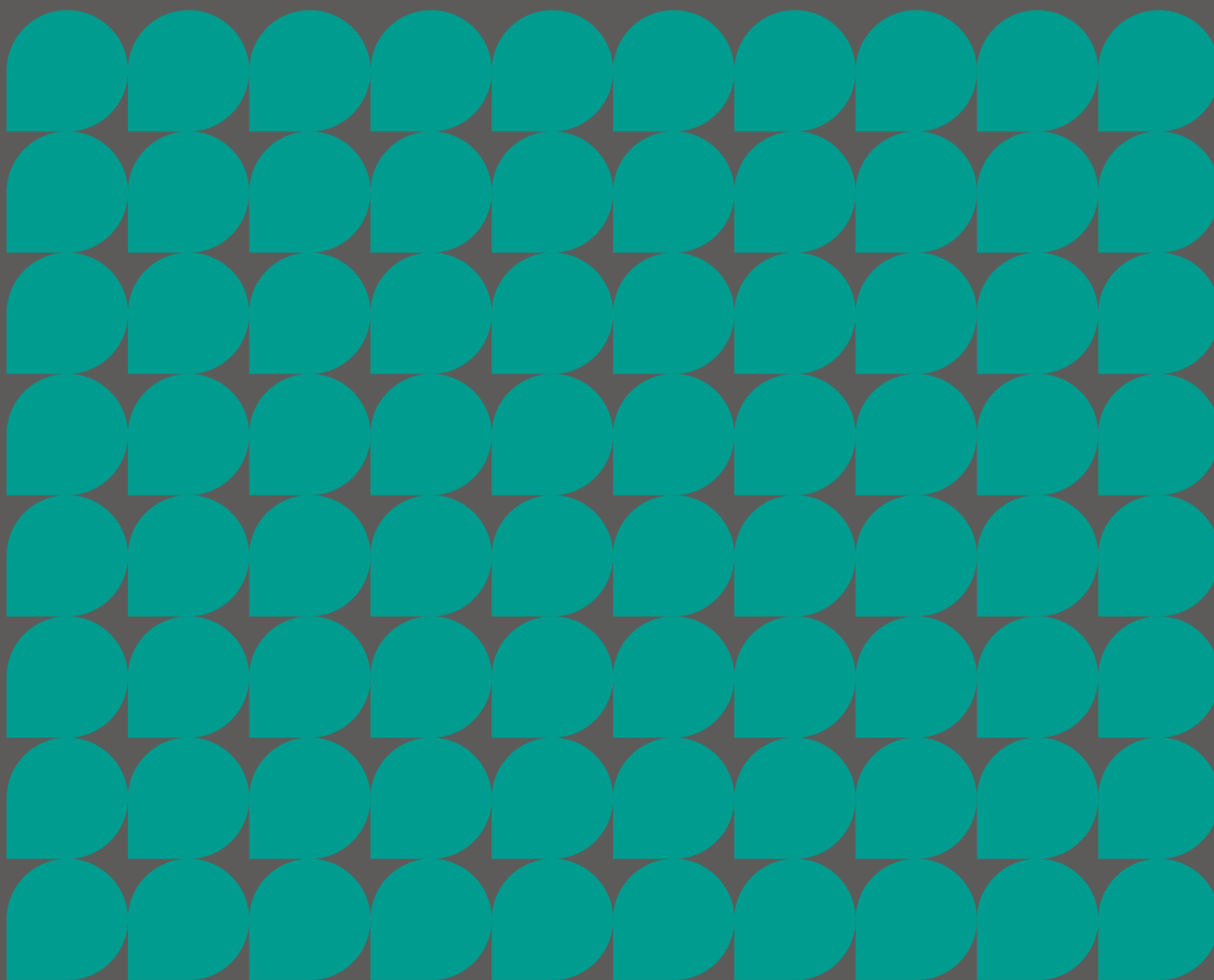


Places for Everyone

Delivering the Plan Issues Summary

February 2022



Chapter 12 – Delivering the Plan

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 12 – Delivering the Plan and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JP-D1 Infrastructure Implementation

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle		
JP-D1.1	Infrastructure services, including road, are at full capacity and without major investment, and without the use of green field and Green Belt beyond what is proposed, the developments will not be achievable.	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently (JP-S1). By working together, the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release.</p> <p>Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver the vision and objectives of the Plan. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10].</p> <p>GMCA, the Local Authorities and TfGM have a clear policy direction (JP-Strat 14) and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040 which will enable the delivery of our growth ambitions as set out in the GM Transport Strategy Appendix 1 – Right Mix Technical Note [09.01.03].</p> <p>Policy JP-C 1 supports transforming transport infrastructure and services in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity.</p> <p>Greater Manchester Transport Strategy 2040 [09.01.01] sets out our ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]. The programme of interventions set out in the Five Year Delivery Plan reflects the growth aspirations of the PfE Plan in order to support sustainable development. The allocation topic papers for each allocation set out the specific infrastructure requirements for that allocation.</p> <p>Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. It is envisaged that</p>	<p>E Bowles</p> <p>Jason Reynolds</p> <p>Robert Pearson</p> <p>Edward Beckmann</p> <p>Jennifer Davis</p> <p>Andrew Scanlon</p> <p>Vicky Harper</p> <p>Sin Yi Pang</p> <p>Stephen Woolley</p> <p>Mike Bolton</p> <p>Kelly Baker</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		further multi-year infrastructure funding settlements will be awarded in future years over the course of the PfE Plan period.	
JP-D1.2	Within Bury the infrastructure is not sufficient to accommodate so many new people.	<p>The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits from access to public transport) as set out in the Existing Land Supply and Transport Technical Note [09.01.05] and associated addendum [09.01.06].</p> <p>All allocations policies include measures to deliver sustainable transport infrastructure and public transport accessibility and mitigate highways and other impacts where appropriate. Allocations policies are informed by an assessment of cumulative impacts through the respective Transport Locality Assessments [09.01.07 through to 09.01.28] which concluded that the potential impacts of the allocations on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p>	David Almond
D JP-1.3	The policy falls significantly short of the requirements of the NPPF around infrastructure.	<p>A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P5, JP-P6 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.</p> <p>For development of the allocations, the Transport Locality Assessments [09.01.07 through to 09.01.28] set out the required transport infrastructure improvements for each allocation that are necessary, or would support, the allocation in order to mitigate the impact of development.</p> <p>Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the allocations.</p>	Taylor Wimpey
JP-D1.4	There is support for GMCA to use Mayoral Development Corporations, Local Development Orders, compulsory purchase and other powers to support development delivery and assist site assembly.	Support noted	Peel L&P Investments (North) Ltd
JP-D1.5	The PfE must make clear the circumstances in which use of public sector powers of Development Corporations or CPO would be used.	The use of Compulsory Purchase Orders is prescribed in legislation. It is not appropriate to repeat this in this plan.	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D1.6	Strategies must be treated with a degree of flexibility. The proposed approach to infrastructure funding and delivery cannot be defined, particularly in the case of outline or hybrid applications where matters of detail are reserved.	A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P5, JP-P6 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Policy JP-C 7 sets out the transport requirements of new development. Applications for planning permission will need to comply with the requirements of the policy. All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the allocations.	Peel L&P Investments (North) Ltd
JP-D1.7	Infrastructure should be directly related to the proposed development as mitigation. Alternative wording has been provided.	All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the allocations. No change is considered necessary.	Northern Gateway Development Vehicle
JP-D1.8	Broadly support the proposed approach to infrastructure implementation.	Support noted.	Peel L&P Investments (North) Ltd
JP-D1.9	If the actions proposed lie outside the scope of the PfE, unclear why they are included in the PfE policy.	It is unclear which actions this refers to.	Jane Barker
JP-D1.10	Infrastructure plans should be agreed alongside the PfE. It is not sufficient to say they will be required.	A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P5, JP-P6 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Policy JP-C 7 sets out the transport requirements of new development. Applications for planning permission will need to comply with the requirements of these policies. All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the allocations.	Karen Shreeve
	Funding / Delivery		
JP-D1.11	There is no allowance for the current restriction on pooling S106 obligations / potential for Strategic Infrastructure Tariffs. The plan significantly underestimates or fails to consider the cost of	A Strategic Viability Assessment Stage 1 was undertaken in accordance with the 2019 revised National Planning Policy Framework and the relevant sections of the Planning Practice Guidance (PPG). An Addendum was prepared to update the assessment in the light of the Stockport withdrawal and to review the assumptions in the light of Covid 19. [03.01.01-03.01.03]	Taylor Wimpey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	providing a number of infrastructure requirements such as education and social infrastructure. Until a more comprehensive viability assessment, which considers the full costs of these requirements is undertaken, the plan is unsound.	The VASF follows the industry-standard approach of comparing the residual value of different types of development with a notional benchmark land value and is considered to be a robust, widely accepted methodology.	
JP-D1.12	The PfE is not accompanied by an Infrastructure Delivery Plan to demonstrate how the infrastructure needs have been determined for each of the strategic sites and how the needs will be funded and delivered.	Infrastructure Delivery Plans are not required by NPPG. NPPF states that 'all plans should promote a sustainable pattern of development that seeks to:align growth and infrastructure' (paragraph 11a). PfE provides an appropriate framework for delivery and has been informed by discussions with strategic infrastructure providers as set out in the Delivery Topic Paper [03.01.05] Allocation policies set out the required infrastructure and have been subject to a Viability Assessment [03.01.04] . Further details can be found in the individual Allocation Topic Papers.	Taylor Wimpey
JP-D1.13	Does not object in principle that the policy proposes to establish a new long-term funding mechanism for transport infrastructure, and there are clear parameters in the NPPF and PPG about how this can be achieved.	Noted.	Peel L&P Investments (North) Ltd
JP-D1.14	The plan needs to identify how the required infrastructure will be paid for, with clear delivery plans for infrastructure included.	A number of policies in the Plan provide the policy framework to address this matter, such as Policies, JP-G6, JP-G9, JP-P1, JP-P5, JP-P6, JP-P7, JP-C1-7. JP- D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Allocation policies set out the required infrastructure and have been subject to a Viability Assessment [03.01.04] . Further details can be found in the individual Allocation Topic Papers. Greater Manchester Transport Strategy 2040 [09.01.01] sets out our ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] . Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. It is envisaged that	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>further multi-year infrastructure funding settlements will be awarded in future years over the course of the PfE Plan period.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	
JP-D1.16	A lack of clarity about the funding mechanism proposed and no evidence about its impact on development viability.	<p>A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Applications for planning permission will need to comply with the requirements of these policies. All allocations policies include measures to deliver sustainable transport infrastructure, heath, education and green space provision where appropriate.</p> <p>Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the policies in the plan.</p>	Peel L&P Investments (North) Ltd
JP-D1.17	Unclear why the funding mechanism is proposed when there is already an appropriate mechanism available in the form of planning obligations secured via S106 of the Town and Country Planning Act 1990.	Paragraph 12.1 identifies that delivering our ambitions will be challenging and will require substantial amounts of investment from the public and private sector. All mechanisms for delivery will be considered, including but not exclusively, planning obligations.	Peel L&P Investments (North) Ltd
JP-D1.18	Support the criteria of Policy JP-D1 which are relevant to the delivery of the JPA1.2 in terms of approach to phasing and / or delivery of major supporting infrastructure.	Noted	Northern Gateway Development Vehicle
JP-D1.19	In the policy there is uncertainty regarding infrastructure delivery and the need for further support, as yet unspecified. Concerns that the plan can be submitted as sound in these circumstances.	<p>The Plan is considered sound in that a number of policies in the PfE Plan provide the policy framework to address infrastructure matters, such as Policies, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Applications for planning permission will need to comply with the requirements of these policies. All allocations policies include measures to deliver sustainable transport infrastructure, heath, education and green space provision where appropriate.</p> <p>Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the policies in the plan.</p>	Rosedale Property Holdings Limited

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D1.20	Concern that the phasing of the infrastructure and property development needs to be agreed with the key stakeholders and this hasn't been done.	Allocation Topic Papers set out the proposed approach to phasing of infrastructure and development. . PfE provides an appropriate framework for delivery and has been informed by discussions with strategic infrastructure providers as set out in the Delivery Topic Paper [03.01.05]	Catherine Poulton
JP-D1.21	Due to the size of the greenbelt sites allocated within the plan it is unlikely that the infrastructure can be provided in time to bring these sites forward within the plan period, making the plan unsound.	Allocation policies set out the required infrastructure [03.01.04] and have been subject to a Strategic Viability Study. Further information is provided in the individual Allocation Topic Papers. It is considered that the trajectories set out in the Allocation Topic Papers and summarised in the Housing Topic Paper [06.01.03] are realistic and deliverable	See Appendix.
JP-D1.22	The infrastructure phasing and delivery strategies are not justified or effective for smaller and self-contained sites. The PfE should establish a threshold below which such strategies are not required. Recommends a threshold of 1,000 dwellings or 100,000 sqm floorspace.	The Plan is considered sound in that a number of policies in the PfE Plan provide the policy framework to address infrastructure matters, such as Policies, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Applications for planning permission will need to comply with the requirements of these policies. All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate. Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability of mitigation for the policies in the plan.	Peel L&P Investments (North) Ltd
JP-D1.23	Support the criteria of Policy JP-D1 which are relevant to the delivery of the JPA1.1 in terms of approach to phasing and / or delivery of major supporting infrastructure.	Noted	Peel L&P Investments (North) Ltd
JP-D1.24	Supports the value of infrastructure phasing and delivery strategy for very large developments. However, they are dependent upon early collaboration and inputs from infrastructure providers and deliver partners. The delays experienced in securing these inputs can result in extended lead-in times. LPAs must play a role in facilitating collaboration in order to prevent unnecessary delays to delivery.	Policy JP-D1 makes it clear that a long term strategic approach to place shaping involving collaboration with infrastructure providers and delivery partners is essential. The Delivery Topic Paper [03.01.05] outlines the arrangements that Greater Manchester is putting in place, including the Strategic Infrastructure Board and bilateral agreements to ensure that relationships are in place to support delivery of the plan.	Peel L&P Investments (North) Ltd
	Transport / Road Network		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D1.25	There is a lack of a suitable road network, and access to most services (shops, doctors, chemists and hospitals).	The policies in the Connected Places chapter of the Plan provide a sufficient policy framework to support the creation of a better integrated network, with policies JP-C1, JP-C4 and JP-C7, in particular, ensuring new developments are well integrated into the network.	Sin Yi Pang
JP-D1.26	Rail services need improving, including better stock.	Transforming transport infrastructure and services by securing investment in new and improved transport infrastructure and services is a key component of Policy JP-C 1 in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity. An ambitious programme of investment in public transport is set out through the Greater Manchester Transport Strategy 2040 [09.01.01] and accompanying Our Five Year Transport Delivery Plan 2021-2026 [09.01.02] . This includes proposed investment in rail and bus capacity, coverage and service quality.	George Hardie
JP-D1.27	Support that the requirements of PPG are satisfied in relation to allocations. Note that work has been carried out to identify the transport infrastructure necessary for each allocation and additional infrastructure required has been identified through technical assessment work.	The PfE Site Allocation Process Site Selection Background Paper [03.04.01] outlines the process followed to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in Appendix 6 Site suitability methodology [03.04.08] . The Transport Locality Assessments [09.01.07 through to 09.01.28] analyse the impact of each allocation on the local transport network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. Strategic Viability Assessments [03.01.01 – 03.01.04] have been published alongside the PfE Plan to demonstrate viability.	Peel L&P Investments (North) Ltd
	Social Infrastructure		
JP-D1.28	Concern that more educational facilities will be required for all the new developments proposed to meet the demand for school places.	Within the PfE Plan, Policy JP-P 5 considers provision for Education, Skills and Knowledge including sufficient delivery of school places. For each allocation policy there is reference to the need for provision for schools where applicable. The Plan should be read as a whole, therefore no change is considered necessary	Sin Yi Pang Stephen Woolley Mike Bolton Kelly Baker Deborah Foulkes Alison Doherty

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D1.29	Infrastructure will fall behind no access to medical services, education, roads, transport etc. Some areas already have limitations of services.	A number of policies in the PfE Plan provide the policy framework to address infrastructure matters, such as Policies, JP-G6, JP-G9, JP-P5, JP-P6, JP-P7 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. Policy JP-C1 recognises the need to deliver sustainable patterns of development and Policy JP-C7 sets out the Transport Requirements of new development, requiring development of the site to incorporate mitigation to reduce the need to travel and reliance on cars. Applications for planning permission will need to comply with the requirements of these policies. All allocations policies include measures to deliver sustainable transport infrastructure, health, education and green space provision where appropriate.	Kim Scragg
JP-D1.30	No evidence of plans agreed with NHS to add extra capacity for health facilities.	The Duty to Co-operate statement sets out our strategic engagement with the NHS. Policy JP-P6 and individual allocation policies address the issues of health provision.	Stephen Woolley Paul Roebuck Deborah Foulkes Diane Perkins Alison Doherty
JP-D1.31	Difficulty already experienced finding a dentist and getting a medical appointment can take significant time.	See Row D1.30	Laura Charlotte Kelly Baker
	Consultation / Joined up approach		
JP-D1.32	Poor public consultation, a lack of accessible information and little spent by councils in generating awareness of PfE. Interest in the plan has mainly been generated by local protest groups.	Not relevant to this policy. Matter addressed elsewhere	C Smith Robert Birchmore
JP-D1.33	Difficult to have a coordinated approach with the boroughs, infrastructure providers, national government, regulators and others involved in infrastructure planning and funding to ensure the infrastructure needed to support the vision and objectives of the plan is developed and implemented effectively, when Stockport isn't involved.	Greater Manchester has a good track record of delivering ambitious infrastructure programmes as set out in the Delivery Topic Paper [03.01.05] . Stockport is still part of the Combined Authority and will work with the other 9 boroughs to deliver strategically important infrastructure.	Jacqueline Charnock

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D1.34	People/authorities have proved themselves unable and with no intent of delivering the coordinated approach detailed.	Greater Manchester has a good track record of delivering ambitious infrastructure programmes as set out in the Delivery Topic Paper [03.01.05]	Ian Culman
JP-D1.35	Historic England has an important role in the delivery of infrastructure, particularly heritage assets of national importance.	The historic environment is addressed primarily in Policy JP-P2.	Historic England
JP-D1.36	Support that the policy wording recognises the requirement for collaborative investment plans to support major supporting development, an approach will be key to help deliver cross-border strategic allocations JPA1.1 and JPA1.2.	Noted	Northern Gateway Development Vehicle
JP-D1.37	There is support for the ideas and sentiment, but a need to understand how it is going to work for local people.	PfE is a strategic plan which will set the framework for more detailed work through local plans. Allocation policies set out the infrastructure requirements where appropriate. Further detail can be found in Allocation Topic Papers.	Ann Guilfoyle
JP-D1.38	NGDV have been working with the GMCA Infrastructure Board in relation to the Northern Gateway and look forward to continuing this positive working relationship with stakeholders to develop the plans for the site.	Noted	Northern Gateway Development Vehicle
JP-D1.39	Local Planning authorities should encourage collaboration immediately and prior to the adoption of PfE in order to shorten development lead-in times and facilitate early delivery.	Noted	Peel L&P Investments (North) Ltd
JP-D1.40	The work carried out should include engagement with Government, infrastructure providers, developers and landowners to identify the infrastructure and investment required to secure sustainable growth in GM.	Greater Manchester is working with Government across a range of initiatives and funding sources as set out in the Delivery Topic Paper [03.01.05]	Peel L&P Investments (North) Ltd
	Utilities		
JP-D1.41	Utilities are barely mentioned in the plans. These are fundamental to the whole concept.	Policy JP-D1 makes it clear that a long term strategic approach to place shaping involving collaboration with infrastructure providers and delivery partners is essential. The Delivery Topic Paper [03.01.05] outlines the arrangements that Greater Manchester has already in place,	David Almond

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		including the Strategic Infrastructure Board, is developing with infrastructure providers, for example bilateral agreements, to ensure that relationships are in place to support delivery of the plan.	
JP-D1.42	Collaboration is needed to ensure that utilities infrastructure is planned and delivered in a coordinated way, such that any obstacles to delivery are removed. Policy JP-D1 should be amended accordingly.	Policy JP-D1 makes it clear that a long term strategic approach to place shaping involving collaboration with infrastructure providers and delivery partners is essential. The Delivery Topic Paper [03.01.05] outlines the arrangements that Greater Manchester has already in place, including the Strategic Infrastructure Board, is developing with infrastructure providers, for example bilateral agreements, to ensure that relationships are in place to support delivery of the plan.	Peel L&P Investments (North) Ltd
JP-D1.43	Utility providers have a statutory requirement to maintain utilities networks, including by addressing infrastructure capacity problems and accommodating planned growth. PfE goes beyond the remit of a Development Plan and places a disproportionate and unnecessary burden on the development industry.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12, JP-D1, JP-D2 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.	Peel L&P Investments (North) Ltd
JP-D1.44	The plan assumes supply of minerals and gives no consideration to the resource requirements and supply chain considerations.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted.	Mineral Products Association
	Allocation specific		
JP-D1.45	The Topic Paper supporting the Simister and Bowlee allocation states in paragraph 11.1 that extensive infrastructure investment, including a wide range of public transportation enhancements, is required to ensure its implementation. This highlights that the site is unsustainable in its current state. As a result, the site is unsuitable for allocation.	It is considered that there is a case for exceptional circumstances to release the Simister and Bowlee site which can be found in the relevant Allocation Topic Paper. See also responses to JPA1.2	Simister Village Community

PfE 2021 Policy JP-D2 Developer Contributions

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D2.1	PfE districts have a poor success rate in obtaining developer contributions. Tax payers shouldn't be funding developments.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.	Alan Sheppard Judith Sheppard Susan Dennett Daniel Lawson Gary West Alex Abbey Graham Roberts David Mclaughlin Diane Wright Robert Birchmore
JP-D2.2	Developers are not held to account when they do not make the necessary contributions to approved schemes.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.	See Appendix.
JP-D2.3	PfE districts are working with developers at the expense of local people.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.	Kim Scragg Janet Taylor Maureen Buttle Ann Guilfoyle Tracy Raftery
JP-D2.4	The Plan should contain more detailed information regarding Developer Contributions.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.	Julie Halliwell Martin Rigby C Smith Peter Christie
JP-D2.5	All developments including windfall should make a fair contribution towards infrastructure. Greater requirements should not unfairly be placed on allocated sites.	No change considered necessary. The policies in the plan apply to all new development not just the site allocations, where appropriate. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-D2.6	The policy should be amended to also allow for new evidence to justify a detailed viability assessment to be undertaken. PfE should also be clear about the mechanisms used to secure contributions and remove reference to the potential for a Strategic Infrastructure Tariff.	The proposed modification is not considered necessary. Strategic viability assessments [03.01.01 - 03.01.04] have been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.	Peel L&P Investments (North) Ltd
JP-D2.7	The policy text should highlight NPPF para.56. Concerns are raised over the Strategic Viability work undertaken to support the plan. <ul style="list-style-type: none"> Assumptions made about costs, values and profit levels Lack of transparency in appraisals in relation to typologies and PfE policy requirements 	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. A Strategic Viability Assessment Stage 1 was undertaken in accordance with the 2019 revised National Planning Policy Framework and the relevant sections of the Planning Practice Guidance (PPG). An Addendum was prepared to update the assessment in the light of the Stockport withdrawal and to review the assumptions in the light of Covid 19. [03.01.01-03.01.03] A Strategic Viability Stage 2 report was undertaken [03.01.04] in relation to the allocated sites. It is considered that a proportionate evidence base has been provided to support the policy. The Delivery Topic Paper provides a strategic summary outlining how viability has been considered. The paper can be found here: Delivery Topic Paper [03.01.05] .	Northern Gateway Development Vehicle Peel L&P Investments (North) Ltd
JP-D2.8	To avoid 'double dipping' the policy needs to state that contributions will only be sought for items on the CIL Reg 123 list, where the request meets the Reg 122 tests.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.	GLP Trows LLP and BDW Trading Ltd Seddon Homes Ltd
JP-D2.9	The policy should accord with national policy and set out what development contributions developers are expected to contribute towards.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan, including the site specific allocation policies is considered to be consistent with NPPF and NPPG.	Taylor Wimpey
JP-D2.10	Infrastructure impacts are being ignored.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P5 and JP-P6 which state that new development must be	E Bowles Simon Haughton

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	
JP-D2.11	The plan should have been planned at a local level with local communities.	Comment not relevant to the content of the Chapter 12.	John Williams
JP-D2.12	PfE makes no mention of specific industries or partners for employment provision.	Comment not relevant to the content of the Chapter 12. Matter addressed elsewhere.	Mat Burbery

Appendix:

Respondents to PfE 2021 Policy JP-D1

Table 1. Policy JP-D1 additional respondents

Row	Respondent name
JP-D1.14	Lisa Mather
	Peter Mather
	Deborah Morgan
	Susan Higgins
	Andrea Keeble
	Oscar Majid
	Juliet Eastham
	Yvonne Robinson
	Catherine Schofield
	Stuart Johnstone
	Susan Fleming
	Andrew Fleming
	Tom Wood
	Viv Barlow
	Michelle Mcloughlin
	Joan Glynn
	Jacqueline Majid
	S Stratton
	Hazel Keane
	John Robinson
	Colin Heaton
	Susan Horridge
	Shirley Buckley
	Joanne Dawson
	Joanne Culliney
	Barry Spence

Row	Respondent name
	Christopher Culliney
	Annmarie Bennett
	George Wood
	Rebecca Robinson
	Daniel Robinson
	Alexandra Saffer
	Derek M Glynn
	Carole Martin
	Geoff Woods
	Carolyn Saffer
	Saul Bennett
	Samantha Doggett
	Colleen Donovan-Togo
	Lucy Taylor
	Angela Shaw
	Paul Taylor
	Aimee Shaw
	Jennifer Cronin
	Barbara Cooke
	Lorraine Tucker
	Brian Cooke
	Lisa Wright
	Sheila Jackson
	Sara Slater
	Abby Derere
	Brian Wright
	Kelly Fox
	Paul Yarwood
	Craig Tucker
	Victoria Hothersall
	Adam Burgess

Row	Respondent name
	Jacqueline Yarwood
	Alan Bayfield
	Anna Katherine Burgess
	Debbie Pownceby
	Rebecca Hindle
	Marjorie Higham
	Gwynneth McManus
	Gwyneth Derere
	Nicola Kerr
	Julia Gallagher
	Andy Skelly
	Alison Lees
	Joanne Dallimore
	Matthew Oxley
	Emma Nye
	Kath Dobson
	Leanne Labrow
	Maika Fleischer
	Mat Burbery
	Alex Abbey
	Martin Rigby
	Doug Kirkpatrick
	Caroline O'Donnell
	Mary Walsh
	G R Walsh
	Carole Heed
	Climate Action Bury
	Anthony Heed
	Pamela Maxon
	Alexandra Cluer
	Dawn Johnstone

Row	Respondent name
	Trevor Widdop Judith Howard Patricia Cooke Jackie Harris Elisabeth Berry Ian Culman Susan Dennett Daniel Lawson Gary West Natasha Cross Diane Wright C Smith Robert Birchmore
JP-D1.21	The Friends of Bury Folk Janine Richardson Carol Mole Julie Darbyshire Christopher Russell Donna Nuttall Susan Tunstall Barbara Wilkinson Kathryn Russell Stephen Cluer Lucy Marsden Trevor Byrne Andrea Booth Michael Brooks Cathy Armstrong-Bell Janet Jones Juliet Eastham

Respondents to PfE 2021 Policy JP-D2

Table 2. Policy JP-D2 additional respondents

Row	Respondent name
JP-D2.2	Ian Culman
	Jane Lester
	Nigel Morrell
	Kath Godfrey
	Laura Charlotte
	Janine Richardson
	Carol Mole
	Julie Darbyshire
	Natasha Cross
	Christopher Russell
	Deborah Lynch
	Donna Nuttall
	Susan Tunstall
	Barbara Wilkinson
	Kathryn Russell
	Jane Barker
	Stephen Cluer
	Lucy Marsden
	Trevor Byrne
	Andrea Booth
Michael Brooks	
Cathy Armstrong-Bell	
Janet Jones	
Juliet Eastham	
Danny Lyle	