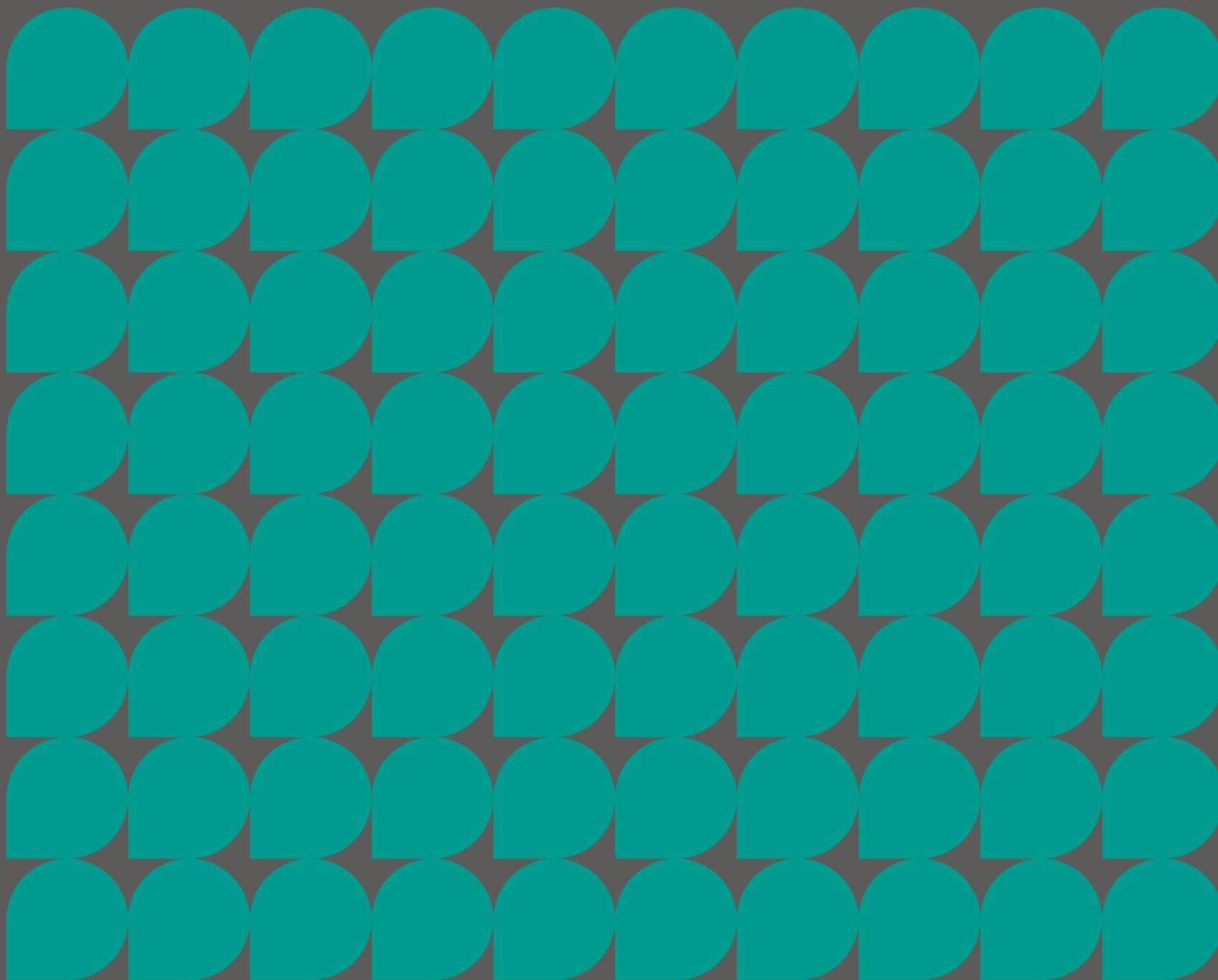


# Places for Everyone

Sustainable and Resilient Places Issues  
Summary

February 2022



# Chapter 5 - Sustainable and Resilient Places

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 5- Sustainable and Resilient Places and the relevant respondents to PfE 2021 is set out below:

## PfE 2021 Policy JP-S 1 - Sustainable Development

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Paragraph 1	Sustainable Development		
JP-S1.1	Support for the principle of a Sustainable Development Policy in PfE	Support for the principle of the policy is noted.	See Appendix
JP-S1.2	PfE does not maximise social and economic benefits as the amount and type of housing proposed will not support the strategic policies for economic growth. PfE will not therefore achieve sustainable development.	No change considered necessary. All new development must meet policies in the PfE to ensure they are sustainable and are consistent with the requirements of NPPF. The Plan must be read as a whole. PfE has been subject to <a href="#">Strategic Environmental Assessment [02.01.01 to 02.02.02]</a> , including an Integrated Assessment which has assessed the impact of the plan, including the allocations, against a number of objectives, including those relating to sustainability.	Royal London Asset Management Rowland Homes Ltd Seddon Homes Ltd Taylor Wimpey
JP-S1.3	The policy does not recognise the historic environment of the area that needs protecting. A new paragraph needs to be inserted into the policy to address this. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	No change is considered necessary as policy JP-S1 is consistent with the NPPF. The protection and enhancement of the historic environment and its assets is enshrined throughout PfE and more specifically Section 8 Places for People, Policy JP-P 2 Heritage and Policy JP-P 3 Cultural Facilities and is consistent with paragraph 190 of the NPPF. This is evidenced in The Historic Environment Background Paper 2020 <a href="#">[08.01.12]</a> and individual site allocation historic environment assessments where appropriate <a href="#">[08.01.01-08.01.11]</a> .  The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report <a href="#">[02.01.01]</a> .	Historic England
JP-S1.4	No reference to 'presumption in favour of sustainable development' so not consistent with NPPF. Policy should be redrafted to afford equal weight to economic, social and environmental objectives of sustainable development. No overarching policy basis for sustainable development.	No change considered necessary. Policy JP-S1 is considered to be consistent with the NPPF. PfE paragraphs 5.1-5.4 makes reference to the role of PfE policy in contributing to sustainable development, the three overarching objectives (social, economic and environmental) which are mutually supportive and the overarching goal of sustainable development, in line with objective 7 of the PfE and NPPF paragraphs 7 and 8. Also see	EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Russell LDP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		response in row JP-S1.2 regarding the Strategic Environmental Assessment.	Boys and Girls Clubs of GM Taylor Wimpey Church Commissioners of England
JP-S1.5	Plan should be re-evaluated in light of climate change and the environment, setting targets to meet environmental targets as over-riding priority.	No change considered necessary. PfE Sustainable and Resilient Places Chapter 5 contains strategic policies consistent with the NPPF in relation to climate change. The policies are supported by an what is considered to be an appropriate and proportionate evidence base: further details can be found in Carbon and Energy Topic Paper [04.01.05] and the Carbon and Energy Implementation Plan [04.01.01]. The effects of climate change is a key issue against which the plan is assessed within the Integrated Assessment; see Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and Integrated Assessment of the GMSF Main Report 2020 [02.01.02] page 2 and Integrated Assessment of the PfE Plan - GMSF Main Report Addendum [02.01.05] pages 3 and 4.	Save Greater Manchester Green Belt Stephen Cluer Peter Thompson Wolstenholme Fold Farm Save the Greater Manchester's Green Belt Group
JP-S 1.6	Plan should consider the environmental impacts of new development proposed i.e. air pollution, traffic generated, alternatives for energy production, development likely to have negative impacts on communities	See response in row JP-S1.5. The plan should be read as a whole and therefore no changes are considered to be necessary.  In relation to traffic and air pollution, paragraph 5.49 of the PfE highlights that the primary focus is on transport given its primary contribution to air pollution, therefore regard should be had to transport policies elsewhere in the plan (Chapter 10 Connected Places). The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026.	Janine Lawford Woodford Neighbourhood Forum Kristian Dodsworth Andrew Scanlon Save the Greater Manchester's Green Belt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>PfE policy JP-C7 sets out the requirement for proposals for new development to be accompanied by a transport assessment and travel plan; JP-S6 requires an air quality assessment, when necessary.</p> <p>In relation to alternative energy production; policy JP-S2 Carbon and Energy and JP-S3 Heat and Energy Networks refer to decarbonisation of energy and support renewable energy in GM. The evidence is located in the Carbon and Energy Topic Paper <a href="#">[04.01.05]</a>.</p>	
JP-S1.7	There needs to be an assessment of the impact of new development upon existing infrastructure, such as doctors and schools.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P5, JP-P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The plan needs to be read as a whole, therefore no changes are considered necessary.</p> <p>District's Infrastructure Funding Statements provide details of monies secured (and spent) in relation to agreements. The plan has been subject to <a href="#">Strategic Environmental Assessment [02.01.01 to 02.02.02]</a>.</p>	<p>Frances Davidson Samantha Dugmore Janine Lawford Rachel Mellish C Smith Andrew Scanlon Save the Greater Manchester Green Belt Save the Greater Manchester Green Belt</p>
JP-S 1.8	The Plan should be reconsidered in light of the impacts of the Covid 19 Pandemic to ensure that land is efficiently being utilised (considering the behavioural and social, economic changes caused by the pandemic).	No change considered necessary. As detailed in Chapters 1, 6 and 7 of PfE, two assessments of the potential impacts of Covid-19 and Covid on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a> .	<p>Stephen Cluer C Smith</p>
JP-S1.9	Overall approach of PfE to sustainable development aligns with National Highways' policy.	Comment noted.	National Highways
Paragraph 2	Preference for brownfield/ PDL		
JP-S1.10	'Preferring' to use brownfield land is inconsistent with national planning policy. National planning policy requires plans to make 'as much use as possible of previously developed' or 'brownfield' land (except where this would conflict with other national planning policies). Preference for	No change is considered necessary. In line with NPPF, a 'preference' for using brownfield land ensures that efficient use can be made of the land supply and to keep the release of greenfield and Green Belt land to a minimum. The Plan seeks to make efficient use of land and part of this	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>brownfield land will work against the other policy objectives like affordable housing.</p> <p>Preference' for brownfield land should be replaced with 'make as much use as possible of previously developed (brownfield) land to meet development needs' in line with NPPF.'</p>	<p>strategy is building homes at higher densities, particularly within the Core Growth Area. Recent delivery rates, demonstrate that the relevant targets within this area are deliverable. Details of the housing land supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>.</p>	
JP-S1.11	<p>There should also be support for higher growth densities around transport hubs, however whilst considering appropriate living conditions</p>	<p>See response in row JP-S1.10. PfE supports a pattern of development that minimises the need to travel and the distance travelled by non-active modes of transport to jobs, housing and other services (Policy JP-C 1: An Integrated Network). Improving connectivity supports the move to carbon neutrality/ low carbon economic growth and greater levels of inclusive growth. No change is considered as necessary. Policy JP-H-4 seeks to ensure new housing development is delivered at a density appropriate to the location and establishes minimum net residential densities for different locations, including around public transport hubs.</p>	<p>Redrow Homes (Lancashire)</p>
JP-S 1.12	<p>This policy implies a sequential approach to site selection and that previously developed land will take precedence over the development of greenfield land.</p>	<p>See response in row JP-S1.10. In addition, the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p>	<p>Kate Mullineux Save Greater Manchester's Green Belt Chris Waterfield Warburton Parish Council Peel L&amp;P Investments(N) Ltd PD Northern Trust Asset Management Hollins Strategic Land Simon Robertson</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 1.13	By concentrating development in urban areas it is likely to exacerbate social and economic problems in densely built up inner areas, many of which already suffer from deprivation.	No changes considered necessary. In line with NPPF, the Plan seeks to promote the development and regeneration of brownfield land within the urban area. Chapter 4 of PfE (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. No changes are considered necessary. In addition, a number of policies in the Plan provide a sufficient policy framework to address the provision of supportive infrastructure, such as Policies, JP-G6, JP-P1 JP-P5, JP-P6 and JP- D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and health facilities.	See Appendix
JP-S 1.14	Support for Sustainable Development Policy however reference should be made to the need for sustainable greenfield sites/Green Belt land to meet development needs. A more balance approach to the use of brownfield and greenfield development is needed. Emphasis should be on an 'effective use of land'. All 'suitable sites' should be considered and brownfield sites are not always 'suitable'.	See response to row JP-S1.10.	See Appendix
JP-S1.15	Para 1 is confusing and suggests climate change is the only priority and is weak in its wording; using 'aim to' and 'actively seek'; should include biodiversity emergency.	No change is considered necessary. The wording is considered appropriate. The Integrated Assessment has assessed the policies in relation to the climate emergency (IA Scoping report 2021 (02.01.01) and IA Addendum 2021 ( 02.01.04) Policy JP-S1 focuses on mitigation of climate change, Policy JP-G 9 focuses on the commitment to biodiversity and net gain, setting out requirements for new development. The plan should be read as whole.	The Wildlife Trusts
Paragraph 3			
JP-S 1.16	Support, but consideration should be given to the coal mining legacy, minerals planning and safeguarding and land stability in relation to development proposals.	No change is considered necessary. The last paragraph of the policy JP S-1 sets out the requirement for previously developed land to take consideration of land contamination and stability issues.	The Coal Authority

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		The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and will continue to be applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary.	
JP-S 1.17	Para 5.4 should refer to biodiversity emergency	See response to row JP-S1.16	Greater Manchester Housing Providers
JP-S1.18	Policy is contrary to national policy to 'safeguard encroachment into countryside'	No changes considered necessary. The plan is written in line with NPPF paragraph 138 (c), with policy JP-G10 in Chapter 8 Greener Places focusing on the protection of Green Belt	Gary Taylor Chris Waterfield

## PfE 2021 Policy JP-S2 Carbon and Energy

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 2.1	Support for Policy	Support is welcomed.	David Hawes Friends of the Earth Royal London Asset Management Peel L &P Investments (N)Ltd Northern Gateway Development Vehicle LLP Simon Robertson Katherine Grant WR Halman GM Coalition of Disabled People and Manchester Disabled Peoples Access Group Peter Thompson Greater Manchester Housing Providers
JP-S 2.2	Delivery of this objective needs to be undertaken through a strong partnership between the GMCA and housing developers in order to support development of affordable solutions for carbon neutrality. Otherwise, the costs of meeting this objective are likely to result in a reduction in the scale of proposed development of new build homes.	No changes considered necessary. In 2020, the 10 districts and GMCA declared a climate emergency and to support this vision launched the 5-year Environment Plan. Part of this plan is a commitment to work with all stakeholders towards being carbon neutral by 2038; including a programme of mitigation. This policy supports this ambition and sets requirements to help achieve it. PfE paragraph 5.5, p83.  In terms of considering the costs of meeting this objective, the Strategic Viability Assessment Part 1 considers the costs of carbon mitigation relating to policy JP-S2, <a href="#">[03.03.01]</a> , pages 29 and 30 and pages 63-65 consider the viability and technical appendices <a href="#">[03.03.03]</a> page 5. Further	Greater Manchester Housing Providers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>evidence is set out in the Carbon and Energy Implementation Plan Part 1 [04.01.01] pages 176-183 and Part 2 Carbon Offsetting [04.01.02].</p> <p>Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>	
JP-S 2.3	Policy is too narrow - environmental aspects also include natural, built and historic environments	No changes considered necessary. The protection and enhancement of the historic environment and its assets is enshrined throughout PfE and more specifically Section 8 Places for People Policy JP-P 2 Heritage and Policy JP-P 3 Cultural Facilities. It is considered that PfE has been written in line with paragraph 190 of the National Planning Policy Framework which requires that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, this is evidenced in The Historic Environment Background Paper 2020 [08.01.12] and individual site allocation historic environment assessments where appropriate [08.01.01-08.01.11].	Historic England
Part 1			
JP-S 2.4	Achieving zero net carbon emissions by 2038 is overly optimistic when compared to the UK wide target of 2050 and not consistent with government policy, paragraph 16 of the NPPF. Rather than Be net zero carbon, this should be 'Future Homes Standard'	No changes considered necessary. The proposed policy approach is justified in the Carbon and Energy Topic Paper (04.01.05) and through further research carried out by The Tyndall Centre, who have set a carbon budget for Greater Manchester and a pathway to achieve this; this will need to include a comprehensive range of measures, one of these is the PfE strategic planning policy.	Andrew Scanlon Roy Chapman Redrow Homes (Lancashire) Redrow, HIMOR Partnership
JP-S 2.5	The Plan is inconsistent with regard to its required reductions in carbon emissions (should comply with Climate Change Act, Clean Air Act and Paris Agreement). Some of the policies (including strategic allocations) are inconsistent with carbon reduction aims.	No changes necessary, the policy approach is considered consistent with the NPPF and national climate change policy and legislation. Policies in PfE Chapter 5 are supported by evidence in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01]. The effects of climate change are a key issue against which the plan is assessed within the IA; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and Integrated	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Assessment GMSF Main Report 2020 <a href="#">[02.01.02]</a> page 2 and Integrated Assessment GMSF Addendum <a href="#">[02.01.05]</a> pages 3 and 4.	
JP-S 2.6	Development on Green Belt will increase carbon thus making it impossible to be carbon free by 2038.	<p>No changes considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>It is considered that a proportionate evidence base has been provided to support this approach. In particular, the exceptional circumstances for development have been provided in the Green Belt Topic paper <a href="#">[07.01.25]</a> and alternative options to meet development needs are set out in the Growth and Spatial Options Paper <a href="#">[02.02.10]</a></p>	<p>E Bowles Janet Taylor Joanne Maffia Gillian Boyle Martin Rigby Janine Lawford Carol Lee Joanne Koffman Mark Brodigan Alan Heald John Dawson Andrew Scanlon AARD - Action Against Rural Development</p>
JP-S 2.7	An increasing reliance on cars and increasing traffic means this policy is not achievable; support for significant national and regional projects including major road scheme do not support the carbon neutral ambition.	No change is considered necessary. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in Greater Manchester and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in <a href="#">09.01.01</a> Greater Manchester Transport Strategy 2040 and <a href="#">09.01.02</a> Greater Manchester Transport Strategy Our Five Year Delivery Plan 2021-2026.	<p>Janet Millett Colin Walters Kim Scragg Janet Taylor Janine Lawford Joanne Koffman Jennifer Simm Laura Charlotte WR Halman Susan Sollazzi CPRE</p>
Part 1	Promoting retrofitting of buildings		
JP-S 2.8	The terminology 'promote' is not a definite. All available resources should be used to facilitate green energy and development, preferably before 2028.	No changes considered necessary. The use of the word 'promote' reflects the status of policy which identifies a range of measures that will support the delivery of a carbon neutral Greater Manchester by 2038. The Planning and Energy Act 2008 allows Local Planning Authorities to	Simon Robertson

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		<p>require energy efficiency standards above Building Regulations, in line with the government's commitment to Clean Growth. GMCA has been working with the Green Building Council to assess how current building stock can be retrofitted at an affordable cost.</p> <p>The Tyndall Centre for Climate Research calculated a carbon budget for Greater Manchester to achieve carbon neutrality by 2038. Greater Manchester Carbon Commitments are set out on p.24 of 07.01.05 Carbon and Energy Topic Paper (<a href="#">04.01.05</a>).</p>	
JP-S 2.9	Why is there no requirement for carbon neutral homes now, better than retro-fitting?	No changes considered necessary. JP-S 2 Part 8 sets out targets for net zero in new homes; with the objective of all new homes to be net zero by 2038. This aligns with the objectives of <a href="#">GM 5 Year Environment Plan</a> and national policy.	<p>Sheila Fisher</p> <p>Linus Mortlock</p> <p>Janet Brooks</p> <p>Chris Green</p> <p>John Dawson</p>
JP-S 2.10	Support for renewable energy and retrofitting	Support noted.	<p>Friends of the Earth</p> <p>Greater Manchester</p> <p>Coalition of Disabled</p> <p>People and Manchester</p> <p>Disabled Peoples</p> <p>Access Group</p>
JP-S 2.11	Alternative routes to heat decarbonisation may be cheaper and more convenient than retro-fitting, such as a conversion to hydrogen, or injection of bio gas into the grid. Hydrogen produced by natural gas can still be carbon neutral.	No changes considered necessary. The policy supports the integrated approach to local carbon energy through renewable and low carbon schemes, the use of hydrogen is considered to be one of these approaches which could be technically feasible; however there are a number of challenges to be overcome and evidence questions the ability to produce sufficient quantities of hydrogen at an acceptable cost for it to make up a significant part of the UK energy generation system, page 9 and 14 of <a href="#">GM Spatial Energy Plan</a> .	<p>Northern Gateway</p> <p>Development Vehicle</p> <p>LLP</p>
Part 3	Encouraging renewable and low carbon energy schemes		
JP-S 2.12	Support for the approach and technology of photovoltaics; but concern that Local Plans consider the viability of carbon policies	Policy JP-S2 takes a positive approach to renewable schemes, particularly schemes that are led by or meet the needs of local communities. Support for this is welcomed. This aligns with the page 9 of	<p>Rowland Homes Ltd</p> <p>Highland Strategic Land</p> <p>PD Northern Steels</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		the <a href="#">GM Spatial Energy Plan</a> sets out the solar PV technical potential for GM.	Boys and Girls Club of GM PD Northern Trust Asset Management
JP-S 2.13	Make solar arrays compulsory to all existing and new commercial, industrial and residential development across GM from 2023.	Support for solar is welcomed. The policy is considered to align with the Greater Manchester <a href="#">Climate Change and Low Emission Implementation Plan for GM</a> which looks to take a positive approach to renewable energy.	Friends of the Earth
JP S 2.14	No policies on large scale strategic infrastructure such as solar, wind turbines or hydrogen, which could form an important part of the solution to net zero carbon.	No change is considered necessary. Policy JP-S2 takes a positive approach to renewable schemes, particularly schemes that are led by or meet the needs of local communities. Local Energy Plans will be encouraged to set out requirements of an area and positive approaches to low carbon energy to meet local energy needs.	Northern Gateway Development Vehicle LLP
Part 4	Keeping fossil fuels in the ground		
JP S 2.16	Support for keeping fossil fuels in the ground and presumption against fracking	Support for Policy JP-S 2.4 and paragraph 5.19 is welcomed.	W R Halman Peter Thompson Friends of the Earth
Part 5	Smart Electricity Grid		
JP S 2.17	Details of where and when developments are likely to occur is essential in forward planning terms so to provide sufficient future electrical network capacity across the GM area in the right places at the right time.	No change is considered necessary. The <a href="#">GM Spatial Energy Plan</a> sets out that the capacity of GM's electricity network to accommodate increased demand is considered generally robust; with some areas with limited capacity to accommodate new demand (Electricity NW). The policy encourages the development of Local Area Energy Plans which would form the foundation for effective and sustained local action towards decarbonisation of energy. Further evidence is set out in the Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> , paragraph 3.55 p56/47.	Chris Green Janet Brooks
Part 6	Support for nature-based solutions		
JP-S 2.19	Development on GM peatlands goes against this policy for carbon reduction. Development proposed on peat mosslands within the PfE	No change is considered necessary. To support Greater Manchester's move towards becoming carbon neutral, Policy JP-S2 contains criteria 6, which encourages a range of nature based solutions including carbon	See Appendix

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	allocations would negate the ability to utilise peatlands as a nature-based solution; a carbon store and sequestration.	sequestration through the restoration of peatlands, in line with the national objectives.  In relation to new development, Policy JP-G 9 at paragraph 8.53 does however recognise that while development would ordinarily be directed away from valuable soils, given the overall scale of development that needs to be accommodated, a limited amount of development on higher grade agricultural land/ peatlands is necessary.	
Part 7	Development of Local Area Energy Plans		
JP-S 2.20	Carbon mitigation costs are not really considered in the Three Dragons viability work. There is no consideration for the carbon off-setting costs nor the costs of on-site policy compliance costs or energy statements. The policy is therefore not sound.	A strategic viability assessment has been published alongside the PfE Plan. The Strategic Viability Assessment Stage 1 considers the costs of carbon mitigation relating to policy JP-S2, <a href="#">[03.03.01]</a> , pages 29 and 30; pages 63-65 and Strategic Viability Assessment Technical Appendices <a href="#">[03.03.03]</a> page 5 and Carbon and Energy Implementation Plan - Carbon Off-setting <a href="#">[04.01.02]</a> .  Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore no change is considered necessary.	Northern Gateway Development Vehicle LLP Peel L&P Investments (N)Ltd Highgrove Strategic Land Ltd Rowland Homes Ltd Peter Thompson EON Plant Ltd PD Northern Steels Seddon Homes Ltd Seddon Homes Ltd
Part 8	New development requirements		
JP-S 2.21	Achieving net zero carbon in homes and commercial buildings by 2028 is overly optimistic and not set out in NPPF and NPPG, nor is there a legislative basis for it not being replicated by Local Plans - too onerous and is considered to affect costs of development as it is more stringent than the government's target. Increasing build costs must be balanced against other contributions eg affordable housing.	No change is considered necessary  The policy requirements set out in Policy JP-S2 are considered as technically feasible and cost-effective; however a stepped approach will allow time for the construction industry and planning system to adapt to the new standards required.  To provide certainty about the progression to net zero, the viability of the approach, research was completed by Currie and Brown/Centre for Sustainable Energy in relation to net zero carbon development (pathway	Seddon Homes Redrow Homes (Trafford) Redrow Homes (Lancashire) Homes Builders Federation J & B Fitton GLP Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>approach, compliance with building regulations, costs, metrics and implementation); Paragraph 9.3 of Carbon and Energy Policy Implementation Study <a href="#">[04.01.01]</a> pages 190-191.JP-S 2 makes reference to this in paragraph 5.11.</p> <p>The scale of development which will take place in GM over the plan period makes it imperative that the 2028 target for net zero carbon new development comes into force as soon as possible. This approach is therefore considered justified and effective in tackling climate change, evidence is in: Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> paragraphs 3.32-3.53, p46-54.</p>	<p>Susan Southward Bluemantle Emery Planning Bowden Rugby Club Miri Roshni W R Halman C L Halman F I Carless J M Gibney Morris Homes Redrow Homes (Lancashire) GLP Trows LLP and BDW Trading Ltd CCW&amp;G</p>
JP-S 2.22	Policy doesn't address carbon produced in the construction process.	No change is considered necessary. Policy JP-S Part 8a applies to operational net zero carbon upto 2028 and net zero 'in construction' from 2028 onwards in line with UK GBC Framework – this framework gives clarity on how to achieve net carbon in construction and operation. One of the aims is to shift towards buildings that are net zero whole life carbon (addressing all impacts associated with construction, operation and end-of-life stages). A definition is set out in GBC's <a href="#">Net Zero Carbon Buildings</a> .	Colin Williams
Part 8b)	EV Charging Points		
JP-S 2.23	This policy is ambiguous - what does 'adequate' mean? Should be explicit that this measure will be set out in Local Plans, unsound as contrary to 16 (d) of NPPF.	The wording is considered appropriate and does not require modification.	<p>Morris Homes Redrow Homes (Lancashire) Redrow, HIMOR Partnership Jones Homes Oltec Group Ltd</p>
Part 8e)	BREEAM		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 2.24	The expectation that non-residential development will achieve an excellent in BREEAM standard presents significant feasibility issues and has not been subject to viability testing. Feasibility of criterion 8e on a range of development types should be undertaken.	No change is considered necessary. This policy sets a sustainability target for non-domestic buildings as BREEAM minimum rating of 'Excellent' and 'Outstanding' from 2028 in a stepped approach. It is considered that a proportionate evidence base has been provided to support the policy, it can be found in Carbon and Energy Implementation Study 2020 [04.01.01] paragraph 7.2, p.163-171 and the literature review evidence conclusions are on page 177-78. In terms of the viability of the policy, evidence is set out in the Strategic Viability Assessment Part 1 [03.03.01] pages 22/23, and technical appendices [03.03.03] page 5, also in Carbon and Energy Implementation Study [04.01.01] pages 163-171.	Peel L & P Investments (N) Ltd Russell LDP
Part 8f)			
JP-S 2.25	Requirement for all development to undertake detailed Energy Statement at the planning application stage is costly and a viability assessment of this policy has not been undertaken. Requirement should be proportionate to development.	See response in row JP-S2.21.  In terms of the viability of the policy, evidence is set out in the Strategic Viability Assessment Part 1 [03.03.01] and technical appendices [03.03.03] page 5, also in Carbon and Energy Implementation Study [04.01.01] pages 179/180. No change is considered necessary.  Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 makes provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore no change is considered necessary.	Peel L & P Investments (N) Ltd Emery Planning
JP S 2.26	Concern over loss of trees and planting which is a good carbon sink.	No change is considered necessary. Policy JP S-2 part 6 encourages a range of nature-based solutions including carbon sequestration, woodland management and tree-planting as an important part of delivering a carbon neutral Greater Manchester.	E Bowles Kim Scragg David McLaughlin Janet Brooks AARD
JP-S 2.27	Policy needs to incorporate flexibility into the wording to ensure that there is no unnecessary burdensome requirements which could impact viability and deliverability; such as carbon off-setting.	See response in row JP-S2.25.	See Appendix
	Evidence base		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 2.28	Lack of evidence base relating to carbon policies and carbon impact of development proposed in PfE (missing from Integrated Assessment) and no technical feasibility of policy.	No change is considered necessary. JP-S2 is a strategic planning policy. Consistent with NPPF, it sets out a robust strategic policy framework for Carbon and Energy. The policy is supported by an appropriate and proportionate evidence base, considering measures to deliver a carbon neutral Greater Manchester.  Further details of which can be found in Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Part 1 [04.01.01] and Part 2 [04.01.02] and the IA Scoping Report 2021 [02.01.01] and IA Main Report [02.01.02 ] and Main Report Addendum [02.01.05].	Peel L & P Investments (North ) Ltd Mark H Burton Susan Sollazzi CPRE Liam Harvey Friends of Carrington Moss W R Halman
JP-S 2.29	More evidence relating to public buildings providing suitable locations for renewable energy schemes	No change is considered necessary. Policy JP S-2 takes a positive approach to renewable and local carbon schemes and as a strategic policy; the detail will be considered by the individual districts. This approach is consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'.	Friends of Carrington Moss
JP-S 2.30	Positive engagement with the farming community will be key in unlocking these opportunities; there is a great deal of potential for using farmland as a source of renewable energy, GMCA should look to facilitate renewable energy projects.	No change is considered necessary. Policy JP S-2 makes reference to taking a positive approach to renewable and local carbon schemes.	National Farmer's Union
JP-S 2.31	Calls for re-assessment of plan and allocations in line with climate change goals; setting targets is the over-riding priority	No change is considered necessary. Consistent with the NPPF, PfE Chapter 5 contains policies in relation to climate change which are supported by evidence in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01]. The impact of climate change is a key issue against which the plan is assessed within the IA; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and IA GMSF Main Report 2020 [02.01.02] page 2 and IA GMSF Addendum [02.01.05] pages 3 and 4.	SGMGB Alan Heald Andrew Scanlon Stephen Cluer Woodford Neighbourhood Forum Susan Sollazzi Friends of Carrington Moss
JP-S 2.32	The plan should include measures such as home working and community hubs.	Policy JP-P 1 sets out policy in relation to creating sustainable places which are adaptable to changing needs and socially inclusive; which are	Sheila Fisher

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		well-served by shops and services. The plan should be read as whole and no change is considered as necessary.	
JP-S 2.33	Plan needs to be reviewed against mineral safeguarding / update of minerals plan	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Minerals Product Association
JP-S 2.34	To ensure Greater Manchester meets its carbon commitments then GHG emissions associated with Land Use, Land Use Change and Forestry (LULUCF) must be accounted for.	It is considered that taking policy JP-S2 as a whole, together with other policies in the Plan, provides sufficient guidance in relation to meeting Greater Manchester's commitment to carbon reduction and reduction in GHG emissions. No change is considered necessary.	The Wildlife Trusts
JP-S 2.35	The policy does not recognise the historic environment of the area that needs protecting. Also disagree with the IA scoring, as written the policy is considered to score negatively against Objective 16.	Policy JP-P2 provides the overall strategic policy approach to the historic environment. Specific references to the historic environment are made in policies JP-Strat-2, 3 and 5 alongside allocation policies where relevant. Therefore no change is considered necessary. The scoring within the Integrated Assessment is considered to be in accordance with the framework set out in the IA Scoping Report <a href="#">[02.01.01]</a>	Historic England
JP S 2.36	Update to KPI set out in p.392. Include indicators % GM peat mosses restored within first 5 years of plan period, % restored in 6-10 years etc.	The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. No change is considered necessary.	Friends of Carrington Moss

## PfE 2021 Policy JP-S 3 Heat and Energy Networks

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 3.1	Support for policy for heat networks in suitable locations across GM to increase efficiency. Although should be highlighted 'where viable to do so'.	<p>Support is noted. Local Area Energy Plans will provide a co-ordinated approach to identifying and implementing new district heat networks within <a href="#">Heat and Energy Network Opportunity areas</a> as set out in JP-S 3 Part 7. The policy is considered to flexible enough to encourage to allow a varied approach to low carbon heat and energy planning and no change is required. The proposed modification is not considered necessary.</p> <p>A Strategic Viability Assessment Part 1, <a href="#">[03.03.01]</a> pages 22/23, and technical appendices <a href="#">[03.03.03]</a> page 5 and Carbon and Energy Policy Implementation Study <a href="#">[04.01.01]</a> (pages 163-171) have been published alongside the PfE Plan.</p> <p>In line with NPPF, it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>	<p>Friends of the Earth</p> <p>The Wildlife Trusts</p>
JP-S 3.2	Heat and Energy networks should be addressed in separate policies, as they differ markedly	The policy wording within JPS-3 is considered flexible enough to allow a varied approach to low carbon heat and energy master planning, including consideration of technical and economic viability. Therefore no change is considered as necessary.	Peel L&P Investments (N) Ltd
Part 1	Heat / Energy Networks		
JP S 3.3	Part 1 is too generic and plan is not legible at a site level/ does not represent a Proposals Map	The Heat and Energy Network Opportunities Map can be considered in more detail on <a href="#">GM Mapping</a> Heat Network Opportunities. More evidence can be found in Carbon and Energy Topic Paper ( <a href="#">04.01.05</a> ) pages 33/34. Therefore no change is considered as necessary.	<p>Paul Roebuck</p> <p>Rowland Homes Ltd</p> <p>EON Plant Ltd</p> <p>Highgrove Strategic Land Ltd</p> <p>PD Northern Steels</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			PD Northern Trust Asset Mgt
JP-S 3.4	The policy is too prescriptive and should take a more flexible approach required so development can be adaptable to changing needs and technologies. Policy should set out when it is acceptable for new development not to connect to a heat or energy network.	The policy wording within JP-S3 is considered flexible enough to allow a varied approach to low carbon heat and energy master planning, including consideration of technical and economic viability.	Peel L&P Investments (N) Ltd EON Plant Ltd Northern Gateway Development Vehicle LLP Redrow/HIMOR Partnership GLP Trows LLP and BDW Trading Ltd PD Northern Trust Asset Mgt
JP-S 3.5	This policy is unsound as there is a sparse number of district heat networks currently and this is unlikely to increase in the near future; there is limited chance to adhere with this policy.	No change considered necessary. The delivery of district heat networks as part of PfE is critical to meeting low carbon objectives. It is considered that there is an appropriate and proportionate evidence base to support this policy, it can be found in Carbon and Energy Topic Paper ( <a href="#">04.01.05</a> ) pages 11, 25/26 and 31/32 (GM Carbon Implementation Plan <a href="#">04.01.01</a> ) page 35 ( <a href="#">GM Spatial Energy Plan</a> ).  Local Area Energy Planning which will provide a co-ordinated approach to identifying opportunities and laying new heat networks (page 58).	Home Builders Federation Taylor Wimpey
Part 2	Heat and Energy Network Opportunity Areas		
JP-S 3.6	This policy is unsound as it lacks flexibility as it requires developments outside of District Heat networks to develop their own. Text should be added that suggests that if carbon reduction can be achieved via another solution then developers should have the choice to develop and implement their own carbon offset projects along as they meet	The policy wording within JP-S3 is considered flexible enough to allow a varied approach to low carbon heat and energy master planning, including consideration of technical and economic viability. Carbon and Energy Topic Paper ( <a href="#">04.01.05</a> ) p 56-59.	Northern Gateway Development Vehicle LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	UKGBC principles and those of the Environment fund (eg. Heat source pumps).		
JP-S 3.7	Currently there is no regulator of district heat networks; residents could get a poor deal until this is in place.	This issue is considered outside of the scope of this plan. Therefore no change is considered necessary.	Home Builders' Federation
JP-S 3.8	Object to part 2 of this policy and object to the requirements set out, notably the criteria set out regarding the 'Heath and Energy Network Opportunity Areas' and the need to prepare a 'decentralised heat/energy network viability assessment' as overly onerous and will deter sites coming forward / hamper housing delivery	<p>PfE paragraph 5.20 (which references <a href="#">The Future of Heating</a> page 59-73) highlights that government analysis identifies heat/energy networks as a cost effective solution to the issue within areas of high heat density; and an important part of least-cost technologies to achieve UK wide decarbonisation. The dense urban nature of Greater Manchester and the scale of development means that there is potential for significant growth of heat networks aligned with strategic development sites.</p> <p>The feasibility of heat networks is considered in Carbon and Energy Implementation Plan (<a href="#">04.01.01</a>). A Strategic Viability Assessment (see Strategic Viability Assessment Part 1, <a href="#">[03.03.01]</a> pages 29-33, pages 63-65 and technical Appendices 2020 (<a href="#">03.03.03</a> page 5) has been published alongside the PfE Plan. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage, therefore no change is considered as necessary.</p>	Redrow Homes (Trafford) Redrow Homes (Lancs) GLP Trows LLP and BDW Trading Ltd Taylor Wimpey
JP-S 3.9	An appropriate balance needs to be struck between maximising heat and energy efficiency in buildings on the one hand, and minimising summertime overheating risk on the other.	District networks will also play a role in overheating and cooling in the future as part of its role in reducing greenhouse gases and in the transition to carbon neutrality, local energy plans will look at a range of solutions. <a href="#">Government's Future of Heating p.30/31. No change is considered as necessary.</a>	Redrow Homes (Trafford)
JP-S 3.10	An urgent priority must be for the Viability Assessment to be updated to test the impact of the policy requirement on the delivery of different types of development across GM and assumptions made to capacity of	See response in row JP-S3.8.	Peel L&P Investments (N) Ltd EON Plant Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	sites to deliver this infrastructure; particularly in relation to smaller urban sites. The onus should not be on the developer to demonstrate viability, but the LPA.		Highgrove Strategic Land Ltd Rowland Homes Ltd Redrow Homes (Trafford) Kate Mullineux PD Northern Steels Taylor Wimpey Redrow/HIMOR PD Northern Trust Asset Management
JP-S 3.11	Clarity required on Heat and Energy Network Opportunity Areas and where they are located as not clear in the policy or accompanying Carbon and Energy Topic Paper; also not viable in suburban housing developments as there is little evidence of district heating systems working at scale in the UK.	No Change is considered necessary. The delivery of heat networks as part of PfE is critical to meeting low carbon objectives. Figure 5.1 of the PfE Plan shows the heat and energy network opportunity areas within the PfE Plan area. Also, refer to evidence in The Carbon and Energy Topic Paper ( <a href="#">04.01.05</a> ) pages 11, 25/26 and 31/32 (GM Carbon Implementation Plan) page 35 (and <a href="#">GM Spatial Energy Plan</a> (page 58). Local Area Energy Planning provides a co-ordinated approach to identifying opportunities for laying new heat networks.  Also see response in row JP-S3.8.	Redrow Homes (Lancs) Highgrove Strategic Land Ltd Rowland Homes Ltd Redrow Homes (Trafford) EON Plant Ltd PD Northern Steels Kate Mullineux The Wildlife Trust Boys and Girls Club of GM Peel L&P Investments (N) Ltd
JP-S 3.12	Important to retrofit existing heat systems.	PfE policy JP-S2 promotes the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling. No change is therefore considered necessary.	Simon Robertson
JP-S 3.13	Propose that 10-dwelling threshold is piloted and tested prior to becoming a requirement.	As set out in JP-S2 Part a) major development of '10 dwellings or more' is considered to be an appropriate threshold in which introduce a	Greater Manchester Housing Providers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		requirement around heat network opportunities. No change is therefore considered necessary.	

## PfE 2021 Policy JP-S 4 Resilience

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Reasoned Justification		
JP-S4.1	The New Carrington Policy is not justified as it does not align with the aims for resilience set out in Policy JP-S 4.	PfE allocation policies are considered to be in accordance with JP-S 4. PfE JPA 33 New Carrington is considered to have a proportionate evidence base to support the allocation of the site, details of which can be found in the Site Allocation Topic Paper <a href="#">[10.09]</a> .	Friends of Carrington Moss
JP-S4.2	Policy JP-S 4 does not explain how the policy will be met within the Reasoned Justification.	No change is considered necessary. PfE Policy JP-S 4 is a strategic planning policy considered to reflect the government's requirement for resilience in accordance with paragraphs 97, 130, 152 and 153 of the NPPF.  PfE paragraphs 5.26 to 5.28 of the Policy Reasoned Justification clearly sets out Greater Manchester's commitment to resilience through its membership within the <a href="#">Resilient Cities Network</a> and the recent publication of the <a href="#">Greater Manchester Resilience Strategy 2020-2030</a> . Policy JP-S 4 is considered to align with the commitments and priorities of both the Network and Strategy.	Janine Lawford
JP-S4.3	Plan is unsound. Site allocations are unable to meet tests of resilience including flood risk and other environmental considerations.	No change is considered necessary. PfE is considered to have been prepared in accordance with legal and procedural requirements set out in NPPF paragraph 35 and is considered to be sound.  PfE allocation policies are considered to be in accordance with JP-S 4 and the Plan's commitment for a resilient Greater Manchester through their contribution toward the delivery of new affordable homes and/or employment opportunities, provide and contribute towards education and health facilities, protect and enhance green infrastructure and the natural environment and mitigate against the impacts of climate change including flood risk as well as incorporating mitigation measures as appropriate.	Save Manchester Green Belt Group Stephen Cluer Peter Stanyer Linus Mortock Andrew Mair Valerie Dixon E Bowles Samantha Dugmore Kim Scragg Martin Rigby Northern Gateway Development Vehicle LLP

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Carol Lee Sheila Tod Jamie Bentham David McLaughlin Wolstenholme Fold Farm Mark Brodigan C Smith Glenn Dillon Elizabeth Hogan Chris Green Raymond Chamberlain Katherine Grant Marie Holder Janet Taylor
JP-S4.4	Policy wording could be improved by increasing the ambition for new development to further enhance resilience measures and that policy requirements are clear, unambiguous, deliverable and avoid duplication.	PfE Policy JP-S 4 contributes towards the Plan's aim for Greater Manchester to be one of the most resilient places in the world (paragraph 5.24) and is in accordance with paragraphs 97, 130, 152 and 153 of the National Planning Policy Framework. Whilst amending the policy wording could further enhance and clarify resilience measures it is not considered to be a soundness issue, therefore no change is proposed.	Peel L&P Investments (North) Ltd
JP-S4.5	The proposed policy covers a wide range of issues identified within NPPF and comes across as a list of objectives rather than a clear planning policy requirement and it is unclear which policy points are development requirements.	No change is considered necessary. PfE Policy JP-S 4 contributes towards the Plan's aim for Greater Manchester to be one of the most resilient places in the world (PfE paragraph 5.24) and is considered to be in accordance with NPPF paragraphs 97, 130, 152 and 153. JP-S 4 also aligns with the <a href="#">Greater Manchester Resilience Strategy 2020-30</a> by positively seeking to ensure that Greater Manchester is able to reduce chronic stress and shocks by planning to prevent physical, social, economic and environmental challenges.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels Boys and Girls Club of Greater Manchester Peter and Diane Martin
JP-S4.6	Supports the policy in terms of its approach to mitigation measures for climate change, adaptation and flood risk and community resilience such as the contribution towards the delivery of affordable homes.	No change is considered necessary. Support welcomed.	Greater Manchester Housing Providers Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S4.7	Many of the proposals within the Plan will undermine the aims of this policy particularly the proposals for Green Belt release.	<p>No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a></p>	Gillian Boyle
Part 2	Retrofitting Buildings		
JP-S4.7	Support for this policy as a priority.	Support welcomed.	Joanne Koffman Maureen Buttle
JP-S4.8	Careful design and appropriate measures required when retrofitting historic buildings; this should be referenced in the policy to avoid harm to heritage assets.	<p>No change is considered necessary. PfE is a strategic planning document and should be read as a whole. The plan is considered to be consistent with paragraph 190 of the NPPF in relation to the historic environment. The protection and enhancement of the historic environment has been enshrined throughout PfE and more specifically within Policy JP-P 2 Heritage and Site Allocations where appropriate.</p> <p>The importance of the historic environment in Greater Manchester and the positive impact it has on the social, economic and built/natural environment has been assessed in detail within The Historic Environment Background Paper <a href="#">[08.01.12]</a> and individual site allocation historic environment assessments <a href="#">[08.01.01 - 08.01.11]</a> in order to set out a positive strategy and inform policy and allocations within PfE.</p>	Historic England
JP-S4.9	Amendment to policy required to give greater resilience to a climate change agenda including development of brownfield sites and review of empty housing/ under-used buildings and sites.	No change is considered necessary. PfE Plan sets out a very clear preference of using previously developed (brownfield) land (Objectives 2 and 3) and vacant buildings to meet development needs in line with paragraphs 119 to 120 of the NPPF. Previously developed sites are	Julie Halliwell Gillian Boyle

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		included within the PfE baseline land supply have been identified within district Brownfield Land Registers (BLR) and Strategic Housing Land Availability Assessments (SHLAA) in line with paragraphs 68 and 69 of the NPPF and <a href="#">guidance</a> .	
Part 4	Providing adaptable buildings and places		
JP-S4.10	Pro-environmental investment required to stop impacts of climate change.	<p>No change is considered necessary. PfE is considered to reflect the government's requirement for resilience in accordance with paragraph 153 of the NPPF which states that Plans should take a proactive approach to mitigating and adapting to climate change.</p> <p>PfE paragraphs 5.5 to 5.7 highlight the vision set out within <a href="#">Our People, Our Place The Greater Manchester Strategy</a> to be at the forefront of action on climate change and to make its fair contribution to international commitments. In order to achieve this vision the <a href="#">5-Year Environment Plan for Greater Manchester 2019-2024</a> sets out its aims to ameliorate/mitigate against future impact of climate change within the city region. Such mitigation measures have been incorporated into PfE and are set out in objectives 7 and 8 and Policy JP-S 4 Resilience of the Plan.</p>	Simon Robertson
Part 6	Designing indoor and outdoor environments		
JP-S4.11	Development will impact on global warming, pollution/ climate change, increase in carbon and natural habitats.	<p>No change is considered necessary. PfE is considered to reflect the government's requirement for resilience in accordance with paragraphs 97, 130 and 152 and 153 of the NPPF. Policy JP-S 4 also explains that development will be managed so as to increase considerably the capacity of its citizens, communities, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges, including climate change.</p> <p>PfE paragraphs 5.5-5.7 highlights that <a href="#">Our People, Our Place The Greater Manchester Strategy vision for Greater Manchester</a> is to be at the forefront of action on climate change and to make its fair contribution to international commitments. To support the Vision in the Strategy the <a href="#">5-Year Environment Plan for Greater Manchester 2019-2024</a> was published</p>	<p>Margaret Fulham Colin Williams Kate Tod Mark Brodigan C Smith Jeremy Williams Chris Green Stephen Cluer Christopher Russell Lucy Marsden Philip Smith-Lawrence Trevor Widdop</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>setting out its aims to ameliorate/ mitigate against future impact of climate change within the city region. The evidence, aims and objectives of both the Strategy and 5-Year Plan have informed policy on climate change throughout PfE.</p> <p>PfE Section 5 Sustainable and Resilient Places and Section 7 Greener Places aims to mitigate impacts on climate change, carbon, air quality and natural habitats by incorporating measures, recommendations and targets set out in the 5-Year Environment Plan for Greater Manchester 2019-2024 into PfE.</p>	
Part 7	Green Infrastructure		
JP-S4.12	Concern about the implementation of this policy and how it will be paid for; large scale projects should be supported by the GMCA.	<p>No change is considered necessary. The GMCA is committed to the Government's approach to deliver a better natural environment ensuring that it is accessible for everyone to connect to in line with <a href="#">A Green Future: Our 25 Year Plan to Improve the Environment</a>. In addition the Greater Manchester Landscape Character and Sensitivity Assessment (07.01.06), <a href="#">5-Year Environment Plan</a> and the <a href="#">Natural Capital Investment Plan</a> (PfE paragraphs 8.1 and 12.2) further support the role of natural assets and green infrastructure.</p> <p>PfE Section 12 Delivering the Plan also provides the Reasoned Justification and Policies to guide delivery of the plan as a whole and highlights the importance of working in partnership with delivery agencies and organisations, landowners and developers, the development management process and other regulatory functions, grants and funding and the use of section 106 agreements in order to implement policies and proposals within PfE (PfE paragraph 12.3).</p>	Edward Beckmann Paul Roebuck Northern Gateway Development Vehicle LLP Heather Bebbington Pugh Roy Chapman
JP-S4.13	This policy needs to be extended to 'retrofit' existing areas, with maps indicating important potential links. These could be created at some point in future, when land is available.	No change is considered necessary. PfE Section 8 Greener Places recognises the importance and benefits of the green infrastructure network within Greater Manchester. Policy JP-G 2 Green Infrastructure Network sets out the strategic approach to the protection, management and enhancement of our Green Infrastructure in order to protect and	Edward Beckmann

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		enhance the ecosystem services and how this will contribute the delivery of the GMCA Local Nature Recovery Strategy (LNRS) and the development of a Nature Recovery Network for GM (NRN). A map identifying biodiversity strategic priorities and opportunities which will underpin the Greater Manchester LNRS and the NRN will be developed as a first iteration, prior to engaging wider stakeholders in its further development. In addition PfE paragraph 10.1 states that 'one of the <a href="#">Greater Manchester Strategy</a> 's ten priorities is to deliver an integrated network with world-class connectivity that keeps Greater Manchester moving and that drives prosperity whilst protecting the environment, improving air quality and transitioning to a zero carbon future'.	
JPS4.14	Focus of the policy should be on resilience to climate change.	No change is considered necessary. PfE Sustainable and Resilient Places Chapter 5 contains strategic policies consistent with the NPPF in relation to climate change. The policies are supported by a proportionate evidence base: further details can be found in Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> , Carbon and Energy Implementation Plan <a href="#">[04.01.01]</a> . The effects of climate change is a key issue against which the plan is assessed within the Integrated Assessment (IA) of GMSF Scoping Report 2021 <a href="#">[02.01.01]</a> Section 5.14, page 208 and IA GMSF Main Report 2020 <a href="#">[02.01.02]</a> page 2 and IA GMSF Addendum <a href="#">[02.01.05]</a> pages 3 and 4. No change is considered necessary as this policy approach is consistent with the NPPF as a whole, national climate change policy and legislation.	Friends of Carrington Moss Jamie Bentham Friends of the Earth John Dawson Julie Halliwell Simon Robertson Ann Guilfoyle
JP-S4.15	Additional evidence is required to justify policy; including alternative options.	No change is considered necessary. It is considered that an appropriate and proportionate evidence base has been developed to justify the policy and detailed within which Policy JP-S 4 Resilience Reasoned Justification (PfE paragraphs 5.24 to 5.28).	Friends of Carrington Moss Andrew Scanlon
JP-S4.16	Achievement of resilience goals must be monitored through KPIs.	The monitoring framework in Chapter 12 is considered to provide an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S4.17	Concern that the protection and restoration of GM's peatlands, which is essential to supporting GM to achieve its resilience goals, is not a requirement of the Plan.	<p>No change is considered necessary. PfE Policy JP-S 4 Resilience is considered to meet the government's requirements for resilience in accordance with paragraphs 97, 130 and 152 and 153 of the National Planning Policy Framework.</p> <p>Whilst strategic policy to guide the retention, enhancement and restoration of lowlands and wetlands is set out within Policy JP-G 4, PfE paragraph 8.30 notes that some sections of undeveloped mossland are considered appropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth. The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations. The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out PfE case for exceptional circumstances to amend the Green Belt boundary in order to meet the overall development needs.</p>	Friends of Carrington Moss
Part 8	Taking an integrated catchment-based approach to managing flood risk		
JP-S4.18	Flooding farmers' fields/ loss of agricultural land will impact on food demand/ production	<p>No change is considered necessary. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (PfE paragraphs 1.41 to 1.46). However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on high grade agricultural land is necessary as it is critical to the delivery of wider development proposals (PfE paragraph 8.53).</p> <p>The release of greenfield and Green Belt land has, however been kept to a minimum. The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including consideration of planning constraints, for example, but not limited to agricultural land grades on site and flood risk (paragraph 6.44). Site allocations are supported by Level 1 and Level 2 Strategic Flood Risk Assessment <a href="#">[04.02.18]</a> and further details can be found in allocation topic papers <a href="#">[10.01 to 10.10]</a> where relevant.</p>	Samantha Dugmore Jamie Bentham Chris Green

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Part 9	Maintaining a very high level of economic diversity across Greater Manchester;		
JP-S4.19	Economic growth should not be at the expense of meeting the other objectives in the plan.	No change is considered necessary. PfE is a strategic development plan which aims to address the social, economic and environmental objectives of sustainable development outlined in paragraphs 8 and 11 of the NPPF and should be read as a whole.	Laura Ettrick
JP-S4.20	GM's economy is diverse and therefore resilient against short term shocks/ emergencies.	No change is considered necessary. Support welcomed	Peel L&P Investments (North) Ltd
JP-S4.21	Recognises and supports the focus on the Core Growth Area of the City Centre, the Quays, Central Park, the Etihad Campus and Trafford Park, and their importance in driving the economic growth and resilience of the whole city region.	No change is considered necessary. Support welcomed.	Greater Manchester Housing Providers
JP-S4.22	Understands the importance of ensuring that there is a sufficient and suitable supply of employment land available to achieve this objective. It is therefore concerned over the amount of employment land currently being identified for residential development over the plan period.	No change is considered necessary. PfE is a strategic development plan addressing the social, economic and environmental objectives of sustainable development by meet the development needs of the Plan area including housing and other uses (NPPF paragraphs 8 and 11). The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> and the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> .	Taylor Wimpey
Part 10	Delivery of affordable homes		
JP-S4.23	Policy is not ambitious enough as there many on housing waiting lists and this will not meet GM's need for affordable housing and no mention of homes for older persons.	No change is considered necessary. PfE is considered to reflect the government's objective to significantly boost the supply of homes, for strategic policies to be informed by a local housing need assessment and that the housing needed for different groups in the community should be assessed and reflected in planning policies as set out in paragraphs 60, 61 and 62 of the National Planning Policy Framework.  The Greater Manchester Strategic Housing Market Assessment Chapter 7 Affordable Housing Need Assessment <a href="#">[06.01.02]</a> , pages 207 to 228, provides a detailed analysis on the affordable housing requirement in Greater Manchester.	Save Manchester Green Belt Group Stephen Cluer Home Builders Federation Sheila Tod

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S4.24	Considers the delivery of 'at least 50,000 new affordable homes' to be a very ambitious target. Concern that the Plan seeks to direct a significant proportion of growth towards previously developed sites within the urban areas of Manchester, Salford and Trafford, on the premise that it will address existing dereliction and poorly used sites as well as reduce the need to release greenfield and Green Belt land.	<p>No change is considered necessary. PfE aims to support the Government's objective of significantly boosting the supply of homes, for strategic policies to be informed by a local housing need assessment and that the housing needed for different groups in the community should be assessed; as reflected in planning policies as set out in paragraphs 60, 61, 62 and 119 of the National Planning Policy Framework. In order to meet this requirement the Greater Manchester Strategic Housing Market Assessment <a href="#">[06.01.02]</a>, (Chapter 7 Affordable Housing Need Assessment pages 207 to 228) provides an analysis of the affordable housing requirement in Greater Manchester.</p> <p>In line with NPPF paragraphs 119 and 121, the Plan also seeks to promote the development of brownfield land within the urban area and to use land efficiently. Chapter 4 (paragraphs 4.1 to 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>.</p>	Taylor Wimpey Kate Tod
Part 12	Supporting healthier lifestyles		
JP-S4.25	Concern over loss of greenspace and Green Belt to development on residents' physical and mental health and air quality.	<p>No change is considered necessary. The Plan, in line with NPPF paragraphs 119 and 121, seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>.</p> <p>PfE is also considered to be in line with paragraph 92(c) of the NPPF which requires planning policies should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. The Natural Environment Topic Paper <a href="#">[07.01.26]</a></p>	Mark Brodigan Jamie Bentham Julie Halliwell David Hawes David McLaughlin Chris Waterfield

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		addresses identified local health and well-being needs through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling and allocations are supported by local evidence as appropriate.  Policy JP-S6 Clean Air is a strategic planning policy. Consistent with the NPPF and sets out an appropriate policy framework for Clean Air and supports the ambition to reduce air pollution. No change considered necessary.	
Part 13	Hazardous Installations		
JP-S4.26	Potential issues with building on greenspaces and contaminated land	No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. The Plan, in line with paragraphs 119 and 121 of the NPPF, seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. The requirement to secure the remediation of contaminated land and stability issues are dealt with within PfE Policies JP-S 1 and JP-S 5 point 6.	Linus Mortlock Save Greater Manchester's Green Belt Peter Stratton Janet Millett
JP-S4.27	How environmental objectives must be balanced to ensure that mutual benefits are achieved for the historic environment with areas such as climate change, resilience, or flood risk.	No change is considered necessary. This is a strategic policy and along with other policies relating to historic environment including Policy JP-P 2 Heritage is considered to deliver a positive approach to heritage, in line with NPPF paragraph 190. Evidence of this is found in the Historic Environment Background Paper <a href="#">[08.01.12]</a> and individual site allocation historic environment assessments <a href="#">[08.01.01 to 08.01.11]</a> .	Historic England
JP-S4.28	The carbon, flood risk and resilience policies need to be worded more carefully so it is compatible with the objective of the conservation and enhancement of the historic environment.	No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. The importance of the historic environment in Greater Manchester is detailed within The Historic Environment Background Paper <a href="#">[08.01.12]</a> . Policy JP-P 2 Heritage and individual site allocation historic environment assessments <a href="#">[08.01.01 to 08.01.11]</a> .	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S4.29	Concerned about the impact on character and appearance and historic fabric including ground (street) surfaces and underground archaeology.	See response in row JP-S4.28	Historic England
JP-S4.30	New housing requires new supporting healthcare, education and emergency services, and transport infrastructure.	No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1, JP-P5, JP-P6 and JP- D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.	Paul Roebuck Frances Davidson Andrew Mair Save Greater Manchester's Green Belt Gary West Janine Lawford Sheila Tod David McLaughlin Kate Tod Mark Brodigan Alison Doherty C Smith Jeremy Williams Patricia Hay Stephen Cluer Christopher Russell Lucy Marsden Philip Smith-Lawrence Jamie Bentham
JP-S4.31	There was a concern at extent of GM's reliance on imported food, and lack of (local) facilities to deal with war, famine or major disease outbreak.	This is not a matter considered by the plan. No change is considered necessary.	Paul Roebuck Peter Christie

## PfE 2021 Policy JP-S 5 Flood Risk and the Water Environment

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Paragraph 1	An integrated catchment based approach to managing flood risk		
JP-S5.1	Agrees overall with Policy JP-S 5 and its aims	Support welcomed.	Royal London Asset Management RLAM Peel L&P Investments
JP-S5.2	The policy would be more effective if it provided greater clarity as to how each of the components will be assessed in decision making and/or the policy is adjusted to make it clear future Local Plan's will set more detailed policies.	Amendment of the policy to make it clear that future local plans will set more detailed policies is not considered to be a soundness issue and therefore no change is considered as necessary. Policy JP-S 5 is considered to provide an appropriate strategic policy framework to manage flood risk having been informed by a Level 1 and Level 2 Strategic Flood Risk Assessments. A summary of this evidence base used to inform policy and site allocations is provided within the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a> . Both the Sequential and Exception Test have been satisfied in accordance with the NPPF.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Boys and Girls Club of Greater Manchester Wolstenholme Fold Farm
JP-S5.3	Recommends that the issues of flood risk and surface water management are dealt with as two separate policies.	Separating the issues of flood risk and surface water into two separate policies is not considered to be a soundness issue and therefore no change is considered necessary. Policy JP-S 5 is considered to provide an appropriate strategic policy framework to manage flood risk having been informed by a Level 1 and Level 2 Strategic Flood Risk Assessments. A summary of this evidence base used to inform policy and site allocations is provided within the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a> .	United Utilities
JP-S5.4	Strongly supports the measures proposed in JP-S 4, 5 & 6 to support individual and community resilience.	Support welcomed.	Greater Manchester Housing Providers
JP-S5.5	The policy on flood risk and the water environment lacks detail in order to ensure that Greater Manchester is fully responsive to the challenge of climate change, flooding, surface water management	No change is considered as necessary. Policy JP-S 5 is considered to provide an appropriate strategic policy framework to manage flood risk having been informed by a Level 1 and Level 2 Strategic Flood Risk Assessments, which include modelling and recommending mitigation	United Utilities Alison Doherty Woodford Neighborhood Forum

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	and water management including for example on greenfield/ Green Belt sites and those rich in biodiversity.	measures to alleviate flood risk due to the potential effects of climate change. A summary of the evidence base used to inform policy and site allocations is provided within the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a> .	Raymond Chamberlain Janet Brooks Chris Green Friends of Carrington Moss
Part 1	Returning rivers to a more natural state, where practicable, in line with the North West River Basin Management Plan;		
JP-S5.6	Concern that development in areas where there are natural and manmade waterways will impact on drainage and increase flood risk to properties within the local area.	No change is considered necessary. JP-S 5 is considered to provide an appropriate strategic policy to manage flood risk. The PfE site selection process <a href="#">[03.04.01]</a> (paragraph 6.44) included the consideration of flood risk. An initial Level 1 Strategic Flood Risk Assessment <a href="#">[04.02.01]</a> was undertaken, followed by a more detailed Level 2 Flood Risk Assessment <a href="#">[04.02.19]</a> where necessary, a summary of which is provided within the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a> .	Valerie Dixon
JP-S5.7	Supports the approach to SUDs, rejuvenating river quality, sensibly placed developments and increasing flood resilience.	Support welcomed.	Friends of the Earth
JP-S5.8	The alteration of the physical characteristics of a water system could potentially harm archaeological and palaeo-environmental remains.	No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. PfE Policy JP-S 5 is in accordance with NPPF Section 14 (paragraphs 159 to 169) and provides an appropriate strategy to manage flood risk.  The importance of the historic environment in Greater Manchester has been assessed in detail within the Historic Environment Background Paper <a href="#">[08.01.12]</a> which has informed Plan policy including JP-P 2 Heritage. Individual site allocation historic environment assessments <a href="#">[08.01.01 to 08.01.11]</a> have informed the development of allocation policies where relevant. Specifically in respect of assets of archaeological interest, policy JP-P2 directs development proposals should identify any such assets and use this information to avoid harm or minimise it through design and appropriate mitigation.	Historic England

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Detailed matters relating to applications that are considered to have an impact on the significance of heritage assets will be assessed as part of the development management process in line with NPPF paragraphs 28, 194-197.	
JP-S5.9	This policy whereby these rivers and areas are restored to their natural condition could, in some cases, have serious implications food production and agriculture.	<p>No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole.</p> <p>PfE Policy JP-S 5 is considered to provide an appropriate strategic framework to manage flood risk. Policy JP-S 5 explains that rivers would be returned to a natural state, where practicable in line with the <a href="#">North West River Basin Management Plan</a>.</p> <p>The Plan also accords with NPPF paragraph 174 which requires planning policies to contribute to and enhance the natural and local environment and that development should, wherever possible, help to improve local environmental conditions such as water quality, take into account relevant information such as river basin management plans. The summary of the evidence base to support strategic Policy JP-G 3 River Valleys and Waterways is set out in the Natural Environment Topic Paper <a href="#">[07.01.26]</a>.</p>	The National Farmers' Union
Part 2	Working with natural processes to manage flood risk		
JP-S5.10	Support for measures to address the current and likely future increases in river and surface flooding.	Support welcomed.	Woodford Neighbourhood Forum
JP-S5.11	Development impinging into areas of basin peat will inevitably reduce the size of the basin, thereby increasing the amount of water held in the remaining basin and increasing the likelihood of flooding events in that area and possibly adjacent areas.	No change is considered necessary. The PfE site selection process <a href="#">[03.04.01]</a> (paragraph 6.44) included the consideration of flood risk and has also been informed by a Level 1 and Level 2 Flood Risk Assessments <a href="#">[04.02.01]</a> and <a href="#">[04.02.19]</a> . The Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a> provides a concise summary of the evidence base to support the development of PfE and site allocation policies.	Edward Beckmann
JP-S5.12	Climate change (severe weather events) and development is putting pressure is on the drainage of agricultural land. However, many	The PfE site selection process <a href="#">[03.04.01]</a> (paragraph 6.44) included the consideration of flood risk. An initial Level 1 Strategic Flood Risk	National Farmers' Union

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>activities on agricultural land can help to alleviate flooding downstream such as reducing soil compaction, tree planting and increasing soil permeability; schemes should be developed in partnership with farmers and should also be properly funded.</p>	<p>Assessment [04.02.01] was completed to support the development of the Plan (Policy JP-S 5) followed by a more detailed Level 2 Flood Risk Assessment [04.02.19] where necessary, undertaken in accordance with the NPPF and <a href="#">Planning Practice Guidance</a>. A summary of the evidence informing Policy JP-S 5 and site allocations is contained within the Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20].</p> <p>Policy JP-G2 recognises that the green infrastructure network has a range of functions including flood management and the policy explains that wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network. Policy JP-G7 also aims to significantly increase tree cover through a range of measures.</p> <p>In order to implement the Plan PfE Policy JP-D 1.2 also 'promotes collaboration and synchronisation of investment plans between ourselves and the main infrastructure providers'. For example the government Environmental Land Management Scheme aims to support farmers to manage their land in an environmentally sustainable way (<a href="https://www.gov.uk/government/publications/environmental-land-management-schemes-overview/environmental-land-management-scheme-overview">https://www.gov.uk/government/publications/environmental-land-management-schemes-overview/environmental-land-management-scheme-overview</a>).</p>	
JP-S5.13	<p>Examples of techniques which could be used to "flood-proof" homes include planting trees and creating wetland habitats; the very features that are currently preventing flooding will be lost as a result of development.</p>	<p>No change is considered necessary. PfE paragraph 5.36 and Policy JP-S 5 point 2 supports the use of natural processes and adopting a natural flood management approach as measures to assist in managing flood risk. Policy JP-G 2 recognises that the green infrastructure network has a range of functions including flood management and the policy explains that wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network. Policy JP-G 7 also aims to significantly increase tree cover through a range of measures.</p>	<p>Friends of Carrington Moss</p>

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		However, when determining planning applications, the local planning authority will, where appropriate, require applications to be supported by a site specific flood risk assessment in line with NPPF paragraph 167.	
JP-S5.14	Concern over the loss of peatlands and wetlands which have the ability to reduce flooding, carbon sequestration and clean water strategies.	No change is considered necessary. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (PfE paragraphs 1.41 to 1.46). However, given the scale of development required to meet the needs of Greater Manchester some sections of undeveloped mossland, will be considered appropriate for future development as they are well located to make a notable contribution to delivering more balanced and inclusive growth (PfE paragraph 8.30).	Friends of Carrington Moss
Part 3	Locating/ designing development to minimise the flood risk.		
JP-S5.15	Support for policy.	Support welcomed	Friends of the Earth
JP-S5.16	Measures should be put in place within new developments that would prevent flooding elsewhere.	No change is considered necessary. Measures to prevent flooding elsewhere are set out within JP-S 5 policy point 3 which states that 'An integrated catchment based approach will be taken to protect the quantity and quality of water bodies and managing flood risk, by: Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding'.	Save GM Green Belt Alison Doherty
JP-S5.17	Concern that large scale new development will increase flood risk issues, such as surface water, for existing local residents and housing areas. Therefore, developments should be suitably mitigated and safely assessed and egressed without creating flooding elsewhere. Any sites without these measures should be deleted from PfE.	No change is considered necessary. PfE is considered to be supported by a proportionate and appropriate evidence base which includes the site selection process [03.04.01] (paragraph 6.44) and the Level 1 Strategic Flood Risk Assessment [04.02.01] followed by Level 2 Flood Risk Assessment [04.02.19]. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support the development of PfE and site allocations.	David McLaughlin C Smith Stephen Cluer Simister Village Community Association Philip Smith-Lawrence Juliet Eastham June Clough Valerie Dixon Rachel Mellish Andrew Scanlon Save GM Green Belt

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Christopher Russell Ann Guilfoyle
JP-S5.18	Greater consideration of flood risk should be given at this stage of the Plan process, prior to adoption, to ensure that the allocations are appropriate and deliverable. Leaving these issues to the design stage is simply inappropriate as they fall to the principle of development.	No change is considered necessary. PfE is considered to be supported by a proportionate and appropriate evidence base which includes the site selection process [03.04.01] (paragraph 6.44), which gave a consideration of flood risk and the Level 1 Strategic Flood Risk Assessment [04.02.01] followed by Level 2 Flood Risk Assessment [04.02.19]. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support the development of PfE and site allocations.	David McLaughlin C Smith Stephen Cluer Simister Village Community Association Philip Smith-Lawrence Juliet Eastham Christopher Russell
JP-S5.19	Concern that continued development will increase surface water discharge in to local water courses.	No change is considered as necessary. PfE Policy JP-S 5 points 4 and 5 are considered to satisfy this concern at a strategic level.	Linus Mortlock
Part 4	Expecting developments to manage surface water runoff		
JP-S5.20	Policy wording is not considered to be clear.	JP-S 5 is a strategic policy which is considered to be consistent with NPPF and provide an appropriate strategy to manage flood risk. Whilst an amendment to wording may improve the clarity of the policy point 4, it is not considered to be a soundness issue, therefore no change is proposed.	Emery Planning
JP-S5.21	Prioritise green SuDS over grey infrastructure.	No change is necessary. PfE policy JP-S 5 is considered to be consistent with the NPPF and provide an appropriate strategy to manage flood risk. Policy points 4 and 5 have been written in line with mitigation measures recommended in the Level 1 Strategic Flood Risk Assessment [04.02.01] (paragraph 7.6.6).	Pete Stringer
JP-5.22	The need for SuDS and other types of sustainable drainage solutions should be established through flood risk and drainage technical work and assessments. Wording should be amended to reflect requirements for development.	PfE is considered to provide an appropriate strategy to protect the quantity and quality of water bodies and to manage flood risk at the strategic level by incorporating the outcomes and recommendations of the Level 1 and Level 2 Strategic Flood Risk Assessments [04.02.01 and 04.02.18]. Policy JP-S 5 identifies a wide range of measures at the strategic level to manage flood risk including Sustainable Drainage System (SuDS) schemes as detailed in policy points 4 and 5. PfE	Redrow Homes (Trafford) Home Builders Federation Royal London Asset Management RLAM

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>paragraph 5.36 also states that SuDs are mandatory for major development unless clear evidence indicates that they would be inappropriate.</p> <p>Where appropriate, applications should be supported by a site-specific flood-risk assessment (FRA) in line with NPPF paragraph 167 and planning <a href="#">guidance</a>. The FRA should identify site specific flood mitigation measures, including but not limited to SuDS, necessary in relation to the proposed development including its design and layout. Therefore no change is considered as necessary.</p>	
JP-S5.23	Emerging policy should set an expectation that all applications will be required to submit clear evidence that the hierarchy for surface water management has been fully investigated to ensure that flood risk is not increased elsewhere and foul drainage strategy forms a part of this. Also that water efficiency measures are considered.	No changes are required as Policy JP-S 5 is considered to be consistent with national policy and provide an appropriate strategy to manage flood risk.	United Utilities
Part 5	Design and Management of SuDs		
JP-S5.24	Supports the approach to SUDs, rejuvenating river quality, sensibly placed developments and increasing flood resilience (as well as other measures).	Support Welcomed	Friends of the Earth
JP-S5.25	Policy sets out a positive and pragmatic approach.	Support welcomed	Peel L&P Investments (North) Ltd
Part 6	Securing the remediation of contaminated land		
JP-S5.26	Policy should be mindful that not all brownfield land is suitable for development, due to flooding and contamination.	No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole. The Plan, in line with paragraphs 119 and 121 of the NPPF, seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. The requirement to secure the remediation of contaminated land and stability issues are dealt with within PfE Policies JPS 1 and JP-S 5 point 6.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels PD Northern Trust Asset Management

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S5.27	Opportunity to improve existing flood storage capacity for the benefit of other areas downstream.	No change is considered as necessary. PfE Policy JP- S 5 point 3 states that 'An integrated catchment based approach will be taken to protect the quantity and quality of water bodies and managing flood risk, by: Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding'.	Morland Capital Partners No.1 Ltd
Part 8	Conserving water and maximising water efficiency in new development.		
JP-S5.28	More detail is required in this policy as to how this will be achieved; in line with optional water efficiency standard set out in Building Regulations.	Policy JP-S 5 is considered to be consistent with the NPPF and provides an appropriate strategic strategy to manage flood risk. The detailed matter of water efficiency measures in new developments detailed in policy point 8 will be a matter for district local plans or further guidance to determine. Therefore no change is considered as necessary.	United Utilities
JP-S5.29	This policy can be strengthened and made sound by including the following commitments: <ul style="list-style-type: none"> <li>• a commitment to confirmation that development will only take place in areas that are subject to the lowest risk of flooding</li> <li>• the words "wherever possible" should be removed from the Policy (page 96, (paragraph 5.33??)).</li> <li>• the KPIs should be updated to cover all aspects of this Policy.</li> </ul> Standard KPI wording	PfE Policy JP-S 5 is consistent with NPPF Section 14 paragraphs 159 to 169 and provides an appropriate strategy to manage flood risk which is a key objective of PfE (page 41, Objective 8) by setting out the integrated catchment based approach to protect the quantity and quality of water bodies and managing flood risk at a strategic level.  Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.  The site selection process [03.04.01] for PfE included the consideration of flood risk (paragraph 6.44). The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence and where necessary allocations have been informed by the Level 2 Strategic Flood Risk Assessment [04.02.18]. Further details of which can be found in the relevant allocation topic papers [10.01 to 10.10].	Friends of Carrington Moss
JP-S5.30	The policy could be strengthened and made sound by including the following commitments:	No change is considered necessary. PfE Policy JP-S 5 is considered to be consistent with NPPF Section 14 and provides an appropriate strategy	Friends of Carrington Moss

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<ul style="list-style-type: none"> <li>• a commitment to confirmation that development will only take place in areas that are subject to the lowest risk of flooding</li> <li>• the words “wherever possible” should be removed from the Policy (page 96, (paragraph 5.33??)).</li> <li>• the KPIs should be updated to cover all aspects of this Policy.</li> </ul>	<p>to manage flood risk by setting out the integrated catchment based approach to protect the quantity and quality of water bodies and managing flood risk at the strategic level. The Plan is supported by a proportionate and appropriate evidence base including the PfE site selection process [03.04.01] (paragraph 6.44) and the Level 1 and Level 2 Strategic Flood Risk Assessments as summarised in the Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20].</p> <p>The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.</p>	
JP-S5.31	Concern that there is flooding in all boroughs.	The Policy is considered to be supported by an appropriate and proportionate evidence base. A summary of which can be found within the Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20]. This includes a Level 1 Strategic Flood Risk Assessment [04.02.01] and where appropriate a Level 2 Flood Risk Assessment [04.02.18].	Tracy Owen Janine Lawford
JP-S5.32	Concern that building on open fields/ floodplains/ river valleys/ areas of flood risk will lead to flooding in other areas.	PfE Policy JP-S 5 is considered to be consistent with NPPF and provide an appropriate strategy to manage flood risk by setting out an integrated catchment based approach to protect the quantity and quality of water bodies and managing flood risk at a strategic level. This includes the requirement to locate and design development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding (policy point 3). NPPF Para 167 also explicitly requires that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere.	Peter Stratton Trevor Widdop Colin Williams Rachel Mellish Janet Brooks Susan Southward Raymond Chamberlain Friends of Carrington Moss Gary Taylor June Clough

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The site selection process [03.04.01], (paragraph 6.44) included the consideration of flood risk and PfE is supported by a Level 1 Strategic Flood Risk Assessment [04.02.01] and where necessary a Level 2 Strategic Flood Risk Assessment [04.02.18]. As summarised in the Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] and allocation topic papers [10.01 to 10.10].	Save Greater Manchester Green Belt Stephen Cluer Warburton Parish Council Elizabeth Hogan Colin Walters
JP-S5.33	Development should only be located on sites that are at low risk of flooding	The site selection process [03.04.01] included the consideration of flood risk (paragraph 6.44) and is supported by both Level 1 Strategic Flood Risk Assessment [04.02.01] and where necessary, Level 2 Strategic Flood Risk Assessment [04.02.18]. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support the development of PfE and further details relevant to allocations can be found within topic papers [10.01 to 10.10].	Save Greater Manchester Green Belt Stephen Cluer
	Other		
JP-S5.34	Water UK have issued a ten point plan for “21st century rivers, from recovery to renewal” and this policy does not match these ten points	<p>PfE Policy JP-S 5 is considered to be consistent with NPPF Section 14 paragraphs 159 to 169 and provides an appropriate strategy to manage flood by setting out the integrated catchment based approach to protect the quantity and quality of water bodies and managing flood risk at a strategic level.</p> <p>It is considered that an appropriate and proportionate evidence base has been prepared to support the policy, including the Greater Manchester Strategic Flood Risk Assessment Level 1 [04.02.01], Greater Manchester Strategic Flood Risk Assessment Level 2 [04.02.18], Greater Manchester Flood Risk Management Framework [04.02.17] and Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20]. The Flood Risk Sequential Test and Exception Test Evidence Paper [04.02.20] provides a concise summary of the evidence base to support the development of PfE and site allocations. Therefore no change is considered necessary.</p>	Katherine Grant

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S5.35	Concern that the current drainage network is already over capacity and that infrastructure providers should be consulted on site allocations.	<p>No change is considered necessary. It is considered that an appropriate and proportionate evidence base has been prepared for the policy. PfE paragraph 12.4 states that ‘we will work in a collaborative way with infrastructure providers, national government, regulators and others involved in infrastructure planning and funding, to ensure the effective development and implementation of the infrastructure needed to support the delivery of the vision and objectives set out in this Framework’.</p> <p>PfE Policy JP-D 1 point 7 also states that ‘Ensure that development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility infrastructure capacity, from first occupation until development completion’ for example ‘Where potential capacity problems are identified and no improvements are programmed by the relevant infrastructure provider, we will require the developer to contribute to and/or facilitate necessary improvements’.</p> <p>Infrastructure and utility providers have been given the opportunity to respond to the 2021 Publication Stage PfE and its associated evidence base in addition to previous iterations of the plan.</p>	Paul Roebuck Andrew Scanlon
JP-S5.36	The carbon, flood risk and resilience policies need to be worded more carefully so that the achievement of certain environmental objectives is compatible with others objectives such as the conservation and enhancement of the historic environment	No change is considered necessary as policy JP-S 5 is a strategic policy, consistent with the NPPF. The protection and enhancement of the historic environment and its assets is enshrined throughout PfE and more specifically Section 8 Places for People Policy JP-P 2 Heritage and Policy JP-P 3 Cultural Facilities and consistent with paragraph 190 of the NPPF. Evidenced to support the plan is available within the Historic Environment Background Paper 2020 <a href="#">[08.01.12]</a> and individual site allocation historic environment assessments <a href="#">[08.01.01-08.01.11]</a> .	Historic England
JP-S5.37	It is clear that flooding not only damages property, it impacts the mental and physical health of both human and wildlife populations.	No change is considered necessary. The Plan, in line with NPPF paragraphs 119 and 121, seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield	Friends of Carrington Moss

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>land at the core of the conurbation and limit the extent of Green Belt release. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>.</p> <p>PfE is also considered to be in line with paragraph 92(c) of the NPPF which requires that planning policies should enable and support healthy lifestyles, especially where this would address identified local health and well-being needs. Policy JP-P 6 seeks to tackle health inequality within new developments by, for example, including the use of active design principles and Health Impact Assessments.</p>	
JP-S5.38	No plans to mitigate flood risk on Green Belt sites that flood every year.	<p>No change is considered necessary. PfE sets out strategic planning policies for the overall development strategy of the nine districts and should be read as a whole.</p> <p>PfE Policy JP-S 5 is considered to provide an appropriate strategic framework to manage flood risk. The Level 1 Strategic Flood Risk Assessment <a href="#">[04.02.01]</a> published as part of the evidence base to support the Plan includes both an assessment of flood risk across Greater Manchester and identifies strategic mitigation measures for management flood risk.</p> <p>The Plan also accords with NPPF paragraph 174 which requires planning policies to contribute to and enhance the natural and local environment and that development should, wherever possible, help to improve local environmental conditions such as water quality, take into account relevant information such as river basin management plans. The summary of the evidence base to support strategic Policy JP-G 3 River Valleys and Waterways is set out in the Natural Environment Topic Paper <a href="#">[07.01.26]</a>.</p>	
JP-S5.39	Concern over impact from development and the loss of green fields and the Green Belt on flooding, air quality and climate change.	No change is necessary. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (PfE paragraphs 1.41 to 1.46). However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on high grade agricultural	<p>Paul Roebuck</p> <p>Janet Millett</p> <p>Andrew Mair</p> <p>Kim Scragg</p> <p>Janet Taylor</p>

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>land is necessary as it is critical to the delivery of wider development proposals (PfE paragraph 8.53). The release of greenfield and Green Belt land has, however been kept to a minimum. The site selection process [03.04.01] included an assessment of constraints including flood risk (paragraph 6.44) and allocations have been informed by both Level 1 and Level 2 Strategic Flood Risk Assessment [04.02.18]. Further details of which can be found in the relevant allocation topic papers [10.01 to 10.10].</p> <p>PfE Chapter 5 contains strategic policies consistent with the NPPF in relation to climate change and are supported by a proportionate evidence base: further details can be found in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01]. The effects of climate change is a key issue against which the plan is assessed within the Integrated Assessment; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] (Section 5.14, page 208), Integrated Assessment GMSF Main Report 2020 [02.01.02] page 2 and Integrated Assessment GMSF Addendum [02.01.05] pages 3 and 4.</p> <p>PfE JP-S6 Clean Air is also a strategic planning policy which is considered to be consistent with the NPPF and supports the ambition to reduce air pollution. Paragraph 5.44-48 of PfE sets out that GM has signed up to achieve World Health Organization (WHO) 'BreatheLife City' status by 2030, which means achieving WHO targets for particulate matter and other pollutants by this date. The plan should be read as a whole, JP-S6 and other policies relating to sustainable transport (Chapter 10) and policy JP-G2 relating to green infrastructure provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF.</p>	<p>Carol Lee Ann Nutt Laura Charlotte Alison Doherty John Dawson Janet Brooks Chris Green Christopher Russell Woodford Neighbourhood Forum Greater Manchester Housing Providers Peter Stanyer Trevor Thomas Caroline Grimshaw Ryan Beardwood Save GM Green Belt Martin Rigby Mark Brodigan Jennifer Simm Stephen Cluer Marie Holder Steven Higginbottom Gillian Boyle</p>
JP-S5.40	The policy is considered to be vital, especially in light of climate change but there is concern that any policy will not be enforced.	Support welcomed. The monitoring framework in Chapter 12 is considered to provide an appropriate level of detail for a strategic plan.	Laura Ettrick Andrew Scanlon

	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		More detailed monitoring will be incorporated as appropriate within district local plans.	

## PfE 2021 Policy JP-S6 Clean Air

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Para 5.39	Air pollution effect on public health		
JP-S6.1	Concern over existing poor levels of air quality in parts of GM are higher than government objectives and there are problems with asthma and breathing related ailments in areas of poor air quality. Increase pollution will impact on residents/walkers/ cyclists.	JP-S6 is a strategic planning policy. Consistent with the NPPF it sets out an appropriate policy framework for Clean Air and supports the ambition to reduce air pollution. Paragraph 5.44-48 of PfE sets out that Greater Manchester has signed up to achieve World Health Organisation (WHO) 'BreatheLife City' status by 2030, which means achieving WHO targets for Particulate Matter and other pollutants by this date. The policy will be used to guide all development across the plan area, as appropriate. This is evidenced in the Greater Manchester Transport Strategy 2040 [09.01.01] pages 32-36 and Transport Delivery Plan 2021-26 [09.01.02] paragraph 19, page 9; and Right Mix Technical Note [09.01.03] and the Air Quality Habitat Regulations Assessment Study [02.02.02]. The Plan needs to be read as a whole, therefore no change is considered necessary.	Action Against Rural Development Anthony Dann Janet Alldred Save GM's Green Belt David McLaughlin C Smith John Dawson Christopher Russell Woodford Neighborhood Forum Simister Village Community Philip Smith-Lawrence Action Against Rural Development Friends of Carrington Moss
Para 5.41	Impact on Environment		
JP-S6.2	An increase in traffic due to proposed development in PfE will damage the environment.	No change considered necessary. As set out in paragraph 5.49 of the PfE, whilst a wide range of actions will be required to improve air quality, the primary focus is on transport given its primary contribution to air pollution. Regard should be had to transport policies elsewhere in the plan. Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in Greater Manchester and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the Greater Manchester Transport Strategy 2040 [09.01.01] pages 32-36, Transport Delivery Plan 2021-26 [09.01.02]	Louise Lyne Woodford Neighborhood Forum Friends of Carrington Moss Save GM's Green Belt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>(paragraph 19, page 9; which focus on tackling climate change and clean air commitments) and the Right Mix Technical Note [09.01.03] which sets out a pathway towards a reduction in car use, alongside the proposed development in the PfE.</p> <p>The Integrated Assessment [02.01.04] specifically considers air quality as an issue.</p> <p>A PfE Habitats Regulations Assessment- Air Quality [02.02.02] considers the cumulative impacts of development on nationally designated nature conservation sites and appropriate mitigation measures (Paragraph 5.51 of PfE). Therefore, the Plan as a whole is considered to provide an appropriate policy framework to deal with this matter and is consistent with the NPPF.</p>	
JP-S 6.3	Loss of Green Belt, greenspaces, trees and hedgerows will not help air quality; greenspace absorbs pollution.	No change considered necessary as the plan should be read as a whole and this policy alongside Policy JP-G2, which aims to protect and enhance green infrastructure as part of the Nature Recovery Network for GM are consistent with the NPPF and provide an appropriate strategy to deal with this matter. Policy JP-G7 also aims to significantly increase tree cover through a range of measures. Paragraph 5.51 of PfE sets out that the cumulative impacts of development on nationally designated nature conservation sites have been considered within the Habitats Regulations Assessments- Air Quality [02.02.02].	Colin Walters Janet Taylor Mark Brodigan Katherine Grant Peter Christie Save GM's Green Belt
Para 5.45			
JP-S 6.4	Concern over the loss of agricultural land, this will lead to an increase in ill health, lung disease and death. Cannot improve air quality in line with Policy if remove fresh air producing green belt/ farm land.	See response in JP-S 6.2 and 6.3	Action Against Rural Development
Para 5.46			

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 6.5	Concern that the AQMA is difficult to achieve with Highways England having control over motorway network; which impacts on the planning of improvements, air quality and noise pollution.	The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in Greater Manchester and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the Greater Manchester Transport Strategy 2040 <a href="#">[09.01.01]</a> and the Greater Manchester Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> . We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the Strategic Road Network to help address National Highways remaining concerns.	Mr Martin Arthur
Para 5.47/8			
JP-S 6.6	Support for measures/ strategy to improve air quality	Support welcomed.	Woodford Neighbourhood Forum Friends of the Earth Royal London Asset Management Peel L&P Investments (N) Ltd
JP-S 6.7	PfE does not comply with the aims of the Climate Change Act, the Clean Air Act or the Planning and Compulsory Purchase Act 2004 (Section 19, paragraph 1a). It conflicts with Greater Manchester Authorities’ and the Mayor of Greater Manchester’s commitment to becoming carbon neutral by 2038 and with GM’s Clean Air Plan.	No change considered necessary, as PfE Sustainable and Resilient Places Chapter 5 contains strategic policies consistent with the NPPF in relation to climate The policies are supported by a proportionate evidence base: further details can be found in Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> , Carbon and Energy Implementation Plan <a href="#">[04.01.01]</a> . Air Quality is a key issue against which the plan is assessed within the Integrated Assessment; Integrated Assessment of GMSF Scoping Report 2021 <a href="#">[02.01.01]</a> (Page 206), Integrated Assessment GMSF Main Report 2020 <a href="#">[02.01.02]</a> (pages 15, 29, 30) and Integrated Assessment GMSF Main Report Addendum 2021 <a href="#">[02.01.05]</a> (page 12). Therefore, the Plan	Climate Action Bury

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		as a whole, is considered to provide an appropriate policy framework to deal with this matter.	
Para 5.50	Employment Sites		
JP-S6.8	Paragraph 5.50 accepts that few major employment sites can be served by rail and water, which seems inconsistent with national policy to reduce carbon emissions, as it would place a high reliance on development of alternative zero emission fuels for HGVs.	No change considered necessary. As paragraph 5.50 explains, there are only a limited number of existing employment sites available within GM; these are not necessarily located adjacent to rail or water. The PfE supports the location of new employment sites close to public transport to encourage active travel; whilst the emphasis on the use of low emission goods vehicles will help tackle the issue of air pollution and therefore meet the requirements of Policy JP-S 6. Paragraph 5.51 of PfE sets out that the cumulative impacts of development on nationally designated nature conservation sites have been considered within the Habitats Regulations Assessments- Air Quality ( <a href="#">02.02.02</a> ).	Martin Arthur
Para 5.51	Clean Air Measures		
JP-S 6.9	Supports the measures identified in Policy JP-S 6 in regard to air quality, particularly the intention to encourage the use of renewable energy, promotion of development close to public transport, and the promotion of sustainable travel to help reduce carbon emissions and thus improve air quality	Support noted.	Royal London Asset Management Martin Arthur Peter Thompson
JP-S 6.10	Its other aims of clean air, good quality and insulated buildings, green infrastructure enhancement and more travel by public transport, walking and cycling are all to be supported and encouraged;	Support noted.	Peter Thompson
Part 11	Locating Development to encourage sustainable travel		
JP-S 6.11	Proposed development in PfE of new homes, employment uses and infrastructure to support them will increase cars and traffic in GM and will impact on air quality/ increase pollution. This is at odds with the policy	See response to JP-S 6.2 and 6.3.	See Appendix
JP-S 6.12	Speed up introduction of Zero emissions transport	See response in row JP-S6.2	David Hawes
Part 2			
JP-S 6.13	Part 2 of the policy proposes to attach development plan status to non-statutory guidance documents. This is not appropriate	Policy JP-S6 is a strategic planning policy. Consistent with the NPPF it sets out an appropriate policy framework for Clean Air and supports the ambition to reduce air pollution. No change considered necessary.	Emery Planning Highgrove Strategic Land Ltd Rowland Homes Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 6.14	Provide additional evidence to support decision-making, particularly in relation to the Allocations, such as the comparative values of the existing natural capital/rural economy compared with the proposed developments, data about (for example) carbon emissions and the impact of air pollution that will accrue from the Allocations set out in the documentation	It is considered that a proportionate evidence base has been provided to support the policy, it can be found in Carbon and Energy Topic Paper [ <a href="#">04.01.05</a> ], GMCA and TfGM GM Low Emissions Strategy <a href="#">Here</a> . Page 9 and the HRA Air Quality [ <a href="#">02.02.02</a> ] which assesses the potential impacts of the PfE allocations on internationally designated sites within 10km of GMCA area and any necessary mitigation required due to potential impacts from air pollution. In addition, the relevant allocation policies are supported by a proportionate evidence base. Further details of which can be found in the relevant Allocation topic papers.	Friends of Carrington Moss Friends of the Earth Collette Gammond Emery Planning Save Greater Manchester's Green Belt Group Action Against Rural Development Woodford Neighbourhood Forum
Part 3	Development requirements		
JP-S 6.15	Air quality monitoring should be limited to where mitigation is required due to an adverse impact.	No change considered necessary, part 3 requires developments with potentially adverse impact on air quality to submit data on air quality and make appropriate provision for monitoring.	Emery Planning
JP-S 6.16	Clean Air policy should be strengthened to call for major developments to be air quality neutral, mitigation measures are weak and will not be effective.	No change considered necessary. The plan should be read as a whole and this and other policies relating to sustainable transport (Chapter 10) and policy JP-G2 relating to green infrastructure provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF. Carbon and Energy Topic Paper [ <a href="#">04.01.05</a> ], TfGM GM Low Emissions Strategy <a href="#">Here</a> . Page 9 and the Air Quality Habitat Regulations Assessment Study [ <a href="#">02.02.02</a> ].	Friends of the Earth
Part 4	Regulating some developments		
JP-S 6.17	Welcome the clean air policy, however the policy is too onerous on some businesses and facilities; such as waste water treatment works and farmers, who rely on HGVs/ farm vehicles. Mitigation measures should	No change considered necessary. A Strategic Viability Assessment (see Strategic Viability Assessment Technical Appendices 2020 ( <a href="#">03.03.03</a> page 5) has been published alongside the PfE Plan. Therefore, in line	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	not act as a barrier to agricultural developments.	with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	The National Farmers Union
JP-S6.18	Concern over the noise, smell and air pollution associated with Manchester Airport and its potential expansion; such allocations are not consistent with this policy.	Part 4 of this policy sets out the requirement to regulate pollution from developments that generate significant pollution. The plan should be read as a whole and this and other policies relating to sustainable transport (Chapter 10) and JP-S2 Carbon and Energy provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF.	Woodford Neighbourhood Forum Climate Action Bury Friends of the Earth
Part 5	Electric Charging Points		
JP-S 6.19	Concern regarding clean air zone charges, the affordability of electric vehicles and viability of the policy.	No change is considered necessary. Policy JP-S 2 Carbon and Energy takes a stepped approach to the reduction in carbon emissions to allow technology and developers time to adapt to policies and for the decarbonisation of energy; developments should be future-proofed through the provision of Electric Vehicle charging points in readiness for this, evidence in Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> pages 31-33.	Stephen Woolley Paul Roebuck Trevor Widdop Sheila Tod Peel L&P Investments (N) Ltd Ryan Beardwood The National Farmers Union
JP-S 6.20	Electric charging points are counterproductive to improvements in public transport	No change considered necessary. The expansion of infrastructure to support more sustainable transport is an important part of the integrated approach to climate change to help meet the aim of a carbon neutral Greater Manchester no later than 2038. Evidence is set out in Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> page 32.	Paul Roebuck
JP-S6.21	Clarity required on requirements at strategic level and local level in relation to EV Charging Points and other requirements for new development to ensure this is an effective policy.	This policy is a strategic level policy and it is not considered necessary or appropriate to determine the scope of local plans in PfE Plan. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighborhoods or types of development'.	Peel L&P Investments Ltd Martin Arthur Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			PD Northern Steels PD Northern Trust Asset Management Boys & Girls Club of GM
Part 6			
JP-S6.22	Concern/ objection to Clean Air Zone. Plan should define the boundary of the Clean Air Zone on a proposals plan.	Policy JP-S6 is strategic policy. The plan should be read as a whole and this and other policies relating to sustainable transport (Chapter 10) and JP-S2 Carbon and Energy provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF. The <a href="#">GM Mapping AQMA</a> shows the location of the AQMA. No changes are therefore necessary.	Ryan Beardwood Highgrove Strategic Land Ltd
Part 8	Street Design		
JP-S6.23	Support for tree planting, but concern about how this will be implemented.	PfE sets a strategic policy framework and the detail for how the measures will be implemented will be undertaken through the development of the Nature Recovery Network for GM, see Policy JP-G2 for more detail and as individual applications come forward for planning permission they will be required to meet policy requirements of PfE. Policy JP-G7 also aims to significantly increase tree cover through a range of measures.	Paul Roebuck Janet Taylor
Part 9	Traffic control in and around schools		
JP-S6.24	Concern regarding traffic levels, pollution and safety around schools resulting from development.	See response in row JP-S6.2 of this table.	Friends of the Earth
Part 10	Promoting Actions to reduce air pollution		
JP-S6.25	Actions that promote removal of pollutants/CO2 should include ideas such as mass tree planting and the protection and enhancement of the Strategic Green Infrastructure network would be relevant here also.	No modification necessary as this policy and a number of other policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, G7 and G8 which states that new development must be supported by the necessary green infrastructure, including where appropriate green spaces, trees and woodland. The Plan needs to be read as a whole, therefore no change is considered necessary.	Friends of the Earth City of Trees Friends of Carrington Moss Greater Manchester Housing Providers
JP-S6.26	Opportunities to encourage active travel will impact on air quality	See response to row JP-S6.2.	Gillian Boyle Stephen Cluer
Point 11	Development located in sustainable locations		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S6.27	Concern about development in suburban / not sustainable locations and on Green Belt will lead to an increase traffic and congestion/ commuter pollution.	See response to row JP-S6.2.	Peel L&P Investments (N) Ltd Linus Mortlock Trevor Thomas Martin Rigby Carol Lee Jamie Bentham Maureen Buttle Peel L&P Investments (N) Ltd Save Greater Manchester's Green Belt
JP-S6.28	Point 11 is a duplication of point 1. Ultimately, such objectives will need to be quantified, costed and re-tested as part of any viability appraisal particularly if such details are to be provided through Local Plan policies.	This modification is not considered necessary. A strategic viability assessment (see Strategic Viability Assessment Technical Appendices 2020 <a href="#">[03.03.03]</a> page 5) has been published alongside the PfE Plan.	Highgrove Strategic Land Ltd Rowland Homes Ltd EON Plant Ltd PD Northern Steels PD Northern Trust Asset Management Boys & Girls Club of GM
JP-S6.29	Public transport improvements appear to be a long term aspiration - there is no reference to the potential for other options, such as community transport and electric buses, to play a transitional role in creating the demand for bus services.	See response in row JP-S 6.2 and transport policies of the PfE Plan contained in Chapter 10 which encourage sustainable transport. No change is considered necessary.	Friends of Carrington Moss Simon Robertson
JP-S6.30	Believe the restoration of our peat mosses will provide a strong nature-based solution to significantly support air quality improvements, particularly the removal of pollutants from the air.	No change considered necessary. The plan should be read as a whole and this and other policies relating to nature based solutions to carbon sequestration (JP-S2) and retention of green infrastructure (JP_G2) provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF. Further evidence relating to Carbon Offsetting, paragraphs 3.46-48 pages 52-55 of Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> .	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)

## PfE 2021 Policy JP-S7 Resource Efficiency

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Part 1			
JP-S 7.1	Welcome the development of GM Resource Strategy; however status will the Resource Strategy have?	The status of the GM Resource Strategy will be determined at a later date through appropriate decision making processes. No change is therefore considered necessary.	EON Plant Ltd Rowland Homes Ltd Highgrove Strategic Land Ltd
JP-S 7.2	The aims of this plan undermine this policy; particularly use of the Green Belt. Look to use under-used undeveloped land instead; such as retail car parks and offices.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a> . Therefore no change is considered necessary.	Colin Williams Gillian Boyle Martin Rigby Carol Lee Stephen Cluer
Part 2			
JP-S 7.3	Support for policy however, the requirement for new developments to “incorporate storage space” and facilities for the “processing of waste” need further clarity. How will this be measured? This needs further justification considering the LPAs role to provide waste storage facilities.	Support is noted and clarity is provided in paragraphs 5.53-5.56; waste planning will continue to be undertaken through <a href="#">GM Joint Waste Strategy 2012</a> and GM Zero Waste Strategy. Therefore no change is considered as necessary.	Peel L & P Investments (N) Ltd EON Plant Ltd Rowland Homes Ltd Highgrove Strategic Land Ltd PD Northern Trust Management

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-S 7.4	Objection to requirement to have facilities to process waste on site; a balanced approach should be taken design, viability alongside deliverability	No change is considered necessary. A Strategic Viability Assessment (see Strategic Viability Assessment Technical Appendices 2020 <a href="#">[03.03.03]</a> page 5) has been published alongside the PfE Plan. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	Redrow Homes (Trafford)
Part 3			
JP-S 7.5	Will waste infrastructure requirements be identified in Local Plans or Waste Resource Strategy?	<a href="#">GM Joint Waste Strategy 2012</a> contains policies to guide waste management requirements and potential new locations for potential waste management facilities. Annual monitoring of waste facility capacity will inform whether and when an update of the joint waste plan is required, including a result of the growth in development set out in the plan, see PfE paragraph 5.56.	EON Plant Ltd Rowland Homes Ltd Highgrove Strategic Land Ltd
Part 4			
JP-S 7.6	Will this be through Local Plans or planning applications and how will it be measured?	Policy JP-S7 is a strategic policy and part 4 is considered to be robust and provides the necessary detail in relation to sustainable design and construction and should be read alongside policy JP-S2 on Carbon and Energy with evidence set out in the Carbon and Energy Topic Paper <a href="#">[04.01.05]</a> and JP-P1 Sustainable Places.  In terms of how it will be measured; the monitoring framework for the plan is set out in Chapter 12 and is considered to provide an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.  The plan should be read as a whole so no changes are considered necessary.	EON Plant Ltd Rowland Homes Ltd Highgrove Strategic Land Ltd PD Northern Trust Management
JP-S 7.7	Lack of evidence in relation to Minerals and Waste. GM Minerals Plan is out of date and it is clear from local aggregate assessment that there are insufficient resources available.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will	Peter Nicholas Horsley Catherine Morgetroyd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		remain unchanged and will continue to be applicable once PfE is adopted. Paragraph 5.52 of PfE states that annual monitoring of mineral extraction and changes in likely future needs will inform whether and when an update of the joint minerals plan is required, including as a result of the growth in development set out in this plan. Therefore no change is necessary.	
JP-S 7.8	Concern that new development will result in greater need for waste disposal; lead to more inefficient use of resources.	See response in row JP-S7.5	David McLaughlin Maureen Buttle Jennifer Simm Linus Mortlock Paul Roebuck
JP-S7.9	Support for full recycling in a consistent way across GM, including circular economy and zero-waste economy. Discussions across strategic allocations to explore opportunities for this should be explored.	Support for this part of the policy noted. GM Zero Waste Strategy will set out how we will move towards a circular and zero-waste economy (paragraph 5.54 of PfE). No change is considered necessary.	Woodford Neighbourhood Forum Katherine Grant Roy Chapman Simon Robertson NGDV
JP-S7.10	The KPIs need to be updated to ensure they measure all aspects of this Policy.	The monitoring framework in Chapter 12 is considered to provide an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. Therefore no change is considered necessary.	Friends of Carrington Moss

## Appendix

### Respondents to PfE 2021 Policy JP-S1 – Sustainable Development

Table 1. Row JP-S1.1

Given Name	Family Name	On behalf of company/organisation or individual
Greater Manchester Housing Providers		Greater Manchester Housing Providers
		The Coal Authority
		Gladman Developments
Redrow Homes (Lancashire)		Redrow Homes (Lancashire)
		Friends of the Earth
Royal London Asset Management		Royal London Asset Management
		Peel L&P Investments (N) Ltd
Murphy Group		Murphy Group
Redrow Homes (Trafford)		Redrow Homes (Trafford)
		Miller Homes
Prospect GB and Dobinetts Regen		Prospect GB and Dobinetts Regen
Seddon Homes Ltd		Seddon Homes Ltd
HBF		Home Builder's Federation
PD Northern Trust Asset Mgt		PD Northern Trust Asset Mgt
Russell LDP		Russell LDP
Taylor Wimpey		Taylor Wimpey
SGMGB		Save Greater Manchester's Green Belt

**Table 2. Row JP-S1.10**

Given Name	Family Name	On behalf of company/organisation or individual
Royal London Asset Management		Royal London Asset Management
Murphy Group		Murphy Group
Rowland Homes Ltd		Rowland Homes Ltd
Redrow Homes (Trafford)		Redrow Homes (Trafford)
GLP Trows LLP / BDW Trading Ltd		GLP Trows LLP / BDW Trading Ltd
		HIMOR Group
PD Northern Trust Asset Mgt		PD Northern Trust Asset Mgt
		Bellway Homes Ltd
		Miller Homes
EON Plant Ltd		EON Plant Ltd
Seddon Homes Ltd		Seddon Homes Ltd
Kim	Scragg	NA
Janet	Taylor	NA
Martin	Rigby	NA
Jennifer	Simm	NA
Elizabeth	Hogan	NA
Chris	Waterfield	NA
Jacqueline	Charnock	NA

Given Name	Family Name	On behalf of company/organisation or individual
Woodford Neighbourhood Forum		Woodford Neighbourhood Forum
Warburton Parish Council		Warburton Parish Council
		Gladman Developments
		Peel L&P Investments (N) Ltd
Hollins Strategic Land		Hollins Strategic Land
Boys and Girls Clubs of GM		Boys and Girls Clubs of GM
Home Builder's Federation		Home Builder's Federation
Taylor Wimpey		Taylor Wimpey
Church Commissioners of England		Church Commissioners of England

**Table 3. Row JP-S1.14**

Given Name	Family Name	On behalf of company/organisation or individual
Mr J	Downs	NA
		Quantum Star Ltd
Mr I	Corbett	NA
Mrs	Hind	NA
Mr BH	Tomlinson	NA
		The Trustees of SummerShades Trust
Mrs K	Welton	NA

Given Name	Family Name	On behalf of company/organisation or individual
Mr and Mrs	Hegab	NA
Mr K	Henthorn	NA
Mr and Mrs A	Lord	NA
Mr S	Ingram	NA
Ms K	McAvoy	NA
Mr D	Winterbottom	NA
Mr W	Clarke	NA
Mr Z	Iqbal	NA
Ms D	Vick	NA
		The Connell Group
		Tanner Bros Ltd
Mr E	Connell	NA
Gillian	Boyle	NA

**Table 4. Row JP-S1.15**

Given Name	Family Name	On behalf of company/organisation or individual
		Bowden Rugby Club
Miri	Roshni	NA
Mr J	Gibney	NA
WR	Halman	NA
CL	Halman	NA
FI	Carless	NA
		Bluemantle
		Gladman Developments
		Royal London Asset Management
		Redrow Homes (Trafford)
		Miller Homes
		Seddon Homes Ltd

Given Name	Family Name	On behalf of company/organisation or individual
Murphy Group		Murphy Group
		Highgrove Strategic Land Ltd
		Bellway Homes Ltd
EON Plant Ltd		EON Plant Ltd
CCW&G		CCW&G
		HIMOR Group
		Hollins Strategic Land
		Home Builder's Federation

## Respondents to PfE 2021 Policy JP-S2 – Carbon and Energy

**Table 5. Row JP-S2.5**

Given Name	Family Name	On behalf of company/organisation or individual
Janet	Millett	NA
Colin	Walters	NA
Trevor	Widdop	NA
Frances	Davidson	NA
Andrew	Mair	NA
Gillian	Boyle	NA
Janine	Lawford	NA
Mark	Brodigan	NA
Alan	Heald	NA
John	Dawson	NA
Christopher	Russell	NA
Marie	Holder	NA
Roy	Chapman	NA
Steven	Higginbottom	NA
Susan	Sollazzi	NA
Pete	Abel	Friends of the Earth

**Table 6. Row JP-S2.19**

Given Name	Family Name	On behalf of company/organisation or individual
Sheila Fisher	Fisher	NA
Deborah Foulkes	Foulkes	NA
E	Bowles	NA
		Natural England
Barbara	Keeley	NA

Given Name	Family Name	On behalf of company/organisation or individual
Edward	Beckmann	NA
David	McLaughlin	NA
		Warburton Parish Council
		AARD - Action Against Rural Devt
Mr Mark H	Burton	NA
WR	Halman	NA
Susan	Sollazzi	NA
Pete	Abel	Friends of the Earth
		CPRE
		Friends of Carrington Moss
		The Wildlife Trusts

**Table 7. Row JP-S2.28**

Given Name	Family Name	On behalf of company/organisation or individual
		Emery Planning
		Bowden Rugby Club
Miri Roshni		NA
W R Halman		NA
C L Halman		NA
F I Carless		NA
J M Gibney		NA
		Highgrove Strategic Land Ltd
		Bluemantle
		Peel L &P Investments (N)Ltd
		Redrow Homes (Trafford)
		Rowland Homes Ltd
		EON Plant Ltd

Given Name	Family Name	On behalf of company/organisation or individual
		Emery Planning
Peter	Thompson	NA
		PD Northern Steels
		Seddon Homes Ltd
		Boys and Girls Club of GM
		CCW&G
		J & B Fitton
		GLP Trows LLP and BDW Trading Ltd
		PD Northern Trust Asset Mgt
		GLP Ltd
		Russell LDP

## Respondents to PfE 2021 Policy JP-S6 Clean Air

Table 8. Row JP-S6.11

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Stratton	NA
Samantha	Dugmore	NA
Caroline	Grimshaw	NA
Colin	Williams	NA
Edward	Beckmann	NA
Janine	Lawford	NA
Jamie	Bentham	NA
David	McLaughlin	NA
Maureen	Buttle	NA
Jennifer	Simm	NA
Alison	Doherty	NA
Andrew	Richardson	NA
Chris	Waterfield	NA
Chris	Green	NA
Susan	Southward	NA
Christopher	Russell	NA
Raymond	Chamberlain	NA
Marie	Holder	NA
Mrs June	Clough	NA
		AARD - Action Against Rural Development
Collette	Gammond	NA
Sheila	Fisher	NA
Linus	Mortlock	NA
Frances	Davidson	NA
Andrew	Mair	NA
Peter	Christie	NA

Given Name	Family Name	On behalf of company/organisation or individual
Margaret	Fulham	NA
Neil	Campbell	NA
E	Bowles	NA
Kim	Scragg	NA
		Save Greater Manchester's Green Belt
Alan	Bayfield	NA
Martin	Rigby	NA
Edward	Beckmann	NA
Carol	Lee	NA
Sheila	Tod	NA
Sheila	Fisher	NA
Linus	Mortlock	NA
Andrew	Richardson	NA
Janet	Brooks	NA
C	Smith	NA
Mark	Brodigan	NA
Alan	Heald	NA
		Woodford Neighbourhood Forum
		Simister Village Community
		Warburton Parish Council