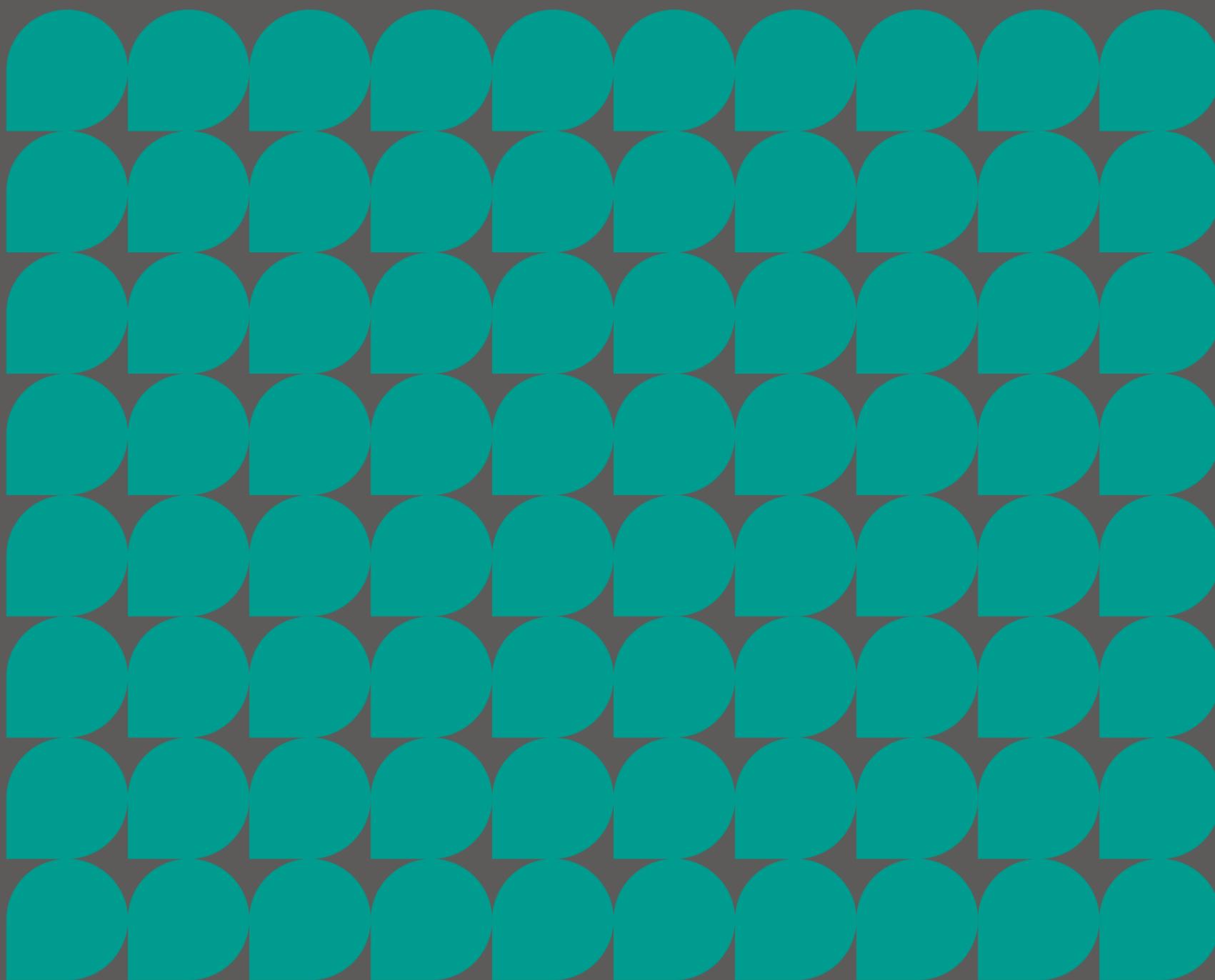


# Places for Everyone

Connected Places Issues Summary

February 2022



# Chapter 10 – Connected Places

A summary of the issues raised in relation to the policies within PfE 2021 Chapter 10 Connected Places and the relevant respondents to PfE 2021 is set out below:

## PfE 2021 Policy JP-C 1 – An Integrated Network

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Support for policy</b>		
C1.1	Support for the proposed ambitious programme of investment through the policy, including creating a larger integrated rapid transit network with orbital connections to local centres.	Support noted.	Redleaf VI (Ashton) Limited Partnership and Ellandi Highgrove Strategic Land Ltd
C1.2	Support for focus on main town centres accessibility to support regeneration and attractive places for residents. Potential extension of Ashton to Stalybridge Metrolink supported.	Support noted.	Middleton SC Limited
C1.3	PfE document meets Objectives 1, 3, 5 and 6.	The Plan, as a whole, is considered to set out an appropriate strategic policy framework to deliver the overall Vision and <u>all</u> the Objectives. No changes are considered necessary.	Stephen Cluer
C1.4	Support the policy in minimising the need to travel. This could be reworded to say urban concentration to reuse brownfield land as a priority. Under point 5 please mention as c. public transport, such as buses.	Support for the policy noted.  PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs (JP-S1). The Plan should be read as a whole and therefore this does not need to be reiterated or reworded in policy JP-C 1. No modifications are considered necessary.  The Global Street Design Guide is set out in terms of people and their choice of mode rather than specific vehicles. Public transport users are included under point b – therefore no modifications are considered necessary.	CPRE

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Development Location</b>		
C1.5	Concern over the number of developments on greenfield sites and their local impacts upon factors such as car use, parking, emissions, air pollution, light, noise, human health and capacity of local infrastructure.	<p>A number of policies in the Plan provide a sufficient policy framework to address these issues. Policies JP-C1 to C7, JP-P1, JP-P5 and JP-P6 require new development to be designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, healthy and sustainable environments, and must include, where appropriate, local infrastructure such as green spaces, schools and medical facilities.</p> <p>All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate. Allocations policies are informed by an assessment of cumulative impacts through the respective <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> which concluded that the potential impacts of the allocations on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF.</p> <p>The <b>Transport Strategic Modelling Technical Note</b> <a href="#">[09.01.04]</a> examines the potential cumulative impact of the plan as whole on the transport network.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> recognises the potential negative impact of travel and transport and sets out our approach to minimise issues on the network as a whole.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	Stephen Cluer
C1.6	The development proposed in the Northern Gateway area and the housing proposals on greenbelt and open land will be car based and unattainable.	<p>Northern Gateway Policies JP Allocation 1.1 and 1.2, and all other allocations policies, include measures to deliver public transport accessibility, sustainable transport infrastructure, and mitigate other highways impacts.</p> <p>A number of policies in the Plan provide a sufficient policy framework to address the issue of car dependency. Policies, JP-C1, JP-C3, JP-C4, JP-C5, JP-C7 and JP-P1, JP-P5 and JP-P6 state that new development must be supported by sustainable transport modes, and include, where appropriate, infrastructure such as schools and medical facilities to reduce the need for travel. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> outline interventions proposed for other housing proposals. These have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance.</p>	Gillian Boyle

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C1.7	<p>Land has been allocated for housing and industrial development without any regard for the transport network. Public transport should be at the centre of decision making for all developments and building on greenfield sites increase the reliance on car due to these areas being further away from public transport provision. This will exacerbate congestion, carbon emissions, and health issues.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). 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 <b>Employment Topic Paper</b> [05.01.04], the details of the housing land needs and supply can be found in the <b>Housing Topic Paper</b>[06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the <b>Green Belt Topic Paper</b> [07.01.25].</p> <p>The majority of land identified for development within the PfE plan is on land within the existing urban area and will benefit from access to public transport provision as outlined in <b>Existing Land Supply and Transport Technical Note</b> [09.01.05] and associated <b>Addendum</b> [09.01.06].</p> <p>The PfE Site Allocation Process <b>Site Selection Background Paper</b> [03.04.01] provides methodology used to identify allocations, with consideration of land with existing public transport accessibility being a key factor (<b>Appendix 6 Site suitability methodology</b> 03.04.08).</p> <p>Allocations are assessed on their unique and cumulative impacts through the respective <b>Transport Locality Assessments</b> [09.01.07 through to 09.01.28] and associated addendums, and the <b>Transport Strategic Modelling Technical Note</b> [09.01.04], to ensure that impacts can be mitigated and are not considered to be severe.</p>	<p>Stephen Cluer Lucia Sollazzi-Davies</p>
C1.8	<p>Proposed developments are not strategically located to local transport hubs and key routes, because they are positioned on Greenfield land, and therefore will increase car use and congestion on local roads and the key route network. Investment in public transport in these areas will be extremely expensive and unlikely to mitigate realistic concerns in relation to building on greenfield sites.</p>	<p>The relevant allocation policies are supported by a proportionate evidence base, detailing the transport infrastructure and other mitigation required to support the development.</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits from access to public transport) as set out in the <b>Existing Land Supply and Transport Technical Note</b> [09.01.05] and associated addendum [09.01.06].</p> <p>The PfE Site Allocation Process <b>Site Selection Background Paper</b> [03.04.01] outlines the process followed to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in <b>Appendix 6 Site suitability methodology</b> [03.04.08].</p>	<p>Stephen Cluer</p>

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		<p>The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> analyse the impact of each allocation on the local transport network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance.</p> <p><b>Strategic Viability Assessments</b> <a href="#">[03.01.01 – 03.01.04]</a> have been published alongside the PfE Plan to demonstrate viability.</p>	
C1.9	Lack of provision of schools does not fit with walk to school policy, and therefore increases traffic and environmental issues.	Within the PfE Plan, Policy JP-P 5 considers provision for Education, Skills and Knowledge including sufficient delivery of school places. For each allocation policy there is reference to the need for provision for schools where applicable. The Plan should be read as a whole, therefore no change is considered necessary.	Neil Campbell Stephen Cluer
C1.10	The approach to major development allocations in the Green Belt undermine the stated key policy aims, such as delivering sustainable patterns of development that minimize the need to travel and reliance on car.	<p>While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the site allocations are supported by an appropriate evidence base which addresses matters such as those in the representation.</p> <p>Policy JP-C1 recognises the need to deliver sustainable patterns of development and Policy JP-C7 sets out the Transport Requirements of new development, requiring development of the site to incorporate mitigation to reduce the need to travel and reliance on cars. Therefore, it is considered that development of the allocations, in accordance with the allocation policies, would be in accordance with wider policies in the Plan.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently (JP-S1). By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver the vision and objectives of the Plan. The approach to growth and spatial distribution is set out in the <b>Growth and Spatial Options Paper</b> <a href="#">[02.01.10]</a>.</p> <p>The <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in <b>Appendix 6 Site suitability methodology</b> <a href="#">[03.04.08]</a>.</p> <p>The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits from access to public transport) as set out in the <b>Existing Land Supply and Transport Technical Note</b> <a href="#">[09.01.05]</a> and associated addendum <a href="#">[09.01.06]</a>.</p>	Friends of the Earth
	<b>Public Transport</b>		

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C1.11	There is no integrated network – in relation to Timperley Wedge.	<p>The policies in the Connected Places chapter of the Plan provide a sufficient policy framework to support the creation of a better integrated network, with policies JP-C1, JP-C4 and JP-C7, in particular, ensuring new developments are well integrated into the network.</p> <p><b>Policy JP Allocation 3.2</b> includes measures to achieve transport integration and accessibility for the Timperley Wedge allocation. This is informed by the <b>Transport Locality Assessments – Cross-boundary [09.01.07]</b> document and associated addendum <a href="#">[09.01.19]</a> for the Timperley Wedge allocation which demonstrate that a range of interventions will be required to allocate the site and integrate it into the existing network. The Plan should be read as a whole, therefore no change is considered necessary.</p>	Peter Christie
C1.12	Improvements in local public transport services, including bus, rail capacity and coverage are required in various locations across Greater Manchester (including Godley and Hattersley, Mosley Common, Little Hulton / Walkden).	<p>Transforming transport infrastructure and services by securing investment in new and improved transport infrastructure and services is a key component of Policy JP-C 1 in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity.</p> <p>An ambitious programme of investment in public transport is set out through the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> and accompanying <b>Our Five Year Transport Delivery Plan 2021-2026 [09.01.02]</b>. This includes proposed investment in rail and bus capacity, coverage and service quality.</p> <p>The GMCA has also committed to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards. An introduction to Bus Reform is set out in the <b>Transport Topic Paper [09.01.29]</b>.</p>	<p>E Bowles</p> <p>Steve Mosby</p> <p>Julie Riley</p> <p>Ellen McInnes</p>
C1.13	More detail needed on Mayoral bus franchising proposals and the advantages/disadvantages of a Metrolink city centre tunnel. The lack of mention of the potential for Metrolink along Oxford Road/Wilmslow Road is a missed opportunity.	<p>The supporting text for Policy JP-C3 is considered to provide a sufficient level of detail to address these matters therefore no change is considered necessary. The <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> includes the background detail underpinning the policy in relation to bus franchising proposals and the potential Metrolink tunnel. An introduction to Bus Reform is also set out in the <b>Transport Topic Paper [09.01.29]</b>.</p> <p>Recent transformational walking and cycling schemes, infrastructural improvements, and removal of traffic on some sections of the Oxford Road/Wilmslow Road corridor have been a priority for funding in recent years. This is reflected in the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> with the corridor now acting as a high frequency and high-quality bus and active travel corridor between central Manchester and Didsbury.</p>	Martin Arthur

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C1.14	Traffic congestion is a key challenge...but this statement could be qualified by a commitment to, for example, provide more reliable, frequent and affordable public transport in all areas of GM, reduce opportunities for car parking and to increase the number of park and ride options.	The policies in the Connected Places chapter of the Plan provide a sufficient policy framework to address this matter. Traffic congestion is recognised as an issue within the supporting text of JP-J1, JP-C1, JP-C4 and other policies in the PfE Plan and the <b>Greater Manchester Transport Strategy 2040</b> [09.01.01]. Measures to address congestion and improve the public transport network are detailed within Connected Places policies and within <b>Our Five Year Transport Delivery Plan 2021-2026</b> [09.01.02]. No modifications considered to be necessary.	Friends of Carrington Moss
C1.15	Local bus routes have reduced following the introduction of Leigh guided busway.	Future proposed bus improvements highlighted within <b>Our Five Year Transport Delivery Plan</b> [09.01.02] would be complemented by the GMCA's commitment to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards, unavailable in previous bus improvement schemes. An introduction to Bus Reform is set out in the <b>Transport Topic Paper</b> [09.01.29].	Neil Campbell
C1.16	Welcome the improvement to public transport for the north of the area, but it is unlikely to match the viability of the southern areas.	Policy JP-C1 is considered to be consistent with NPPF and provides an appropriate strategy to support sustainable movement which is a key objective of the PfE Plan and NPPF.	Martin Arthur
	<b>Highways, traffic congestion and road safety</b>		
C1.17	Road safety issues due to infrastructure not being able to cope with current/growing levels of traffic. Issues around road infrastructure to accommodate walking and cycling as highways are already constrained. Increased volumes of traffic hazardous for people with visual impairments.	<p>Policy JP-C 1 supports transforming transport infrastructure and services to meet customers' needs by being safe and secure. The policy also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network.</p> <p>The importance of road safety is also recognised within the <b>Greater Manchester Transport Strategy 2040</b> [09.01.01] as one of the seven mutually reinforcing principles (p22), which are applied consistently as Greater Manchester's transport system is improved.</p> <p>GM's ambition is "To reduce deaths on our roads as close as possible to zero and ensure that poor perceptions of personal security are no longer a significant barrier to people using public transport or walking and cycling". Pages 41-42 of the GM Transport Strategy 2040 set out current initiatives to improve the safety of GM's transport system.</p> <p>Our recently published sub-strategy "<a href="#">Streets for All Strategy</a>" sets out how we intend to ensure that the competing needs of different road users (e.g. pedestrians and cyclists) are balanced in a way that supports</p>	<p>Julie Halliwell</p> <p>Maureen Buttle</p> <p>Helen Lomax</p> <p>E Bowles</p>

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		<p>sustainable growth. An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a>.</p> <p>Whilst it is considered that increase reference to road safety could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.</p>	
C1.18	Concerns about an increase in the number of Metrolink stops, Rail stations and park and ride sites for public transport, increasing the number of cars and traffic in local centres, increasing local congestion.	<p>Park and Ride facilities are referenced in the Plan where they are considered to have potential overall benefits to the network.</p> <p>Our approach to Travel Hubs/Park and Ride, new stops and stations is set out within the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>. The Strategy makes it clear that Park and Ride and new locations for Metrolink stops and Rail Stations need to be carefully planned. Travel Hubs/Park and Ride sites need to intercept cars before they reach congested urban roads and transfer drivers to a fast and frequent public transport service (p.64). New Metrolink and Rail Stations will offer alternatives to car use and will be designed to encourage access by walking and cycling.</p>	<p>Julie Riley</p> <p>Ellen McInnes</p> <p>Alan Sheppard</p>
C1.19	New highways are needed to enable improvements to public transport.	<p>A small number of new sections of highway are included within the PfE plan policies to open up some allocation sites and help deliver development – in each case, these new links will help improve public transport by supporting access to stations, creating new routes for bus services, or by enabling road space reallocation for walking, cycling and public transport uses.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> reflects the vital role that highways play within wider transport network. Any highway interventions required are discussed within <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> and within <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>.</p>	Stephen Woolley
C1.20	Congestion charge would impact self-employed people. It seems this is the only way to regulate demand however it is not mentioned within the plan.	There are no proposals for a Congestion Charge within Greater Manchester.	<p>Kim Scragg</p> <p>Martin Arthur</p>
C1.21	Welcome the inclusion of powered two-wheelers alongside cyclists in part 5b but question whether this mode needs its own criteria given the unique and emerging safety challenges of this form of transport.	Comment noted. No modification considered necessary. Policy JP-C1 states that powered two wheelers will be given an equivalent priority to cyclists and public transport users in terms of development and investment decisions. Greater Manchester is currently involved in national trials with e-scooters that will ultimately inform national and more detailed local policy going forward.	<p>Highgrove Strategic Land Ltd</p> <p>Peter and Diane Martin</p> <p>Boys &amp; Girls Club of GM</p>

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	<b>Climate change</b>		
C1.22	Give greater prominence to the importance of climate. This would include relocating text related to climate within the policy justification of Integrated Network, to the beginning of the chapter.	We agree with the importance of the climate crisis. It should be noted that the plan should be read as a whole, and all policies are considered to have equal prominence. No modifications considered to be necessary.	Friends of Carrington Moss
C1.23	Additional residency through more land for housing, without any regard for the transport network, will increase carbon emissions.	<p>The policies within the Connected Places chapter are considered to give due regard to the transport network and tackling carbon emissions. Policies JP-C1 to C7 are considered to provide a sufficient policy framework to address carbon emissions from transport therefore no change is considered necessary.</p> <p>These policies are underpinned by supporting evidence, as set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a>.</p> <p>The Topic Paper summarises GM's <a href="#">5-Year Environment Plan</a> which contains an ambitious target to be carbon-neutral by 2038. The Environment Plan, which is aligned with the PfE Plan policies and the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>, sets out five decarbonisation priorities for transport: increasing use of public transport and active travel modes; phasing out fossil-fuelled vehicles and replacing with zero-emission alternatives; tackling the most polluting vehicles on our roads; establishing a zero-emission bus fleet; and decarbonising road freight and shifting more freight movement to rail and water.</p>	Stephen Cluer Lucia Sollazzi-Davies Ellen McInnes
C1.24	Modal shift must be enabled through investment in sustainable travel including walking, cycling and public transport, and recognising the importance of home-working and mixed land use to reduce travel demand.	<p>Comment noted. PfE policies in the Connected Places chapter and the <b>Greater Manchester 2040 Transport Strategy</b> <a href="#">[09.01.01]</a> support a range of measures to encourage modal shift.</p> <p>The <b>Greater Manchester Transport Strategy 2040 Appendix 1: Right Mix Technical Note</b> <a href="#">[09.01.03]</a> provides further detail on ambitions for modal shift including assumptions on land-use and travel behaviour change.</p>	Friends of the Earth
C1.25	The Plan does not consider electric vehicles – where does the electricity come from for them and will people give up petrol and diesel cars?	<p>The PfE Plan considers the use of electric vehicles within Policy JP-C1 and in para 10.10 of the justification text.</p> <p>Policy JP-C7 Transport Requirements of New Development also requires new development to promote the increased provision of ULEV charging infrastructure including meeting any standards set by local plans.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> outlines our ambition to invest in and expand electric vehicle charging across GM to support the transition to electric vehicles. The <b>Electric Vehicle Charging Infrastructure Strategy (EVCI)</b> is designed to encourage and accelerate the transition from</p>	Colin Walters Anne Isherwood

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		<p>internal combustion engines to electric vehicles, and is summarised in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a>.</p> <p>Electric Vehicles are becoming increasingly popular due to operational cost advantages over traditional Internal Combustion Engine (ICE) vehicles. The UK Government has now committed to phasing out the sale of new petrol and diesel vehicles by 2030 and hybrid vehicles by 2035.</p>	
C1.26	<p>Commitments set out in the Five-Year Delivery plan should be reviewed and investment should be targeted at sustainable options. All new roads should be removed from the plan for further consideration and consultations with residents.</p>	<p>Greater Manchester is committed to maintaining an up-to-date Transport Strategy and Five-Year Delivery Plan throughout the PfE Plan period. This will entail regular monitoring and review of the plan to ensure appropriate investment priorities.</p> <p>A small number of new sections of highway are included within the PfE plan to open up allocation sites and help deliver development – in each case, these new links will help improve public transport by supporting access to stations, creating new routes for bus services, or by enabling road space reallocation for walking, cycling and public transport uses.</p> <p>No changes to the Plan are considered necessary.</p>	<p>Friends of Carrington Moss</p>
	<b>Equestrian provision</b>		
C1.27	<p>No provision for equestrians who are vulnerable legitimate road users. Not consistent with horse riding policy nationally – horse riding should be taken into consideration in walking and cycling infrastructure.</p>	<p>Whilst it is considered that this specific reference to equestrians within the Connected Places chapter of the Plan could improve the clarity and scope of the policy, it is not considered to be a soundness issue, therefore no change is proposed. The issue is adequately covered within our recently published “<a href="#">Streets for All Strategy</a>”, which is a sub-strategy of the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>, which sets out how we intend to ensure that the competing needs of different road users are considered where appropriate.</p> <p>An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> and a Streets for All Design Guide is soon to be published. This guidance will set out how we design streets for all users along with their interface with, for example, leisure routes and public Rights of Way. The needs of specific groups such as disabled people, emergency services, people using powered two wheelers and horse riders will be considered as part of the design guidance.</p>	<p>Kim Scragg The British Horse Society</p>
	<b>COVID19</b>		
C1.28	<p>Implications and lessons from COVID19 need to be considered. It is clear that peak travel will not recover to previous levels. It is unclear, and</p>	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that</p>	<p>Stephen Woolley Martin Arthur</p>

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	will be some time, what the long term effects of covid will actually be on public transport.	<p>there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a>.</p> <p>We also recognise that the spread of Covid-19 had a profound impact on the ways in which we work and travel, however, there is currently insufficient evidence to amend the transport assumptions underpinning the PfE Plan. An adaptive planning approach and regular refresh of our strategic ambitions aim to allow flexibility in our approach, while keeping in mind our long-term vision for the “Right Mix” as set out in the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>.</p>	
	<b>Plan delivery</b>		
C1.29	Little detail on how required infrastructure will be paid for	<p>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 NPPF and NPPG. Districts Infrastructure Funding Statements provide details of monies secured (and spent) over recent years in relation to S106 agreements.</p> <p>As described in the supporting text to Policy JP-C1, <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> is the framework for transport investment across GM and should be read alongside the Plan. The Delivery Plan also provides a detailed overview of funding streams.</p> <p>Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions set out in the Five-Year Delivery Plan. It is envisaged that further multi-year infrastructure funding settlements will be awarded in future years.</p> <p>With regard to the transport interventions identified on an allocation-by-allocation basis – within the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> – significant developer contributions will be expected to fund necessary interventions.</p>	Christopher Russell
C1.30	What are you going to do to achieve this?	<p>The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. 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 NPPF and NPPG. In particular, the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> outlines the various strategies and implementation routes that are important to achieve delivery of the PfE Plan from a transport perspective. No change is considered necessary.</p>	Ann Guilfoyle

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C1.31	The plan is not considered to be legally compliant.	Comment not relevant to the content of the Connected Places chapter. Matter addressed elsewhere.	Matthew Oxley
C1.32	Scepticism regarding the value of the plan and its policy statements, including their likelihood of delivery and achievement of positive change.	<p>No change is considered necessary. 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 overall framework for transport investment across Greater Manchester is contained in the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> and <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>. This ambitious programme of investment is not unprecedented. Our successful <b>City Regional Sustainable Transport Settlement</b> means that Government Funding of over £1bn funding package will be available over the next five years to help develop and deliver our plans and priorities. It is anticipated the further multi-year funding settlements will be available over the course of the PfE Plan period.</p>	Roy Chapman Jeremy Williams Lucia Sollazzi-Davies
C1.33	The plan duplicates wording provided within other policies in relation to sustainable development and therefore is not consistent within the NPPF. Policy JP-C1 should be removed from the plan.	No change is considered necessary. Policy JP-C1 is considered to be consistent with NPPF and provides an appropriate overarching policy to ensure the improvement of the transport network across the plan area, which is a key objective of the plan and NPPF.	Redrow Homes (Trafford)
C1.34	The words 'access', 'accessible' and 'accessibility', which are used frequently in PfE, are ambiguous and should be clearly defined. In transport, these terms can often mean 'near to public transport route' or 'close to home'. This leads to ambiguity and confusion especially 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 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.	Maggie Griffiths
C1.35	Ensuring other authorities, close to but outside of the GM border are consulted more closely to make sure there is a joined up approach in delivery. The plan also creates jobs and houses	<p>The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan <a href="#">[01.01.01]</a>.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> and <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> were also developed in conjunction with a range of wider stakeholders, including local</p>	St. Helens Council Martin Arthur Edward Beckmann

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	which would be accessed by non-sustainable transport options from outside of GM.	authorities neighbouring Greater Manchester, National Highways, Network Rail, Transport for the North, transport operators, emergency services, Manchester Airport Group and High Speed Two (HS2) Limited. We recognise the need for on-going collaborative working and consultation.	
C1.36	It is not clear how the policy will be addressed through Local Plans or development management processes, and this needs to be clarified to provide more certainty.	<p>It 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’.</p> <p>The delivery of Policy JP-C1 will require a multi-faceted approach involving GM authorities, TfGM and key transport and development partners. The policy reflects the commitments in the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> and <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>. No modifications are considered necessary.</p>	PD Northern Steels Highgrove Strategic Land Ltd Emery Planning
	<b>SRN requirements</b>		
C1.37	This plan does not refer to any infrastructure requirements on the SRN that arise as a result of the planned growth in Greater Manchester.	<p>Each individual <b>Allocations Policy in Chapter 11</b> of the PfE Plan includes reference to SRN infrastructure requirements where these are directly necessary for the site to be allocated.</p> <p>The Allocations Policies have been informed by the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> which set out the process by which the necessary or supporting, transport infrastructure improvements have been identified – including SRN improvements.</p> <p>We recognise the need to continue the collaborative work with National Highways which is currently underway that examines the wider implications of growth on the SRN.</p>	National Highways

## Policy JP-C 2 – Digital Connectivity

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
C2.1	Ensure that full digital connectivity is available within the rural areas around Manchester will support economic growth, whilst reducing development needs.	GMCA are committed to being a digital city-region that puts our residents at the heart of our plans and are working towards our ambitions to be recognised as a world leading digital city-region. This includes all areas of the city-region, urban and rural.  The <a href="#">Greater Manchester Digital Blueprint</a> sets out a three-year approach to meeting our ambitions for our city-region.	Kim Scragg NFU Friends of Carrington Moss
C2.2	Support investment in new and upgraded networks to increase the range and quality of coverage.	The <a href="#">Greater Manchester Digital Blueprint</a> sets out a three-year approach to meeting our ambitions for our city-region. The GMCA has also prepared an <a href="#">Infrastructure Framework 2040</a> to support the delivery of the Plan.	E Bowles Ann Guilfoyle
C2.3	The siting of telecommunications infrastructure should be sensitively considered as it can introduce man-made structures into rural landscapes that are free from development.	This is addressed in NPPF paragraph 115. It is not considered that it needs to be repeated in this policy.	CPRE
C2.4	The policy should refer to ensuring digital connectivity for existing, as well as new residents.	The PfE plan is primarily concerned with new development however the policy does encourage developers to work with telecoms operators to maximise coverage which will benefit existing and new residents. The <a href="#">Greater Manchester Digital Blueprint</a> sets out a three-year approach to meeting our ambitions for the whole city-region.	Ann Guilfoyle
C2.5	Considering we still don't have fibre broadband in some areas this ambition seems to lack actual action.	A priority for the <a href="#">Greater Manchester Digital Blueprint</a> is Digital Infrastructure - delivering high speed digital connectivity over full fibre and 4G & 5G mobile across the whole city region by 2025. The GMCA has also prepared an <a href="#">Infrastructure Framework 2040</a> to support the delivery of the Plan.	Ellen McInnes
C2.6	Clarify the approach to the funding of digital infrastructure to avoid unjustified costs being apportioned to developers.	This policy should be read in conjunction with policy JP-D1 Infrastructure Implementation, including clause 5 – which encourages early dialogue with developers and infrastructure providers; and clause 6 which requires applicants to prepare infrastructure phasing and delivery strategy for strategic sites, including when and who will fund and deliver it.	Peel L&P Investments (North) Ltd
C2.7	Add to the second sentence of the Policy text: 'In making decisions we will support a range of measures, including <u>where practicable</u> .'	The addition of 'where practicable' is considered unnecessary as clause 2, which refers to all new development, includes the phrase 'unless technically infeasible.'	Highgrove Strategic Land Ltd Rowland Homes Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
			PD Northern Steels Paul and Diane Martin Boys & Girls Club of GM
C2.8	Update the Policy (page 203) to confirm that focus will be given to improving connectivity in GM's rural areas and: <ul style="list-style-type: none"> <li>• withdraw any Allocation that is not aligned with this Policy</li> <li>• update the KPIs to ensure they measure all aspects of this Policy.</li> </ul>	<p>No change is considered necessary.</p> <p>In line with the <a href="#">Greater Manchester Digital Blueprint</a> this policy will support the delivery of high speed digital connectivity across the whole city region by 2025.</p> <p>JP-C2 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for digital connectivity. The allocation policies are supported by a proportionate evidence base, detailing the digital infrastructure required to support the development where appropriate. Further details can be found in the relevant allocation topic papers.</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. This approach is considered consistent with NPPF as the Plan should be read as a whole.</p>	Friends of Carrington Moss

## Policy JP-C 3 – Public Transport

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Policy Support</b>		
C3.1	Support for principles of the policy overall. Schemes such as Metrolink Ashton and Stalybridge extensions are well received. In addition, it would be welcomed if specific interventions were included in the policy to help ensure they are delivered, for example Golborne Railway Station.	Support for Metrolink Ashton to Stalybridge extension noted. Whilst it is considered that the proposed wording additions could improve the detail of the policy, it is not considered to be a soundness issue, therefore no change is proposed. All strategically significant infrastructure investment proposals are highlighted in the supporting document <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> – this includes rail capacity studies which are looking at identifying where improvements are needed, alongside opportunities to work with Network Rail and train operators to provide more seats and more services.	Redleaf VI (Ashton) Limited Partnership and Ellandi  Murphy Group
C3.2	Support for the policy as it encourages people to get out of their cars for short and medium length journeys.	Support noted.	Friends of the Earth
	<b>Development Location</b>		
C3.3	New developments should be located near key transport hubs and routes to avoid an increase in carbon emissions.  The allocations considered to be are in remote locations, away from employment sites, that cannot be accessed by public transport – this will increase commuting, car and public transport congestion. Few people have jobs directly on or near enough to public transport routes for this to be a viable option.	Policy JP- C1 provides a suitable policy framework for locating development which will deliver increases in walking cycling and public transport trips.  The allocation <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of access to transport services and facilities.  All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility.  The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> analyse the impact of each allocation on the local transport network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. The Locality Assessment also identify public transport improvements that are necessary, or would support, the allocation in order to promote sustainable transport.	Kim Scragg  Friends of the Earth  Christopher Russell  Colin Walters  Stephen Cluer
C3.4	Concern about the location of the Walshaw allocation having implications for increased levels of car use and carbon emissions – due to limited	The methodology used to identify the allocations is set out in the <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> , this included criterion related to public transport availability.	Christopher Russell

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	access to public transport hubs, poor access to the employment opportunity in Northern Gateway, public transport expense, frequency and reliability.	<p>Policy JP Allocation 9 includes measures to deliver public transport accessibility, sustainable transport infrastructure, and mitigate other highways impacts.</p> <p>The <b>Transport Locality Assessments – Bury – Greater Manchester Spatial Framework 2020</b> <a href="#">[09.01.09]</a> includes analysis of the impact of the Walshaw allocation (in Appendix B p100-140) on the local transport network and has concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. The Locality Assessment also identifies public transport improvements that are necessary or would support the allocation in order to promote sustainable transport.</p>	
C3.5	Increases in the number of houses without access to public transport will increase the number of cars on the roads of GM, making them unsafe.	<p>All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate.</p> <p>The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> identify public transport improvements that are necessary, or would support, the allocation in order to promote sustainable transport. They also analyse the impact of each allocation on the local transport network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance.</p>	Julie Halliwell
	<b>Right Mix</b>		
C3.6	The allocations do not reflect the 2040 Right Mix vision – for example, within New Carrington Allocation area, there are no plans for trains, trams, increases in bus services, but there is a plan for a construction of a new road.	<p>All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility where appropriate.</p> <p>The Allocation Policies are informed by the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> which analyse the potential impact of each allocation on the local transport network and identify the indicative walking, cycling and public transport improvements that are necessary for, or would support, the allocation in order to promote sustainable transport and help achieve the Right Mix vision. Therefore, it is considered that development which is in accordance with the allocation policy, would contribute to achieving the Right Mix vision outlined in paragraph 10.25 of the PfE Plan.</p>	Friends of Carrington Moss
	<b>Public Transport</b>		
C3.7	Local bus and rail services have been removed over time (e.g. local bus routes reduced when the Leigh Guided busway was introduced and reduced rail services from Rochdale (through	Transforming transport services by securing investment in new and improved services is a key component of Policies JP-C 1 and JP-C 3 in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity. No change to the policy is considered necessary.	Neil Campbell Ann Guilfoyle

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	Shaw) to Manchester). This has led to increased congestion on the road network in these areas.	Most GM bus services are currently run by private operators on a commercial basis. The GMCA has committed to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards. An introduction to Bus Reform is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> .	
C3.8	There needs to be more connections and greater capacity for suburban commuters.	The policy JP-C3 supports specific capacity increases on Greater Manchester's rail and bus network and enhancing connections across Greater Manchester. The policy refers to <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> where all strategically significant infrastructure investment proposals for improved connections and greater capacity are highlighted. This is part of the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> setting out our ambitions to improve the transport network across Greater Manchester. No change to the policy is considered necessary.	Ellen McInnes
C3.9	Public transport does not provide a good alternative to the car because it is considered to be poor quality, infrequent, and unreliable. This is considered to be a particular problem for people who link trips or who need to travel at a set time (such as for the school run or commuters).	Policies JP-Strat 14, JP-C1 and JP-C3 and the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our policies and ambitions to improve the public transport network across Greater Manchester. The GMCA has committed to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards. An introduction to Bus Reform is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> . No change to the policy is considered necessary.	E Bowles Christopher Russell Matthew Chandler
C3.10	Better investment needed in trams/connections to Wigan, guided busway doesn't go far enough.	The policy JP-C3 notes support for enhanced connections to town centres and refers to <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> which contains all strategically significant infrastructure investment proposals. This includes potential extensions of the guided busway services and improvement to the Atherton Rail Line for use by Tram-Train services.	Steve Mosby
C3.11	Bus Park and Rides should be more extensive compared with only two sites at present, and more parking is required at train stations.	Policy JP-C 3, point 7, notes support for improved access to rapid transit which would include park and ride where appropriate. Within paragraph 10.42 of the policy justification, the recognition of improved first/last mile solutions for public transport is noted. <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> outlines our commitment to the introduction of appropriate Travel Hubs/Park and Ride facilities.	Martin Arthur E Bowles
C3.12	Public Transport is too expensive and often twice the price of other cities. Modes differ in price and as a result some modes economically exclude some GM residents.	The policy JP-C 3 point 5, supports better integration between services and modes. Furthermore, our ambitions, set out in the plan policies and the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> aim to develop an affordable and integrated transport system to enable people to move seamlessly between services on a single, easy-to-use network with affordable smart ticketing. The GMCA has	Helen Lomax E Bowles

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		committed to reforming the bus market using the powers within The Transport Act 2000 (as amended) to introduce a franchising model which will bring greater local control of routes, frequencies, timetables, fares, ticketing, network integration and quality standards. An introduction to Bus Reform is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> .	
C3.13	Public Transport is unsafe.	Policy justification (JP-C 1 Integrated Network) paragraph 10.27 notes the delivery of safety and security programmes across the transport system to eliminate barriers to travel. Improving safety on public transport is a key policy of the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> . The strategy sets out our commitment to work with operators and other partners to improve safety and to tackle crime and anti-social behaviour on the transport network.	Helen Lomax
C3.14	Limited opportunity to increase frequency on rapid transit network (e.g. guided busway or Metrolink). Additional stops won't be effective because trams/buses are already too congested.	Policy JP-C3 and <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> outlines our commitment to increasing the capacity of rapid transit services (including purchase of new vehicles) where possible and highlights where we believe additional stops will have benefits to serve local communities. As part of an approach to enable capacity to be provided on key routes, policy JP-C 3 supports increased capacity at bottlenecks such as Manchester city centre, which would convey benefits across Greater Manchester.	Matthew Chandler June Clough
C3.15	Service and infrastructure upgrades are required, however, they are often promised and not delivered (e.g Walkden Station).	Greater Manchester has a good track record of delivery across a range of significant infrastructure schemes – such as Metrolink and the Guided Busway – and we work closely with Network Rail seeking to improve services and stations across the rail network. Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions set out in <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> . It is envisaged that further multi-year infrastructure funding settlements will be awarded in future years over the course of PfE plan period.	Matthew Chandler
C3.16	Additional tram stops and park and ride provision are needed to increase park and ride capacity (e.g Shaw and Crompton Metrolink is at capacity). The proposed new Metrolink stop at Cop Lane is welcomed and further stops could be introduced on Rochdale-Oldham Metrolink line (e.g. Dunwood Park).	Policy JP-C 3 notes support for improved access to rapid transit through first/last mile solutions, which would include park and ride provision. <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> outlines our commitment to the introduction of additional Metrolink stops and additional Travel Hubs/Park and Ride facilities where appropriate. Support for the proposed Cop Lane Metrolink stop and suggestion for a stop at Dunwood Park are noted.	Howard Sykes

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C3.17	Focus on connecting our towns through orbital connections	The policy JP-C 3 includes supporting enhanced connections between town centres. <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> outlines our commitment to the introduction of an ambitious programme of Quality Bus Transit corridors focusing on key orbital corridors across GM linking town centres and other areas of high trip generation. Quality Bus Transit corridors are whole-route upgrades of key bus corridors, with a strong focus on quality and reliability. We are also exploring options for new bus rapid transit links, further Metrolink expansion and the potential for tram/train development that would serve orbital movements.	Redleaf VI (Ashton) Limited Partnership and Ellandi
	<b>Highways infrastructure</b>		
C3.18	Public Transport is unreliable due to road congestion.	Policy JP-C 3 supports measures to improve routes, services and upgrades to the public transport network. Paragraph 10.38 notes delivering whole route upgrades including improvements to journey times and reliability. <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> reflects the vital role that effective operation of highways network play within wider transport network and our recently published sub-strategy “ <a href="#">Streets for All Strategy</a> ” sets out how we intend to ensure that the competing needs of different road users (e.g. public transport and car drivers) are balanced in a way that supports sustainable growth. An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> .	E Bowles
C3.19	Motorway capacity is constrained by congestion resulting in unacceptable journey times and additional traffic on local roads.	The supporting text to Policy JP-C 4 (paras 10.54-10.55) and the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> recognise the vital role that the Strategic Road Network (SRN) plays within wider transport network, and the GMCA/TfGM work collaboratively with National Highways to ensure the effective operation of the SRN.  The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> analyse the impact of each allocation on the Strategic Road Network key junctions and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance.	Howard Sykes
C3.20	An increase in public transport provision will increase the amount of traffic jams	<b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> reflects the vital role that effective operation of the highways network plays within wider transport network and our recently published sub-strategy “ <b>Streets for All Strategy</b> ” sets out how we intend to ensure that the competing needs of different road users are balanced in a way that supports sustainable growth. An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> .	Peter Christie

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C3.21	Laissez-faire approach, arguing only once the roads become more constrained that people will change their habits.	Our approach, set out in Policy JP-Strat 14 and JP-C1 to JP-C7 and the <b>GM Transport Strategy 2040</b> <a href="#">[09.01.01]</a> , is to pro-actively improve public transport and active travel alternatives, to change travel behaviour, and make the best use of our limited road space.	Matthew Chandler
C3.22	New roads and bypasses are needed to improve public transport and make it viable.	A small number of new sections of highway are included within the PfE plan to open up allocation sites and help deliver development – in each case, these new links will help improve public transport by supporting access to stations, creating new routes for bus services, or by enabling road space reallocation for walking, cycling and public transport uses.  The <b>Allocation Policies</b> and associated <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> include details of where new links are proposed alongside improvements for public transport for each allocation.	Stephen Woolley
	<b>Climate change</b>		
C3.23	Due to the importance of the climate emergency, the public transport policy needs greater prominence. Rural areas are not considered to be well connected and greater focus on improving integration of rural areas is needed.	We agree that the public transport policy is very important to tackling the climate emergency. It should be noted that the plan should be read as a whole, and all policies are considered to have equal prominence so no changes are considered necessary.  The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our ambitions to improve the transport network including our approach to improving access in rural areas. The strategy recognises that people living in rural areas experience specific transport problems. Whilst it is considered that greater reference to transport in rural areas could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	Friends of Carrington Moss
	<b>High Speed 2</b>		
C3.24	HS2 and Northern Powerhouse Rail need to be explicitly mentioned. HS2 should be represented visually on all relevant maps within the plan.	HS2 and Northern Powerhouse Rail are described in the supporting text for Policy JP-C 3 and referenced within the policy. HS2 is also clearly shown in the supporting document <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> Map 3.  Whilst it is considered that this proposed wording/image changes could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	Redcliff Estates Highgrove Strategic Land Ltd Rowland Homes Ltd Peter and Diane Martin Boys & Girls Club of GM PD Northern Steels

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
			High Speed Two
C3.25	Concern for support set out for HS2 due to the impact on biodiversity. No objection in principle to Northern Powerhouse Rail, however this must be designed to comply with the biodiversity harm avoidance, minimisation and mitigation hierarchy, and to achieve a genuine measurable net biodiversity gain in line with national policy.	<p>HS2 and Northern Powerhouse Rail are both central government proposal supported by Greater Manchester to improve public transport between Greater Manchester and other cities, and to help reduce long-distance car use.</p> <p>The government have published a sustainability policy for HS2 which includes being an exemplar project in their approach to engagement with communities, sustainability and respecting the environment. For more details visit the government HS2 website <a href="#">[HS2 Sustainability Policy]</a>.</p>	The Wildlife Trusts
C3.26	<p>HS2 &amp; NPR, Airport expansion and motorway improvements which are all aimed at attracting global employers</p> <p>will allow such employers to require / force their staff to travel long distances to their jobs.</p>	The Policy JP-J1 recognises that Manchester Airport is the country's largest and best-connected airport outside London and the South East and seeks to make the most of the airport as major asset to the sub-region. <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> highlights a number of interventions which will help deliver improved sustainable transport options at the Airport and other employment sites, including Metrolink and Bus Rapid Transport proposals.	Peter Thompson
C3.27	HS2 Station Location is too separated from the Airport. Will the highway improvements be enough to support the amount of new development proposed?	<p><b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> highlights a key proposal to create a fast connection between the HS2 Station and the Airport through an extension of the Metrolink.</p> <p>The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> analyse the impact of each allocation on the Strategic Road Network key junctions and local road network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. Nevertheless, we recognise the need to continue the collaborative work currently underway with National Highways, HS2 and Manchester Airport Group on the long-term implications of growth around the Airport.</p>	Martin Arthur
C3.28	Given the proximity of the proposed new HS2 station at Manchester Airport to the M56 corridor, significant traffic impacts are anticipated, both during construction and operational phases, on the SRN in this location. The ongoing development of these proposals is therefore of high importance to National Highways as a key stakeholder.	<p>The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan <a href="#">[01.01.01]</a>.</p> <p>We recognise the need to continue the collaborative work currently underway with National Highways, HS2 and Manchester Airport Group on the long-term implications of growth around the Airport.</p>	National Highways

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>COVID19</b>		
C3.29	The implications of COVID have not been fully considered. There may not be a need for “huge new transport infrastructures” and the change in role for the centres which will adversely affect traditional patronage should be recognised.	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 <a href="#">[05.01.03]</a> . Nevertheless, an adaptive planning approach and regular refresh of our strategic ambitions aim to allow flexibility in our approach while keeping in mind our long-term vision for the Right Mix as set out in the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> . It should also be noted that <b>Our Five Year Transport Delivery Plan</b> <a href="#">[09.01.02]</a> will be updated, at least every five years, to ensure that we remain responsive to changes in travel trends and behaviour throughout the PfE plan period.	Peter Thompson Martin Arthur
C3.30	COVID19 Reduction of service and increase in car lead recovery – welcome intention to provide a reliable and responsive public transport system to replace car dependence.	Support noted.	Martin Arthur
C3.31	Endorsement of the ‘comprehensive multi-modal strategy’. Questions of whether this can be achieved due to shortage of resource, because of COVID.	Greater Manchester has a good track record of delivery. Our successful City Regional Sustainable Transport Settlement means that Government Funding of over £1bn funding package will available over the next five years to help develop and deliver our GM priorities as set out in <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>	Martin Arthur
	<b>Viability of non-allocated sites</b>		
C3.32	Viability assessment of non-allocated sites must be undertaken to inform the level of contributions to improvements in transport infrastructure and public transport services.	Modifications are not considered necessary. A strategic viability assessment <a href="#">[03.01.01]</a> , has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Planning applications for development of non-allocated sites will need to be accompanied with a Transport Assessment which examines the improvements to transport infrastructure and transport services, as a basis for contributions necessary to bring forward the site. In addition, depending on the location of the site contributions towards interventions set out in the <b>Our Five Year Transport Delivery Plan</b> <a href="#">[09.01.02]</a> may be appropriate.	Peel L&P Investments (North) Ltd

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Plan Delivery</b>		
C3.33	Further clarity required on contributions in relation to fair funding required to ensure this will be spread fairly across landowners and development remains viable.	No modifications are considered necessary. A strategic viability assessment, <a href="#">[03.01.01]</a> has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	Royal London Asset Management RLAM
C3.34	The GMCA set out their engagement plan for the next iteration of the document in a letter to the Secretary of State (Robert Jenrick) on 23rd August 2019 (attached as evidence). It is notable that the workshops with green belt groups (mentioned on pages 3, 5 and 6), particularly around transport and infrastructure issues, did not take place.	The letter referred to dates back to 2019. It followed the 2019 consultation and when the GMCA and the ten GMSF districts had hoped that the Plan would be produced as a Spatial Development Strategy (SDS), which would have been outside the remit of the districts' Statements of Community Involvement (SCI). The letter was therefore intended to give a flavour of the types of engagement that the GMCA and the districts could do in the event that the Plan was prepared as an SDS, in order to give comfort to the Minister that the districts were committed to doing more engagement than the minimum required by the SDS regulations. However, as the PfE was produced as a joint development plan, the consultation and engagement was guided by the districts' SCIs.	Friends of Carrington Moss
C3.35	The proposed rail link at Skelmersdale should be acknowledged within the plan due to the greater transport benefits between GM (Wigan) and Skelmersdale Support for the delivery of rail improvements in adjacent districts.	Support for Wigan-Skelmersdale rail link is reflected within in Map 3 of <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> . 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.	West Lancashire Borough Council
C3.36	It is unclear how tram/train and heritage operations will be feasible on the East Lancashire Railway line due to their engineering and operational incompatibility.	A significant amount of technical research is currently underway investigating Tram-Train technologies, alongside operational and engineering solutions, this is highlighted in <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> .	Martin Arthur
	<b>Duty to Cooperate</b>		
C3.37	Ensure local authorities close to GM are consulted closely to ensure a comprehensive and joined up approach to delivery.	Comment noted. The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan <a href="#">[01.01.01]</a> . The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> and <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> were also developed in conjunction with a range of wider stakeholders, including local authorities neighbouring Greater Manchester. We recognise the need for on-going collaborative working and consultation.	St. Helens Council

Row	Summary of main issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C3.38	Concern about the transport implications of Stockport's exclusion from the strategy.	<p>Comment noted. The PfE Plan is supported by a Duty to Co-operate Statement which details the collaboration that has been undertaken and which has informed the preparation of the Plan <a href="#">[01.01.01]</a>.</p> <p>See also our commitment for cross-boundary working in <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>. A series of addendums have been prepared to update the transport analysis contained in the <b>Locality Assessments</b> <a href="#">[09.01.17 through to 09.01.28]</a> and the <b>Strategic Modelling Technical Note</b> <a href="#">[09.01.04]</a> was updated to reflect Stockport's withdrawal from the original plan.</p>	Martin Arthur

## PfE 2021 Policy JP-C 4 – Streets for All

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Policy support</b>		
C4.1	Supportive of requirement for streets to be designed to make a positive contribution to quality of place, whilst lessening reliance of private vehicles for short and medium journeys and enhancing green infrastructure and improvements to local realm.	Support noted.	Royal London Asset Management RLAM Highgrove Strategic Land Ltd Peter and Diane Martin Boys & Girls Club of GM The Wildlife Trusts
C4.2	Request reference be made to street greening as a means for encouraging more walking and cycling.	Policy JP-C4 includes reference to creating a welcoming and attractive environment to encourage active travel on streets, as well as increased levels of greenery where possible. Policy JP-C 5 on Walking and Cycling also includes reference to utilising and enhancing green infrastructure to create opportunities for walking and cycling. Modification of the policy is therefore not considered necessary.	City of Trees
	<b>Development location</b>		
C4.3	Concern about the specific impacts of the Walshaw allocation. Nearby junctions are considered insufficient and unsafe, while surrounding highways have issues of speeding and congestion. Furthermore there is insufficient access to strategic transport networks or employment opportunities. The infrastructure proposed for the location is not sufficient to address the proposal.	Policy JP Allocation 9 includes measures to deliver public transport accessibility, sustainable transport infrastructure, and mitigate other highways impacts. Further detail is provided in JPA9 Walshaw Site Allocation Topic Paper <a href="#">[10.03.45]</a> .  <b>The Transport Locality Assessments – Bury – Greater Manchester Spatial Framework 2020</b> <a href="#">[09.01.09]</a> analyses the impact of the Walshaw allocation on the local transport network and concludes that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. The Locality Assessment also identifies public transport improvements that are necessary or would support the allocation in order to promote sustainable transport to minimise highway growth impacts.  No changes to the policy are considered necessary.	Christopher Russell
C4.4	Current PfE policy of delivering more homes will force people to drive.	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 (JP-S1). The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits	Colin Walters

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		<p>from access to public transport) as set out in the <b>Existing Land Supply and Transport Technical Note [09.01.05]</b> and associated addendum <a href="#">[09.01.06]</a>.</p> <p>The <b>Site Selection Background Paper [03.04.01]</b> outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in <b>Appendix 6 Site suitability methodology [03.04.08]</b>.</p> <p>The <b>Transport Locality Assessments [09.01.07 through to 09.01.29]</b> analyse the impact of each allocation on the local transport network and have concluded that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. Modification of the policy is not considered necessary.</p>	
	<b>Highways and Road Safety</b>		
C4.5	Cycling is not safe. Roads and pavements are not sufficient for safe active travel.	Policies within the PfE Plan JP-C4 and JP-C5, alongside the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> address highway safety, a known barrier to active travel. Policy JP-C1 also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network. A range of interventions, consistent with these policies are proposed within <b>Our Five Year Transport Delivery Plan [09.01.02]</b> which will deliver improvements to safety. No change to policy is considered necessary.	E Bowles Alison Doherty
C4.6	Greater consideration of safety needs to be given regarding use of powered two-wheelers and use on highways and footways, although supportive in principle of its inclusion within the road user hierarchy.	Support noted. Greater Manchester has hosted E-scooter rental trials in Rochdale and Salford as part of a series of national trials to investigate their potential future use, and results of the national trials will inform national and local policy on this innovative form of mobility. National policy is, however, clear that powered 2 wheelers such as E-scooters are only permitted through permitted rental schemes within trial areas, exclusively off the footway. Policy JPC-4 references the need to maximise the ability of people to be able to walk or cycle in safety. No change to policy is considered necessary.	Highgrove Strategic Land Ltd Murphy Group PD Northern Steels
C4.7	Concern the plan will lead to more accidents on highways due to a lack of any infrastructure mitigation, with the number of highway collisions already unacceptable.	Policy JP-C 1 supports transforming transport infrastructure and services to meet customers' needs by being safe and secure. The policy also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network. Policies within the PfE Plan, JP-C4 and JP-C5, alongside <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> address highway safety.  "Safe and Secure" is a guiding network principle of the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> , and the recently published <a href="#">Streets for All sub-strategy</a> . A range of interventions, consistent with these policies to address issues of street safety, are proposed, or being delivered, through <b>Our Five Year Transport Delivery Plan [09.01.02]</b> . The <b>Transport Locality Assessments [09.01.07 through to</b>	Julie Halliwell Maureen Buttle

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		<a href="#">09.01.29</a> have considered any safety implications of the individual allocations and have included potential interventions to mitigate the impact of the site where necessary.	
C4.8	Street safety concerns, including the presence of social no-go areas, and concern of street safety for women.	<p>Policy JP-C 1 supports transforming transport infrastructure and services to meet customers' needs by being safe and secure. The policy also incorporates a Road User Hierarchy that places pedestrians and cyclists as the highest priority users of the transport network. Policies within the PfE Plan JP-C4 and JP-C5, alongside <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> address highway safety.</p> <p>"Safe and Secure" is a guiding network principle of the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>, and the recently published <a href="#">Streets for All sub-strategy</a>. Interventions, consistent with these policies to address issues of street safety, are proposed, or being delivered, within <b>Our Five Year Transport Delivery Plan</b> <a href="#">[09.01.02]</a>.</p>	<p>Kim Scragg</p> <p>Maureen Buttle</p> <p>Edward Beckmann</p>
C4.9	Maintenance of roads is unacceptable at present. Roads are in a poor state of repair and presentation.	<p>Comment noted. Maintenance of existing infrastructure is outside of the scope of this plan. Local authorities have a statutory duty to maintain their highways, with TfGM coordinating strategic asset management of the Key Route Network through a KRN Asset Management Strategy developed in collaboration with the nine local Highway Authorities. A five-year maintenance investment programme to 2022/23 has been developed for the main assets on the Key Route Network.</p> <p>"Well-maintained" is a network-wide principle guiding investment in GM's transport network within the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>. <b>Our Five Year Transport Delivery Plan</b> <a href="#">[09.01.02]</a> sets out further detail on maintenance and asset management of a range of GM transport assets including highways and our CRSTS submission includes a Highway Maintenance Programme (Appendix 09).</p> <p>Whilst it is considered that greater reference to maintenance issues within the Connected Places chapter could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.</p>	<p>Kim Scragg</p> <p>Christopher Russell</p> <p>The British Horse Society</p>
C4.10	More consideration needed to be given to rural roads in Trafford to traffic flows and safety.	<p>Policies within the PfE Plan JP-C4 and JP-C5, alongside <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> address highway safety. The 'Streets for All' approach seeks to understand the movement and place function of streets, including rural roads, as the starting point for improvement. A range of interventions are proposed within <b>Our Five Year Transport Delivery Plan</b> <a href="#">[09.01.02]</a> which will deliver improvements to safety.</p>	Edward Beckmann
	<b>Accessibility</b>		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C4.11	Some people with reduced mobility have to rely on private cars.	Policy JP-C4 recognises the needs of those with reduced mobility and presents an opportunity to provide far greater choice for those currently with restricted travel options. Modification of the policy is therefore not considered necessary. The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> , and subsequently released <a href="#">Streets for All sub-strategy</a> also recognise these needs. Subsequent sub-strategy development has been clear to enshrine access for those still reliant on private vehicles, for example the <a href="#">City Centre Transport Strategy</a> .	Ellen McInnes
C4.12	Road closures can be subject to local opposition and difficult choices need to be made.	Response noted. Individual highway changes would be subject to their own local consultation processes before any scheme implementation. Modification of the policy is therefore not considered necessary.	Martin Arthur
	<b>Pollution</b>		
C4.13	No consideration of air quality or noise pollution. New development will cause additional traffic and associated air pollution, with risks to human health.	A number of policies in the PfE Plan provide a sufficient policy framework to address these issues. Air Quality and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 provide a sufficient policy framework to encourage mode shift and address carbon emissions from transport. Policies JP-P1, JP-P5 and JP-P6 ensure new development includes local infrastructure such as green spaces, schools and medical facilities, where appropriate, to reduce the need to travel longer distances by car. The Plan should be read as a whole, therefore no change is considered necessary.	Matthew Chandler Alison Doherty Stephen Cluer Steven Brown Tina Brown
C4.14	Concern over the number of developments on Greenfield sites, and their local impacts upon factors such as car use, emissions, human health and capacity of local infrastructure.	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 (JP-S1). 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 <b>Employment Topic Paper</b> <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the <b>Housing Topic Paper</b> <a href="#">[06.01.03]</a> . Further details in relation to the strategic case for releasing Green Belt can be found in the <b>Green Belt Topic Paper</b> <a href="#">[07.01.25]</a> .  A number of policies in the PfE Plan provide a sufficient policy framework to address these impact concerns. Air Quality and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 also provide a sufficient policy framework to encourage mode shift and address carbon emissions from transport. Policies JP-P1, JP-P5 and JP-P6 ensure new development includes local infrastructure such as green spaces, schools and medical facilities, where appropriate, to reduce the need to travel longer distances by car. The Plan should be read as a whole, therefore no change is considered necessary.	Stephen Cluer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		<p>The PfE Site Allocation Process <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations <b>Appendix 6 Site suitability methodology</b> <a href="#">[03.04.08]</a>.</p> <p>Allocations are assessed on their unique and cumulative impacts through their respective <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.29]</a> and the <b>Transport Strategic Modelling Technical Note – Places for Everyone 2021</b> <a href="#">[09.01.04]</a>.</p>	
	<b>Lack of adequate planning</b>		
C4.15	No forward planning of transport infrastructure prior to building means this is unrealistic	<p>The Local Authorities and TfGM have a clear policy direction (JP-Strat 14) 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.</p> <p>Policy JP-C 1 supports transforming transport infrastructure and services in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity. The phasing of all new infrastructure will be planned to be delivered as early as possible relative to new developments. In relation to the allocations, indicative phasing is set out in the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.29]</a>. The aim is to provide an integrated approach to transport and land use planning by identifying the strategic transport interventions required to deliver the scale of growth envisaged across Greater Manchester.</p>	Helen Lomax
C4.16	Laissez-faire approach, arguing only once the roads become more constrained that people will change their habits.	<p>Our approach, set out in Policy JP-Strat 14 and JP-C1 to JP-C7 and the <b>GM Transport Strategy 2040</b> <a href="#">[09.01.01]</a>, is to pro-actively improve public transport and active travel alternatives, to change travel behaviour, and make the best use of our limited road space.</p>	Matthew Chandler
C4.17	The majority of housing for Bury is in the Elton Reservoir site while locating the jobs on the M66 Northern Gateway corridor the other side of an already congested Radcliffe/Whitefield town centre. The proposed new link road will not help this problem as it links one congested area to another	<p>Policy JP Allocation 7 includes measures to deliver public transport accessibility, sustainable transport infrastructure, and mitigate other highways impacts. Further detail is provided in JPA7 Elton Reservoir Site Allocation Topic Paper <a href="#">[10.03.43]</a>.</p> <p>The <b>Transport Locality Assessments – Bury – Greater Manchester Spatial Framework 2020</b> <a href="#">[09.01.09]</a> analyses the impact of Elton Reservoir on the local transport network and concludes that the potential impacts of development on the transport network can be addressed and are not considered to be unsafe or severe, in accordance with NPPF guidance. The Locality Assessment also identifies public</p>	June Clough

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		transport improvements that are necessary or would support the allocation in order to promote sustainable transport to minimise highway growth impacts. No changes to the policy are considered necessary.	
C4.18	The plan could have been implemented years ago. A lot of words which may, or may not, be beneficial in the long run.	Response noted. Modification of the policy is not considered necessary.	Jeremy Williams
	<b>Behaviour Change</b>		
C4.19	Include emphasis how residents will be persuaded to change their mode of transport.	<p>The Streets for All policy JP-C4 presents a series of solutions that help encourage sustainable travel. Aligned with other PfE Connected Places policies JP-C3 to JP-C7 it creates a strong policy framework that supports the transformation of travel patterns across the plan area.</p> <p>The policy justification within the PfE Plan for the <a href="#">Connected Places chapter</a> [10.27] refers to the need for targeted travel behaviour change activities. This reflects the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> which includes maintaining a programme of interventions which are to be supported by encouraging sustainable travel behaviour change. Modification of the policy is therefore not considered necessary.</p>	Friends of Carrington Moss
	<b>Plan delivery</b>		
C4.20	How will Streets for All be achieved?	Policy JP-C4 sets the policy framework for delivery alongside policies within the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> and recently published <a href="#">Streets for All sub-strategy</a> . A number of interventions, consistent with these policies are proposed, or under delivery, within <b>Our Five Year Transport Delivery Plan [09.01.02]</b> . Our CRSTS submission includes a Streets for All Programme (Appendix 08) allocating funding to a number of Streets for All interventions and Streets for All principles will also be embedded in our Quality Bus Transit and Bus Corridor Upgrade packages proposed within our CRSTS Bus Programme (Appendix 01).	Ann Guilfoyle
C4.21	Further detail requested on the application of Streets for All policy through Local Plans or development management processes, and how it will be addressed.	Policies within the <b>Greater Manchester Transport Strategy 2040 [09.01.01]</b> and subsequently released <a href="#">Streets for All sub-strategy</a> provide further detail regarding application of the Streets for All approach. Each PfE local authority has adopted the strategy and will set out their own development management processes to deliver the strategy. 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	Rowland Homes Ltd Highgrove Strategic Land Ltd PD Northern Steels Peter and Diane Martin

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		detailed policies for specific areas, neighbourhoods or types of development'. Modification of the policy is therefore not considered necessary.	Boys and Girls Club of Greater Manchester
	<b>Congestion charge</b>		
C4.22	Concerns that the policy is a congestion charging proposal.	The policy presents no charging proposals to address congestion. Modification of the policy is not considered necessary.	Colin Walters

## PfE 2021 Policy JP-C5 – Walking and Cycling

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	<b>Policy Support</b>		
C5.1	<p>Support the requirements to lessen reliance on private car for short to medium distances to promote better wellbeing. Highlights requirements to use canals, parks, and recreation grounds to encourage cycling and walking.</p> <p>The removal of access barriers that discourage legitimate users is very welcomed and should give local authority partners the support to develop their barrier removal programme.</p>	Support noted	<p>Julie Riley</p> <p>Royal London Asset Management RLAM</p> <p>Ann Guilfoyle</p> <p>Friends of the Earth</p> <p>Trans Pennine Trail</p>
	<b>Location of new development</b>		
C5.2	<p>Building on greenfield land will impact on existing well used paths that are proposed for development, as well as decreasing active travel as people will be forced to use cars for all journeys to access PT and employment sites. This will also increase air pollution in these areas and discourage people from enjoying active healthy lifestyles.</p>	<p>A number of policies in the Connected Places chapter of the PfE Plan provide a sufficient policy framework to address these issues. Policy JP-C5 supports ensuring 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 in accordance with JP-C7.</p> <p>Policy JP-C7 requires all new development to prioritise safe and convenient access to the site and buildings for all users in accordance with the user hierarchy set out in Policy JP-C1. This will include providing new and enhanced walking, cycling routes through and around the site and improve the coverage, quality, and integration of the wider walking, cycling network. No modifications are considered necessary.</p>	<p>Gillian Boyle</p> <p>Stephen Cluer</p> <p>Christopher Russell</p>
	<b>Traffic congestion, pollution and road safety</b>		
C5.3	<p>Some roads designated as cycle routes would also inevitably become main link roads between new housing developments, increasing dangers for road users</p>	<p>A number of policies in the Plan provide a sufficient policy framework to address highway safety issues. Policy JP-C5 alongside Policy JP-C4 address highway safety, a known barrier to active travel by supporting the creation of safe, attractive and integrated walking and cycling infrastructure, and supporting the creation of, where needed, dedicated separate space for people walking and cycling, with pedestrians and cyclists given priority at junctions and crossings which form part of the Bee Network. Policy JP-C1 sets out the</p>	<p>Julie Halliwell</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		<p>Global Street Design Guide hierarchy giving the highest priority to the most vulnerable road users such as pedestrians and cyclists.</p> <p><b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> reflects the vital role that effective operation of highways network play within wider transport network and our recently published sub-strategy “<a href="#">Streets for All Strategy</a>” sets out how we intend to ensure that the competing needs of different road users (e.g. public transport and car drivers) are balanced in a way that supports sustainable growth. An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a>. The <a href="#">Interim Active Travel Design Guide</a> provides detailed guidance to GM authorities regarding best practice standards to meet when designing cycling infrastructure, including the balance of protection required for active travel users for different levels of general traffic to minimise potential conflict. No modifications to the policy are therefore considered necessary.</p>	
C5.4	Questions around the increase of light pollution in rural areas.	<p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> recognises the potential negative impact of light pollution on the environment. Policy 12 of the GMTS states that: “We will minimise the impact of transport on the built and natural environment - including townscape, the historic environment, cultural heritage, landscape, habitats and biodiversity, geodiversity, water quality, pollution, flood risk and use of resource - and will deliver environmental enhancements and biodiversity net gain where possible.”</p> <p>Whilst it is considered that specific reference to light pollution within the PfE Plan could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.</p>	Sheila Tod
	<b>Cycling - Quality, safety and maintenance</b>		
C5.5	Cyclists are a hazard to pedestrians especially those with prams, young children, dogs and/or mobility issues.	<p>No modifications to the policy are considered necessary. Our recently published sub-strategy “<a href="#">Streets for All Strategy</a>” sets out how we intend to ensure that the competing needs of different road users (e.g. pedestrians and cyclists) are balanced in a way that supports sustainable growth. An introduction to Streets for All approach is set out in the <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a>.</p>	Anne Isherwood
C5.6	There are cycle routes in Greater Manchester that are deemed unsafe due to real and perceived threat of crime, such as Fallowfield Loop Investment in more walking and cycling.	<p>No modifications to the policy are considered necessary. Policy JP-C5 supports the creation of safe, attractive, and integrated walking and cycling infrastructure to help deliver a higher proportion of journeys made by walking and cycling.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> outlines how we will continue to work with partners to improve safety and tackle crime and anti-social behaviour across the network.</p>	CPRE

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
C5.7	Cycling infrastructure needs to be high quality and continuous. It should also meet the LTN 1/20 and bridleway standards where applicable. Potholes, blocked drains, high pollution levels and congestion make cycling unsafe.	<p>Policy JP-C5 sets out support for a range of measures to improve the quality and continuous coverage of a cycle infrastructure network across the whole of the plan area using national and locally adopted design guidance. The Greater Manchester Cycling and Walking Infrastructure Proposal (Bee Network) is a vision for Greater Manchester to become the first city-region in the UK to have a fully joined up walking and cycling network. The Greater Manchester's Cycling and Walking Investment Plan (Change a Region to Change a Nation) sets out our ambition to connect every neighbourhood and community in Greater Manchester, covering over 1,800 miles of route. The network will have a single identity across Greater Manchester, using the symbol of the worker bee, which will represent a promise of route quality: that all such routes will be easily useable by a competent 12-year-old on a bike, or by a parent pushing a double buggy.</p> <p>The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> outlines our ambition to enable people to move seamlessly across a high quality, easy-to-use network. Our ambition is to bring the transport network into a good state of repair, and maintain it, to ensure that it can withstand unexpected events, exceptional demand, and severe weather. The <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> outlines the work underway to enhance the GM Cycling and Walking Network.</p>	Louise Bolotin E Bowles Christopher Russell Trans Pennine Trail Sheila Tod
C5.8	Cycling infrastructure removed for other public transport modes. There used to be cycle lanes in Trafford, but they disappeared.	Policy JP-C5 supports a range of measures to improve not only the quality but also the capacity and continuous coverage of a cycle infrastructure network across the whole of the plan area. The Greater Manchester's Cycling and Walking Investment Plan (Change a Region to Change a Nation) sets out our ambition to connect every neighbourhood and community in Greater Manchester, covering over 1,800 miles of route. As we continue to develop the GM Cycling and Walking Network, pre-existing low quality cycle infrastructure may need to be replaced. Local authorities will develop and deliver new schemes via the Mayor's Challenge Fund for Cycling and Walking. At present there is £160m in the fund available over the next four years to roll out a programme of high quality, well maintained, attractive and well publicised cycle and walking routes. No modifications to the policy are therefore considered necessary.	Peter Christie
C5.9	Sounds like a good idea (walking and cycling) but who is going to maintain the network?	Maintenance is outside the scope of this plan, however the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> outlines our ambition is to bring the transport network into a good state of repair, and maintain it, to ensure that it can withstand unexpected events, exceptional demand, and severe weather. Local transport authorities also have the responsibility for maintenance for the local highway network.	Kate Tod Sheila Tod
C5.10	Cycling infrastructure and parking must be designed to be inclusive and accommodate non-	Policy JP-C5 supports the creation of safe, attractive and integrated walking and cycling infrastructure, connecting every neighbourhood and community using national and locally adopted design guidance.	Trans Pennine Trail

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
	standard cycles such as trikes, cargo bikes and tandems.	The <b>Transport Topic Paper</b> [09.01.29] references the <a href="#">Interim Active Travel Design Guide</a> which provides detailed guidance that non-standard cycles will be given consideration when designing cycle infrastructure and cycle parking.	
C5.11	It would be very difficult to introduce cycle lanes on narrow roads.	Comment noted. The <b>Transport Topic Paper</b> [09.01.29] references the <a href="#">Interim Active Travel Design Guide</a> which provides detailed guidance on cycle lane design.	Alison Doherty
	<b>Disability access</b>		
C5.12	Disability Access is not addressed (in relation to Boothstown and A580).	<p>Policy JP-C1 includes within the Global Street Design Guide hierarchy, pedestrians and people using mobility aids as the highest priority. Policy JP-C7 prioritises the safe and convenient access to the site and buildings for <b>all users</b> in accordance with the user hierarchy in Policy JP-C1.</p> <p>Policy JP-C4 aims to ensure that the design and management of streets follow a “Streets for All” approach thereby ensuring that streets are welcoming for all and respond to the needs of those with reduced mobility. An introduction to the Streets for All approach is set out in the <b>Transport Topic Paper</b> [09.01.29]. In addition, the <b>Greater Manchester Transport Strategy 2040</b> [09.01.01] outlines how we will continue to deliver accessibility improvements to our existing transport networks, targeting those parts of our transport system which most require improvement and cause most disadvantage to those with a mobility impairment (p29). No modifications to the policy are therefore considered necessary.</p>	Matthew Chandler
	<b>Delivery of the policy</b>		
C5.13	The plans for improved public transport and the encouragement of walking and cycling, whilst admirable, are unrealistic aspirations.	Policies JP-C3, JP-C4 and JP-C5 in the PfE Plan provide a sufficient policy framework to support the delivery of GM’s realistic aspirations for the transport network. The overall framework for delivering proposed public transport and active travel improvements is contained in <b>Greater Manchester Transport Strategy 2040</b> [09.01.01] and <b>Our Five Year Transport Delivery Plan 2021-2026</b> [09.01.02]. Greater Manchester’s Walking and Cycling Investment Plan (Change a Region to Change a Nation) provides further detail on the walking and cycling interventions currently proposed. We believe that these reflect realistic aspirations for the transport network. No modifications to the policy are therefore considered necessary.	Colin Walters Christopher Russell
C5.14	Concern that the Bee Network will not receive the funding required for delivery.	Greater Manchester has recently been awarded a City Regional Sustainable Transport Settlement (CRSTS) which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. Development of the GM Bee Network is a key priority as set out in <b>Our Five-Year Transport Delivery Plan 2021-2026</b> [09.01.02]. It is anticipated that further multi-year	Friends of the Earth

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent Name(s)
		infrastructure funding settlements will be awarded in future years over the course of the PfE Plan period. No modifications to the policy are therefore considered necessary.	
C5.15	There are no measurable targets referred to in the chapter.	The monitoring framework in Chapter 12 of the PfE Plan provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.  The <b>Greater Manchester Transport Strategy 2040</b> [09.01.01] includes a number of Key Performance Indicators (p129-137) that enable us to measure the performance of the network and progress towards “desired outcomes” of the Transport Strategy and PfE Plan. No modifications to the policy are therefore considered necessary.	National Highways
C5.16	Suggested modification: withdrawal of any Allocation that is not aligned with this Policy.	All allocations are considered to adequately align with Policy JP-C5. No modifications are considered necessary.	Friends of Carrington Moss
C5.17	Policy JP-C 5 should be amended as follows to make the policy sound: Where there is inadequate walking and cycling provision, new developments should be planned and constructed with walking and cycling are supported and fully integrated into the existing walking and cycling infrastructure in accordance with JP-C7.	Policy JP-C7 covers the requirements for new developments specifically. Policy JP-C5 already supports ensuring 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 in accordance with JP-C7. No modifications are considered necessary to JP-C5.	Redrow Homes (Trafford)

## PfE 2021 Policy JP-C 6 – Freight and Logistics

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
	<b>Sustainable Freight</b>		
C6.1	Greater emphasis should be provided on use of rail and canals to carry freight, and less on locations that are highway exclusive. To be consistent with national policy on reducing carbon emissions, the plan should not just rely on Port Salford and Trafford Park. The plan should also seek to protect existing water and rail sites.	The plan policies include specific support to the modal shift of freight to more sustainable modes in Policy JP-C 6. The location of freight and logistics sites is driven by market demand and suitable sites located close to rail and water terminals are less common than those located close to the road network. The inclusion of allocations (such as Port Salford Extension) with potential highway logistics uses, is consistent with <a href="#">National Planning Policy Framework</a> (6.81), including the need to support economic growth and productivity taking into account local business needs and wider opportunities for development.	Martin Arthur Friends of the Earth
C6.2	Amend the Policy (paragraph 10.71) to state that, if logistics sites in the Plan area will be reliant on road-based freight, they should not be approved & amend point 1 in the Policy itself (page 212) the following wording 'Protecting and enhancing existing rail- and water-served sites and associated infrastructure',	The location of freight and logistics sites is driven by market demand and suitable sites located close to rail and water terminals are less common than those located close to the road network. The inclusion of allocations with potential highway logistics uses, is consistent with <a href="#">National Planning Policy Framework</a> (6.81), including the need to support economic growth and productivity taking into account local business needs and wider opportunities for development.  No modifications are considered necessary.	Friends of Carrington Moss
C6.3	Support modal shift of freight to water	Support noted, the plan policies include specific support to the modal shift of freight to sustainable modes including water-based freight in Policy JP-C 6, such as protecting water served sites, and the completion of plans for tri-modal Port Salford.	CPRE
C6.4	Existing railway needs invest in infrastructure and electrification	All strategically significant infrastructure investment proposals are highlighted in the supporting document <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> – this includes identifying where improvements such as infrastructure and electrification are needed in conjunction with Network Rail.	E Bowles
C6.5	Concern that recent highway infrastructure projects may reduce the ability to accommodate freight by water on the Manchester Ship Canal.	The development of Port Salford has included the delivery of a new road with a lifting bridge. This enables unconstrained ship movement beyond Port Salford and water access for freight through the entire length of the Manchester Ship Canal.	CPRE
C6.6	Incorporate an action in the Policy to encourage residents to seek other ways of receiving goods (rather than delivery to their doorstep)	The policy contains proposals to reduce the impact of last-mile freight deliveries through consolidation in JP-C 6 point 4. Detailed transport policy on supporting the more sustainable movement of goods is also in the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> including the development of mobility hubs, and	Friends of Carrington Moss

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
		lockers in key destinations to reduce doorstep deliveries. No modifications to the policy are therefore considered necessary.	
C6.7	Nothing is said about rail freight on the East Lancashire Rail line, given the line's proximity to the major employment sites proposed close by.	The supporting text of JP Allocation Policy 1.1 states that there is "an expectation that opportunities are fully explored to deliver a rail freight spur exploiting the existing heavy rail connections from the East Lancashire Railway line". The Plan should be read as a whole and therefore no modification of the policy is considered necessary.	Martin Arthur
	<b>Expansion of Air Freight</b>		
C6.8	Concern that the policy gives unconditional support for the growth of air freight at Manchester Airport. Change in clause 3 needed to make expansion of air freight activities subject to compliance with climate change and public health policies of the plan.	The Plan should be read as a whole, therefore planning applications for the expansion of freight activities at Manchester Airport will be subject to relevant national and local policy (including other policies in the PFE Plan) at the time of determination. No modifications considered necessary.  The impacts of additional flights are a matter for national and international policy – the UK Government published its green paper, "Aviation 2050 – the future of UK Aviation" in late 2018. The Government's response to the consultation on the green paper is awaited.	The Wildlife Trusts Friends of the Earth
C6.9	Amend the Policy to state that air freight activities will not be expanded at Manchester Airport until climate-friendly air fuel is available and in use.	Manchester Airport is working towards being carbon neutral in relation to ground transport emissions. Local Authorities, GMCA and TfGM will work with the airport and its customers, partners and stakeholders to reduce the environmental impact of its operations. No modifications considered necessary. The impacts of additional flights are a matter for national and international policy – the UK Government published its green paper, "Aviation 2050 – the future of UK Aviation" in late 2018. The Government's response to the consultation on the green paper is awaited.	Friends of Carrington Moss
	<b>Development Location</b>		
C6.10	The release of large areas of greenfield land for logistics would be car based and unsustainable. Consolidation and distribution sheds in this policy should not be used as a justification for substantial 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 (JP-S1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.02]</a> .  The existing land supply, including land still available at existing business parks, was taken into account in developing the employment land requirement over the plan period. The methodology used to identify the allocations is set out in <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> . Consolidation centres noted within the policy refer to opportunities to improve the sustainability of freight operation. The <b>Transport Locality</b>	Colin Walters Christopher Russell Maureen Buttle Stephen Cluer Friends of the Earth

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
		<b>Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> analyse the impact of each allocation on the local transport network and identify public transport improvements that are necessary, or would support, the allocation in order to promote sustainable development.	
C6.11	We do not see how GMCA can implement charging points and 'facilitate/accommodate' urban consolidation and distribution centres.	The <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our aspirations to work with the freight industry to introduce sustainable distribution where possible, including consolidation of freight movements in urban areas and for public sector organisations, and potentially using greener vehicles for 'last mile' delivery. TfGM are progressing a range of projects to trial the viability of consolidation centres and roll out charging points.	Martin Arthur
C6.12	The existing business parks still aren't full. You should be encouraging businesses to use these before providing new ones for companies to use.	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 (JP-S1). However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> . The existing land supply, including land still available at existing business parks, was taken into account in developing the employment land requirement over the plan period.  The methodology used to identify the allocations is set out in <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> . This approach is consistent with <a href="#">National Planning Policy Framework</a> (6.81), including the need to support economic growth and productivity taking into account local business needs and wider opportunities for development.	Stephen Cluer Friends of the Earth
	<b>Highways SRN</b>		
C6.13	The policy acknowledges that many logistics sites in Greater Manchester will take advantage of the strategic location within the national motorway network and therefore naturally will be reliant on road-based freight.	All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility and mitigate SRN highways impacts where appropriate. The impact of the allocations on the transport network is examined in the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> for each allocation and GMCA/TfGM are working alongside National Highways to further examine a "policy-off/worst-case" impact on the SRN to help address National Highways concerns.	National Highways
	<b>Economic Growth</b>		
C6.14	The policy does not go far enough to support economic growth or productivity objectives and	The individual allocations policies identify which sites are suitable strategic locations for logistics. No modifications are considered necessary.	Harworth Group

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
	should refer to development for storage and distribution specifically.		
	<b>National Policy</b>		
C6.15	Freight and logistics policy is inconsistent with national policy.	Without further detail it is not possible to further examine the respondent's concerns. However, the plan is considered to be consistent with <a href="#">NPPE</a> .	Martin Arthur
	<b>Intervention Feedback</b>		
C6.16	Bypass unrealistic	Specific highway interventions related to the allocations have been assessed as part of the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> and have been included in the viability assessments for each allocation to ensure deliverability.	Kim Scragg

## Policy JP-C 7 – Transport Requirements of New Development

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
	<b>Support for policy</b>		
C7.1	New developments to be designed to encourage walking cycling and the use of public transport through a variety of means.	Support noted.	Royal London Asset Management RLAM Russell LDP
	<b>Transport infrastructure, capacity and maintenance</b>		
C7.2	The projected growth of industrial warehousing, office space and new homes will require monumental investment in transport infrastructure.	<p>The Local Authorities and TfGM have a clear policy direction (JP-Strat 14) 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.</p> <p>Policy JP-C 1 supports transforming transport infrastructure and services in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity.</p> <p><b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> The programme of interventions set out in the Five Year Delivery Plan reflects the growth aspirations of the PfE Plan in order to support sustainable development. The allocation topic papers for each allocation set out the specific infrastructure requirements for that allocation.</p> <p>Greater Manchester has recently been awarded a <b>City Regional Sustainable Transport Settlement (CRSTS)</b> which means that Government funding of £1.07bn will be available over the next five years to help develop and deliver the programme of interventions. It is envisaged that further multi-year infrastructure funding settlements will be awarded in future years over the course of the PfE Plan period. No modifications to the policy are therefore considered necessary.</p>	Howard Sykes
C7.3	Investment in public transport in these areas will be extremely expensive and unlikely to mitigate these realistic concerns.	All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure, public transport accessibility, and mitigation of other highways impacts where appropriate. The impact of the allocations on the transport network is examined in the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> which concluded that the potential impacts of the allocations on the transport network can be mitigated and are not considered to be unsafe or severe, in accordance with NPPF.	Stephen Cluer

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
		The PfE <b>Strategic Viability Assessments</b> <a href="#">[03.01.01- 03.01.04]</a> demonstrate the viability of mitigation proposed.	
C7.4	Existing transport infrastructure is inadequate to support current population, increasing population levels in areas with already inadequate transport infrastructure will add to existing congestion issues.	<p>The Local Authorities and TfGM have a clear policy direction (JP-Strat 14) 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.</p> <p>Policy JP-C 1 supports transforming transport infrastructure and services in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity.</p> <p><b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>.</p> <p>The <b>allocations policies</b> and the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> set out the required transport infrastructure improvements for each allocation that are necessary for, or would support, the allocation in order to mitigate its impact on the network. No modification to the policy is proposed.</p>	Stephen Woolley Kim Scragg Christopher Russell Julie Halliwell
C7.5	Capacity of existing services is inadequate – developers should consider capacity of existing services.	<p>In accordance with NPPF, developers are required to mitigate the impacts of their development proposals and not pre-existing capacity constraints. However, our approach set out in Policy JP-Strat 14 and JP-C1 to JP-C7 to encourage increased use of public transport includes measures to relieve capacity constraints on the network where feasible. Policy JP-C 1 is supported by the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> which sets out our ambitions to improve the capacity and quality of the transport network across Greater Manchester. All strategically significant infrastructure investment proposals are highlighted in the supporting document <b>Our Five-Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a>.</p> <p>All <b>allocations policies</b> include measures to address capacity concerns by delivering sustainable transport infrastructure and improved public transport accessibility, and mitigating other highways impacts where appropriate.</p> <p>The consideration of capacity by developers is implicit in Policy JP-C7 which states that developers would be required to subsidise new, or amended, public transport services where the development would otherwise have inadequate public transport access. Whilst it is considered that amending the</p>	Ellen McInnes

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
		policy wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.	
C7.6	Better maintenance of existing infrastructure required	<p>Comment noted. Maintenance of existing infrastructure is outside of the scope of this plan. Local authorities have a statutory duty to maintain their highways, with TfGM coordinating strategic asset management of the Key Route Network through a KRN Asset Management Strategy developed in collaboration with the ten local Highway Authorities. A five year maintenance investment programme to 2022/23 has been developed for the main assets on the Key Route Network.</p> <p>A well-maintained transport network is a network-wide principle, guiding investment in GM's transport network within the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a>. <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> sets out further detail on maintenance and asset management of a range of GM transport assets and our CRSTS submission includes a Highway Maintenance Programme (Appendix 09).</p>	Maureen Buttle
C7.7	Public Transport unrealistic unless you have one single journey to make.	<p>The policies in the Plan provide a sufficient policy framework to support the creation of a better integrated transport network, with policies JP-C1, JP-C3, JP-C4 and JP-C7 ensuring an integrated network and that new developments are well integrated into the network. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>In addition, our ambition set out in the plan policies and the <b>GM Transport Strategy 2040</b> <a href="#">[09.01.01]</a> is to enable people to move seamlessly between transport services on a single, easy-to-use network. In order to ensure that new development is connected to this network Policy JP-C 7 requires new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p>	Helen Lomax
C7.8	Mottram Bypass may not go ahead so the Godley Green Garden Village should be revised or cancelled.	No change is considered necessary. JP-C7 is a strategic planning policy. Consistent with NPPF, it sets out an appropriate strategic policy framework for outlining the transport requirements of new development. The relevant allocation policies are supported by a proportionate evidence base, detailing the transport infrastructure required to support the development. Further details of which can be found in the <b>Godley Green Garden Village Topic Paper</b> <a href="#">[10.08.12]</a> .	Karen Shreeve
	<b>Phasing of infrastructure</b>		

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
C7.9	Transport infrastructure should be in place before development.	<p>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 NPPF and NPPG.</p> <p>Policy JP-D1 and JP-D2 are supported by <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> in terms of funding and delivering transport interventions.</p> <p>All <b>allocations policies</b> include measures to deliver sustainable transport infrastructure and public transport accessibility, and mitigate other highways impacts where appropriate. The <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> outline indicative phasing for all necessary transport infrastructure. The specific phasing of interventions will be determined through the normal planning process through the preparation of a Transport Assessment setting out infrastructure and phasing of delivery. Modification of the policy is not considered necessary.</p>	Howard Sykes
	<b>Environmental issues</b>		
C7.10	Where the transport implications of the Allocations require new major roads to be constructed, these will impact the health and wellbeing of local residents and wildlife. Such major affects should mean that the highest standards of consultation are implemented in advance of decisions being taken.	<p>A <b>Statement of Consultation</b> <a href="#">[03.05.01]</a> has been published alongside the PfE Plan which sets out how all consultation has been in conformity with each local authority's SCI.</p> <p>Consultation on planning applications will comply with the relevant local authority's SCI in force at the time. No change to the policy is considered necessary.</p>	Friends of Carrington Moss
C7.11	New development will result in increased car use and therefore impact on air quality and increase carbon emissions.	<p>A number of policies in the PfE Plan provide a sufficient policy framework to address these issues. Air Quality and carbon emissions from transport are considered in Policy JP-S6. Policies JP-C1 to C7 provide a robust policy framework to encourage mode shift and address carbon emissions from transport. Policies JP-P1, JP-P5 and JP-P6 ensure new development includes local infrastructure such as green spaces, schools and medical facilities, where appropriate, to reduce the need to travel longer distances by car. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>In addition the <b>Greater Manchester Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our ambitions to improve air quality and reduce carbon emissions from transport across Greater Manchester. The <b>Transport Topic Paper</b> <a href="#">[09.01.29]</a> summaries associated plans and strategies such as the 5-Year Environment Plan and the GM EVCI Strategy which set out further detail on reducing carbon emissions from transport and encouraging an accelerated transition to Electric Vehicles.</p>	Steven Brown Tina Brown Stephen Cluer

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
C7.12	"Point 14 of the policy references the need to ensure that Construction Management Plans are produced for developments, where appropriate, to mitigate the construction logistics impacts on the surrounding area. As with typical consultation on planning applications, National Highways would expect to be consulted on the routing effects of logistics vehicles during construction, and the location of site compounds in regard to accessing the SRN.	Comment noted. Consultation on planning applications will be compliant with the relevant local authority's SCI in force at the time. No modifications to the policy are therefore considered necessary.	National Highways
C7.13	New housing estates should only be granted planning permission if they are permeable to walkers and cyclists (even if they are cul-de-sacs to motorised traffic), so as to encourage active and low CO2 travel.	The policies in the Plan provide a sufficient policy framework to support and encourage active and sustainable travel, with policies JP-C5 and JP-C7, in particular, ensuring 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. No modifications to the policy are therefore considered necessary.	Ian Barker
	<b>Location of new development</b>		
C7.14	Proposed developments are not strategically located to local transport hubs and key routes, because they are positioned on Greenfield land, and therefore will increase car use and congestion on local roads and the key route network.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). 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 <b>Employment Topic Paper</b> <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the <b>Housing Topic Paper</b> <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the <b>Green Belt Topic Paper</b> <a href="#">[07.01.25]</a>.</p> <p>The majority of land identified for development in the PfE Plan is on land within the existing urban area (which generally already benefits from access to public transport) as set out in the <b>Existing Land Supply and Transport Technical Note</b> <a href="#">[09.01.05]</a> and associated addendum <a href="#">[09.01.06]</a>.</p> <p>The <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations in <b>Appendix 6 Site suitability methodology</b> <a href="#">[03.04.08]</a></p>	Stephen Cluer

Row	Summary of issues raised to PFE2021	Summary response to issues raised to PFE2021	Respondent Name(s)
		Policies JP-C1-C7 provide a robust policy framework to encourage mode shift to sustainable travel. Modification of the policy is not considered necessary.	
C7.15	Development should only be built on brownfield land which has good public transport accessibility and where empty or redundant building could be repurposed to help regenerate town centres with good public transport access and to reduce the need for development on Green Belt and OPOL.	<p>The PFE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF (JP-S1). 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 <b>Employment Topic Paper</b> <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the <b>Housing Topic Paper</b> <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the <b>Green Belt Topic Paper</b> <a href="#">[07.01.25]</a>.</p> <p>The majority of land identified for development in the PFE Plan is on land within the existing urban area (which generally already benefits from access to public transport) <b>Existing Land Supply and Transport Technical Note</b> <a href="#">[09.01.05]</a> and associated addendum <a href="#">[09.01.06]</a>.</p> <p>The PFE Site Allocation Process <b>Site Selection Background Paper</b> <a href="#">[03.04.01]</a> outlines the methodology used to identify allocations. Consideration of land within the existing urban area or with good public transport accessibility was a key factor for identification of allocations <b>Appendix 6 Site suitability methodology</b> <a href="#">[03.04.08]</a>. Modification of the policy is not considered necessary.</p>	Stephen Cluer Howard Sykes Christopher Russell
C7.16	Policy JP-C 7 focuses on the need for the use of sustainable travel modes to be encouraged at new developments, in order to minimise the effects of vehicle traffic. There is no specific reference to the connectivity and interaction with the SRN.	Policy JP-C 7 requires new development to “ensure appropriate connectivity to the existing highway network”. In this context, the “existing highway network” is considered to include the Strategic Road Network as well as the local road network. Specific reference to the SRN is not considered necessary.	National Highways
C7.17	Transport Assessment and Statement should be required by major development applications to manage transport in an integrated way and for monitoring purposes.	Policy JP-C7 states that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate. No change to the policy is considered necessary.	CPRE
C7.18	Local planning authorities must ensure that routes for buses and good access to stops are achieved in new development.	Policy JP-C 7 requires new development to be located and designed to enable and encourage walking, cycling and public transport use; by prioritising new and enhanced walking, cycling and public transport routes and stops, through and around the site and by subsidising new or amended public transport services where the development would otherwise have inadequate public transport access. No change to the policy is considered necessary.	Martin Arthur

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	<b>Site viability</b>		
C7.19	Suggested modification to the policy recommended that the policy wording should be amended to include “subject to site viability”.	The proposed modification is not considered necessary. Viability assessment work undertaken for the PfE Plan is set out in the <b>Places for Everyone Strategic Viability Assessments</b> <a href="#">[03.01.01-03.01.04]</a> which have been published alongside the PfE Plan. These have considered the implications of all policies at an individual allocation level and for the plan as a whole. Therefore, in line with NPPF it will be assumed that planning applications which comply with the adopted PfE Plan will be viable, however NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	GLP Trows LLP and BDW Trading Ltd  Redrow Homes (Trafford)
C7.20	Suggested modification to the policy recommended that the policy wording should be amended as follows: (1) amend the wording in the Policy to make it clearer that the requirement to ensure new developments are “planned and constructed with walking and cycling as the primary means of local access” (page 214) is not negotiable. (2) amend the wording in the Policy to stress that, if an area cannot be provided with good public transport (paragraph 10.76, page 213), that area will not be considered suitable for development.	Policy JP-C7 wording is considered to be sufficiently robust to promote sustainable development.  Modifications are not considered necessary.	Friends of Carrington Moss
	<b>Level of detail of the transport evidence</b>		
C7.21	In relation to to transport provision for specific allocations, it is impossible to determine current traffic figures, increases in traffic from proposed developments already approved and in the allocation.  The above should be provided (separating HGVs from cars, and residents from employees) in advance of any decision to release green belt land.	No change is considered necessary. Policy JP-C7 is considered to be consistent with NPPF and provides an appropriate strategy to ensure new development will enable sustainable travel and reduce the negative effects of car dependency which is a key objective of the plan and NPPF. A proportionate transport evidence base, using the best available data, has been provided to inform the plan policies.  Policy JP-C7 is a strategic planning policy which states that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate – the matters that would be included in a TA would be determined on a site-by-site basis and would reflect the pattern of traffic on the highways at the time of the planning application.	Friends of Carrington Moss

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C7.22	Suggested Modification: clear evidence that each District's Statement of Community Involvement and the Gunning Principles have been adhered to in considering transport issues.	Comment not relevant to the content of Policy JP-C7 Matter addressed elsewhere.	Friends of Carrington Moss
C7.23	The scale of such measures, extent to which new developments play a role in the delivery and level of contribution required alongside other policy objectives could have an adverse impact on the viability of schemes and consequently on the delivery of much needed housing. The additional infrastructure measures and requirements outlined within this policy have not been accounted for in the Three Dragon's generic cost assumptions or as part of the evidence based on site specific viability review nor have they taken into account consideration for the potential land take. Suggested modification to the policy recommended that the policy wording should be amended to remove Part (6), (under Public Transport), Part (7) (under Parking Infrastructure) and Part (13) (under Access and Servicing).	Viability assessment work undertaken for the PfE Plan is set out in the <b>Places for Everyone Strategic Viability Assessments</b> <a href="#">[03.01.01- 03.01.04]</a> . These have considered the implications of all policies at an individual allocation level and for the plan as a whole, therefore no modifications to the policy are considered necessary. NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.	Redrow Homes (Trafford)
	<b>Delivery</b>		
C7.24	An Infrastructure Delivery Plan should set out the proposed infrastructure improvements and test the deliverability and viability of such proposals.	<p>A number of policies in the PfE Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P5, JP-P6 and JP-D2 which state that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.</p> <p>For development of the allocations, the <b>Transport Locality Assessments</b> <a href="#">[09.01.07 through to 09.01.28]</a> set out the required transport infrastructure improvements for each allocation that are necessary, or would support, the allocation in order to mitigate the impact of development.</p> <p><b>Strategic Viability Assessments</b> <a href="#">[03.01.01 – 03.01.04]</a> have been published alongside the PfE Plan to demonstrate viability of mitigation for the allocations.</p> <p>In addition, the <b>GM Transport Strategy 2040</b> <a href="#">[09.01.01]</a> sets out our realistic ambitions to improve the transport network across Greater Manchester. All strategically significant infrastructure</p>	Peel L&P Investments (North) Ltd

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		investment proposals are highlighted in the supporting document <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> . TfGM is committed to maintaining an up to date Five Year Delivery Plan throughout the PfE Plan period. A separate Infrastructure Delivery Plan is not considered necessary.	
C7.25	Reliance on co-operation of property developers to deliver plans.	Policy JP-C 7 sets out the transport requirements of new development. Applications for planning permission will need to comply with the requirements of the policy. In addition a wide programme of public investment is set out within <b>Our Five Year Transport Delivery Plan 2021-2026</b> <a href="#">[09.01.02]</a> . No change to the policy is considered necessary.	Christopher Russell
C7.26	Contributions should mitigate against the impacts of new development.	Policy JP-C7 clearly states that new development should be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments. The requirements set out in the policy are to mitigate against the impacts of new development, therefore no change is considered necessary.	Russell LDP
	<b>Parking</b>		
C7.27	Ensuring new build houses actually fit a regular family car	Policy JP-C7 requires new development to comply with any parking standards set out in local plans. No modifications to the policy are considered necessary.	Ann Guilfoyle
C7.28	The policy should include GM parking standards for new residential and employment developments.	Policy JP-C 7 requires new development to comply with any parking standards set out in local plans. Car parking standards are set out in Local Plans to allow the flexibility for each Local Planning Authority to reflect the different requirements for car parking in different locations across the local authority area. No modifications to the policy are considered necessary.	Friends of the Earth