

<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Stakeholder Submission
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Our Vision
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Sound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Residents support the overall objectives and principle of the Vision as laid out , but do not consider that this has been duly reflected and promoted within the provisions of the draft Plan. For example, given the extensive release of Green Belt land it may be difficult to secure a flourishing natural environment, the lack of focus on remediating and developing derelict and vacant urban sites could undermine the aspiration to secure places where people live healthy lives.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	We task that the aspirations laid out within the Vision be duly reflected with the draft Plan, policies and allocations and a coherent and consistent voice given to the protection of the Green Belt and wider environment.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Our Strategic Objectives

<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Objective 1 - Meeting our Housing Need - For the reasons set out within this consultation response there are legitimate concerns in relation to the robustness of the evidence base and the lack of clarity in relation to the potential for additional sites to come forward (1) once the Stockport area need has been confirmed and (2) when the Plan is inevitably revised shortly after adoption. Further, the Plan would appear to be unreasonably ambiguous when it comes to confirming the OAHN, for example table 7.1 would appear to indicate a need for 190,752 but from 2020 to 2037, where draft policy JP-H1 states a minimum of 164,880 net additional dwellings from 2021-2037 set against a forecast population growth over the plan period of 158,000. Again, this lack of clarity and consistency falls to the soundness of the Plan and as drafted, it is simply too ambiguous and inconsistent, and the Plan needs to be modified to show one clear and consistent OAHN figure;</p> <p>Objective 2 - Create Neighbourhoods of Choice - it is noted that this objective sets out a priority for the use of brownfield land, to focus new homes on the Core Growth Area and town centres, to focus development within 800m of public transport hubs, no increase in homes and premises at a high risk of flooding and prioritise sustainable modes of transport. As set out in detail at Sections 5 and 7 of this consultation response, the GMCA are failing</p>

to secure development which adheres to these principles, and as such it is clear that this objective of the Plan will not be met. This raises issues in relation to soundness with a focus on the effectiveness of the Plan and whether it has been robustly justified;

Objective 3 - Ensure a Thriving and Productive Economy in all Parts of Greater Manchester - Once again it is noted this objective focuses on development of brownfield sites, ensuring adequate development land to meet the employment needs and securing a diverse range of employment sites and premises. However, the Plan as drafted has paid no regard to the impact on employment needs and growth patterns as a direct consequence of the Covid-19 pandemic. Furthermore, we have not seen evidence as to how the GMCA are providing for a diverse range of employment needs, and in locations which the Plan itself identifies as a focus for growth, which is well served by new homes and potential staff.

Objective 6 - Promote Sustainable Movement of people, goods and information - For the reasons laid out within this detailed representation and those put forward by third parties, the draft Places for Everyone report is not sustainable. The Plan is proposing sites for allocation in areas not well located for access to local services and facilities, and a number which are not well related to existing settlements. Sites are proposed in areas at risk from flooding, and a number with poor access to public transport connections. The Plan as drafted cannot therefore be deemed to be sound and needs to be duly amended to secure the right development in the right places, namely those outside of the Green Belt with good public transport connections, in areas well related to existing settlements and services, and not in areas at risk from flooding or which have significant environmental impact. If the GMA re-assess the reasonable alternatives in relation to land within the main urban areas, it is apparent that the needs of the region can be met more suitably and sustainably to ensure the tests of soundness can be met, and without the need to release land from the Green Belt;

Objective. 7 - Ensure that Greater Manchester is a more resilient and carbon neutral city-region - It is noted that the GMCA propose to promote carbon neutrality by 2028, sustainable patterns of development, reduce car dependency etc. As detailed throughout this report there are concerns that in reality the Plan does not focus development in the right place, in areas with good access to public transport and with a joined up approach to jobs and housing delivery to limit the need to travel. The plan sets out good objectives and commitments on the environment, but sadly the draft policy framework and proposed allocations are not consistent with the same. The Plan is therefore

	<p>incoherent and ineffective, and by virtue unsound. We therefore ask that the Plan be modified to ensure that the impact of development on the environment runs through each policy and allocation as a key issue;</p> <p>Objective 8 - Improve the Quality of Our Natural Environment and access to Green spaces - By simply not providing sufficient protection of Green Belt land, by proposing development in areas at high risk from flooding, and the proposed levels and scale of development with associated impacts on ecology, biodiversity and wider environment, it is clear that PfE will cause harm to green spaces, and will reduce people"s access to outdoor spaces in total conflict with objectives 7 and 8. The PfE clearly needs to be reconsidered. The lack of specific reference to protecting Green Belt land as an objective is also of significant concern.</p>
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Our Spatial Strategy
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgedpdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	We have had regard to the Strategy section of the draft Plan and would advise that the comments as set out below and throughout this report set out the clear concerns the local community has with the strategy as currently presented by the GMCA, and its ability to meet the plan objectives and meet the needs of the community.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The Plan as drafted is in parts inconsistent with the strategy and plan objectives, and this needs to be addressed in order for the Plan to be found sound and effective.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 1 Core Growth Area
<b>Agent Company / Organisation</b>	Leith Planning Ltd

Type	Web
Include files	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The SGMGB Action Group, support the provisions and principles of the above policy in relation to siting employment and housing needs in sustainable locations if it was seen to be being reflected within the sites being proposed for development. However, the P/E Plan as drafted proposes a number of sites in unsustainable locations, with poor access to local transport, at risk from flooding and with no inter-connectivity between homes and employment opportunities.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Given the change in the character of our High Streets we would ask that the GMCA go back and review the development potential of these major centres for mixed use employment and residential schemes, as well as other urban locations which are well located for transport and service access, and which can assist in removing the need to develop within the Green Belt. This will also ensure a sound plan which is consistent, coherent, and justified.
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)
Person ID	1287356
Title	JP-Strat 2 City Centre
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA

<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	We welcome and support the focus on the development within the city centre and the newly proposed increase in the number of homes within this area from that proposed within the GMSF 2020. However, (1) the plan period has been incorrectly stated within the policy, which is clearly just a typing error which has not been corrected from the earlier draft and (2) the focus on not displacing the area's non-residential function whilst understood, does not appear to reflect current lifestyle and behavior changes with more people shopping online. This change in character will have an impact on the scale of employment and housing schemes which can now come forward within the city centre and should be being further promoted given the sustainable credentials of the main urban area
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	We therefore ask that in order to ensure an effective and positively prepared Plan, that the GMCA revisit the ability to develop within the core urban locations.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 5 Inner Areas
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Once again it is noted that the plan period is incorrectly detailed within the policy. Furthermore, whilst the wording of the policy appears to support using development to regenerate and reduce deprivation within the inner areas, the fact that significant levels of growth will take place within the outer areas, and insufficient consideration has been given to the development of brownfield sites, and increased densities within the main urban areas, the Plan would appear to be somewhat incoherent and inconsistent. The Plan sets out a clear approach to focus development within the urban area and on brownfield sites, however, there remains a significant area of Green Belt release being proposed, and we are of the view that as

	<p>drafted such an approach has not been sufficiently justified, nor does it secure a coherent and sound plan which is consistent with national guidance. As set out within the Inspectors Report associated with joint plan in Bath and Somerset it is essential that sites proposed for allocation are robustly justified, and alternatives correctly examined.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>We therefore ask that the GMCA re-assess the potential for reasonable alternatives and delete sites proposed for allocation within the Green Belt.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>
<p><b>Title</b></p>	<p>JP-Strat 6 Northern Areas</p>
<p><b>Agent Company / Organisation</b></p>	<p>Leith Planning Ltd</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>  <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a>  <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a>  <a href="#">PFE1287356_TimperleyWedgepdf</a>  <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>NA</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>NA</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>We would draw attention to a simple typographical error in relation to the wording of policies GM-Strat-7 and GM-Strat-8, which should now read JP-Strat-7 and JP-Strat-8. Furthermore, the policy would appear to be inconsistent in its approach by prioritising the re-use of brownfield land, but also setting out the release of Green Belt land. Clarity is therefore sought that the sites being prioritised for regeneration are being effectively and efficiently developed, that all brownfield sites within the urban area have been reviewed and proposed for development in advance of Green Belt sites and how the Green Belt sites proposed for release can be found to be key locations.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Without a clear demonstration of the same, the proposals within the policy to support the northern authorities is simply a statement with no clear action on how these areas will be regenerated, which simply cannot be achieved if large tracts of derelict and brownfield land are not brought forward for development.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>

<b>Title</b>	JP-Strat 7 North East Growth Corridor
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgedpdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>In addition to the correction required to the plan period referred to within the policy (and further addressed at Draft Policy JP-J 1), residents are concerned that the northeast corridor is being asked to accommodate an unsuitable, unsustainable and unreasonable level of development over the plan period. The scale of development being proposed will wholly alter the character of the local area and have direct impact on local communities in terms of integration, access to services, facilities traffic congestion etc. The strategic sites have been assessed in more detailed at Section 7, but in all reality require the loss and removal of extensive tracts of Green Belt land and will result in coalescence of settlements to the detrimental of the local area.</p> <p>Oldham and Rochdale already account for around a quarter of warehousing in Greater Manchester. The North-East Growth Corridor may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway and Stakehill. It seems that this is being dictated not by actual need in the North of Greater Manchester, but by the desire to outsource the demographic/geographic problems of the boroughs in the South of Greater Manchester. As such Oldham and especially Rochdale would be tying themselves to the economic needs of the southern boroughs.</p> <p>It is also unclear whether the site at High Crompton will be delivering development over and above that set out within the policy, and how reference can be made to this site if it is not proposed for release at this stage. PFE as drafted would appear to indicate</p>



	that the site will be released from the Green Belt within the Oldham Local Plan, regardless of the fact it is not addressed in detail within the regional plan. The lack of clarity as to what would constitute it being necessary for release is also of concern. In reality on the basis of the information currently available, the land should be retained within the Green Belt.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	As drafted the policy is unduly ambiguous and weighs unreasonably in favour of land release and not land protection. The policy is therefore deemed to be unsound as it has not been sufficiently justified. To address the test of soundness we would suggest that draft policy JP-Strat 7 be deleted, alongside Draft Allocations JPA1.1 and JPA 2. Further, that Draft Allocation JPA 1.2 be reviewed.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 8 Wigan Bolton Growth Corridor
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgedpdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Once again attention is drawn. To the plan period reference, and it remains of concern that the GMCA are proposing to release land from the Green Belt in order to support the success of a growth corridor, as opposed to simply representing good and justified planning. In our view such a stance would not meet the tests required to demonstrate exceptional circumstances, nor is this an approach supported within the NPPF.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	We would therefore ask that the GMCA carefully consider the proposed allocation and in reality, to focus once again on sites within the urban area which are better placed to meet housing and employment needs.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 9 Southern Areas

<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Draft Policy JP-Strat-9 is noted to fail to make clear commitments in relation to the level of new development proposed within this area. Given the focus on improved transport links, connectivity, and a focus on enhancing access to employment, the GMCA should set out within the policy the proposed level of housing within this location. The reference to selective release of Green Belt land does not provide certainty and clarity to residents as to how sites have been assessed and identified, nor how such release then corresponds with the focus on prioritising the re-use of brownfield land. As it stands the policy is ineffective and unjustified and is therefore unsound.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	We support the importance of promoting the role of town centres, and in fact would go further and set out how such key locations could support overall levels of growth and delivery, given their sustainable nature. We also believe that such an approach should be being put forward across the board, and not simply in relation to this part of Greater Manchester. This would demonstrate a more cohesive and consistent approach to site identification and would demonstrate and support the commitment of the GMCA to the delivery of brownfield sites and the protection of the Green Belt.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 10 Manchester Airport
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound

<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Once again there are concerns with the extent of Green Belt release being proposed within the plan, and whether this has been suitably justified. Further, that the sites identified for development are suitable and sustainable.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	For these reasons the draft policy is deemed to be ineffective and fails to adhere to national policy and should therefore be deleted.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 11 New Carrington
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	It is noted that GMCA are proposing a further large-scale allocation at New Carrington, which will, like many others proposed alter the character of the locality. We recognise that the GMCA are proposing major investment in active travel, public transport, and highway infrastructure, such as the Carrington Relief Road, improvements to Junction 8 of the M60 and public transport corridors to support the development, however it is noted that such investments are required to ensure the development is well connected with the rest of Greater Manchester. This supports our view that allocations, and large-scale ones at that, are being sought to be brought forward for development in unsustainable and unsuitable locations. The wording of the policy also heightens residents' concerns in relation to the likely traffic, noise pollution and air pollution resultant from a

	development of this scale. It is therefore the view of SGMGB that the proposed policy and supporting allocation are insufficiently justified and fail to be consistent with national planning policy.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The policy and allocation are both therefore deemed to be unsound and should be deleted from the Plan.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 12 Main Town Centres
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Draft Policy JP-Strat 12 appears to set out clear support for increasing the provision of new homes within main urban areas which is clearly supported for the reasons set out throughout this submission. However, the policy as drafted does not set out a numerical commitment to the extent and nature of residential provision within town centres, nor the ability to promote growth and development given changing shopping habits and the enhanced access to public transport and facilities.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	As made clear previously, it is imperative that the changing environment of the High Street and the benefits this could foster in relation to employment and housing development is fully garnered within the Plan, and as such further work is required to examine and assess town centre locations and to draft suitable policies which support development within these sustainable locations.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-Strat 13 Strategic Green Infrastructure
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>

	<a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Given the importance placed on the protection of the Green Belt both within the Plan and the NPPF, and its value to the residents of Greater Manchester, it would unreasonable and unsound for the protection of such land allocations and assets not to be reflected within the above draft policy. The same could also be said in relation to other urban greenspaces, and countryside locations. Whilst elements of these spaces may well be addressed elsewhere within the Plan, to secure consistency, coherency, and clarity that these important spaces are valued their protection needs to be included within draft Policy JP-Strat13.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The policy needs to be duly amended to sate a clear commitment to the protection and promotion of green infrastructure.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-S 1 Sustainable Development
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to</b>	The provisions of draft policy JP-S1 are wholly supported. Our concern however is that the requirements and principles laid out within the policy are not being reflected within the approach to land

**comply with the duty to co-operate. Please be as precise as possible.**

release and allocating sites. The issue of viability justifying additional Green Belt release is not defensible and more needs to be done to maximise and accelerate the discussions with Government on securing funding to assist in the delivery and redevelopment of brownfield sites. Until more clarity can be provided on the funding that can be achieved, and the impact this may have on regenerating vacant and derelict sites, there should be no proposed release of land from the Green Belt. We therefore simply request that the Plan as drafted be duly amended throughout to ensure a consistent and justified focus on brownfield and previously sites, and the ongoing protection of the Green Belt. Further that a new Spatial Option be brought forward as a "reasonable alternative". This new Spatial Option will prioritise the key objectives of the Climate Action Plans of the nine member districts of PfE, over economic, social and housing objectives.

Policy JP-S 1 states that "to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously". In reality the environment seems to have been a secondary consideration throughout all permutations of the plan. The Growth and Spatial Options prioritised economic and population growth and the environmental consequences were always something that needed to be "mitigated". All the compromises have come at the expense of the environment and continue to do so.

Since the Regulation 18 consultation in 2019, all nine district members of PfE have declared climate emergencies and are required to bring forward and implement a Climate Action Plan. Given the increasing international gravity of the climate crisis, it will in all likelihood become the most dominant political issue of our lifetimes, and some major economic and demographic concessions are likely going to have to be made over the next couple of decades in our collective effort to combat its causes and mitigate its effects. A report by Shelley Phelps for the BBC

(<https://www.bbc.co.uk/news/science-environment-58102578>) recently found that a third of councils had policies incompatible with their climate goals. In this context it is difficult to argue against the merit of including a Spatial Option that prioritises the core objectives of each council's climate action plan, where the compromises come on the economic and housing side, with the priority clearly weighted on environmental matters.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

It is likely some of the objectives and policies advocated by the action plans will become mandatory over the next few years as we get to grips with climate change, so it will be useful to try and understand their impact now and to draft and implement robust planning policies which seek to set out clear targets for reductions in climate

	change and clear commitments to environmental enhancement. It may well be the case that the Plan that is best placed to respond to climate change will also be the most resilient over the next couple of decades as climate change escalates.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-S 2 Carbon and Energy
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The principles of Draft Policy JP-S2 are supported, and we welcome the GMCA's commitment to the protection of the environment. However, in order to achieve these targets and demonstrate that climate and environment protection is an objective and not an aspiration, we would ask that careful consideration be given to the reassessment of all previously developed land and the protection of vital greenspaces across Greater Manchester, including the Green Belt, which offer significant ecological and environmental value, and once lost simply cannot be replaced.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	In that regard we ask that the Plan be re-evaluated in light of the issue of climate change and the environment (attention is drawn to the current Lancaster Local Plan Review which is wholly focussed on this issue), and sites within the Green Belt, unsustainable locations and at risk from flooding are deleted from the Plan. Further, that the Plan sets out a clear objective of developing brownfield sites in urban and sustainable locations and to protect the Green Belt from release. By leading the way on environmental commitments, the GMCA has the potential to set a benchmark for evolving planning policy, and to create an effective and positively prepared Plan which meets the current needs of Greater Manchester, whilst protecting and respecting the needs of future residents to live in a green and health city region.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)

<b>Person ID</b>	1287356
<b>Title</b>	JP-S 4 Resilience
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Once again the basis and principles of draft Policy JP-S4 are supported and welcomed, however, the PFE as drafted fails to adhere to its requirements. There are a significant number of sites proposed for allocation which simply cannot meet the tests of resilience, including in relation to flood risk and other environmental considerations. A number of sites are poorly located and will in reality have detrimental impacts on the communities within which they are proposed to be situated. The PFE therefore simply cannot be found sound when the principles of one of the key policies are not being met with the proposed allocations, these issues are addressed in more detail at Section 7.</p> <p>Concern must also be raised in relation to point 10 which is noted to have been amended from the GMSF2020 draft. The Policy indicates a contribution towards the provision of affordable housing. Currently there are 70,000 people on housing waiting lists across Greater Manchester. The plan "aspires" to deliver 50,000 affordable homes but the final figure delivered could be significantly less. This is simply unacceptable. In a post covid economy and with housing affordability more of an issue than ever before, it is vital that housing is provided to meet the current and future needs of the community, with affordable provision being a key consideration, given the high house price values in many of the nine boroughs.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>The PFE should be drafted so as to ensure the delivery of the 50,000 units, and not just a contribution, as the level of contribution could be significantly less than the identified need, meaning the Plan will fail to meet the needs of the local community. In order to meet the tests of soundness we ask that the policy framework be duly amended to address these concerns.</p>



<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-S 5 Flood Risk and Water Environment
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	As set out within the site assessments at section 7 and the assessment of the evidence within Section 5, there are serious concerns in relation to the proposed release of Green Belt land and allocation of development sites generally within areas at risk from flooding. This is wholly unacceptable and cannot be justified on the basis of the evidence as currently put forward. It has been a clear planning principle for some time to avoid development within and on land at risk from flooding, and to be proposing large tracts of development in such areas would appear dangerous and ill-considered.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The PfE Plan needs to be revisited to ensure that all development being proposed to be brought forward is located within areas at no to lower risk from flooding, and to be able to demonstrate to the Examination that any such sites being proposed can be suitably mitigated and safely accessed and egressed without creating flooding elsewhere. Without such measures in place these sites should simply be deleted from the PfE Plan.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-S 6 Clean Air
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound

<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Given the extensive levels of development being proposed within the Plan area, and particularly within the outer areas, our client (SGMGB Action Group) have particular concern in relation to the likely impact on air quality and health as a result of increased traffic and general activity. The evidence base as drafted does not address their concerns sufficiently to provide the comfort they are seeking that their lives, health, and amenity will not be detrimentally affected by the nature and scale of development being proposed within the draft Plan.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	The evidence base should include additional assessment of the impact of proposed development levels on air quality and be used to support a policy which sets out clear commitments to the reduction of air pollution, and how developments are required to ensure the health of existing local communities.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-J 2 Employment Sites and Premises
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	It is noted within draft policy JP-J2 that the GMCA propose to release land from the Green Belt in order to provide the quality of well-connected employment land supply necessary to deliver the required scale of long-term economic growth. This statement raises two key questions, namely:  (1)As a result of the increased provision of working from home, and the likelihood of such an approach becoming a more normal feature of the work environment, is there still sufficient demand for the level of employment land being proposed within

the Plan, particularly of a sufficient scale to justify the release of Green Belt land? and

(2) What additional consideration has been paid in relation to securing the provision of employment uses within town centre locations given lifestyle changes and the increased levels of online shopping?

It would appear as though the GMCA have made the decision to secure significant areas of employment land without adequately assessing the alternatives. In our view the level of demand for office accommodation in particular will be directly affected by the change in work patterns. The changes being seen in our High Street offers an ideal situation to increase employment opportunities for non-retail uses in locations which are the most accessible and sustainable. This could facilitate a significant reduction in the land being developed on the edge of urban areas and could remove the need to release land from the Green Belt.

Warehousing comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in Greater Manchester. The North-East Growth Corridor would further exacerbate this problem. The old mill towns such as Oldham and Rochdale have been the hardest hit by de-industrialisation; warehousing and distribution have filled the gap and been effective at reconfiguring the mills as distribution centres. For this reason, storage and distribution have been embraced politically. However, what has provided a convenient short-term political quick-fix is in danger of becoming long-term economic folly.

Firstly, storage and distribution are low-density employment i.e. it is not an efficient use of employment space. This type of employment is also typically low skilled and low paid. This will stifle economic growth rather than accelerate it because it imposes a ceiling on productivity. For example, for a warehouse operator, the GDP per capita for grocery storage is more or less hard-capped. This cap essentially does not exist for a tech start-up, and in the case of R&D and green technology it is far less imposing. There is a perception amongst residents that the less productive industries are being forced into the north of the conurbation to free up premium employment space in the south. The key to boosting northern competitiveness is to diversify industry and increase opportunity across the region.

Secondly, storage and distribution are extremely vulnerable to automation. In its employment land projections, PFE bases its projections on the assumption that the employment density of I&W will not change, but this is unrealistic. The North-East Growth Corridor just forecasts more unemployment into Oldham's and Rochdale's

	<p>economic futures. The SGMGB therefore consider that the policy as drafted is unsound as it has not been positively prepared and once again has not been sufficiently justified.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>We therefore ask that the draft policy be modified to prohibit warehousing and distribution premises on the following draft allocations (which we have already requested to be deleted from the Plan):</p> <ul style="list-style-type: none"> <li>-JPA 1.1 (Heywood/Pilsworth)</li> <li>-JPA 2 (Stakehill)</li> </ul>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>
<p><b>Title</b></p>	<p>JP-J 3 Office Development</p>
<p><b>Agent Company / Organisation</b></p>	<p>Leith Planning Ltd</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>  <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a>  <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a>  <a href="#">PFE1287356_TimperleyWedgedpdf</a>  <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>NA</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>NA</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>The focus on office uses within urban areas is understandably supported, given the overall position set out within these representations. We also welcome the recognition of the role that town centres can play in meeting office accommodation needs over the plan period.</p> <p>We also appreciate the basis and justification for the potential for the individual boroughs to limit the freedom to change current office provision to residential under the prior approval process.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>It is important to ensure that the Plan is flexible and justified and would suggest that the wording of policy JP-J3 be amended to ensure that the use of article 4 directions is not unreasonably imposed and that the local plans does provide sufficient flexibility to allow residential uses within town centres where appropriate and justified. Otherwise, there is a risk that such an approach could limit development opportunities and simply result in new buildings remaining vacant and under-used in the future.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>

<b>Title</b>	JP-J 4 Industry and Warehousing Development
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgedpdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>In order for developments to meet the tests laid out within draft policy JP-J4, it is imperative for them to be well located for access to sustainable modes of transport. In reality this can only be achieved within the main urban areas and not by the release of Green Belt land in rural areas, or areas currently not well served by public transport links and good road access for large vehicles. The GMCA therefore need to revisit their proposed employment land allocations to ensure they meet with their own draft policies and development vision, in circumstances where there are questions on the suitability and sustainability of a number of the current proposed locations. Failure to ensure the proposed allocations meet with the requirements of draft policies would raise significant issues in relation to consistency and coherence and could render the Plan unsound.</p> <p>Over the plan period 3,960,389 sqm industrial and warehouse floor space will be provided. This is essentially the same amount of floor space as the 2020 draft of the Greater Manchester Spatial Framework (4,185,793 sqm), but with Stockport and the 2020-2021 completions removed. There is also a 5,000 sqm reduction at Stakehill, but apart from that the quantities of floor space appear to be identical to the 2020 draft. The crucial difference between PfE and previous drafts of the GMSF is that PfE has switched to a "past completions" model. This has resulted in a crucial policy change: the industrial land target for the duration of the plan has dropped from 4,100,000 sqm to 3,330,000 sqm. It could be suggested that the PfE is fundamentally different in terms of employment than proposed within the GMSF and so this should be a Reg 18 and not a Reg 19 consultation.</p> <p>However, the reduction in industrial land need has not been accompanied by a reduction in supply: a land supply of 3,960,389 sqm (which includes 2,154,880 sqm of allocations) equates to a 56%</p>

	<p>buffer in total. Earlier reports included in the GMSF documentation noted that a "supply margin of 50% falls well outside the bounds of what has been generally used elsewhere" ("Note on Employment Land Needs for Greater Manchester", Nicol Economics, February 2020, p. 28). Nicol Economics further notes that supply margins are "up to around 25% or at most 5 years of supply". Taken in conjunction with the policy, the allocations are not compliant with NPPF paragraph 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified□).</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>It is the view of the SGMGB that the policy as drafted is not compliant with national policy and does not therefore pass the tests of soundness. The policy should therefore be amended to remove any proposed allocations from the Green Belt, and to refocus employment uses within the main urban areas.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>
<p><b>Title</b></p>	<p>JP-H 1 Scale Distribution and Phasing of New Housing Development</p>
<p><b>Agent Company / Organisation</b></p>	<p>Leith Planning Ltd</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>  <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a>  <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a>  <a href="#">PFE1287356_TimperleyWedgepdf</a>  <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>The policy as drafted 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 the needs of Greater Manchester over the Plan period, particularly in light of section 13, paragraph 141 of the National Planning Policy Framework, and when assessing the reasonable alternatives as laid out elsewhere in this report. The plan as drafted is therefore deemed to be unsound and needs to be duly modified to secure the removal of all sites proposed for allocation which are currently designated as falling within the Green Belt, and</p>

additional land made available within the main urban areas and on previously developed land.

Attention is drawn to paragraph 7.12 of the draft Plan which reads as follows:

"Table 7.1 illustrates that, in numerical terms, the existing supply of potential housing sites identified in the districts' strategic housing land availability assessments and small sites is adequate to meet the overall identified need. However, meeting the numerical needs alone, is not enough. We must be able to demonstrate that its 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. In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it has been necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options, it has been concluded that in order to achieve this, it has been necessary to remove some land from the Green Belt and to allocate this land within this Plan for residential development."

Paragraph 7.12 makes it clear that the nine boroughs have sufficient sites to meet the identified housing needs, with 135,140 units to be sourced from brownfield land. In our view the level of existing land supply does not justify the proposed release of Green Belt to meet needs, and in fact cannot be used as part of the case for exceptional circumstances, as alternatives including a more detailed assessment of the impact of the pandemic on behaviours and general development needs, and the potential for more effective and efficient use of previously developed land can be delivered.

It is noted that table 7.2 sets out a potential programme of housing delivery. However, as we all know the tabulation is merely an exercise to show how development needs could be spread out over the plan period. However, once adopted any of the allocated sites could well be brought forward for development at any time, and it is clear that those easier to develop sites on greenfield locations and within the Green Belt will come forward in advance of those previously developed and brownfield sites, which require remediation and additional cost. Simply relying on future local plan reviews to correct any under or over provision does not address the fundamental concerns raised within this representation on overall levels and locations of delivery, and the concerns raised by the local community within their own submissions. It is the view of the SGMGB that the sites being brought forward for release from the Green Belt are in fact being delivered to serve the issue of a housing buffer, or flexible delivery within the Plan. However,

Green Belt sites can now only be brought forward for delivery and allocations once all other reasonable alternatives have been explored, and for the reasons laid out throughout these representations this test (as set out at section 13, paragraph 141 of the National Planning Policy Framework) has simply not been met.

When the GMSF went out to a Regulation 18 consultation in 2019 its key message was that the two cities would absorb housing need using high density formations from the surrounding boroughs and limit Green Belt loss. While many people opposed the housing allocations in the Green Belt, many were supportive of the general approach of using a city region masterplan to minimise the loss of green space. Indeed, many of the groups campaigning against the Plan favoured remaining in the Plan on this basis. Stockport's withdrawal notwithstanding, the GMCA and the councils have concluded that the PfE has substantially the same effect as the GMSF, and it is on this basis that PfE has dispensed with a further Regulation 18 consultation and progressed to a Regulation 19 consultation.

However, it is not as straightforward as this. As well as Stockport withdrawing, the City of Manchester's housing target was subject to a 35 percent uplift. Even after taking Stockport's withdrawal into account, this means that the City of Manchester is no longer absorbing housing need for the boroughs. In fact, the uplift has inverted this principle: the 2019 draft of the GMSF saw the City of Manchester absorb housing need and included a 9 percent buffer on the overall land supply. In PfE the City of Manchester no longer absorbs housing need and there is now a 15 percent buffer on the overall supply. This buffer is provided mostly by the boroughs: the buffer on the land supply for the City of Manchester stands at just 5 percent, whereas it collectively stands at over 20 percent for the other districts.

So in 2019 the residents of Greater Manchester were consulted on the basis that the two cities would absorb housing need, and this would reduce the loss of Green Belt. In PfE, Salford and the seven boroughs are now propping up the buffer for Greater Manchester through allocations on their Green Belt, which is wholly unacceptable to the residents within these communities.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

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. In terms of Green Belt, PfE now has the exact opposite stated effect to the 2019 draft of the GMSF. Many people who supported a joint plan because it would save Green Belt, would realistically now oppose it on the same grounds. PfE not only has a substantially



	different stated effect to the GMSF, in reality it now has the opposite effect. The policy as drafted is therefore not deemed to be legally compliant, and not sufficiently justified or consistent and does not therefore pass the test of soundness. The draft policy should therefore 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.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-H 2 Affordability of New Housing
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>For the reasons laid out in relation to the Scale, Distribution and Phasing of New Housing Development, we firmly believe that as 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 is wholly unacceptable and cannot be justified, nor will it be effective, and as such the Plan is likely to be found to be unsound. 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.</p> <p>In relation to the issue of housing affordability, and the level of affordable housing being proposed, attention is drawn to paragraph 7.23 of the draft Plan which states:</p> <p>"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. (79) It is estimated that around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices. (80) New build is just one of the ways to meet this need."</p> <p>Given that the level of need is some 22,000 higher than what is being proposed within the Plan we have significant concerns with the policies referred to above and the overall approach to housing delivery set out within. There is a clear of</p>

	<p>commitment on levels of provision, however a mere statement on contributions to the levels of delivery. In order to secure the future of the Greater Manchester area, it is imperative that young families and persons who wish to remain within the local area can afford to purchase homes close to their existing families and communities. The Plan should therefore be offering those residents in need more comfort and certainty that their voices and needs are being heard, and that they will be supported to find decent homes in their local area, and not simply the potential for a limited contribution which may not meet their requirements.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>It is noted that each authority will set their own affordable housing threshold for applications. In our view this is the incorrect approach if you are proposing a regional plan and wish to spread growth, investment and development fairly and equally across all nine boroughs. In our view there should be a consistent approach to the level and requirements of affordable housing across the Plan area, otherwise there is a danger that one authority could become more attractive for development impacting on wider delivery. We therefore ask that the policy be duly amended to send a standardised affordable housing target from new developments across the Plan area and to support the case that the Plan is sound.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>
<p><b>Title</b></p>	<p>JP-H 3 Type Size and Design of New Housing</p>
<p><b>Agent Company / Organisation</b></p>	<p>Leith Planning Ltd</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>  <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a>  <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a>  <a href="#">PFE1287356_TimperleyWedgepdf</a>  <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>
<p><b>Soundness - Justified?</b></p>	<p>Unsound</p>
<p><b>Soundness - Consistent with national policy?</b></p>	<p>Unsound</p>
<p><b>Soundness - Effective?</b></p>	<p>Unsound</p>
<p><b>Compliance - Legally compliant?</b></p>	<p>No</p>
<p><b>Compliance - In accordance with the Duty to Cooperate?</b></p>	<p>No</p>
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>In order to limit the need for Green Belt release we suggest that the tabulation and overall proposal for 35 dwellings per hectare 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. It is accepted that the policy goes on to differentiate between house types and</p>

density levels, but our clients are keen to ensure that the GMCA are doing all they can to promote and maximise the benefits to be achieved from development of land within urban areas, in order to protect the key natural asset of the Green Belt.

It is the view of SGMGB that ambiguous definitions in Policy JP-H 4 and outdated brownfield registers make it difficult to determine whether a site satisfies the criteria of the minimum density specification, and if the prescribed minimum density will be delivered. However, assessment of a sample of sites in Oldham, Rochdale and Tameside (that in our client's judgement satisfy the criteria) suggests that the minimum density specification is not being delivered, especially outside of the main town centres. If so, then Policy JP-H 4 is not deliverable by PfE.

If this is the case then the strategic objectives of the plan are compromised. 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 the Plan is not able to demonstrate the deliverability of Policy JP-H 4 then this also means it is not compliant with NPPF para. 141 (Before concluding that exceptional circumstances exist), nor is the draft policy deemed to be effective. The policy as drafted is therefore deemed to be unsound.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

The SGMGB therefore request the following modifications;

-Policy JP-H 4 should provide precise definitions for city centres, town centres, large designated centres and other designated centres. All the centres that these definitions apply to should be clearly identified i.e. all town centres should be listed, all designated centres etc.

-In addition to identifying the proposed density at the site, the SHLAAs should also 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.

-The plan should clearly state the average density projected in the SHLAAs for each density categorization in the specification, for each of the nine districts.

-The plan should 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.

-All brownfield registers should be brought up to date.

	We request that no Green Belt allocated for housing should be released until the plan demonstrates the deliverability of its minimum density specification.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JP-G 10 Green Belt
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>As laid out throughout this consultation response the SGMGB have several concerns with the PfE Plan as drafted, but their overriding concern is with the proposed loss of Green Belt as a matter of principle. It is accepted that there has been an overall reduction in the level of Green Belt proposed for development from earlier drafts of the Plan, however our clients still consider the scale proposed to be unacceptable and unjustified to demonstrate exceptional circumstances. It is our view, and that of our client that additional work is required to be undertaken in relation to the assessment of alternatives and a clear demonstration that all has been done to evaluate the development potential within urban areas, taking account of realistic levels of development demand, development need and the impact of changing lifestyles and on the character of the High street, the need for employment allocations and general activities and land availability within the urban area.</p> <p>As it stands it is our view that the case for exceptional circumstances to release land from the Green Belt has not been robustly made, and the evidence base as drafted is not fit for purpose. We therefore consider the plan to be unsound and in need of significant amendment, including the deletion of proposed development allocations within the Green Belt, before the tests of soundness can be seen to have been met.</p> <p>In evaluating the comment made above we would advise that the Green Belt of Greater Manchester functions at three levels: it operates at the city region level, (preventing Greater Manchester from</p>

	<p>merging with other counties), at the city and borough level (preventing districts from merging into each other) and the town level (preventing the smaller towns and villages that make up the boroughs from merging into each other).</p> <p>PfE appears to assign far less importance to the Green Belt that separates the boroughs and towns within, than to the Green Belt which encases Greater Manchester. PfE not only treats the internal Green Belt with a reckless disregard in many cases, but in some instances merging neighbouring boroughs and towns looks to be a design feature e.g. one of the main aspects of the Northern Gateway seems to be the joining of Bury and Rochdale, which runs completely against the original principles of allocating land within the Green Belt.</p> <p>This will be counter-intuitive for many residents who do not perceive their identity in city-region terms. PfE is an assault on the character of small towns and local identities. At a fundamental level the proposed re-designation of the Green Belt boundaries will change Greater Manchester into something most respondents to the 2019 consultation overwhelmingly rejected. It is therefore the view of SGMGB that the policy as drafted is not effective and nor is it consistent with national policy. The policy as drafted is therefore deemed to be unsound.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>In terms of modifications to the Plan to address the tests of soundness, it is imperative that a thorough, consistent and coherent re-evaluation takes place of all proposed Green Belt allocations, alongside a more detailed assessment of land within built up areas in line within section 13, paragraph 141 of the National Planning Policy Framework. It is the view of the SGMGB that there is more than sufficient land available within the region, within cities, towns and villages to meet the needs of Greater Manchester over the plan period, and as such all allocations proposed beyond defined settlement boundaries and those within the Green Belt should be deleted from the Plan, with development reallocated within the urban areas.</p>
<p><b>Company / Organisation</b></p>	<p>SaveGreaterManchestersGreenBelt(SGMGB)</p>
<p><b>Person ID</b></p>	<p>1287356</p>
<p><b>Title</b></p>	<p>JPA 1.1 Heywood / Pilsworth (Northern Gateway)</p>
<p><b>Agent Company / Organisation</b></p>	<p>Leith Planning Ltd</p>
<p><b>Type</b></p>	<p>Web</p>
<p><b>Include files</b></p>	<p><a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a>  <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a>  <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a>  <a href="#">PFE1287356_TimperleyWedgepdf</a>  <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a></p>
<p><b>Soundness - Positively prepared?</b></p>	<p>Unsound</p>

<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Heywood and Pilsworth (Northern Gateway) represents a huge incursion into the Green Belt and a gross scale of development which will have significant detrimental impact on the local community, ecological networks, the environment and the road network. The wording of the above policy accepts that the site is poorly located for access to public transport networks, and in reality, is also poorly related for access to key local services and facilities. The development will place a significant burden on the local transport network and regardless of junction improvements with the M66/M62 will worsen an already congested and busy stretch of the Manchester Motorway Ring Road to the danger of highway users. It is noted from paragraph 11.25 that the local authorities will continue to explore opportunities for a new junction at Birch, however this should have been addressed within any earlier applications on site, and if not within the proposed allocation, as without a clear demonstration that the scale of development can be safely and suitably accommodated within the existing road network, or with viable and agreed highway improvements, the reality is that the site should not be being supported for development and should be deleted from the Plan.</p> <p>Whilst the allocation includes an element of on-site education provision it is accepted that there will be financial contributions for off site places. However, in reality these are unlikely to be sufficient to fully address the impact of this scale of development on the local education service and could well be reduced through negotiations as part of any legal agreement in relation to viability etc, particularly when factoring in the potential cost of a cycle/pedestrian footway over the M62. The Plan and policy do not give assurances to the public about the siting and form of development, it is simply a numerical proposal with the masterplan proposals to be approved at a later date (although it is noted that the Plan makes reference to the fact that planning permission has already been granted on the site).</p> <p>The site is currently greenfield with some extensive areas of vegetation which will be lost as a result of the development. The loss generally of such a large area of greenfield will have detrimental impact on biodiversity and wider ecological networks, which in all reality will not be compensated for or mitigated to a degree which can override the loss. The allocation could result in the loss of an existing golf</p>

course, and clarification is sought that this has the support of Sport England and that the facility is no longer required to meet the needs of the community.

There is noted to be a brook running through part of the site and there are therefore legitimate concerns in relation to flood risk and specifically surface water flood risk once the development is completed and the impact on the wider local area.

When viewing the proposed allocation, with land adjacent also being proposed to be brought forward, it will result in the coalescence of two large urban areas and the total loss of a strategic gap to maintain separation. This is wholly unacceptable and flies in the face of the reasoning behind allocating land as Green Belt in the first place.

The site's location adjacent to a major motorway junction also raises concern regarding the impact of developing the site on the amenity of future residents both in terms of noise, but also air quality and health. Whilst reference is made at paragraph 11.34 to potential mitigation, there is no clarity at this stage as to what that could constitute and given the well publicised impact of poor air quality on health and respiratory issues, and the impact of detrimental levels of noise on mental health and well-being, these issues simply cannot be ignored.

Paragraph 11.35 makes reference to the existing grade II listed buildings within the allocation boundary, as well as to significant archeological sites including meadow Croft Fold, as well as numerous other designated heritage assets within the local area. Whilst the plan proposes that the impact of development on these assets be addressed at application stage within a Heritage Impact Assessment, it is our view that the impact on the setting and character of such important structures and features needs to be addressed prior to allocation in order to protect the assets for future generations.

<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
<p><b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b></p>	<p>Once again the Simister and Bowlee (Northern Gateway) Allocation represents a significant development which will have grossly detrimental impacts on local residents, the local highway network, ecological networks and local services. When you factor both parts of the Northern Gateway together, it is clear that the impact of this scale of development will be worse than significant. It is the view of our clients that both allocations individually and cumulatively are unacceptable and represent the wrong development, at the wrong scale in the wrong place. The SGMGB therefore request that the proposed allocation be deleted from the Plan.</p> <p>It is noted that the Plan proposes that the allocation will deliver around 1,550 homes, with some other improvements in the local highway network and public transport provision, although the clarity on what this may entail is clearly lacking at this stage. The Policy also requires the provision of cycle routes, affordable housing and a two from entry primary school, as well as a financial contribution to off-site secondary school provisions. Other requirements include investment in infrastructure and utilities and a new local centre in an accessible location to include a range of retail, health and community facilities. Clearly the other benefits to be achieved from the allocation have been set out and are supported, however the scale of those benefits and the ability for a developer to negotiate out of these requirements as part of any section 106 discussions and section 278 negotiations is of significant concern, in circumstances where should these be demonstrated to make the scheme unviable and removed from the development, the impact of this scale of development on this location will only be exacerbated.</p> <p>The concerns on technical issues including flood risk, surface water run-off, ecology, biodiversity and the highway network set out in relation to the Heywood and Pilsworth allocation apply in equal measure to this further allocation. Whilst the wording of the above policy seeks to address some of those, in reality all it is doing is pushing the issue back to be addressed at application stage once the principle of development has been established within the Plan. However, without clear demonstration on matters including highway impact, ecological issues and flood risk at this stage we would argue that this proposed allocation cannot be found to be sound and should in fact be deleted from the Plan. The concerns on technical issues including flood risk, surface water run-off, ecology, biodiversity and the highway network set out in relation to the Heywood and Pilsworth allocation</p>



apply in equal measure to this further allocation. Whilst the wording of the above policy seeks to address some of those, in reality all it is doing is pushing the issue back to be addressed at application stage once the principle of development has been established within the Plan. However, without clear demonstration on matters including highway impact, ecological issues and flood risk at this stage we would argue that this proposed allocation cannot be found to be sound and should in fact be deleted from the Plan.

We are not aware of any heritage assets being located within the allocation boundary, however as set out at paragraph 11.35 above we are aware of various heritage assets being located within the wider local area and would ask that greater regard be paid to the impact of the scale and form of development on their setting, character and long-term future as a result of these development proposals.

Paragraph 11.39 accepts that this is a semirural location and draws attention to the small villages of Simister and Bowlee and advises that they will be respected and will inform the layout, density and built form of development. However, as a result of the scale and form of development being proposed, the character and setting of these semi-rural villages will be totally lost and swallowed up by the new community being proposed within this major allocation. The character of the area will be completely changed and, in all reality, this will now become a large part of the general Greater Manchester urban area, as opposed to the semi-rural setting it currently benefits from.

<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JPA 2: Stakehill
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgedpdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)

<b>Person ID</b>	1287356
<b>Title</b>	JPA 3.1: Medipark
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	It is noted that the reasoned justification for this proposed allocation is somewhat limited in detail, providing third parties with very little clarity as to what they can expect from the proposed allocation and the technical issues which would need to be addressed at application stage. This would include the fact that the allocation is located adjacent to an area at risk from flooding, has existing vegetation and habitat potential which could be lost despite proposals for mitigation and green infrastructure through the site. There are also noted to be a number of Grade II listed heritage assets at Newall Green Farmhouse which will be affected by the development of this land parcel, and the impact on their setting and character need to be carefully considered with any harm robustly justified.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JPA 3.2: Timperley Wedge
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No

<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	This is a significant development that would lead to the coalescence of existing urban areas. The area contains a significant rural park which does not require release from the Green Belt to be delivered. In any event the proposed boundary should exclude the area currently shown as a "Rural Park". As set out above and within the detailed site assessment within appendix 5, this allocation is unsustainable and unsuitable and should be deleted from the Plan.
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	JPA 32: South of Hyde
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments

<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>

<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Supporting Evidence
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound

<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Company / Organisation</b>	SaveGreaterManchestersGreenBelt(SGMGB)
<b>Person ID</b>	1287356
<b>Title</b>	Other Comments
<b>Agent Company / Organisation</b>	Leith Planning Ltd
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287356_SiteAssessmentStakehill.pdf</a> <a href="#">PFE1287356_SiteAssessmentSimister.pdf</a> <a href="#">PFE1287356_SiteAssessmentMedipark.pdf</a> <a href="#">PFE1287356_TimperleyWedgepdf</a> <a href="#">PFE1287356_ResponseLeithPlanning_Amend.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No