT	MAYALL	NA
Peter	Stanyer	NA
Linus	Mortlock	NA
Colin	Walters	Not applicable
Simon	Robertson	N/A
Jeff	Houghton	NA
Ann	Nutt	NA
Janine	Lawford	NA
Alan	Bayfield	Not Applicable
Alan	Sheppard	NA
E	Bowles	NA
Jane	Barker	NA

Given Name	Family Name	On behalf of company/organisation or individual
Jackie	Copley	CPRE
Jenny	Bowring	NA
D W And J	Tandy	NA
Jane	Barker	NA

Table 4. Row JPH2_JPH2.14

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Kallee-Grover	Save Greater Manchesters Green Belt
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
		PD Northern Steels
Peter and Diane	Martin	
Morris	Homes	
Gordon	Tilstone	Thornham St John's Neighbourhood Forum
Zoe	Sherlock	
Paul	Kallee-Grover	Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups
Paul	Kallee-Grover	Save Greater Manchesters Green Belt (SGMGB) - Bury Groups
Paul	Kallee-Grover	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Paul	Kallee-Grover	Save Greater Manchesters Green Belt (SGMGB) - Save Apethorn & Bowlacre
Stephen	Cluer	NA

Table 5. Row JPH2_JPH2.19

Given Name	Family Name	On behalf of company/organisation or individual
Mike	O'Brien	Story Homes Limited
Evelyn	Frearson	Woodford Neighbourhood Forum
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
		PD Northern Steels
		Prospect GB and Dobinets Regeneration
CCW&G		Countryside Properties LLP, Casey Group Ltd and Wain Homes
J and B	Fitton	
		Redrow Homes Limited
James	Stevens	HOME BUILDERS FEDERATION
		Bowden Rugby Club
Miri	Roshni	
W R Halman		
C L Halman		
F I Carless		
J M Gibney		

Given Name	Family Name	On behalf of company/organisation or individual
		Bluemantle
Andy	Collis	Gladman Developments
Bernadette	Clough	
		Royal London Asset Management RLAM
		Metacre Ltd

Table 6. Row JPH2_JPH2.34

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
		PD Northern Steels
Peter and Diane	Martin	
		Oltec Group Ltd
		Wainhomes (NW) Ltd

Table 7. Row JPH2_JPH2.42

Given Name	Family Name	On behalf of company/organisation or individual
PD Northern Steels		
Seddon Homes Ltd		Seddon Homes Ltd
CCW&G		Countryside Properties LLP, Casey Group Ltd and Wain Homes
J and B	Fitton	
		GLP Trows LLP and BDW Trading Limited
Peter and Diane	Martin	
Seddon Homes Ltd		Seddon Homes Ltd
GLP		GLP Ltd
		Royal London Asset Management RLAM

Table 8. Row JPH2_JPH2.52

Given Name	Family Name	On behalf of company/organisation or individual
		Highgrove Strategic Land Ltd
		Highgrove Strategic Land Ltd
		Steven Breheny
		Peter and Diane Martin
		Seddon Homes Ltd
		GLP Ltd
		Hollins Strategic Land

Given Name	Family Name	On behalf of company/organisation or individual
		Home Builders Federation
		Wainhomes (NW) Ltd
		Wainhomes (NW) Ltd
		Wainhomes (NW) Ltd
		Taylor Wimpey
		Redrow Homes (Lancashire)
		Peel L&P Investments (North) Ltd
		Debbie Abrahams
		Greater Manchester Housing Providers
		PD Northern Trust Asset Management
		Seddon Homes Ltd
		LQ Estates and Trafford HT
		EON Plant Ltd
		Barratt Manchester Limited
		Morris Homes (North) Ltd
		Persimmon Homes North West
		Oltec Group Ltd

Table 9. Row JPH2_JPH2.59

Given Name	Family Name	On behalf of company/organisation or individual
David	Morris	
Seddon Homes Ltd		Seddon Homes Ltd
Seddon Homes Ltd		Seddon Homes Ltd
CCW&G		Countryside Properties LLP, Casey Group Ltd and Wain Homes
J and B	Fitton	
Seddon Homes Ltd		Seddon Homes Ltd
GLP		GLP Ltd
Redrow Homes (Lancashire)		Redrow Homes

Table 10. Row JPH2_JPH2.61

Given Name	Family Name	On behalf of company/organisation or individual
		EON Plant Ltd
		Seddon Homes Ltd
		Boys & Girls Club of GM
		Miller Homes
		Barratt Manchester Limited
		LQ Estates and Trafford HT
		Story Homes Limited
		HIMOR, Redrow Homes & VHW
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
		Landowners of Holme Valley

Given Name	Family Name	On behalf of company/organisation or individual
		Oltec Group Ltd
		Redrow Homes (Lancashire)
		Crossways Commercial Estates Ltd
		Persimmon Homes North West
		Morris Homes (North) Ltd
		PD Northern Trust Asset Management

Table 11. Row JPH2_JPH2.76

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 12. Row JPH2_JPH2.77

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Janine	Ainley	NA
Bernie	Burns	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 13. Row JPH2_JPH2.78

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 14. Row JPH2_JPH2.79

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA

Given Name	Family Name	On behalf of company/organisation or individual
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 15. JPH2_JPH2.80

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 16. Row JPH2_JPH2.81

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 17. Row JPH2_JPH2.82

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 18. Row JPH2_JPH2.83

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA
Gary	West	
Alan	Bayfield	
Paul	Roebuck	
Bernie	Burns	
Joanne	Koffman	
Jenny	Lindoe	
Paul	Gilbert	
Kim	Scragg	
E	Bowles	
Samantha	Dugmore	
Julie	Halliwell	
Andrew	Wales	
Bernie	Burns	

Table 19. Row JPH2_JPH2.84

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 20. Row JPH2_JPH2.85

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 21. Row JPH2_JPH2.86

Given Name	Family Name	On behalf of company/organisation or individual
SUSAN	DENNETT	NA
Matthew	Oxley	NA
Gary	West	NA

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Bayfield	Not Applicable
C	Smith	NA
Christopher	Russell	NA
Juliet	Eastham	NA

Table 22. Row JPH2_JPH2.102

Given Name	Family Name	On behalf of company/organisation or individual
Trevor	Thomas	n/a
Mark	Walling	NA
Susan	Peat	N/a
Janet	Allred	NA
Rachel	Cope	NA
Carl	Simms	NA
Valerie	Dixon	N/A
Helen	Lomax	NA
William	Deakin	NA
Jonathan	Wigman	NA
Neil	Campbell	NA
anne	grennan	NA
L J	Park	NA
Janet	Howarth	NA
Heather	Williams	NA
Lesley	Spencer	NA
susan	bunting	NA
Joanne	McLeod	NA
Lisa	Powell	NA
Janet	Franks	NA
Gavin	Wright	NA
Clive	Maynock	NA
Kelly	MacPherson	NA
Jamie	Bentham	NA
Mary	Sharkey	NA
kaitlyn	Stockport	NA
Amanda	Parker	NA
Lindsay	Connolly	NA
Janine	Richardson	n/a
Carol	Mole	NA
Rob	Shield	NA
Halina	Clowes	NA
R	Nawaz	NA
Philip	Smith-Lawrence	NA
Juliet	Eastham	NA

Appendix:

Respondents to PfE 2021 Policy JP-H3 Type, Size and Design of New Housing

Table 23. Row JPH3_JPH3.1

Given Name	Family Name	On behalf of company/organisation or individual
		Greater Manchester Housing Providers
		Landowners of Holme Valley
		Richborough Estates
		HIMOR Group
		Hollins Strategic Land
		Rowland Homes Ltd
Alun	Davies	Hollins Strategic Land
		Wainhomes (NW) Ltd and Persimmon Homes
Andy	Collis	Gladman Developments
		Redrow Homes (Lancashire)
Nick	Graham	Peel L&P Investments (North) Ltd
John	Smith	NA
Mike	O'Brien	Story Homes Limited
		Wainhomes (NW) Ltd & Persimmon Homes
		Redrow Homes (Lancashire)
Peter and Diane	Martin	
		Highgrove Strategic Land Ltd
		PD Northern Steels
		Boys and Girls Club of Greater Manchester
Nick	Graham	Peel L&P Investments (North) Ltd

Table 24. Row JPH3_JPH3.14

Given Name	Family Name	On behalf of company/organisation or individual
CCW&G		Countryside Properties LLP, Casey Group Ltd and Wain Homes
J and B	Fitton	
Peter and Diane	Martin	
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
Miller Homes		
		Barratt Manchester Limited
EON Plant Ltd		EON Plant Ltd
		LQ Estates and Trafford HT
PD Northern Steels		
		Bowden Rugby Club
Miri	Roshni	
W R Halman		
C L Halman		
F I Carless		
J M Gibney		
		Bluemantle

Given Name	Family Name	On behalf of company/organisation or individual
		Royal London Asset Management

Table 25. Row JPH3_JPH3.39

Given Name	Family Name	On behalf of company/organisation or individual
Janine	Ainley	NA
Glenn	Dillon	NA
Anthony	Dann	NA
Trevor	Thomas	n/a
Simon	Robertson	N/A
Brenda	Foley	NA
Ann	Nutt	NA
Peter	Christie	NA
Kim	Scragg	NA

Table 26. Row JPH3_JPH3.52

Given Name	Family Name	On behalf of company/organisation or individual
CCW&G		Countryside Properties LLP, Casey Group Ltd and Wain Homes
J and B	Fitton	
Bowden Rugby Club		
Miri	Roshni	
W R Halman		
C L Halman		
F I Carless		
J M Gibney		
		Bluemantle

Table 27. Row JPH3_JPH3.89

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Ms K. Welton
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Mr D. Winterbottom

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr W. Clarke
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	The Connell Group
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Mr E. Connell

Table 28. Row JPH3_JPH3.90

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Ms K. Welton
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Mr D. Winterbottom
Alan	Chorlton	Mr W. Clarke
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	The Connell Group
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Mr E. Connell

Table 29. Row JPH3_JPH3.91

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Ms K. Welton

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Mr D. Winterbottom
Alan	Chorlton	Mr W. Clarke
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	The Connell Group
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Mr E. Connell

Table 30.Row JPH3_JPH3.100

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Ms K. Welton
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Mr D. Winterbottom
Alan	Chorlton	Mr W. Clarke
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	The Connell Group
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Mr E. Connell

Table 31. Row JPH3_JPH3.160

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Stanyer	NA

Given Name	Family Name	On behalf of company/organisation or individual
Mark	Walling	NA
Janet	Allred	NA
Carl	Simms	NA
Valerie	Dixon	N/A
Helen	Lomax	NA
Jonathan	Wigman	NA
Neil	Campbell	NA
Alan	Sheppard	NA
anne	grennan	NA
L J	Park	NA
Janet	Howarth	NA
Lesley	Spencer	NA
susan	bunting	NA
Joanne	McLeod	NA
Janet	Franks	NA
Mark	Tyldesley	NA
Clive	Maynock	NA
Kelly	MacPherson	NA
Mary	Sharkey	NA
Lindsay	Connolly	NA
Janine	Richardson	n/a
Carol	Mole	NA
Kay	Meredith	NA
Rob	Shield	NA
Halina	Clowes	NA
R	Nawaz	NA

Appendix:

Respondents to PfE 2021 Policy JP-H4 Density of New Housing

Table 32. Row JPH4_JPH4.6

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Mr W. Clarke
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Mr D. Winterbottom
Alan	Chorlton	Ms K. Welton
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	The Connell Group
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr E. Connell
		Metacre Ltd
		Peel L&P Investments (North) Ltd
		Murphy Group
		GLP Trows LLP and BDW Trading Ltd
		Seddon Homes Ltd
		Redrow Homes (Trafford)
		HIMOR Group
		Hollins Strategic Land
		Hollins Strategic Land
		Wainhomes (NW) Ltd
		Taylor Wimpey
		GLP Ltd

Table 33. Row JPH4_JPH4.15

Given Name	Family Name	On behalf of company/organisation or individual
N/A	N/A	Prospect GB and Dobinetts Regeneration
Alan	Chorlton	Mr B.H. Tomlinson
Alan	Chorlton	Mr A. Tomlinson & Mr D, Lees
Alan	Chorlton	Mr W. Clarke

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Chorlton	Mr Z. Iqbal
Alan	Chorlton	Ms D. Vick
Alan	Chorlton	Mrs Hind
Alan	Chorlton	Quantum Star Ltd
Alan	Chorlton	Mr J. Downs
Alan	Chorlton	Mr I Corbett
Alan	Chorlton	Mr and Mrs A Lord
Alan	Chorlton	Mr K. Henthorn
Alan	Chorlton	Mr S. Ingram
Alan	Chorlton	Mr and Mrs A Hegab
Alan	Chorlton	Trustees of The Summershades Trust
Alan	Chorlton	Mr D. Winterbottom
Alan	Chorlton	Ms K. Welton
Alan	Chorlton	Ms K. McAvoy
Alan	Chorlton	Tanner Bros Ltd
Alan	Chorlton	The Connell Group
Alan	Chorlton	Mr P. Haworth
Alan	Chorlton	Ms P. Lutener
Alan	Chorlton	Mr E. Connell
Paul	Williams	Morris Homes (North) Ltd
Paul	Williams	Persimmon Homes North West

Table 34. Row JPH4_JPH4.51

Given Name	Family Name	On behalf of company/organisation or individual
Miriam	Latham	NA
Debra	O'Brien	NA
Andrew	Richardson	NA
Louise	Seddon	NA
Mike	Seer	NA
Rachel	Mellish	NA
Joanne	Koffman	NA
Jill	Neal	NA
Paul	Roebuck	NA
Trevor	Widdop	NA
Miriam	Latham	NA
Andrew	Richardson	NA
Trevor	Widdop	NA
Paul	Gilbert	NA

Table 35. Row JPH4_JPH4.65

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Peter	Stratton	NA
Lorraine	Johnson	NA

Given Name	Family Name	On behalf of company/organisation or individual
Mike	Bolton	NA
Tracy	Doyle	N/a
Russell	Wood	NA
Jenny	Lindoe	NA
Helen	Lomax	NA
Jeanette	Den kaat	NA
Kim	Scragg	No
Samantha	Dugmore	NA

Table 36. Row JPH4_JPH4.82

Given Name	Family Name	On behalf of company/organisation or individual
Janet	Allred	
Natalie	Ball	
Jamie	Bentham	
Susan	Bunting	
Neil	Campbell	
Halina	Clowes	
Lindsay	Connolly	
Valerie	Dixon	
Janet	Franks	
Anne	Grennan	
Janet	Howarth	
Stephen	Kershaw	
Clive	Maynock	
Joanne	Mcleod	
Carol	Mole	
R	Nawaz	
Pamela	Neilan	
L J	Park	
Gill	Pearson	
Susan	Peat	
Lisa	Powell	
Robyn	Powell	
David	Quincey	
Janine	Richardson	
Mary	Sharkey	
Alan	Sheppard	
Rob	Shield	
Carl	Simms	
Philip	Smith-Lawrence	
Lesley	Spencer	
Peter	Stanyer	
Gerard	Tod	
Mark	Tyldesley	
Mark	Walling	
Colin	Walters	

Given Name	Family Name	On behalf of company/organisation or individual
Jonathan	Wigman	
Heather	Williams	
Tina	Chester	NA
Pamela	Neilan	NA
R	Nawaz	NA
Rob	Shield	NA
Carol	Mole	NA
Lindsay	Connolly	NA
Halina	Clowes	NA
Elizabeth	Heptonstall	NA
Janine	Richardson	n/a
Philip	Smith-Lawrence	NA
Juliet	Eastham	NA
Mark	Walling	NA
Gerard	Tod	NA
Valerie	Dixon	N/A
Natalie	Ball	NA
Carl	Simms	NA
Susan	Peat	N/a
Janet	Allred	NA
Peter	Stanyer	NA
Neil	Campbell	NA
Tracy	Doyle	N/a
Colin	Walters	Not applicable
Gill	Pearson	NA
David	Quincey	n/a
Clive	Maynock	NA
Robyn	Powell	NA
Lisa	Powell	NA
Mark	Tyldesley	NA
Janet	Franks	NA