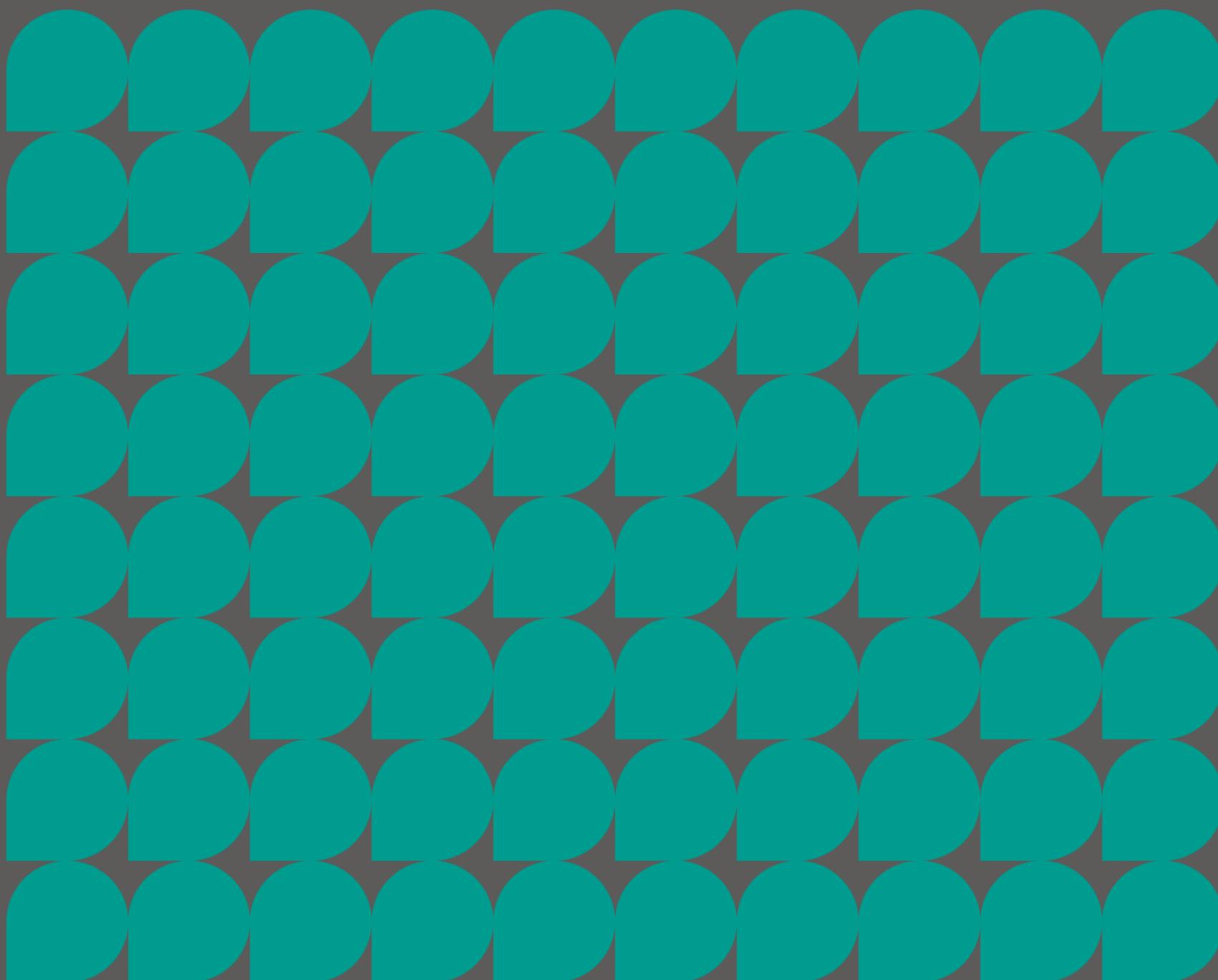


Places for Everyone

Greener Places Issues Summary

February 2022



Chapter 8 – Greener Places

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 8 – Greener Places and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JP-G1 – Valuing Important Landscapes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G1.1	Policy should include reference to historic designated landscapes alongside archaeology and cultural heritage (bullet point 4).	Policy JP-P2 (Heritage) covers the conservation and enhancement of the historic environment, heritage assets and their settings. Policy JP-P2 is considered to be in accordance with the NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF. Therefore, no change is considered necessary.	Lancashire Gardens Trust
Policy JP-G1.2	Policy should include reference to visual and landscape buffers for northwest or northeast areas	In identifying landscape character types (LCT's) across the region, the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA) [07.01.06] identifies that in some cases they provide an important sense of separation and naturalistic buffers between distinct settlements and urban areas (e.g. mosslands and lowland farmland and urban fringe farmland). Additional reference within the policy text is not therefore considered necessary.	Faith Crompton
Policy JP-G1.3	Policy is too ambiguous and should explain why these areas have been identified.	The supporting text to the policy (Paragraph 8.3 of the Plan) sets out that the GMLCSA [07.01.06] has assessed the quality and sensitivity of different landscapes within the region, which has informed the identification of the LCT's. As set out in paragraphs 1.7 – 1.12 of the GMLCSA, this is in accordance with national (NPPF) policy in order to set policies against which proposals for any development on or affecting the landscape will be judged; ensuring that development sufficiently reflects and responds to any special qualities and sensitivities of the key landscape characteristics of its location (see paragraph 1 of policy).	Linus Mortlock
Policy JP-G1.4	Policy should identify areas of high value / those which are too attractive which should be protected from development.	Figure 8.1 of the Plan shows the LCT's identified in the supporting GMLCSA [07.01.06] . The GMLCSA goes on to identify the sensitivity of these landscapes to particular development scenarios and sets out guidance which must be followed, particularly where a landscape is considered to be highly sensitive to development / is considered of high value.	Anne McNally

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G1.5	The protection of Conservation Area landscapes is also of importance and should be referenced.	The GMLCSA [07.01.06] identifies where Conservation Areas fall within LCT's and sets out that new development should assess the character and historic qualities of these designations. Policy JP-P2 (Heritage) also covers the protection of Conservation Areas. Additional reference within the policy text is not therefore considered necessary.	Falmai Youngman
Policy JP-G1.6	Policy should include a wider definition of value including the value of that land in the context of the surrounding community.	The value and sensitivity of each LCT is assessed in full in the supporting GMLCSA [07.01.06] using a wide range of criteria, including criteria that seek to identify the value of the land in the context of the surrounding community (e.g. setting of existing settlement / development, views, access and recreation and perceptual and experiential qualities). Table 3.2 (Landscape Sensitivity Assessment criteria and definitions) of the GMLCSA sets out the considerations of each criterion.	Gillian Boyle
Policy JP-G1.7	Policy provides a very broad-brush Landscape Character Assessment and should be supplemented by more local LCA's (e.g. parish level).	The policy seeks to identify LCT's at a strategic city-region level, assessing Greater Manchester's predominantly unbuilt areas whilst also considering cross-boundary relationships (see paragraphs 8.3 & 8.4 of the Plan). Development will also be required to comply with any landscape policies contained within district local plans which will provide an assessment of landscape at a more local level (where applicable).	Edward Beckmann
Policy JP-G1.8	Additional criteria should be added to the policy covering: Landscapes that support important wildlife populations & functional connectivity of landscapes in relation to ecosystems and ecosystem services.	The methodology for selecting the criteria used to assess each LCT is set out in Section 3 of the GMLCSA [07.01.06]. Paragraph 2 of the policy also references that opportunities to improve the intactness and condition of the landscape should be taken, especially in conjunction with seeking a net enhancement of biodiversity / geodiversity resources. The protection, management and enhancement of our Green Infrastructure in order to protect and enhance ecosystem services is covered by policy JP-G2 (Green Infrastructure) as well as policy JP-G9 which covers the enhancement of biodiversity / geodiversity in the city-region.	The Wildlife Trust
Policy JP-G1.9	Development should conserve and enhance the special qualities of landscapes and not just reflect and respond to them (this approach would follow the wording used in the statute for National Parks and AONBs).	The conservation and enhancement of certain protected landscapes such as the historic environment, heritage assets and their landscape settings is covered by policy JP-P2 (Heritage). The GMLCSA [07.01.06] also provides guidance and identifies opportunities (within the guidance and opportunities sections of each landscape character area assessment) where features of the identified landscapes should be conserved and enhanced. Additional reference within the policy text is not therefore considered necessary.	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G1.10	The opening sentence of the policy should be amended to read: Development should protect, enhance and manage reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location, including having regard to...	Please see response to row Policy JP-G1.9.	Historic England
Policy JP-G1.11	The value of landscape character assessment is not applied appropriately within the policy. Stopping at the urban edge fails to recognise that urban development, particularly more recent development which tends to be peripheral to the urban area, overlays the historic landscape. Therefore, new development can serve to respond to the historical undeveloped character if properly understood and recognised. The landscape in around the towns within the Pennines differs significantly from that of the Lancashire Plain and should inform development proposals.	<p>The GMLCSA [07.01.06] sets out in full the value of the identified LCT's as shown in Figure 8.1 of the Plan. The study area is considered appropriate for a regional-scale landscape character assessment and the methodology for the definition of the study area (comprising areas included in the GM Green Belt Assessment [07.01.04] and other areas of open land included in previous district-scale landscape character assessments) is included at paragraph 3.3 of the GMLCSA.</p> <p>Policy JP-P2 (Heritage) covers the regions approach to the protection of the historic environment / landscape both within and outwith the urban area, including the requirement for new development to positively conserve, sustain and enhance historic environments and their settings. As set out in Policy JP-P2, Local Plans will be responsible for setting out key heritage considerations and will demonstrate a clear understanding of, inter alia, the heritage value of sites.</p>	Historic England
Policy JP-G1.12	Paragraph 2 of the policy should be amended to refer to 'securing measurable net gains for biodiversity resources' rather than 'seeking a net enhancement of biodiversity / geodiversity resources'.	Full detail on the Plan's approach and requirement to seek a net enhancement of biodiversity / geodiversity is covered by Policy JP-G9 (a net enhancement of biodiversity and geodiversity) including a requirement to achieve no less than 10% measurable net gain. Additional reference within this policy text is not therefore considered necessary.	The Wildlife Trust
	General Comments		
Policy JP-G1.13	Disagreement with the Integrated Assessment criteria rating in relation to IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England
Policy JP-G1.14	Natural England comments relating to strength of policy regarding development on peat and its management. Concerns implications are under-represented in policies.	Policy JP-S2 sets out the Plan's approach to carbon and energy including increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats. Policy JP-G9 also provides for the safeguarding, restoration and sustainable management of our most valuable soil resources to ensure the protection of peat-based soils.	Natural England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G1.15	Evidence supporting the policy is out of date due to Stockport's withdrawal from the Plan. Re-assessment of the comparative value of landscape should be made.	As set out in paragraph 1.12 of the Natural Environment Topic Paper [07.01.26] PfE is to be considered as, in effect, the same Plan as the GMSF albeit without one of the districts (Stockport). Whilst its content has changed over time through the iterative process of plan making, its purpose has not. The withdrawal of Stockport from the Plan does not have an effect on LCT's identified in other District's and the policy evidence base therefore remains robust.	Redrow Homes Trafford
Policy JP-G1.16	Support for the policy and the aim that development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location.	Noted and welcomed.	See Appendix.
Policy JP-G1.17	Landscape character has been ignored in the development of the economic strategy for Greater Manchester. The landscape should be given more weight.	Please see paragraph 8.2 of the Plan. The GMCA is committed to the Government's approach as set out in the 25YEP to deliver a better natural environment for people and wildlife and ensuring that it is accessible for everyone to connect to and benefit from. One of the main objectives of the Plan, Objective 8, relates to improving the quality of our natural environment and access to green spaces, including enhancing special landscapes.	Faith Crompton
Policy JP-G1.18	Landscape preservation and acknowledgment of the contribution landscape makes to Greater Manchester (as well as its constraints) could be better emphasised throughout the Plan, but especially in terms of context setting and strategic policies.	One of the main objectives of the Plan, Objective 8, relates to improving the quality of our natural environment and access to green spaces including enhancing special landscapes. As set out at paragraph 8.2, the Plan supports the important role of our natural assets by valuing the special qualities and key sensitivities of our landscapes. This issue is consider to be sufficiently covered throughout the Plan.	Friends of the Earth
Policy JP-G1.19	A review of the GMLCSA should be undertaken to ensure sufficient weight has been given to the sensitivity of our valued landscapes.	Please see response to row Policy JP-G1.11.	Friends of Carrington Moss
Policy JP-G1.20	Clearer links should be made between the policy and the NPPF.	The policy is in line with the National Planning Policy Framework (NPPF). Paragraphs 2.13 – 2.16 of the Natural Environment Topic Paper [07.01.26] cover NPPF policy on landscape character and further reference within the policy is not considered necessary.	Friends of Carrington Moss
Policy JP-G1.21	Evidence should be provided that shows how each allocation performs when measured against the guidance in the GMLCSA.	The policy requires developments / applicants to consider the GMLCSA [07.01.06] . All allocations have also been subject to an assessment against various planning constraints, including landscape, as part of the site selection process, as set out in paragraph 6.44 of the Site Selection Background Paper [03.04.01] .	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Other		
Policy JP-G1.22	Comments objecting to the loss of Green Belt land for development - disconnect with the theme of valuing important landscapes.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, 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 Appendix.
Policy JP-G1.23	All landscapes are important. Policy is an attempt to undermine the value of certain areas so that their release can be justified for unnecessary development.	The value of landscapes within the city-region has been appropriately and robustly identified through the GMLCSA [07.01.06] following a thorough and industry standard methodology. As per the response to row Policy JP-G1.21 above, the Plan recognises the importance of landscapes within this process and within its main Objectives (namely Objective 8) and all allocations have been subject to a site selection process.	Gillian Boyle

PfE 2021 Policy JP-G2 – Green Infrastructure Network

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G2.1	The importance of hedgerows in green infrastructure should be recognised and added to the policy - they provide a carbon sink, habitats and corridors for wildlife and are a key feature of our landscape. Hedgerow Regulations 1997/35 should be referenced.	The Green and Blue Infrastructure Study, as summarised in paragraphs 3.2 to 3.22 of the Natural Environment Topic Paper [07.01.26] , explains how the Green Infrastructure Opportunity Areas referred to in Policy JP-G2 have been selected. It is considered that this is a proportionate and justified evidence base to support the policy. Hedgerows do not form an opportunity area but are likely to be present in the opportunity areas that have been identified. Their protection is referenced in clause 4 of Policy JP-G4 Lowland Wetlands and Mosslands. The protection of hedgerows is also subject to separate regulations under the Hedgerows Regulations 1997. No changes to the policy are required.	Woodford Neighbourhood Forum Friends of the Earth CPRE
Policy JP-G2.2	Many GI assets are cross boundary in nature, including between authorities within Greater Manchester, as well as beyond the Greater Manchester boundaries. It is therefore important to acknowledge this and have a clear commitment to working together with all relevant partners regarding their protection and management, where appropriate.	The collaborative approach to the development of the evidence base, understanding cross boundary issues and policy development for PfE Greener Places chapter policies is acknowledged in the PfE Statement of Common Ground 6 (p44) [01.01.02] . Parts a – e of Policy JP-G2 also reference the cross-boundary connections for each part of the Green Infrastructure Network. No change to the policy is considered necessary.	St. Helens Council
Policy JP-G2.3	The policy should be underpinned by site specific assessments which demonstrate that the areas identified are worthy of specific protection, or that other requirements set out in the penultimate paragraph of the policy should be applied to any development "within and around" the identified network.	The Green and Blue Infrastructure Study, as summarised in paragraphs 3.2 to 3.22 of the Natural Environment Topic Paper [07.01.26] , explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected. It is considered that this is a proportionate and justified evidence base to support the policy	Emery Planning
Policy JP-G2.4	A priority for the Green Infrastructure Network (GIN) should be to look at deficiencies in the quality of biodiversity and access to nature and green, open space as the evidence base suggests has started (i.e. ANGST scoring). Natural England's Access Index is also a good guide and local plan policies should ensure	The points raised are adequately covered by Paragraph 8.8 of the supporting text to Policy JP-G2 which outlines the principles of a high quality green infrastructure network. No change to the policy is considered necessary.	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	deficiencies are addressed to parts of the GIN within their control. The policy should include reference to tree planting initiatives and bringing the countryside into the city.	Paragraph 8.17 refers to trees as vital elements of the green infrastructure network that permeate through the broad areas. Also, Policy JP-G7 Trees and Woodland deals with increasing tree planting. Therefore, no changes to the plan are considered necessary.	
Policy JP-G2.5	It should be recognised that the development of some existing areas of poorer quality greenspace in Greater Manchester can assist in unlocking the accessibility of the wider green infrastructure network.	Policy JP-G6 Urban Green Space seeks to protect and enhance existing urban green space in balance with other considerations, therefore no changes to the policy are required.	Casey Group
Policy JP-G2.6	Policy does not specify the contribution requirement and explain how Green Infrastructure will contribute to the Nature Recovery Network of Greater Manchester.	Chapter 12 of the PfE outlines how the Plan will be delivered, in particular, Paragraph 12.3 outlines the delivery mechanisms that are available to implement the plan policies. Furthermore, Paragraph 1.57 indicates that all policies in the plan are strategic and that district Local Plan can set out more detailed policies reflecting local circumstances. Therefore, no changes to the policy are considered necessary. Paragraphs 8.10 to 8.13 of the supporting text to Policy JP-G2 outline the relationship between green infrastructure and the development of a Nature Recovery Network of Greater Manchester.	Redrow Homes Trafford
Policy JP-G2.7	Subsequent local plans should have regard to green infrastructure provision and the requirements should be assessed on a site specific basis as opposed to generalisation across the whole of Greater Manchester.	District Local Plans will need to be supported by evidence base that is proportionate to content and requirements of the particular policies. No changes to the policy is considered necessary.	Redrow Homes Trafford
Policy JP-G2.8	There should be protection from a developer conveniently going bankrupt to avoid such long-term commitments as the provision of green infrastructure management.	No change considered necessary. The approach to securing the necessary mitigation / infrastructure required to support development within the PfE Plan area, outlined in Chapter 12 and other parts of the Plan including the site specific allocation policies, is considered to be consistent with national planning policy and guidance. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements	Peter Thompson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G2.9	Reference to the National Park should be included in the policy.	References to the Peak District National Park are included at paragraph 8.3 in relation to landscapes and paragraph 8.31 in relation to the Uplands. No changes to the policy are considered necessary as they do not relate to the soundness of the Plan.	Peak District National Park Authority
Policy JP-G2.10	We are concerned with the narrow approach taken within the policy in that it fails to recognise the value and importance of planned green spaces that are not natural and that there needs to be more reference relating to historical and cultural opportunities. We recommend the following sentence is added to the policy: "Alongside the natural landscape, planned green spaces including historic landscapes, parks and gardens including those registered for their historic interest and other elements of green infrastructure will be protected, enhanced and managed."	Planned greenspaces such as parks and gardens and those with a historic element to them form part of the urban greenspace element of the Green Infrastructure Network and as such are covered by Policy JP-G6 Urban Green and its supporting text, particularly Paragraph 8.40. Furthermore, Policy JP-P2 Heritage, seeks to conserve, sustain and enhance heritage assets and their settings. No changes to the policy are required.	Historic England
Policy JP-G2.11	We believe this policy can be strengthened and made sound by including the following commitments: Update the GI description to ensure GI is paramount, rather than development (eg Development should be compatible with extensive GI, in a way that maximises the size and spread of such GI, with a particular need to increase the quantity and quality of GI in the denser urban areas); Classify accessible GI differently to non-accessible GI A more explicit link to the key aims of the Government's 25 Year Environment Plan; Rewording of the final two paragraphs within the Policy itself (page 149) to ensure that development is not planned within, around or in close proximity to key GI assets;	The penultimate paragraph of Policy JP-G2 covers the first point. No change to the policy is considered necessary. The Green and Blue Infrastructure Study that is summarised in paragraphs 3.2 to 3.22 of The Natural Environment Topic Paper [07.01.26] explains how the Green Infrastructure Opportunity Areas referred to in the Policy JP-G2 have been selected. It is considered that this is a proportionate and justified evidence base to define the green infrastructure network. Therefore, it not considered necessary to make a distinction between accessible and non-accessible GI. Paragraph 8.1 states that the GMCA is committed to the approach in the 25 Year Environment Plan and therefore does not need to be repeated in Policy JP-G2. Rewording the final two paragraphs of the policy would not be consistent with the aims the policy.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>The provision of clear evidence showing how each Allocation performs when measured against the Policy, including how local and regional plans to tackle the climate emergency will be impacted by the Allocations, particularly the release of land designated as green belt;</p> <p>Withdrawal of any Allocation that is not aligned with this Policy;</p> <p>Update Table 3 (page 30) of the Natural Environment Topic Paper, to include Carrington Moss as a strategic opportunity area for green infrastructure enhancement; and</p> <p>The KPIs need to be updated to ensure they measure all aspects of this Policy.</p>	<p>The requirements of Policy JP-G2 should be read in conjunction with the policy requirements of the proposed PfE allocations, JP-S2, JP-S3, JP-S4, JP-S5 and JP-S7.</p> <p>The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.</p> <p>No change to the policy is considered necessary.</p>	
Policy JP-G2.12	<p>The policy should set out that GI covers both ecosystem / environmental services crucial for the quality of life but also for the conservation of habitats and wildlife and the enhancement of biodiversity.</p>	<p>Paragraph 8.6 outlines the multiple benefits of green infrastructure including enhanced biodiversity. No change to the policy is considered necessary.</p>	The Wildlife Trusts
Policy JP-G2.13	<p>The policy should include guidance on how GI should be designed for maximum benefits, for example by taking a strategic approach through the use of ecological network mapping to ensure the most sensitive areas do not conflict with GI that primarily provides an open space function.</p>	<p>Guidance on how green infrastructure should be designed would not be appropriate in this strategic policy and would be suited to Local Plans, SPDs or masterplans produced at the local level. No change to the policy is considered necessary.</p>	The Wildlife Trusts
Policy JP-G2.14	<p>The wording of the penultimate paragraph of the policy is unclear. We recommend the use of the word 'facilitate' rather than 'achieve' and 'appropriate sources' should be defined.</p>	<p>The word 'achieve' is an appropriate word that performs one of the objectives of the policy, that is to ensure that development on proposed PfE allocations is consistent with delivering green infrastructure improvements. No change to the policy is considered necessary.</p> <p>The word 'appropriate sources' is considered suitable in this strategic policy and Chapter 12 of the PfE outlines how the Plan, including Policy JP-G2, will be delivered. In</p>	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		particular, paragraph 12.3 outlines the delivery mechanisms that are available to implement the plan policies. Therefore defining 'appropriate sources' in the policy would be unnecessarily restrictive. No changes to the policy are required.	
Policy JP-G2.15	The proposed Nature Recovery Strategy for Greater Manchester should be referenced in the policy if relevant legislation is enacted before the Plan is adopted.	Paragraph 8.11 of the supporting text to Policy JP-G2 refers to the Greater Manchester Local Nature Recover Strategy. It is also referenced again in paragraph 8.15. The supporting text is a suitable place to refer to it. Therefore, no changes to the policy are required.	The Wildlife Trusts
	General Comments		
Policy JP-G2.16	Support for the policy.	Noted and welcomed.	See Appendix.
Policy JP-G2.17	It is more time consuming and environmentally detrimental to move or recreate green space than it is to protect and enhance existing spaces. The impact on the wellbeing of local people and the permanent loss of wildlife species when habitats are destroyed must also be considered when proposing to replace existing green space with new areas.	Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity safeguards against the loss of wildlife habitats.	Climate Action Bury
Policy JP-G2.18	Disagreement of the IA assessment of the policy on Objective 16.	It is considered that the Integrated Assessment [02.01.02] has appropriately assessed the policy against IA Objective 16 in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England
Policy JP-G2.19	The extent of Green Infrastructure shown at Figure 8.3 covers a very significant proportion of Greater Manchester. The policy represents a blanket restrictive policy over much of the city region, and also introduces a number of requirements of development.	It is considered that Policy JP-G2 provides an appropriate policy framework to protect and enhance the green infrastructure network in the plan area. The policy recognises that development maybe appropriate within and around the green infrastructure network and sets out appropriate measures to manage this at a strategic scale.	Emery Planning
Policy JP-G2.20	Concerns regarding the evidence base in respect of carbon emissions and the contribution of green spaces, peat bogs and woodland to prevent climate damage.	It is considered that Policy JP-G2 is supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .	Charlotte Starkey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G2.21	There should be greater transparency in the site selection process / this should be improved.	It is considered that the site selection process is a transparent and appropriate process and is explained in the Site Selection Background Paper [03.04.01 – 03.04.11] .	John Roberts Gary West
Policy JP-G2.22	Recent studies and data which stress the importance of accessible green spaces to mental health have not been considered.	It is considered that Policy JP-G2 is supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .	John Roberts
Policy JP-G2.23	Policy is broad-brushed and should be supplemented by more detailed local studies (e.g. Parish level) which would reveal connectivity issues often requiring urgent addressing.	Paragraph 1.57 of the PfE states that all policies in the plan are strategic and that districts will continue to produce their own Local Plans setting out more detailed policies reflecting local circumstances. No change to the policy is considered necessary.	Edward Beckmann
Policy JP-G2.24	Unclear what the policy involves / what it entails.	The policy provides an appropriate policy framework to protect and enhance the green infrastructure network in the plan area in line with NPPF.	Linus Mortlock
Policy JP-G2.25	The green infrastructure is based on incorrect data and will lead to ill health for more people.	It is considered that Policy JP-G2 is supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26]	Maureen Buttle
Policy JP-G2.26	Maps are not easy to understand.	Whilst it is considered that the clarity of Figures 8.2 and 8.3 could be improved, it is not considered to be a soundness issue, therefore no change is proposed.	Sheila Tod Kate Tod
Policy JP-G2.27	Green Infrastructure should be protected more vigorously through the policy.	It is considered that the approach to protect, manage and enhance green infrastructure is consistent with Paragraph 175 of the NPPF.	Kay Bruce Anne McNally Ian Barker
Policy JP-G2.28	Plan is anti-green infrastructure.	Policy JP-G2 provides a strategic approach to protect, manage and enhance green infrastructure and is consistent with the Paragraph 175 NPPF.	Peter Christie
Policy JP-G2.29	Changes in working practices since Covid 19 mean many people work from home and need accessible open green space within walking distance to preserve their wellbeing.	Noted.	John Roberts
	Other		
Policy JP-G2.30	Comments objecting to the loss of Green Belt - how will this improve health, flooding and bio-diversity?	Comments relating to the loss of Green Belt and exceptional circumstances are considered under the summary of issues raised to Policy JP-G10 Green Belt.	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Exceptional circumstances have not been demonstrated and there should be no net loss.	The PfE needs to be read as a whole and as such Policies JP-S5, JP-P6 and JP-G9 seek to reduce flood risk, improve heath and improve biodiversity respectively. Planning applications on allocations released from Green Belt will need to meet these policy requirements. Furthermore, the relevant allocation policies in PfE detail the necessary policy framework / mitigation to ensure development coming forward at those locations will be in accordance with the plan policies. Further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF. No change to the policy is considered necessary.	
Policy JP-G2.31	Comments relating to Green Belt, woodland and public right of way laws and policies (objecting to building on, claiming ownership and blocking).	Issues relating to the agricultural use of buildings, management of woodland and public right of way on Green Belt are not matters for the strategic policies of the PfE.	C Axon
Policy JP-G2.32	Residents should be afforded / allotted their own land for agriculture, food and farming rather than land being used for jobs and housing for others.	Issues relating to the ownership of agricultural land are not matters for the strategic policies of PfE.	Joanne Maffia

PfE 2021 Policy JP-G3 – River Valleys and Waterways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G3.1	Additional clause to confirm (for the avoidance of doubt) that where development proposals would enhance public access to river valleys and waterways; the harm avoidance mitigation hierarchy must be followed in line with policy JP-G9.	The PfE should be read as a whole, including Policy JP-G9. Therefore, no change is considered necessary.	The Wildlife Trusts
Policy JP-G3.2	Many of these structures are maintained by volunteers and this is not recognised.	Noted, but not a matter for Policy JP-G3. Therefore, no change is considered necessary.	Kim Scragg
Policy JP-G3.3	Although encouraging barges, rowing, walking etc. is of interest there is always danger near water.	Part 8 of PfE Policy JP-P1 Sustainable Places refers to designing places to be safe. Therefore, issues relating to water safety are covered by that policy.	Joanne Maffia
Policy JP-G3.4	The policy proposes increasing rights of way alongside the water; it does not include proposals for increasing rights of way on and in the water (for transport and recreation, such as by kayak or swimming).	Public rights to use waterways for recreation purposes is a legal matter around land and riparian ownership and is outside the scope of the PfE. Therefore, no change is considered necessary.	Helen Fotheringham Matthew Oxley
Policy JP-G3.5	Paragraph 8 fails to mention horse riding within active travel alongside waterways and it is discriminatory to exclude one form of active travel from this objective. Horse riding should be added to walking and cycling in paragraph 8.	Policy JP-G3 is a strategic policy, therefore mentioning all forms of active travel recreation activities would make the policy over long. District Local Plans could set out more detailed active recreation policies, if districts considered it appropriate. Therefore, no change to the policy is considered necessary.	The British Horse Society
Policy JP-G3.6	The Mersey Valley catchment area needs overall consideration with Stockport and the Pennine hinterland to enable flood prevention and alleviation across the bioregion	Paragraph 8.22 of the supporting text to Policy JP-G3 notes that there is a complex network of river catchments, including flowing from the Pennine moors to the east of the conurbation. Also, a catchment based approach to managing flood risk is covered in Policy JP-G5 Flood Risk and the Water Environment. Furthermore, the collaborative approach to the development of the evidence base, understanding cross boundary issues and policy development for the PfE Greener Places chapter policies is acknowledged in the PfE Statement of Common Ground 6 (p44) [01.01.02] . Therefore, no changes to the policy are considered necessary.	Jane Morris

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G3.7	The overall approach needs to avoid waterways being simply regarded merely as waterfronts for new development (as is suggested by point 9 in the policy).	The overall approach in Policy JP-G3 to protect and enhance river valleys and waterways covers nine wide ranging priorities (Parts 1-9), not just Part 9.	Friends of the Earth
Policy JP-G3.8	The Manchester Ship Canal itself is an operational freight waterway; it is not suitable for active travel or for “recreation and commuting”.	Noted, but no changes required to the policy.	Peel L&P Investments (North) Ltd
Policy JP-G3.9	Policy JP-G 3 should be amended to state that “...the improvement of the canals themselves is encouraged...”, for example through enhanced recreational facilities such as marina, boat maintenance and hire facilities, or visitor amenities	It is not necessary to amend Policy JP-G3 as the comments are considered to be covered by Part 9 that seeks to ensure that development relates positively to nearby rivers and other waterways.	Peel L&P Investments (North) Ltd
Policy JP-G3.10	Criterion 1 of Policy JP-G 3 seeks to retain the “open character” of the river valleys, for example by avoiding “prominent” development. However, as acknowledged by Criterion 9, development can enhance the setting of waterways, for example through high quality frontages and public realm improvements. Peel therefore considers that this criterion is unnecessary and should be removed	It is considered that Parts 1 and 9 of Policy JP-G3 are integral parts of the policy and are not within conflict of each other. Therefore, no changes are required.	Peel L&P Investments (North) Ltd
Policy JP-G3.11	The policy and supporting text does not fully recognise or reference issues of specific relevance to the canal network or key differences between the engineered canal network and other waterways. We note specific reference in paragraph 8.23 to the regard new development must have to ensure river corridors are integrated within development and would suggest a similar reference within the supporting text relevant to the protection of waterways such as the canal network.	Paragraph 1.57 of the PfE states that all policies in the plan are strategic and that districts will continue to produce their own Local Plans setting out more detailed policies reflecting local circumstances. In the context of paragraph 1.57, outlining specific issues relevant to the canal network would be too detailed for this strategic policy and would be more suited to detailed policies in district Local Plans. Whilst it is considered that the suggested reference to the protection of waterways in paragraph 8.23 could improve the clarity of the supporting text, it is not considered to be a soundness issue, therefore no change is proposed.	Canal & River Trust
Policy JP-G3.12	Suggested new supporting text as follows, to be added to para 8.21 or as appropriate “New development must be designed to ensure that the stability and structural	It is considered that the suggested wording would be too detailed. Paragraph 8.21 refers to long term management of river valleys and canals, which is considered to adequately cover the suggested wording in the comment. No change is considered necessary.	Canal & River Trust

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>integrity of canal/waterway corridors, any operational or maintenance requirements and intrinsic heritage and ecological qualities are protected and enhanced. It is important that waterways are not simply seen as a backdrop to new development and high quality waterfront design will be critical with waterways appropriately integrated within new development wherever possible.</p>		
<p>Policy JP-G3.13</p>	<p>" Suggested new wording to Policy JP-G3 River Valleys and Waterways</p> <p>2. Promote public enjoyment of the river valleys and waterways, including as key features connecting urban areas to the countryside, providing opportunities for active travel, and enhance their high recreational value as green fingers through densely populated areas; (Recommend that this is moved to become bullet point 1 - as potentially relevant to both river valleys and waterways - before moving on to more specific river valley priorities 2-7.)</p> <p>8. Increase the use of nearby canal corridors and watercourses for recreational use and active travel, with improved access to and enhancement of waterside routes for pedestrians and cyclists where appropriate thereby increasing access to natural green space;</p> <p>9. Ensure that development relates positively to nearby rivers and canals other waterways, taking advantage of opportunities to integrate green infrastructure through the provision of :</p> <p>a. High quality waterside frontages that increase activity and generate natural surveillance of the</p>	<p>The suggested amendment to reorder Part 2 of Policy GM-G3 is not considered necessary as Parts 1 to 9 of the policy are not a hierarchical list.</p> <p>It is considered that Part 8 of the policy sufficiently covers the suggested wording to it. The suggested wording in relation to Part 9 of the policy is not required because: safety and natural surveillance are covered by Part 8 of Policy JP-P1, which deals with safe spaces. Policy JP-P1 also considers designing spaces for different people (Part 3 of Policy-JP-P1); the suggested new part c of the policy is already covered by Part 9 b of Policy JP-G3; and the suggested word for a new part d of the policy on construction is too detailed for a strategic policy and would be better suited to a detailed policy in a district Local Plan. Therefore no changes to the policy are considered necessary.</p>	<p>Canal & River Trust</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>waterway corridor, and encourage and improved access to, along and from the water,</p> <p>b. High quality public realm and waterside boundary treatment alongside the water that considers the interface between waterway users (boaters, walkers, cyclists, anglers etc) and any future waterside community (residents, businesses, etc) including appropriate water safety features where necessary ;</p> <p>c. Appropriate access for water related recreation use and maintenance or operational requirements.</p> <p>d. Appropriate measures to protect the waterway corridor and associated assets from any adverse impact on land stability, structural integrity and water quality both during and post construction."</p>		
Policy JP-G3.14	<p>It must also be recognised that the majority of this land is managed by farmers who use it to produce food as well as other outputs from the land. A careful balance needs to be struck which will allow farmers to continue to produce safe food in a sustainable way and there needs to be a balance between the needs of the agricultural industry and those of the water environment. It is important not base decisions on the historic river pollution coming from farming. Policy decisions should be based on current farm practices and performance and not on residual pollution in water bodies.</p>	<p>Paragraph 5.29 of the supporting text to Policy JP-S5 Flood Risk and the Water Environment recognises that there are various pressures and users on the water environment, including agriculture. Therefore, no change to Policy JP-G3 is considered necessary.</p>	The National Farmers Union
Policy JP-G3.15	<p>The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan.</p>	<p>The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate</p>	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	
Policy JP-G3.16	<p>This policy can be strengthened and made sound by including the following commitments:</p> <p>Removal of the words “wherever possible” from paragraph 8.23 (page 152);</p> <p>Withdrawal of any Allocation that is not aligned with this Policy; and</p> <p>The KPIs need to be updated to ensure they measure all aspects of this Policy.</p>	<p>Removing the words ‘wherever possible’ from the supporting text in Paragraph 8.23 is not considered to be a soundness issue, therefore no change is proposed.</p> <p>Policy JP-G3 will be used to guide all development across the plan area, as appropriate. However, the relevant allocation policies in PfE detail the necessary policy framework / mitigation to ensure development coming forward at those locations will be in accordance with this policy. Further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.</p>	Friends of Carrington Moss
	General Comments		
Policy JP-G3.17	Supports the principles behind this policy. Blue infrastructure is a very important component of the natural landscape, providing habitats and corridors for wildlife and valuable opportunities for outdoor recreation for residents.	Noted.	<p>Woodford Neighbourhood Forum</p> <p>Friends of the Earth</p> <p>Peel L&P Investments (North) Ltd</p> <p>Canal & River Trust</p> <p>Manchester Bolton & Bury Canal Society</p> <p>The Wildlife Trusts</p>
Policy JP-G3.18	Increase the use of canals and watercourses for active travel, with improved and extended rights of way alongside the water providing walking and cycling routes for both recreation and commuting, thereby increasing access to natural green space	This comment is covered by Part 8 of Policy JP-G3. No change to the policy is considered necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G3.19	Questions why the dredging of the rivers and canals stopped. The river bed is rising so the rivers hold less	Comment not related to the soundness of the plan. No changes to the policy are considered necessary.	Jayne Waddell Anne McNally

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	water. This in turn leads to flooding in areas that rarely saw this problem in the past due to the maintenance of the rivers and river banks and the regular maintenance of the sewer network.		
Policy JP-G3.20	The plan to build along the canal and adjoining fields will add to flood risk making homes inaccessible and uninsurable, wildlife will decrease and land that is accessible for recreation will no longer be accessible.	A proportionate evidence base has been provided to assess the impact on flood risk in the Level 1 and Level 2 SFRAs and the Flood Risk Sequential and Exceptions Test Evidence Paper [04.02.01 – 04.02.19] . Paragraph 159 of the NPPF requires development to be made safe from flood risk and not increase flood risk elsewhere. Policy JP-S3 seeks to improve access to recreation along river valleys and waterways. No changes to the policy are considered necessary.	Tracy Owen
Policy JP-G3.21	The plans to build around the Manchester, Bury and Bolton Canal area will have a negative impact on existing wildlife and surely increase flood risks.	Policy JPA7 (Elton Reservoir) states that new development on the site will be required to ensure the allocation is safe from and mitigates for potential flood risk from all sources. The proposed allocation is supported by a range of evidence to demonstrate the development of the site will not have detrimental impact on flood risk [10.03.12 – 10.03.14] and wildlife and ecological matters [10.03.05 – 10.03.11] . The latter is summarised in section 19 of the Elton Reservoir Allocation Topic Paper [10.03.43] . No changes to the policy are considered necessary.	Carl Southward
Policy JP-G3.22	More maintenance and repair programmes are needed presently, how will this happen with increased and unsustainable demand.	Investment infrastructure to meet the needs of the PfE are covered by Policy JP-D1 Infrastructure Implementation, in particular Part 3 of the policy. No changes to the policy are considered necessary.	Maureen Buttle
Policy JP-G3.23	There should be more access to canalsides. They can be utilised better with local heritage, especially in Manchester.	Increasing access to the waterways is a priority of the policy. No changes to the policy are considered necessary.	Rowan Smith
Policy JP-G3.24	The rivers have got chemicals and sewage in them and nothing is being done to resolve this.	This comment is covered by Part 6 of Policy JP-G3 that seeks to improve water quality. No changes to the policy are considered necessary.	Lynn Clegg

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G3.25	Interfering with nature will cause stress and hardship to plant and wild life as well as having a negative impact on residents.	Policy JP-G3 seeks to protect and improve river valleys and waterways as part of the green infrastructure network to benefit wildlife and residents. No changes to the policy are considered necessary.	Trevor Widdop
Policy JP-G3.26	River valleys and waterways will not be protected and improved as central components of Green Infrastructure Network and a vital part of a Nature Recovery Network, making a major contribution to local identity, quality of life and the natural environment.	Policy JP-G3 includes a range of policy requirements to ensure that river valleys and waterways will be protected and improved. No changes to the policy are considered necessary.	E Bowles
Policy JP-G3.27	Building and development is being undertaken in too close proximity to the waterways and, therefore, corridors and buffer zones for wildlife are compromised and unworkable.	Part 9 of Policy JP-G3 seeks to ensure that developments relate positively to waterways and taking advantage of opportunities to integrate green infrastructure. The penultimate paragraph of Policy JP-G2 seeks to ensure that development within and around the Green Infrastructure Network is consistent with delivering major green infrastructure improvements within them. Part 2 of Policy JP-G9 seeks to improve connections between habitats, to protect and enhance the provision of corridors and ecological networks. These policies sufficiently cover the concerns raised and therefore no changes to the policy are considered necessary.	Janet Aunins
Policy JP-G3.28	It is not clear how new infrastructure will be paid for.	PfE Policy JP-D1 Infrastructure, outlines how infrastructure will be implemented to deliver the PfE. Paragraph 12.3 outlines some of the funding mechanisms available. Therefore no changes to the policy are considered necessary.	Collette Gammond Matthew Oxley C Smith
Policy JP-G3.30	This is a flawed policy. Canal sections should be regenerated instead of built over. In Rochdale their old canal side property could be made into masses of new homes without impacting on the green belt.	Policy JP-G3 does not seek to build over canals, but seeks to improve and enhance them as part of the green infrastructure network, including at Part 9 of the policy which seeks to ensure that development relates positively to waterways. Therefore no changes to the policy are considered necessary.	Glenn Dillon
Policy JP-G3.31	Leave natural water alone and free from pollution.	Policy JP-G3 seeks to improve and enhance rivers and waterways, with Part 6 of the policy seeking to improve water quality within them. Therefore no changes to the policy are considered necessary.	Simon Robertson
	Other		
Policy JP-G3.32	Everything has shown that the drive for economic growth overarches all other policies, aims and objectives.	Paragraph 4.79 of the supporting text to Policy JP Strat 13 Strategic Green Infrastructure states that protecting and enhancing the green infrastructure network throughout Greater	Laura Ettrick

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Manchester (including its accessibility) is central to the overall vision for the city region. No changes to the policy are considered necessary.	
Policy JP-G3.33	The whole plan is basically by past promises (eg. re- the Mersey Valley) broken when councils decide they are no longer interested in the green infrastructure	Comment not related to soundness of the plan.	Charlotte Starkey
Policy JP-G3.34	The plan needs to be rewritten to take account of up to date housing needs, protection of green belt, brownfield first approach and with proper regard to equitable site selection and independent ecological and environmental surveys	A full and proportionate evidence base has been produced to support the PfE.	Collette Gammond Julie Halliwell Matthew Oxley C Smith

PfE 2021 Policy JP-G4 – Lowland Wetlands and Mosslands

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G4.1	It must also be recognised that the majority of this land is managed by farmers who use it to produce food as well as other outputs from the land. It is important that this area is recognised and retained as a productive as well as a natural landscape.	Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Paragraph 12.3 supports implementing policies and proposals within the plan. It will require working with necessary stakeholders, including landowners, developers and private organisations.	The National Farmers Union
Policy JP-G4.2	The lowlands and wetlands are not only important for their current habitats but they have a high potential to contain well-preserved in situ material remains of people, early settlement sites and site-specific activities (such as hunting and tool making). Amend	Policy JP-P 2 seeks to ensure objectives to preserve heritage assets are met. In particular criteria 4 seeks to deliver positive benefits that sustain and enhance the historic environment including contributing to the economic viability, accessibility and environmental quality.	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>first paragraph of policy to read: The distinctive flat, open landscape and network of habitats of ecologically valuable lowland wetlands or mosslands, or sites valued for their geodiversity will be protected enhanced and restored, with a strong emphasis on reconnecting local communities to the natural and historic environments. We also recommend adding paragraph to the supporting justification to read: "The lowlands, wetlands and mosslands are irreplaceable repositories of proxy evidence of long-term climate change, changes in relative sea levels, and local changes in vegetation and human land use patterns. They have a high potential for well-preserved in situ archaeological interest. It is therefore important that site of value for geodiversity are protected."</p>	<p>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.</p>	
Policy JP-G4.3	<p>A plan clearly delineating the lowland wetlands and mosslands should be included to identify the area to which the policy applies. Once this is done the policy should be reassessed to confirm if its objectives are deliverable within the defined area.</p>	<p>This is not considered to be a soundness issue, therefore no change is proposed. JP-G4 is a strategic policy. More detail regarding Wetlands and Lowlands is included at Local Plan level and in the Landscape Character and Sensitivity Assessment [07.01.06].</p>	Peel L&P Investments (North) Ltd
Policy JP-G4.4	<p>Paragraph 8.30 sentence should be removed that proposes some sections of undeveloped mossland is appropriate for future development.</p>	<p>Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Areas will only be considered for development where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area. Rewording the paragraph 8.30 of the policy would not be consistent with the aims the policy.</p>	Friends of Carrington Moss
Policy JP-G4.5	<p>Evidence should be provided showing the ecological value of allocations in areas of undeveloped mossland. If information is not available the allocation should be withdrawn.</p>	<p>All site allocations have undergone the site selection process. It is considered that the site selection process is a transparent and appropriate process and is explained in the Site Selection Background Paper Allocation Topic Paper [03.04.01 – 03.04.11].</p>	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G4.6	Natural England advice should be explicitly incorporated into the policy.	Statutory consultees are consulted throughout the process of plan making to ensure plans meet the test of soundness.	Friends of Carrington Moss
Policy JP-G4.7	Policy should set out how high value peaty soil resources will be conserved and managed in a sustainable way. Clearer links with England Peat Action Plan and national policy should be made.	Policy JP-G9 provides for the safeguarding, restoration and sustainable management of our most valuable soil resources to ensure the protection of peat-based soils. The policy is in line with the National Planning Policy Framework (NPPF).	Friends of Carrington Moss
Policy JP-G4.8	The KPIs need to be updated to ensure they measure all aspects of this policy.	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.	Friends of Carrington Moss
Policy JP-G4.9	Point 1 should be amended to include "as well as important species populations" and an additional clause that where development proposals would enhance public access to wetlands and mosslands, the harm avoidance mitigation hierarchy must be followed in line with JP-G9.	The PfE should be read as a whole, including Policy JP-G9. Therefore, no change is considered necessary	The Wildlife Trusts
Policy JP-G4.10	Policy should include a greater emphasis on long-term carbon storage different from point 2. Point 2 should be extended to apply to fen peats.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G4.11	Point 3 warrants an explanatory paragraph on how this could be achieved.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G4.12	Trees and hedgerows are not always suitable to introduce into open lowland wetlands and mosslands. Wording should be amended to refer to increasing features that act as stepping stones for locally characteristic wildlife moving through the area.	Whilst the suggestion is noted, the current policy wording is considered appropriate for a strategic plan therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G4.13	Concerns regarding the inclusion of mossland areas in the list of allocations. These should be re-located and sites restored - the statement in paragraph 8.30 that lowland bog areas will only be developed where they	No change is considered necessary. PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall vision and objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	are shown to be of limited ecological value has clearly not been applied in the site selection process.	mitigation to ensure that development will come forward over the lifetime of the plan to deliver the vision and objectives. As the Plan should be read as a whole, this approach is considered consistent with NPPF.	
Policy JP-G4.14	Do not understand how undeveloped mossland can be developed without irreversibly compromising the green infrastructure of the wider area in terms of ecosystem services that would otherwise deliver significant carbon storage and sequestration into the future.	It is considered that the site selection process is a transparent and appropriate process and is explained in the Site Selection Background Paper [03.04.01 – 03.04.11] .	The Wildlife Trusts
	General Comments		
Policy JP-G4.15	Support for the aim of the policy in slowing down climate change and providing an important ecological resource.	Noted and welcomed.	Laura Ettrick Woodford Neighbourhood Forum Friends of the Earth Peel L&P Investments (North) Ltd Manchester Bolton & Bury Canal Society
Policy JP-G4.16	Welcome reference to hedgerows. Support point 3 that states lowland bog areas will only be developed where they are shown to be of limited ecological value.	Noted and welcomed.	CPRE
Policy JP-G4.17	The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G4.18	Policy seems Brexit-proof, with positive aims building upon the legacy of EU Directives and projects.	Noted and welcomed.	Friends of the Earth
Policy JP-G4.19	No engagement with major landowners of mossland areas has taken place or with tenants who rely on the area for the operation of their agricultural businesses. As such there is no basis to conclude that the policy can achieve enhancements in the eastern area and the policy's deliverability is unclear.	Chapter 12 of the PfE outlines how the Plan, including Policy JP-G4, will be delivered, in particular paragraph 12.3 which outlines the delivery mechanisms that are available to implement the plan policies. Furthermore, Paragraph 1.57 tells us that all policies in the plan are strategic and that district Local Plans can set out more detailed policies reflecting local circumstances. Therefore, no changes to the policy are considered necessary to specify the contribution requirement. It is acknowledged the implementation of any policies would need to use engagement with key stakeholders including landowners.	Peel L&P Investments (North) Ltd
Policy JP-G4.20	Disagree with the assessment of the policy against IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England
Policy JP-G4.21	Support for the aim of re-naturalising rivers and watercourses (as well as improving quality), as part of new development taking place and measures under the Green (and Blue) Infrastructure Network Strategy - such as improving public access, boosting biodiversity plans.	Noted and welcomed.	Friends of the Earth
Policy JP-G4.22	The approach needs to avoid waterways being simply regarded merely as waterfronts for new development (as is suggested by point 9 in the policy).	The PfE should be read as a whole, including Policy JP-G9. Therefore, no change is considered necessary	Friends of the Earth
Policy JP-G4.23	Development of lowlands, wetlands and mosslands contradicts policy on carbon management.	Paragraphs 8.28 of the supporting text to Policy JP-G4 outlines that several restoration projects are underway within the plan area, which will not only have major nature conservation benefits, but could also make a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon. Paragraph 8.30 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Some sections of undeveloped mossland, however, are considered appropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth.	Anne McNally

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.</p> <p>The requirements of Policy JP-G4 should be read in conjunction with the policies that deal with climate change, namely JP-S2 , JP-S3, JP-S4, JP-S5 and JP-S7.</p>	
Policy JP-G4.24	The proposals for wetlands will be undermined by green belt release.	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] .	Gillian Boyle
Policy JP-G4.25	Concern regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA.	See response to row Policy JP-G4.23 above.	Natural England
Policy JP-G4.26	All mossland is to be protected. No sections should be considered appropriate for development now or in the future.	Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Areas will only be considered for development where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G4.27	Evidence base should be prepared by non-partisan, non-biased professionals to fully assess the impact on local/national flora and fauna.	It is considered that Policy JP-G4 is supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .	Janet Taylor
Policy JP-G4.28	Comments regarding lack of trust in protection afforded by policy.	The policy is considered to be sound and based on appropriate and proportionate evidence.	Lynn Clegg
Policy JP-G4.29	Lowlands and wetlands provide an important flood plain function and should not be developed.	Relevant flood mitigation measures will be implemented. Policy JP-S 5 Flood Risk and the Water Environment Policy of the plan sets out the overall approach to managing flood risk.	Jane Barker
Policy JP-G4.30	Policy should be used when deciding planning applications.	The PfE plan will form part of the development plan in each of the 9 Districts and will be considered in the determination planning applications.	Linus Mortlock
Policy JP-G4.31	Lowland wetlands and mosslands should not be included within site allocations.	<p>Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development. Areas will only be considered for development where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.</p> <p>The requirements of Policy JP-G4 should be read in conjunction the policy requirements of the proposed PfE allocations, plus the policies in the PfE that deal with climate change, namely JP-S2, JP-S3, JP-S4, JP-S5 and JP-S7.</p>	Janet Millett
	Other		
Policy JP-G4.32	Comments relating to Green Belt and/or specific site allocations - resisting the destruction of green belt for development.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] .	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G4.33	Comments relating to legal compliance. It is questionable whether PfE and the GMSF can effectively be treated as the same plan.	Comment not relevant to the content of policy JP-G 4. Matter addressed elsewhere.	Matthew Oxley C Smith
Policy JP-G4.34	Comments relating to public consultation process being poor / should be repeated.	Comment not relevant to the content of policy JP-G 4. Matter addressed elsewhere.	Matthew Oxley C Smith

PfE 2021 Policy JP-G5 – Uplands

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
Policy JP-G5.1	Support/agree with policy	Noted and welcomed.	Peter Stanyer Manchester Bolton & Bury Canal Society
Policy JP-G5.2	Enable more people to enjoy the distinctive character of the uplands in sustainable ways which balance the pressures that increased access brings with the physical and mental health benefits that this landscape offers.	Policy JP-G5 Uplands criterion 6 states to enable more people to enjoy the distinctive character of the uplands in sustainable ways.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G5.3	The upland areas of the region are one of its defining features, providing special habitats for wildlife, spectacular beauty and enormous benefits to residents from far and wide in opportunities for outdoor recreation. We support strong protection of these areas.	Support is noted	Woodford Neighbourhood Forum
Policy JP-G5.4	Avoid Green Belt release in the uplands.	As referenced in paragraph 8.35 no land is proposed to be removed from the Green Belt for development within the uplands.	Peter Stanyer Jane Barker
Policy JP-G5.5	An "assumption" that the uplands will be preserved as they are at the moment is not a guarantee.	See response to Policy JP-G5.4	Kay Bruce
Policy JP-G5.6	Concerns relating to keeping the Green Belt and green field areas.	See response to Policy JP-G5.4	See Appendix.
Policy JP-G5.7	There is no proof of exceptional circumstances.	See response to Policy JP-G5.4	Alan Sheppard
Policy JP-G5.8	Concerns regarding taking Green Belt for more housing.	See response to Policy JP-G5.4	Paul Roebuck

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G5.9	We need so much woodlands to be brought back and wild flowers meadows for the massive decline in insects along with other rapidly declining animal species	Policy JP-G5 Uplands criterion 2 refers to upland habitats as an ecologically connected network. In addition JP-G7 includes a number of references to enhancing and protecting woodland.	Samantha Dugmore
Policy JP-G5.10	Your plans here specifically mentions protecting "Sites of Biological Importance (SBIs), Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), woodlands and habitats vulnerable to climate change" except where GGGV needs to be built.	Comment not relevant to the content of the Uplands chapter. Matter addressed elsewhere.	E Bowles
Policy JP-G5.11	Protect and leave all nature alone.	Policy JP-G 9 seeks to enhance net biodiversity over the plan as a whole.	Simon Robertson
Policy JP-G5.12	Supports the approach, especially extending areas of blanket peat bog, which assists in carbon sequestration; natural tree planting and improving its role in water storage, flood risk management etc. The upland areas are also quite heavily populated by national and European designations.	Support noted and welcomed.	Friends of the Earth
	Amendments / Additions to the Policy		
Policy JP-G5.13	The majority of this land is managed by farmers who use it to produce food as well as other outputs from the land. It is important that this area is recognised and retained as a productive as well as a natural landscape. The majority of these areas will be characterised by upland cattle and sheep farming and can provide multiple benefits. They are also a key resource in terms of food production and hill sheep provide the bedrock of much of the domestic sheep industry. Farmers and land managers have the potential to unlock various benefits.	Paragraph 12.3 recognises that the implementation of policies and proposals in the plan requires making the best of all appropriate delivery mechanisms available including working in partnership with necessary stakeholders, including landowners, developers and private organisations. No change is considered necessary. Policy JP- G5 is considered to be consistent with NPPF and provides an appropriate strategy to uplands and green infrastructure issues, which is a key objective of the plan.	The National Farmers Union

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Positive engagement with the farming community will be key in unlocking these opportunities as will fair financial rewards where their activity undertaken on behalf of the council or other individuals. These upland farms are important with respect to cultural heritage as well as the tourism industry in the area. Policies which advocate increasing nature at the expense of agriculture can lead to reduction in the number of people living and working in these rural areas.		
Policy JP-G5.14	Recommendation: The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan. Otherwise these policies are unsound.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G5.15	Modification This policy can be strengthened and made sound by including the following commitments: <ul style="list-style-type: none"> • explicitly incorporation of the advice from Natural England in this Policy • set out how high value (peaty) soil resources will be conserved and managed in a sustainable way • clearer links are made between this Policy and the NPPF • withdraw any Allocation that is not aligned with this Policy • the KPIs need to be updated to ensure they measure all aspects of this Policy 	JP-G5 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for uplands as an important part of the green infrastructure network. Further details of which can be found in the relevant supporting papers. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	Friends of Carrington Moss
Policy JP-G5.16	Support this policy although we would welcome an additional clause to confirm (for the avoidance of	Welcomed and support noted. The plan needs to be read as a whole therefore it is not considered necessary to repeat the provisions of Policy JP-G9 in this policy.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	doubt) that, where development proposals would enhance public access to uplands, the harm avoidance mitigation hierarchy must be followed in line with policy JP-G9.		
Policy JP-G5.17	Part 6 states: Enable more people to enjoy the distinctive character of the uplands in sustainable ways which balance the pressures that increased access brings with the physical and mental health benefits that this landscape offers. The Peak District National Park Authority would welcome the opportunity to work with GMCA / Oldham MBC to look at ways in which this can be achieved.	Support welcomed.	Peak District National Park Authority
Policy JP-G5.18	Due care and attention should be paid to heritage assets that may be affected in upland areas including the paleoenvironmental deposits mentioned in the lowland mosses. Peats can contain proxy evidence for climate and sea-level change, vegetation and land use and early settlements and activity areas; including in the uplands, many mortuary and funeral monuments. In addition to the buried paleoenvironmental and settlement evidence for example, that needs to be protected and conserved, there will be historical water management assets such as culverts, reservoirs, weirs etc. It should be noted that these can be re-activated for use in modern flood storage and alleviation schemes. Working with and not against, the historic environment can have the potential to utilise it in a positive way to enhance current conditions. This should be better reflected within the policy, in particular bullet 5.	Policy JP-P 2 seeks to ensure objectives to preserve heritage assets are met. In particular, criterion 4 seeks to deliver positive benefits that sustain and enhance the historic environment including contributing to the economic viability, accessibility and environmental quality. Policy JP-S 5 seeks to deliver appropriate flood risk management systems.	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G5.19	<p>Bullet 3 should be amended to read: Taking a planned approach to Significantly extending the area of active blanket bog, both through the protection of existing sites and the positive restoration of degraded areas to contribute to important functions such as flood risk management and carbon sequestration;</p> <p>Bullet 5 should be amended to read: Increase the role of the area in water storage, flood risk management (through Natural Flood Management) and water quality improvements, as part of a catchment-based Approach whilst ensuring that proposals conserve the historic and natural environments; and The supporting text also needs to be enhanced in view of the above.</p> <p>Our advice is to add an additional sentence to paragraph 8.33 to read “It will also be important that evidence of archaeology including palaeo environmental and settlement deposits are protected.</p> <p>Paragraph 8.29 should be revised to refer to archaeology per se rather than just industrial archaeology</p>	<p>Whilst the alternative suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.</p> <p>.</p> <p>Noted. Policy JP-S 5 Flood Risk and the Water Environment seeks to deliver appropriate flood risk management systems.</p>	Historic England
Policy JP-G5.20	<p>Historic England disagrees with the Places for Everyone -IA that JP-G5 a positive effect on IA Objective 16.</p>	<p>The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01].</p>	Historic England
Policy JP-G5.21	<p>United Utilities wishes to note that parts of Greater Manchester are public water supply catchment land. This is often located in the upland areas. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land</p>	<p>Whilst the alternative suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.</p>	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>used for public water supply catchment purposes. In cases of wind energy proposals on water catchment land the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land. We recommend you include the following additional criterion relating to water catchment land in Policy JP-G 5. Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration should be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.</p>		
	Other Comments		
Policy JP-G5.22	Not enough planned and lacks parity.	Paragraph 8.31 seeks to ensure cross boundary working across the borough and beyond to address any upland issues that may arise.	Maureen Buttle
Policy JP-G5.23	Question legality of the plan	Comment not relevant to the content of the Uplands chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.24	No exceptional circumstances	Comment not relevant to the content of the Uplands chapter. Matter addressed elsewhere.	Matthew Oxley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G5.25	Does not take into consideration Covid and Brexit	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] .	Matthew Oxley
Policy JP-G5.26	How will Duty to cooperate be achieved with Stockport.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.27	35% Manchester uplift for PFE.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.28	The data used in the plan is outdated for housing need.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.29	Consultation has been poor.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.30	Not clear how new infrastructure will be paid for.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.31	Employment provision should be identified.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Matthew Oxley
Policy JP-G5.32	Views will be lost.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Colin Walters
Policy JP-G5.33	Unsound.	The way the current policy is worded it is currently considered sound, therefore no change is deemed necessary	Holli Dobson
Policy JP-G5.34	Public consultation has not been sufficient in reaching the non-digital community.	Consultation was undertaken in accordance with the Statements of Community Involvement of the 9 councils as set out in the SCI Compliance Statement.	Alan Sheppard
Policy JP-G5.35	The plan should be stopped	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Peter Stratton Martin Rigby
Policy JP-G5.36	This is probably where those with money live so of course there will be very little if any development there.	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Jacqueline Charnock
Policy JP-G5.37	Not making enough use of available brownfield sites	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Martin Rigby Glenn Dillon

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G5.38	Houses are being built when they don't need to be and this is damaging the environment	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere.	Glenn Dillon
Policy JP-G5.39	Comment regarding specific site allocations	Comment not relevant to the content of the Uplands Greener Chapter. Matter addressed elsewhere with specific site allocations.	See Appendix.

PfE 2021 Policy JP-G6 – Urban Green Space

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
Policy JP-G6.1	Why keep green spaces but destroy Green Belt. Do not build on Green Belt.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] As stated in paragraph 8.41 currently less than half of Greater Manchester residents live within 300 metres of an accessible natural green space of at least 2 hectares in area. The places of greatest deficiency tend to be the more densely developed urban areas. Part of the overall strategy is to make best use of previously-developed land in order to reduce the need for developing greenfield sites, but this can only result in quality places if it is accompanied by improvements in the functionality of green space, particularly in higher density urban locations.	See Appendix.
Policy JP-G6.2	All green spaces should be protected from development. They will be destroyed by these proposals	Policy JP-G 6 specifically seeks to protect and enhance existing urban green space to support a high quality of life in urban areas. .	Michael Young Linus Mortlock Andrew Jay Peter Stratton Alison Doherty Carl Southward
Policy JP-G6.3	Urban Greenspace should be favourable to wildlife.	Paragraph 8.6 to 8.15 refers specifically to the Green Infrastructure Network, in particular point 8.12 refers to Local Nature Recovery Strategies which will assist in supporting local wildlife. In addition Policy JP-S 4 Resilience criteria 7 refers to enabling the city region, its citizens and wildlife to adapt to changing conditions.	Samantha Dugmore
Policy JP-G6.4	Existing greenspaces should be enhanced through the development process.	As noted in paragraph 8.1, the GMCA is committed to the Government's approach as set out in the 25 Year Environment Plan to deliver a better natural environment for people and wildlife and ensuring that it is accessible for everyone.	Simon Robertson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G6.5	These green spaces identified in the plan are no substitution for the natural green spaces that will be lost to the proposed development sites along with the loss of wildlife. Loss of green spaces from the proposed developments will have an impact on both humans and wildlife	See response to Policy JP-G6.1 above. No change is considered necessary. JP-G6 is a strategic planning policy, which sets out an appropriate strategic policy framework for green spaces, consistent with the NPPF. Policy JP-S4 specifically refers to increasing the interconnected of Green Infrastructure and enabling citizens and wildlife to adapt to changing conditions.	Janet Taylor Leigh Ornithological Society
Policy JP-G6.6	Concerns raised that Local Authorities can't be trusted to protect green spaces.	Not relevant to the soundness of the plan.	Lynn Clegg
Policy JP-G6.7	The Plan has significantly reduced the amount of Green Belt land to be released but we still have very significant concerns at the impact on landscape character and the loss of accessible green space that would result from aspect of this plan.	Not relevant to this policy which is concerned with urban green space.	Ramblers Greater Manchester and High Peak Area
Policy JP-G6.8	Green spaces should be retained to help to mitigate the effects of Climate change	Paragraph 8.39 highlights the significant importance of urban green space in managing the effects of climate change. Responding to the impact of climate change is a key theme within the plan as pointed out in paragraphs 5.5 to 5.7 in the Sustainable and Resilient Places chapter. The plan has been subject to Strategic Environmental Assessment (SEA), as part of the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report [02.01.01] states that the assessment has taken account of the fact that all the districts have declared a climate emergency.	David Hawes Brenda Foley Jill Neal
Policy JP-G6.9	Support for the policy and known benefits for the environment.	Noted and welcomed.	Royal London Asset Management Manchester Bolton & Bury Canal Society Greater Manchester Housing Providers
Policy JP-G6.10	RLAM recognises the significant role of Urban Green Space and agrees with policies contained in JP- G 6.	Noted and welcomed.	Royal London Asset Management
Policy JP-G6.11	No exceptional circumstances for Green Belt have been met	Not relevant to this policy which is concerned with urban green space.	Collette Gammond Alan Sheppard C Smith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G6.12	There will be no Green Belt left in GM by 2115.	Not relevant to this policy which is concerned with urban green space.	Ian Barker
Policy JP-G6.13	The land discussed on the boundary between urban and countryside and has the main ring road running through is so vulnerable to pollution. It is also a valuable natural habitat.	Protecting natural habitats, enhancing biodiversity, and reducing the health impacts of air pollution are all key objectives of the plan, with various policies, including JP-S4 Resilience, JP-S 6 Clean Air and JP-G9 A Net Enhancement of Biodiversity and Geodiversity, providing a robust policy framework to achieve this.	C. Axon
Policy JP-G6.14	Horse riding should be added to walking and cycling as a positive use of urban green space	No change is considered necessary. The strategic policies are considered to be consistent with the NPPF and provides an appropriate strategy to encompass healthy and safe communities which is a key objective of the Plan and NPPF.	The British Horse Society
Policy JP-G6.15	Concerns regarding how will urban green space be protected?	Policy JP-G 6 Urban Green Space and its supporting text refer specifically to the essential role that urban green space has in responding to health and wellbeing, local character and the environment and its importance. In addition, Policy JP-S 4 Resilience criteria 7 refers to enabling the city region, its citizens and wildlife to adapt to changing conditions.	Laura Charlotte
Policy JP-G6.16	There should be footpaths connecting more urban areas to the open countryside, these should be provided and maintained.	Policy JP-P 7 Sport and Recreation (criterion B and C) seek to improve access to, and connections between different part of the green infrastructure network within GM and beyond and expand the network of strategic recreation routes over longer distances. The plan as a whole seeks to safeguard and improve quality of life of local residents, for example in Policy JP-P 1 which focusses on the delivery of sustainable places.	Ceridwen Haslam
Policy JP-G6.17	Reduce the number of houses being built on Green Belt.	Not relevant to this policy. Matter addressed elsewhere	Julie Jerram
Policy JP-G6.18	The quantity and location of urban greenspace needed should be identified.	Not relevant to the soundness of the plan. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	Anne McNally
	Amendments / Additions to Policy		
Policy JP-G6.19	Manchester Friends of the Earth would suggest a rewording of the policy to be specific (defining other considerations) or at least refer to the ability of Local Plans to formulate more detailed considerations. We support the creation of new Urban Green Space. We	Support is noted. Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	agree that densely developed urban areas need quality accessible green space, and agree brownfield land should be reused for urban green space where deficiencies exist. Importantly, once a previously developed site has a value for green space, it should cease to be recorded as brownfield and should be given policy protection as an Urban Green Space.		
Policy JP-G6.20	First bullet points - "Existing urban green space will be enhanced and protected in balance with other considerations and The GMCA and districts will work with developers and other stakeholders to deliver new urban green spaces. " We request an amendment, to read: "Existing urban green space will be enhanced and protected. We wish to remove the rider in balance with other considerations. Will the Greater Manchester authorities undertake to safeguard these Urban Green Spaces, especially where they are Registered Historic Designed Landscapes, by giving them Statutory Protection? The present material consideration in the NPPF is too weak to prevent harmful development, within them and in their wider setting.	Policy JP- P6 is in accordance with NPPF and provides an appropriate strategy to conserve and enhance urban green space. It is not considered appropriate to amend the policy as suggested.	Lancashire Gardens Trust
Policy JP-G6.21	CPRE recommends the wording of the policy is strengthened as it says "in balance with other circumstances, which could unintentionally promote its development.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary	CPRE
Policy JP-G6.22	The Canal & River Trust has no objection in principle to Policy JP-G6 but believes that minor changes to the supporting text are necessary to improve clarity and increase the effectiveness of the policy.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary	Canal & River Trust

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G6.23	We ask that the definition of Urban Green Spaces is amended to include reference to assets such as canal towpaths. This could be achieved by a relatively minor amendment to paragraph 8.37 as suggested below. "8.37 Urban green infrastructure includes parks, playing fields and other sports and recreation facilities, but they also include nature reserves, woodlands, allotments, cemeteries, former rail corridors, canal towpaths and other undeveloped land.	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.	Canal & River Trust
Policy JP-G6.24	Page 159 Policy JP-G 6 welcomed inclusion of easy access by walking and cycling	Welcomed and support noted.	Trans Pennine Trail
Policy JP-G6.25	Broadly agree with this policy, however, the statement that greenspaces will be protected and enhanced and balanced with other considerations is too vague. Suggest that an additional point is included: "Urban green space should be favourable to wildlife and, where possible, physically connect to the wider environment.	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. Policy JP-G9 seeks to enhance net biodiversity over the plan as a whole, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G6.26	Recommendation: The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan. Otherwise these policies are unsound.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G6.27	The Policy should be strengthened to make explicit reference to reducing the loss of existing trees and hedgerows, particularly mature trees and historic hedgerows, across the Region. Many are lost each year to development. This could be reduced with more involvement of local residents and more effort to avoid	Policy JP-G7 aims to protect trees and woodland and significantly increase tree cover in Greater Manchester. The plan should be read as a whole, and the current policy wording is considered sound, therefore no change is considered necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	such losses. Paragraph 8:45 (page 161) should be strengthened and reference should be made in the Policy to the Hedgerow Regulations 1997.		
Policy JP-G6.28	<p>Should specifically in-corporate hedgerows. We would have expected to see evidence that sets out the current and expected tree coverage (and historic hedgerows) in each of the Allocations. Without this evidence, the Policy is not Justified because the availability of such information may result in different decisions about those Allocations. Modification: This policy can be strengthened and made sound by including the following commitments:</p> <ul style="list-style-type: none"> • update this Policy to include hedgerows and reference should be made to the Hedgerow Regulations 1997 • the provision of evidence showing the current and expected tree (and hedgerow) coverage in each of the Allocations • withdrawal of any Allocation that is not aligned with this Policy • the KPIs need to be updated to ensure they measure all aspects of this Policy. 	JP-G6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for urban green space as an important part of the green infrastructure network. Further details of which can be found in the relevant supporting papers. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	Friends of Carrington Moss
Policy JP-G6.29	GM should be aspiring to raise the level of tree cover to at least the national average (paragraph 8.44, page 161) and believe this should be just one of the KPIs set out on page 394.	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.	Friends of Carrington Moss
Policy JP-G6.30	Support Policy JP-G 6 and as illustrated on the parameters plan for land at Warburton Lane (provided at Appendix B), accessible urban green space and green infrastructure provision will be incorporated into residential development on the site. North-south green	Noted and welcomed.	Redrow Homes Trafford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	infrastructure connections across the site will help break up built form and enhance connections through the site and to Red Brook and Partington.		
Policy JP-G6.31	Please publish your long-term findings before starting to implement or enact these PfE proposals that, although the proposals are now called Places For Everyone, ie. they are considering people, that the Flora and Fauna within GM is looked after too and that all existing Green Corridors are preserved and that the network of these corridors is enhanced. This would be in line with the document recently published by MCC, "My Wild City" and other laws, rules and guidance	Paragraph 1.20 of the Green Infrastructure policy Context [07.01.01] states that the larger site allocations will provide opportunities to incorporate major areas of new accessible green infrastructure, delivering overall net gains in green infrastructure value to the benefit of local communities. Therefore, the quantity of good quality accessible green infrastructure is expected to increase.	Ian Barker
Policy JP-G6.32	The delivery of greenfield sites as part of a mixture of sites will aid the delivery of development both in terms of housing type/mix (including affordability) and lead in times (including deliverability). EAS would also add that the utilisation of unused and inaccessible urban green space for development can present opportunities to facilitate access to residual land in the form of amenity space. It would not be effective or justified to necessarily restrict the delivery of development on suitable green space in urban areas, particularly as this assists with the protection of the Green Belt. EAS consider Land at Moss Lane is a prime example of such an opportunity.	Comment not specifically relevant to this chapter. This will be covered in the assessment of the Omission Sites.	Emerson Automation Systems UK Limit
Policy JP-G6.33	That new housing estates are only granted planning permission if they are permeable to walkers and cyclists	Ensuring new development is designed to encourage and enable active and sustainable travel is a key objective of the plan. This is reflected in various policies in the plan including Policy JP-C7 Transport Requirements of New Development, JP-Strat 13 Strategic Green Infrastructure and JP-P1 Sustainable Development.	Ian Barker
Policy JP-G6.34	The Council will seek to maintain or enhance sites of biodiversity and geological value throughout the City.	Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity criterion C aims to achieve a net gain in biodiversity and priority habitats.	Ian Barker

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Developers will be expected to identify and implement reasonable opportunities to enhance, restore or create new biodiversity, either on-site or adjacent to the site, contributing to linkages between valuable or potentially valuable habitat areas where appropriate.		
Policy JP-G6.35	Promote walking and footpaths/rights of way. Prioritise maintenance and investment in the rights of way network and to ensure that all new developments included positive measures to enable more people to walk and enjoy the benefits of walking	See response to Policy JP-G6.33 above.	Ramblers Greater Manchester and High Peak Area
Policy JP-G6.36	Policy JP-G 6 Urban Green Space The policy is unsound because it is ineffective. In addition to its recreational benefits, it would be helpful if the Mayor could clarify if the provision of urban green space in line with this policy, can also contribute towards biodiversity gain targets, in line with Policy JP-G 9, where planting is provided. We think that this should be allowed, and it would be helpful if the policy stated this.	Policy JP-G 6 Urban Green Space is considered to be effective as it will ensure type, quality and distribution of accessible urban green space. The plan needs to be read as a whole therefore Policy JP-G9 would apply to proposals on urban green space. Therefore, no change is considered necessary.	Home Builders Federation
	Other Comments		
Policy JP-G6.37	The population growth does not require this much development	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Maureen Buttle
Policy JP-G6. 38	Ensure you include an allotment site in every planning application	Paragraph 9.38 sets out that standards for access to some recreation facilities such as parks, sports pitches and allotments will be set by individual local authorities in their Local Plans.	Salford Allotment Federation
Policy JP-G6.39	The UK has one of the lowest percentages tree cover in Europe	Noted.	Roy Chapman
Policy JP-G6.40	Questions regarding the legality of the plan	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Matthew Oxley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G6.41	Reconsider using brownfield sites	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Brenda Foley
Policy JP-G6.42	The plan should be dropped	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Peter Stratton
Policy JP-G6.43	The consultation has been unsatisfactory	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Alan Sheppard
Policy JP-G6.44	The plans do not go far enough in detailing how we reduce risk	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Janine Lawford
Policy JP-G6.45	Comment regarding soundness of plan and legality.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Collette Gammond
Policy JP-G6.46	Comment relating to how will duty to co-operate be fulfilled with Stockport.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	C Smith
Policy JP-G6.47	There has been an overall lack of public consultation.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	C Smith
Policy JP-G6.48	More houses and loss of land will create floods.	Relevant flood mitigation measures will be implemented. Policy JP-S 5 Flood Risk and the Water Environment Policy of the plan sets out the overall approach to managing flood risk.	Alan Bayfield
Policy JP-G6.49	Concerns in regards to specific site allocations.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere with regards to specific site allocations.	See Appendix.
Policy JP-G6.50	Green Belt information not suitable for layman. Needs a concise summary.	Not relevant to this policy which is concerned with urban green space.	Mark H Burton

PfE 2021 Policy JP-G7 – Trees and Woodland

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
Policy JP-G7.1	Support the objective of Policy to expand tree cover across GM and subsequent benefits	Support is noted	See Appendix.
Policy JP-G7.2	Support this Policy but it should also specifically incorporate hedgerows, which are highly valued and also provide essential ecosystem services.	General support is noted. The value of hedgerows is referenced in policy JP-G4. Policy JP-G7 specifically deals with trees and woodland and therefore no change is necessary.	CPRE Friends of Carrington Moss The Wildlife Trusts
Policy JP-G7.3	Protection of Ancient and Semi-Natural Woodland needs to be stronger	NPPF provides strong protection for Ancient and Semi-Natural Woodland. There is no need to replicate NPPF in PfE policy.	Peter Stratton Jeremy Williams
Policy JP-G7.4	Identify locations at a strategic level, where tree planting will be required. Identify a practical mechanism for delivering it.	Given the nature of the PfE plan, it is not practical to identify, even at a strategic level, locations where tree planting would be required. This is a matter more appropriately dealt with at the local level having regard to relevant PfE and Local Plan policies.	Anne McNally
Policy JP-G7.5	Tree planting and replacing lost trees should be a priority	Criterion 12 of the policy states that where development would result in the loss of existing trees, replacement on the basis of two new trees for each tree lost would be required. This should preferably be undertaken on-site.	Leigh Ornithological Society Tracy Owen City of Trees
Policy JP-G7.6	If we are going to specify that two trees are needed to replace every one tree removed, then to stop developers from replacing trees with the smallest specimens possible and using low level planting specifications which will not lead to trees achieving their growth potential, there should be a reference made to replacing trees to a size and standard that will properly compensate for the loss of the ecosystem services that were provided by the trees that have been felled.	Specifying the size and types of trees within the PfE plan is too specific for a strategic document such as this. Paragraph 8.44 of the PfE plan notes that Greater Manchester Tree and Woodland Strategy, being prepared on behalf of Greater Manchester by the City of Trees initiative, with the intention of being formally adopted as guidance which can inform planning decisions. Paragraph 3.27 of the Natural Environment Topic Paper [07.01.26] notes that the aims and objectives of the strategy include a higher standard of planting, incorporating bigger and native species.	City of Trees
Policy JP-G7.7	Wildlife safety should be considered in priority areas	Specific allocation policies and Policy JP-G9 include a range of measures that address biodiversity as a priority. Policy JP-S4 specifically refers to increasing the	Anthony Dann Miriam Latham

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		interconnectedness of Green Infrastructure and enabling wildlife to adapt to changing conditions.	
Policy JP-G7.8	An area that is deemed a new wood (only 50 years old) is easily at risk. Protect new woodland.	Policy JP-G7 covers all types of woodland and criterion 1 of the policy seeks to protect all woodland habitats.	Linus Mortlock Roy Chapman
Policy JP-G7.9	Support the Greater Manchester Trees and Woodland Strategy as it is in line with campaign objectives	As stated in the policy, the aim is to support delivery of the Greater Manchester Tree and Woodland Strategy	Friends of the Earth
Policy JP-G7.10	There is an abundance of wildlife which is being negatively impacted by loss of habitat and busier roads. There are brownfield sites elsewhere in the borough which should be developed.	A number of the policies in the Greener Places chapter address the issue of the protection of wildlife and habitats where development is proposed such as JP-G9, and the achievement of net gain in sustainable development. In addition, the individual allocation policies address these matters through both policy requirements and through supporting evidence. See Biodiversity Net Gain [07.01.03] . The supply of dwellings on brownfield land and vacant buildings has been maximised as set out in the Housing Topic Paper [06.01.03] .	Miriam Latham
Policy JP-G7.11	The policy is unsound because it is unjustified. This policy is unclear in terms of what applicants are expected to do. It is unclear if every part of this policy applies to applicants seeking planning permission. For example, would an applicant be required to plant a tree for every resident in a new scheme, or the net increase in residents? In the way it is currently worded, the policy would not conform with para. 16 of the NPPF.	The planting of a tree for every resident is set out in the policy as a City of Trees initiative over the next 25 years and is not a development management requirement. It is considered that this is clear however whilst the clarity of the policy could be improved, it is not considered to be a soundness issue, therefore no change is proposed	Home Builders Federation
Policy JP-G7.12	Ensure that builders put in appropriate planting	Criterion 8, 12 and 13 of policy address issues relating to trees and development. Paragraph 8.44 of the PfE plan notes that Greater Manchester Tree and Woodland Strategy, being prepared on behalf of Greater Manchester by the City of Trees initiative, with the intention of being formally adopted as guidance which can inform planning decisions.	Ann Guilfoyle
Policy JP-G7.13	Use strategies to combat changes in the climate change	The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan.	Natalie Hamer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G7.14	The majority of this land is managed by farmers who use it to produce food as well as other outputs from the land. It is important that this area is recognised and retained as a productive as well as a natural landscape.	<p>Paragraph 8.30 of the supporting text to Policy JP-G4 outlines the importance of the habitats and wider landscape means that there is a strong emphasis in the Plan on their retention and improvement, and the majority of these areas will see little or no development.</p> <p>Paragraph 12.3 of the plan supports implementing policies and proposals within the Places for Everyone plan. It will require working with necessary stakeholders land owners, developers and private organisations.</p>	The National Farmers Union
Policy JP-G7.15	Tree planting should be complementary to food production where possible, as should other activity to tackle climate change. There is an opportunity to improve the management of woods which are already on farms. Many of these woodlands represent an untapped resource on farms. Would like to see the recognition of unmanaged farm woodlands, and the need to incentivise management and to see increased recognition and incentives for trees outside of woodlands.	The policy seeks to significantly increase tree cover across the plan area. This includes managed and unmanaged woodlands and trees outside of woodlands Criterion 11 of policy JP-G7 encourages the positive management of woodland to bring it into a more productive state. In terms of implementing the policies in the plan, paragraph 12.3 notes the need to work in partnership with landowners, developers and other private sector organisations to secure deliverable development proposals and investment.	The National Farmers Union
Policy JP-G7.16	Policy JP-G 7 sets out that a new City Forest Park will be established in Salford, Bolton and Bury. PfE does not set out the proposed location of this Park or how it will be delivered.	City Forest Park is a strategic initiative being delivered by a partnership of the Forestry Commission and the City of Trees. Information can be found here .	Peel L&P Investments (North) Ltd
Policy JP-G7.17	PfE should be modified by the addition of a diagram which identifies an indicative location for the new City Forest Park and supporting text which highlights a timescale, delivery mechanism and funding source/s for its delivery.	This plan does not designate the park. Further information can be found here .	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G7.18	Recommendation: The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan. Otherwise these policies are unsound.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G7.19	Improving public access to woodland and trees particularly by sustainable travel models to capture the health and wellbeing benefits whilst managing the associated pressures... Facilitating greater access to nature, particularly within urban areas... New housing estates are only granted planning permission if they are permeable to walkers and cyclists	Criterion 10 of policy JP-G7 refers to improving public access to woodland and trees particularly by sustainable travel modes to capture health and wellbeing benefits. Criterion 1 of policy JP-C7 states the need to ensure that new developments are planned and constructed with walking and cycling as the primary means of local access, and fully integrated into the existing walking and cycling infrastructure	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G7.20	If you calculate and predict the state of the Green Spaces in GM at various points in time, up to at least 100 years in the future. The conclusion was, based on the direction and trends in the GMSF that there would be No Green Belt left in GM by 2115.	The PfE Plan contains a number of policies that seek to protect and enhance green spaces across the plan area.	Ian Barker
Policy JP-G7.21	Please publish your long-term findings before starting to implement or enact these PFE proposals. -- that, although the proposals are now called Places For Everyone, ie. they are considering people, that the Flora and Fauna within GM is looked after too. -- that all existing Green Corridors are preserved and that the network of these corridors is enhanced. This would be in line with the document recently published by MCC, "My Wild City" and other laws, rules and guidance	See response in to Policy JP-G7.20 above. It is considered that a proportionate evidence base has been provided to support these policies, in particular the Natural Environment Topic Paper [07.01.26] .	Ian Barker
Policy JP-G7.22	The policy as currently worded is not clear, especially part (3), and further clarity must be given to explain what they mean by 'every resident in the plan area'.	See response to Policy JP-G7.11 above.	Redrow Homes Trafford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	This requirement is ambiguous as it could be read as the number of people living in GM as of 2019, as of today (2021) or the forecast number people living in GM at the end of the plan period. This policy is not measurable and should be amended as it is not considered sound.		
Policy JP-G7.23	Furthermore, planting trees places additional financial burdens on developments. Redrow objects to this policy as there is no evidence prepared to justify that through a Plan wide or site specific viability review has demonstrated that additional trees can be provided, or acknowledged that it will be taken account of in assessing the viability or the sites and their delivery of affordable housing and other contributions.	See response to Policy JP-G7.11 above.	Redrow Homes Trafford
Policy JP-G7.24	Point (3) should be deleted from this policy	See response to Policy JP-G7.11 above.	Redrow Homes Trafford
Policy JP-G7.25	Point (12) should be re-worded requiring one new tree for each tree lost rather than two new trees – planting trees places additional financial burdens on developments which needs to be acknowledged as part of a viability review.	No change considered necessary. The plan seeks to significantly increase tree cover, and replacing trees on a 1:1 basis would not achieve this.	Redrow Homes Trafford
Policy JP-G7.26	Would have expected to see evidence that sets out the current and expected tree coverage (and historic hedgerows) in each of the Allocations. Without this evidence, the Policy is not Justified because the availability of such information may result in different decisions about those Allocations	It is considered that a proportionate evidence base has been provided to support the Allocations policies. The responses to comments on the individual allocation sets out the evidence that has produced including relevant links.	Friends of Carrington Moss
Policy JP-G7.27	Agree that GM should be aspiring to raise the level of tree cover to at least the national average (paragraph 8.44, page 161) and believe this should be just one of the KPIs set out on page 394.	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.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G7.28	<p>This policy can be strengthened and made sound by including the following commitments:</p> <ul style="list-style-type: none"> • update this Policy to include hedgerows and reference should be made to the Hedgerow Regulations 1997 • the provision of evidence showing the current and expected tree (and hedgerow) coverage in each of the Allocations • withdrawal of any Allocation that is not aligned with this Policy • the KPIs need to be updated to ensure they measure all aspects of this Policy. 	<p>JP-G7 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for Trees and Woodland encouraging the positive management of woodland. It is supported by a proportionate evidence base, including Biodiversity Net Gain Proposed Guidance for Greater Manchester [07.01.03].</p> <p>It will be used to guide all development across the plan area, as appropriate. However, the relevant allocation policies in PfE detail the necessary policy framework / mitigation to ensure development coming forward at those locations will be in accordance with this policy; further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	Friends of Carrington Moss
Policy JP-G7.29	All JP-G Policies [Section 8 Greener Places Page 142 onwards and in particular Our Green Infrastructure Network Page 145 onwards] are in accord with our Vision for the future of The Manchester Bolton & Bury Canal. The Manchester Bolton & Bury Canal fits in perfectly to implementing these policies	Support is noted	Manchester Bolton & Bury Canal Society
Policy JP-G7.30	Would also like to see reference to the benefits of natural regeneration (managed succession) in this policy, as this is the most effective mechanism to create a functioning woodland. Would also like to see strong guidance on the careful planning of new plantations to ensure they have the best chance of becoming functioning woodland habitats and are not created to the detriment of other wildlife habitats. The following wording should be added to point 11: “encourage natural regeneration”.	Noted. Whilst it is considered the 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
Policy JP-G7.31	The policy should also recognise that some sensitive woodlands (particularly ancient woodlands) may	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

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	benefit from reduced disturbance, particularly during the bird nesting season. Therefore, we do not agree with the wording of point 10 and suggest the following wording: "10. Improving public access to woodland and trees particularly by sustainable travel models to capture the health and wellbeing benefits whilst managing the associated pressures particularly to avoid damage and disturbance in sensitive areas;"		
Policy JP-G7.32	Welcome clause 4 of the policy however recommend this is amended to ensure targeted tree planting opportunities are informed by the LNRS. " 4. Targeting tree-planting at the areas of greatest need where the green infrastructure benefits can be maximised, whilst avoiding the loss of, or harm to, other priority habitats, including encouraging woodland planting schemes on appropriate areas of low grade agricultural land, and land in need of remediation and other areas identified in the Local Nature Recovery Strategy;"	The Local Nature Recovery Strategy is a pilot and therefore it is not appropriate to require policy in this plan to conform to it.	The Wildlife Trusts
	Other Comments		
Policy JP-G7.33	General concerns about the plan	Noted. Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Janet Millett Matthew Oxley
Policy JP-G7.34	Comment and concerns relating to specific site allocations	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere with regards to specific site allocations.	See Appendix.
Policy JP-G7.35	Concerns about loss of Green Belt	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	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]	
Policy JP-G7.36	Concerns regarding where will this urban forest and community orchards be.	See response to Policy JP-G7.16 above regarding the City Forest Park. Criterion 7 simply sets out the general promotion of community orchards. Proposals at the local level would require their own processes and consultation where appropriate.	Paul Roebuck

PfE 2021 Policy JP-G8 – Standards for Greener Places

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
Policy JP-G8.1	Support for policy.	Noted and welcomed.	Royal London Asset Management The Wildlife Trusts
Policy JP-G8.2	Support policy but need to distinguish between the different types of green infrastructure.	JP-G8 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for Standards for Greener Places encouraging the positive management of woodland. It is supported by a proportionate evidence base, see Biodiversity Net Gain [07.01.03] .	The Wildlife Trusts
Policy JP-G8.3	Strongly support the standards proposed for a “Greater Manchester Green Factor”	Noted and welcomed.	The Wildlife Trusts
Policy JP-G8.4	All JP-G Policies are in accord with our Vision for the future of The Manchester Bolton & Bury Canal.	Noted and welcomed.	Manchester Bolton & Bury Canal Society
Policy JP-G8.5	Destroying Green Belt is not valuing important landscapes. Do not destroy Green Belt to create greener spaces. This is counter to national policy.	The National Planning Policy Framework sets out a strategic policy requirement for ensuring sufficient provision for conservation and enhancement of green infrastructure. Paragraph 174a of the National Planning Policy Framework seeks to ensure that the natural environment is protected. Within the Plan this also includes reference to Policy JP-G 1 Valuing Important Landscapes. There is also a strategic case for the release of Green Belt as set out in the Green Belt Topic Paper [07.01.25] .	See Appendix.
Policy JP-G8.6	Even more emphasis is needed to protect nature and green spaces.	Paragraph 8.10 of Our Green Infrastructure Network emphasises the importance to valued landscapes and protected sites particularly for their social and economic benefits	Simon Robertson
Policy JP-G8.7	Taking Green Belt for more housing is not improving natural green space.	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 National Planning Policy Framework. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Further details in relation to the	Paul Roebuck

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in the individual allocation Topic Papers.	
Policy JP-G8.8	Access should remain open to green spaces.	As set out in Policy JP-G8, it is the intention of the 9 districts to develop standards to maximise the number of residents who have access to natural green space.	C. Axon
Policy JP-G8.9	There is not enough greenspace.	As above. See response to Policy JP-G8.8 above.	Samantha Dugmore
Policy JP-G8.10	The plans for “green factor” do not go far enough.	The National Planning Policy Framework sets out a strategic policy requirement for ensuring sufficient provision for conservation and enhancement of green infrastructure. More detail is provided in the updated National Planning Practice Guidance. Policy JP-G 8 points out that there will be a baseline expectation for the ‘Green Factor. The supporting paper ‘Guidance for Greater Manchester - Embedding Green Infrastructure principles’ [07.01.02] further explains the principles behind the ‘Green Factor’.	Janine Lawford
Policy JP-G8.11	This ‘green factor’ should be developed for inclusion within PfE itself, given that it will form part of the local Development Plan for the constituent authorities. This will provide certainty to local authorities, developers and local communities, and is essential to inform the required Viability Assessment.	This policy does not place any requirement on developers at this point. It is a statement of intent and, as stated in the final sentence, an aspiration to work towards, wherever possible.	Peel L&P Investments (North) Ltd
Policy JP-G8.12	The Greater Manchester “Green Factor” sounds like it will set a realistic baseline for minimum green space provision, which we are likely to support, however a lack of detail on the matrix to be used at this point is disappointing and it would have been better to comment on the detail sooner than at more formative stages of the Plan.	Support is noted and welcomed. The supporting paper ‘Guidance for Greater Manchester - Embedding Green Infrastructure principles’ states the Greater Manchester ‘Green Factor’ [07.01.02] is expected to be similar to the London one, however it is likely that recommended scores will differ for rural and urban areas given the nature of the city region. This will be clarified further as the Plan progresses.	Friends of the Earth
Policy JP-G8.13	Standards for greener places has not happened in Bury	Policy JP-G 8 will be implemented across all 9 boroughs. Matters relating to specific site allocations will be addressed in those areas.	Glenn Dillon
Policy JP-G8.14	Sports fields are already under threat	Noted.	Kate Tod

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G8.15	Maintenance of parks and green spaces is limited by lack of funds	This is not within the remit of the PfE Plan.	Laura Ettrick
Policy JP-G8.16	A new road is planned along with other infrastructure. A field that is used for numerous sports i.e. rounders, football a green area to stroll etc. will be gone	Not relevant to this policy	Sheila Tod
	Amendments / Additions to the Policy		
Policy JP-G8.17	Clarification required as to whether this policy applies to outdoor sport. Suggested amendment. Include a sentence at the end of the policy: The provision of outdoor sport facilities will be determined by individual or collaboration of local authorities through an evidence based rather than standards based approach.	This policy applies to natural green infrastructure. Formal outdoor sports provision would not fall within this definition.	Sport England
Policy JP-G8.18	Redrow objects to the policy, not least as there is no Plan wide viability review that demonstrates that policy requirements can be met without adversely impacting on site delivery as required by NPPF. The policy is not measurable and should be deleted from the plan as it is not considered sound. Policy JP-G 8 should be removed	This policy does not place any requirement on developers at this point. It is a statement of intent and, as stated in the final sentence, an aspiration to work towards wherever possible.	Redrow Homes Trafford
Policy JP-G8.19	This Policy should be strengthened by including reference to comprehensive compliance with Environmental and Climate Change regulations. Collaboration with residents is essential, not just in the defining of these standards, but also in monitoring compliance. These gaps mean the Policy has not been Positively Prepared and request that the wording is updated.	This policy is a statement of intent and, as stated in the final sentence, an aspiration to work towards wherever possible. The comment is noted and will be considered as the work develops further either through this plan, associated guidance or local plans. Whilst the suggestion of a policy is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G8.20	Advise the removal of the text 'wherever possible' as this can lead to the unintended consequence of encouraging developers to avoid delivery	The proposed modification is not considered necessary. Therefore, no change is proposed.	CPRE
Policy JP-G8.21	National Standards have been developed, together with Natural England's. They are the Building with Nature Standards for green infrastructure. Greater Manchester should use these standards. They have been in existence since 2019.	JP-G8 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for Standards for Greener Places encouraging the positive management of woodland. It is supported by a proportionate evidence base, see Biodiversity Net Gain [07.01.03] .	Faith Crompton
Policy JP-G8.22	If there is to be a policy then the standards should be developed and known prior to the plan being adopted, as they will have implications for development proposals. They may impact upon the amount of development that can be achieved on a site, and also viability. The impacts of imposing the standards should also be factored into the whole plan viability assessment. In the absence of any expressed standards, the policy should be deleted.	This policy does not place any requirement on developers at this point. It is a statement of intent and, as stated in the final sentence, an aspiration to work towards wherever possible.	Emery Planning
Policy JP-G8.23	The paragraphs commenting on the Integrated Assessment, confirm that this Policy has not been updated but there have been updates to other policies within the Plan to address the points raised. The words "wherever possible" need to be removed from the Policy (page 163).	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Friends of Carrington Moss
Policy JP-G8.24	This policy can be strengthened and made sound by including the following commitments: <ul style="list-style-type: none"> • reference to comprehensive compliance with Environmental and Climate Change regulations • to collaboration with residents, not just in the defining of these standards, but also in monitoring compliance • removal of the words "wherever possible" from page 163 	JP-G8 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for Standards for Greener Places encouraging the positive management of woodland. It is supported by a proportionate evidence base, see Biodiversity Net Gain [07.01.03] . It will be used to guide all development across the plan area, as appropriate. However, the relevant allocation policies in PfE detail the necessary policy framework / mitigation to ensure development coming forward at those locations will be in accordance with this policy. Further details of which can be found in	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<ul style="list-style-type: none"> • withdrawal of any Allocation that is not aligned with this Policy • the KPIs need to be updated to ensure they measure all aspects of this Policy. 	the relevant allocation topic papers. This approach is considered consistent with NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	
Policy JP-G8.25	Friends of the Earth position on net gain with respect to nature is clear with concerns over the metric being proposed; the overall trajectory of current discourse; the lack of a proximity requirement to a development site for such proposals and scepticism that developers may ultimately find themselves more able to exploit more sensitive and desirable sites without having regard to preserving sensitive assets that traditionally would have been a reason to refuse permission.	Not relevant to this policy. The matter is addressed in Policy JP-G 9 criterion C which aims to achieve a net gain in biodiversity and priority habitats.	Friends of the Earth
Policy JP-G8.26	Friends of the Earth briefing: Net Gain the new threat to nature. ³⁶ The ANGST standards for ensuring balanced access to all sizes and types of natural green space across GM is admirable and should enable a more strategic overview of deficiencies and action points. Preliminary ANGST findings suggest some interesting results. Support the approach to assess the quality as well as extent and proximity to Green space for different communities across	Support noted and welcomed.	Friends of the Earth
Policy JP-G8.27	Peel supports the recognition in Policy JP-G 9 that the quality of green infrastructure can be enhanced even if there is a reduction in the overall amount. This is consistent with the NPPF, which makes clear that the value of green infrastructure involves a balanced judgement taking into account the quality and quality of the offer	Support noted and welcomed.	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G8.28	We support the underlying intentions and approach of much of the Development Plan Document but note several instances where the designed landscape requires additional mentions.	Noted. Support welcomed. It is considered that the policies in the plan provide an appropriate framework which is in accordance with NPPF. Therefore, it is not considered appropriate to amend the policies as suggested.	Lancashire Gardens Trust
Policy JP-G8.29	We had made a detailed submission to the consultations on the GMSF and have followed the recent developments of Places for Everyone. We still have concerns at the impact on landscape character and the loss of accessible green space.	Policy JP-G 1 Valuing Important Landscapes seeks to ensure development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location, therefore reflecting local character. This is explained further in the supportive text, specifically criterion 8.2 which supports the importance of natural assets and their key qualities. See response in line JPG8.9 regarding accessible green space.	Ramblers Greater Manchester and High Peak Area
Policy JP-G8.30	With the imminent publication of the new “Streets for All” guide we would expect that the authorities of Greater Manchester would work more closely in the future with the Ramblers to identify and prioritise maintenance and investment in the rights of way network and to ensure that all new developments included positive measures to enable more people to walk and enjoy the benefits of walking.	Noted. Policy JP-P 7 Sport and Recreation criterion 6 seeks to protect and enhance the public rights of way network	Ramblers Greater Manchester and High Peak Area
Policy JP-G8.31	Support the need to provide green infrastructure on site the resolution of existing problems is not a matter which an applicant can be lawfully required to resolve and therefore disagrees with improving off site green infrastructure. A proposal can only be required to mitigate its impacts. This criterion should be deleted.	Support noted. Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Redrow Homes Trafford
Policy JP-G8.32	In this policy ensure the explanatory paragraph is amended to distinguish between the different types of green infrastructure. We suggest that the wording green infrastructure (mentioned four times in the final paragraph) is amended to reflect its function in this instance.	Green Infrastructure is defined in Policy JP-G2. The Plan needs to be read as a whole, therefore no change is considered necessary.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G8.33	Suggest the term accessible natural green space is substituted to avoid unnecessary confusion. We would also welcome changes to make the policy more effective, i.e. to specify that new development which breaches the proposed standards will not be allowed unless it would result in clear over-riding public benefits.	This policy does not place any requirement on developers. It is a statement of intent and, as stated in the final sentence, an aspiration to work towards wherever possible. Therefore it is inappropriate to specify that new development which breaches the proposed standards will not be allowed unless it would result in clear over-riding public benefits.	The Wildlife Trusts
Policy JP-G8.34	Recommend that GMCA considers adopting the Building with Nature Green Infrastructure Standards as its official “green factor” standards.	Noted.	The Wildlife Trusts
	Other Comments		
Policy JP-G8.35	Encourage supermarkets to have living roofs so birds and wildlife can nest in there	The plan supports measures such as this, in principle, to provide green infrastructure within urban areas and to contribute to mitigating against climate change.	Samantha Dugmore
Policy JP-G8.36	Although greater access is mentioned elsewhere in the document, a completely inadequate mention of maintaining the existing rights of way	See response in line JP-G8.30.	Stephen Hopkins
Policy JP-G8.37	The Plan does not mention historic designed landscapes, grouping parks with river valleys or as general heritage	Planned greenspaces such as parks and gardens and those with a historic element to them form part of the urban greenspace element of the Green Infrastructure Network and as such are covered by Policy JP-G6 Urban Green and its supporting text, particularly Paragraph 8.40.	Lancashire Gardens Trust
Policy JP-G8.38	Drop the plan.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Susan Peat
Policy JP-G8.39	Refer to submission by Bury Folk Keep it Green document and their points.	Noted.	Jill Neal
Policy JP-G8.40	Why cater for new communities when you are not catering for existing communities. Where will the provision for community orchards be?	City Forest Park is a strategic initiative being delivered by a partnership of the Forestry Commission and the City of Trees. Information can be found here . Proposals at the local level would require their own processes and consultation where appropriate.	Paul Roebuck
Policy JP-G8.41	Public rights of way should be maintained by the council so people can feel free to enjoy the areas	See response in line JPG8.30, however maintenance is out of the scope of this plan.	C. Axon

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G8.42	Plan should take into consideration current housing need	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Julie Halliwell
Policy JP-G8.43	How will Duty to Cooperate be achieved with Stockport	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Janet Taylor Matthew Oxley C Smith
Policy JP-G8.44	35% Manchester uplift for PFE	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Janet Taylor Matthew Oxley C Smith
Policy JP-G8.45	Questions regarding the legality of the plan since its change to PfE	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Matthew Oxley C Smith
Policy JP-G8.46	The consultation has been poor	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Matthew Oxley C Smith
Policy JP-G8.47	Employment provision should be identified	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Matthew Oxley C Smith
Policy JP-G8.48	Scrap the plan and only use brownfield sites	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere	Martin Rigby
Policy JP-G8.49	More equality and parity is needed for any plan to be welcomed and workable.	The Plan is supported by the Integrated Assessment [02.01.02] . See section 3 in reference to the Equality Impact Assessment	Maureen Buttle
Policy JP-G8.50	The plan should identify deficiencies and propose what will be done and where to overcome them.	It is considered that the evidence in the Plan is proportionate and robust and is therefore sound.	Anne McNally
Policy JP-G8.51	Comment relating to specific site allocations	Matter addressed elsewhere with regards to specific site allocations.	Anthony Dann Alan Sheppard Caroline Grimshaw Steven Brown

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Tina Brown Esther Chandler Glenn Dillon

PfE 2021 Policy JP-G9 – A Net Enhancement of Biodiversity and Geodiversity

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to Policy		
Policy JP-G9.1	Amend wording of point c. to: 'Achieve a net gain in biodiversity of a level required by current national policy and/or legislation'.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity which is a key objective of the Plan and NPPF.	BDW Trading Ltd Jones Homes (North West) Ltd The Wildlife Trusts Oltec Group Ltd
Policy JP-G9.2	Policy JP-G9 gives no detail as to how biodiversity will be measured for the purposes of the net gain calculation and whether this will be required on site.	Policy JP-G9 provides a high level strategic policy. Detailed matters will be a consideration at a local level through the planning application determination process or Local Plan policies.	Redrow Homes Limited BDW Trading Ltd Jones Homes (North West) Ltd
Policy JP-G9.3	Prefer the term “net gain in biodiversity” be used rather than “enhancement”, to ensure consistency with national policy, best practice guidance and the Environment Bill. It is strongly recommended that the latest version of the Defra metric (DEFRA 3.0 or later) is used.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G9.4	Recognition should be given to the fact that populations of priority species do not necessarily exclusively utilise priority habitats (for example farmland birds). We therefore suggest the following wording for point 1: “1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those habitats that support priority species”.	Whilst the suggestion is noted, the current policy wording is considered sound and should already be read as the suggested wording infers, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G9.5	Clause 4 of the policy should refer to local, as well as national, designations. We recommend: “4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international, and	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary. Local Plans also serve a function to provide local designations and as such reference within JP-G9, a high level strategic policy, is not considered necessary.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	then national and then local designations in accordance with legislation and national policy;”		
Policy JP-G9.6	Suggest amendments to point 5 to reflect the fact that some habitats are sensitive to disturbance. “5. Where appropriate facilitating greater access to nature, particularly within urban areas.”	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G9.7	Welcome the inclusion of the mitigation hierarchy in clause a) of the policy. However, the policy is less clear than the version set out in the NPPF (para. 180a) that development which fails to follow the hierarchy will be refused and that compensation is a “last resort”. This should be addressed by wording changes.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	The Wildlife Trusts
Policy JP-G9.8	The policy should make clear that decisions should “have regard to the economic and other benefits of the best and most versatile agricultural land”.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity which is a key objective of the Plan and NPPF.	Peel L&P Investments (North) Ltd
Policy JP-G9.9	Welcome the requirement in clause e) that development affecting “best and most versatile” agricultural land should be supported by appropriate evidence. There should be an equivalent clause setting out the evidence concerning ecological matters required to support applications and that this should also accord with best practice.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to ecological matters, which are further covered within local and national policy.	The Wildlife Trusts
Policy JP-G9.10	It should be clearer that the net enhancement should be widespread, substantial and measurable, and that it will be delivered both across the plan area as a whole and within local community areas.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to the measurement of net enhancement, which is further covered within local and national policy.	The Wildlife Trusts
Policy JP-G9.11	Make specific reference to ancient woodland, hedgerows, TPO's water courses, ponds, wetlands, heather mosses, peat bodies, priority species under NERC Act, birds, Red Data list.	It is considered that the greener chapter as a whole, particularly JP-G7 (trees and woodland) provides an adequate policy framework for the protection of these features. Policy JP-G9 is a high-level strategic policy relating to Biodiversity Net Gain and so no changes are proposed.	Sheila Tod Kate Tod

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G9.12	Wording should be added to make the policy subject to a viability review to ensure it does not undermine the delivery of the plan.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity which is a key objective of the Plan and NPPF. Chapter 12 of the PfE outlines how the Plan, including Policy JP-G9, will be delivered. In particular, paragraph 12.3 of the supporting text outlines the delivery mechanisms that are available to implement the plan policies and paragraphs 12.16 to 12.20 outlines the funding mechanisms.	Redrow Homes (Trafford)
Policy JP-G9.13	The following wording should be removed from the policy “Whilst off-site habitat enhancement and creation required as part of the mitigation hierarchy (or to achieve a measurable net gain in biodiversity of no less than 10%) should be local to the site regard should be had to supporting strategic biodiversity priorities and initiative”	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity which is a key objective of the Plan and NPPF.	Redrow Homes (Trafford)
Policy JP-G9.14	Do not support the use of the DEFRA metric (2012) for calculating net gains – it is still too vague and reliant on lots of elements working together (which cannot be guaranteed to do so).	The use of the metric is in line with industry and national standards in relation to the calculation of biodiversity net gain. As set out in paragraph 8.52 of the Plan, recognised metrics will be applied to new development proposals and these may be updated over time.	Friends of the Earth
Policy JP-G9.15	The quantum of development being required is seen as justification for such an approach (re major green belt release), which we object to and consideration of valid alternatives must be provided.	Justification for the policy is set out in the NPPF and the Environment Bill.	Friends of the Earth
Policy JP-G9.16	This Policy should explicitly incorporate the advice from Natural England and evidence should be provided which sets out the impact of each Allocation on local soil resources. If such evidence is not available, the Allocation should be withdrawn from PfE and handled through the Local Plan process, once the required information is available.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity, supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G9.17	Clear details of GM's irreplaceable habitats should be produced as evidence, particularly in relation to each of the Allocations set out within the Plan.	See response to row Policy JP-G9.16 above.	Friends of Carrington Moss
Policy JP-G9.18	Policy should recognise that re-wetting peatland areas and returning them to their natural state could make a significant contribution to achieving targets for reducing carbon emissions.	See response to row Policy JP-G9.16 above.	Friends of Carrington Moss
Policy JP-G9.19	<p>This policy can be strengthened and made sound by including the following commitments:</p> <ul style="list-style-type: none"> • the removal of the sentence in paragraph 8.53, page 165, that proposes development on high grade agricultural land the provision of evidence showing clear details of GM's irreplaceable habitats, particularly in relation to each of the Allocations • explicitly incorporation of the advice from Natural England in this Policy • evidence which sets out how each Allocation performs when measured against this Policy, including the impact on soil resources, BMV land and whether any high value (peaty) soils will be disturbed or damaged by the planned developments – if it is not possible to provide this information as part of this Plan, the Allocations should be withdrawn and reconsidered within Local Plans once the information is available • set out how high value (peaty) soil resources will be conserved and managed in a sustainable way • clearer links are made between this Policy and national initiatives, such as the England Peat Action Plan, and the NPPF • withdrawal of any Allocation that is not aligned with this Policy 	See response to row Policy JP-G9.16 above.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<ul style="list-style-type: none"> the KPIs need to be updated to ensure they measure all aspects of this Policy. 		
	General Comments		
Policy JP-G9.20	Support the principle of achieving a net enhancement of biodiversity.	Noted and welcomed.	Bluemantle Friends of the Earth Peel L&P Investments (North) Ltd CPRE Royal London Asset Management Manchester Bolton & Bury Canal Society
Policy JP-G9.21	Support for part of the strategy for enabling nature recovery and the designation of the NIA (Nature Improvement Area).	Noted and welcomed.	Friends of the Earth
Policy JP-G9.22	The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
Policy JP-G9.23	The policy assumes biodiversity and development are compatible.	Noted.	Anne McNally
Policy JP-G9.24	Concern regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA.	<p>No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity, supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26].</p> <p>Paragraphs 8.28 of the supporting text to Policy JP-G4 outlines that several restoration projects are underway within the Plan area, which will not only have major nature</p>	Natural England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>conservation benefits, but could also make a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon.</p> <p>The requirements of Policy JP-G4 should be read in conjunction with the policies in the PfE that deal with climate change, which are JP-S2 Carbon and Energy, JP-S3 Heat and Energy Networks, JP-S4 Resilience, JP-S5 Flood Risk and the Water Environment and JP-S7 Resource Efficiency.</p>	
Policy JP-G9.25	The Policy proposes to denigrate these essential environments, despite their prioritisation in the Government's 25 year environment plan and the recently published England Peat Action Plan	We disagree with this suggestion. Policy JP-G9 provides for the safeguarding, restoration and sustainable management of our most valuable soil resources to ensure the protection of peat-based soils and safeguards against the loss of wildlife habitats. Paragraph 8.48 of the supporting text outlines that a key priority of the Plan is to achieve a major net enhancement of biodiversity value and improve access to nature.	Friends of Carrington Moss
Policy JP-G9.26	A green project would help developers meet their new obligations in the Environment Bill. The Mayor should clarify if this is his intent.	The Plan is not the Mayor's Plan, it is a joint development plan document providing a high level strategic planning framework in line with NPPF. Additional local projects would be a matter for consideration at the local district level.	Home Builders Federation
Policy JP-G9.27	It must also be recognised that the majority of this land is managed by farmers who use it to produce food as well as other outputs from the land. It is important that this area is recognised and retained as a productive as well as a natural landscape. Farmers and land managers are uniquely placed to help the Council achieve many of its objectives around biodiversity.	<p>No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity, supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26].</p> <p>It is acknowledged the implementation of any policies would need to use engagement with land owners and managers.</p>	The National Farmers Union
Policy JP-G9.28	Adopting a 'one size fits all' approach to biodiversity enhancement and geodiversity/ habitat management also carries its own challenges as it fails to take account of local circumstances	<p>No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity, supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26].</p> <p>Paragraph 1.57 of the PfE tells us that all policies in the plan are strategic policies and that district Local Plan can set out more detailed policies reflecting local circumstances.</p>	Taylor Wimpey
Policy JP-G9.29	The viability implications of the policy have not been appropriately accounted for in the Viability Assessment which accompanies the Plan.	<p>A strategic viability assessment, [03.03.01] 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</p>	Taylor Wimpey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		whether particular circumstances justify the need for a viability assessment at the application stage.	
Policy JP-G9.30	The policy does not take account of reasonable alternatives nor is it based on proportionate evidence. The requirements are almost impossible to demonstrate compliance with.	No change is considered necessary. Policy JP-G9 is considered to be consistent with NPPF and provides an appropriate strategy to biodiversity and geodiversity, supported by a proportionate evidence base summarised in the Natural Environment Topic Paper [07.01.26] .	Taylor Wimpey
Policy JP-G9.31	There is no basis for a 10% requirement for Biodiversity Net Gain currently, until the Environment Bill is enacted.	The Environment Bill received royal assent on 9 November 2021. Additionally, the NPPF sets out a clear expectation of biodiversity net gain within new developments. Policy JP-G9 is therefore considered to be consistent with NPPF and no change is considered necessary.	Redrow Homes (Lancashire) Redrow Homes (Trafford) Oltec roup Ltd Redrow Homes Limited BDW Trading Ltd Jones Homes (North West) Ltd Taylor Wimpey
	Other		
Policy JP-G9.32	Biodiversity cannot be enhanced whilst destroying the Green Belt. Concerns regarding development on Green Belt.	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] A key priority of policy JP-G9 is to achieve a major net enhancement of biodiversity value.	See Appendix.
Policy JP-G9.33	The financial implications of satisfying these objectives has not been correctly considered. The policy will be expensive and also bring a high cost to the climate and to the health of local residents.	Chapter 12 of the PfE outlines how the Plan, including Policy JP-G9, will be delivered. In particular, paragraph 12.3 of the supporting text outlines the delivery mechanisms that are available to implement the plan policies and paragraphs 12.16 to 12.20 outlines the funding mechanisms.	Taylor Wimpey Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G9.34	Questions regarding the legality and soundness of plan if GMSF and PfE can be regarded the same.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	John Anderson Collette Gammond Matthew Oxley
Policy JP-G9.35	The Plan / policy does not take Covid and Brexit into account.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Collette Gammond Matthew Oxley C Smith
Policy JP-G9.36	The consultation process has been poor and onerous.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Collette Gammond Matthew Oxley Alison Doherty C Smith

PfE 2021 Policy JP-G10 – The Green Belt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Additions / Amendments to Policy		
Policy JP-G10.1	The policy is vague in terms of protection afforded to Green Belt. Clearer and more honest numbers on how much Green Belt is under threat should be provided.	Paragraphs 8.54-8.62 of the supporting text to the policy sets out the level of protection that will be afforded to the Green Belt, along with the policy text and national policy. Figure 6.10 of the Green Belt Topic Paper [07.01.25] provides detailed figures on the proposed allocations and the amount of Green Belt either released or retained as part of each allocation. Figures relating to current and proposed Green Belt are set out in paragraph 6.20 – 6.22 of the Topic Paper.	Brian Hulme
Policy JP-G10.2	The policy should recognise that in accordance with national planning policy, certain other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include mineral extraction.	No change is considered necessary. Policy JP-G10 is considered to be consistent with NPPF and provides an appropriate green belt strategy. National planning policy in relation to Green Belt still applies and does not need to be repeated here.	See Appendix.
Policy JP-G10.3	Green belt release is based on an insufficient scale of development and site selection process should be more transparent - exceptional circumstances exist for more Green Belt to be released in order to fully meet objectively assessed needs.	As set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt [07.01.25] as well as the 2016 GM Green Belt Assessment [07.01.04] and 2020 GM Green Belt Study [07.01.07 – 07.01.24], the scale of development proposed appropriately meets the Local Housing Need and Objectively Assessed Need for Employment. A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning the Green Belt boundary will endure beyond the plan period. This is supported by a proportionate evidence base and no changes are considered necessary.	See Appendix.
Policy JP-G10.4	The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.	NPPF paragraphs 78–80 and 84-85 deal with the national policy approach to rural housing and supporting the rural economy. Whilst these issues may be guided by policy in individual Local Plans, it is not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. The current greener chapter policies are considered sound, therefore no changes or further policies are considered necessary.	Woodford Neighbourhood Forum

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G10.5	The plan should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.	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 the 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 and housing land needs and supply, and the requirement for the timing of these can be found in the Employment Topic Paper [05.01.04] and 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] .	Woodford Neighbourhood Forum
Policy JP-G10.6	A review mechanism should be built in to only include greenbelt at a later stage if proven necessary.	Please see response to Policy JP-G10.5. Delivery rates will be reviewed regularly as part of the Housing Delivery Test process.	See Appendix.
Policy JP-G10.7	The PFE should clarify whether any further non-strategic changes to Green Belt boundaries will take place through emerging Local Plans.	It is not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. This approach is considered consistent with NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'.	Emery Planning
Policy JP-G10.8	The policy should include more detail on what would be considered inappropriate development in the Green belt.	Paragraphs 147–151 of the NPPF provide policy on proposals affecting the Green Belt as well as identifying appropriate and inappropriate development. Whilst the suggestion is noted, the current wording is considered sound and therefore no changes are considered necessary.	Friends of the Earth
Policy JP-G10.9	There should also be a clear expectation and level of guidance set out in this policy to confirm that there will be a requirement to further review Green Belt boundaries as part of any future Local Plan process associated with the respective authorities in order to: Address any unmet housing and employment needs evident when preparing and examining Local Plans; Address longer term development requirements through the identification of Safeguarded Land; and Undertake a detailed boundary review to determine if previously identified Green Belt boundaries are still	Please see response to Policy JP-G10.7 above. Policy JP-G11 relates to safeguarded land. The process of plan review will be used to monitor local housing need up to 2037 and if necessary a formal review will be undertaken outside of the statutory timetable (para 1.10).	Highgrove Strategic Land Ltd Rowland Homes Ltd Miller Homes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	reflective of the existing urban form around Greater Manchester.		
Policy JP-G10.10	All of the respective authorities, will need to identify additional safeguarded land now or through the Local Plan process to satisfy the requirements of paragraph 143c of the NPPF. Moreover, the PFE plan evidence base has not sought to scrutinise the existing boundaries of the Green Belt to see if they need any minor alterations following changes that may have occurred to the existing urban form since a previous Green Belt review was undertaken. Instead, the evidence base has focused on what ranking/contribution larger Green Belt parcels make to the Green Belt.	Issues relating to safeguarded land are dealt with under Policy JP-G11. A proportionate and robust green Belt assessment process has been undertaken as set out in the Green Belt Topic Paper [07.01.25] .	Highgrove Strategic Land Ltd
Policy JP-G10.11	PfE should ensure that their Green Belt Review and corresponding Assessment focuses on specific sites, especially those submitted as part of the Call for Sites process, in the interests effective and positive planning.	Please see response to Policy JP-G10.10.	Crossways Commercial Estates Ltd
Policy JP-G10.11	The fixation with the commitment to "no net Green Belt loss" is wrong and misguided / superfluous. It reduces flexibility, by imposing greater policy tests to be overcome should this land be required for development in the future.	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. Steps have been taken to minimise net loss of Green Belt in the plan. The Green Belt Topic Paper [07.01.25] sets out the local level case for exceptional circumstances and links to evidence that demonstrates, proportionately, that the amount of sites proposed for allocation is suitable.	Seddon Homes Ltd Seddon Homes Ltd GLP Ltd
Policy JP-G10.12	This policy is superfluous as it adds nothing more to national policy. The policy repeats what is in national policy and guidance. We recommend that it is deleted. The diagram showing the extent of the green belt is needed and the supporting text should be retained.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Home Builders Federation

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G10.13	Wording of policy repeats NPPF and could be shortened / simplified.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	Aviva Life & Pensions UK Peel L&P Investments (North) Ltd Peel L&P Investments (North) Ltd Taylor Wimpey
Policy JP-G10.14	The wording of the policy is unclear - once sites are allocated for development they are removed from the Green Belt and therefore policy tests relating to the Green Belt no longer apply.	The current policy wording is considered sound and clear, Some of the allocations include retained Green Belt within their boundaries. Planning applications coming forward on the proposed site allocations must comply with relevant allocation policies otherwise they would not accord with policy and represent a departure from a plan. Green Belt will still cover over 45% of the land area covered by the plan and Green Belt policies will still apply to protect these sites from inappropriate development. No changes are considered necessary.	Northern Gateway Development Vehicle LLP (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Redrow Homes Trafford Taylor Wimpey
Policy JP-G10.15	Final paragraph should be deleted in particular where it says that green belt policies will be 'strictly' applied. The request to treat allocated sites as Green Belt in some circumstances is superfluous and unnecessary.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary.	See Appendix.
Policy JP-G10.16	The amount of land that needs to be allocated for development (housing) has been under estimated whilst the supply of new homes delivered from other identified sources has been over estimated / fully considered the extent to which those sources are likely to meet full OAN for the range, type and tenure of homes needed.	Please see response to Policy JP-G10.3 above.	Peel L&P Investments (North) Ltd
Policy JP-G10.17	The amount of Green Belt that will be lost should be stated in the policy.	Whilst the suggestion is noted, the current policy wording is considered sound, therefore no change is considered necessary. The Green Belt Topic Paper [07.01.25] also provides figures on the amount of lost, proposed and retained Green Belt.	Friends of Carrington Moss
Policy JP-G10.18	The policy needs to be amended to fully focus on the protection and enhancement of the Green Belt.	The policy and its supporting text is considered to sufficiently outline the strategic approach to the protection and enhancement of Green Belt in the city region. No changes are considered necessary.	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
Policy JP-G10.19	Support changes to Green Belt boundaries to accommodate development needs - agree with exceptional circumstances case.	Noted and welcomed.	See Appendix.
Policy JP-G10.20	Support for additions to the Green Belt.	Noted and welcomed.	Ceridwen Haslam Faith Crompton
Policy JP-G10.21	There are not exceptional circumstances to justify proposed additions to the Green Belt. The material put forward to justify Green Belt additions misapplies national policy, fails to consistently apply any objective planning judgement to whether exceptional circumstances exist, fails to assess whether proposed additions could supply development and is motivated by the erroneous concept of 'net loss'.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] [paragraph 6.28 – 6.31] provides appropriate justification for the Green Belt Additions.	Peel L&P Investments (North) Ltd Hollins Strategic Land
Policy JP-G10.22	Object to the loss of good quality agricultural land - should be safeguarded for future food production.	Paragraphs 1.47 and 1.48 of the plan set out the consideration of the Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Whilst the suggestion is noted, the policy is considered sound and no changes are considered necessary.	See Appendix.
Policy JP-G10.23	Smaller to medium scale sites should be released to better enable housing delivery within the first five to ten years.	See response to JP-G10.5 above.	Metacre Ltd
Policy JP-G10.24	Over-reliance on brownfield land within Manchester and Salford will not result in the housing needs of the whole region being met in the right places. The reduction in the amount of land proposed to be removed from the Green Belt has decreased over subsequent iterations of the plan which is a something that could significantly constrain the ability of the nine GM authorities to meet housing needs and support	See response to Policy JP-G10.3 above. Safeguarded land is covered under policy JP-G11.	Murphy Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	economic growth aspirations. Change needs to be made in regard to the level of Green Belt release. Also question what consideration has been given to the need to release land from the Green Belt to meet longer term development needs beyond the plan period. Such land would need to be safeguarded, but there is no discussion in the evidence about whether any land needs to be safeguarded.		
Policy JP-G10.25	Do not approve of green belt additions when more is being taken away for development.	See response to JP-G10.21 above.	Simon Robertson Louise Daveron Faith Crompton Maika Fleischer Elaine Robertson Jean Markham
Policy JP-G10.26	The loss of green belt between districts is not proportional.	Paragraphs 1.47 and 1.48 of the plan set out the consideration of the Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. The evidence base outlined the strategic exceptional circumstances is considered proportionate and robust therefore no changes to the policy are considered necessary.	Steven Brown Tina Brown Metacre Ltd
Policy JP-G10.27	Welcome the reduction in green belt loss from previous iterations of the plan.	Noted.	Save Greater Manchesters Green Belt (SGMGB) Friends of the Earth Peter Thompson
Policy JP-G10.28	Need for Green Belt release should be reassessed using post-brexite / covid data.	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] .	Janet Taylor CPRE Carol Burke
Policy JP-G10.29	Concerns regarding evidence base (site selection paper and Green Belt assessment). Independent	It is considered that a proportionate evidence base has been provided to support the policy, it can be found here: Green Belt Topic Paper and Case for Exceptional	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	reports should be undertaken and additional evidence prepared.	Circumstances to amend the Green Belt [07.01.25] as well as the 2016 GM Green Belt Assessment [07.01.04] and 2020 GM Green Belt Study [07.01.07 – 07.01.24] .	
Policy JP-G10.30	Objection to building on Green Belt / loss of Green Belt for development - Green Belt should be protected / more should be done to protect. Building on green belt will contradict the purposes of the green belt. No exceptional circumstances have been demonstrated and there is not enough housing need for green belt release. Plans to build on Green Belt go against local community wishes.	Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. This is detailed further in the Green Belt Topic Paper [07.01.25] which sets out the case for exceptional circumstances at Appendix 1.	See Appendix.
Policy JP-G10.31	Brownfield areas should be developed ahead of Green Belt. These areas would benefit from regeneration. Green Belt should only be developed once brown belt resources have been exhausted.	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.	See Appendix.
Policy JP-G10.32	Green Belt land is important for wildlife and building on it will increase flooding and impact on landscape character.	Policies JP-G1 through to JP-G9 seek to support the important role of our natural assets by valuing the special qualities and key sensitivities of our landscape, protecting and enhancing green and blue infrastructure, and seeking an overall enhancement of biodiversity and geodiversity.	See Appendix.
Policy JP-G10.33	To build on green belt merges areas and denies individuality. It loses access to green spaces, creates more car pollution due to insufficient transport network and building more houses in green belt areas does not guarantee more employment all it does is cause people to travel for work	Noted. Please see response to JP-G10.30 above.	Susan Peat
	Other Comments		
Policy JP-G10.34	Concerns about the consultation process and lack of public understanding of the legal process.	Comment is not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Suzette Howard Alan Sheppard John Ackerley Roz Kaufman

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G10.35	Mapping should mention the percentage of green spaces already lost to development in recent years.	Comment is not relevant to the content of the Green Belt policy.	Heather Bebbington Pugh
Policy JP-G10.36	Concerns regarding the legal process undertaken including duty to cooperate.	Comment is not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	Matthew Oxley Richard Lucas
Policy JP-G10.37	Comments regarding green belt addition at Walken - site should not be added to the green belt as it does not comply with the five purposes of Green Belt set out in NPPF.	Please see response to JP-G10.21 above and individual district responses to Green Belt additions.	Casey Group
Policy JP-G10.38	Comments regarding GBA01 (Ditchers Farm) - proposal fails the test of soundness and exceptional circumstances are not demonstrated.	Please see response to JP-G10.21 above and individual district responses to Green Belt additions.	Hollins Strategic Land LLP

PfE 2021 Policy JP-G11 – Safeguarded Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Amendments / Additions to the Policy		
Policy JP-G11.1	The identification of a number of smaller sites as safeguarded land in each authority would offer the potential to quickly address shortfalls in the supply of units through a Local Plan Review. Smaller sites with the capacity to deliver up to 500 units would come forward sooner and could contribute towards completions in the first 5 years and a policy trigger should be included within the Plan which allows Safeguarded Sites to come forward when housing land supply issues are experienced.	A 16% margin of flexibility has been identified in the housing land supply see Housing Topic Paper [06.01.03] . Whilst the margin of flexibility will ensure a sufficient choice of sites is available to meet the identified housing needs, in line with the evidence base, it will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework, it is considered that the plan provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF.	Housebuilding Consortium
Policy JP-G11.2	Land adjacent to the proposed HS2 Airport Station should not be safeguarded.	This land will help to meet longer term development needs which cannot be met within the urban areas or on previously developed land. As set out in Policy JP Allocation 3.2 (Timperley Wedge) any future allocation is subject to an assessment that the land directly contributes to the Greater Manchester HS2 / NPR Growth Strategy and it should only be developed after completion of development set out in the Timperley Wedge masterplan/SPD and following the delivery of HS2 Airport station. Should a HS2 Airport station not be developed, the land will return to Green Belt following a future Plan review. This approach is in line with the economic strategy and safeguarding directions issued by the Secretary of State.	CPRE The Wildlife Trusts
Policy JP-G11.3	An insufficient amount of safeguarded land has been provided. No sites have been safeguarded for housing. A greater range of sites should be identified and at least 15 years supply.	Please see response to Policy JP-G11.1.	See Appendix.
Policy JP-G11.4	PfE should undertake an objective assessment of the need for safeguarded land having regard to development needs. It should identify and allocate suitable safeguarding sites subject to policy protection	As per the response to Policy JP-G11.1 above, an objective and thorough assessment of housing need across the region over the plan period has been undertaken and an appropriate buffer identified. Safeguarded land identified at the HS2 Growth Area has been provided policy protection and the circumstances in which it could be brought forward clearly outlined (see response to Policy JP-G11.2 above).	Peter and Diane Martin

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	and sets out the circumstances in which they could be brought forward		
Policy JP-G11.5	There is no consistency between authorities on how safeguarded sites / sites to be delivered beyond the current plan period are being identified. If additional sites are not identified now, further amendments will be required at the end of the Plan period.	A detailed and robust site selection process has been undertaken to identify sites across the region as set out in the Site Selection evidence base papers [03.04.1 – 03.04.11] . This approach is considered clear, consistent and transparent. Please also see response to Policy JP-G11.1 above.	Housebuilding Consortium Taylor Wimpey
Policy JP-G11.6	This policy should make it clear that the districts can safeguard land through their Local Plans to address longer term needs.	National policy indicates at paragraph 143 of the NPPF that, where necessary, local authorities should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet long-term development needs stretching well beyond the plan period. Notwithstanding this, it is not necessary or appropriate to determine the scope of local plans in the PfE Plan. That will be a matter for individual districts to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities to set out more detailed policies for specific areas, neighbourhoods or types of development.	Rowland Homes Ltd
Policy JP-G11.7	Given that there are suitable development opportunities within the current Green Belt at Chew Moor Lane in Westhoughton and North of Langley Lane in Middleton, as identified elsewhere within our representations, safeguarding should be considered if they are not brought forward for development at the present time.	No change is considered necessary. As stated in the Housing Topic Paper [06.01.03] an appropriate buffer has been applied to the land supply and no further safeguarding is considered necessary.	Persimmon Homes North West
Policy JP-G11.8	No figures have been provided which confirm: the expected housing delivery rates of the PFE allocations; the level of housing delivery expected beyond the plan period; or how future development needs beyond the plan period will be met. The other sources of supply listed are not safeguarded land, they are a mix of existing Green Belt allocations and urban sites.	As set out in the Housing Topic Paper [06.01.03] the Plan includes stepped targets over the plan period and has identified potential supply both within the plan period and post-2037, as well as delivery trajectories and providing information along with the SHMA [06.01.02] on past delivery rates. The work of each of the local planning authorities in terms of housing delivery will be key to ensuring that these stepped changes in delivery rates are achieved, and these will be reviewed regularly as part of the Housing Delivery Test process. An appropriate buffer has been applied to the land supply to meet future development needs beyond the plan period through a mix of allocations with capacity beyond the plan period and safeguarded land.	Highgrove Strategic Land Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G11.9	Other sources of supply listed are not safeguarded land, they are a mix of existing Green Belt allocations and urban sites. Theoretically, these sources could be delivered within the current plan period, rather than being protected from delivery beyond the plan period (i.e. post 2037) as required by the NPPF, so should not be allowed to off-set safeguarded land provision.	The NPPF sets out that safeguarded land should be identified where necessary. An appropriate buffer has been applied to the land supply and the Plan allocates a number of sites for development for both new homes and employment that have capacity for development beyond the plan period. Section 6 of the Housing Topic Paper [06.01.03] sets out potential supply post-2037 between the Districts.	Rowland Homes Ltd
Policy JP-G11. 10	The KPIs at page 394 of the main document are particularly weak in relation to our green credentials. This policy can be strengthened and made sound by including the following commitments: <ul style="list-style-type: none"> • withdrawal of any Allocation that is not aligned with this Policy • the KPIs need to be updated to ensure they measure all aspects of this Policy. 	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.	Friends of Carrington Moss
Policy JP-G11.11	Policy JP-G11 is unclear as: It states (third bullet) that development will only be permitted where it would not prejudice the future use of the land, but without giving any indication of what the future use of the land may be. The supporting text (para. 8.66) refers to safeguarded sites in plural whereas policy JP-G11 itself only lists one site.	Comment regarding plural reference to 'safeguarded sites' is noted and whilst it is considered that this proposed wording could improve the clarity of the supporting text, it is not considered to be a soundness issue and therefore no change if proposed. Policy JP Allocation 3.2 provides further detail on the safeguarded land proposed at the HS2 Growth Area at points 47 – 50.	The Wildlife Trusts
Policy JP-G11.12	Include Safeguarded Land in respect of the A57 bypass to build in flexibility over delivery in the interests of effectiveness and positive plan making.	See response to JP-G11.7.	Landowners of Holme Valley
Policy JP-G11. 13	Policy JP-G 11 should be amended to include a time limit for the review of Plan performance against housing targets, which should be no later than five years after adoption. A partial review of the identified Safeguarded Sites should be instigated, which could take place on a District by District basis. The timing of	The process of plan review will be used to monitor local housing need up to 2037 and, if necessary, a formal review will be undertaken outside of the statutory timetable. Housing delivery rates will also be regularly reviewed as part of the housing delivery test process. Paragraph 1.10 of the Plan also sets out that, whilst it is recognised that the country is still in a state of flux, it is very clear that to delay the production of a strategic plan of this nature further could have a negative effect on the proper planning of the nine boroughs	Redrow Homes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	review should also take into account the 5 year housing land supply calculation for the relevant District.	and therefore their recovery. Instead, it is considered appropriate to proceed as a plan of the nine boroughs, excluding Stockport, but to use the process of plan review to monitor the situation and if necessary to undertake a formal review outside of the statutory review timetable.	
Policy JP-G11.14	Concerns regarding the delivery of allocations in full and the potential for these to result in lower overall housing yield, therefore further safeguarded land should be identified.	Please see response to JP-G11.1.	Redrow Homes
Policy JP-G11.15	Policy JP-G 11 should include a trigger linking to allocation policies that state safeguarded land will only come forward following the delivery of HS2.	Whilst it is considered linking the policy to Policy JP Allocation 3.2 and reference contained therein to safeguarded land only coming forward following the delivery of a HS2 Airport Station, this is not considered to be a soundness issue, therefore no change is proposed.	Royal London Asset Management
Policy JP-G11.16	Safeguarded land may be in an area that is at risk of flooding from the public sewer. It will therefore be critically important that any proposals for development of the safeguarded land include early engagement with United Utilities prior to any masterplanning process to ensure development is not located in an area at risk of flooding. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances to ensure the most flood resilient solution is achieved.	Noted.	United Utilities Group PLC
Policy JP-G11.17	The policy should put a greater emphasis on community opinion.	Noted however no change is considered necessary. JP-G11 is a strategy planning policy, consistent with NPPF.	Linus Mortlock
Policy JP-G11.18	Provide a map to the safeguarded land.	Land identified as safeguarded land is identified on the allocation map for Policy JP Allocation 3.2 (Timperley Wedge).	Irene Thomson
Policy JP-G11.19	The policy should also make reference to the safeguarding of mineral resource 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, no change to Policy JP-G11 is considered necessary.	Church Commissioners for England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G11.20	Safeguarded land should be kept safeguarded in perpetuity.	The approach to safeguarded land set out in Policy JP-G11 is consistent with paragraph 143 of the NPPF which states that planning permission for the permanent development of safeguarded land should only be granted following an update to the plan which proposes the development.	Joanne Maffia
	General Comments		
Policy JP-G11.21	Support for the policy.	Noted and welcomed.	Highgrove Strategic Land Ltd Bellway Homes Ltd Manchester Bolton & Bury Canal Society
Policy JP-G11.22	Concerns regarding the robustness of the Green Belt Review and Site Selection Methodology and identification of sites in the evidence base in respect of identifying safeguarded land.	It is considered that a proportionate evidence base has been provided to support the policy. It can be found here: Green Belt Review [07.01.04] & Site Selection [03.04.01] .	Peel L&P Investments (North) Ltd Housebuilding Consortium
Policy JP-G11.23	Cheshire East did not have enough safeguarded land and further work had to take place.	No change is considered necessary. Policy JP-G11 is considered to be consistent with the NPPF and provides an appropriate strategy to safeguarded land.	Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd
Policy JP-G11.24	PfE actually proposes to add land to the GB which will act as a further constraint on future supply.	As part of the PfE preparation, 674.6 hectares of land has been identified on 49 sites outside of the Green Belt which are judged to be suitable for inclusion within the Green Belt boundary. Justifications for each of the proposed additions against all five of the policy requirements are included at Appendix 3 of the Green Belt Topic Paper [07.01.25] and make the case for their increased protection under Green Belt.	Highgrove Strategic Land Ltd Wainhomes (NW) Ltd
Policy JP-G11.25	The PfE appears to be claiming that some of the larger allocations which will deliver units beyond the plan period are effectively Safeguarded Land but this does not represent a robust or justified approach.	Only one allocation (JPA 3.2) has any safeguarded land within it. Please see response to Policy JP-G11.9. The policy is considered to be consistent with the NPPF and provides an appropriate strategy to safeguarded land.	Housebuilding Consortium
Policy JP-G11.26	Safeguarded land should be identified to establish Green Belt boundaries that will endure well beyond 2037. The Green Belt Topic Paper fails to address how development needs will be met beyond the plan period without additional safeguarded land.	Please see response to JP-G11.1.	Persimmon Homes North West

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G11.27	There will be a need for further release of land requiring a review of Green Belt boundaries before the end of the plan period.	Please see response to JP-G11.1	Peel L&P Investments (North) Ltd Milnes Gaskell Estate Highgrove Strategic Land Ltd NPL Group PD Northern Steels Wainhomes (NW) Ltd Housebuilding Consortium
	Other		
Policy JP-G11.28	Objection to Green Belt removal. There should be a brownfield first approach. Save the Green Belt and leave it alone and protect the local wildlife and local biodiversity.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] .	SRH Properties Ltd
Policy JP-G11.29	Insufficient information for citizens/residents living in or near Green Belt to fully understand the consequences. Engage more with affected residents.	Comments regarding the consultation process are not relevant to the context of the Greener Chapter. Matter addressed elsewhere.	Brian Hulme Karen Cornwall
Policy JP-G11.30	Unnecessary policy and will only increase opportunities for developers whilst destroying Green Belt.	Policy JP-G11 is considered to be consistent with NPPF and provides an appropriate strategy to safeguarded land.	Alan Sheppard
Policy JP-G11.31	Concerns regarding 35% Manchester uplift for PFE.	Not relevant to this policy. Matter addressed elsewhere.	Collette Gammond Matthew Oxley C Smith
Policy JP-G11.32	The data used in the plan is outdated for housing need.	Not relevant to this policy. Matter addressed elsewhere.	Collette Gammond Matthew Oxley C Smith
Policy JP-G11.33	Greater employment provision should be identified.	Not relevant to this policy. Matter addressed elsewhere.	Collette Gammond Matthew Oxley C Smith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JP-G11.34	Where will the urban forest be in relation to City Centre?	Not relevant to this policy. Matter addressed elsewhere	Paul Roebuck
Policy JP-G11.35	Where will the provision of community orchards be and who will own, run and benefit?	Not relevant to this policy. Matter addressed elsewhere.	Paul Roebuck
Policy JP-G11.36	Landbanking will go to developers.	Comment not relevant to the content of the Greener Chapter. Matter addressed elsewhere.	David McLaughlin
Policy JP-G11.37	The Plan does not do enough to protect the environment.	Noted. PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base.	Ann Guilfoyle
Policy JP-G11.38	Manchester will play a part in the level up agenda, therefore more housing and employment development will be needed to become a global city, beyond the plan period.	Please see response to Policy JP-G11.1.	Aviva Life & Pensions UK

Appendix

Respondents to PfE 2021 Policy JP-G1 – Valuing Important Landscapes

Row	Respondent name(s)
Policy JP-G1.16	Woodford Neighbourhood Forum Friends of the Earth Peel L&P Investments (North) Ltd Royal London Asset Management Friends of Carrington Moss Manchester Bolton & Bury Canal Society Greater Manchester Housing Providers
Policy JP-G1.22	Janet Alldred Paul Roebuck Janet Millett Trevor Widdop Helen Skidmore C. Axon Michael Hullock E Bowles Samantha Dugmore Julie Halliwell David Hawes Janet Aunins Joanne Maffia Gary West Alan Bayfield Barbara Keeley Esther Chandler Brian Saffer David McLaughlin Craig Smith C Smith Mark Haynes Susan Evans Martha Hughes Patricia Fletcher Chris Green Margaret Blakeley Roy Chapman Barbara Lloyd

Respondents to PfE 2021 Policy JP-G2 – Green Infrastructure Network

Row	Respondent name(s)
Policy JP-G2.16	Woodford Neighbourhood Forum Bluemantle Redrow Homes Friends of the Earth Peel L&P Investments (North) Ltd Royal London Asset Management Friends of Carrington Moss Manchester Bolton & Bury Canal Society The Wildlife Trusts Greater Manchester Housing Providers Liverpool City Region Combined Authority
Policy JP-G2.30	Paul Roebuck Louise James Brian Hulme Lesley Heneghan John Roberts Gary West Gillian Boyle Alan Bayfield David McLaughlin Craig Smith C Smith Chris Waterfield Chris Green Christopher Russell Barbara Lloyd

Respondents to PfE 2021 Policy JP-G4 – Lowland, Wetlands and Mosslands

Row	Respondent name(s)
Policy JP-G4.26	Michael Young Deborah Foulkes Edward Beckmann David McLaughlin Glenn Dillon Simon Robertson Jane Barker
Policy JP-G4.32	Peter Stanyer Mike Seer Peter Stratton Paul Roebuck Colin Walters E Bowles

	Samantha Dugmore Kim Scragg Julie Halliwell Joanne Maffia Barbara Keeley Steven Brown Tina Brown Janine Lawford Julie Jerram Karen Cornwall Miriam Latham Ann Guilfoyle Jacqueline Charnock Carl Southward Woodford Neighbourhood Forum
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Respondents to PfE 2021 Policy JP-G5 – Uplands

Row	Respondent name(s)
Policy JP-G5.6	Mike Seer Peter Stratton Andrew Mair Kim Scragg Gary West Martin Rigby Karen Cornwall Ann Guilfoyle Jane Barker
Policy JP-G5.39	Linus Mortlock Janet Millett Andrew Mair Julie Halliwell Joanne Maffia Gary West Steven Brown Tina Brown David McLaughlin Glenn Dillon Stephen Cluer Paul Crowther

Respondents to PfE 2021 Policy JP-G6 – Urban Green Space

Row	Respondent name(s)
Policy JP-G6.1	Peter Stanyer Mike Seer Colin Walters Kim Scragg Joanne Koffman Glenn Dillon

	Ann Guilfoyle Carl Southward
Policy JP-G6.51	Anthony Dann Paul Roebuck Chris Procter Malcolm Hields Louise Bolotin Peter Christie John Anderson Patricia Cooke Neil Campbell E Bowles Alan Sheppard Barbara Keeley Steven Brown Tina Brown Sheila Tod Martha Hughes Miriam Latham Stephen Cluer Jacqueline Charnock Christopher Russell Barbara Lloyd

Respondents to PfE 2021 Policy JP-G7 – Trees and Woodland

Row	Respondent name(s)
Policy JP-G7.1	Peter Christie C. Axon Simon Robertson Woodford Neighbourhood Forum Friends of the Earth Peel L&P Investments (North) Ltd Royal London Asset Management The Wildlife Trusts
Policy JP-G7.34	Kay Bruce Colin Walters C. Axon Samantha Dugmore Sarah Burlinson Lesley Heneghan Chris Green Paul Crowther Barbara Lloyd Laura Etrick
Policy JP-G7.35	Peter Stanyer Mike Seer Anthony Dann Paul Roebuck Suzette Howard

	Andrew Mair Graham White Sarah Burlinson Kim Scragg Caroline Grimshaw Alan Bayfield Janine Lawford Ann Guilfoyle Halina Clowes Roy Chapman
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Respondents to PfE 2021 Policy JP-G8 – Standards for Greener Places

Row	Respondent name(s)
JP-G8.5	Peter Stanyer Mike Seer Trevor Thomas Peter Stratton Colin Walters Peter Christie Kim Scragg Julie Halliwell Martin Rigby

Respondents to PfE 2021 Policy JP-G9 – A Net Enhancement of Biodiversity

Row	Respondent name(s)
Policy JP-G9.32	Paul Roebuck Suzette Howard Peter Christie Samantha Dugmore Sarah Burlinson Janine Lawford Laura Charlotte Alison Doherty

Respondents to PfE 2021 Policy JP-G10 – The Green Belt

Row	Respondent name(s)
Policy JP-G10.2	Mineral Products Association Bowdon Rugby Club Miri Roshni W R Halman J M Gibney C L Halman F I Carless Bluemantle Milnes Gaskell Estate NPL Group

	Countryside Properties LLP, Casey Group Ltd and Wain Homes
Policy JP-G10.3	Aviva Life & Pensions UK Miller Homes Persimmon Homes North West Morris Homes (North) Ltd Morland Capital Partners No.1 Ltd Stephen Cluer Redcliff Estates Crossways Commercial Estates Ltd Murphy Group Seddon Homes Ltd HIMOR Group Hollins Strategic Land Hollins Strategic Land Wainhomes (NW) Ltd Taylor Wimpey
Policy JP-G10.6	Alexandra Cluer Andrea Keeble Lisa Mather Deborah Morgan Peter Mather Susan Higgins Juliet Eastham Oscar Majid Yvonne Robinson Stuart Johnstone Susan Fleming Andrew Fleming Catherine Schofield Tom Wood Michelle Mcloughlin Joan Glynn Viv Barlow Jacqueline Majid S Stratton Hazel Keane John Robinson Shirley Buckley Colin Heaton Susan Horridge Joanne Dawson Joanne Culliney Barry Spence Annmarie Bennett Christopher Culliney George Wood Rebecca Robinson Alexandra Saffer Daniel Robinson

Carole Martin Derek M Glynn Geoff Woods Saul Bennett Colleen Donovan-Togo Carolyn Saffer Paul Taylor Angela Shaw Samantha Doggett Lucy Taylor Aimee Shaw Jennifer Cronin Sheila Jackson Barbara Cooke Brian Wright Lorraine Tucker Kelly Fox Brian Cooke Paul Yarwood Lisa Wright Sara Slater Victoria Hothersall Abby Derere Adam Burgess Craig Tucker Jacqueline Yarwood Alan Bayfield Anna Katherine Burgess Debbie Pownceby Marjorie Higham Rebecca Hindle Nicola Kerr Gwynneth McManus Andy Skelly Gwyneth Derere Julia Gallagher Joanne Dallimore Alison Lees David J Arnfield Peter Cooke Emma Nye Donald Berry Kath Dobson Patricia Hay Jane Bennett Carl Mason Leanne Labrow Pamela Maxon Dawn Johnstone Elisabeth Berry
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Policy JP-G10.15	Peel L&P Investments (North) Ltd Peel L&P Investments (North) Ltd Oltec Group Ltd Redrow Homes Limited Russell LDP BDW Trading Ltd Jones Homes (North West) Ltd HIMOR, Redrow Homes Limited and VHW Partnership
Policy JP-G10.19	Aviva Life & Pensions UK Harworth Group Miller Homes Northern Gateway Development Vehicle LLP (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Northern Gateway Development Vehicle (c/o Helen Hartley) Church Commissioners for England Persimmon Homes North West Morland Capital Partners No.1 Ltd St. Helens Council Bowdon Rugby Club Miri Roshni W R Halman J M Gibney C L Halman F I Carless Bluemantle Peel L&P Investments (North) Ltd Peel L&P Investments (North) Ltd Redcliff Estates Casey Group Milnes Gaskell Estate Highgrove Strategic Land Ltd Crossways Commercial Estates Ltd Rowland Homes Ltd Bellway Homes Ltd Miller Homes Manchester Bolton & Bury Canal Society Greater Manchester Housing Providers Countryside Properties LLP, Casey Group Ltd and Wain Homes Peter and Diane Martin HIMOR Group Hollins Strategic Land Russell LDP Hollins Strategic Land

	Wainhomes (NW) Ltd
Policy JP-G10.22	AARD - Action Against Rural Development Chantal Johnson Lynne Hastings Marlene Hession Jason Richards Susan Theodossiadis Elizabeth Jane Glew
Policy JP-G10.29	Julie Halliwell Save Greater Manchesters Green Belt (SGMGB) Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups Gary West Persimmon Homes North West Morris Homes (North) Ltd Jeff Houghton Stephen Cluer Landowners of Holme Valley Simister Village Community Association Taylor Wimpey
Policy JP-G10.30	Peter Stanyer Marc O'Driscoll Linus Mortlock Mike Seer Stephen Hefford Anthony Dann helen dryden Trevor Thomas Samantha Turner Linda Field Andrew Jay Mark Harris Kay Bruce Peter Stratton Susan Peat paul roebuck Colin Walters Trevor Widdop Helen Skidmore Deborah Foulkes Lindy Jarvis Anne Isherwood Louise Bolotin Peter Christie C. Axon Lynn Clegg Irene Thomson

Patricia Cooke
Graham White
heather Bebbington pugh
Michael Hullock
E Bowles
Alan Sheppard
Judith Sheppard
Samantha Dugmore
sarah burlinson
Louise James
Michelle Duncalf
Kim Scragg
Caroline Grimshaw
Michael Reeve
Julie Halliwell
Janet Taylor
David Hawes
Lesley Heneghan
Joanne Maffia
Save Greater Manchesters Green
Belt (SGMGB)
Save Greater Manchesters Green
Belt (SGMGB) - Oldham Groups
Save Greater Manchesters Green
Belt (SGMGB) - Bury Groups
Matthew Oxley
Gary West
Gillian Boyle
Steven Nelson
Nigel Hyams
Save Royton's Greenbelt Community
Group
Alan Bayfield
Save Greater Manchesters Green
Belt (SGMGB) - Save Apethorn &
Bowlacre
Martin Rigby
Peter Pemberton
John Williams
Barbara Keeley
Steven Brown
Tina Brown
Janine Lawford
Metacre Ltd
Church Commissioners for England
Esther Chandler
Alison cavanagh
Jeff Houghton
Joanne Koffman
Sheila Tod

David McLaughlin Maureen Buttle Kate Tod Brenda Foley Laura Charlotte Alison Doherty Jill Neal Laura Etrick kaitlyn Stockport Susan Evans Karen Cornwall Glenn Dillon Martha Hughes John Turner Miriam Latham Amy Fletcher Simon Robertson Rosaleen O Donnell Peter Rowlinson Linda Newton Ann Guilfoyle Louise Daveron Chris Green The Friends of Bury Folk Stephen Cluer Jacqueline Charnock Carl Southward Christopher Russell Martyn Jones Kathryn Russell Woodford Neighbourhood Forum Anne McNally Rosedale Property Holdings Limited Roy Chapman Lucy Houghton Faith Crompton Hazel Hague Steven And Brenda Smith Rod Storey Paul Wilkins Hilary Siddall Lesley Cutts Jane Chester David Williams John Ackerley Alexandra Cluer Andrea Keeble Roger W P Hulme Roz Kaufman Kenneth Leslie Smith
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Emma Swindells Barrie Warren Martyn Shewring Andy Webb Dave Gray Lisa Mather Deborah Morgan Peter Mather Susan Higgins Juliet Eastham Oscar Majid Yvonne Robinson Stuart Johnstone Susan Fleming Andrew Fleming Catherine Schofield Tom Wood Michelle Mcloughlin Joan Glynn Viv Barlow Jacqueline Majid S Stratton Hazel Keane John Robinson Shirley Buckley Colin Heaton Susan Horridge Joanne Dawson Joanne Culliney Barry Spence Annmarie Bennett Christopher Culliney George Wood Rebecca Robinson Alexandra Saffer Daniel Robinson Carole Martin Derek M Glynn Geoff Woods Saul Bennett Colleen Donovan-Togo Carolyn Saffer Paul Taylor Angela Shaw Samantha Doggett Lucy Taylor Aimee Shaw Jennifer Cronin Sheila Jackson Barbara Cooke
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Brian Wright Lorraine Tucker Kelly Fox Brian Cooke Paul Yarwood Lisa Wright Sara Slater Victoria Hothersall Abby Derere Adam Burgess Craig Tucker Jacqueline Yarwood Alan Bayfield Anna Katherine Burgess Debbie Pownceby Marjorie Higham Rebecca Hindle Nicola Kerr Gwynneth McManus Andy Skelly Gwyneth Derere Julia Gallagher Joanne Dallimore Alison Lees David J Arnfield Peter Cooke Emma Nye Donald Berry Kath Dobson Patricia Hay Jane Bennett Carl Mason Leanne Labrow Phil Harris AARD - Action Against Rural Development Chantal Johnson Maika Fleischer Susan Sollazzi Suzanne Nye Bernadette Clough Ian Hubbard Mat Burbery Zoe Sherlock Elaine Robertson Catherine Poulton Alex Abbey Hilary Rhoden Caroline O'Donnell Mary Walsh
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G R Walsh Climate Action Bury Anthony Heed Carole Heed Pamela Maxon Friends of the Earth Dawn Johnstone United Utilities Property Services Jason Robinson Katherine Robinson Hillary Rhoden Roderick Riesco Lynne Hastings Marlene Hession CPRE David Britton Tony Parker Ben Parker Leesa Parker Patricia Deacon Paul Heywood Jackie Harris Jenny Bowring Elisabeth Berry Shepherd Group Ian Barker Ramblers Greater Manchester and High Peak Area Peter Longworth Howard Sykes Friends of Carrington Moss Peter Thompson Peter Thompson Simon Travis David Brownlow D W And J Tandy Marlene Hession Robert Birchmore Gareth Costello Graham Walsh The Wildlife Trusts David Boulger Aydin Sezen Mahmutoglu Patricia Hay Christopher Harper Carol Burke Tim Eastwood Stephanie Rogers Jason Richards Francis Lee
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	<p>Lucas Smith SRH Properties Ltd Carole Dawson Katarzyna Milkiewicz-Siewiorek Louise Seddon Alan Gibson Elizabeth Hogan Barbara Lloyd Susan Theodossiadis Richard Lucas Simister Village Community Association Jean Markham Elizabeth Jane Glew Gaynor Kinsley Kelly Baker Taylor Wimpey Mark Haynes Julie Jerram</p>
Policy JP-G10.31	<p>Marc O'Driscoll Helen Skidmore Lindy Jarvis Patricia Cooke Alan Sheppard sarah burlinson Michelle Duncalf Kim Scragg Julie Halliwell Save Greater Manchesters Green Belt (SGMGB) - Oldham Groups Save Greater Manchesters Green Belt (SGMGB) - Bury Groups Nigel Hyams Save Greater Manchesters Green Belt (SGMGB) - Save Apethorn & Bowlacre Martin Rigby Peter Pemberton John Williams Barbara Keeley Jeff Houghton Brenda Foley Glenn Dillon Rosaleen O Donnell The Friends of Bury Folk Carl Southward Christopher Russell Kathryn Russell Warburton Parish Council Hazel Hague</p>

Nigel Spence Alexandra Cluer Andrea Keeble Kenneth Leslie Smith Emma Swindells Barrie Warren Andy Webb Lisa Mather Deborah Morgan Peter Mather Susan Higgins Juliet Eastham Oscar Majid Yvonne Robinson Stuart Johnstone Susan Fleming Andrew Fleming Catherine Schofield Tom Wood Michelle Mcloughlin Joan Glynn Viv Barlow Jacqueline Majid S Stratton Hazel Keane John Robinson Shirley Buckley Colin Heaton Susan Horridge Joanne Dawson Joanne Culliney Barry Spence Annmarie Bennett Christopher Culliney George Wood Rebecca Robinson Alexandra Saffer Daniel Robinson Carole Martin Derek M Glynn Geoff Woods Saul Bennett Colleen Donovan-Togo Carolyn Saffer Paul Taylor Angela Shaw Samantha Doggett Lucy Taylor Aimee Shaw Jennifer Cronin

Sheila Jackson Barbara Cooke Brian Wright Lorraine Tucker Kelly Fox Brian Cooke Paul Yarwood Lisa Wright Sara Slater Victoria Hothersall Abby Derere Adam Burgess Craig Tucker Jacqueline Yarwood Alan Bayfield Anna Katherine Burgess Debbie Pownceby Marjorie Higham Rebecca Hindle Nicola Kerr Gwynneth McManus Andy Skelly Gwyneth Derere Julia Gallagher Joanne Dallimore Alison Lees David J Arnfield Peter Cooke Emma Nye Donald Berry Kath Dobson Patricia Hay Jane Bennett Carl Mason Leanne Labrow Bernadette Clough Ian Hubbard Zoe Sherlock Elaine Robertson Catherine Poulton Hilary Rhoden Pamela Maxon Dawn Johnstone Jason Robinson Katherine Robinson Marlene Hession CPRE David Britton Tony Parker Ben Parker

	<p>Leesa Parker Patricia Deacon Paul Heywood Jackie Harris Elisabeth Berry Shepherd Group Friends of Carrington Moss Simon Travis D W And J Tandy Marlene Hession Gareth Costello Aydin Sezen Mahmutoglu Patricia Hay Carol Burke Stephanie Rogers John A Holden Elizabeth Hogan Simister Village Community Association Elizabeth Jane Glew</p>
Policy JP-G10.32	<p>Peter Stanyer Samantha Turner C. Axon Glenn Dillon Hazel Hague Paul Wilkins John Ackerley Dave Gray Susan Sollazzi Climate Action Bury Lynne Hastings Marlene Hession Jenny Bowring Ramblers Greater Manchester and High Peak Area Friends of Carrington Moss Aydin Sezen Mahmutoglu Simister Village Community Association Mark Haynes</p>

Respondents to PFE 2021 Policy JP-G11 – Safeguarded Land

Row	Respondent name(s)
Policy JP-G11.3	<p>George Clancy Aviva Life & Pensions UK Morland Capital Partners No.1 Ltd Redrow Homes Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd</p>

	Rowland Homes Ltd Hollins Strategic Land Bellway Homes Ltd Redrow Homes Trafford Miller Homes NPL Group PD Northern Steels Peter and Diane Martin HIMOR Group Hollins Strategic Land Hollins Strategic Land Home Builders Federation Wainhomes (NW) Ltd Housebuilding Consortium Taylor Wimpey
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