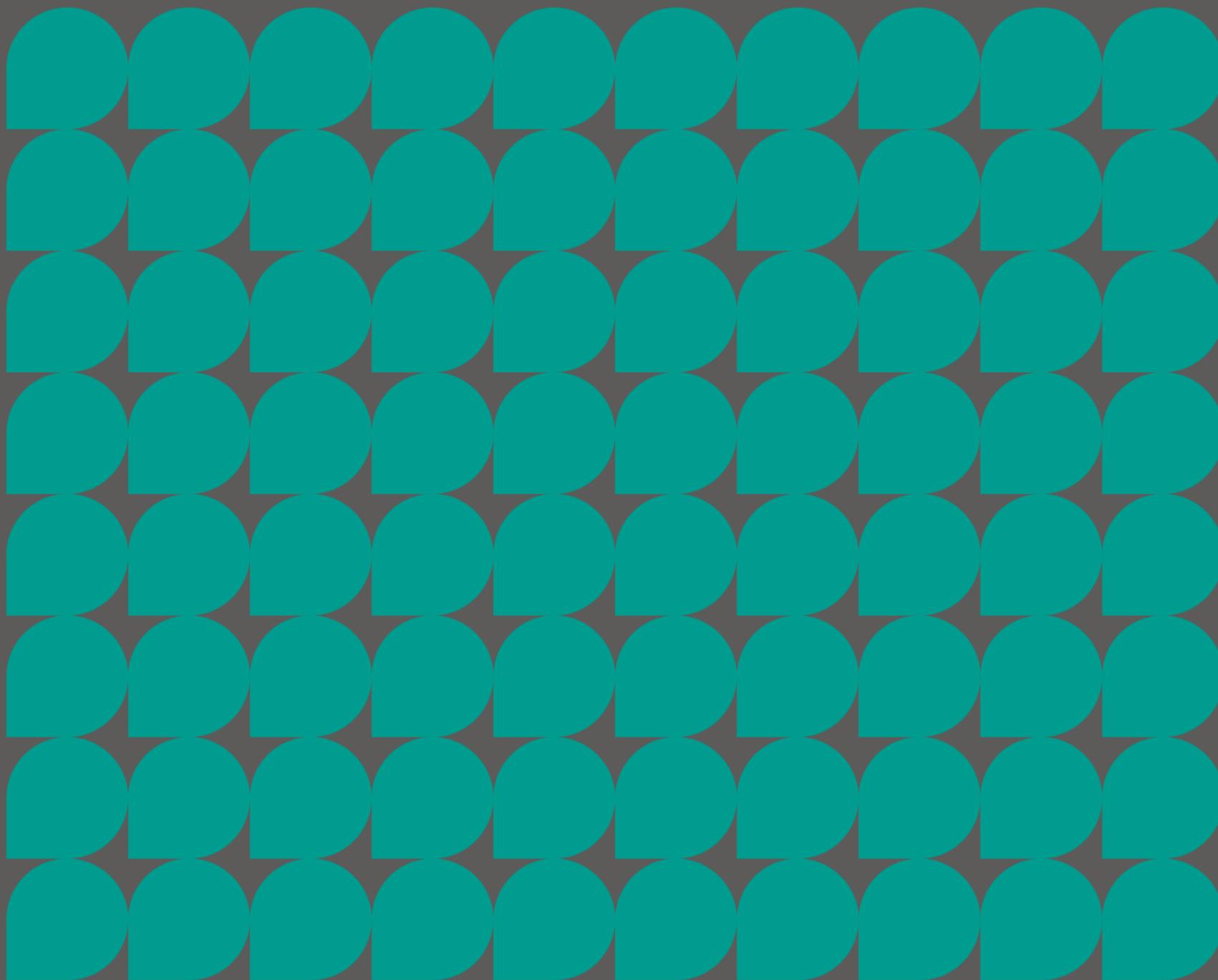


Places for Everyone

Places for People Issues Summary

February 2022



Chapter 9 – Places for People

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 9 – Places for People and the relevant respondents to PfE 2021 is set out below:

Policy JP-P 1 Sustainable Places

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
P1.1	<p>These plans will merely bring healthy, lower carbon, better air quality areas down to the level of those with the poorest levels. There are enough local areas struggling to reach even the lowest air quality measurements, let alone those failing miserably in view of proximity to local motorways. Busy roads with traffic congestion are a daily curse and the future loss of green spaces/development outlined will make this so bad as to be unbearable. Detailed modelling and monitoring is required.</p>	<p>Greater Manchester (GM) is taking action to improve air quality on local roads – now and for future generations. GM Districts have worked together to develop and agree the Greater Manchester Clean Air Plan (2021). This aims to bring nitrogen dioxide (NO2) levels on local roads within legal limits by 2024.</p> <p>PfE 2021 Policy JP-S 6 Clean Air specifically addresses the concerns raised here, including clause 3 which requires applications for developments that could have an adverse impact on air quality to submit relevant air pollution data and, if approved, to make appropriate provision for future monitoring of air pollution.</p> <p>In relation to traffic and air pollution, paragraph 5.49 of the Plan highlights that the primary focus is on transport given its primary contribution to air pollution, therefore regard should be had to transport policies elsewhere in the Plan.</p> <p>The districts and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. This is set out in the GM Transport Strategy 2040 [09.01.01], Our Five Year Transport Delivery Plan 2021-2026 [09.01.02], and the Right Mix Technical Note: [09.01.03].</p> <p>Therefore no change is considered necessary.</p>	<p>Susan Roberts Collette Gammond Brenda Foley</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P1.2	Detailed infrastructure plans are required to support the plan.	The GMCA has prepared an Infrastructure Framework 2040 to support the delivery of the Greater Manchester Infrastructure Strategy and PfE 2021. Detail of necessary allocation specific infrastructure can be found in relevant allocation policies and topic papers: PfE Supporting Documents . Additionally, masterplans, where required, will provide further detail as schemes develop. Therefore no change is considered necessary.	Mike Bolton Kim Scragg C Smith Julie Jerram
P1.3	A sustainable places policy within a Plan that proposes the release of large amounts of greenbelt and open land, [particularly in the Bury area] is flawed.	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] .	Frances Davidson Gillian Boyle Edward Beckmann Brenda Foley Grace Farrell Julie Jerram
P1.4	The restrictive proposals contained in the policy on housing density will undermine a policy on sustainable places.	Policy JP-H 4 Density of New Housing sets the minimum residential density for new development that is appropriate for the location and relative accessibility of the site, and provides sufficient flexibility to take account of site-specific circumstances. That policy, together with others in the Plan will help to ensure that efficient use is made of land. This is an approach which is considered to be consistent with NPPF paragraph 125 and supports the ambitions of PfE for development in sustainable places, as set out in paragraphs 7.8, 7.34 and 9.10 in support of policies JP-H4 and JP-P1. Therefore, no change is considered necessary.	Gillian Boyle
P1.5	The Green Belt has a positive effect on the mental and physical health of residents and visitors. The history, wildlife and ancient hedgerows must be protected from unnecessary development.	The PfE sets out a very 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 objectives of the Plan, a limited amount of development is required on land outside of the urban area on greenfield and/or Green Belt land. The release of greenfield and Green	John Williams Edward Beckmann Grace Farrell Mark Haynes Julie Jerram

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Belt land has, however been kept to a minimum and the Policies within PfE 2021 Greener Places chapter supports the approach promoted in the Government's 25 Year Environment Plan (Chapter 3) which aims to help people improve their health and wellbeing by using green spaces. Further details are set out in the Natural Environment Topic Paper [07.01.26] . Therefore no change to the policy is considered necessary.	
P1.6	The identities of some areas have been ruined with high rise in the city centre and the loss of green space elsewhere.	Policy JP-P1 recognises the importance of retaining local identity and character, requiring new development, wherever appropriate, to be distinctive with a clear identity that respects and acknowledges the character and identity of the locality in terms of siting, size, scale and materials used. Therefore no change to the policy is considered necessary.	Brenda Foley Laura Charlotte
P1.7	Some areas are already at a saturation point for satisfactory living for the present residents. No more can be accommodated in such areas, without severe deterioration in the environment and quality of life for the present residents and local wildlife. Flooding as a result of climate change is exacerbated with the loss of greenspaces and infrastructure (schools, doctors, roads) is over stretched.	An Integrated Assessment has been carried out, incorporating elements of an Strategic Environmental Assessment which promotes sustainable development, health and equality issues and ensures that they are considered as the plan has been prepared. PfE is also considered to be supported by a proportionate and appropriate evidence base, including a strategic flood risk assessment [04.02.01] , habitat regulation assessments, transport locality assessments and specific allocation topic papers in the PfE Supporting Documents . It is considered that the Plan as a whole provides an appropriate policy framework to provide necessary mitigation for proposals in these matters, such as set out in Policies JP-S1, JP-S5, JP-S6, JP-P5, JP-P6 and JP-D2 which states that new development must be supported by the necessary infrastructure, including where appropriate schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.	Frances Davidson Susan Roberts Brenda Foley Alison Doherty Julie Jerram
P1.8	Allow nature to thrive with wildlife, even if that means providing services such as new 'park rangers'	Improving the quality of our natural environment is a strategic objective of PfE 2021 which commits to enhancing special landscapes, green infrastructure, biodiversity and geodiversity. Policies within the Greener Places Chapter provide an effective policy framework to deliver this. The provision of park rangers would be a matter for consideration at the local level. Therefore no change is considered necessary to the policy.	Simon Robertson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P1.9	Great aspiration, can you deliver?	<p>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 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.</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. Therefore no change is considered necessary.</p>	Ann Guilfoyle
P1.10	Does not sufficiently recognise the role of community facilities, including public houses, in shaping and supporting sustainable places.	Whilst Policy JP-P1 recognises the important role that community facilities play in shaping and supporting sustainable places, and is appropriate and consistent with national policy, Policy JP-P3 specifically states that existing community venues, facilities and uses will be protected. The Plan should be read as a whole, therefore it is considered that an appropriate strategy is provided within the Plan for community facilities, including public houses, in line with NPPF. No change to the policy is considered necessary.	Bolton CAMRA Trafford & Hulme CAMRA GM CAMRA
P1.11	Mental health resilience is not represented here and in particular Green Infrastructure makes an important contribution to mental wellbeing and therefore should be an integral part of any new development.	Paragraph 1.40 of the Plan recognises the important role of Green Infrastructure in promoting physical and mental health. Policies within the plan also support the approach promoted in the Government's 25 Year Environment Plan (Chapter 3) which aims to help people improve their health and wellbeing by using green spaces. Clauses 9 and 16 of JP-P1 recognise the importance of Green Infrastructure and green spaces in new development; Policy JP- P6 Health seeks to maximise the positive contribution to health and well-being (of new development) and JP-P7 Sport and Recreation and the Greener Places chapter provide additional policy direction. Further details are set out in the Natural Environment Topic Paper	City of Trees

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		[07.01.26] . The Plan should be read as a whole, therefore no changes are considered necessary.	
P1.12	The plan needs to allow for the release of additional Green Belt land and the subsequent creation of high-quality neighbourhoods of choice, each of which have a strong sense of place and are areas in which people aspire to live within.	Objective 2 and para 9.7 of the Plan sets out an ambition that all parts of Greater Manchester will be neighbourhoods of choice, with good quality affordable homes in safe, attractive communities. This ambition will be delivered through a range of policies within the Plan, not just housing and Green Belt policies, and through a range of site allocations across the nine Districts. Sufficient Green Belt land is proposed to be released to meet identified development needs. Therefore no changes are considered necessary.	Taylor Wimpey
P1.13	This policy would be more effective if it made it clear what Local Plans will be expected to cover in terms of policy and what to depict on Proposal Maps, as well as how the policy will be treated in a development management context. This is not a policy outlining specific requirements in relation to development over the plan period. Instead, it is a vision outlining how PfE aims to become one of the most liveable city regions in the world and no policy requirements are stated.	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'.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Peter and Diane Martin Boys & Girls Club of GM Redrow Homes (Trafford)
P1.14	This policy can be strengthened by: <ul style="list-style-type: none"> • withdrawal of all Allocations within this Plan (for handling through the Local Plan process) to enable genuine consultation with local residents • the inclusion of the adoption of the Gunning Principles in all GM Statements of Community Involvement • the review and update of all GM Statements of Community Involvement with residents (with the Policy confirming that all future updates to SCIs will be undertaken in conjunction with local residents). 	Comment not relevant to the content of the Places for People chapter. Matter addressed elsewhere.	Friends of Carrington Moss
	Policy Comments		
P1.15	Amend criteria point 1 of the policy to read: 1. Distinctive, with a clear identity that: A. <u>Conserves and enhances</u> Responds to the natural environment, landscape features, historic environment and local history and culture;	Policy JP-P1 provides a broad policy framework for place making which is supplemented by other policies in this plan and will also be subject to further clarification within district local plans or planning guidance. Criterion 1A reflects the approach of the overall policy.	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Specifically in this context, the conservation and enhancement of the historic environment is provided by JP-P2, and the Greener Places chapter provides a similar policy framework for the natural environment. Therefore no change is considered necessary.	
P1.16	Criteria 4, 5 and 6 are vague and unclear - modify with the inclusion of a precise and specific list such that the requirements of new development are clear and proposals can be assessed in the light of their compliance with those requirements.	No change is considered necessary. Policy JP-P1 is considered to be consistent with NPPF and provides an appropriate strategy to respond to climate change and promote sustainable development which is a key objective of the plan and NPPF.	Peel L&P Investments (North) Ltd
P1.17	Rural character should be referred to in particular, criterion 7 best and most versatile farmland grade 1 and 2 should be specified for retention, and under criterion 16 that hedgerows should be cited for retention.	The protection of best and most versatile agricultural land and hedgerows is covered in policies JP-G9 and JP-G4 respectively. The Plan should be read as a whole, therefore no changes are considered necessary.	CPRE
P1.18	The words 'accessible' and 'accessibility' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended (criterion 11).	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents and 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 or in other documents and no changes are necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
P1.19	Clause 16 - include biodiversity.	The intention of this policy is to set out the key attributes for new development in broad, strategic terms. This is reflected in clause 16 in relation to green infrastructure. More specific detail in relation to biodiversity specifically is provided in Chapter 8 – Greener Places. The Plan should be read as a whole and therefore no modification is considered necessary.	The Wildlife Trusts
	Monitoring		
P1.20	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. 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)
P1.21	Consider using commuting as a measure in environmental data.	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. Therefore no change is considered necessary.	Colin Walters
	Integrated Assessment		
P1.22	In view of our comments on the Plan, Historic England consider that as drafted the policy and the Chapter would be very incompatible (-/?) with IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England

Policy JP-P 2 Heritage

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent name(s)
	General comments		
P2.1	The Framework should be based on an appropriate level of up-to-date evidence about the historic environment.	It is considered that Policy JP-P2 is informed by, and based on, an appropriate and proportionate level of up-to-date evidence about the historic environment, as detailed in paragraph 9.12. A Heritage Topic Paper [08.01.12] and a strategic historic environment assessment [08.01.01] have been published alongside the Plan, and individual districts have commissioned site specific historic environment assessments . Therefore, no change is considered necessary.	Collette Gammond
P2.2	Before proposing site allocations, the NPPF requires an appropriate evaluation of the impact which the allocation of a site and the proposed level of development might have upon any elements (including setting) that contribute to the significance of a heritage asset.	It is considered that appropriate evaluations have been carried out in line with NPPF. For further details please see the Heritage Topic Paper [08.01.12] and the strategic historic environment assessment [08.01.01] . Additionally, relevant site allocations policies require development proposals to conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of site specific historic environment assessments . Up-to-date Heritage Impact Assessments will also be required at the planning application stage. Therefore, no change is considered necessary.	Louise Bolotin Julie Halliwell
P2.3	Heritage impact assessments should be prepared for each of the proposed allocations, to consider potential impacts upon the significance of heritage assets and their setting, the appropriate type/quantum of development, its public benefit, and how any harm could be mitigated. Without this, it cannot be demonstrated that the objectively assessed development needs of the plan area will be met in accordance with the presumption in favour of sustainable development.	A screening of all the allocations was carried out in the strategic historic environment assessment [08.01.01] and, where necessary, individual site specific historic environment assessments . Following these assessments, the relevant allocations in the plan include reference to the need to conserve and enhance heritage assets and their setting and for up-to-date Heritage Impact Assessment(s) to be required at the planning application stage. Additionally all the policies in the plan, including Policy JP-S1 Sustainable Development and the site allocations, have been independently assessed through the Integrated Assessment [02.01.02] which promotes sustainable development. Therefore, no change is considered necessary.	Louise Bolotin Mineral Products Association Glenn Dillon Louise Bolotin Alan Sheppard Julie Halliwell Mark Haynes Ann Guilfoyle E Bowles
P2.4	This local area has already allowed many mills, business and heritage to fall to ruins at cost of millions to local tax payers. Can you deliver?	It is considered that Policy JP-P2 is informed by, and based on, an appropriate and proportionate level of up-to-date evidence about the historic	Ann Guilfoyle

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		environment, as detailed in paragraph 9.12 which refers to the Greater Manchester Textile Mills Survey. A Heritage Topic Paper [08.01.12] and a strategic historic environment assessment [08.01.01] have been published alongside the Plan, and individual districts have commissioned site specific historic environment assessments . Therefore, no change is considered necessary.	
P2.5	Reference Historic England and their registers of important heritage assets, including Parks and Gardens.	Paragraph 9.12 makes reference to a number of key sources of information, including the National Heritage List for England, which includes within it, the Register of Parks and Gardens. Additionally, the Heritage Topic Paper [08.01.12] (page 29) recognises the Register of Parks and Gardens which classifies designated parks and gardens using the same designations as other heritage assets. No change is considered necessary.	Terence Kelly
P2.6	Heritage, locally, is about access to green spaces and waterways for exercise, more development reduces that leisure provision.	<p>PfE is a joint strategic development plan document which promotes a sustainable pattern of development for the nine districts and should be read as a whole. Policy JP-P2 specifically addresses heritage and the historic environment rather than the natural environment. The Greener Places chapter sets out support for the important role of our natural assets by valuing the special qualities and key sensitivities of our landscapes; seeking to protect and enhance green and blue infrastructure; and seeking an overall enhancement of biodiversity and geodiversity.</p> <p>This is endorsed in the Places for People chapter through JP-P1; JP-P6 and JP-P7; and also, Policies JP-G3 and JP-C5. Additionally, the allocation policies make appropriate provision for open space and active travel.</p>	Frances Davidson
P2.7	The plan should recognise the need for the sympathetic building materials to ensure local vernacular is maintained.	PfE is a joint strategic development plan document which promotes a sustainable pattern of development for the nine districts and should be read as a whole. The PfE 2021 provides a strategic planning framework to achieve this at JP-P 1 Sustainable Places, clause 1 C which suggests that all development... 'Respects and acknowledges the character and identify of the locality in terms of design, siting, size, scale and materials used' and	Mineral Products Association

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>clause 6...'Durable, being built to last and using robust materials that reflect local character, weather well and are easily maintained'.</p> <p>However, local planning authorities will also set out more detailed policies for specific areas or types of development within relevant policies and or additional guidance in line with NPPF paragraph 28.</p>	
P2.8	Heritage does not necessarily mean ancient history, present way of life is part of our heritage and development/ plans have not respected present population sense of heritage.	It is considered that Policy JP-P2 is informed by, and based on, an appropriate and proportionate level of up-to-date evidence about the historic environment, as detailed in paragraph 9.12. A Heritage Topic Paper [08.01.12] and a strategic historic environment assessment [08.01.01] have been published alongside the Plan, and individual districts have commissioned site specific historic environment assessments . Additionally, Policy JP-P1 addresses the issues raised. Therefore, no change is considered necessary.	Maureen Buttle
P2.9	There is a failure to recognise the role of public houses in providing a rich source of heritage assets both architectural and historical.	Public houses are recognised in the Heritage Topic Paper [08.01.12] . Whilst not specifically referring to public houses, the policy does identify 'other sites, buildings and areas of identified archaeological, architectural, artistic and historic value' within a list of key elements of the historic environment, which would include public houses of heritage value.	Bolton CAMRA Trafford & Hulme CAMRA GM CAMRA
P2.10	Consideration should be given to the countryside in addition to those stated.	PfE is a joint strategic development plan document which promotes a sustainable pattern of development for the nine districts and should be read as a whole. This policy is consistent with the NPPF and sets out a positive strategy to address heritage in both urban and rural settings. Further detail is set out in the Heritage Topic Paper [08.01.12] . An appropriate policy framework is provided for environmental assets elsewhere in the Plan, particularly within the Greener Places chapter. Therefore no change is considered necessary.	CPRE
P2.11	Heritage assets 'at risk' - new development, rather than being a threat to heritage, can assist in the regeneration through enabling development, and this is true for both brownfield and greenfield sites.	Policy JP-P2 is considered to be in accordance with NPPF paragraph 208 and Historic England advice in that it provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. Enabling development is a development management mechanism, which is only applicable in certain circumstances to secure the future conservation of	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Boys & Girls Club of GM

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		a heritage asset, in situations where the proposed development would otherwise conflict with adopted planning policy. It will be for the relevant local planning authority to assess the benefits of a proposal for enabling development in line with NPPF paragraph 208 as part of the decision making process. Therefore no change is considered necessary.	
P2.12	<p>This policy can be strengthened by including the following:</p> <ul style="list-style-type: none"> • increase the focus on the environmental heritage in GM, including in the Policy wording itself • provision of a brief summary of Heritage Assessment outcomes covering all the Allocations • withdrawal of any Allocation that is not aligned with this Policy. 	<p>Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. This policy would not preclude the protection of environmental heritage assets, additionally, protection is offered to such assets within the Greener Places Chapter.</p> <p>A screening of all the PfE allocations was carried out in the strategic historic environment assessment [08.01.01] and, where necessary, in individual site specific historic environment assessments. Following these assessments, the relevant allocation policies in the plan include reference to the need to conserve and enhance heritage assets and their setting and that up-to-date Heritage Impact Assessment(s) will be required at the planning application stage, to ensure accordance with this policy where required. The Plan should be read as a whole and therefore no change is necessary.</p>	Friends of Carrington Moss
	Supporting Text		
P2.13	<p>Amend paragraph 9.11 – third sentence to read:</p> <p>“Many towns and villages of Greater Manchester can trace their origin to Saxon or Viking <u>settlers, with their</u> place names, often reflecting distinctive landscape features or farmsteads.</p>	<p>Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed.</p>	Historic England
P2.14	<p>Add a further paragraph to the supporting justification after 9.12 to read; “Key elements of the historic environment include:</p> <ul style="list-style-type: none"> • Industrial: including the mills and chimneys of the textile industry, other notable industrial related activities such as coal and lime extraction, brewing, hat making, glassworks, chemical and locomotive manufacture • Transport infrastructure: including historic roads and bridges (some of medieval origin), canals and railway infrastructure; 	<p>The key elements of the historic environment listed within the proposed paragraph are addressed within the Heritage Topic Paper [08.01.12] and the evidence base referenced in paragraph 9.12. To provide this level of detail in the supporting text of JP-P2 would be contrary to the approach adopted elsewhere in this strategic development plan document in providing unnecessary duplication of the evidence base.</p>	Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<ul style="list-style-type: none"> • Places of social, political and cultural reform: Including sites relating to suffragettes, the campaign for suffrage (both male and female), the Co-operative and Temperance Movements. Memorials, including statues, buildings and other structures such as fountains dedicated to individuals of national, regional and local significance, as well as memorial sites of community significance (e.g. cemeteries, War Memorials • Sports and leisure: including public houses, swimming baths, billiard halls, cinemas and sport facilities • Places of worship: Including churches, chapels and other buildings, serving all denominations and those built to serve the rapidly expanding population of the 19th century. • Large hall residences and their associated open spaces: Including manorial and timber framed structures and moated sites. • Dwelling houses: Including workers housing, villa estates and suburban growth and model villages. • Significant archaeological sites: including those associated with Roman, medieval and industrial activities; • Open spaces: Including historic parks and gardens, squares, markets and landscape infrastructure such as railing gates, walls and monuments; and • Farmsteads and agricultural buildings. <p>Conservation areas: including town and city centres, extensive residential suburbs, industrial areas and cemeteries.”</p>		
	Policy Comments		
P2.15	<p>The following clarification of and modifications to draft Policy JP-P 2 to ensure consistency with the NPPF and relevant guidance for the historic environment:</p> <p>Through this Plan we will proactively manage and work with partners to positively conserve, sustain and, <u>where possible</u>, enhance its historic</p>	<p>Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF. The terms ‘where possible’ and ‘aspects of setting’ do not appear within NPPF para 190. Therefore, no changes to the policy are considered necessary.</p>	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	environment and heritage assets (<u>including aspects of setting that contribute to significance</u>)...		
P2.16	Amend final sentence of first paragraph of policy to read: Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct <u>character</u> , identity and sense of place.	Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed.	Historic England
P2.17	Amend second paragraph of policy to read: "Local Plans will set out the key elements which contribute to the district's identity, character and distinctiveness and which should be the priority for <u>conserving</u> safeguarding and enhancing in the future, and demonstrate a clear understanding of the historic environment and the heritage values of sites, buildings or areas and their relationship with their surroundings. This knowledge should be used to inform the positive <u>management and</u> integration of our heritage by."	Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed.	Historic England
P2.18	Amend criteria point 2 to read: Utilising <u>Ensuring that</u> the heritage significance of a site or area in the planning and design process, providing <u>maximising</u> opportunities for interpretation and local engagement;	Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF.	Historic England
P2.19	Amend criteria point 3 to read: 3. Integrating the <u>Ensuring</u> that all development conservation and enhancement of heritage assets and their settings, <u>and where appropriate,</u> <u>uses</u> with creative contextual architectural responses that contribute positively to their significance and sense of place;	Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested.	Historic England
P2.20	Criterion 3. Amend wording of policy to read: "Integrating the conservation and <u>potential</u> enhancement of heritage assets (<u>including, where appropriate, elements of their setting</u>), with creative contextual architectural responses that contribute to their significance and sense of place."	Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested.	Peel L&P Investments (North) Ltd
P2.21	Criterion 4, amend policy wording to read:	Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	“ Delivering positive benefits that sustain and, <u>where possible</u> , enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing;...	a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested.	
P2.22	Add after criteria point 5, in the third paragraph, the words in red: “Development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and <u>historic designed</u> landscapes. The protection of undesignated heritage assets of <u>landscape</u> and archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.”	Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested.	Lancashire Gardens Trust
P2.23	4 th paragraph, amend policy wording to read: “Development proposals affecting a designated heritage asset (or an archaeological site of national importance) and a conservation area should <u>seek to</u> conserve those elements, <u>including aspects of setting</u> , which contribute to its significance. including those identified in any conservation area appraisal as making a positive contribution to the area. Harm to such elements will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal. If harm arises it should be assessed against the framework set out in the NPPF for designated and non-designated heritage assets, as appropriate. ”	Policy JP-P2 is considered to be in accordance with NPPF and provides a positive strategy to conserve and enhance the historic environment which is a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested, as it would be inconsistent with NPPF, particularly paragraph 200.	Peel L&P Investments (North) Ltd
P2.24	The last sentence of paragraph four of Policy JP-P 2 should be amended so that it states : Harm to such elements will only be permitted where this is clearly justified and <u>the harm is</u> outweighed by the public benefits of the proposal.	Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF. It is not considered appropriate to amend the policy as suggested, as it would not be consistent with NPPF (particularly paragraph 200).	Redrow Homes (Trafford)
P2.25	5 th paragraph, last sentence, amend policy wording to read: “The protection of non-undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.”	Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed.	Peel L&P Investments (North) Ltd Historic England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P2.26	Add sentence to end of fifth paragraph of policy to read: <u>“.....to designated heritage assets. Development proposals will also be expected to avoid harm to other non-designated heritage assets.”</u>	Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF.	Historic England
P2.27	Add sentence at end of penultimate paragraph of policy to read: <u>Development proposals which will help safeguard the significance of and secure a sustainable future for Greater Manchester’s heritage at risk will be supported.</u>	Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF.	Historic England
P2.28	Add sentence at the end of the final paragraph of policy to read: <u>The results of any additional analysis, recording or excavation of heritage assets and/or sites of interest should be deposited with the Greater Manchester Historic Environment Record.</u>	Policy JP-P2 is considered to be in accordance with NPPF and provides an appropriate strategy to conserve and enhance the historic environment which is a key objective of the NPPF. The proposed wording is not considered necessary to secure the objectives of this policy or the overall plan.	Historic England
	Integrated Assessment		
P2.29	As drafted the policy and the Chapter as a whole would be very incompatible (--) with IA Objective 16.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Historic England

Policy JP-P 3 Cultural Facilities

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent name(s)
	General Comments		
P3.1	Theatres and other cultural buildings can play a key role in helping to support town centres by driving footfall.	Noted. The purpose of such buildings is recognised in Policy JP-P3, paragraph 9.15 and The Greater Manchester Cultural Strategy. No change is considered necessary.	Theatres Trust
P3.2	This still falls short of specifically naming 'community facilities' and defining them in line with the guidance provided in the National Planning Policy Framework paragraph 93.	Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions. Paragraph 93 of NPPF does not require an indicative list of community facilities to be listed within planning policies and to do so would result in unnecessary repetition of national policy.	Theatres Trust Bolton CAMRA Trafford & Hulme CAMRA GM CAMRA
P3.3	Our rural culture should also be protected and enhanced in the future and this is an omission from the policy and needs inclusion.	<p>Policy JP-P3 is considered to provide an appropriate strategy for developing and supporting our cultural businesses and attractions at a strategic level. It is in accordance with NPPF Paragraph 84d which states that planning policies should enable 'The retention and development of accessible local services and community facilities, such as cultural buildings....' to support a prosperous rural economy. It is, therefore, not considered necessary to duplicate NPPF policy.</p> <p>The specific reference to 'our cities and towns' in Policy JP-P3 reflects that the majority of GM's cultural assets are located within urban areas, though this does cover assets within our more rural towns.</p>	CPRE
P3.4	This is more of a wish list than a policy for culture. What is actually proposed and how will it be delivered?	<p>Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions at a strategic level having been informed by the Greater Manchester Strategy for Culture and the Culture Recovery Plan 2021/22. Cultural facilities, including community venues, facilities and uses can be central to place-making as set out in paragraph 9.15. Therefore, it is important to explore ways to proactively develop and support such uses which is what this policy seeks to do through a range of measures which will be implemented/ delivered through the development management process at the local level.</p>	Gillian Boyle Ann Guilfoyle

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Policy Comments		
P3.5	Criterion 1 of the policy seeks to protect all community venues, facilities and uses. However, the evidence base does not demonstrate that all community venues, facilities and uses need to remain in such use, and therefore the blanket approach is not justified. The policy needs to make allowance for changes of use whereby the existing community use is no longer needed or viable.	Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions at the strategic level. As set out in paragraph 9.15, the enhancement of cultural facilities is central to place-making. Therefore, in the first instance, it is important to explore ways to proactively develop and protect such uses.	Emery Planning
P3.6	Criterion 7 - further clarity is required as to what the Creative Improvement Districts designations comprise.	Whilst it is considered that this could improve the clarity of the policy, this is not a soundness issue so no changes are proposed. Further information in relation to Creative Improvement Districts (CIDs) can be found in the GM Culture Recovery Plan . They form part of GM's cultural response to the pandemic.	Peel L&P Investments (North) Ltd
	Monitoring		
P3.7	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-P 4 New Retail and Leisure Uses in Town Centres

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
P4.1	Brexit and Covid impact requires the baseline to be reset to 2022 and a rewrite of this policy.	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] .	Collette Gammond Janet Taylor Maureen Buttle
P4.2	Changing facilities should be included and signposted within town centres. Cycle parking must be designed to be inclusive and accommodate non-standard cycles such as trikes, trailers, cargo bikes and tandems. These facilities should be in a location convenient for access to shops and facilities.	This approach is supported through policy JP-C5 Walking and Cycling and policy JP-C7 Transport Requirements of New Development. Further information is in the Greater Manchester Transport Strategy 2040 refresh [09.01.01] . This matter will also be addressed in further detail through local plans and travel plans. The plan should be read as a whole, and no change is considered necessary.	Trans Pennine Trail
P4.3	Consider developing smaller town centres to avoid people visiting larger towns, shop locally and reduce travelling.	Policy JP-P 4 identifies the upper levels of the hierarchy of centres for retail and leisure in town centres. It is clear that the boundaries and detail of other centres at lower levels of the hierarchy are defined in district local plans, see PfE paragraph 9.21. The need for expansion of any existing centres, or the provision of new centres, will be defined in district local plans. This is consistent with NPPF paragraph 58, therefore no change is considered necessary.	David Hawes
	Policy Comments		
P4.4	Remove the "hierarchy of centres" concept, which is a dated view of retail and leisure uses in town centres. Some are better than others.	Policy JP-P 4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area; which alongside JP-Strat-12 on Main Town Centres provides a sufficient policy framework to address this matter. Evidence can be found in Employment Topic Paper [05.01.04] pages 6, 8, 10 and 12; it is considered to be consistent with national policy, NPPF (paragraph 86 (a)), therefore no change is proposed.	Jeremy Williams

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P4.5	Support the proposed hierarchy of centres but there should be greater protection provided to assure their continued vitality and viability given the challenges they face due to changing consumer behaviour.	Policy JP-P4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area. This is supported in the Employment Topic Paper [05.01.04] pages 6, 8, 10 and 12. The boundary of the centres and the detail of the other centres will be provided in district local plan, as will specific proposals to ensure their vitality and viability. The approach to the hierarchy of centres presented in this policy is considered to be consistent with NPPF (paragraph 86 (a)). Additionally Policy JP-Strat12 addresses issues around challenges to vitality and viability.	Julie Jerram
P4.6	It is not justified to specify that other tiers of the hierarchy will be maintained. The hierarchy below tiers A & B should be reviewed through the District Local Plans.	Policy JP-P4 is a strategic policy which identifies the existing upper levels of the hierarchy of centres to be maintained and enhanced within the PfE Plan area. There is no evidence to suggest that the current broad hierarchy of centres is no longer appropriate. Therefore, in order to be clear about the wider hierarchy and the relationship with district local plans, the PfE plan makes it clear that centres in the lower levels of the hierarchy are defined in district local plans, see PfE paragraph 9.21. The policies in these local plans will be subject to the normal process of local plan review. This approach is considered to be consistent with national policy, NPPF (paragraph 86), therefore no change is proposed.	Emery Planning
P4.7	Identify The Quays as including a main town centre.	Consideration of Salford Quays as a new town centre will be addressed, in the first instance, through the Salford Local Plan. Policy JP-P4 makes it clear that should its designation as a town centre be confirmed in the Salford Local Plan then it would be classed as a Main Town Centre for the purposes of the policy. The Salford Local Plan, which was examined in late 2021, has yet to be adopted, therefore no change is proposed.	Peel L&P Investments (North) Ltd
	Monitoring		
P4.8	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, no change therefore is proposed.	Friends of Carrington Moss

Policy JP-P 5 Education, Skills and Knowledge

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
P5.1	Councils within the Greater Manchester area should set out their education infrastructure requirements for the plan period within an Infrastructure Funding Statement.	Other than where a Community Infrastructure Levy applies, the role of Infrastructure Funding Statements is to provide information, on an annual basis, on the financial contributions that Councils have secured from developers through Section 106 agreements. Allocation policies in the PfE, set out the infrastructure requirements for site specific mitigation as necessary, including education where relevant. Local authorities have a statutory duty to secure sufficient school places within their areas.	Janet Taylor David Hawes Janine Lawford
P5.2	Ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.	Criterion 2 of Policy JP-P5 highlights the need to work with education providers to forecast likely changes in demand for school places, and where appropriate, requiring housing developments to make a sufficient financial contribution and/or set aside land for a new school, proportionate to the additional demand they would generate. Notwithstanding this, the allocation policies in the PfE, set out the specific infrastructure requirements for that development, including education where relevant. Details are available in the relevant allocation topic papers. Therefore, no change is considered necessary.	David Hawes Tina Brown Edward Beckmann Maureen Buttle
P5.3	Ensuring there is an adequate supply of sites for schools is essential and will ensure that the local authorities within the Greater Manchester area can swiftly and flexibly respond to the existing and future need for school places over the plan period.	Local authorities have a statutory duty to secure sufficient school places within their areas. To ensure the delivery of sufficient school places to respond to the demands from new housing, criterion 2 of Policy JP-P5 supports this approach by highlighting the need to work with education providers to forecast likely changes in demand for school places. Where appropriate, housing developments will be required to make a sufficient financial contribution and/or set aside land for a new school, proportionate to the additional demand they would generate. Notwithstanding this, the site allocation policies in the PfE, set out the specific infrastructure requirements for that development, including education where relevant. Details are available in the relevant allocation topic papers. Therefore, no change is considered necessary.	Janet Alldred Frances Davidson Marie Williamson Anne Isherwood Peter Christie E Bowles Janet Taylor David Hawes Steven Brown Tina Brown Edward Beckmann Janine Lawford Matthew Chandler

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Alison Doherty Glenn Dillon Ann Guilfoyle
P5.4	Pupil yield factors should be used to understand the number of children likely to arise from housing developments and the associated need for school places. These should be based upon evidence from recent developments; thereby matching school census data to housing developments in order to determine actual pupil numbers.	Criterion 2 of Policy JP-P5 highlights the need to work with education providers to forecast likely changes in the demand for school places. It is for each Local Education Authority to determine the appropriate process by which they determine pupil yield factors. Therefore, no change is considered necessary.	Janet Allred Frances Davidson Marie Williamson Anne Isherwood E Bowles Janet Taylor Steven Brown Tina Brown Edward Beckmann Janine Lawford Laura Charlotte Alison Doherty Glenn Dillon Ann Guilfoyle
P5.5	When new schools are developed, local authorities should also seek to safeguard land for any future expansion where demand indicates this might be necessary.	See response to P5.3 above.	Matthew Chandler
P5.6	Whilst facilities, knowledge and universities are rightly areas of focus, there is little emphasis on the importance of the development of skills that are essential for the workplace and key to greater social mobility, i.e., high quality, well supported work-based learning needs.	Criterion 1 of Policy JP-P5 refers to adult training, which could include work-based learning. Additionally, criterion F of Policy JP-J1 seeks agreement with employers and developers, including housebuilders, to enter into local labour and training agreements through planning obligations and other mechanisms where appropriate. Therefore no change is considered necessary.	Colin Walters
P5.7	Approach is out of sync with education policies.	Policy JP-P5 sets out an appropriate policy framework to promote enhancements in education, skills and knowledge and is consistent with national planning policy, specifically NPPF (paragraph 95). Therefore no change is considered necessary.	Kim Scragg
P5.8	Build new schools before new housing starts.	Policy JP- D2 states that new development must be supported by the necessary infrastructure, including where appropriate, schools. The timing of	Peter Christie

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		the delivery of new school provision, as part of new developments, or the triggers for receipt of equivalent financial contributions, will be determined at the planning application stage. Therefore no change is considered necessary.	
P5.9	Policy is too general - review policy to that which a land use plan can deliver or influence.	Policy JP-P5 is consistent with national planning policy, specifically NPPF paragraph 95. Together with other policies in the Plan, such as JP-D2, it provides an appropriate policy framework. Therefore, no change is considered necessary.	Gillian Boyle
P5.10	Ensure new places of education have plenty of green spaces for children.	All new schools or expansion of existing facilities will be in accordance with DfE guidelines which will be a matter for consideration at planning application stage. Additionally, criterion 7 of Policy JP-P7 encourages the incorporation of sports facilities in all education settings. Therefore, no change is considered necessary.	Simon Robertson
P5.11	Attention on retaining farming and other countryside education and knowledge is important.	JP-P5 is a strategic planning policy, as such it would not be appropriate to specify the nature of courses relevant. It is considered to set out an appropriate policy framework for enhancements in education, skills and knowledge to ensure our workforce is ready to benefit from new employment benefits. This approach is considered consistent with NPPF. Therefore, no change is considered necessary.	CPRE
P5.12	This policy can be strengthened by including the following: <ul style="list-style-type: none"> • provision of information that confirms, in detail, the required school and nursery places that would result from this Plan and the land supply needed for the construction of any consequent new schools • withdrawal of all Allocations to enable the active involvement of local residents and the commencement of required collaboration to increase inclusion, with a view to the consequential decisions being address in the Local Plans • withdrawal of any Allocation that is not aligned with this Policy 	No change is considered necessary. JP-P5 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for enhancements in education, skills and knowledge. Criterion 2a states that ensuring the delivery of sufficient school places will be through working with education providers to forecast likely changes in the demand for school places. Additionally, Policy D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary school provision. Further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with	Friends of Carrington Moss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		NPPF. The Plan needs to be read as a whole, therefore no change is considered necessary.	
	Policy Comments		
P5.13	Criterion 1- clarify the use of 'accessible' to include for disabled people.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents and NPPF. As appropriate, the supporting text of policies in the Plan provides clarification as to what is meant by the policy and no changes are considered necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
P5.14	Given the predominance of urban apartment developments anticipated in the PFE, this will inevitably require different types of schools to be developed in the future, in more central locations on smaller footprints, and this should really be acknowledged in criterion 2 of this policy.	No change is considered necessary. The type and design of school will be a matter for local decisions at planning application stage. Consistent with national policy, NPPF (paragraph 95), the policy provides an appropriate framework to deliver sufficient school places through working with education providers to forecast likely changes in the demand for school places. Therefore, no change is considered necessary.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Boys & Girls Club of GM
P5.15	Policy should establish a requirement for “early engagement” between developers, local authorities and education authorities.	No change is considered necessary, criterion 2a states that ensuring the delivery of sufficient school places will be through working with education providers to forecast likely changes in the demand for school places. This approach is consistent with national policy, NPPF (paragraph 95). Therefore, no change is considered necessary.	Peel L&P Investments (North) Ltd
P5.16	Delete Provision 2b; whilst seeming reasonable enough, it has no bounding parameters. This proposed Provision has the potential for misuse by both developers and local authorities and is not legally compliant. Under the Education Act, the provision of schooling is the responsibility of the local authority and must remain so.	The proposed modification is not considered necessary. Policy JP-P5 is considered to be consistent with national planning policy, specifically NPPF paragraph 95. Together with the supporting text and the policies in Chapter 12 of the Plan, it is considered that this policy provides a clear policy framework. Therefore, no change is considered necessary.	Jeremy Williams
P5.17	Change the wording of criterion 2 b. to read: Where appropriate, requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate <u>above existing capacity</u> .	The proposed modification is not considered necessary. Policy JP-P5 is considered to be consistent with national planning policy, specifically NPPF paragraph 95. Together with the supporting text and the policies in Chapter 12 of the Plan, it is considered that this policy provides a clear policy framework. Therefore, no change is considered necessary.	Mrs L Thompson John Warhurst Redrow Homes Limited HIMOR, Redrow Homes Limited and VHW Partnership

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P5.18	In order to make the policy workable and more reflective of the nature of Section 106 requirements in respect of the provision of new schools on strategic sites, Redrow consider that the wording of Criterion 2b should be altered as follows: “b. Where appropriate, requiring <u>Should clear evidence exist</u> , housing developments <u>will be required</u> to make a financial contribution to the provision of additional school places and/or set aside safeguard land for a new school, proportionate to the additional demand that they would generate;”	The proposed modification is not considered necessary. Policy JP-P5 is considered to be consistent with national planning policy, specifically NPPF paragraph 95. Together with the supporting text and the policies in Chapter 12 of the Plan, it is considered that this policy provides a clear policy framework. Therefore, no change is considered necessary.	Redrow Homes (Lancashire)
P5.19	Part (2b) should be amended so that it states (additional wording is underlined): Where appropriate, <u>and subject to the site’s viability</u> , requiring housing developments to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate.	The proposed modification is not considered necessary. A two stage Strategic Viability Assessment [03.01.02] and [03.03.04] has been published alongside the PfE Plan. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE plan will be viable, however NPPF paragraph 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Therefore, no change is considered necessary.	Redrow Homes (Trafford) Seddon Homes Ltd GLP Trows LLP and BDW Trading Ltd Seddon Homes Ltd
	Monitoring		
P5.20	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. Therefore, no change is considered necessary.	Friends of Carrington Moss

Policy JP-P 6 Health

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General Comments		
P6.1	In areas of significant housing growth funding must be leveraged through developer contributions to support the demand for health and care services.	JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate policy framework for the provision of health facilities. Additionally, Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health facilities, further details of which can be found in the relevant allocation topic papers. The plan needs to be read as a whole, therefore no change is considered necessary.	Frances Davidson Marie Williamson Janet Taylor Sheila Tod
P6.2	<p>The need for developers and plan makers to work with health care providers cannot be underestimated, and planning policies and site assessments should be informed by ongoing engagement with them. The policy should require “early collaboration” with CCGs to underpin the delivery of such facilities.</p> <p>Similarly, LPAs should engage with the relevant NHS bodies - not only at local plan making stage but as planning applications for large residential developments within the Greater Manchester come forward.</p>	JP-P6 is a strategic planning policy. Consistent with NPPF it sets out an appropriate policy framework for the provision of health facilities. Additionally, Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health facilities, further details of which can be found in the relevant allocation topic papers. The plan needs to be read as a whole, therefore no change is considered necessary.	Frances Davidson Marie Williamson Janet Taylor Sheila Tod Peter Christie E Bowles David Hawes Steven Brown Tina Brown Matthew Chandler Kate Tod Julie Jerram Jane Barker Christopher Russell Peel L&P Investments (North) Ltd NHS Property Services Ltd
P6.3	The recognition that improvements in health facilities will be supported, including where required to respond to changing needs and demands of residents, is welcomed.	Support noted and welcomed.	Peter Christie Janet Taylor David Hawes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Christopher Russell
P6.4	Open spaces are needed for our physical and mental health and our wellbeing.	Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the provision of health facilities. The Greener Places chapter and Policy JP-P1 provide an appropriate strategic policy framework in relation to provision of open spaces for physical and mental health. The plan should be read as a whole, therefore no change is considered necessary.	Janet Millett Alan Sheppard Judith Sheppard Michael Reeve Janet Taylor John Williams Julie Jerram City of Trees Mark Haynes CPRE
P6.5	Green spaces are needed to mitigate air quality. More development on green spaces leads to busier roads resulting in higher emissions which impacts on air quality and affects our physical health and our wellbeing.	<p>Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. Policy JP-S 6 Clean Air provides an appropriate strategic policy framework in relation to air quality.</p> <p>In relation to traffic and air pollution, paragraph 5.49 highlights that the primary focus is on transport given its primary contribution to air pollution, therefore regard should be had to transport policies elsewhere in the Plan. The districts and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. This is set out in the GM Transport Strategy 2040 [09.01.01], Our Five Year Transport Delivery Plan 2021-2026 [09.01.02], and the Right Mix Technical Note: [09.01.03].</p> <p>The Greener Places Chapter 8 and policy JP-P1 provide an appropriate strategic policy framework in relation to open spaces.</p>	Brenda Foley Alison Doherty Julie Jerram CPRE

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The plan should be read as a whole, therefore no change is considered necessary.	
P6.6	Put doctors and dentists in place before even starting to develop site.	Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health facilities, further details of which can be found in the relevant allocation topic papers. The Plan needs to be read as a whole, therefore no change is considered necessary.	Peter Christie David Hawes
P6.7	Policy too general, review policy to be more useful in ensuring development and the use of land and property meet the aims of the policy.	No change is considered necessary. Policy JP-P6 sets out a strategic policy framework for health (including the requirement that new development, as far as possible, makes a positive contribution to health and well-being). Together with other policies in the Plan, such as Policy JP-D2 and the allocation policies, the Plan provides an appropriate strategic policy framework to address this matter, consistent with the NPPF.	Gillian Boyle
P6.8	The policy fails to tackle some of the key contributory factors contributing to physical inactivity, obesity and ill-health, such as excessive car usage.	Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. Policies elsewhere in the Plan, including policy JP-P7 and those within the Greener Places and Connected Places chapters promote physical activity and reduced car dependency. The Plan should be read as a whole, therefore no change is considered necessary.	Friends of the Earth
P6.9	Public houses can make a positive contribution to emotional wellbeing by providing community spaces and combatting loneliness and isolation. It is expected, therefore, that a balanced view will be taken of the contribution public houses make to health & wellbeing.	No change is considered necessary. Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the health. The role of community venues is recognised in Policies JP-P1 and JP-P3. The Plan should be read as a whole.	Bolton CAMRA Trafford & Hulme CAMRA GM CAMRA
P6.10	Policy should make a specific reference to GI being an integral part of any new development.	No change is considered necessary. Consistent with NPPF, policy JP-P6 sets out an appropriate strategic policy framework for the health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. As recognised in paragraph 9.32, a range of co-ordinated measures will be needed to support improvements in health and well-being. Policies elsewhere in the Plan, especially within the Greener	City of Trees

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Places Chapter, provide the policy framework in relation to green infrastructure and Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The Plan should be read as a whole.	
P6.11	<p>This policy can be strengthened by including the following:</p> <ul style="list-style-type: none"> • provision of evidence to confirm the Plan is supported by sufficient health and social care services for new and existing residents • provision of evidence, for each Allocation, to confirm that there will not be a negative health impact for existing residents as a consequence of these developments • withdrawal of any Allocation that is not aligned with this Policy. 	<p>No change is considered necessary. JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for health. Further evidence of this approach can be found in the GM Population Health Plan 2017-2021 and GM Health and Social Population Health Plan 2017-2021. Additionally, Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies are supported by a proportionate evidence base, detailing the infrastructure required to support the development, including where necessary health provision and / or mitigation required, further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF as the Plan should be read as a whole.</p>	Friends of Carrington Moss
	Policy Comments		
P6.12	<p>Criterion C should be removed as there is no criteria set out for when a Health Impact Assessment is required.</p>	<p>Criterion C requires new development proposals to be supported by a Health Impact Assessment (HIA) where an Environmental Impact Assessment is required, as well as other proposals where the local planning authority considers it appropriate (due to their nature or proximity to sensitive receptors). Further clarification is given in paragraph 9.33. No changes are therefore considered necessary.</p>	Redrow Homes (Trafford)
P6.13	<p>Criterion 1 should be amended so that it states (additional wording is underlined below):</p> <p>Requiring, where appropriate, <u>and subject to the site's viability</u>, the provision of new or improved health facilities as part of new developments that would significantly increase demand.</p>	<p>The proposed modification is not considered necessary. A two stage Strategic Viability Assessment [03.03.01], [03.01.02], [03.03.03] and [03.03.04] has been published alongside the PfE Plan. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF paragraph 58 also provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>	Redrow Homes (Trafford) GLP Trows LLP and BDW Trading Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
P6.14	Rather than applying a blanket approach, the policy should identify which sites and/or types of development may require a HIA, who will be consulted, and what should be considered in determining whether HIA is needed.	Criterion C requires new development proposals to be supported by a Health Impact Assessment (HIA) where an Environmental Impact Assessment is required, as well as other proposals where the local planning authority considers it appropriate (due to their nature or proximity to sensitive receptors). Further clarification is given in paragraph 9.33. No changes are therefore considered necessary.	Emery Planning
P6.15	Additional text to be added: 'To better support the delivery of wider health strategies the disposal or change of use of existing community facilities will be acceptable if it is shown that the disposal of assets is part of a wider estate reorganisation programme to ensure the continued delivery of public services and related infrastructure, such as those being undertaken by the NHS. Evidence of such a programme will be accepted as a clear demonstration that the facility under consideration is neither viable nor needed and that adequate facilities are or will be made available to meet the ongoing needs of the local population. In such cases no marketing will be required.'	No change is considered necessary. JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for health provision. It does not necessarily preclude the redevelopment of existing facilities; this would be a matter for consideration at the local level on a site by site basis. Further evidence of this approach can be found in the GM Population Health Plan 2017-2021 .	NHS Property Services Ltd
P6.16	Site promoters and developers must be encouraged to consider the health impacts of their proposed developments from the outset. Whilst the Policy JP-P6 includes strategic health policy, it should also stipulate that there should be increased access to developer contributions for health within the Places for Everyone Plan.	No change is considered necessary. JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for health; including the requirement that new development, as far as possible, makes a positive contribution to health and well-being. Policy JP-D2 states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. The relevant allocation policies detail the infrastructure required to support the development, including where necessary health provision, further details of which can be found in the relevant allocation topic papers. This approach is considered consistent with NPPF, as the Plan should be read as a whole.	NHS Property Services Ltd
P6.17	Request recognition for the SRF associated with Wythenshawe Hospital across the Plan.	No change is considered necessary. JP-P6 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for health provision. Reference to site specific planning frameworks would not be appropriate in such a policy. Appropriate site specific details in respect of this matter can be found in policy JPA3.1 and the related topic paper [10.01.57] .	Manchester University Hospitals NHS Manchester University Hospitals NHS

Policy JP-P 7 Sport and Recreation

Row	Summary of issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	General Comments		
P7.1	The plan should explicitly confirm that the release of current sports pitches to meet the need for new homes will be considered acceptable where the provisions of national policy are met.	No change is considered necessary. Policy JP-P7 is considered to be consistent with NPPF paragraph 99 and provides an appropriate strategy for supporting sport and recreation.	Colin Walters Frances Davidson Gillian Boyle
P7.2	The plan should allow new development to enhance existing sport and recreation provision (in quality and quantity terms) both on and off site.	No change is considered necessary. Policy JP-P7 criterion 4 provides an appropriate policy framework to achieve this.	Frances Davidson Collette Gammond Brenda Foley
P7.3	Families and children need local parks and open spaces if they are to lead healthy lives.	Noted, no change is considered necessary. JP-P7 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for provision of sport and recreation. Policies elsewhere in the Plan, especially those within Greener Places, provide protection in relation to green infrastructure such as parks and other open spaces, with further details set out in the Natural Environment Topic Paper [07.01.26] . The Plan should be read as a whole.	Frances Davidson Collette Gammond Helen Lomax
P7.4	Refer to the Heritage England register of parks and the importance of these as inner city/ urban oases.	The supporting text of JP-P 2 refers to a number of key sources of information, including the National Heritage List for England, which includes within it, historic parks (paragraph 9.12). Additionally, the Heritage Topic Paper [08.01.12] (page 29) recognises the Register of Parks and Gardens which classifies designated parks and gardens using the same designations as other heritage assets. No change is considered necessary.	Terence Kelly
P7.5	Retain green spaces which allow outdoor activities such as walking, running, dog walking, cycling and horse riding for example, allowing people to have a link to the natural environment and the health benefits, mentally and physically, of being outside.	No change considered necessary. JP-P7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of sport and recreation facilities. Paragraph 9.37 acknowledges that the provision of sport and recreation facilities is strongly linked to the provision of green infrastructure. Clause 6 of the policy, which seeks to protect and enhance the public rights of way network, and other policies in the Plan, including those within the Greener Places chapter (JP-G 2 and JP-G 6) seek to protect and enhance green infrastructure and green spaces, with further details set out in	Kim Scragg Gillian Boyle Brenda Foley Julie Jerram

Row	Summary of issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		the Natural Environment Topic Paper [07.01.26] . The Plan should be read as a whole.	
P7.6	It is crucial that the evidence base on existing and proposed green spaces is fully integrated with the housing supply evidence to ensure there is no double counting, as this will either lead to the under delivery of much needed housing or a shortage of green spaces, both of which are to be avoided.	Noted, no change considered necessary. The approach to identifying the land supply is considered to be consistent with NPPF and NPPG. Further details can be found in the Housing Topic Paper [06.01.03] . The requirements for open space and recreation as part of new developments has been taken into account when estimating the capacity of the sites identified in the housing land supply.	Highgrove Strategic Land Ltd Rowland Homes Ltd PD Northern Steels Peter and Diane Martin Boys & Girls Club of GM
P7.7	This policy can be strengthened by including: <ul style="list-style-type: none"> • provision of evidence for each Allocation to demonstrate that there will be no impact on existing sportsmen and women from the increased air and noise pollution that will arise during and following development; • a requirement in the Policy that air quality monitoring should be undertaken at all GM sports and recreational facilities (indoor and outdoor) and actions should be taken to mitigate any poor air quality standards that arise; • that new sports and recreation facilities should be located in areas with low air pollution; • withdrawal of any Allocation that is not aligned with this Policy. 	JP-P7 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for sport and recreation. Policy JP-S6 Clean Air sets out a comprehensive range of measures to support improved air quality across the Plan, including determining planning applications in accordance with the most recent development and planning control guidance. Additionally, the allocation policies in PfE provide an appropriate policy framework to deal with this matter and are supported by what is considered to be a proportionate and appropriate evidence base. Details are available in the relevant site allocation topic papers. It is not within the scope of JP-P 7 to identify locations for new sport/recreation provision, which is to be determined at the local level. As the Plan should be read as a whole, no change is considered necessary.	Friends of Carrington Moss
	Supporting Text and Policy Comments		
P7.8	Sport England objects to para 9.38 and clauses 3, 4 & 7 suggesting an evidence based rather than standards based approach be adopted. NPPF no longer requires local standards for sports provision. Sport England's suggested amendment: Para 9.38 remove references to accessibility standards for sports facilities and replace with a separate sentence or paragraph:	JP-P 7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities. Whilst clause 3 refers to the inclusion of recreation standards, it is clear that this would only be where appropriate and having regard to evidence of existing and future needs. Consistent with NPPF, paragraph 98, policies in district local plans would therefore be based on up-to-date assessments. Whilst it is considered that this proposed wording could	Sport England Emery Planning Redrow Homes (Trafford)

Row	Summary of issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>"The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach."</p> <p>Sport England's suggested amendments: remove references to standards for sports facilities and replace with a separate clause:</p> <p>Criterion 3 - Where appropriate setting out more comprehensive and detailed recreation standards in district local plans, having regard to existing and future needs. The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach.</p> <p>Criterion 4 - Requiring new development to support the achievement of strategic and local plan standards by providing new and/or improving existing facilities commensurate with the demand they would generate, ensuring that they meet accessibility standards. The provision of sports facilities will be determined by individual local authorities through an evidence based rather than standards based approach.</p> <p>Criterion 7 - Encouraging the incorporation of a sports facilities mix in all education settings, that meet both curriculum and local community sport needs as identified by an up to date Local Authority Sports Needs Assessment, and made available for community use where possible.</p>	<p>improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.</p>	
	Policy Comments		
P7.9	<p>Criterion 2 should clearly define how the 'common standard' for play provision is to be established, e.g. whether it will be through a Plan-wide SPD, or through individual District's SPDs or Local Plans?</p>	<p>No change is considered necessary. JP-P7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities.</p>	<p>Redrow Homes (Lancashire) Peel L&P Investments (North) Ltd Highgrove Strategic Land Ltd</p>

Row	Summary of issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	If a GM-wide standard is to be developed it should be included within PfE itself, given that it will form part of the local Development Plan for the constituent authorities.		Rowland Homes Ltd PD Northern Steels Peter and Diane Martin
P7.10	Criterion 5 appears to go against Secured by Design principles which encourage natural surveillance of play and recreation areas to help reduce the fear of crime and general design principles to integrate such activity with neighbouring uses, creating sustainable and inclusive neighbourhoods. This criterion does not necessarily add anything to the policy and so questions whether it is appropriate to include it under Policy JP-P 7.	No change is considered necessary. The Plan should be read as a whole and Policy JP-G 6 requires development to support the positive use of nearby green spaces, such as by providing natural surveillance. In seeking to minimise potential for complaints, clause 5 of JP-P 7 merely recognises that this can occur in some instances and measures should be taken to minimise this. It does not preclude natural surveillance.	Redrow Homes (Lancashire)
P7.11	The policy refers to future local authority policies which have not yet been written or adopted. The requirements outlined will be addressed specifically in the local plans of the relevant GM authorities and this policy should not refer to these. Furthermore, the policy has not been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirement needs. Criterion (3) and (4) should be deleted.	No change is considered necessary. JP-P 7 is a strategic planning policy; it establishes a strategic policy framework for the protection and enhancement of high quality and accessible sports and recreation facilities. The approach proposed in clauses 3 and 4 is considered consistent with NPPF paragraph 28 which confirms it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development' in accordance with NPPF paragraph 98 the detailed policies set out in individual local plans will be based on individual districts' assessments of open space and playing pitch requirements.	Redrow Homes (Trafford)
	Monitoring		
P7.12	The KPIs need to be updated to ensure they measure all aspects of this Policy.	No change is considered necessary. 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