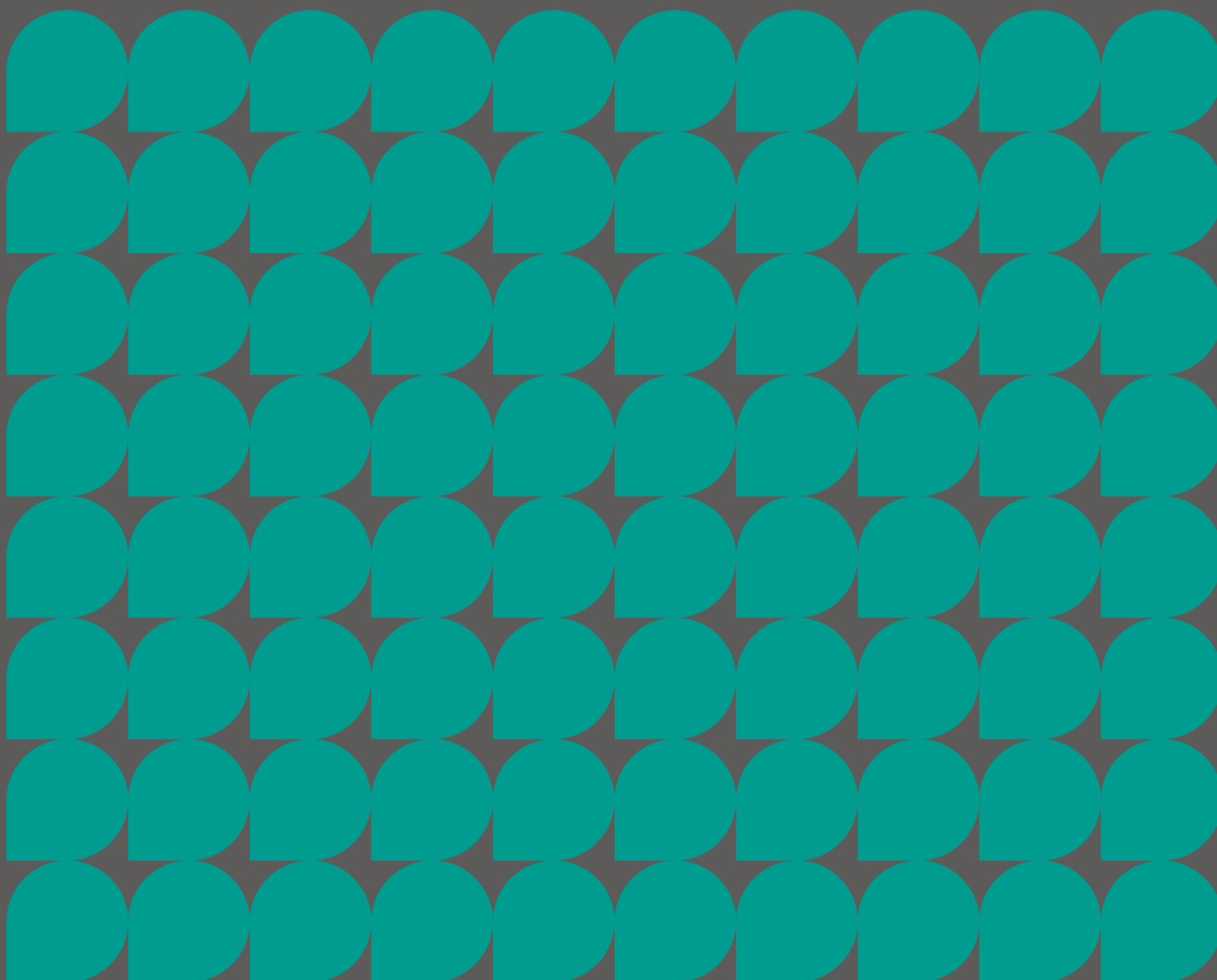


Places for Everyone

Places for Jobs Issues Summary

February 2022



Chapter 6 – Places for Jobs

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 6 – Places for Jobs and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JP-J1 - Supporting Long-Term Economic Growth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General/ Plan-wide		
JP-J1.1	Plan is relying on 2013 Joint Minerals Plan which precedes the current NPPF. Review of Joint Minerals Plan must run hand in hand with GMSF as objectives will be undeliverable. Mineral supply cannot be assumed. GMSF must explain clearly how it proposes to integrate minerals plan policies 1-5, 8-9 and 11. Not all policies have considered Mineral Safeguarding Areas. Representation to 2016 GMSF attached, which states there is no section on minerals and the plan needs to consider Minerals Plan Policies 1-5, 8-9 and 11. Demands for minerals will not necessarily be met. Plans should show MSAs and minerals infrastructure.	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.	Mineral Products Association
JP-J1.2	The Publication Plan has not had due regard to the provisions of the latest draft of the NPPF, and specifically Section 13, Paragraph 141 and the strategy to be assessed in relation to justifying that exceptional circumstances exist to change Green Belt boundaries	It is considered that the Publication Plan is in line with NPPF. In relation to para 141, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . No change is considered necessary.	See Appendix
JP-J1.3	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before “Places for Everyone” can proceed any further. It is assumed that a transition between a spatial	As stated at paragraph 1.22 of the Places for Everyone Plan, the impact of the five different changes between the GMSF2020 and the PfE2021, together with that of their cumulative impact was considered and it was	See Appendix

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	framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write.	determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations. No change is considered necessary.	
JP-J1.4	Sections 20 to 23 relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Plan Review process. It is assumed that the Greater Manchester Combined Authority has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of this plan. The documentation is inconsistent, incoherent in parts and does not currently justify and support the Plan as drafted.	No change considered necessary. Comment not relevant to JP-J1, however the Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 . and is supported by a proportionate evidence base [see supporting documents page]. Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan .	See Appendix
JP-J1.5	Disagree with the Places for Everyone-IA that JP-J 1 will have the following effects on IA Objective 16: Uncertain/positive (? /+) on assessment criteria Improve landscape quality and the character of open spaces and the public realm Negative/Uncertain (-/?) on assessment criteria Conserve and enhance the historic environment, heritage assets and their setting Negative/Uncertain (-/?) on assessment criteria Respect, maintain and strengthen local character and distinctiveness In view of our comments on the Plan, we consider that as drafted the policy and the Chapter as a whole would be very incompatible (--) with IA Objective 16.	No change considered necessary. The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01].	Historic England
JP-J1.6	Local labour during development/ construction leads to job losses when developed and companies move on	The Greater Manchester Strategy and Local Industrial Strategy sets out ambitions to deliver good quality, high- skilled jobs. PfE seeks to provide land to meet the widest range of employment opportunities to ensure Greater Manchester remains as competitive as possible and provides sites for advanced manufacturing, digital and tech jobs, for example, at Heywood/Pilsworth (Northern Gateway). A commitment to local labour is only one of the ways in which the plan will benefit local people. No change considered necessary.	Laura Charlotte

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JP-J1.7	Comments provided in relation to Cheshire East Local Plan examination - Policy EG5 does not indicate the future capacity for additional town centre and retail development in the main towns and service centres, or establish the boundaries of town centres and primary shopping areas.	No change proposed. Comment relates to Cheshire East's Local Plan and does not relate to PfE.	Bellway Homes Ltd
JP-J1.8	Report submitted which recommends some medium to long term interventions aimed at expanding the freight offering, since movement of goods by road is the most difficult to decarbonise and future demand is likely to exceed that available at Trafford Park	Comment / evidence noted.	Rail future Ltd
	Employment need/ demand		
Policy JP-J1.9	<p>The amount of employment floorspace proposed is excessive and unnecessary when compared to the evidence presented, especially in terms of predicted job losses.</p> <p>Over-provision can increase vacancy rates, increase competition for business between neighboring authorities and lead to areas becoming blighted.</p> <p>The approach used to calculate Greater Manchester's employment floorspace needs is inadequate/ incorrect/ questionable. The assumptions used to determine employment land supply requirements overestimates the requirement and doesn't take into consideration market signals, past completion/ take up rates or predicted future impacts on the industry (i.e. increased automation, more working from home and a downward trend in demand for office space). The impacts of the Covid-19 pandemic on employment land supply or needs have not been assessed. It also not clear whether unoccupied floorspace (whether new or previously occupied) has been accounted for.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is not considered that there will be an over provision of employment land as a result of the policies in the plan.</p> <p>It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and the need to have sufficiently attractive sites and premises to meet the overall ambitions of the Greater Manchester Strategy and Local Industry Strategy. See also supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04].</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>As such, when the plan and evidence is read as a whole no change is considered necessary.</p>	See Appendix

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Policy JP- J1.10	<p>There is adequate capacity to meet employment floorspace requirements on previously developed land, there is no need to release Green Belt.</p> <p>No need to release green spaces for offices given there is an over-supply; businesses should take advantage of the transport network and existing land supply.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The land supply data set out in tables 6.1 and 6.2 in the Plan, demonstrates that there is insufficient land in the urban area to meet the identified need. As set out in paragraphs 1.41-1.48 of PfE 2021, some Green Belt release is required to address identified development needs and the exceptional circumstances for this is set out in the Green Belt Topic Paper [07.01.25].</p> <p>99% of land identified for office development is within the urban area. There is one allocation for office development on Green Belt land. The exceptional circumstances for this is set out in the Medipark allocation topic paper [10.01.57].</p> <p>As such, when the plan and evidence is read as a whole no change is considered necessary.</p>	See Appendix
JP- J1.11	<p>Whilst a brownfield-first approach is broadly supported, there is a clear need to allocate more available and deliverable greenfield sites to address historic under delivery and the identified long lead times for delivery of sites constrained by their significant scale, and wider infrastructure requirements.</p>	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p>	Harworth Group Plc

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		<p>It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and the need to have sufficiently attractive sites and premises to meet the overall ambitions of the Greater Manchester Strategy and Local Industry Strategy. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04]. Therefore, no change considered necessary.</p>	
JP- J1.12	<p>The plan should be amended to reduce growth assumptions (supplemented by an assessment of the impact of moving to a steady state economy - indicated by the climate crisis).</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>The Sustainable Development (JP-S 1), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address climate change and sustainable development. As such, when the plan is read as a whole no change is considered necessary.</p>	Mark H Burton
JP- J1.13	<p>The GMSF does not sufficiently identify or analyse evidence of market demand (such as the locational and premises requirements of the sectors forecast to grow) or compare the available stock of land with these future requirements so that gaps and any over-supply can be identified.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>The methodology is also set out within the Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	See Appendix

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JP- J1.14	The PfE does not explicitly identify the type of jobs or scale of economic growth that it is seeking to deliver (in terms of job numbers or GVA). The jobs won't be for local people	The scale of growth which PfE intends to deliver is set out within Chapter 5 'Places for Jobs' of the Plan. Types of jobs are listed in JP-1B. This is informed by evidence set out within the Employment Topic Paper [05.01.04] and the Economic Forecasts for Greater Manchester Paper [05.01.01] . An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.	See Appendix
JP- J1.15	No assessment is set out in the evidence base to gauge the extent to which the availability of suitable and viable employment land has constrained past take up.	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] . An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.	See Appendix
JP- J1.16	PfE does not evidence and justify the following: Selection of a 5-year (31 percent) margin over a 4-year (25 percent) margin on industrial and warehousing land supply; a 660,389 sqm surplus (over the 5-year margin) of industrial and warehousing land over the plan period; the allocation of 478,000 sqm of industrial and warehousing land post-2037.	The Employment Land Needs in Greater Manchester document [05.01.02] , page 9-10] provides rationale for the applied margin. The Employment Topic Paper [05.01.04] , page 18] states that "a margin of flexibility has been added to account for recent evidence of strong demand for Industrial and Warehousing space indicating demand may have been suppressed by a lack of supply; the inherent uncertainties in any forecasting exercise; and the aspiration to increase the overall size and competitiveness of the GM economy. This is set at 31% based on previous studies and external advice provided.". It is considered that a proportionate evidence base has been provided to support policy JP-J 1. Therefore, no change is considered necessary.	Save Royton's Greenbelt Community Group
JP- J1.17	Too many warehousing and not enough manufacturing jobs.	Policy JP-J1 seeks to provide a range of sites to accommodate a wide range of opportunities including both warehousing/logistics as well as advanced manufacturing. No change is considered necessary.	See Appendix
JP- J1.18	Baseline scenario for assessing need does not align with Local Industrial Strategy	The economic strategy in PfE complements that within the Local Industrial Strategy. The strategy maximises the potential of key growth locations across the conurbation. These locations range from core conurbation	See Appendix

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		areas such as the City Centre, the Quays and Trafford Park to new areas that will boost the competitiveness of the north as well help to sustain the competitiveness of the south. No change is considered necessary.	
JP- J1.19	There is insufficient land and employment development coming forward up to 2037 to allow Greater Manchester to compete in a global market, meet aims on levelling up and economic prosperity and address historic restricted delivery. It is important that a wide range of new sites are made available for employment (and housing) development across the Plan area which is accessible to each other. This includes large sites able to accommodate the growth of industries that typically have a large floorplate, such as logistics, which are unlikely to fit or be viable to deliver in the majority of the existing employment hubs listed in the policy. Additional land should also be set aside as safeguarded employment land which will accommodate future development needs. Draft Policy JP-J 1 is clear on the need for additional employment provision, however this is not consistent with the downward trend in both office and warehousing floorspace proposed in the plan (particularly in Wigan).	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. See also supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04].</p> <p>A 31% margin of flexibility has been added when calculating the employment land needs for offices and industry and warehousing, based on previous studies and external advice provided (see Employment Topic Paper [05.01.04], pages 17-18). Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the demand for employment land, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that JP-J2 provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF. Policy JP-G11 has also been included in the plan in relation to safeguarded land. No change is considered necessary.</p>	See Appendix
JP- J1.20	Concern with the reduction of employment land allocations in Wigan (60% from 2016 plan to 2021 plan) which will stunt growth and not achieve economic growth.	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>The economic strategy in PfE complements that within the Local Industrial Strategy. The strategy maximises the potential of key growth locations</p>	LQ Estates and Trafford HT

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		<p>across the conurbation, which collectively meet the strategy. The Site Selection Background Paper [03.04.01] sets out the methodology for selecting the strategic allocations. Based on the evidence it is considered that an appropriate supply of sites has been identified to meet need across the plan area.</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. No change is considered necessary.</p>	
	Commensurate Housing Provision		
JP- J1.21	<p>Employment growth is not supported by sufficient housing provision, in type/ quantity/ location. An under-provision of homes will result in an insufficient local labour supply; leading to unsustainable levels of inward commuting; further pressure on the regions road and public transportation networks and increases in per capita carbon emissions.</p> <p>No analysis has been provided to assess the impact that the proposed housing strategy will have upon the baseline supply of employment land.</p>	<p>The housing need has been calculated using the standard methodology as set out by NPPF - further information on the housing need methodology is provided in the Housing Topic Paper [06.01.03]. PfE identifies a range of new housing sites, in a variety of locations. The varied mix of sites, supported by the necessary infrastructure will provide the right level and mix of homes needed to support the economic growth. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	See Appendix
JP- J1.22	<p>Significant concerns regarding soundness of evidence base behind policy - The Nicol Economics report fails to consider the quality of (presumably existing) employment land and floorspace, the precise location of need, or indeed provide a breakdown of the need assessment by district. There has been no commercial analysis of the city region submarkets to substantiate whether the north / south balance is appropriate in respect of industry and warehousing land.</p>	<p>It is considered that a proportionate evidence base has been provided to support the policy. The Nicol Economics Report [05.01.02] provides an overall assessment of economic needs for employment land and makes the best possible use of available data. The methodology used to calculate employment needs for the plan is set out within the Employment Topic Paper [05.01.04]. No change is considered necessary.</p>	Morland Capital Partners No1 Ltd
	Growth Strategy/ Approach		
JP- J1.23	<p>The assumptions made about the increased participation of the existing resident population are unrealistic; existing residents will not have the necessary qualifications and skills to fill the roles created by the sectors forecast to grow; inward migration will therefore be necessary.</p>	<p>Economic growth and the success of cities are increasingly reliant on the creation and application of knowledge. The Greater Manchester Strategy and Local Industrial Strategy sets out ambitions to deliver good quality, high- skilled jobs. PfE seeks to provide land to meet the widest range of employment opportunities to ensure Greater Manchester remains as competitive as possible and provides sites for advanced manufacturing,</p>	See Appendix

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		<p>digital and tech jobs, for example, at Heywood/Pilsworth (Northern Gateway). Further details on skills is set out within the Employment Forecasts for Greater Manchester Paper [05.01.01].</p> <p>PfE Policy JP-P 5 'Education, Skills and Knowledge' sets out significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester. See pages 182-184 of the Plan for the full policy. Further information on skills and education in relation to supporting economic growth is set out within the Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	
JP- J1.24	<p>There is a particular focus within this Policy on maximising the potential of existing transport infrastructure, including the motorway network. This is supported - to facilitate the creation of sustainable communities, new employment development should be directed towards those locations which are well-related to existing urban areas, reducing the distance travelled between home and the workplace. To this end, the Council's development and spatial strategy should focus on the future development of land which provides new employment opportunities close to people/ homes to reduce the need for significant travel. Whilst it will still require a conscious choice from people to travel by public transport, walking or cycling as an alternative to the private car, the location of employment opportunities relative to their home will ultimately have a role to play in informing that decision.</p>	<p>The majority of housing and employment land identified in the plan is in the urban area (paragraph 1.42) with good access to sustainable modes of transport.</p> <p>The Greater Manchester Transport Strategy 2040 [09.01.01] and Our Five Year Delivery Plan 2021-2026 [09.01.02]. set out how we plan to deliver our longer-term aspirations for an integrated transport network that supports this future growth. It includes, amongst other things, plans for improved orbital public transport links, capacity enhancements to the rail and metrolink networks, clean air measures, transformative investment in walking and cycling, and reform of the bus market and rail franchising.</p> <p>Policy JP-C 1 'An Integrated Network' sets out measures for ensuring a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services; and includes measures to increase cycling and walking infrastructure.</p> <p>PfE identifies a range of new housing and employment sites outside of the urban area. The detailed policies for site allocations and the thematic policies for new development,</p>	Peel Land and Property

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		together, set out the necessary infrastructure requirements and sites will not come forward unless it can be demonstrated this will be provided. No change is considered necessary.	
JP-J1.25	It is important that job creation is evenly balanced across the nine Boroughs, as well as within each individual Borough. This will also help to support smaller businesses, including start-ups, as opposed to focusing solely on larger scale B2 and B8 employment uses (which it is accepted is needed as well). This will no doubt be a matter for the respective Local Plans of each Authority, but which should be encouraged and recognised at a strategic level within the PfEDPD.	The overall spatial strategy of the Plan seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth and prosperity across all boroughs. Criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that employment growth opportunities are well connected and accessible to all residents. PfE is a strategic level Plan - Local Plans will have to be in conformity with PfE and will provide further detail on the strategic policy areas within PfE within a local context, where appropriate. No change is considered necessary.	Peel Land and Property
JP-J1.26	No mention of increasing the competitiveness of eastern Greater Manchester	The North-East Growth Corridor is covered by JP-Strat 6 (page 64-65 of the Publication Plan). The North East Growth Corridor extends eastwards from Junction 18 of the M62, as is shown on Figure 4.2, page 65. Ashton Town Centre is identified as a 'Principal Town Centre' in Figure 3.1 'Key Diagram', page 40, and as a 'Strategic Location – Town Centre' in Figure 6.1 'Strategic Locations' page 113, of the Plan. Paragraph 4.47 of the Plan sets out that in relation to boosting Northern Competitiveness "investment in the town centres of the northern districts will be vital, particularly the town centres of Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale and Wigan". Ashton-under-Lyne is also listed under G(v) of Policy JP-J1, in relation to providing stronger focus for local economic activity. When the plan is read as a whole no change is considered necessary.	Jacqueline Charnock
JP-J1.27	The rural economy has been completely omitted from this policy (and as such is not consistent with NPPF), including the contribution of the rural economy to GM as a key sector. A focused on a rural strategy could help to address significant economic disparities. The document does not acknowledge the extensive skill base of the rural workforce and consider reasonable	JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 7) does	See Appendix

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	alternatives to land use for the rural economy. Therefore, policy is not justified or promote prosperity for all residents of GM.	recognise the role that rural areas play across the PfE area, including in terms of the economy. When the plan is read as a whole no change is considered necessary.	
JP-J1.28	<p>This policy can be strengthened and made sound by including the following commitments: the Plan should be reshaped to put the climate emergency and the health and wellbeing of GM's residents at the heart of all its Policies to ensure sustainable development can be achieved; the provision of additional evidence in the form of a Rural Economic Strategy; the provision of additional evidence in the form of Rural Land Need, existing and projected, together with the associated skill-base, challenges, etc; removal of the proposed office space at Manchester Airport (JP-Strat 10) – Medipark Allocation; update the wording in Policy point D (page 110) to reference the economic opportunities arising from natural solutions; a detailed review of land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt land for employment sites - in advance of the</p> <p>results of that review being available, developers should be pointed to existing sites; the detailed review mentioned above should also consider an assessment of land supply impacts arising from Brexit, the pandemic and the recent changes to the permitted development scheme; remove the incorrect statements at paragraph 8.50 of the Employment Topic Paper; confirmation that this Policy will require brownfield land use to be prioritised; all the Allocations should be updated to ensure they meet the measures set out at paragraph 6.15 (page 109); the KPIs need to be updated to ensure they measure all aspects of this Policy.</p>	<p>The Sustainable Development (JP-S 1), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address climate change and sustainable development.</p> <p>JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts However, the Greener Chapter (chapter 7) does recognise the role that rural areas play across the PfE area, including in terms of the economy.</p> <p>In relation to the proposed office space at Manchester Airport (JP-Strat 10) - Medipark allocation and comments regarding the land supply, it is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. It is appropriate for the overall land supply targets set out in both JP-J 3 and JP-J 4 to be based on the employment land need figures, derived from the evidence base.</p> <p>Employment need and supply is discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04].</p> <p>Supporting evidence document Covid-19 and PfE Growth Options [05.01.03] and the Employment Topic Paper [pages 19-21] considers the impact of the pandemic on employment need/ supply. The impact of Brexit is considered within the Employment Topic Paper [pages 18-19 and 21-22].</p>	The Wildlife Trusts

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		<p>The PfE sets out a very clear preference for using previously developed (brownfield) land and vacant buildings to meet development needs. Other than in relation to the site selection process for identifying the strategic allocation, there is not a sequentially preferable priority. Instead, a preference for using brownfield land ensures that an efficient use can be made of the land supply and to keep the release of greenfield and Green Belt land to a minimum.</p> <p>Given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. See Growth and Spatial Options Paper: 02.01.10 for further information.</p> <p>In relation to the KPIs, 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.</p>	
JP- J1.29	The policy does also look at the main town centres but due to the ordering style of the policy and failure to be more specific and allows us to assume that the city areas are the favoured location. The policy then fails to offer any other guidance on other areas which are not within the 8 key growth areas to how long term growth can be improved. It should be clearer in its growth focus and must allow the 9 local authorities to provide smaller scale growth areas within their Local Plans in the interests of effective and positive planning.	Town centres are covered under Policy JP-Strat 12 of the Plan. The overall spatial strategy of the Plan seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth and prosperity across all boroughs. PfE is a strategic level Plan - Local Plans will have to be in conformity with PfE and will provide further detail on the strategic policy areas within PfE within a local context, where appropriate. No change is considered necessary.	Shepherd Group
JP- J1.30	Only focused on Ashton under Lyne, rest of Tameside is disregarded and not included in job growth.	The overall spatial strategy of the Plan seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth and prosperity across all boroughs. Criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that	See Appendix

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		<p>employment growth opportunities are well connected and accessible to all residents. No change is considered necessary.</p> <p>Ashton Town Centre is identified as a 'Principal Town Centre' in Figure 3.1 'Key Diagram', page 40, and as a 'Strategic Location – Town Centre' in Figure 6.1 'Strategic Locations' page 113, of the Plan. Paragraph 4.47 of the Plan sets out that in relation to boosting Northern Competitiveness "investment in the town centres of the northern districts will be vital, particularly the town centres of Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale and Wigan". Ashton-under-Lyne is also listed under G(v) of Policy JP-J1, in relation to providing stronger focus for local economic activity. When the plan is read as a whole no change is considered necessary.</p>	
JP- J1.31	The historic environment forms a vital part of the plan area and therefore it should be part of the plan for economic growth and prosperity. In building a strong and competitive economy this chapter needs to demonstrate how it will conserve and enhance the historic environment and maximise opportunities from it including encouraging tourism, in the re-use of heritage assets, in creating successful places for businesses to locate and attract inward investment, town centres and for heritage-led regeneration. The heritage and tourism sector should be recognised within the policy through an additional criterion point.	The role of the historic environment in supporting economic growth is set out in the Spatial Strategy (e.g. JP-Strat2, para 4.28). Policy JP-P2 'Heritage' recognises the role of the historic environment. Local Plans will provide more detail on the integration of heritage assets to deliver wider benefits. When the plan is read as a whole no change is considered necessary.	Historic England
JP- J1.32	Welcome more innovation about employment space retention as well as better home design and the need to realise more significantly and quickly the new thinking around sustainable development of all kinds.	Sustainable development is covered under JP-S 1 'Sustainable Development'. No change considered necessary.	Mossley Town Council
	Strategic Locations		
JP- J1.33	There is a need to recognise the significance of the Wigan to Bolton Growth Corridor under the itemised list of part G of the policy.	The importance of the Wigan-Bolton Growth Corridor in having the potential to deliver significant benefits over a wider area and make a major contribution to raising the competitiveness of the northern areas as a whole is set out within JP-Strat 8 'Wigan-Bolton Growth Corridor' and identified in Figure 4.6, pages 65-66 of the Publication Plan.	Harworth Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J1.34	The Wigan-Bolton growth corridor should however be expanded to become a M6/HS2/M62 growth quadrant, benefitting from the West Coast Main Line and HS2 as well as east-west connections. It is noted that paragraph 4.54 refers to the M6 logistics hub - it would be appropriate to ensure the benefits of this hub are maximised. Therefore, the growth corridor should be extended to a growth quadrant would enable settlements such as Leigh, Atherton, Tyldesley, Lowton, Golborne and critically Garswood to share in the economic benefits that otherwise would be focused on town centres of Wigan and Bolton, and as such also accord with the more realistic cross-boundary sub-region located equidistant between Manchester and Liverpool.	PfE is a joint plan of nine Greater Manchester borough's - the plan area is set out within chapter 2 'Context' (figure 2.1). As such, any settlements outside of this boundary are not within the scope of the plan and as such no change is considered necessary.	Murphy Group Murphy Group
JP- J1.35	To ensure the policy is effective, positively prepared, and consistent with Policy JP-Strat 11 in terms of setting a clear economic vision and strategy for New Carrington the strategic allocation should be identified as a key growth location in part G of Policy JP-J 1.	New Carrington is covered by JP-Strat 9 'Southern Areas' and JP-Strat 11 'New Carrington' which seeks to deliver a significant mixed-use development and Policy JP Allocation 33 'New Carrington' which allocates the development site and provides more detailed requirements for its implementation. When the plan is read as a whole no change is considered necessary.	See Appendix
JP- J1.36	The policy further underpins the importance of the plans for Wythenshawe Hospital as well as the strategic allocations for Medipark and Timperley Wedge. Reference in this policy to Manchester Airport Enterprise Zone, Whythenshaw Hospital and HS2 is welcomed.	Support welcomed.	Manchester University Hospitals NHS
JP- J1.37	Recognition of the importance of the M6 logistics hub in Wigan, extending into Warrington, St Helens and West Lancashire as a key growth location is welcome. Also highlights the importance of delivering infrastructure improvements on the strategic road network where necessary to support planned growth (including the need for joint working in relation to Junction 23 of the M6).	Support welcomed.	St. Helens Council
JP- J1.38	Requests a clearer picture in the JPA-7 Plan of what type of employment opportunities will be available in the Bury area, where it will be located and at what cost to the environment.	The scale of employment growth which PfE intends to deliver in each district is set out within Chapter 5 'Places for Jobs' of the Plan (see tables 6.1 and 6.2). The Employment Topic Paper [05.01.04] sets out further information on employment needs.	Brian Hulme

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Bury is part of the North-East Growth Corridor covered under Policy JP-Strat 7, which includes Policy JP Allocation 1.1 'Heywood/ Pilsworth (Northern Gateway)' and Policy JP Allocation 1.2 Simister and Bowlee (Northern Gateway)' both partly within Bury. Bury's employment land supply, including the proposed strategic allocations listed above, can be viewed on MappingGM . No change is considered necessary.	
JP-J1.39	Policy JP-Strat 12 covers Greater Manchester's Main Town Centres and identifies that further opportunities will be taken to increase the population catchments of the centres including significantly increasing the resident population of the centres themselves. This is identified as being alongside rather than displacing the range of non-residential uses within town centres. Overall approach is supported but the policy should make clear that to ensure this can successfully be achieved alongside the existing range of non-residential uses the increased introduction of residential uses should not undermine the Main Town Centre's principal retail and service functions.	Policy JP-J1 explicitly recognises the need to protect the core retail and other non-residential uses which define town centres. No change is considered necessary.	RedleafVI (Ashton) Limited Partnership and Ellandi
JP-J1.40	How will HS2 benefit the area and not just move resources to London instead	Further detail on HS2 and its relationship to PfE is set out within Chapter 2 'Context', page 29, paragraph 2.23, of the Plan. However, the delivery of HS2 is not within the scope of the Plan as it is being dealt with at a national level.	Paul Roebuck
JP-J1.41	Part 'G' of the policy outlines that there will be an emphasis on maximising the potential of key growth locations. The policy lists eight of the 'key locations' but overlooks Stakehill. This does not align with the strategy outlined in Policy JP Strat 7, which seeks to deliver a nationally significant area of economic activity along the North-East Growth Corridor. Recommends changes to make policy effective as follows: "vii. The North East Growth Corridor (an expansion of Stakehill extending into Oldham and Rochdale)"	The list of key locations under point G of policy JP-J1.1 is not exhaustive. Policy JP-Strat 7 [page 62 of the Plan) recognises the inclusion of the Stakehill allocation within the North-East Growth Corridor, which when combined with the Northern Gateway allocations, will deliver a nationally significant area of economic activity and growth. Furthermore, figure 3.1 'Key Diagram' [page 38 of the Plan] identifies the key growth areas and strategic allocations, including Stakehill. Therefore, when the plan is read as a whole, no change is considered necessary.	Russell LDP
JP-J1.42	The planned developments at New Carrington (JPA 33) for example, do not meet the following measures set out at paragraph 6.15 (page 109): delivering sustainable places that can meet the needs of all sections of communities, both now and in the future; enhancing the supply of employment opportunities at a variety of skill levels throughout our boroughs to achieve more inclusive	It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] sets out the methodology for selecting the strategic allocations. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation. In	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>growth; enabling all residents to lead healthier lives in safer places with good access to facilities that support health and wellbeing including good quality open space and green infrastructure; and seeking a net enhancement to biodiversity across our boroughs.</p>	<p>relation to New Carrington, Policy JPA 33 sets out a policy framework to guide the development, alongside other PfE policies. The site allocation topic paper provides further detail on the proposals and how the allocation will deliver sustainable development in line with the thematic policies of the plan [10.09.07].</p> <p>Within the plan, policy JP-S 1 ‘Sustainable Development’ sets out specific policies to achieve sustainable development, including measures in relation to supporting infrastructure and biodiversity [see pages 82-83 of the Plan for the full policy]. Policy JP-P 5 ‘Education, Skills and Knowledge’ sets out significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester [see pages 182-184 of the Plan for the full policy]. Further information on skills and education in relation to supporting economic growth is set out within the Employment Topic Paper [05.01.04]. Policy JP-P 6 ‘Health’ includes measures to ensure development makes a positive contribution to health and wellbeing [see pages 184-186 of the Plan for the full policy]. Policy JP—P 1 ‘Sustainable Places’ also includes measures relating to the impact of development on people and the environment [see pages 174-177 of the Plan for the full policy]. Therefore, when the plan is read as a whole, no change is considered necessary.</p>	
JP- J1.43	<p>Figure 6.1 does not indicate this increased employment activity around the airport and HS2 station. RLAM would suggest that this is shown as a ‘Core Growth Area’ around Manchester Airport within the figure.</p>	<p>Figure 6.1 identifies key strategic growth locations. No specific allocations are identified on the plan, however the core growth area which covers the Greater Manchester city-region (the nine boroughs) is illustrated on the plan. Figure 3.1 ‘Key Diagram’ [page 38] identifies the key growth areas, strategic allocations, HS2 and Manchester Airport.</p> <p>Therefore, when the plan is read as a whole, no change is considered necessary.</p>	Royal London Asset Management RLAM

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J1.44	<p>The draft Policy seeks to maximise the potential of key growth locations in the northern conurbations, with the aim of securing investment in these locations to help raise their competitiveness. In south Manchester in contrast, employment land releases are poorly provided for, with the Plan's focus on supporting economic activity in town centres and around Manchester Airport.</p> <p>Within the PfE evidence base there has been no consideration of the characteristics, relative growth potential or market dynamics in the different parts of Greater Manchester, and in particular in South Manchester – which should be a fundamental and core input into the exercise of considering the appropriate distribution of employment land provision across GM.</p>	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. It is appropriate for the overall land supply targets set out in both JP-J 3 and JP-J 4 to be based on the employment land need figures, derived from the evidence base. The land supply data set out in tables 6.1 and 6.2 demonstrates that sufficient land has been identified over the course of the Plan to meet this need. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04].</p> <p>The spatial strategy of the Plan (Chapter 4) seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. As is set out in paragraph 4.21 the areas identified within the spatial strategy [illustrated in figure 4.1 'Spatial Strategy, page 48] do not have firm boundaries and are likely to evolve over time. Therefore, when the plan is read as a whole, no change is considered necessary.</p>	Morland Capital Partners No1 Ltd
JP- J1.45	<p>New Carrington is a strategic employment allocation which is identified as delivering 350,000 sq.m of employment floorspace. It is therefore a strategic location for employment development and should be included in Figure 6.1. Furthermore, there is lack of evidence to substantiate whether the north / south distribution of sites is appropriate in respect of industry and warehousing land, it is strongly recommended that the inclusion of a southern growth corridor which extends to include the Site and New Carrington as a strategic location for employment development is identified.</p>	<p>Figure 6.1 identifies key strategic growth locations. No specific allocations are identified on the plan, however the core growth area which covers the Greater Manchester city-region (the nine boroughs) is illustrated on the plan. Figure 3.1 'Key Diagram' [page 38] identifies the key growth areas and strategic allocations.</p> <p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. It is appropriate for the overall land supply targets set out in both JP-J 3 and JP-J 4 to be based on the employment land need figures, derived from the evidence base. The land supply data set out in tables 6.1 and 6.2 demonstrates that sufficient land has been identified over the course of the Plan to meet this need. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester</p>	Morland Capital Partners No1 Ltd

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		[05.01.02] and Employment Topic Paper [05.01.04] . Therefore, when the plan is read as a whole no change is considered necessary.	
	Impact on climate change		
JP- J1.46	<p>Development will lead to increased carbon emissions, negatively impacting on air quality, increasing traffic.</p> <p>In particular, expansion of the Airport will also lead to poor air quality and increased carbon emissions. Plan should be rewritten with proposals for reducing the number of flights and eventual closure of one runway. Proposals should specify a strategy for alternative employment and economic activity to replace dependence on the city regions aviation economy.</p> <p>Inconsistency of the policy with net zero emissions and other environmental aims. These concerns include the wording (set out in clause G of the policy) to "maximise the potential... of locations such as the airport, HS2 and the M6 logistics hub. The approach in its current form is not fully consistent with achieving net zero emissions by 2038 or delivering the wider environmental objectives of the Plan. The policy should be revised to make it clearer that growth in these locations must be of a sustainable nature and at a level which complies with other Plan objectives around climate change and other environmental concerns.</p>	<p>The Clean Air (Policy JP-S 6), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address these environmental issues.</p> <p>In relation to Manchester Airport, JP-Strat 10 sets out measures for addressing climate change issues as part of its development. When read as a whole no change is considered necessary.</p>	See Appendix
JP- J1.47	<p>Recognise the importance of ensuring there is a supply of employment sites and premises across the Plan area (paragraph 6.16, page 112), however to achieve sustainable development, GM's climate emergency goals and the transition to carbon neutral, economic growth must be put on a par with the health and wellbeing of GM's residents, the importance of improving biodiversity and the essential role of our green belt and green spaces. This means that GM should have a greater focus on existing employment sites, especially those that are dilapidated and underused, improving land utilisation (multistorey warehousing) and the potential for repurposing some of the unused office land (paragraphs 7.5 and 7.6, Employment Topic Paper, page 40). These alternatives are not set out in the Plan, which is, therefore, not Justified. With this in mind, it is premature to release green belt or protected</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>The Sustainable Development (JP-S 1), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address climate</p>	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	open land for employment land supply purposes. Economic opportunities that result from the transition to carbon neutral can arise from natural solutions providing employment for those who are interested in enhancing our natural assets.	change and sustainable development. Therefore, when the plan is read as a whole no change is considered necessary.	
	Support for Allocations/ Approach		
JP- J1.48	Supports the allocation at Stakehill	Support for the allocation is noted.	See Appendix
JP- J1.49	Support the employment allocation at Broadbent Moss	Support for the employment portion of the allocation is noted.	See Appendix
JP- J1.50	General support for the policy in terms of growth ambitions, objectives, growth locations, role of town centres etc.	Support for general ambitions of the policy is noted.	See Appendix
	No comments provided		
JP- J1.51	Plan is unsound – no specific comments provided.	It is considered that the plan is sound and that an appropriate evidence base has been developed in order to support policy JP-J2.	See Appendix

PfE 2021 Policy JP-J2, Employment Sites and Premises

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General/ plan-wide		
JP-J2.1	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before “Places for Everyone” can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write.	As stated at paragraph 1.22 of the Places for Everyone Plan, The impact of the five different changes between the GMSF2020 and the PfE2021, together with that of their cumulative impact was considered and it was determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations. No change is considered necessary.	See Appendix
JP-J2.2	Sections 20 to 23 relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Plan Review process. It is assumed that the Greater Manchester Combined Authority has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of this plan. The documentation is inconsistent, incoherent in parts and does not currently justify and support the Plan as drafted.	No change considered necessary. Comment not relevant to JP-J1, however the Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 . and is supported by a proportionate evidence base [see supporting documents page] . Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan .	See Appendix
JP-J2.3	The Publication Plan has not had due regard to the provisions of the latest draft of the NPPF, and specifically Section 13, Paragraph 141 and the strategy to be assessed in relation to justifying that exceptional circumstances exist to change Green Belt boundaries	It is considered that the Publication Plan is in line with NPPF. In relation to para 141, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the	See Appendix

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		strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . No change is considered necessary.	
JP-J2.4	PfE is virtually silent on Minerals	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.	Mineral Products Association
JP-J2.5	Respondent believes policy is unsound and would therefore like to see employment land at Timperley Wedge specifically included in the wording of this policy as a local employment area as it has the potential to deliver 60,000sqm of employment floorspace if allocated, in order to make it sound.	Timperley Wedge is included as an office employment site in the existing supply and shown in figure 6.2. It is considered to be included within the policy in criteria 3 within the environs of the Manchester Airport Enterprise zone. It is also covered by allocation JPA3.2. As such, no change is necessary	Peel L&P Investments (North Ltd)
JP-J2.6	The policy should be amended so that it makes reference to the need for each of the Authority's respective Local Plans to allocate non-strategic sites in order to meet their respective minimum employment land requirements.	The employment land supply is made up of the existing baseline supply and the proposed strategic allocations within the Plan. Some of the sites in the existing baseline supply will be allocated as employment sites within district's respective Local Plans as appropriate. It is important that when reviewed Local Plans set out measures to meet their employment needs as appropriate. No change is considered necessary.	Casey Group
JP-J 2.7	Need to liaise with local business	This Places for Everyone Plan is the result of a process that began with the publication of the first Greater Manchester Spatial Framework in 2016 and has been informed by the feedback received from residents, businesses and community organisations. No change is considered necessary.	Michelle Cardno
JP-J 2.8	Lack of supporting infrastructure	Furthermore, there are also a number of policies in the Publication Plan that seek to address this matter, such as policies JP-G6 Urban Green Space; JP-P5 Education, Skills and Knowledge; and JP-P6 Health; JP-P7 Sport and Recreation. Supporting these are the overarching policies of Policy JP-P1 Sustainable Places, which sets out key attributes that all development, wherever appropriate, should be consistent with including	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		being supported by critical infrastructure, such as energy, water and drainage and green spaces; and Policy JP-D2 on Developer Contributions.	
JP-J 2.9	<p>What additional consideration has been paid in relation to securing the provision of employment uses within town centre locations given lifestyle changes and the increased levels of online shopping?</p> <p>The changes being seen in our High Street offers an ideal situation to increase employment opportunities for non-retail uses in locations which are the most accessible and sustainable. This could facilitate a significant reduction in the land being development on the edge of urban areas and could remove the need to release land from the Green Belt.</p>	<p>Town centre locations are considered important in terms of providing employment uses, such as offices, as is set out within Policy JP-Strat 12.</p> <p>As is referenced in policy JP-J2 (para.2) policy JP-J1 (criterion Gv) identifies town centres as a key location that will help to maximise economic growth. The plan should be read as a whole, therefore no change is considered necessary.</p>	Save Greater Manchesters Green Belt (SGMGB)
JP-J 2.10	Report attached which recommends some medium to long term interventions aimed in particular at expanding the freight offering, since movement of goods by road is the most difficult to decarbonise and future demand is likely to exceed that available at Trafford Park	Comment/ evidence noted.	Rail future Ltd
	Approach/ Strategy		
JP-J 2.11	There's limited alignment between the Greater Manchester Economic Strategy and the location of employment sites.	<p>The vision, objectives and spatial strategy contained in PfE are guided by the Greater Manchester Strategy, in fact they share a common vision. The economic strategy in PfE complements that within the Local Industrial Strategy. The strategy maximises the potential of key growth locations across the conurbation, which collectively meet the strategy. These locations range from core conurbation areas such as the City Centre, the Quays and Trafford Park to new areas that will boost the competitiveness of the north, such as Heywood/ Pilsworth (Northern Gateway) and locations such as the Manchester Airport Enterprise Zone which will help to sustain the competitiveness of the south. It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] sets out the methodology for selecting the strategic allocations. Furthermore, each strategic allocation policy chapter within the Plan</p>	See Appendix

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		includes a reasoned justification for the allocation. No change is considered necessary.	
JP- J2.12	The distribution of employment floorspace is disproportionate, with almost three times more employment floorspace expected to come forward in major locations in the north compared to the south.	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>As is set out in Chapter 2 'Context', the spatial strategy of the Plan seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. As is set out in paragraph 4.21 the areas identified within the spatial strategy [illustrated in figure 4.1 'Spatial Strategy, page 48] do not have firm boundaries and are likely to evolve over time. No change is considered necessary.</p>	Save Royton's Greenbelt Community Group
JP- J2.13	The vast majority of the office supply (88%) is derived from previously developed sites; without a detailed assessment it is not clear whether such sites are suitable, viable or attractive to the market.	<p>Each local authority has analysed their own employment supply and followed guidance set out in NPPG to determining deliverability of sites included within the baseline supply.</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	Morland Capital Partners No1 Ltd
JP- J2.14	Green Belt is mainly being released to cater for growth in logistic operations; these typically provide lower skilled, lower value employment opportunities, and fewer jobs per hectare than other industrial and warehousing uses such as advanced manufacturing	The Greater Manchester Strategy and Local Industrial Strategy sets out ambitions to deliver good quality, high- skilled jobs. PfE seeks to provide land to meet the widest range of employment opportunities to ensure Greater Manchester remains as competitive as possible and provides sites for advanced manufacturing, digital and tech jobs, for example, at Heywood/Pilsworth (Northern Gateway).	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that employment growth opportunities are well connected and accessible to all residents. It is considered that the employment allocations and the existing baseline supply across the plan area will provide a range of employment opportunities in various sectors. Local Plan's (and their evidence base) may provide further policy/analysis on their borough's key sectors and employment opportunities. No change is considered necessary.</p>	
JP-J2.15	<p>The spatial distribution of employment land is not justified; a more sophisticated strategy should be formulated to reflect the varying nature of employment land requirements across Greater Manchester (in terms of type, size and location), and which identifies the most appropriate locations for meeting identified requirements.</p> <p>A balance has to be struck between providing businesses with a range of locations to choose from, and the Framework's strategy determining the pattern of employment development.</p>	<p>As is set out in Chapter 2 'Context', the spatial strategy of the Plan seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. It is considered that the distribution of employment land identified within the Plan supports the spatial strategy aiming to reduced inequality and enhance growth in key locations across the plan area whilst meeting employment needs overall. No change is considered necessary.</p>	See Appendix
JP-J2.16	<p>PfE hasn't modelled the impact of the carbon emissions of the plan. The plan needs to be rewritten taking into account proper research into employment needs and investment potential with proper safeguards to protect greenbelt and climate change agenda.</p>	<p>The Sustainable Development (JP-S 1), Carbon and Energy (JP-S 2) and Resilience (JP-S 4) policies set out specific policies to address climate change. This chapter of the Plan (Chapter 4 'Sustainable and Resilient Places') is supported by an extensive evidence base. The Carbon and Energy Topic Paper [04.01.05] provides a summary of this evidence [see chapter 3 'Local Policy and Evidence', pages 24-62].</p> <p>Further evidence has been produced in relation to the employment land demand over the life time of the plan period. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04]. No change is considered necessary.</p>	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.17	<p>Policy JP-J2 also sets out that employment areas will be protected from redevelopment for other uses - such an approach is in conflict paragraph 122 of the NPPF 2021 which states where there are no reasonable prospects of an application coming forward for allocated uses, applications for alternative uses on the land should be supported providing the proposed use would contribute to meeting an unmet need for development in the area.</p> <p>The Plan needs to specify that any new office and retail space should be easily convertible into residential usage if that later became necessary. PfE para 6.17 states that "employment sites and premises must adapt to changing circumstances, technological advancements and new working practices" [which must include working from home]). But PfE para 6.22 (and Policy JP J3) both discourage that adaptation.</p>	<p>The plan has been prepared in accordance with NPPF. It is important that there is some protection of employment land to ensure the employment needs of the plan area can be met. Whilst the protection of employment areas is supported through PfE, any decisions on redevelopment of employment land will be dealt with through the normal planning process at a local level in line with Local Planning Policies. No change is considered necessary.</p>	See Appendix
JP- J2.18	<p>This Policy states that "Existing employment areas that are important to maintaining a strong and diverse supply of sites and premises in our boroughs will be protected from redevelopment to other uses". Whilst we understand that a significant loss of employment uses in certain areas might be undesirable, but there are other uses which can be considered employment generating which would be far more beneficial than vacant employment buildings. Areas change and this policy does not provide sufficient flexibility and would appear to run contrary to the Governments current thinking in relation to providing more flexibility, for example, through permitted development rights. In order for the policy to be found sound, request to Delete the last paragraph, or define those areas that really are 'strategic' and remove the words 'This will include' which infers additional sites could fall within this policy.</p>	<p>The plan has been prepared in accordance with NPPF. It is important that there is some protection of employment land to ensure the employment needs of the plan area can be met. Whilst the protection of employment areas is supported through PfE, any decisions on redevelopment of employment land will be dealt with through the normal planning process at a local level in line with Local Planning Policies.</p> <p>Permitted development rights currently exist to allow certain changes of use as set out in the regulations. Permitted development rights are outside the scope of PfE. No change is considered necessary.</p>	Orbit Developments (Manchester) Ltd
JP- J2.19	<p>"The wording of the policy needs to be amended so that it reads ""A diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost..."</p>	<p>Policy JP-P1 'Sustainable Places' sets out measures for ensuring that development is socially inclusive (point 3), and easy to move around for those of all mobility levels (point 13). The plan should be read as a whole and as such no change is considered necessary</p>	Greater Manchester Coalition of Disabled People and Manchester Disabled

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Peoples Access Group
JP-J2.20	Policy JP-P 2 should include the release of land using a 'safeguarded land ' mechanism to ensure the supply long-term.	A 31% margin of flexibility has been added when calculating the employment land needs for offices and industry and warehousing, based on previous studies and external advice provided (see Employment Topic Paper [05.01.04] . pages 17-18). Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the demand for employment land, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that JP-J2 provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF. No change is considered necessary.	Milnes Gaskell Estate
JP-J2.21	The policy should not completely restrict the re-development of employment sites for other uses.	As stated in Policy JP-J2, it is those employment areas that are important to maintaining a strong and diverse supply of sites, including our strategic locations at Tame Valley and the core of Trafford Park which will be protected. This approach is considered consistent with our overall vision and objectives and NPPF, therefore no change is considered necessary.	Milnes Gaskell Estate
JP-J2.22	Economic growth must be on a par with GM residents health and wellbeing, improving biodiversity, retaining greenspaces and addressing climate change. Therefore PfE should have greater focus on existing employment land especially those that are dilapidated and under used, improving land utilisation (multistorey warehousing) and the potential for repurposing some unused office land. These alternatives are not set out within the plan therefore it is not justified and premature to release Green Belt or OPOL land for employment.	<p>The vision and strategic objectives for PfE are wide ranging and aim to ensure that all residents of GM can benefit from growth. There are specific policies within the plan which support health and wellbeing (JP-P6), biodiversity (JP-G9), greenspaces (see policies within Chapter 8 'Greener Places') and climate change (see policies within Chapter 5 'Sustainable and Resilient Places'). When read as a whole PfE ensures a commitment to sustainable development.</p> <p>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</p>	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]. No change is considered necessary.</p>	
JP-J2.23	<p>The Policy does not consider the Employment Sites and Premises needed to support the Rural Economy, meaning it is not Positively Prepared, Justified or Consistent with National Policy. The Policy should be updated to include reference to the Employment Sites and Premises needed to support the Rural Economy and a new section should also be added to this Plan to support this requirement (after Industrial and Warehousing Development). The KPIs then need to be updated to ensure they measure all aspects of this Policy.</p>	<p>Chapter 4 'Strategy' of PfE identifies the Plan's approach to achieving the vision of the Greater Manchester Strategy. This chapter identifies the key growth areas, as is illustrated in Figure 4.1 'Spatial Strategy' and listed under paragraph 4.21.</p> <p>JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play across the PfE area, including in terms of the economy. When the plan is read as a whole no change is considered necessary.</p> <p>In relation to the KPIs, 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.</p>	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.24	The Policy does not make it explicit that it will comply with Objective 3 (main document, page 40), in terms of prioritising the use of brownfield land and the Policy must be updated to reflect this.	Policy JP-S1 sets out a very clear preference for using previously developed (brownfield) land and vacant buildings to meet development needs. The plan needs to be read as a whole and therefore there is no need to repeat this in other policies. No change is considered necessary.	Friends of Carrington Moss
JP- J2.25	The Plan needs to specify that any new office and retail space should be easily convertible into residential usage if that later became necessary. PfE para 6.17 seems to foreshadow this “employment sites and premises must adapt to changing circumstances, technological advancements and new working practices” [which must surely include working from home]). But PfE para 6.22 (and Policy JP J3) both discourage that adaptation.	The plan has been prepared in accordance with NPPF. It is important that there is some protection of employment land to ensure the employment needs of the plan area can be met. Whilst the protection of employment areas is supported through PfE, any decisions on redevelopment of employment land will be dealt with through the normal planning process at a local level in line with Local Planning Policies. No change is considered necessary.	Peter Thompson
JP- J2.26	Support objective of wording to increase the delivery of previously developed sites (PDL), as this could reduce pressure to release greenfield sites. We recommend changing the last sentence of paragraph 2 within policy JP-J2 “We will work with Government and other stakeholders to increase the delivery of previously developed sites for employment use (where this does not conflict with other policies in PfE or the NPPF), and hence minimise the need for any further Green Belt release.	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 Wildlife Trusts
JP- J2.27	The policy needs to be more direct over the opportunity present for the historic environment as part of the economic strategy for the plan area. Recommendation is as follows: "The opportunity for the adaptive reuse of former mill stock to appropriate alternative employment sites will be supported." Insert new sentence into supporting justification: “There is evidence to show that within the Plan area, that alongside other northern areas there is a significant opportunity for repurposing mills into mixed use sites for uses including light industrial, office space and housing (with potential space for around 41,500 jobs, source Historic England), the plan supports this opportunity as a mechanism for heritage led regeneration”.	Some sites within the employment land baseline supply are made up of historic mill buildings, particularly in the north of the conurbation. By being included in the baseline supply PfE recognises and supports the reuse of mill stock as employment sites where appropriate. The role of the historic environment in supporting economic growth is also set out in the Spatial Strategy (e.g. JP-Strat2, para 4.28). As such when the plan is read as a whole no change is considered necessary.	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.28	There is little synergy between employment and housing requirements which could have the potential of building on greenbelt whilst increasing car journeys as there could be a mismatch between the two.	The housing need has been calculated using the standard methodology as set out by NPPF - further information on the housing need methodology is provided in the Housing Topic Paper [06.01.03] . PfE identifies a range of new housing sites, in a variety of locations. The varied mix of sites, supported by the necessary infrastructure will provide the right level and mix of homes needed to support the economic growth. Also, Policy JP-C 1 'An Integrated Network' sets out measures for ensuring a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services; and includes measures to increase cycling and walking infrastructure. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.	Julie Halliwell
JP- J2.29	A full audit of existing sites and the success/failure of previous schemes needs to be undertaken. It is no good ploughing on with building additional facilities of existing sites remain empty or only partially filled - Foxdenton in Oldham is a prime example of a scheme that failed to live up to its promised potential.	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>There is evidence that past completions have been constrained by the lack of suitable sites resulting in Greater Manchester being unable to compete for some major occupiers. When combined with the need to secure a significant increase in the quality of accommodation across the city-region to respond to evolving business requirements and increasing globalisation, the identified demand and therefore land supply is considered appropriate.</p> <p>The Employment Topic Paper [05.01.04] sets out the methodology for calculating employment need/ demand. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	See Appendix
JP- J2.30	Warehousing comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in	It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>Greater Manchester. The North-East Growth Corridor would further exacerbate this problem. The old mill towns such as Oldham and Rochdale have been the hardest hit by de-industrialisation; warehousing and distribution have filled the gap and been effective at reconfiguring the mills as distribution centres. Storage and distribution are low-density employment i.e. it is not an efficient use of employment space. This type of employment is also typically low skilled and low paid. This will stifle economic growth rather than accelerate it because it imposes a ceiling on productivity. There is a perception amongst residents that the less productive industries are being forced into the north of the conurbation to free up premium employment space in the south. The key to boosting northern competitiveness is to diversify industry and increase opportunity across the region. Secondly, storage and distribution are extremely vulnerable to automation. In its employment land projections, PfE bases its projections on the assumption that the employment density of I&W will not change, but this is unrealistic.</p> <p>The North-East Growth Corridor may lead to an over-supply of warehousing in a small geographic area, whereby Oldham, Bury and Rochdale are competing for the same businesses. This would reduce the effectiveness of the Northern Gateway and Stakehill and forecasts more unemployment into Oldham's and Rochdale's economic futures. This is being dictated not be actual need in the north, but a desire to outsource the problems of the boroughs in the south of GM. As such Oldham and Rochdale would be tying themselves to the needs of the southern borough's. It is considered that the policy as drafted is unsound as it has not been positively prepared and once again has not been sufficiently justified.</p>	<p>Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation. It should also be noted that the Industry and Warehousing supply includes sectors such as advanced manufacturing and research and development. Therefore, the employment supply at the North-East Growth Corridor is not solely focused on warehousing but includes several diverse sectors which provide an opportunity to diversify the employment offer in this location.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	
JP- J2.31	<p>Policy JP-Strat 7 (North-East Growth Corridor) needs to be completely re-written to ensure that industry and employment in the North of the conurbation is diversified and delivers GVA growth in line with the rest of Greater Manchester. The Northern Gateway should be turned into a reserved Broad Location for growth - JPA 1.1 (Heywood/Pilsworth); JPA 1.2 (Simister and Bowley). JPA 2 (Stakehill) should be deleted.</p>	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Furthermore, each strategic allocation</p>	Save Royton's Greenbelt Community Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>policy chapter within the Plan includes a reasoned justification for the allocation.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	
JP- J2.32	<p>The evidence base fails to consider the characteristics, relative growth potential, or market dynamics in different parts of GM, and in particular South Manchester. This lack of commercial analysis of the city region submarkets questions whether the north / south balance is appropriate in respect of industry and warehousing land.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. See supporting evidence Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04].</p> <p>As is set out in Chapter 2 'Context', the spatial strategy of the Plan seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. As is set out in paragraph 4.21 the areas identified within the spatial strategy [illustrated in figure 4.1 'Spatial Strategy, page 48] do not have firm boundaries and are likely to evolve over time. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	Morland Capital Partners No1 Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.33	<p>As set out in Icenis report, in Manchester, as with elsewhere in the UK, the supply of available warehouse space has not been able to keep pace with the surge in demand. Research compiled by Taurus Properties indicates that warehouse space has decreased dramatically in the last 12 months to stand at 2.7m sq.ft across 14 separate units. Using the three-year average annual take-up of 4.56m sq.ft, this equates to just 0.59 years' worth of supply in the North West. Furthermore, the lack of available sites means that the supply is constrained and skewed towards the smaller size bands (between 100,000 sq.ft and 300,000 sq.ft).</p> <p>Questions the suitability of the sites allocated for warehousing and logistics due to their inability to meet market demand. There is a substantial shortfall of land capable of meeting larger industrial and warehousing needs within Trafford. Failure to identify a sufficient supply of employment sites in appropriate locations will mean that businesses will locate to areas outside of GM. To address this issue, it is recommended that an additional site [see supporting information submitted] be allocated [Parcel A], and the identification of a southern growth corridor which extends to include the Site [Parcel A] and New Carrington as a strategic location for employment development. The provision of a southern growth corridor will ensure that demand for employment development is accommodated, without generating unsustainable travel patterns.</p>	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04]. Sufficient land has been identified to meet the employment land needs across the plan area and it has been distributed in line with the spatial strategy. This includes Trafford and therefore no further employment sites are required.</p> <p>Policy JP-C 1 'An Integrated Network' sets out measures for ensuring a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services; and includes measures to increase cycling and walking infrastructure. The New Carrington allocation will be supported by a range of sustainable transport schemes – see New Carrington Locality Assessment [09.01.15] and [09.01.27], which will improve access to the employment opportunities at New Carrington.</p> <p>An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	Morland Capital Partners No1 Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.34	The policy fails to meet guidance set out in the Housing and Economic Development Needs Assessments Section of PPG as the spatial strategy fails to account for market signals.	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and the need to have sufficiently attractive sites and premises to meet the overall ambitions of the Greater Manchester Strategy and Local Industry Strategy.</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. No change is considered necessary.</p>	Morland Capital Partners No1 Ltd
	Deliverability/ viability		
JP- J2.35	There's no evidence that the deliverability of the strategic employment/mixed-use allocations within these two northern corridors has been assessed.	<p>A strategic viability assessment, [03.01.01] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>Deliverability is discussed within the Site Allocation Topic Papers. There is a Topic Paper for each allocation. For Allocations within the North-East Growth Corridor see: 'JPA1.1 Heywood/ Pilsworth (Northern Gateway) Allocation Topic Paper' [10.01.54, Section E]; 'JPA1.2 Simister/ Bowlee (Northern Gateway) Allocation Topic Paper' [10.01.55, Section E]; 'JPA2 Stakehill Allocation Topic Paper' [10.01.56, Section E].</p> <p>For Allocations within the Wigan-Bolton Growth Corridor see: 'JPA 4 Bewshill Farm Allocation Topic Paper' [10.02.05, Section E]; 'JPA 5</p>	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Chequerbent North Allocation Topic Paper' [10.02.06, Section E]; 'JPA 6 West of Wingates M62 Junction 6 Allocation Topic Paper' [10.02.07, Section E]; 'JPA34 M6 Junction 25 Allocation Topic Paper' [10.10.11, Section E]; 'JPA37 West of Gibfield Allocation Topic Paper' [10.10.14, Section E]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.	
	Land Supply/ Need/ Demand		
JP- J2.36	The evidence suggests that the employment land baseline supply is mainly poor quality and heavily constrained (preventing sites from being used effectively).	<p>Each local authority has analysed their own employment supply and followed guidance set out in NPPG to determining deliverability of sites included within the baseline supply.</p> <p>It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and ensure flexibility in supply to ensure there is sufficiently attractive sites and premises to meet the overall ambitions of the Greater Manchester Strategy and Local Industry Strategy.</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04].</p>	Morland Capital Partners No1 Ltd
JP- J2.37	When looking over the past two decades the need for B2 and B8 has been significantly overestimated (evidenced at previous draft plan stages). This also has the inflationary impact of pushing upward the housing numbers more than they should be.	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. No change is considered necessary.	Campaign to Protect Rural England (CPRE)
JP- J2.38	A comprehensive review of land supply should be carried out (in collaboration with local residents and their representatives) prior to the release of any green belt or protected open land for employment sites - in advance of the results of that review being available, developers should be pointed to existing sites. the detailed review mentioned above should also consider an assessment of land supply impacts arising from Brexit, the pandemic (i.e. increased working from home) and the recent changes to the permitted development scheme.	<p>Local authorities undertake a review of land supply on an annual basis. This is published on district websites and/or MappingGM. This information is publicly available.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning</p>	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.	
JP- J2.39	There is little evidence of demand, how and which employers and industries would be encouraged or would want to invest in these areas. The policy is currently "build it and they shall come" which is not a plan but a wish list. Needs proper research into employment needs and demand. No detail on what jobs will be created.	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. No change is considered necessary.	See Appendix
JP- J2.40	Offices are already vacant	Supporting evidence has been produced to identify the plan areas employment needs. It is appropriate for the overall land supply targets set out in both JP-J 3 and JP-J 4 to be based on the employment land need figures, derived from the evidence base. It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01] ; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04] . No change is considered necessary.	See Appendix
	Specific site comments		
JP- J2.41	Request the removal of warehousing from Pilsworth/Heywood and Stakehill	It is considered that appropriate evidence has been produced to justify and support the site allocations. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. The reasoned justification for the allocations at Pilsworth/ Heywood (JPA 1.1, pages 223-230) and Stakehill (JPA 2, pages 235-239) is provided within the allocation chapter in the Plan. As such no change is considered necessary. Further information can be found in the corresponding Topic Papers for the allocations at Heywood / Pilsworth [10.01.1.1] and Stakehill [10.01.02] .	Save Greater Manchesters Green Belt (SGMGB)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP- J2.42	The policy as is, is considered unsound and needs to be amended to allow for an increase in employment floorspace in the north-south M6 corridor in Wigan.	It is considered that an appropriate supply of sites has been identified in line with the employment need evidence. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. No change is considered necessary.	Harworth Group Plc.
JP- J2.43	Request a change to the boundary of JPA 6 – West of Wingates / M61 Junction 6	It is considered that appropriate evidence has been produced to inform and support the site allocations. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation. In relation to JPA 6, the allocation topic paper provides rationale in relation to the site's selection [10.02.07] . No change is considered necessary.	Harworth Group
JP- J2.44	In order for the policy to be found sound, the policy wording needs to be amended so that New Carrington is identified in both JP-J1 and J2	New Carrington is covered by JP-Strat 9 and JP-Strat 11 which seeks to deliver a significant mixed-use development. Policy JP Allocation 33 'New Carrington' allocates the development site and provides more detailed requirements for its implementation. As such when the plan is read as a whole no change is considered necessary.	See Appendix
	Support for Policy		
JP- J2.45	General support for policy/ allocations. Landowner support for sites at Meek Street, Higginshaw, Oldham and Stakehill.	Support noted.	See Appendix
	No comments provided		
JP- J2.46	Plan is unsound – no specific comments provided.	It is considered that the plan is sound and that an appropriate evidence base has been developed in order to support policy JP-J2.	See Appendix

PfE 2021 Policy JP-J3 - Office Development

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General/ Plan-wide		
JP-J3.1	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before “Places for Everyone” can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write.	As stated at paragraph 1.22 of the Places for Everyone Plan, The impact of the five different changes between the GMSF2020 and the PfE2021, together with that of their cumulative impact was considered and it was determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations. No change is considered necessary.	See Appendix
JP-J3.2	Sections 20 to 23 relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Plan Review process. It is assumed that the Greater Manchester Combined Authority has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of this plan. The documentation is inconsistent, incoherent in parts and does not currently justify and support the Plan as drafted.	No change considered necessary. Comment not relevant to JP-J1, however the Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 . and is supported by a proportionate evidence base [see supporting documents page]. Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan .	See Appendix
JP-J3.3	The Publication Plan has not had due regard to the provisions of the latest draft of the NPPF, and specifically Section 13, Paragraph 141 and the strategy to be assessed in relation to justifying that exceptional circumstances exist to change Green Belt boundaries	It is considered that the Publication Plan is in line with NPPF. In relation to para 141, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]. No change is considered necessary.	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-J3.4	The plan is virtually silent in terms of minerals	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 Planning Association
JP-J3.5	Disagree with the Places for Everyone-IA that JP-J 3 will have the following effects on IA Objective 16: Neutral/no effect (o) on assessment criteria Improve landscape quality and the character of open spaces and the public realm Neutral/no effect (o) on assessment criteria Conserve and enhance the historic environment, heritage assets and their setting Neutral/no effect (o) on assessment criteria Respect, maintain and strengthen local character and distinctiveness. Consider that as drafted the policy and the Chapter as a whole would be incompatible (-) with IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] . No change is considered necessary.	Historic England
	Strategy/ Approach		
JP-J3.6	Brexit and the pandemic need to be considered this also does not take into consideration the commute into the city centre and town centres. The digital economy surely leads to less reliance on buildings. Covid has opened a whole new way of working and many people/companies have discovered the benefits of home working.	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] . No change is considered necessary.	
JP-J3.7	The PfE is silent on the rural economy	JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play across the PfE area, including in terms of the economy. When the plan is read as a whole no change is considered necessary. Nevertheless, it is also considered more appropriate for the individual boroughs to deal with matters such as farm diversification via their respective Local Plans. No change is considered necessary.	Campaign to Protect Rural England (CPRE)
JP-J3.8	In order to ensure that the policy can be found sound, request the deletion of the last paragraph of the policy, which supports the use of Article 4 directions.	It is considered that the policy provides flexibility allowing local authorities to take any decisions on the undertaking of Article 4 Directions as appropriate based on local circumstances. In any case, permitted development rights exist allowing some changes of use in permitted areas. As such, no change is considered necessary.	Mark H Burton
JP-J3.9	The Plan needs to specify that any new office and retail space should be easily convertible into residential usage if that later became necessary. PfE para 6.17 seems to foreshadow this (“employment sites and premises must adapt to changing circumstances, technological advance- ments and new working practices” [which must surely include working from home]). But PfE para 6.22 (and Policy JP – J3) both discourage that adaptation.	The plan has been prepared in accordance with NPPF. It is important that there is some protection of employment land to ensure the employment needs of the plan area can be met. Whilst the protection of employment areas is supported through PfE, any decisions on redevelopment of employment land will be dealt with through the normal planning process at a local level in line with Local Planning Policies. No change is considered necessary.	Peter Thompson
JP-J3.10	The policy can be strengthened and made sound by including the following commitments: a comprehensive review of Employment Land Supply should be undertaken (in collaboration with local residents and their representatives) and should consider whether any of the over-supply of office space can be	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	utilised for other purposes; any proposals to release green belt for office space within the Plan should be removed; the KPIs need to be updated to ensure they measure all aspects of this Policy.	In relation to the KPIs, 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. As such no change is considered necessary.	
JP-J3.11	As per policy JP-J 2 there is a clear role for heritage assets forming part of the strategy for office space within the plan area. Those areas identified as having strong potential for office development Manchester, Salford and Bolton all have large potential for the adaptation and reuse of heritage assets as office space. This should be recognised within the policy. A sentence should be added to the penultimate paragraph of the policy to read: “The refurbishment of existing office accommodation will be encouraged including improving standards of accessibility. Opportunities for the reuse of former mill buildings and the sympathetic adaptation of other heritage assets will be supported.”	The role of the historic environment in supporting economic growth is set out in the Spatial Strategy (e.g. JP-Strat2, para 4.28). Policy JP-P2 ‘Heritage’ recognises the role of the historic environment. Local Plans will provide more detail on the integration of heritage assets to deliver wider benefits. When the plan is read as a whole no change is considered necessary.	Historic England
	Employment Supply/ Need/ Demand		
JP-J3.12	PfE inexplicably adopts assumptions about job creation that are well below: a) recent rates – 2.2% between 2014 and 2019; b) long term averages – 1.0% over the period 2000 to 2019; and c) the rates of competitor global cities – average of 1.2% between 2001 and 2016	It is considered that an appropriate evidence base has been prepared to support the Plan. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] . No change is considered necessary.	Peel L&P Northern Investments
JP-J3.13	The amount of office space identified in Policy JP-J 3 has actually increased by 258,058 sqm since the GMSF Regulation 18 stage consultation. Now Stockport’s office requirement is excluded (it had 92,651 sqm allocations) and the plan period has reduced from 2018 to 2037 to 2021-37 a reduction would have been expected over the 17-year time frame, rather than 19-year period. Estimated completions in 2021 amount to 146, 718 sqm and this should mean there is a reduction in the overall	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] .	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>requirement for office space. Many companies are expecting to encourage a reduction of office space and more home working. Manchester Airport Enterprise Zone and its environs is unsound as it encourages office development at a time when the need for office space is reducing. The impacts of home-working and impact of Covid need to be understood better. Therefore less office development should be identified over the lifetime of the plan.</p> <p>Some authorities have identified more brownfield land for office land uses, however Rochdale appears to have reduced the quantum of office space focus on brownfield down to 19% and have increased its focus in the Green Belt. The increase is considered unnecessary.</p>	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>Table 6.1 sets out the plan area's office land supply for 2020-2037. The majority of Rochdale's existing office land supply is on Kingsway Business Park (KBP) which is a greenfield site. Since previous versions of the plan, Rochdale has not added any Green Belt or greenfield land for office supply. In fact, Green Belt land at Kingsway South has been removed since the draft plan and is now only identified as a 'Broad Location' – identified in figure 4.2, page 63.</p> <p>It should be noted that in the plan context, greenfield and Green Belt land are different. Green Belt land is proposed to be released through the plan and is set out in column five of table 6.1. Greenfield land relates to other land that is not considered previously developed but is not identified as Green Belt – as set out in column three. No change is considered necessary.</p>	
	1. City Centre/ 2. The Quays		
JP-J3.14	Trafford City should be identified within Policy JP-J 3 alongside The Quays and City Centre as a key location for office development.	Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. It is considered that Trafford is sufficiently identified within the 'core growth area' as shown in figure 6.1. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No change is considered necessary.	Peel L&P Northern Investments
JP-J3.15	Need to ensure that HS2 and other strategic infrastructure is designed so that it supports the Davenport Green allocation	Further detail on HS2 and its relationship to PfE is set out within Chapter 2 'Context', page 29, paragraph 2.23, of the Plan. However, the delivery of	Royal London Asset Management

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		HS2 is not within the scope of the Plan as it is being dealt with at a national level.	
	3. Manchester Airport Enterprise Zone		
JP-J3.16	Respondent notes the emphasis on providing new office floorspace in the Manchester Airport Enterprise Zone which has the capacity to impact the SRN at the already congested M56 Corridor, particularly given that office developments have the potential to generate a high number of vehicle trips. It should be noted that the policy does not make reference to the role of the SRN.	All sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. No change is considered necessary.	National Highways
JP-J3.17	Supports the range of priorities identified within Policy JP-J3. However, it is requested that a more specific reference is made to Wythenshawe Hospital to ensure future planned healthcare-related commercial office development can directly contribute towards the new office floorspace to be delivered over the plan period. Request the following text is included within the policy: “Manchester Airport Enterprise Zone and its environs (including Wythenshawe Hospital Campus), taking advantage of the extensive international connections, public transport accessibility, and proposed HS2 and Norther Powerhouse Rail links.	Policy JP-Strat 10 ‘Manchester Airport’ (criterion 2) explicitly mentions Wythenshawe Hospital in the context of its connectivity and research strengths. As such, no change is considered necessary.	Manchester University Hospitals NHS Foundation Trust
	4. Town Centres		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP-J3.18	It is important to ensure that the Plan is flexible and justified and would suggest that the wording of policy JP-J3 be amended to ensure that the use of article 4 directions is not unreasonably imposed and that the local plans does provide sufficient flexibility to allow residential uses within town centres where appropriate and justified. Otherwise, there is a risk that such an approach could limit development opportunities and simply result in new buildings remaining vacant and under-used in the future.	The policy states that “individual districts through Local Plans or other mechanism(s) may restrict the changes of use of existing office space to non-employment uses such as housing where this could compromise the continued supply of a diverse range of office floorspace”. It is considered that the policy provides flexibility allowing local authorities to take any decisions on the undertaking of Article 4 Directions as appropriate based on local circumstances. In any case, permitted development right’s exist allowing some changes of use in permitted areas. As such, no change is considered necessary.	See Appendix
	No comments provided		
JP-J3.19	Plan is unsound – no specific comments provided.	It is considered that the plan is sound and that an appropriate evidence base has been developed in order to support policy JP-J2.	See Appendix

PfE 2021 Policy JP-J4, Industrial and Warehousing Development

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General/ plan-wide		
JP-J4.1	It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before “Places for Everyone” can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write.	As stated at paragraph 1.22 of the Places for Everyone Plan, the impact of the five different changes between the GMSF2020 and the PfE2021, together with that of their cumulative impact was considered and it was determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020. In this context, it is important to note that, “substantially the same effect” does not mean “the same effect”. It allows for flexibility to address the fact that the plan now covers a different geographical area, with consequently different levels of needs and resulting changes to allocations. No change is considered necessary.	See Appendix
Policy JP-J4.2	Sections 20 to 23 relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Plan Review process. It is assumed that the Greater Manchester Combined Authority has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of this plan. The documentation is inconsistent, incoherent in parts and does not currently justify and support the Plan as drafted.	No change considered necessary. Comment not relevant to JP-J1, however the Plan has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 . and is supported by a proportionate evidence base [see supporting documents page]. Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan .	See Appendix
JP-J4.3	The Publication Plan has not had due regard to the provisions of the latest draft of the NPPF, and specifically Section 13, Paragraph 141 and the strategy to be assessed in relation to justifying that exceptional circumstances exist to change Green Belt boundaries	It is considered that the Publication Plan is in line with NPPF. In relation to para 141, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		amend the Green Belt Boundary [07.01.25] . No change is considered necessary.	
JP-J4.4	PfE is silent on Minerals	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 Planning Association
JP-J4.5	The allocation at Chat Moss does not meet the requirements of NPPF Para 35	As part of the process of preparing the Plan one of the requirements is to demonstrate how the amount and spatial distribution of growth across the plan area has been chosen. This is set out in the Growth and Spatial Options Paper [02.01.10] which sets out how the options have evolved during plan preparation and the reasonable alternatives that have been considered. It is considered that the allocations presented in the plan are sound and that there is a strategic exceptional circumstances case to be made to release Green Belt for development. The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] . Furthermore, details in regards to the North of Irlam Station (Chat Moss) allocation, including site selection, is set out within the allocation topic paper [10.07.70] . No change is considered necessary.	See Appendix
JP-J4.6	Respondent believes this policy can be strengthened and made sound by including the following commitments: the provision of evidence to demonstrate that the release of green belt land for industrial and warehousing sites will not damage the rural economy; the provision of evidence to demonstrate that the release of green belt land will not impact GM's need to address the climate emergency; confirmation that this Policy will explicitly require brownfield land use to be prioritized; an assessment should be made to identify the number/size of potential sites arising from business uncertainties caused by Brexit, the pandemic and, also, as a consequence of the recent changes to the permitted development scheme;	Employment need and supply is discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01] ; Employment Land Needs in Greater Manchester [05.01.02] and Employment Topic Paper [05.01.04] . Supporting evidence document Covid-19 and PfE Growth Options [05.01.03] and the Employment Topic Paper [pages 19-21] considers the impact of the pandemic on employment need/ supply. The impact of Brexit is considered within the Employment Topic Paper [pages 18-19 and 21-22].	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>a comprehensive review of Employment Land Supply should be undertaken (in collaboration with local residents and their representatives), including reference to the assessment mentioned above and consideration should be given to the margin that should be applied; the review should consider whether any of the over-supply of office space can be utilised for other purposes, including industrial and warehousing, particularly where the land is already in a sustainable location (opportunities should also be taken to consider techniques such as multistorey warehousing to reduce land-take); any proposals to release green belt for industrial and warehousing space within the Plan should be removed; the KPIs need to be updated to ensure they measure all aspects of this Policy.</p>	<p>The PfE sets out a very clear preference for using previously developed (brownfield) land and vacant buildings to meet development needs. Other than in relation to the site selection process for identifying the strategic allocation, there is not a sequentially preferable priority. Instead, a preference for using brownfield land ensures that an efficient use can be made of the land supply and to keep the release of greenfield and Green Belt land to a minimum.</p> <p>Given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. See Growth and Spatial Options Paper: 02.01.10 for further information.</p> <p>In relation to the KPIs, 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.</p>	
	Land Supply/ Need/ Demand		
JP-J4.7	<p>The GMSF fails to acknowledge that the overall requirement for industrial space has declined across Greater Manchester over the last 15 years and is likely to continue to do so (meaning vacant floorspace will become available through windfall sites). The industry and warehousing floorspace requirement is over inflated; there are too many inflated upward adjustment factors built into the calculation (i.e. adjustments to account for the recession, margins of uncertainty, and flexibility of choice).</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The approach is based on the evidence base prepared and as such is considered to be sound. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. An appropriate and proportionate evidence base has been provided to support the Plan, and no change is considered necessary.</p>	See Appendix
JP-J4.8	<p>The criteria for the policy are vague and contrary to the NPPF (Para 16). In order to make the policy sound the respondent requests that the policy</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment</p>	Aviva Life & Pensions UK

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>be amended so that it can enable greater flexibility in the context of a likely underestimation of need additional employment land, opportunities for industrial and warehouse uses that could be brought forward.</p>	<p>Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is considered that an appropriate supply of sites has been identified to meet future employment needs based on the evidence base provided - see Economic Forecasts for Greater Manchester [05.01.01] and Employment Land Needs in Greater Manchester [05.01.02].</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. No change is considered necessary.</p>	
JP-J4.9	<p>Respondent suggests that the wording of item 3 in this draft Policy is amended to refer to the broader range of key locations and strategic sites in the northern part of Greater Manchester</p>	<p>Criterion 3 of JP-J4 provides an example of one of the strategic allocations in the north of Greater Manchester. Chapter 11 'Allocations' provides the full list of all the strategic allocations within the plan. When the plan is read as a whole no change is considered necessary.</p>	Haworth Group plc
JP-J4.10	<p>The allocations were selected in accordance with the land requirements of the Greater Manchester Spatial Framework and carried over to PfE. However, PfE uses a different methodology to identify the employment land requirements, resulting in a significantly lower need. The allocation policies do not appear to have been updated to reflect the newer targets.</p> <p>The reduction in industrial land need has not been accompanied by a reduction in supply: a land supply of 3,960,389 sqm (which includes 2,154,880 sqm of allocations) equates to a 56% buffer in total. Earlier reports included in the GMSF documentation noted that a "supply margin of 50% falls well outside the bounds of what has been generally used elsewhere". Nicol Economics further notes that supply margins are "up to around 25% or at most 5 years of supply".</p> <p>PfE adopts a 31 percent margin in its two employment land supply policies, but in reality, the margin on the industrial and warehousing land supply is effectively 56 percent over the plan period, and 75 percent in total. It does not evidence or justify its policy margin, the surplus of land over the plan</p>	<p>The Employment Land Needs in Greater Manchester document [05.01.02], page 9-10] provides rationale for the applied margin. The Employment Topic Paper [05.01.04], page 18] states that "a margin of flexibility has been added to account for recent evidence of strong demand for Industrial and Warehousing space indicating demand may have been suppressed by a lack of supply; the inherent uncertainties in any forecasting exercise; and the aspiration to increase the overall size and competitiveness of the GM economy. This is set at 31% based on previous studies and external advice provided". Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The methodology applied to calculate employment needs has been prepared based on the evidence and is therefore fully justified.</p> <p>In relation to para 140, the PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of</p>	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>period (660,389 sqm of industry and warehousing land over the plan period), and the allocation of land beyond the lifespan of the plan (478,000 sqm of allocated land post-2037).</p> <p>PfE does not evidence and justify exceptional circumstances as per para.140 of NPPF.. PfE does not adequately justify the adoption of a 5-year margin over a 4-year margin in light of the analysis by Nicol Economics. The margin on the employment land supply needs to be reduced to 4 years and the revised target needs to be adopted by Policy JP-J 3 and Policy JP-J 4.</p>	<p>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. Given the lack of sufficient land to ensure that our overall housing and employment needs can be met, it is considered that there is a strategic exceptional circumstances case to be made to release Green Belt for development. However, this release has been kept to the minimum and has been done in locations which will help to meet our overall vision and objectives. The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25]. No change is considered necessary.</p>	
JP-J4.11	<p>Respondent states that PfE is in contravention of the Aireborough judgement in instances where the land requirement is a contributing factor to exceptional circumstances.</p>	<p>It is considered that the exceptional circumstances case set out in the Green Belt Topic Paper [07.01.25] is lawful and provides a proportionate evidence base to justify the approach. The set of circumstances presented in legal case of Aireborough vs Leeds is different to those in relation to PfE.”</p>	<p>Save Royton’s Green Belt Community Group</p>
JP-J4.12	<p>The assessment period has been shortened to start in 2021 and cover a 16-year period without justification, in particular when the supply baseline used is for 2020. Essentially one years’ worth of need has essentially been lost. This is not justified.</p>	<p>The plan period was correctly altered from 2020 to 2037 to 2021-2037 to reflect guidance that the housing and employment targets should use the year in which the plan was published under Regulation 19 as its base year [PPG ‘Housing and Economic Development Needs Assessments, 004 Reference ID: 2a-004-20201216]. However, given that the land supply supporting PfE 2021, uses 2020 as its base year, tables 6.1 and 6.2 include the relevant 2020/2021 land supply within the estimated completions column, therefore that land supply has not been removed, it has been accounted for based on the assumptions around annual delivery rates in the Plan. No change considered necessary.</p>	<p>Morland Capital Partners No1 Ltd</p>
JP-J4.13	<p>Respondent refers to a alternative completions forecasting model identifies a need for between 4.7m – 5.0m sq.m of industry and warehouse floorspace; and a labour demand model identifies a 5.1m – 5.7m sq.m of industry and warehouse floorspace.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. A 31% margin of flexibility has been added when calculating the employment land needs for</p>	<p>Morland Capital Partners No1 Ltd</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Respondent states that in order for the policy to be found sound, the evidence base is revisited and policy is amended accordingly with a higher requirement for employment floorspace	<p>offices and industry and warehousing, based on previous studies and external advice provided (see Employment Topic Paper [05.01.04], pages 17-18). Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the demand for employment land, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that JP-J2 provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF.</p> <p>As such, based on the evidence, it is considered that the sites identified, and the buffer will ensure employment needs can be met through the plan. No change is considered necessary.</p>	
JP-J4.14	The method for estimating future employment land needs is still largely based upon extrapolating forward past trends. Given the urgent need for systemic change to tackle the biodiversity and climate emergencies, we are not convinced that this approach is justified. We also note the statement in paragraph 6.36 that “The Green Belt sites have been selected in order to make the most of key assets and locations, with a focus on realising the potential of transport infrastructure such as the motorway network...etc.” This seems to confirm our concerns that the sites have been largely chosen due to their economic potential rather than environmental factors	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation. Where there are environmental constraints identified on strategic allocations, there are measures set out within the allocation policies to mitigate any impacts. Furthermore, policy JP-G 9 sets out measures to ensure biodiversity is protected through development. No change is considered necessary.</p>	The Wildlife Trust
	Strategy/ approach		
JP-J4.15	Respondent believes that the wording of the policy should be amended to read "The economic competitiveness of the southern areas of Greater	Covered elsewhere in the Plan. Policy JP-J4 (criterion 2) makes reference to “Making the most of the key locations identified in Policy JP-J 1” in order to deliver the 3,330,000sqm of industrial and warehousing floorspace.	Peel Land & Property

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Manchester will be protected and enhanced and the economic potential of industrial and warehousing investment at Manchester Airport and New Carrington will be maximised.” in order for the policy to be found sound.	Policy JP-J1 (criterion G,iv and figure 6.1) identifies the strategic location of Manchester Airport. New Carrington is covered by JP-Strat 9 ‘Southern Areas’ and JP-Strat 11 ‘New Carrington’ and Policy JP Allocation 33 ‘New Carrington’ which allocates the development site and provides more detailed requirements for its implementation. Policy JP-Strat 9 sets out that “the economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced”. No change is considered necessary.	
JP-J4.16	In order to be found sound, policy should be amended so that it reads "Policy JP-J 4 Industry and Warehousing Development At least 3,330,000 sq m of new, accessible, industrial and warehousing floor space will be provided in the Plan area over the period 2021-2037	Policy JP-P1 ‘Sustainable Places’ sets out measures for ensuring that development is socially inclusive (criterion 3), and easy to move around for those of all mobility levels (criterion 13). The plan should be read as a whole. Therefore, no change is considered necessary.	GM Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-J4.17	The policy doesn't reference the role of Strategic Road Network and the need for it to function effectively and safely.	Chapter 5 ‘Connected Places’ sets out the transport and connectivity policies for the plan. Paragraph ‘s 10.54 and 10.55 reference the Strategic Road Network (SRN). Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 [09.01.01] and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. When the plan is read as a whole no change is considered necessary.	National Highways
Policy JP-J4.18	Respondent believes that the policy is unsound and that the significant under provision of floorspace will be harmful to the future economy of	Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>Greater Manchester and will constrain fulfilment of many of the regeneration, sustainability and economic objectives of the plan.</p> <p>The employment allocations set out within the Places for Everyone Joint Plan fall significantly short of the quantum required across the region, resulting in a plan which is neither an effective strategy for delivering such floorspace, given the 'planning by appeal' implications of under allocation, or a positively prepared proposal.</p>	<p>considered to be a robust, widely accepted methodology. The employment land requirements (tables 6.1 and 6.2) are derived from the evidence base. It is considered that an appropriate supply of sites has been identified to meet this need. In addition, a 31% margin of flexibility has been added when calculating the employment land needs for offices and industry and warehousing, based on previous studies and external advice provided (see Employment Topic Paper [05.01.04], pages 17-18). Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the demand for employment land, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period.</p> <p>Therefore, together with the monitoring framework within the plan, it is considered that JP-J2 provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF.</p> <p>As such, based on the evidence, it is considered that the sites identified, and the buffer will ensure employment needs can be met through the plan. No change is considered necessary.</p>	
JP-J4.19	<p>Rochdale has the highest requirement for industry and warehouse land supply (table 6.2) in the SP, mainly in northern gateway and Stakehill, investment in new homes is to mirror the employment opportunities that arise. However, there looks to be a mismatch between the type of employment opportunities created (warehouse and distribution tend to be lower paid) rather than driving additional demand for higher value homes.</p>	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. The requirements set out within table 6.2 are derived from the evidence base. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04].</p> <p>The housing need has been calculated using the standard methodology as set out by NPPF - further information on the housing need methodology is provided in the Housing Topic Paper [06.01.03]. Overall, PfE identifies a range of new housing sites, in a variety of locations. The varied mix of sites, including affordable housing, supported by the necessary</p>	Greater Manchester Housing Providers (GMHP)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		infrastructure will provide the right level and mix of homes needed to support the economic growth. No change is considered necessary.	
JP-J4.20	<p>Based on Lichfields Employment Evidence Paper, the minimum industrial and warehousing floorspace requirement for the nine PfE authorities for the period 2021 to 2037 should be increased 3,762,000sq.m.</p> <p>It is considered that section (a) of Policy JP-J 4 should be amended from:</p> <p>a) Opportunities for manufacturing businesses, particularly advanced manufacturing.</p> <p>To:</p> <p>(a) opportunities for businesses in identified prime sectors, including manufacturing (general and advanced) and logistics.</p>	<p>The supporting text for the Industrial and Warehousing policy sets out that 'Industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors. It is particularly important to the key sectors of advanced manufacturing and logistics but it is also crucial to supporting other parts of the economy and its continued provision will help to reduce inequalities' [page 116, para. 6.26]. Further detail on key sectors is also provided in this supporting text, as such it is considered that the policy is sufficient when the policy chapter is read as a whole.No change is considered necessary.</p>	Russell LDP
	Site specific responses		
JP-J4.21	<p>Respondent believes that in order to be found sound the allocation at Simister/Northern Gateway should be removed.</p>	<p>The size and location of the allocations have been determined through a robust site selection process and the evidence base, which demonstrates what the level of employment space required is in the Greater Manchester area. It is considered that an appropriate supply of sites has been identified based on the need set out within the Employment Land Needs in Greater Manchester paper [05.01.02]. The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04]. Furthermore the allocation topic paper [10.07.71] sets out further detail in relation to the sites' selection and proposed development Further information can be found in the Topic Paper for Simister / Northern Gateway regarding the site selection process [10.01.1.2]. No change is considered necessary.</p>	See Appendix
JP-J4.22	<p>Respondent believes that in order to be found sound, policy needs to be amended to allow for a larger allocation at Port Salford</p>	<p>The size and location of the allocations have been determined through a robust site selection process and the evidence base, which demonstrates what the level of employment space required is in the Greater Manchester area. It is considered that an appropriate supply of sites has been identified</p>	Peel L&P Investments – North

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		based on the need set out within the Employment Land Needs in Greater Manchester paper [05.01.02] . The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] . Furthermore the allocation topic paper [10.07.71] sets out further detail in relation to the sites' selection and proposed development. Further information regarding the site allocation process for Port Salford and its size can be found in the Site Allocation Topic Paper [10.07.29] . No change is considered necessary.	
JP-J4.23	Respondent believes that Port Salford allocation is too large and does not meet the requirements shown in Homes England guide to development of 77sqm per one job created.	The size and location of the allocations have been determined through a robust site selection process and the evidence base, which demonstrates what the level of employment space required is in the Greater Manchester area. It is considered that an appropriate supply of sites has been identified based on the need set out within the Employment Land Needs in Greater Manchester paper [05.01.02] . The full methodology for calculating employment need is contained within the Employment Topic Paper [05.01.04] . Furthermore the allocation topic paper [10.07.71] sets out further detail in relation to the sites' selection and proposed development. Further information regarding the site allocation process for Port Salford and its size can be found in the Site Allocation Topic Paper [10.07.29] . No change is considered necessary.	Campaign to Protect Rural England (CPRE)
JP-J4.24	Respondent considers that in order to be found sound, the site at Latham Lane, Wigan, needs to be allocated as part of the plan	Omitted sites are considered within the Wigan Omission Document.	See Appendix
JP-J4.25	Supports the allocation at Stakehill and states their support for policy JP-J4 as they complement each other.	Support welcomed.	The Milne Trust
	No comments provided		
JP-J4.26	Plan is unsound – no specific comments provided.	It is considered that the plan is sound and that an appropriate evidence base has been developed in order to support policy JP-J2.	See Appendix

Appendix

Respondents to PfE 2021 Policy JP-J1 – Supporting Long-Term Economic Growth

Table 1. Row JP-J1.2

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Matthew	Oxley	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Lucy	Marsden	NA

Table 2. Row JP-J1.3

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Matthew	Oxley	NA
C	Smith	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barabara	Wilkinson	NA
Lucy	Marsden	NA

Table 3. Row JP-J1.4

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Matthew	Oxley	NA
C	Smith	NA
Clare	Bowdler	NA
Christopher	Russell	NA

Given Name	Family Name	On behalf of company/organisation or individual
Barabara	Wilkinson	NA
Lucy	Marsden	NA
Stephen	Cluer	NA

Table 4. Row JP-J1.9

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Trevor	Widdop	NA
		Save Royton's Greenbelt Community Group
Lynn	Clegg	NA
Ian	Hayes	NA
Janet	Taylor	NA
Roy	Chapman	NA
Tracy	Owen	NA
Julie	Halliwell	NA
John	Edington	NA
Janine	Lawford	NA
Jamie	Bentham	NA
Paul	Cross	NA
Jeremy	Williams	NA
Vicky	Harper	NA
Steven	Higginbottom	NA
		Harworth Group Plc.
Mark H	Burton	NA
		The Wildlife Trusts
Peter and Diane	Martin	NA
David	McLaughlin	NA
Maureen	Buttle	NA
		Save Royton's Greenbelt Community Group

Given Name	Family Name	On behalf of company/organisation or individual
Nigel	Morrell	NA
Paul	Roebuck	NA
Gillian	Boyle	NA

Table 5. Row JP-J1.10

Given Name	Family Name	On behalf of company/organisation or individual
Collette	Gammond	NA
Peter	Stratton	NA
		Friends of Carrington Moss
Ian	Hayes	NA
Janet	Taylor	NA
Chris	Green	NA
Julie	Halliwell	NA
Joanne	Maffia	NA
Janine	Lawford	NA
Jamie	Bentham	NA
Paul	Cross	NA
Brian	Saffer	NA
Jane	Barker	NA
Vicky	Harper	NA
		The Wildlife Trusts
Tracy	Raftery	
David	McLaughlin	NA
Maureen	Buttle	NA
		Save Royton's Greenbelt Community Group
Nigel	Morrell	NA
Paul	Roebuck	NA
Gillian	Boyle	NA

Table 6. Row JP-J1.13

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Cross	NA
Grace	Farrell	NA
		The Wildlife Trusts

Table 7. Row JP-J1.14

Given Name	Family Name	On behalf of company/organisation or individual
Peter and Diane	Martin	NA
Laura	Charlotte	NA
Grace	Farrell	NA

Table 8. Row JP-J1.15

Given Name	Family Name	On behalf of company/organisation or individual
Chris	Green	NA
Grace	Farrell	NA

Table 9. Row JP-J1.17

Given Name	Family Name	On behalf of company/organisation or individual
Thomas Michael	Norris	
Brian	Hulme	
		Harworth Group Plc.

Table 10. Row JP-J1.18

Given Name	Family Name	On behalf of company/organisation or individual
Peter and Diane	Martin	NA
		Harworth Group Plc.

Table 11. Row JP-J1.19

Given Name	Family Name	On behalf of company/organisation or individual
		Barratt Manchester Limited
		Harworth Group Plc.
		NPL Group
		LQ Estates and Trafford HT

Table 12. Row JP-J1.21

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Christine	NA
John	Smith	NA
Colin	Walters	NA
		Highgrove Strategic Land Ltd
		Rowland Homes Ltd
		Barratt Manchester Limited
		LQ Estates and Trafford HT
		PD Northern Steels
Peter and Diane	Martin	NA
Michelle	Carno	NA
Helen	Lomax	NA
Brian	Hulme	NA
Kim	Scragg	NA
Ian	Hayes	NA
Colin	Walters	NA

Table 13. Row JP-J1.23

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Cross	NA
Brian	Saffer	NA
Grace	Farrell	NA
Colin	Walters	NA

Table 14. Row JP-J1.27

Given Name	Family Name	On behalf of company/organisation or individual
		Woodford Neighbourhood Forum
		Campaign to Protect Rural England (CPRE)
		Friends of Carrington Moss

Table 15. Row JP-J1.30

Given Name	Family Name	On behalf of company/organisation or individual
E	Bowles	NA
Kim	Scragg	NA

Table 16. Row JP-J1.35

Given Name	Family Name	On behalf of company/organisation or individual
		Peel L&P Investments (North) Ltd
		Peel Land and Property

Table 17. Row JP-J1.46

Given Name	Family Name	On behalf of company/organisation or individual
Brian	Hulme	NA
Laura	Charlotte	NA
Mary	Sharkey	NA
Anne	Isherwood	NA
Lynn	Clegg	NA
Mark H	Burton	NA
		Friends of Carrington Moss

Table 18. Row JP-J1.48

Given Name	Family Name	On behalf of company/organisation or individual
		The Connell Group
D	Vick	NA
		The Milne Trust

Table 19. Row JP-J1.49

Given Name	Family Name	On behalf of company/organisation or individual
		The Connell Group
D	Vick	NA

Table 20. Row JP-J1.50

Given Name	Family Name	On behalf of company/organisation or individual
D	Vick	NA
Andy	Collins	NA
		Royal London Asset Management RLAM

Given Name	Family Name	On behalf of company/organisation or individual
		Northern Gateway Development Vehicle LLP
		Middleton SC Limited (Owners of the Middleton Shopping Centre, Middleton)
		RedleafVI (Ashton) Limited Partnership and Ellandi
		Murphy Group
		Peel Land and Property
		Casey Group
		Shepherd Group
		Russell LDP
		Greater Manchester Housing Providers

Table 21 Row JP-J1.51

Given Name	Family Name	On behalf of company/organisation or individual
Carl	Simms	
Lynn	Clegg	
Margaret	Fulham	
Jonathan	Wigman	
Michael	Hullock	
Alan	Shepherd	
L J	Park	
Janet	Howarth	
Kim	Scragg	
Heather	Williams	
Janet	Franks	

Given Name	Family Name	On behalf of company/organisation or individual
Jamie	Bentham	
Mary	Sharkey	
Olivia	Allen	
Lindsay	Connolly	
Carol	Mole	
Simon	Robertson	
Rob	Shield	
Julie	Mills	
R	Nawaz	
Linda	Booth	
Peter	Stanyer	
Trevor	Thomas	
Janet	Alred	

Respondents to PfE 2021 Policy JP-J2 – Employment Sites and Premises

Table 1. Row JP-J2.1

Given Name	Family Name	On behalf of company/organisation or individual
Maika	Fleischer	NA
Daniel	Lawson	NA
Brian	Saffer	NA
C	Smith	NA
Tracy	Rafferty	NA
David	McLaughlin	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Crimble Mill Greenbelt Group

Table 2. Row JP-J2.2

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Brian	Saffer	NA
C	Smith	NA
Tracy	Rafferty	NA
David	McLaughlin	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Crimble Mill Greenbelt Group

Table 3. Row JP-J2.3

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
Brian	Saffer	NA
C	Smith	NA
Tracy	Raftery	NA
David	McLaughlin	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Crimble Mill Greenbelt Group

Table 4. Row JP-J2.8

Given Name	Family Name	On behalf of company/organisation or individual
Kim	Scragg	NA
Margaret	Fulham	NA
John	Edington	NA

Table 5. Row JP-J2.11

Given Name	Family Name	On behalf of company/organisation or individual
Lisa	Mather	NA
Peter	Mather	NA
Deborah	Morgan	NA
Andrea	Keeble	NA
Susan	Higgins	NA
Oscar	Majid	NA
Stuart	Johnstone	NA

Given Name	Family Name	On behalf of company/organisation or individual
Susan	Fleming	NA
Juliet	Eastham	NA
Yvonne	Robinson	NA
Catherine	Schofield	NA
Andrew	Fleming	NA
Michelle	McLoughlin	NA
Joan	Glynn	NA
Tom	Wood	NA
Viv	Barlow	NA
Jacqueline	Majid	NA
S	Stratton	NA
Colin	Heaton	NA
Hazel	Keane	NA
John	Robinson	NA
Susan	Horrige	NA
Shirley	Buckley	NA
Barry	Spence	NA
Joanne	Dawson	NA
George	Wood	NA
Joanne	Culliney	NA
Annemarie	Bennett	NA
Christopher	Culliney	NA
Rebecca	Robinson	NA
Alexandra	Saffer	NA
Daniel	Robinson	NA
Derek M	Glynn	NA
Carole	Martin	NA
Geoff	Woods	NA
Carolyn	Saffer	NA
Samantha	Doggett	NA

Given Name	Family Name	On behalf of company/organisation or individual
Lucy	Taylor	NA
Saul	Bennett	NA
Colleen	Donovan-Togo	NA
Angela	Shaw	NA
Paul	Taylor	NA
Aimee	Shaw	NA
Jennifer	Cronin	NA
Barabara	Cooke	NA
Lorraine	Tucker	NA
Shelia	Jackson	NA
Brian	Wright	NA
Brian	Cooke	NA
Kelly	Fox	NA
Paul	Yarwood	NA
Lisa	Wright	NA
Victoria	Hothersall	NA
Adam	Burgess	NA
Jacqueline	Yarwood	NA
Sara	Slater	NA
Abby	Derere	NA
Craig	Tucker	NA
Anna Katherine	Burgess	NA
Alan	Bayfield	NA
Debbie	Pownceby	NA
Rebecca	Hindle	NA
Marjorie	Higham	NA
Gwynneth	Manus	NA
Gwyneth	Derere	NA
Nicola	Kerr	NA
Julia	Gallagher	NA

Given Name	Family Name	On behalf of company/organisation or individual
Andy	Skelly	NA
Joanne	Dallimore	NA
Alison	Lees	NA
David J	Arnfield	NA
Emma	Nye	NA
Kath	Dobson	NA
Jackie	Harris	NA
Jane	Bennett	NA
Carl	Mason	NA
Leanne	Labrow	NA
Suzanne	Nye	NA
Alex	Abbey	NA
Caroline	O'Donnell	NA
Mary	Walsh	NA
G R	Walsh	NA
Pamela	Maxon	NA
Alexandra	Cluer	NA
Dawn	Johnstone	NA
		Morland Capita Partners No1 Ltd
Graham	Walsh	NA

Table 6. Row JP-J2.14

Given Name	Family Name	On behalf of company/organisation or individual
Trevor	Widdop	NA
Louise	Bolotin	NA
Margaret	Fulham	NA
Julie	Halliwell	NA
Gillian	Boyle	NA

		Mineral Products Association
Maureen	Buttle	NA
Mark	Haynes	NA
		Save Greater Manchester's Green Belt (SGMGB)
Jacqueline	Charnock	NA
Roy	Chapman	NA
Tracy	Raftery	NA

Table 7. Row JP-J2.15

Given Name	Family Name	On behalf of company/organisation or individual
		Morland Capital Partners No1 Ltd
Anne	Isherwood	NA

Table 8. Row JP-J2.16

Given Name	Family Name	On behalf of company/organisation or individual
Stephen	Cluer	NA
Julie	Halliwell	NA

Table 9. Row JP-J2.17

Given Name	Family Name	On behalf of company/organisation or individual
		Gladman Developments
		NPL Group
		Royal London Asset Management RLAM

Table 10. Row JP-J2.22

Given Name	Family Name	On behalf of company/organisation or individual
Chris	Green	NA
Glenn	Dillon	NA
John	Edgington	NA
		Friends of Carrington Moss

Table 11. Row JP-J2.29

Given Name	Family Name	On behalf of company/organisation or individual
Jane	Barker	NA
Steven	Higginbottom	NA
		Save Greater Manchester's Green Belt (SGMGB)

Table 12. Row JP-J2.30

Given Name	Family Name	On behalf of company/organisation or individual
		The Connell Group
		Save Royton's Greenbelt Community Group
		Save Greater Manchester's Green Belt (SGMGB)

Table 13. Row JP-J2.35

Given Name	Family Name	On behalf of company/organisation or individual
Lisa	Mather	NA
Peter	Mather	NA
Deborah	Morgan	NA
Andrea	Keeble	NA
Susan	Higgins	NA

Given Name	Family Name	On behalf of company/organisation or individual
Oscar	Majid	NA
Stuart	Johnstone	NA
Susan	Fleming	NA
Juliet	Eastham	NA
Yvonne	Robinson	NA
Catherine	Schofield	NA
Andrew	Fleming	NA
Michelle	McLoughlin	NA
Joan	Glynn	NA
Tom	Wood	NA
Viv	Barlow	NA
Jacqueline	Majid	NA
S	Stratton	NA
Colin	Heaton	NA
Hazel	Keane	NA
John	Robinson	NA
Susan	HorrIDGE	NA
Shirley	Buckley	NA
Barry	Spence	NA
Joanne	Dawson	NA
George	Wood	NA
Joanne	Culliney	NA
Annemarie	Bennett	NA
Christopher	Culliney	NA
Rebecca	Robinson	NA
Alexandra	Saffer	NA
Daniel	Robinson	NA
Derek M	Glynn	NA
Carole	Martin	NA
Geoff	Woods	NA

Given Name	Family Name	On behalf of company/organisation or individual
Carolyn	Saffer	NA
Samantha	Doggett	NA
Lucy	Taylor	NA
Saul	Bennett	NA
Colleen	Donovan-Togo	NA
Angela	Shaw	NA
Paul	Taylor	NA
Aimee	Shaw	NA
Jennifer	Cronin	NA
Barabara	Cooke	NA
Lorraine	Tucker	NA
Shelia	Jackson	NA
Brian	Wright	NA
Brian	Cooke	NA
Kelly	Fox	NA
Paul	Yarwood	NA
Lisa	Wright	NA
Victoria	Hothersall	NA
Adam	Burgess	NA
Jacqueline	Yarwood	NA
Anna Katherine	Burgess	NA
Alan	Bayfield	NA
Debbie	Pownceby	NA
Rebecca	Hindle	NA
Marjorie	Higham	NA
Gwynneth	Manus	NA
Gwynneth	Derere	NA
Nicola	Kerr	NA
Julia	Gallagher	NA
Andy	Skelly	NA

Given Name	Family Name	On behalf of company/organisation or individual
Joanne	Dallimore	NA
Alison	Lees	NA
David J	Arnfield	NA
Emma	Nye	NA
Kath	Dobson	NA
Jackie	Harris	NA
Jane	Bennett	NA
Carl	Mason	NA
Leanne	Labrow	NA
Suzanne	Nye	NA
Alex	Abbey	NA
Caroline	O'Donnell	NA
Mary	Walsh	NA
G R	Walsh	NA
Pamela	Maxon	NA
Alexandra	Cluer	NA
Dawn	Johnstone	NA
Graham	Walsh	NA
Maika	Fleischer	NA
Alan	Sheppard	NA
Janet	Taylor	NA
Paul	Cross	NA

Table 14. Row JP-J2.36

Given Name	Family Name	On behalf of company/organisation or individual
		Friends of Carrington Moss
Janine	Lawford	NA
		Save Greater Manchester's Green Belt (SGMGB)

Laura	Charlotte	NA
Mark	Haynes	NA

Table 15. Row JP-J2.37

Given Name	Family Name	On behalf of company/organisation or individual
Julie	Halliwell	NA
Paul	Cross	NA
Steven	Higginbottom	NA
John	Edgington	NA

Table 16. Row JP-J2.38

Given Name	Family Name	On behalf of company/organisation or individual
Lynn	Clegg	NA
Glenn	Dillon	NA
Laura	Charlotte	NA

Table 17. Row JP-J2.44

Given Name	Family Name	On behalf of company/organisation or individual
		Morland Capital Partners No1 Ltd
		Peel Land and Property

Table 18. Row JP-J2.45

Given Name	Family Name	On behalf of company/organisation or individual
		The Connell Group
		Persimmon Homes North West
		Northern Gateway Development Vehicle LLP

Table 19 JP-J2.46

Given Name	Family Name	On behalf of company/organisation or individual
Carl	Simms	
Helen	Lomax	
Peter	Christie	
Margaret	Fulham	
Jonathan	Wigman	
L J	Park	
Janet	Howarth	
Heather	Williams	
Janet	Franks	
		Wolstenholme Fold Farm
Mary	Sharkey	
Olivia	Allen	
Lindsay	Connolly	
Carol	Mole	
Simon	Robertson	
Rob	Shield	
Julie	Mills	
R	Nawaz	
Linda	Booth	
Peter	Stanyer	
Mike	Seer	
Trevor	Thomas	
Janet	Allred	

Respondents to PfE 2021 Policy JP-J3 – Office Development

Table 1. Row JP-J3.1

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Table 2. Row JP-J3.2

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Table 3. Row JP-J3.3

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Table 4. Row JP-J3.6

Given Name	Family Name	On behalf of company/organisation or individual
Carol	Easey	NA
Peter	Stratton	NA
John	Smith	NA
Paul	Roebuck	NA
Janine	Lawford	NA
Laura	Charlotte	NA
		Warburton Parish Council
Maureen	Buttle	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Table 5. Row JP-J3.13

Given Name	Family Name	On behalf of company/organisation or individual
		Campaign to Protect Rural England (CPRE)
Mark H	Burton	NA
Jeremy	Williams	NA

Table 6. Row JP-J3.18

Given Name	Family Name	On behalf of company/organisation or individual
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Greater Manchester Green Belt (SGMGB)
Stephen	Cluer	NA

Table 7. Row JP-J3.19

Given Name	Family Name	On behalf of company/organisation or individual
Carl	Simms	
Lynn	Clegg	
Jonathan	Wigman	
L J	Park	
Janet	Howarth	
Janet	Franks	
		Wolstenholme Fold Farm
Mary	Sharkey	
Julie	Mills	
Olivia	Allen	
Lindsay	Connolly	
Carol	Mole	

Given Name	Family Name	On behalf of company/organisation or individual
Simon	Robertson	
Rob	Shield	
R	Nawaz	
Kristian	Slater-Lett	
Peter	Stanyer	
Mike	Seer	
Trevor	Thomas	

Respondents to PfE 2021 Policy JP-J4 – Industry and Warehousing Development

Table 1. Row JP-J4.1

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Greater Manchester Green Belt (SGMGB)
Edward	Beckham	NA

Table 2. Row JP-J4.2

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester Green Belt (SGMGB)
Edward	Beckham	NA

Table 3. Row JP-J4.3

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	NA
C	Smith	NA
Patricia	Hay	NA
Chris	Green	NA
Stephen	Cluer	NA
Clare	Bowdler	NA
Christopher	Russell	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA
		Save Greater Manchester Green Belt (SGMGB)
Edward	Beckham	NA

Table 4. Row JP-J4.5

Given Name	Family Name	On behalf of company/organisation or individual
Jamie	Bentham	NA
David	McLaughlin	NA

Table 5. Row JP-J4.7

Given Name	Family Name	On behalf of company/organisation or individual
Carole	Easey	NA
Daniel	Lawson	NA
Janet	Taylor	NA
Peter	Stratton	NA
Trevor	Widdop	NA
Frances	Davidson	NA
Collette	Gammond	NA
		Save Royton's Green Belt Community Group

Table 6. Row JP-4.10

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester Green Belt
		Save Royton's Green Belt Community Group

Table 6. Row JP-J4.18

Given Name	Family Name	On behalf of company/organisation or individual
		NPL Group
Martin	Arthur	NA

Table 7. Row JP-J4.21

Given Name	Family Name	On behalf of company/organisation or individual
Stephen	Cluer	NA
Barbara	Wilkinson	NA
Lucy	Marsden	NA
Juliet	Eastham	NA

Table 8. Row JP-J4.24

Given Name	Family Name	On behalf of company/organisation or individual
		Harworth Group plc
Martin	Arthur	NA

Table 9. Row JP-J4.26

Given Name	Family Name	On behalf of company/organisation or individual
Carl	Simms	
Lynn	Clegg	
Jonathan	Wigman	
L J	Park	
Janet	Howarth	
Janet	Franks	
		Wolstenholme Fold Farm
Mary	Sharkey	
Julie	Mills	
Olivia	Allen	
Lindsay	Connolly	
Carol	Mole	
Simon	Robertson	
Rob	Shield	
R	Nawaz	
Kristian	Slater-Lett	
Peter	Stanyer	
Mike	Seer	
Trevor	Thomas	
Janet	Allred	