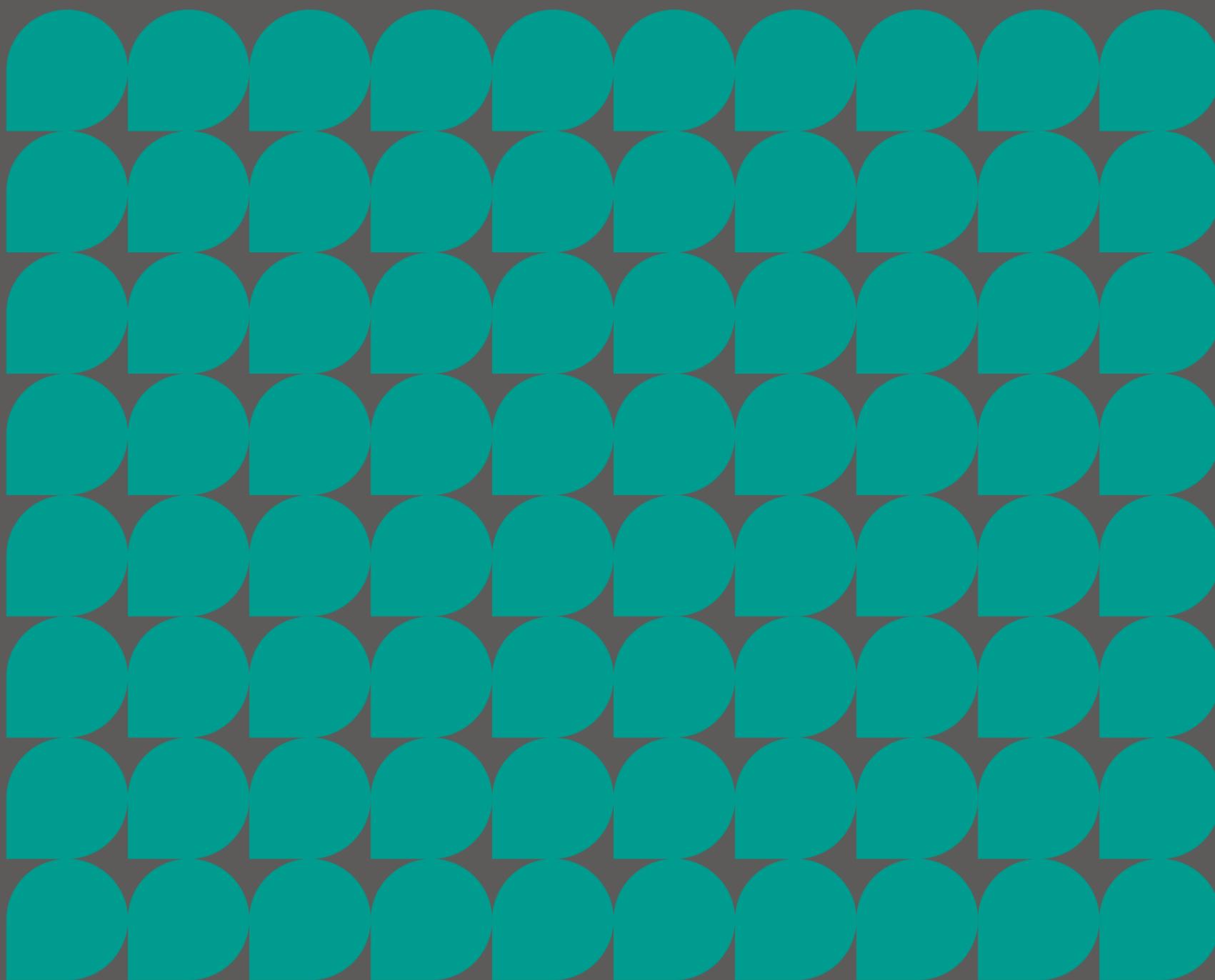


# Places for Everyone

Other Issues Summary

February 2022



# Chapter One, Chapter Two and General/Other Responses

A summary of the issues raised in relation to Chapter One, Chapter Two, Appendix A and general/other responses such as matters relating to consultation, compliance, plan wide and omissions from the Plan.

## PfE 2021 Chapter One - Introduction

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
CH1.1	The introductory sections of the plan contradict other parts of the plan and the statements are not justified, e.g. Paragraphs 1.36. 1.44. 1.47	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. Therefore, it is considered that the introductory chapter provides an appropriate introduction to the PfE Plan.	Philip Bailey
CH1.2	The effectiveness of the public transport investment referred to in Chapter 1 is questioned, including uncertainties in relation to impacts of the national bus strategy. This undermines the soundness of the plan	Chapter 10 sets out a clear strategy in relation to delivering a integrated network. The Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in the GM Transport Strategy 2040 <a href="#">[09.01.01]</a> and in the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> . We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns. Therefore, it is considered that the introductory chapter provides an appropriate introduction to the PfE Plan.	The Chartered Institute of Logistics and Transport in the UK (Martin Arthur)
CH1.3	The plan is unsound, as Chapter 1 fails to explore scenarios to take account of Brexit in relation to public transport, including the changing roles of town centres.	No change is considered necessary. Chapter 1 states that two assessments of the potential impacts of Brexit (and Covid-19) 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> .	The Chartered Institute of Logistics and Transport in the UK (Martin Arthur)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
CH1.4	The plan is unsound as there is no reference in Chapter 1 to necessary transport provision for the allocations	Paragraphs 1.53 to 1.56 summarises the infrastructure required to support the scale and pattern of growth. Appropriately, full details are provided in the relevant thematic and allocation policies. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Chartered Institute of Logistics and Transport in the UK (Martin Arthur)
CH1.5	Paragraph 1.28 should make it clear whether districts will compete against each other whilst boosting the competitiveness of the northern districts	Paragraph 1.28 provides a brief summary of the spatial strategy. Appropriately, full details are provided in the policies within the Strategy Chapter of the Plan. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	PeterThompson
CH1.6	Concern over reference to HS2 in Chapter 1, given the potential impact of it on the SRN, together with the development allocations in the locality	HS2 is a national infrastructure project which will bring opportunities to Greater Manchester and therefore it is appropriate to refer to it in the introductory section of the plan. Detailed transport evidence in relation to the areas around Manchester Airport is provided in the evidence for the relevant allocations, JPA 3.1 Medipark, JPA 3.2 Timperley Wedge and JPA10 Global Logistics. It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary	National Highways
CH1.7	Paragraph 1.39 should be strengthened to reflect the ambition to enhance green infrastructure across the City Region and to deliver a substantial, measurable and widespread net gain in biodiversity	Paragraph 1.39 provides a brief summary of what contributes to a good place. Appropriately, full details in relation to the natural environment, including biodiversity net gain, can be found in the policies in the Greener Places Chapter. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Wildlife Trusts
CH1.8	Paragraph 1.40 should be made clearer that all parts of the strategic green infrastructure network (i.e. not just areas which fall within the Green Belt) will generally be protected from development	Paragraph 1.40 provides a brief summary in relation to green infrastructure. Appropriately, full details in relation to green infrastructure, can be found in the policies in the Greener Places Chapter. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Wildlife Trusts
CH1.9	Chapter 1 should state that brownfield sites can have valuable biodiversity interests which should be protected as they can contribute to ecological networks.	Paragraphs 1.41 to 1.46 provide a summary of the strategic approach to using brownfield land across the plan area. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Wildlife Trusts
CH1.10	The pledge to keep fossil fuels in the ground should be extended to cover peat. Without this the aspirations of the districts to meet their 2038 target will be undermined, particularly as some allocations are proposed on peat.	It is considered that as drafted, Chapter 1 appropriately reflects the policy aspiration in Chapter 5. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
CH1.11	The statement at paragraph 1.32 referencing new jobs at Manchester airport is not consistent with climate change objectives	Paragraph 1.32 identifies where the majority of new jobs are being proposed, it appropriately identifies Manchester Airport as a place of employment. It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary	The Wildlife Trusts
CH1.12	The method for estimating future employment land needs based upon extrapolating forward past trends is not justified given the need to tackle biodiversity and climate change	It is considered that the approach to estimating employment land is justified and robust, as detailed in the Employment Topic Paper [05.01.04]. Therefore, no change is considered necessary	The Wildlife Trusts
CH1.13	Agree with the conclusion at paragraph 1.9 that there is insufficient evidence at this moment in time to change the growth targets set within the plan, however this should not result in a cautious approach to growth in the early years and instead of relying on a review of PfE to address changes in circumstances, this could be done via district local plans	It is considered that the approach adopted in relation to the impact or otherwise of Covid and Brexit is justified in light of the COVID-19 and Places for Everyone Growth Options [05.01.03] paper	PD Northern Trust Asset Management
CH1.14	Whilst supporting the principle of the Plan's approach to becoming carbon neutral by 2038 (outlined in 1.52) there is insufficient evidence to justify its application to non-residential development	It is considered that a proportionate evidence base has been provided to support the policy approach to carbon neutrality, it can be found in documents 04.01.01 to 4.01.05 in section 4 of the <a href="http://greatermanchester-ca.gov.uk">Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</a>	Derwent Group
CH1.15	Reference should be made to the Peak District National Park given the role it performs for residents of the PfE Plan area, in particular those in Oldham.	As drafted it is considered that Chapter 1 provides an appropriate introduction to the PfE Plan. It is not considered that the changes being requested are a soundness issue, therefore, no change is considered necessary	Peak District National Park Authority
CH1.16	Endorsement and support the option for introducing an early review of the Places for Everyone plan, together with each local authority reviewing their own Local Plans. This will ensure the PfE Plan delivers as expected	Comment noted	LQ Estates and Trafford HT
CH1.17	The level of housing growth proposed in chapter exceeds the LHN target quoted in paragraph 1.36. As a result the loss of Green Belt is not justified	As identified in the Places for Everyone Strategic Viability Assessment Stage 1 2020 [03.01.01] there are viability challenges with some of the land supply identified. However, as the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently, in line with NPPF a significant amount of the land supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. Therefore, no change is considered necessary	Philip Bailey

## PfE 2021 – Chapter Two Context

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
CH2.1	Concern over reference to HS2 in Chapter Two, given the potential impact of it on the M56 corridor, together with the development allocations in the locality	It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary. HS2 is a national infrastructure project which will bring opportunities to Greater Manchester and therefore it is appropriate to refer to it in the context section of the plan. Detailed transport evidence in relation to the areas around Manchester Airport is provided in the evidence for the relevant allocations, JPA 3.1 Medipark, JPA 3.2 Timperley Wedge and JPA10 Global Logistics.	National Highways
CH2.2	Concern over reference to HS2 in Chapter Two, given the potential impact it could have on the natural environment and appropriate safeguards should be included in PfE	It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary. HS2 is a national infrastructure project which will bring opportunities to Greater Manchester and therefore it is appropriate to refer to it in the context section of the plan. Environmental impacts associated with the proposal will be assessed through due process, outside the scope of this plan.	The Wildlife Trusts
CH2.3	Concern over reference here to promoting significant growth in the north of Greater Manchester and rebalancing the uneven employment distribution and disparity in housing between north and south Manchester, given the potential impact on key SRN pressure points on the M62 corridor, M61 corridor and M66 and to exacerbate existing traffic issues	It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary. Chapter 2 provides an appropriate summary of the growth and spatial strategy contained within the Plan. Proportionate, robust transport evidence is provided in relation to the relevant allocations.	National Highways
CH2.4	Concern over reference here to the future growth of Manchester Airport given its conflict with the 2038 target	It is not considered that the issue raised here is a soundness issue, therefore no change is considered necessary. Chapter 2 appropriately identifies Manchester Airport as an area of growth, reflecting its position in the conurbation and approved growth in and around the airport	The Wildlife Trusts
CH2.5	References to the environment should be strengthened in this chapter	It is not considered that the changes being requested are a soundness issue, therefore no change is considered necessary.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Chapter 2 provides a brief summary of the context for the Plan in relation to the natural environment. Appropriately, full details in relation to the policy framework for the natural environment, can be found in the policies in the Greener Places Chapter.	
CH2.6	Concerned that falling population figures have not been taken into account	It is considered that the approach to population projections and calculations in relation to housing need, as set out in the Housing Topic Paper <a href="#">[06.01.03]</a> and the Strategic Housing Market Assessment <a href="#">[06.01.02]</a> is consistent with national policy. Therefore no change is considered necessary	CPRE
CH2.7	There should be an increased focus on active travel and greenspace provision within the chapter	It is not considered that the changes being requested are a soundness issue, therefore no change is proposed. Chapter 2 provides a brief summary of the context for the Plan in relation to transport and the natural environment. Appropriately, full details in relation to the policy framework for transport and the natural environment, can be found in the policies in the Connected and Greener Places Chapters.	CPRE
CH2.8	The Peak District National Park boundary should be shown in Figure 2.1 to reflect its role for residents of the PfE Plan area, in particular those in Oldham.	Disagree. Figure 2.1 shows a map of the PfE district boundaries, it is not considered appropriate to provide this level of detail in such an illustrative map	Peak District National Park Authority
CH2.9	The Plan's policies are not sufficiently ambitious to capitalise on the assets listed or the overall ambitions set out in this chapter to reduce the inequalities and ensure Manchester is a Global City and the 'main driver of the northern economy'	Disagree. It is considered that the policies in the PfE Plan meet the vision and objectives and will make the most of our assets. No change is considered necessary	PD Northern Steels PD Northern Trust Asset Management
CH2.10	A separate sub-section should be included to contextualise the rest of the city region (not just the Core Growth Area) in terms of its scale, population, household stock, etc. This would provide greater clarity and context for the intended vision and spatial strategy set out in the following Chapters of the PFE plan	It is considered that Chapter Two provides sufficient context for the rest of the PfE Plan. References are made throughout the chapter to all parts of the plan area, for example paragraphs 2.4 to 2.9 and 2.29 to 2.32. Therefore no change is considered necessary	PD Northern Steels
CH2.11	Paragraph 2.7 only lists Brexit and Covid as the key challenges facing the districts, climate change and biodiversity should also be	It is considered that Chapter Two provides sufficient context for the rest of the PfE Plan. Paragraph 2.7 appropriately refers to Brexit and	Peter Thompson The Wildlife Trusts

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	listed. The proposals in the plan do not appear to have taken climate changes into consideration and will make matters worse.	Covid in the context of the chapter. Climate issues are addressed in Chapter 5 and were taken into consideration through the <a href="#">Strategic Environmental Assessment</a> . No change is considered necessary	

## PfE 2021 – Appendix A Replaced District Local Plans

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
APPA.1	<p>The Protected River Valley Policy in Bury's Local Plan should be retained. The removal of this policy protection did not form part of the consultation and is unlawful</p>	<p>Appendix A refers to PfE Policy JP-G3 (River Valleys and Waterways) replacing Bury's UDP Strategic Part 1 Policy on River Valleys (OL5). Three Part 2 policies sitting underneath OL5 are to be saved until they are replaced through Bury's Local Plan:</p> <p>OL5/1 – Designation of River Valleys – which effectively justifies the designated River Valley boundary;</p> <p>OL5/2 – Development in River Valleys – which sets out the approach towards development in designated River Valley areas; and</p> <p>OL5/3 – Riverside and Canalside Development in Urban Areas – which seeks to ensure that new riverside or canalside development maintains an open corridor.</p> <p>Therefore, there will be continued protection afforded to these areas through both the PfE and Bury's local Plan.</p>	David Bentley
APPA.2	<p>Concern that the policies being superseded by the PfE Plan will leave a policy vacuum in terms of the historic environment at the local level. The changes to existing local plan policies should be set out clearly in a supporting document or reference to the relevant paragraph numbers and criteria being superseded should be included in Appendix A.</p>	<p>It is considered that Appendix A provides an appropriate level of detail in terms of identifying which policies are to be replaced.</p> <p>Appendix A refers to a number of strategic policies in existing district local plan policies which will be replaced by the PfE Plan. These do not form the entirety of policy protection in the districts in relation to the historic environment. The detailed, "part 2" style policies are to be saved until they are replaced through the districts' individual Local Plans. Therefore, there will be continued protection afforded to historic environment through both the PfE and district local plans.</p>	Historic England

## PfE 2021 – Consultation Issues

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
CON1	The consultation and the preparation of the PfE should have been suspended until the planning reforms have been completed	As made clear by the Government's Chief Planner, the Government has made it very clear that local planning authorities should not delay plan preparation. For example please see the <a href="#">Chief Planners Newsletter April 2021 (publishing.service.gov.uk)</a> . No change required	Fran Greer Andrew Richardson
CON2	The quality, timing and nature of the public consultation and engagement has been inadequate for a plan of this nature particularly during a pandemic. The methods used have been difficult to navigate and the material too complicated. Information should be made available to all residents affected by the proposals. The consultation has not met Statements of Community Involvement and/or the Gunning Principles and the consultation should be repeated	It is acknowledged that the Regulation 19 version of the Plan is accompanied by a large amount of supporting documentation however, a number of steps were taken to assist readers in understanding the material. This included topic papers explaining the technical evidence base, which were provided on the <a href="#">Supporting Documents</a> page of the GMCA website. Additionally the <a href="#">Consultation 2021</a> pages on the GMCA website had explanatory information about the consultation, including FAQs and how to make an effective representation and in anticipation of continued restrictions arising from the pandemic, the PfE districts also developed a <a href="#">virtual exhibition space</a> . In relation to the details of the consultation / engagement, the Regulation 22 Statement of Consultation includes individual compliance statements for each of the nine districts. Therefore, it is considered that the consultation met the requirements of the relevant regulations.	See appendix
CON3	It should be possible to respond to the consultation by methods other than the portal. Using only the portal excludes and deters people from responding	As detailed in the <a href="#">statement of representation procedure</a> it was possible to make representations via the online portal, email or letter.	Fran Greer
CON4	Links on the GMCA were not working properly during the consultation	Where this brought to the team's attention, action was taken as soon as possible	Paul Burns
CON5	the documents produced are too lengthy and complicated to understand what is proposed and therefore to enable effective engagement	It is considered that the Plan is supported by proportionate evidence, required to justify the plan in accordance with NPPF section 3. However, in view of the technical nature of some of the evidence	Paul Burns Ceridwen Haslam

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		base documents, topic papers were provided on the <a href="#">Supporting Documents</a> page of the GMCA website to explain the evidence base.	
CON6	Only comments submitted at the Regulation 19 stage count therefore reference has been included to previous submissions	Noted. As detailed in the <a href="#">statement of representation procedure</a> representations at the Regulation 19 stage of the plan making process should only relate to PfE 2021.	Harworth Group Plc. Redcliff Estates Steven Breheny Tarleton Estates Limited Lilford 2005 Limited

## PfE 2021 Relationship with District Local Plans

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
LP1	The Plan refers to each PfE authority producing its own local plan and masterplans for the allocations. No details have been given about when these plans will be available and what the scope will be for these plans and whether development will be able to proceed before they are approved. This detail should be included in the PfE Plan and there should be a commitment to bringing forward local plans at the earliest opportunity to enable local engagement and to avoid development taking place in unsustainable locations	The production of more detailed local plans and/or masterplans will be part of the delivery mechanism for policies in this plan, as required within the policies of PfE. The timetables for the individual local plans will be a matter for the individual districts to agree. Details will be made available within the relevant district's Local Development Scheme and engagement will be in line with individual Statements of Community Involvement. Similarly, the scope of the local plans will be a matter for the individual districts to determine. Chapter 11 (paragraph 11.5) details that some additional sites outside the urban area are required to deliver our inclusive growth needs and makes it clear that it is the role of this plan to identify these sites. Therefore, no change is necessary	See appendix
LP6	The PfE Plan should make it clear what is to be covered in the district local plans and this should include the need for the district local plans to assess/review the need for development. If there are additional needs to those in the PfE, Local Plans should allocate land to meet any such identified needs, including within the Green Belt	No change is considered necessary. The scope of the local plans will be a matter for the individual districts to determine. However, paragraphs 1.57 and 1.58 make it clear that the PfE sets the strategic spatial context for the nine district local plans. Chapter 11 (paragraph 11.5) details that some additional sites outside the urban area are required to deliver our inclusive growth needs and makes it clear that it is the role of this plan to identify these sites. Therefore, the allocations identified in PfE together with the existing land supply are considered to provide sufficient land to meet the land supply targets in Chapters 6 and 7 of the Plan.	Peel L&P Investments (North) Ltd HIMOR Group BDW Trading Ltd Jones Homes (North West) Ltd PD Northern Steels PD Northern Trust Asset Management
LP8	The Plan should make it clear how the housing requirements will be translated into local plans. For example, will district local plans be able to amend the housing targets in PfE and will each PfE district be responsible for managing and delivering their respective apportionments within Table 7.2	No change is considered necessary. Policy JP-H1 states that each local authority will monitor delivery rates within their area and will take action as necessary.	Home Builders Federation BDW Trading Ltd Jones Homes (North West) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
LP9	Overall the plan lacks flexibility given the lack of detail in relation to local plans	No change is considered necessary. The scope of the local plans will be a matter for the individual districts to determine. However, paragraphs 1.57 and 1.58 make it clear that the PfE sets the strategic spatial context for the nine district local plans.	Peel L&P Investments (North) Ltd

## PfE 2021 – SEA / Integrated Assessment / Sustainability Appraisal

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Integrated Assessment		
SEA.1	The Sustainability Appraisal Scoping Report fails to specifically identify the Green Belt as a key issue or objective, instead it is included in the Green Infrastructure section	<p>The Green Belt as an issue is discussed at Section 4.2.6.1 of the <a href="#">Integrated Assessment Scoping Report</a> (02.01.01).</p> <p>The IA objectives and assessment criteria are considered to be robust and in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the Integrated Assessment Scoping Report (02.01.01) and the <a href="#">Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal</a>.</p>	Stephen Cluer
SEA.2	Sustainability Appraisal Scoping Report: It provides a weak test in relation to impact on wildlife, it should go further than "avoid" damage/destruction	<p>The IA objectives and assessment criteria are considered to be robust and in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the <a href="#">Integrated Assessment Scoping Report</a> (02.01.01) and the <a href="#">Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal</a>.</p>	Stephen Cluer
SEA.3	The justification for the use of differing data sources and time scales for the data in the Sustainability Appraisal Scoping Report is unclear. For example in relation to the use of differing ONS data, data relating to the housing markets, LHN references for Greater Manchester between 2018 and 2037 etc.	<p>It is considered that the Integrated Assessment Scoping Report (02.01.01) is robust and has been prepared in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the <a href="#">Integrated Assessment Scoping Report</a> (02.01.01) and the <a href="#">Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal</a>.</p>	Stephen Cluer
SEA.4	Sustainability Appraisal Scoping Report does not adequately enable the consideration of the impact of working from home, which will affect mix and type of homes in the future and the need for new employment floorspace	<p>It is considered that the Integrated Assessment has been prepared in accordance with the requirements of the Strategic Environmental Assessment regulations, as outlined in Section 2.1.1 of the <a href="#">Integrated Assessment Scoping Report</a> (02.01.01) and the <a href="#">Government's Planning Practice Guidance: Strategic Environmental Assessment and Sustainability Appraisal</a>.</p>	Stephen Cluer

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The impact of the Covid-19 Pandemic on housing and economic growth in the PfE, including trends in working from homes, are considered in the <a href="#">Covid-19 and PfE Growth Options paper</a> (05.01.03).	
	Equalities Impact Assessment		
SEA.5	An Equalities Impact Assessment should be carried out for each allocation	An Equalities Impact Assessment has been worked into the Integrated Assessment objectives and criteria, and has been carried out for each PfE allocation. See Section 2.1.2 of the <a href="#">Integrated Assessment Scoping Report</a> (02.01.01).	Matthew Chandler

## PfE 2021 Duty to Co-operate

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
DTC1	No details have been provided as to how the "Duty to Cooperate" will be achieved. It is not acceptable to limit the Duty to Co-operate with neighbouring boroughs to Stockport, each of the authorities in the plan the area has their own neighbours	As detailed in <a href="#">Section One</a> of the supporting documents list (Duty to Co-operate) a Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021. These documents have since been updated to reflect the ongoing engagement with our neighbouring authorities and duty to co-operate bodies. It is considered that these documents demonstrate effective and on-going collaboration in line with NPPF	See appendix
DTC2	It is unclear what agreements are in place with Stockport and whether they will be relying on the other 9 districts to meet part of its need going forward. Although the PfE districts are not obligated to carry Stockport's housing requirement, the Duty to Co-operate does require the matter to be explored and it is clear from previous iterations of the GMSF that there was capacity within the nine PfE authority areas to accommodate some of Stockport's needs either through urban supply or the release of additional Green Belt land. The Duty to Co-operate has not been satisfied when it comes to meeting housing needs, particularly in relation to meeting unmet needs within Stockport.	A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in <a href="#">Section One</a> of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate Stockport. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date in terms of employment and housing, respectively. As explained in that document, Stockport MBC has been unable to provide evidence demonstrating unmet need.  In the light of this, the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone	Highgrove Strategic Land Ltd Rowland Homes Ltd Gordon Tilstone Hillary Rhoden Janine Lawford PD Northern Trust Asset Management Taylor Wimpey Woodford Neighbourhood Forum
DTC3	The nine districts need to continue to work with Stockport, despite their withdrawal from the joint plan. Failing to do so would be contrary to Duty to Co-operate	No change necessary. The Duty to Co-operate Statement, Log of Collaboration and Statement of Common Ground in submitted with the Submission documentation detail the co-operation with Stockport	Housebuilding Consortium

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		to date and the fact that the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester	
DTC4	The Plan should not be submitted until further discussions have taken place about meeting Stockport's unmet housing needs	Disagree. It is not considered reasonable to delay the preparation of PfE until the Stockport Local Plan and its evidence are further progressed. Instead, the Statement of Common Ground submitted with the Submission documentation makes it clear that the PfE districts are seeking to agree a process for future engagement with Stockport Council regarding the proposed scale and distribution of development across Greater Manchester which respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.	Haf Barlow
DTC5	There is concern in terms of the delivery of transport infrastructure following Stockport's withdrawal. Stockport will play an important part in boosting the southern competitiveness, but it is not clear whether Stockport will be able to proceed with its local plan in the same timescale as PfE and there remain unresolved transport issues overlapping with areas in PfE, such as around Manchester Airport	Whilst Stockport Council's decision to withdraw from the GMSF in December 2020 signalled the end of the joint plan of ten districts, Stockport remains in Greater Manchester. The duty to co-operate documents in <a href="#">Section One</a> of the supporting documents list (Duty to Co-operate) demonstrate the level of continued collaboration with Stockport, including around transport matters. Therefore, although timescales are understandably different for the two plans, PfE and Stockport's Local Plan, there will be continued collaboration on strategic transport matters both through plan making but also through other Greater Manchester partnerships	The Chartered Institute of Logistics and Transport in the UK (Martin Arthur)
DTC6	Duty to co-operate means to co-operate with the needs and opinions of the local people, the local people do not want the new houses on green spaces and the plan should be stopped	Duty to co-operate is a legal obligation under S33A of the Planning & Compulsory Purchase Act 2004 as amended. The list of organisations that the PfE districts need to co-operate with is detailed in the Statement of Common Ground, published alongside the PfE2021 in <a href="#">Section One</a> of the supporting documents list. Separate to this, the individual districts are required to carry out engagement in line with their individual Statements of Community Involvement. The	Susan Peat Peter Christie Kaitlyn Stockport

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Regulation 22 Consultation Document details the districts' compliance with these statements. It is considered that the PfE districts have met their obligations in respect of both matters and no change is needed	
DTC7	There does not appear to be any allowance for meeting unmet need arising from neighbouring authorities particularly Stockport. The situation with Stockport is only one example and it is probable that the GMCA has made similar failings with other neighbouring authorities	A Duty to Co-operate Statement, a Log of Collaboration and a draft Statement of Common Ground were all made available alongside the Publication draft PfE2021 in <a href="#">Section One</a> of the supporting documents list (Duty to Co-operate) and these documents have since been updated and submitted with the Submission documentation. Collectively these documents demonstrate that the PfE districts have met their Duty to Co-operate not only with Stockport, but also their other neighbouring districts. Specifically, sections 10 and 11 of the Statement of Common Ground summarise the collaboration to date in terms of employment and housing, respectively. It is considered that the PfE districts have met their obligations in respect of Duty to Co-operate and no change is needed	Steven Breheny
DTC8	It is incorrect to state that the 35% uplift in Manchester's LHN must be met within Manchester alone and cannot be met elsewhere within the nine districts such as Salford, Trafford and Oldham. Agreement in relation to this matter should be reached through the provisions of Duty to Co-operate	Disagree, NPPG paragraph 035 Reference ID: 2a-035-20201216 is clear that the 35% uplift applied to should be met by the cities and urban centres themselves and not the surrounding areas. Therefore, as Manchester City is the only PfE district to which this applies, the uplift should be met within its district	PD Northern Trust Asset Management
DTC9	Whilst noting Cheshire East's position, there should be greater clarity in relation to how anticipated growth from Manchester Airport, Airport City and the HS2 Airport connection will impact on development needs and environmental impacts in Cheshire East	No change considered necessary. It is considered that effective collaboration has taken place between key partners in this area (particularly Cheshire East, Manchester Airport and National Highways), see <a href="#">Section One</a> of the supporting documents list and that the plan is supported by a <a href="#">proportionate evidence base</a> thus ensuring that the impacts on Cheshire East have been considered appropriately	PD Northern Trust Asset Management
DTC10	It is acknowledged that there is ongoing work through the Highways England Future Work Programme, however the aims of that work are	Collaboration with National Highways has been ongoing since the Publication PfE documentation was published in August 2021.	National Highways

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	only partially set out in paragraph 9.14, and so should be more fully defined to cover the scope of that work.	Updated documentation has been produced and submitted as part of the Submission documentation, which details the current position between the PfE districts and National Highways. As such it is considered that the PfE districts have met their obligations in respect of Duty to Co-operate and no change is needed	
DTC11	A request has been made for a separate Statement of Common Ground with the combined authority to cover matters agreed with respect to the impact of the PfE at the SRN. Although it is recognised that substantial evidence has been provided as part of the PfE process, the existing Statement of Common Ground does not provide sufficient detail, particularly as work is still ongoing. Therefore a separate SoCG should be prepared more fully defines the scope of the ongoing work	Collaboration with National Highways has been ongoing since the Publication PfE documentation was published in August 2021. Updated documentation has been produced and submitted as part of the Submission documentation, which details the current position between the PfE districts and National Highways. As such it is considered that the PfE districts have met their obligations in respect of Duty to Co-operate and no change is needed	National Highways
DTC12	Duty to co-operate has been failed in relation to minerals	Disagree, Section 9 of the Submission version of the Statement of Common Ground (together with the Submission Log of Collaboration) demonstrates that the PfE districts have met their duties in relation to this matter.	Mineral Products Association

## PfE 2021 Legality of the Plan

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	GMSF to PfE		
LEG1	The legality of the Plan needs to be tested in the courts. The changes between the GMSF 2020 draft and the PfE 2021 are too significant for the PfE 2021 Plan to proceed to Regulation 19 without a further Regulation 18 consultation stage	Sections 2 and 3, together with Appendix 1 of the report to the <a href="#">Places for Everyone Joint Committee, 20/07/2021</a> sets out the extent/nature of the changes, further details on the <a href="#">changes from GMSF to PfE2021</a> were also made available in the supporting documents. Having considered this evidence, the Committee resolved that the Places for Everyone Publication Plan 2021 has substantially the same effect on the remaining 9 districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan) as the Greater Manchester Plan for Homes, Jobs and the Environment (GMSF 2020). As such the provisions of S.28 (6)-(9) of the Planning and Compulsory Purchase Act 2004 and regulation 32 of the Town and Country Planning Local Plan Regulations apply to the Plan. Therefore, the progression of the PfE Plan to Publication is considered in accordance with the relevant provisions of the Act and Regulations.	See Appendix
	Compliance with NPPF		
LEG2	The plan needs to ensure compliance with National Policy NPPF para 138 parts a,c and e	It is considered that the evidence provided in the Greener Places <a href="#">Greener Places</a> part of the supporting documents demonstrates compliance with these sections of NPPF, together also with the individual allocation supporting documents	Elizabeth Forrest Carol Birchmore David J Arnfield
LEG3	The PfE Plan has not been prepared in accordance with legal and procedural requirements as it is not in accordance with national policy and therefore it does not meet the requirement of soundness	It is considered that a proportionate evidence base has been provided to support the Plan and demonstrate that it has been prepared in accordance with legal and procedural requirements. The evidence base can be found the website here: <a href="#">Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</a>	Zoe Sherlock Robert Birchmore

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
LEG4	The plan has failed to demonstrate exceptional circumstances to amend the Green Belt, as required by NPPF	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>	See Appendix
LEG5	The Plan needs to be checked for consistency against the latest iteration of NPPF published on July 20th 2021 as this was after the Plan had been written	It is considered that the Plan remains consistent with NPPF, including the latest iteration published in July 2021	Redrow Homes Limited
	Compliance with Statements of Community Involvement		
LEG6	A number of the local Councils, including Bury, Oldham and Rochdale have failed to comply with their Statement of Community Involvement	The Regulation 22 Statement of Consultation provides details of the consultation / engagement including individual compliance statements for each of the nine districts. These documents demonstrate that the consultation met the requirements of the relevant regulations.	See Appendix
LEG7	Early stages of engagement on the GMSF were inadequate	The Regulation 22 Statement of Consultation provides details of the consultation / engagement including the early stages of the GMSF. These documents demonstrate that the consultation met the requirements of the relevant regulations.	Woodford Neighbourhood Forum
	General issues of legality		
LEG8	Legal advice in relation to the overall legality of the plan should be published	The overall legality of the plan is a matter for the Independent Examiners to determine through the Examination. Therefore this advice does not exist	Elisabeth Berry
LEG9	The plan is considered to comply with the Local Development Scheme, the Statement of Community Involvement and Duty to Co-operate.	Comment noted	Prospect GB and Dobinetts Regen

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Reasonable Alternatives		
LEG10	The PfE Plan has not been prepared in accordance with legal and procedural requirements and therefore does not meet the requirement of soundness. There has been no consideration of the reasonable alternatives.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> . The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The Plan has also been subject to an <a href="#">Strategic Environmental Assessment</a> . It is therefore considered that appropriate consideration of reasonable alternatives has been undertaken	Lucia Sollazzi-Davies Susan Sollazzi M Walsh G R Walsh Claudia Sollazzi
LEG11	The nine Councils should ensure that the results of the IA process clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against 'all reasonable alternatives'. The decision making, and scoring should be robust, justified, and transparent.	Noted. It is considered that the conclusions in the documents within the <a href="#">Strategic Environmental Assessment</a> have been incorporated as appropriate in the plan making process. The difference the IA made to the preparation can be found in the Integrated Assessment Main Report <a href="#">[02.01.02]</a> and the related addendum report <a href="#">[02.01.04]</a>	Gladman Developments
LEG12	PfE is not legally compliant because it was produced before the Environment Bill and takes no account of the Bill and the proposals are contrary to the Bill. There should be more emphasis on brownfield sites and the Green Belt sites, should be removed as there is sufficient land in the existing supply to meet the needs	As made clear by the Government's Chief Planner, the Government has made it very clear that local planning authorities should not delay plan preparation. For example please see the <a href="#">Chief Planners Newsletter April 2021 (publishing.service.gov.uk)</a> . Notwithstanding this fact, it is considered that the policies contained within the Green Places Chapter is consistent with the Environment Bill	Paul Burns

## PfE 2021 Plan Wide Comments

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	General comments		
PW1	Places for Everyone should be redirected to focus on the climate emergency rather than economic growth	The PfE is strategic planning document which has been prepared in accordance with national policy. Whilst one of the aims is to provide sufficient land to meet the estimated economic growth, climate issues are also addressed in the Plan, in particular within Chapter 5. They were also taken into consideration through the <a href="#">Strategic Environmental Assessment</a> . Therefore, no change is considered necessary	Claudia Sollazzi
PW2	Broad support for bringing forward a strategic planning document such as this	Comment noted	Homes England Mossley Town Council
PW3	Overall the plan lacks flexibility in terms of its approach to monitoring	It is considered that the statements in Chapters 1, 6, 7 and the monitoring framework in Chapter 12 provide an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. Therefore, no change is considered necessary	Peel L&P Investments (North) Ltd
PW4	The PfE policies are not sufficiently aligned with other policies, in particular the level of housing growth is not sufficiently aligned with the economic ambition and the strategic transport plans. Therefore, overall the Plan lacks the level of development to match the growth ambitions and does not allocate land required to meet all housing, employment, infrastructure and community use needs across the respective nine authorities	As detailed in the Housing Topic Paper <a href="#">[06.01.03]</a> Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. We do not consider that exceptional circumstances exist to justify departure from the standard methodology.  The Growth and Spatial Options Paper <a href="#">[02.01.10]</a> considers the implications of alternative growth options and concludes that the local housing need calculated using the standard method represents the preferred growth option and the best fit with the overall ambitions of the nine districts. No change necessary.	Peel L&P Investments (North) Ltd PD Northern Trust Asset Management PD Northern Steels

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW5	Policies are vague, unclear and ambiguous and some unnecessarily duplicate NPPF	No change is considered necessary. The Plan is considered to provide an appropriate level of detail for a strategic plan of this nature, providing the necessary policy framework for district local plans. Where duplication of NPPF exists, it is considered appropriate/necessary and has been kept to a minimum. Therefore no changes is considered necessary as it is consistent with NPPF	Peel L&P Investments (North) Ltd Anne Isherwood
PW6	In its totality this plan will result in unsustainable development, contrary to NPPF, as there is no evidence that the new homes and jobs are needed for the existing residents. It could result in bringing more people in from outside Greater Manchester and having a negative impact on the environment.	No change necessary. As detailed in the Housing Topic Paper <a href="#">[06.01.03]</a> and the Employment Topic Paper <a href="#">[05.01.04]</a> the housing and employment targets are considered to be justified and consistent with NPPF. Additionally the Plan has been subject to a full Sustainability Appraisal, full details of which can be found in the <a href="#">Strategic Environmental Assessment</a>	Susan Sollazzi
PW7	Insufficient attention has been paid to the impact of Covid and Brexit. Consequently the overall housing and employment needs have been overstated and should be adjusted	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> .	See Appendix
PW8	The Plan should be modified to take account of the requirements of the Devolution Deal in that it is not a Mayoral Plan for the whole conurbation	In July 2021, the nine districts agreed to continue to produce a joint development plan to set the strategic spatial context for the nine district local plans. Any decision in relation to preparing a Spatial Development Strategy would be outside the process of producing this joint development plan of the nine PfE districts. Therefore, no change necessary	PD Northern Steels
PW9	The Plan should be modified as it does not fully address the requirements of Greater Manchester on the basis that Stockport is now excluded. Therefore, although it sets strategic level policies and allocations it does not complete the development plan policy framework across the conurbation or even the 9 relevant Local Planning Authorities	No change considered necessary. Following the decision made by Stockport Council in December 2021 the <a href="#">AGMA Executive Board 12.02.21</a> a considered the merits of continuing to produce a joint plan of the nine remaining GM districts. Following consideration of that report Members resolved to pursue a joint plan of the nine, which would enable the remaining districts to accommodate the	PD Northern Steels PD Northern Trust Asset Management

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		development needs of the nine whilst aligning with wider Greater Manchester strategies for transport and other infrastructure investment. The impact that this decision has had on the approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> . As set out in paragraph 1.57, each district will continue to produce a local plan, thus completing the development plan policy framework for the districts	
PW10	The Plan should be modified because whilst the volume of evidence is significant it has still been gathered and presented in the context of a strategic, high-level plan	No change considered necessary. The PfE Plan is a high level, strategic plan, therefore if it is considered that an appropriate evidence base has been provided to support the policy, it can be found in the <a href="#">Supporting Documents</a>	PD Northern Steels
PW11	The Plan should be modified as it does not address detailed boundary changes that are best assessed at the Local Plan stage	No change necessary. Paragraph 1.57 makes it clear that the PfE Plan is a strategic spatial plan and each district will continue to produce a local plan. The scope of those local plans is correctly a matter for districts to determine. However, paragraph 11.5 makes it clear that it is the role of the PfE plan to identify those sites outside the urban area which are required to deliver our inclusive growth needs, thus ensuring that sufficient land is available within in the plan period.	PD Northern Trust Asset Management PD Northern Steels
PW12	The Plan should be modified as several of the strategic policies would benefit from being more specific, in terms of whether they are to be addressed through Local Plans or development management processes	No change necessary. Paragraph 1.57 makes it clear that the PfE Plan is a strategic spatial plan and 1.58 makes it clear that the plan will become part of the relevant authority's development plan. It is clear therefore that it will be taken into consideration at the development management stage	PD Northern Steels
PW13	The documents are deliberately long to stop people responding	No change necessary. It is acknowledged that the Regulation 19 version of the Plan is accompanied by a large amount of supporting documentation however, a number of steps were taken to assist readers in understanding the material. This included topic papers explaining the technical evidence base, which were provided on the <a href="#">Supporting Documents</a> page of the GMCA website. Additionally the	Paul Roebuck

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<a href="#">Consultation 2021</a> pages on the GMCA website had explanatory information about the consultation, including FAQs and how to make an effective representation and in anticipation of continued restrictions arising from the pandemic, the PfE districts also developed a <a href="#">virtual exhibition space</a> .	
PW14	It is unclear who the plan is designed to benefit	No change necessary. It is considered that Chapter One provides an appropriate introduction to the Plan explaining the purposes of the Plan and who it is for.	Peter Thompson
PW15	The words 'accessible' and 'accessibility' should be clearly defined in the Plan, or alternative words used, so that the policies are clear and therefore sound	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. Therefore, no changes are necessary	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
PW16	Whilst proposals to protect green infrastructure are welcomed, they cannot be effective given the National Highways proposal at Mottram, Tameside	No changes necessary. The National Highways proposal at Mottram, Tameside is outside the scope of this Plan	Christine Walton
PW17	General support for the principle of producing a joint plan, however neighbourhood plans should be produced first, feeding into local plans which in turn feed into the joint PfE Plan	No change necessary. NPPF (para 13) makes it clear that Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies. Furthermore, footnote 18 of NPPF makes it clear that Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. Therefore the strategic plans should be produced first, followed by lower tier plans	Jim McMahon
PW18	Although the ambitions of the plan are welcomed, the proposed level of development in the core growth area will undermine area based	Disagree. Although the plan seeks to deliver significant development in the core growth area, Chapter 4 (4.1 - 4.23) summarises the PfE	Greater Manchester Housing Providers

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	regeneration in areas of high deprivation such as Oldham, Rochdale, Salford and Wigan	Spatial Strategy which clearly also seeks to boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>	
PW19	Whilst there is recognition of the need for joint working, it is unclear from the plan if it will happen and whether the proposals will be supported by the necessary infrastructure and therefore, despite the changes since GMSF 2019, the impacts on local communities are likely to be too great	No change necessary. The commitment to producing a joint plan was clearly reaffirmed by the nine district Councils in July 2021 and it is considered that the <a href="#">Supporting Documents</a> demonstrate that the development will be supported by the necessary infrastructure. In particular the relevant allocation policies are supported by a proportionate evidence base, detailing the infrastructure required to support the development. Further details of which can be found in the relevant allocation topic papers. Additionally, Policy D2 states that new development must be supported by the necessary infrastructure. This approach is considered consistent with NPPF as the Plan should be read as a whole.	Debbie Abrahams
PW20	Support, in principle, for many of the PfE Plan policies such as those covering biodiversity, climate change and green infrastructure. However, when read as a whole the Plan and its supporting evidence place a much greater emphasis on the economic and social objectives of sustainable development, as opposed to environmental objectives	No change is considered necessary. The Plan is considered to be consistent with NPPF and balances the economic, social and environmental objectives in line with the Sustainability Appraisal undertaken. Full details of the Sustainability Appraisal, including the scoping report can be found in the <a href="#">Strategic Environmental Assessment</a>	The Wildlife Trusts
PW21	There is no guarantee over delivery rates, there must be a strategy to guarantee delivery, given past poor delivery rates	No change is considered necessary. Chapter 12 provides an appropriate policy framework for the delivery of policies within the plan, consistent with NPPF. Additionally, Chapter 12 sets out a monitoring framework which provides an appropriate level of detail for a strategic plan. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated	See appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW22	There are no details in relation to partners or industries for the employment	No change is considered necessary. The employment policies in this plan and those allocations proposing new employment are considered to be consistent with NPPF and provide an appropriate level of detail given the strategic nature of the PfE Plan. Policy D1 provides details of strategic delivery partners, however, details in relation to site specific partners and/or industries will be a matter for consideration at the planning application stage, as appropriate	Roy Dennett Stephen Cluer Janine Lawford Natasha Cross Steve Buck Adrian Bolton
PW23	Objection to Bolton agreeing to prepare a joint plan with the other GM districts. It should look to work with its other neighbours	No change. The decision of Bolton Council to agree a joint plan with the other eight districts reflects established joint planning with the eight other (previously nine) districts of Greater Manchester	John A Holden
	General approach to allocations		
PW24	Chapter 11 - Agree with principle of the need to allocate sites outside the urban area, however, the overall scale of the allocations in Chapter 11 is insufficient	No change considered necessary. Given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> . Details in relation to options considered is found in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> . Chapter 11 (paragraph 11.5) makes it clear that it is the role of the PfE plan to identify those sites outside the urban area which are required to deliver our inclusive growth needs, thus ensuring that sufficient land is available within in the plan period.	Peel L&P Investments (North) Ltd
PW25	An inconsistent approach has been applied to the requirement, or otherwise, for a masterplan/SPDs and it not clear whether the requirement for such documents is justified. They should not be required for sites less than 500 units and the role of pre application engagement should be recognised.	The Plan is considered to be consistent with NPPF and its policies are considered to be supported by a robust and proportionate evidence base. Where appropriate this evidence supports site specific requirements, including the need for further, more detailed planning documents to be produced as part of the planning process. It is considered that this is correctly applied on a site-by-site basis	Peel L&P Investments (North) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		rather than through a standard threshold as suggested by the respondent. Therefore, no change considered necessary.	
PW26	Overall the plan lacks flexibility in terms of the amount of land allocated and the approach to safeguarding land	No change necessary. As detailed in both the Employment Topic Paper [05.01.04] and the Housing Topic Paper [06.01.03] a margin of flexibility has been included in both the employment and housing land supply, which provides a margin of flexibility to ensure a sufficient choice of sites is available to meet the demand for employment land and to meet the identified housing needs. This land supply is considered to appropriately reflect the outcome of relevant evidence and will also result in surplus land being available at the end of the plan period, which will provide land supply in the early years of the next plan period. Therefore, together with the monitoring framework within the plan, it is considered that the Plan as a whole provides an appropriate policy framework to ensure long-term land supply, consistent with NPPF	Peel L&P Investments (North) Ltd
PW27	The site allocations fail to plan positively for community facilities such as public houses, this is contrary to NPPF para 93	No change considered necessary. When read as a whole it is considered that the Plan recognises the important role that community facilities play in shaping and supporting sustainable places. In particular Policy JP-P3 specifically states that existing community venues, facilities and uses will be protected. Policy JP-P3 is considered to be in accordance with NPPF and provides an appropriate strategy for developing and supporting our cultural businesses and attractions. Paragraph 93 of NPPF does not require an indicative list of community facilities to be listed within planning policies and to do so would result in unnecessary repetition of national policy.	Bolton CAMRA GM CAMRA Trafford & Hulme CAMRA
PW28	There should be no loss of peat or grade 1 agricultural land	No change considered necessary. Development will ordinarily be directed away from valuable soils and the Plan's strong preference for brownfield development will assist in this. However, given the overall scale of development that	AARD - Action Against Rural Development

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		needs to be accommodated, a limited amount of development on high grade agricultural land and/or peat is necessary as it is critical to the delivery of wider development proposals. In these cases, the justification is provided in the site specific allocation topic papers	
PW29	The allocations should not include Sites of Biological Importance; they should be sieved for minerals sites. They should include protected wildlife corridors and make specific reference to a number of important flora and fauna, including ancient woodland, hedgerows, ponds and wetlands, heather moorland and mosses, and peat bodies, nesting birds, legally protected species and priority species. Additionally the proposals should protect important archaeology and historical landscapes	No change considered necessary. The Plan should be read as a whole and it is considered that the Greener Places Chapter provides an appropriate policy framework to deal with this matter, consistent with NPPF. Additionally, it is considered that where these issues relate to allocations, an appropriate evidence base has been prepared and reflecting this evidence base, the allocation policies require development of the site to incorporate mitigation as appropriate.	David Bentley
PW30	Despite the Plan policies seeking to improve green infrastructure and biodiversity, the overall effect will be the deterioration of the green infrastructure network. This is particularly the case in relation to the allocations	No change considered necessary. The PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. It is considered that the Greener Places Chapter provides an appropriate policy framework to deal with this matter, consistent with NPPF. Additionally, it is considered that an appropriate evidence base has been prepared to support the allocations and reflecting this evidence base, the allocation policies require development of the site to incorporate mitigation as appropriate.	The Wildlife Trusts
PW31	Confirmation is sought as to whether greenhouse gas emissions associated with the land use proposed on the allocations located on deep peat soils have been included within the net zero 2038 target	No change considered necessary. The plan should be read as a whole and this and other policies relating to nature based solutions to carbon sequestration (JP-S2) and retention of green infrastructure	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>(JP_G2) provide an appropriate strategy for air quality to help meet climate change objectives, consistent with the NPPF.</p> <p>Further evidence relating to Carbon Offsetting, paragraphs 3.46-48 pages 52-55 of Carbon and Energy Topic Paper <a href="#">[04.01.05]</a></p> <p>Additionally, the PfE Integrated Assessment (IA) document reviewed how the proposed allocations could impact upon the environment, economy, local communities, equality and public health against IA objectives and various mitigations / policy requirements have been included in the relevant allocation policies. See PfE Integrated Assessment <a href="#">[02.01.02]</a>.</p>	
PW32	Support for the removal of sites in Oldham since the GMSF 2019 including Bardsley Vale, Hanging Chadder, Psiiners Way and Thornham Old Road	Comment noted	Jim McMahon Debbie Abrahams
PW33	The impact of the allocations on areas in Bury will be too great	<p>No change considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF, which is applied across the whole plan area, including within Bury.</p> <p>However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>. An evidence base has been prepared to support the allocations and reflecting this evidence base, the allocation policies require development of the site to incorporate mitigation as appropriate.</p>	Tanya Headley Mr & Mrs J. Brown

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW34	The allocations are contrary to the brownfield land preference	No change considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> .	Rosaleen O Donnell
PW35	Specialist housing should be provided, aimed at first time buyers and supported housing projects for older people. There is no need for 4 and 5 bedroomed houses on Green Belt	No changes necessary. Increasing the supply of specialist homes, including affordable homes and homes for older people is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values, tenures, types and size of new housing comes forward so that all households can meet their needs and aspirations. It is considered that the overarching planning framework sets out in the Places for Homes Chapter is consistent with NPPF.	Rosaleen O Donnell
	Approach to Green Belt Additions		
PW36	Overall the plan lacks flexibility in its approach to Green Belt additions	No change is considered necessary. The approach to Green Belt additions is considered to be consistent with NPPF and reflects the evidence base provided. The exceptional circumstances case for the Green Belt additions can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a> . Separate to this and consistent with NPPF Chapter 12 provides an appropriate monitoring framework for a strategic plan of this nature. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated	Peel L&P Investments (North) Ltd
	Plan period		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW37	The Plan period should be reduced, it is not possible to predict what will happen in 15 to 20 years' time	No change is considered necessary. NPPF paragraph 22 makes it clear that strategic policies (such as those within PfE) should look ahead over a minimum 15 year period from adoption	Susan Sollazzi
PW38	The Plan period should be extended to ensure at least 15 years' coverage from adoption. Without this the Plan is contrary to NPPF paragraph 22. Curently the plan period runs from a base date of 2020 to 2037 but it is unlikely to be adopted in 2022	No change is considered necessary. Whilst the PfE Plan period evidence base covers 2020 to 2037, it is acknowledged that if the PfE Plan were to be adopted in 2023, it would provide 14 years' policy post adoption. However, it is considered very likely that when the land supply is updated from its 2020 base date, that sufficient land supply will exist to cover a minimum of 15 years from adoption	Peel L&P Investments (North) Ltd HIMOR Group Hollins Strategic Land Wainhomes (NW) Ltd and Persimmon Homes Wainhomes (NW) Ltd
PW39	The time period over which the Places for Everyone Plan will run is unclear. Policy JP H1 states that the housing requirement is to be delivered over the period 2021-2037. This should be stated on the front cover of the Plan.	No change is considered necessary. Chapter one clearly refers to the plan period being 2021-2037, this is reflected in both the housing and employment targets	Home Builders Federation
PW40	The requirement in NPPF, para 22, for at least a 30 year vision is relevant to PFE, particularly as some allocations include delivery beyond the plan period.	The Regulation 19 version of the PfE had already been published for approval by the individual districts at the time the NPPF was revised in July 2021. At that point in time no definition had been provided in NPPF or NPPG for the phrase "larger scale developments such as new settlements or significant extensions to existing villages and towns". Therefore, it was considered appropriate to proceed with the Regulation 19 consultation with a view to reviewing the position following the consultation, should guidance be published. NPPG was revised in October 2021 and clarifies that the new policy requirement in paragraph 22 applies "where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period." [NPPG Paragraph: 083 Reference ID: 61-083-20211004]. It is therefore considered that the PfE Plan has been prepared in accordance with	HIMOR Group Hollins Strategic Land Wainhomes (NW) Ltd

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		the new element of NPPF paragraph 22 and no change is required to the Plan	
PW41	Overall the plan lacks flexibility in terms of the plan period	No change is considered necessary. Whilst the PfE Plan period evidence base covers 2020 to 2037, it is acknowledged that if the PfE Plan were to be adopted in 2023, it would provide 14 years' policy post adoption. However, it is considered very likely that when the land supply is updated from its 2020 base date, that sufficient land supply will exist to cover a minimum of 15 years from adoption. Separate to this, Chapter 12 provides an appropriate monitoring framework for a strategic plan of this nature. Paragraph 12.21 makes it clear that this monitoring will be used to determine whether/when any of the policies in PfE need to be updated. It is considered that this approach provides sufficient flexibility	Peel L&P Investments (North) Ltd
	Approach to the use of brownfield land		
PW42	Not enough emphasis has been placed on brownfield sites. These sites should be used before greenfield/Green Belt land is used. Without this approach, the overall plan will result in unsustainable development. A number of specific brownfield sites have been suggested for inclusion in district SHLAAs, including: the old fire and police stations and the old paper mill in Bury; Turner Brothers Factory, Rochdale	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a> . The Plan has also been subject to a full Sustainability Appraisal, full details of which can be found in the <a href="#">Strategic Environmental Assessment</a>	Angela Taylor Louise Mee Jenny Bowring EON Plant Ltd AARD - Action Against Rural Development Carol Birchmore
PW43	The brownfield first policy must be enforced	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet	Susan Hopkinson Kevin Hopkinson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> , the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>	Trustees of the Houghton Concrete Pension Scheme
	Approach to Monitoring		
PW44	The approach to monitoring should not delay local plan preparation. Instead local plans could be used to monitor delivery and determine any necessary changes at the local level	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. Chapter One, paragraph 1.57 makes it clear that the PfE Plan will form part of the development plan for the individual districts. Each district will be responsible for the timetable for producing these plans, separate to the PfE	Barratt Manchester Limited PD Northern Steels
	Evidence base		
PW45	The evidence base documents prepared are inconsistent with each other, they should apply consistent methodologies and be in compliance with national policy. For example, this applies to the preparation of the SHLAAs	No change is considered necessary. The evidence base is rightly wide ranging, given the scope of the PfE Plan. As such the evidence base covers a number of subject areas and therefore different methodologies are applied to different subject areas. However, the same methodology has been applied across the plan area for the same topic area.	Brian Saffer Story Homes Limited Stephen Cluer BDW Trading Ltd Jones Homes (North West) Ltd
PW46	The evidence base documents are not truly independent	No change is considered necessary. It is considered that a proportionate evidence base has been provided by industry expert and professionals to support the policy, it can be found here: <a href="http://greatermanchester-ca.gov.uk">Supporting Documents - Greater Manchester Combined Authority (greatermanchester-ca.gov.uk)</a>	Save Greater Manchester's Green Belt (SGMGB) Rochdale Groups Colin Williams

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW47	The Site Selection process is flawed as it doesn't take account of urban sites and is therefore contrary to the brownfield preference objective of the Plan	No change is considered necessary. The site selection paper <a href="#">[03.04.01]</a> the methodology set out in this paper is that used to identify the sites referred to paragraph 11.5 of the Plan. Therefore, it correctly considers only those sites outside the urban area. The land within the urban area can be found in the Employment Topic Paper <a href="#">[05.01.04]</a> and the housing land supply see Housing Topic Paper <a href="#">[06.01.03]</a> and form the vast majority of the PfE's existing land supply	Stephen Cluer
PW48	There is no attempt to link the 7 no. criteria with the vision or objectives of the PfE Plan or to the Integrated Assessment	<p>The Site Selection Background Paper <a href="#">[03.04.01]</a> details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>The criteria reflect the approach to growth and spatial distribution as set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>. The Options were subject to Integrated Assessment of the Greater Manchester Spatial Framework - Main Report (2020) <a href="#">[02.01.02]</a>.</p> <p>The methodology was reviewed at each stage of the GMSF/PfE plan making process and the Site Selection documentation was updated to reflect any changes, as well as to take account of any new sites.</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology <a href="#">[03.04.08]</a>.</p> <p>The Site Selection process is considered sound and no change is necessary.</p>	Wainhomes (NW) Ltd and Persimmon Homes
PW49	The assessment of sites, including the application of any weighting has been opaque, particularly in relation to constraints such as ecology, flood risk, heritage and Green Belt impact	The Site Selection Background Paper <a href="#">[03.04.01]</a> details the process of assessing sites and identifying those that meet the PfE Vision,	Wainhomes (NW) Ltd and Persimmon Homes

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>Stage 3 of the Site Selection methodology was a planning constraints and site suitability assessment. This was informed by the Integrated Assessment objectives, see para 6.46 of the Site Selection Background Paper and Appendix 6 Site Suitability methodology [03.04.08], including matters such as ecology, flood risk and heritage.</p> <p>A separate Green Belt harm assessment was carried out, which is available within the <a href="#">Greener Places Supporting Documents</a></p> <p>The Site Selection process is considered sound and no change is necessary</p>	
PW50	It is not clear how the matter of deliverability has been applied to the site selection process	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>The matter of deliverability was a matter of consideration separately, taking into account a number of factors such as viability and transport and reported within the relevant allocation topic papers.</p> <p>The Site Selection process is considered sound and no change is necessary</p>	Wainhomes (NW) Ltd and Persimmon Homes
PW51	The seven criteria are not sufficiently justified and appear to include arbitrary thresholds. As a result the Areas of Search are clustered around existing public transport nodes, close to town centres and within or close to wards identified as being the most deprived in England. It is not clear how this relates to the wider challenge of addressing the major housing and economic challenges across the city region	<p>The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts.</p> <p>The Site Selection process is considered sound and no change is necessary</p>	Wainhomes (NW) Ltd and Persimmon Homes
PW52	The Site Selection methodology lacks transparency, no details have been given as to what alternatives were considered, how sites were	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	selected and/or why sites have been rejected. It has therefore not resulted in the most appropriate strategy	release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Reasonable alternatives to the PfE allocations have been considered through the site selection methodology (see Section 6.44 – 6.47 of the <a href="#">Site Selection Background Paper</a> (03.04.01)). The approach to site selection is considered to be robust in the Site Selection Background Paper. No changes to the PfE are considered necessary.	
PW53	The Site Selection methodology is not justified or positively prepared and has resulted in undeliverable allocations being identified	The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts. Evidence demonstrating deliverability, such as viability and transport is contained within the relevant allocation topic papers. The Site Selection process is considered sound and no change is necessary	Peter and Diane Martin Miller Homes PD Northern Steels
PW54	The Site Selection methodology should have had more emphasis on the value of environmental sites. The approach has led to sites being selected which are in conflict with other parts of the plan, particularly the Greener Places Chapter	The Site Selection Background Paper [03.04.01] details the process of assessing sites and identifying those that meet the PfE Vision, Objectives and Spatial Strategy and which meet the housing and employment land needs across the nine districts. 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 allocations are supported by an appropriate evidence base which addresses matters such as those in the representation. The allocations require development of the site to incorporate mitigation as appropriate.	The Wildlife Trusts Alan Sheppard

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		The Site Selection process is considered sound and no change is necessary	
PW55	Site Selection methodology has not been applied correctly because as Wigan can meet 100% of its LHN from within its existing land supply, no Green Belt sites should have been released	Page 14 of the Site Selection Background Paper <a href="#">[03.04.01]</a> details that where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt. This does not mean however that in this circumstance, the district must not release Green Belt. It is therefore considered that the Site Selection process has been applied correctly and no change is necessary	Sam Powell
PW56	Options where no Green Belt land is required to meet the needs of the nine districts should be subject to more detailed review, including increasing density of development on previously developed land. Until this has been done, it is not possible to conclude that all other options have been considered	No change is considered necessary The Growth and Spatial Options Paper <a href="#">[02.01.10]</a> considers reasonable options in terms of both growth and spatial. An assessment of these options has been carried out in what is considered to be an appropriate and consistent manner. The Housing Topic Paper <a href="#">[06.01.03]</a> sets out the work the districts have done in terms of optimising the existing land supply. Notwithstanding this work and the fact that 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, 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.	Stephen Cluer
PW57	Insufficient consideration has been given to the withdrawal of Stockport in terms of its impact on the Growth and Spatial Options	No change is considered necessary. It is considered that the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> gives appropriate consideration to the withdrawal of Stockport	Stephen Cluer
PW58	It is not too early to assess the impact of Covid within the evidence base there are pressing impacts on the regional and national economy	Disagree. 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	Stephen Cluer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a> .	
PW59	The evidence base in relation to ecological habitat loss, biodiversity changes and flood risk is not considered sufficient	It is considered that a proportionate evidence base has been provided in the <a href="#">Greener Places Supporting Documents</a> . Therefore, no change is considered necessary	Helen Lloyd-Higham
PW60	It is considered that there is insufficient evidence to justify the approach to carbon neutrality. Additionally, there appears to be a typographical error in the first bullet point of Objective 7. In other parts of the Plan the ambition for carbon neutrality to be achieved is by 2038, whereas the Objective suggests 2028	It is considered that a proportionate evidence base has been provided in the <a href="#">Sustainable and Resilient Supporting Documents</a> to support the approach to carbon neutrality. There is not a typographical error in Objective 7. It is referring to the target in JP-S2 of achieving carbon neutrality by 2028, as part of our path to achieve a carbon neutral city region by 2038. Therefore, no change is considered necessary	Derwent Group
PW61	Contrary to Plan's statement at paragraph 1.63 as it is based on out of date data as it uses 2014 household data to identify the housing target	No changes necessary. As detailed in <a href="#">the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14)</a> , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology and therefore the 2014-based household projections have been used as the starting point for the assessment of Local Housing Need.	See Appendix
PW62	The average UK household size of 2.46 or 0.4 homes per person should be used to estimate the amount of new homes and land required. The method used in PfE has resulted in far more land being identified, including unnecessary Green Belt release.	No changes necessary. As detailed in <a href="#">the Housing Topic Paper [06.01.03] Chapter 2 (Paragraphs 2.8 to 2.14)</a> , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for. We do not consider that exceptional circumstances exist to justify departure from the standard methodology	

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
PW63	No account is taken of the impact of AI on economic growth	No change is considered necessary. The employment land policies are considered to be consistent with NPPF and provide an appropriate strategy to meet our employment land needs. The employment policies are supported by a proportionate evidence base which is summarised in the Employment Topic Paper <a href="#">[05.01.04]</a>	Peter Thompson

## PfE 2021 Suggested Omissions From the Plan

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
OM1	Omission of reference to the rural economy in the Plan	No change is considered necessary. Places for Jobs establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that it will contribute significantly to economic growth of the of the nine districts. However, the Greener Chapter (chapter 8) does recognise the role that rural areas play across the PfE area, including in terms of the economy.	Zoe Sherlock Mark H Burton Janine Lawford
OM2	The Plan does not include a policy in relation to food production, including opportunities for local farming, market-gardening and allotments	No change is considered necessary. Overall, the Plan establishes an appropriate strategic policy framework to support the long-term economic and housing growth based on the overall Vision and Objectives. It is not envisaged that food production will contribute significantly over the lifetime of the Plan	Peter Thompson
OM3	The Plan omits to include policy wording recognising that the countryside is a working environment in addition to it being a resource for people to enjoy, Natural England has launched a new Countryside Code. Going forward, planning decisions designed to facilitate access to the environment should look to balance the needs of those businesses who are making a living from manging the land and those who wish to use it for recreation etc.	No change is considered necessary. Overall, the Plan establishes an appropriate strategic policy framework to protect the countryside as both a working environment but also as a place for recreation. In particular the policies within the Greener Chapter (chapter 8) provide this framework which would be applied at planning application stage, together with other relevant national and local policy documents. This approach is consistent with NPPF	The National Farmers Union
OM4	The plan as drafted does not explain what will happen if the level of development in the plan does not come forward as expected. The monitoring framework includes generic indicators which will not address the circumstances the PfE Plan seeks to address. Instead the Plan should set out clear triggers for a Plan review and the timescale for review	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans. Additionally, chapters 1, 6 and 7 all make it clear that consideration will be given to the for a formal review outside of the statutory process, if the monitoring results indicate it is necessary	Peel L&P Investments (North) Ltd Home Builders Federation Emery Planning

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
OM5	The Plan should include measures to rectify poor housing delivery in a local authority area. This should include a review of PfE policies, with scope to remove these, if they are judged to be a hindrance to delivery. This will include scope to allow local authorities to suspend the 'brownfield preference' policy if this is necessary to improve delivery.	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.	Home Builders Federation Emery Planning
OM6	The plan fails to include any meaningful mental health impact on the residents	No change is considered necessary. A Health Impact Assessment was carried out as part of the <a href="#">Strategic Environmental Assessment</a> .	Gareth Costello Marie Holder
OM7	The plan does not include enough about the regeneration of Oldham town centre	No change is considered necessary. As detailed in Chapter One, the PfE Plan is strategic spatial plan. It does not cover everything that a district local plan would. This would be a matter for consideration through Oldham's Local Plan	John Higham
OM8	A Grasslands Policy should be included in the Plan. There are significant existing grassland assets (many of which are designated as SBI's) and opportunities for grassland creation across GM. The grassland actions and measures included in the GM LNRS could be used to develop the clauses within this new 'Grassland' policy.	No change is considered necessary. Greener Places is considered to be consistent with NPPF and provides an appropriate strategy for our natural environment, including areas which are SBIs and grasslands	The Wildlife Trusts
OM9	Insufficient reference has been made to the GM Local Nature Recovery Strategy and associated mapping, particularly in Policies JP-G3, JP-G4, JP-G5, JP-G6 and GP-G7	No change is considered necessary. Greener Places, as a whole, is considered to provide an appropriate strategy for our natural environment and to be consistent with NPPF. It is not necessary to reference the GM Local Nature Recovery Strategy in each policy, the plan should be read as a whole	The Wildlife Trusts
OM10	There is no mention of Leigh	No change is considered necessary. As detailed in Chapter One, the PfE Plan is strategic spatial plan. It does not cover everything that a district local plan would. This would be a matter for consideration through Wigan's Local Plan	Irene Thomson
OM11	Chapter 12: The monitoring indicators should include numbering for clarification purposes.	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan	Historic England
OM12	Chapter 12: The indicator "Increase % of buildings on the "at risk register with a strategy for their repair and re-use" should instead read	Disagree, no change is considered necessary. The indicator seeks to increase the number of those buildings, which remain on the at-risk register, with a strategy for repair reduce. It is considered that as	Historic England

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	"Reduce the percentage of buildings on Historic England's "Heritage at Risk register with a strategy for their repair and re-use."	drafted in PfE, the indicator would have a more positive impact on these sorts of buildings	
OM13	Chapter 12: The following monitoring indicator should be included in Chapter 12 "Increase up to date coverage of Historic Environment Record within the Places for Everyone plan area."	No change is considered necessary. The monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan	Historic England
OM14	Chapter 4: Figure 4.6 "Wigan-Bolton Growth Corridor" should accurately reflect the allocation boundaries within the area and should take account of any modifications to the plan	No change is considered necessary. Figure 4.6 is an indicative/illustrative map. As such it is considered that as currently presented it appropriate reflects the proposals in the Wigan-Bolton Growth Corridor. Any changes to proposals in this area made through the Examination process would need to follow due process	Harworth Group
OM15	The plan should include proposals to restore the environment / bio diversity / habitat in and around Boggart Hole Clough	No change is considered necessary. As detailed in Chapter One, the PfE Plan is strategic spatial plan. It does not cover everything that a district local plan would. This would be a matter for consideration through Manchester's Local Plan	Friends Of Boggart Hole Clough
OM16	Places for Homes (7.30) should make reference to brownfield sites in urban areas being transformed into greenspaces and any decision making about developing brownfield sites should take this into account	No change is considered necessary. Paragraph 7.30 appropriately describes the plan's objective to maximise brownfield land development, in line with NPPF. It is not considered to be a soundness issue, therefore no change is proposed.	City of Trees
OM17	Connected Places (10.60), reference should be made to poor street environment / lack of GI which is important for creating social places and encouraging active travel	No change is considered necessary. Chapter Nine, Places for People together with Chapter Ten, Connected Places provide an appropriate strategy for place making and active travel. It is not considered that this is a soundness issue, therefore no change is proposed.	City of Trees
OM18	Connected Places (10.62), reference should be made to streets being greener, as this is an important component in creating more attractive environments for active travel	No change is considered necessary. Chapters Nine, "Places for People" and Ten, "Connected Places" provide an appropriate strategy for place making and active travel. It is not considered that this is a soundness issue, therefore no change is proposed.	City of Trees

## PfE 2021 – Other Issues

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
OI.1	Para 9.20 It is noted in the supporting text that whilst Middlebrook is significant in terms of its size and function, it is not a designated centre and will continue to be treated as out-of-centre. It is not appropriate to include this text and that relating to the Trafford Centre in the PfE. The last sentence of paragraph 9.20 should be removed	It is considered that paragraph 9.20 provides appropriate context for Policy JP-4, in that it correctly clarifies the status of these retail facilities. Therefore, no changes are considered necessary	Orbit Developments (Manchester) Ltd

# Appendix

## Respondents to PfE 2021 Chapter One, Chapter Two and General/Other Responses

Table 1. Row CON2

Given Name	Family Name	On behalf of company/organisation or individual
Elisabeth	Berry	
		Save Crimble Mill Greenbelt Group
Simon	Travis	
David	Brownlow	
Gareth	Costello	
Graham	Walsh	
Paul	Burns	
Trevor	Widdop	
Michelle	Cardno	
Stephen	Lupton	
Carol	Burke	
Trevor	Widdop	
Roy	Dennett	
Stephen	Lupton	
Karen	Cornwall	
Patricia	Hay	
Stephen	Cluer	
Philip	Smith-Lawrence	
Janine	Lawford	
Steven	Higginbottom	
Philip	Smith-Lawrence	
Natasha	Cross	
Alan	Sheppard	
Caroline	Shaw	
Steve	Buck	

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Stephen	Cluer	
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
Steven	Higginbottom	
Alan	Sheppard	
Janet	Taylor	
Donald	Berry	

**Table 2 Row CON2 (cont)**

Given Name	Family Name	On behalf of company/organisation or individual
Gary	West	
Alan	Bayfield	
C	Smith	
Jane	Lester	The Friends of Bury Folk
Juliet	Eastham	
David	Mclaughlin	
Steven	Higginbottom	
		Save Greater Manchester's Green Belt (SGMGB)
Louise	James	
Julie	Halliwell	
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Craig	Smith	
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
Matthew	Broadbent	Save Royton's Greenbelt Community Group
Paul	Kallee-Grover	Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Linda	Newton	
Jeff	Houghton	
Christopher	Russell	
Kathryn	Russell	
Daniel	Lawson	
Edward	Beckmann	
Janet	Brooks	
		Woodford Neighbourhood Forum
Stephen	Cluer	
Jamie	Bentham	
Lucy	Marsden	
Marie	Holder	

**Table 3. Row LP1**

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Helen	Bailey	
Grace	Birchmore	
Lisa	Mather	
Peter	Mather	
Deborah	Morgan	
Andrea	Keeble	
Susan	Higgins	
Oscar	Majid	
Stuart	Johnstone	
Susan	Fleming	
Juliet	Eastham	
Yvonne	Robinson	
Catherine	Schofield	
Andrew	Fleming	
Michelle	Mcloughlin	
Joan	Glynn	
Tom	Wood	
Viv	Barlow	
Jacqueline	Majid	
S	Stratton	
Colin	Heaton	
Hazel	Keane	
John	Robinson	
Susan	Horridge	
Shirley	Buckley	
Barry	Spence	
Joanne	Dawson	
George	Wood	
Joanne	Culliney	
Annmarie	Bennett	

Given Name	Family Name	On behalf of company/organisation or individual
Christopher	Culliney	
Rebecca	Robinson	
Alexandra	Saffer	
Daniel	Robinson	
Derek M	Glynn	
Carole	Martin	
Geoff	Woods	
Carolyn	Saffer	
Samantha	Doggett	
Lucy	Taylor	
Saul	Bennett	
Colleen	Donovan-Togo	
Angela	Shaw	
Paul	Taylor	
Aimee	Shaw	
Jennifer	Cronin	
Barbara	Cooke	
Lorraine	Tucker	
Sheila	Jackson	
Brian	Wright	
Brian	Cooke	
Kelly	Fox	
Paul	Yarwood	
Lisa	Wright	
Sara	Slater	
Abby	Derere	
Craig	Tucker	
Victoria	Hothersall	
Jacqueline	Yarwood	
Adam	Burgess	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Anna Katherine	Burgess	
Alan	Bayfield	
Debbie	Pownceby	
Rebecca	Hindle	
Marjorie	Higham	
Gwynneth	McManus	
Gwyneth	Derere	
Nicola	Kerr	
Julia	Gallagher	
Andy	Skelly	
Joanne	Dallimore	
Alison	Lees	
David J	Arnfield	
Emma	Nye	
Kath	Dobson	
Jackie	Harris Cllr	
Jane	Bennett	
Carl	Mason	
Leanne	Labrow	
Elizabeth	Forrest	
Morris	Homes	
David	Boulger	
Maika	Fleischer	
Suzanne	Nye	
Mat	Burbery	
Alex	Abbey	
Caroline	O'Donnell	
Pamela	Maxon	
Alexandra	Cluer	
Dawn	Johnstone	

Given Name	Family Name	On behalf of company/organisation or individual
Hillary	Rhoden	
Alan	Sheppard	
Robert	Birchmore	
Elisabeth	Berry	
Graham	Walsh	
Roy	Dennett	
Stephen	Cluer	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
Matthew	Broadbent	Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk

Given Name	Family Name	On behalf of company/organisation or individual
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	

**Table 4. Row DTC1**

Given Name	Family Name	On behalf of company/organisation or individual
Helen	Bailey	
Grace	Birchmore	
Lisa	Mather	
Peter	Mather	
Deborah	Morgan	
Andrea	Keeble	
Susan	Higgins	
Oscar	Majid	
Stuart	Johnstone	
Susan	Fleming	
Juliet	Eastham	
Yvonne	Robinson	
Catherine	Schofield	
Andrew	Fleming	
Michelle	Mcloughlin	
Joan	Glynn	
Tom	Wood	
Viv	Barlow	
Jacqueline	Majid	
S	Stratton	
Colin	Heaton	
Hazel	Keane	
John	Robinson	
Susan	Horridge	

Given Name	Family Name	On behalf of company/organisation or individual
Shirley	Buckley	
Barry	Spence	
Joanne	Dawson	
George	Wood	
Joanne	Culliney	
Annmarie	Bennett	
Christopher	Culliney	
Rebecca	Robinson	
Alexandra	Saffer	
Daniel	Robinson	
Derek M	Glynn	
Carole	Martin	
Geoff	Woods	
Carolyn	Saffer	
Samantha	Doggett	
Lucy	Taylor	
Saul	Bennett	
Colleen	Donovan-Togo	
Angela	Shaw	
Paul	Taylor	
Aimee	Shaw	
Jennifer	Cronin	
Barbara	Cooke	
Lorraine	Tucker	
Sheila	Jackson	
Brian	Wright	
Brian	Cooke	
Kelly	Fox	
Paul	Yarwood	
Lisa	Wright	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Sara	Slater	
Abby	Derere	
Craig	Tucker	
Victoria	Hothersall	
Jacqueline	Yarwood	
Adam	Burgess	
Anna Katherine	Burgess	
Alan	Bayfield	
Debbie	Pownceby	
Rebecca	Hindle	
Marjorie	Higham	
Gwynneth	McManus	
Gwyneth	Derere	
Nicola	Kerr	
Julia	Gallagher	
Andy	Skelly	
Joanne	Dallimore	
Alison	Lees	
David J	Arnfield	
Emma	Nye	
Kath	Dobson	
Jane	Bennett	
Carl	Mason	
Leanne	Labrow	
Elizabeth	Forrest	
Maika	Fleischer	
Suzanne	Nye	
Mat	Burbery	
Alex	Abbey	
Doug	Kirkpatrick	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Doug	Kirkpatrick	
Carol	Birchmore	
Caroline	O'Donnell	
Pamela	Maxon	
Alexandra	Cluer	
Dawn	Johnstone	
Susan	Hopkinson	
Kevin	Hopkinson	
Hillary	Rhoden	
Alan	Sheppard	
Tony	Parker	
Ben	Parker	
Leesa	Parker	
Patricia	Deacon	
Helen	Roberts	
Jackie	Harris	
Robert	Birchmore	
Elisabeth	Berry	
PD Northern Steels		
Gareth	Costello	
Graham	Walsh	
Paul	Burns	
David	Boulger	
Jean	Markham	
Roy	Dennett	
Matthew	Oxley	
Stephen	Cluer	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
Matthew	Broadbent	Save Royton's Greenbelt Community Group
Alan	Bayfield	
Paul	Kallee-Grover	Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
C	Smith	
Donald	Berry	
Tom	Hall-Spencer	
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB)
Gary	West	

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
Lucy	Marsden	

**Table 5. Row LEG1**

Given Name	Family Name	On behalf of company/organisation or individual
Helen	Bailey	
Grace	Birchmore	
Lisa	Mather	
Peter	Mather	
Deborah	Morgan	
Andrea	Keeble	
Susan	Higgins	
Oscar	Majid	
Stuart	Johnstone	
Susan	Fleming	
Juliet	Eastham	
Yvonne	Robinson	
Catherine	Schofield	
Andrew	Fleming	
Michelle	Mcloughlin	
Joan	Glynn	
Tom	Wood	
Viv	Barlow	
Jacqueline	Majid	
S	Stratton	
Colin	Heaton	
Hazel	Keane	
John	Robinson	
Susan	Horridge	
Shirley	Buckley	

Given Name	Family Name	On behalf of company/organisation or individual
Barry	Spence	
Joanne	Dawson	
George	Wood	
Joanne	Culliney	
Christopher	Culliney	
Annmarie	Bennett	
Rebecca	Robinson	
Alexandra	Saffer	
Daniel	Robinson	
Derek M	Glynn	
Carole	Martin	
Geoff	Woods	
Carolyn	Saffer	
Samantha	Doggett	
Lucy	Taylor	
Saul	Bennett	
Colleen	Donovan-Togo	
Angela	Shaw	
Paul	Taylor	
Aimee	Shaw	
Jennifer	Cronin	
Barbara	Cooke	
Lorraine	Tucker	
Sheila	Jackson	
Brian	Wright	
Brian	Cooke	
Kelly	Fox	
Paul	Yarwood	
Lisa	Wright	
Sara	Slater	

Given Name	Family Name	On behalf of company/organisation or individual
Abby	Derere	
Craig	Tucker	
Victoria	Hothersall	
Adam	Burgess	
Jacqueline	Yarwood	
Anna Katherine	Burgess	
Alan	Bayfield	
Debbie	Pownceby	
Rebecca	Hindle	
Marjorie	Higham	
Gwynneth	McManus	
Gwyneth	Derere	
Nicola	Kerr	
Julia	Gallagher	
Andy	Skelly	
Joanne	Dallimore	
Alison	Lees	
David J	Arnfield	
Peter	Cooke	
Emma	Nye	
Kath	Dobson	
Patricia	Hay	
David	Boulger	
Jane	Bennett	
Carl	Mason	
Leanne	Labrow	
Elizabeth	Forrest	
Elizabeth	Forrest	
Maika	Fleischer	
Susan	Sollazzi	

Given Name	Family Name	On behalf of company/organisation or individual
Suzanne	Nye	
Mat	Burbery	
Alex	Abbey	
Doug	Kirkpatrick	
Caroline	O'Donnell	
Carol	Birchmore	
M	Walsh	
G R	Walsh	
		Climate Action Bury
Carole	Heed	
Anthony	Heed	
Pamela	Maxon	
Alison	Jackson	
Alexandra	Cluer	
Dawn	Johnstone	
Jason	Robinson	
Katherine	Robinson	
Susan	Hopkinson	
Kevin	Hopkinson	
Elaine	Sharkey	
Michael	Donohoe	
Paul	Cross	
Hillary	Rhoden	
Hillary	Rhoden	
Collette	Gammond	
Alan	Sheppard	
Ian	Hayes	
Tony	Parker	
Ben	Parker	
Leesa	Parker	

Given Name	Family Name	On behalf of company/organisation or individual
Patricia	Deacon	
Helen	Roberts	
Paul	Heywood	
Jackie	Harris	
Robert	Birchmore	
Elisabeth	Berry	
		Save Crimble Mill Greenbelt Group
Philip	Bailey	
David	Brownlow	
Gareth	Costello	
Graham	Walsh	
David	Boulger	
Janine	Richardson	
Carol	Mole	
Julie	Darbyshire	
Jane	Lester	
Natasha	Cross	
Diane	Wright	
Susan	Tunstall	
Roy	Dennett	
Matthew	Oxley	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwel	
Janet	Taylor	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
C	Smith	
Donald	Berry	
Tom	Hall-Spencer	

**Table 6 Row LEG1 (cont)**

Given Name	Family Name	On behalf of company/organisation or individual
Gary	West	
Alan	Bayfield	
Juliet	Eastham	
Matthew	Oxley	
Judith	Sheppard	
Collette	Gammond	

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
Louise	James	
Julie	Halliwell	
Janet	Taylor	
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
Craig	Smith	
Linda	Newton	
		The Friends of Bury Folk
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Christopher	Russell	
Stephen	Cluer	
Kathryn	Russell	
Philip	Smith-Lawrence	
John	Anderson	
Daniel	Lawson	
Clare	Bowdler	
Alan	Bayfield	
		Woodford Neighbourhood Forum
Patricia	Hay	
Christopher	Russell	
Lucy	Marsden	

**Table 7 Row LEG4**

Given Name	Family Name	On behalf of company/organisation or individual
Roy	Dennett	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	

Given Name	Family Name	On behalf of company/organisation or individual
Elizabeth	Forrest	
Susan	Hopkinson	
Kevin	Hopkinson	
Anne	Isherwood	
Alan	Sheppard	
John	Roberts	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Stephen	Cluer	
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	

Given Name	Family Name	On behalf of company/organisation or individual
Donald	Berry	
Helen	Bailey	
Grace	Birchmore	
Elizabeth	Forrest	
Carol	Birchmore	
Hillary	Rhoden	
Tracy	Raftery	
Elisabeth	Berry	
Tom	Hall-Spencer	

**Table 8 Row LEG5**

Given Name	Family Name	On behalf of company/organisation or individual
Lisa	Mather	
Peter	Mather	
Deborah	Morgan	
Andrea	Keeble	
Susan	Higgins	
Oscar	Majid	
Stuart	Johnstone	
Susan	Fleming	
Juliet	Eastham	
Yvonne	Robinson	
Catherine	Schofield	
Andrew	Fleming	
Michelle	Mcloughlin	
Joan	Glynn	

Given Name	Family Name	On behalf of company/organisation or individual
Tom	Wood	
Viv	Barlow	
Jacqueline	Majid	
S	Stratton	
Colin	Heaton	
Hazel	Keane	
John	Robinson	
Susan	Horridge	
Shirley	Buckley	
Barry	Spence	
Joanne	Dawson	
George	Wood	
Joanne	Culliney	
Christopher	Culliney	
Annmarie	Bennett	
Rebecca	Robinson	
Alexandra	Saffer	
Daniel	Robinson	
Derek M	Glynn	
Carole	Martin	
Geoff	Woods	
Carolyn	Saffer	
Samantha	Doggett	
Lucy	Taylor	
Saul	Bennett	
Colleen	Donovan-Togo	
Angela	Shaw	
Paul	Taylor	
Aimee	Shaw	
Jennifer	Cronin	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Barbara	Cooke	
Lorraine	Tucker	
Sheila	Jackson	
Brian	Wright	
Brian	Cooke	
Kelly	Fox	
Paul	Yarwood	
Lisa	Wright	
Sara	Slater	
Abby	Derere	
Craig	Tucker	
Victoria	Hothersall	
Adam	Burgess	
Jacqueline	Yarwood	
Anna Katherine	Burgess	
Alan	Bayfield	
Debbie	Pownceby	
Rebecca	Hindle	
Marjorie	Higham	
Gwynneth	McManus	
Gwyneth	Derere	
Nicola	Kerr	
Julia	Gallagher	
Joanne	Dallimore	
Alison	Lees	
David J	Arnfield	
Emma	Nye	
Kath	Dobson	
David	Boulger	
Leanne	Labrow	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
Alexandra	Cluer	
Catherine	Poulton	
Hilary	Rhoden	
Carol	Birchmore	
Louise	Mee	
Pamela	Maxon	
Dawn	Johnstone	
Iain	Gartside	
Matthew	Broadbent	
Jane	Lester	
David	Mclaughlin	
		Simister Village Community
Mark	Brodigan	
		Save Royton's Greenbelt Community Group

**Table 9 Row PW7**

Given Name	Family Name	On behalf of company/organisation or individual
		AARD - Action Against Rural Development
Helen	Bailey	
Elizabeth	Forrest	
Carol	Birchmore	
Hillary	Rhoden	
Collette	Gammond	
Alan	Sheppard	
John	Roberts	
Maureen	Seward	
Paul	Heywood	
Paul	Burns	
Jim	McMahon	

Given Name	Family Name	On behalf of company/organisation or individual
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Stephen	Cluer	
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	

**Table 10 Row PW7 (cont)**

Given Name	Family Name	On behalf of company/organisation or individual
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Collette	Gammond	

Given Name	Family Name	On behalf of company/organisation or individual
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Stephen	Cluer	
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
Peter	Stratton	
Brian	Saffer	
Donald	Berry	
Tom	Hall-Spencer	
		SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
		Woodford Neighbourhood Forum
		Simister Village Community Association

Given Name	Family Name	On behalf of company/organisation or individual
Lucy	Marsden	

**Table 11 Row PW21**

Given Name	Family Name	On behalf of company/organisation or individual
Stephen	Cluer	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Donald	Berry	
Helen	Bailey	
Grace	Birchmore	
Elizabeth	Forrest	
Carol	Birchmore	
Hillary	Rhoden	
Alan	Sheppard	
Robert	Birchmore	
Elisabeth	Berry	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
Janine	Lawford	
Donald	Berry	
Tom	Hall-Spencer	

**Table 12 Row PW52**

Given Name	Family Name	On behalf of company/organisation or individual
Helen	Bailey	
Grace	Birchmore	
Lisa	Mather	
Elizabeth	Forrest	
Mat	Burbury	
Alex	Abbey	
Hilary	Rhoden	
Doug	Kirkpatrick	
Carol	Birchmore	

Given Name	Family Name	On behalf of company/organisation or individual
Caroline	O'Donnell	
Fran	Greer	
Hillary	Rhoden	
Alan	Sheppard	
Tony	Parker	
Ben	Parker	
Leesa	Parker	
Maureen	Seward	
Patricia	Deacon	
Paul	Heywood	
Robert	Birchmore	
Elisabeth	Berry	
		Trustees of the Houghton Concrete Pension Scheme
John	Anderson	
David J	Arnfield	
Gareth	Costello	
Robert	Birchmore	
Graham	Walsh	
Roy	Dennett	
Stephen	Cluer	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Collette	Gammond	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	

Summary of Issues Raised – Chapter One, Chapter Two and General/Other Responses

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
Gary	West	
Tom	Hall-Spencer	

**Table 13 Row PW52 (cont)**

Given Name	Family Name	On behalf of company/organisation or individual
Gary	West	
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Groups
David	Mclaughlin	
Jane	Lester	
		The Friends of Bury Folk
Judith	Sheppard	
Collette	Gammond	
		Save Greater Manchester's Green Belt (SGMGB)

Louise	James	
Julie	Halliwell	
Janet	Taylor	
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Royton's Greenbelt Community Group
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Craig	Smith	
C	Smith	
Linda	Newton	
Jeff	Houghton	
Christopher	Russell	
Stephen	Cluer	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
John	Anderson	
Daniel	Lawson	
Mark	Brodigan	
Lucy	Marsden	

**Table 14 Row PW61**

Given Name	Family Name	On behalf of company/organisation or individual
Helen	Bailey	
Grace	Birchmore	
Elizabeth	Forrest	
Carol	Birchmore	
Hillary	Rhoden	
Collette	Gammond	

Given Name	Family Name	On behalf of company/organisation or individual
Alan	Sheppard	
John	Roberts	
Maureen	Seward	
Paul	Heywood	
Jackie	Harris	
Liam	Dean	
Gareth	Costello	
Heather	Williams	
Stephen	Cluer	
Philip	Smith-Lawrence	
Janine	Lawford	
Natasha	Cross	
Steve	Buck	
Adrian	Bolton	
Judith	Sheppard	
Louise	James	
Julie	Halliwell	
Janet	Taylor	
Daniel	Lawson	
		Save Greater Manchester's Green Belt (SGMGB)
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
		Save Royton's Greenbelt Community Group
Alan	Bayfield	
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
Jeff	Houghton	
Craig	Smith	
C	Smith	

Given Name	Family Name	On behalf of company/organisation or individual
Linda	Newton	
		The Friends of Bury Folk
Christopher	Russell	
Kathryn	Russell	
Philip	Smith-Lawrence	
Juliet	Eastham	
Donald	Berry	

**Table 15 Row PW61 (cont)**

Given Name	Family Name	On behalf of company/organisation or individual
Louise	James	
Judith	Sheppard	
Collette	Gammond	
		Save Greater Manchester's Green Belt (SGMGB)
Janet	Taylor	
		Save Greater Manchester's Green Belt (SGMGB) Oldham Groups
		Save Greater Manchester's Green Belt (SGMGB) Bury Groups
Matthew	Oxley	
Gary	West	
Craig	Smith	
		Save Royton's Greenbelt Community Group
		Save Greater Manchester's Green Belt (SGMGB) Save Apethorn and Bowlacre
C	Smith	
Linda	Newton	
		The Friends of Bury Folk
Jeff	Houghton	
Christopher	Russell	
Stephen	Cluer	
Kathryn	Russell	

Given Name	Family Name	On behalf of company/organisation or individual
Philip	Smith-Lawrence	
Juliet	Eastham	
Matthew	Oxley	
Daniel	Lawson	
Christopher	Russell	
Alan	Bayfield	
Gary	West	
		Save Greater Manchester's Green Belt (SGMGB)
C	Smith	
Philip	Smith-Lawrence	