

PfE Response to IN21 Action Points from week 4 hearing sessions

Updated schedule of proposed main modifications

AP39. Following publication of their response to this note, GMCA should prepare an updated comprehensive schedule of proposed main modifications to replace that published on 16 November 2022 [PMM2.1]. The updated schedule should include all of the main modifications in PMM2.1 (unless superseded by subsequent modifications or otherwise specified by us in an Action Point) along with those proposed in response to the Action Points set out in this note and previous notes following the earlier hearing sessions [IN17 and IN19].

*The updated schedule of proposed main modifications in response to AP39 should be submitted to the Programme Officers by **midday on Monday 16 January 2023**.*

PfE Response

- 1.1 An updated, comprehensive schedule of proposed main modifications, to replace that published on 16 November 2022 [PMM2.1], will be submitted to the Programme Officers 16th January 2023.

M9. Greener Places

JP-G1 Valuing Important Landscapes

AP40. GMCA to consider whether the proposed policy title change to “Landscape Character Areas” and the other proposed main modifications to “Landscape Character Types” in GMCA18 are consistent and, if not, whether any further modifications would be needed to be achieve this. Subject to the conclusion, the proposed modifications relating to JP-G1 in GMCA18 should be included in the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.2 The Greater Manchester Spatial Framework Landscape Character and Sensitivity Assessment (GMLCSA) (2018) ([07.01.06](#)) defines a framework of ten Landscape Character Types (LCTs). These LCTs are shown on Figure 8.1, and will be shown on the Policies Map as part of the proposed modification.
- 1.3 The GMLCSA additionally identifies 46 component Landscape Character Areas (LCAs). Table 4.1 of the GMLCSA shows which Landscape Character Areas fall within which LCTs. Some Landscape Character Areas fall within more than on LCT.

- 1.4 The purpose of the modification to the name of Policy JP-G1 set out in PMM2.1 is to ensure clarity of interpretation and avoid ambiguity from the original name of the policy 'Valuing Important Landscapes', as it is acknowledged that these landscapes are not all valued in so far as paragraph 174(a) of the NPPF is concerned.
- 1.5 It is considered that the wording of the policy is sufficient to draw the reader to the GMLCSA and the associated LCT and Landscape Character Area definitions contained therein, however, in order to improve clarity of this modification and ensure consistency with the GMLCSA, acknowledging that Landscape Character Types and Landscape Character Areas are two different things in the GMLCSA, the proposed modification to Policy JP-G1 set out in PMM2.1 will be modified as below:

Modify Policy JP-G1 name as follows:

~~Valuing Important Landscapes~~ Landscape Character

- 1.6 The proposed modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G2 Green Infrastructure Network

AP41. The proposed modification from GMCA18 to move paragraph 3 from JP-G2 including the bulleted list (a-m) to the reasoned justification, should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.7 The proposed modification from GMCA18 to move paragraph 3 from JP-G2 including the bulleted list (a-m) to the reasoned justification, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP42. GMCA to provide further explanation for Green Infrastructure Opportunity Areas and consider whether additional main modifications are needed in addition to those proposed in GMCA18 which moves paragraph 3 to the reasoned justification and deletes text from paragraph 5. GMCA to also clarify whether all the relevant allocations do include measures relating to the Green Infrastructure Opportunity Areas.

PfE Response

- 1.8 The Green Infrastructure Opportunity Areas identified by the Greater Manchester Ecological Unit (GMEU) relate to opportunity areas and sites for the creation and improvement of biodiversity habitats and have been identified as having particular potential for delivering improvements to our Green Infrastructure Network (as stated in the proposed modification in

PMM2.1 to move paragraph 3 of Policy JP-G2 to the reasoned justification after paragraph 8.15). These areas and sites are also locations for green infrastructure improvement, in general, as habitat creation and enhancement inevitably benefits a range of ecosystem services.

- 1.9 The Opportunity Areas and sites have been chosen because they are of a strategic scale and capable of delivering strategic-scale improvements to the delivery of ecosystem services for large areas of Greater Manchester. The areas are not necessarily constraints on built development as the development of grey infrastructure and built development within opportunity areas may facilitate the delivery of improvements in some areas.
- 1.10 These Opportunity Areas are acknowledged to be broad however link directly to the Green Infrastructure Network as covered by Policy JP-G2 and shown in Figure 8.1.
- 1.11 Allocation policies themselves do not specifically reference Green Infrastructure Opportunity Areas, however ways in which to deliver major green infrastructure improvements within and around the Green Infrastructure Network have been included. Further, Policy JP-G2 requires development within and around the Green Infrastructure Network to be consistent with delivering major green infrastructure improvements within them and requires contribution to improvements.
- 1.12 After consideration of the above, additional main modifications are proposed to those in GMCA18 to further tighten the wording of the changes and provide clarity, particularly in relation to Opportunity Areas not being a constraint on development and the relationship between Opportunity Areas and the Green Infrastructure Network:

Modify Policy JP-G2 as PMM2.1 to move paragraph 3 (including bulleted list a-m) to reasoned justification after paragraph 8.15 and insert new paragraphs (moved and amended from Policy JP-G2 paragraph 4 as below):

These Green Infrastructure Opportunity Areas have been chosen because they are of a strategic scale and capable of delivering strategic-scale improvements to the delivery of ecosystem services for large areas of Greater Manchester. The areas are not constraints on development and the development of grey infrastructure and built development within opportunity areas may facilitate the delivery of improvements in some areas.

Where these Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations in this plan, appropriate measures to achieve the delivery of major green infrastructure improvements within and around the Green Infrastructure Network have been included within Policy JP-G2 and the delivery of green infrastructure improvements in accordance with the policy should also have regard to these opportunity areas.

- 1.13 The proposed modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP43. GMCA to consider whether the policy should provide further detail on the role of Local Nature Recovery Strategies and if so, propose main modifications accordingly.

PfE Response

- 1.14 Paragraph 8.10 – 8.15 of the plan as published provide detail on the development of a Nature Recovery Network (NRN) for Greater Manchester and details the role and production of the pilot Local Nature Recovery Strategy (LNRS). As set out in the examination, the LNRS for Greater Manchester is still in development and is likely to be completed towards the end of 2023 / early 2024.
- 1.15 Policy JP-G2 sets out that the development of a green infrastructure network and improvements sought to the network via the policy will contribute to the development of a nature recovery network for Greater Manchester. Whilst the reasoned justification to Policy JP-G2 provides some detail on the role of the LNRS / Nature Recovery Network, a further modification to paragraph 2 of Policy JP-G2 is proposed as follows to provide further clarity on the role of LNRS's:

The protection, management and enhancement of Green Infrastructure will contribute to the development of a Local Nature Recovery Network Strategy for Greater Manchester. This Strategy will feed into the development of a Nature Recovery Network locally and nationally.

- 1.16 The proposed modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP44. GMCA to amend the proposed main modifications in PMM2.1 (page 27) to be consistent with the requirements of the final sentence of paragraph 142 of the National Planning Policy Framework in respect of compensatory improvements to environmental quality and accessibility.

PfE Response

- 1.17 The proposed main modifications in PMM2.1 (page 27) will be amended as follows, to be consistent with the requirements of the final sentence of paragraph 142 of the National Planning Policy Framework in respect of compensatory improvements to environmental quality and accessibility:

Development which involves the removal of land from the Green Belt (including allocations proposed in this plan) will be required to offset the impact of removing land from the Green Belt through identifying and delivering compensatory improvements to the environmental

quality and accessibility of ~~contribute towards green infrastructure~~
enhancement opportunities in the remaining Green Belt in the vicinity
of the site. Details of specific sites and projects will be established in
discussion with the relevant Local Authority.

- 1.18 This amended main modification will be reflected in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP45. GMCA to provide detail on how each allocation would be expected to deliver compensatory improvements in line with the above modifications (where the site is to be removed from the Green Belt).

PfE Response

- 1.19 In responding to the Inspectors Matters, Issues and Questions relating to allocations (IN10), the GMCA have set out (where relevant and the site is to be removed from the Green Belt) how the allocation policies would be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing land in accordance with paragraph 142 of the NPPF.
- 1.20 As set out in the proposed modifications to Policy JP-G2 (above) allocations would be expected to identify and deliver compensatory improvements to the environmental quality and accessibility of the remaining Green Belt in the vicinity of the site and should identify and establish details of specific sites and projects in discussion with the relevant Local Authority. It is envisaged that this work would be identified and delivered as part of and alongside masterplanning work and proposed green infrastructure / landscaping schemes and could be secured through developer contributions if these enhancements are outside the red line boundary of a planning application.
- 1.21 It should be noted that where site allocations retain Green Belt within their site boundary, measures to identify and deliver compensatory improvements to the remaining Green Belt in the vicinity of the site to offset the impact of removing land from the Green Belt may be delivered on-site.

AP46. The proposed modification from GMCA18 to delete from paragraph 5 the words “in accordance with the above priorities” should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.22 The proposed modification from GMCA18 to delete from paragraph 5 the words “in accordance with the above priorities”, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP47. The proposed modification from GMCA18 (page 3) to insert after paragraph 8.15 four new paragraphs of reasoned justification relating to standards (as a consequence of the proposed deletion of policy JP-G8) should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.23 The proposed modification from GMCA18 (page 3) to insert after paragraph 8.15 four new paragraphs of reasoned justification relating to standards (as a consequence of the proposed deletion of policy JP-G8), will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

Policies JP-G3 to JP-G5

AP48. GMCA to provide further explanation for “other associated activities” referred to in policies JP-G3 to JP-G5 and if modifications are necessary, these should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.24 As set out in the GMCA’s response (GMCA5.1) to the Inspectors Preliminary Questions on Thematic Policies (IN6), the phrase ‘other associated activities’ is designed to capture the full range of activities related to achieving the wider outcomes of policies JP-G3 – JP-G5 (and also JP-G7).
- 1.25 The phrase is designed to acknowledge that the determination of planning applications alone will not achieve these outcomes and the carrying out of other activities, for example the development of a Local Nature Recovery Strategy and related district level strategies and plans, will also help to achieve the desired outcomes from the policies.
- 1.26 Other associated activities may also include ongoing efforts to protect, improve and restore the components of the Green Infrastructure Network via various strategies and directives that may be developed outside of the planning process. As the range of other associated activities and projects that could deliver the priorities of these policies is vast, it is not possible to provide an exact definition however the use of the term as proposed in the policies is considered to be a sufficient ‘catch-all’ to demonstrate how the priorities of these policies are expected to be delivered.

JP-G3 River valleys and waterways

AP49. GMCA to prepare a main modification to part 8 policy JP-G3 that refers to increasing the use of canals for active travel “where compatible with commercial freight use on the Manchester Ship Canal” (or similar).

PfE Response

- 1.27 Modify part 8 of Policy JP-G3 to read:

8. Where compatible with the requirements of commercial and freight use, increase the use of canals and watercourses for active travel, with improved and extended rights of way alongside the water providing walking and cycling routes for both recreation and commuting, thereby increasing access to natural green space; and

- 1.28 The proposed modification is proposed to provide certainty and clarity that there should be no conflict between the ongoing commercial and freight requirements of canals (particularly the Manchester Ship Canal) with the requirements of the policy. The modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G4 Lowland Wetlands and Mosslands

AP50. The proposed modification from GMCA18 relating to paragraph 1 to refer to Fig 8.1 and mosslands and lowland farmland landscape character type should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.29 The proposed modification from GMCA18, relating to paragraph 1 to refer to Fig 8.1 and mosslands and lowland farmland landscape character type, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G5 Uplands

AP51. The proposed modification from GMCA18 relating to paragraph 1 to refer to Fig 8.1 and open moorlands and enclosed upland fringes landscape character type should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.30 The proposed modification from GMCA18, relating to paragraph 1 to refer to Fig 8.1 and open moorlands and enclosed upland fringes landscape character type, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G6 Urban Greenspace

AP52. The proposed modification from GMCA18 to delete “in accordance with accessibility standards” from paragraph 1 bullet 2 should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.31 The proposed modification from GMCA18, to delete “in accordance with accessibility standards” from paragraph 1 bullet 2, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G7 Trees and Woodlands

AP53. GMCA to clarify which elements of JP-G7 are relevant to local plans and development management and what the implications are for development, and to prepare modifications accordingly.

PfE Response

- 1.32 Parts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 are intended to be relevant to local plans and provide direction to local authorities in the development of district level planning policies and strategies.
- 1.33 Parts 12 and 13 of Policy JP-G7 are relevant to development management and relate to tree-planting and the protection of trees during construction. The implications for development resulting from these criteria are a specific requirement to contribute towards significantly increasing tree planting within the plan area and where development results in the loss of trees, requiring a scheme for replacement (with a preference for on-site) of two new trees for each tree lost. Part 13 also places a requirement on development to protect trees and woodland during construction.
- 1.34 In order to clarify this, it is proposed to modify Policy JP-G7 as follows:

Policy JP-G 7
Trees and Woodland

~~In making planning decisions and carrying out other associated activities,~~
We will work to deliver the aims and objectives of the Greater Manchester Tree and Woodland Strategy, aiming to significantly increase tree cover, protect and enhance woodland, and connect people to the trees and woodland around them, including by:

This will be done through local planning and associated activities such as:
1. Protecting and expanding the mosaic of woodland habitats, linking fragmented areas of woodland, in particular wooded cloughs and pockets of ancient and riverside (riparian) woodland;

2. Encourageing habitat diversity through conserving and managing existing woodland and trees that are of heritage, cultural and/or aesthetic value, including ancient woodland and veteran trees;
3. Aiming to plant a tree for every resident in the plan area over the next 25 years as part of the City of Trees initiative;
4. Targeting tree-planting at the areas of greatest need where the green infrastructure benefits can be maximised, whilst avoiding the loss of, or harm to, other priority habitats, including encouraging woodland planting schemes on areas of low grade agricultural land and land in need of remediation;
5. Establishing a new City Forest Park in Salford, Bolton and Bury, which will provide a vast urban forest close to the City Centre;
6. Considerably increasing the provision of street trees within urban areas;
7. Promoting the provision of community orchards to increase fruit consumption;
8. Promoting the opportunity for woodland conservation to raise awareness for the sustainable use of timber;
9. Securing a diversification of broadleaved species, in order to increase biodiversity and disease resilience;
10. Improving public access to woodland and trees particularly by sustainable travel models to capture the health and wellbeing benefits whilst managing the associated pressures;
11. Encouraging the positive management of woodland to bring it into a more productive state, improve habitat diversity, and more effectively contribute to important green infrastructure functions such as flood risk management, urban cooling and carbon storage/sequestration;

And through development as follows:

12. Where development would result in the loss of existing trees, requiring replacement on the basis of two new trees for each tree lost, with a preference for on-site provision; and
13. Protecting trees and woodland during the construction phase of development.

JP-G8 Standards for Greener Places

AP54. The proposed modification from GMCA18 to delete policy JP-G8 should be added to the updated schedule of proposed main modifications to replace PMM2.1.

Consequential modifications to JP-G2 are referred to above.

PfE Response

- 1.35 The proposed modification from GMCA18 to delete policy JP-G8 (together with the consequential modifications to JP-G2) will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G9 A Net Enhancement of Biodiversity and Geodiversity

AP55. The proposed modifications from GMCA18 in respect of modifying paragraphs 1, 2a, 2c and reasoned justification paragraph 8.53, and deleting 2e and the last paragraph should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

1.36 The proposed modification from GMCA18 in respect of modifying paragraphs 1, 2a, 2c and reasoned justification paragraph 8.53, and deleting 2e and the last paragraph will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP56. GMCA to clarify which elements of JP-G9 are relevant to local plans and development management and to prepare modifications accordingly.

PfE Response

1.37 Parts 1-7 of the policy are intended to be relevant to local plans and provide direction to local authorities in the development of district level planning policies and strategies.

1.38 The second part of Policy JP-G9, starting ‘development will be expected to...’ is relevant to development management and clearly sets out an expectation that development follows the biodiversity net gain mitigation hierarchy.

1.39 Given the second part of the policy, it is considered clear which elements of JP-G9 are relevant to development management. However, it is considered that it would be helpful to provide clarification in terms of parts 1-7 to remove ambiguity, as follows:

Policy JP-G9 (first sentence)

~~Across the plan as a whole,~~ Through local planning and associated activities a net enhancement of biodiversity resources will be sought, including where relevant by:...

AP57. GMCA to consider whether part c of the policy or paragraph 8.52 which refers to (“recognised metric”) should refer to the DEFRA metric and to prepare modifications accordingly.

PfE Response

1.40 Modify Paragraph 8.52 to read:

If our overall aims of a major net enhancement of biodiversity value and improved access to nature are to be achieved then all new development will have to play its part, each delivering a net gain in biodiversity. This could involve the protection and improvement of existing habitats, the creation of new ones, and/or the strengthening of connections between them. The Defra metric (DEFRA 3.0 or later)

~~Recognised metrics~~ will be applied to new development proposals to calculate and demonstrate a measurable net gain in biodiversity of no less than 10%.

- 1.41 The proposed modification is proposed to provide clarity and ensure the reader is directed to the correct metric. The modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP58. The modification proposed in GMCA18 to delete (e) and add text to reasoned justification in paragraph 8.53 should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.42 The proposed modification from GMCA18 to delete (e) and add text to reasoned justification in paragraph 8.53 will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP59. GMCA to prepare a main modification to amend Part a(i) to reflect the wording of national policy (paragraph 180(a) of the Framework).

PfE Response

- 1.43 Modify part a(i) of Policy JP-G9 to read:

Avoiding significant harm to biodiversity, particularly where it is irreplaceable, ~~and including through~~ consideration of alternative sites with less harmful impacts ~~where appropriate~~, then

- 1.44 The proposed modification is proposed to reflect the wording of national policy paragraph 180(a) and will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G10 Green Belt

AP60. GMCA to prepare a main modification to the first paragraph of policy JP-G10 to read “The Green Belt is defined on the policies map and illustrated on Figure 8.6. The Green Belt serves the five purposes ...” (or similar).

PfE Response

- 1.45 A main modification is proposed to the first paragraph of policy JP-G10 to read:

The Green Belt ~~is~~ as defined on the Policies Map and illustrated on Figure 8.6 ~~will be afforded strong protection in accordance with the~~

~~National Planning Policy Framework. The Green Belt as shown in Figure 8.6 'The Green Belt 2021' will continue to be managed positively to serve the five purposes set out in national policy:...~~

- 1.46 This modification is proposed to ensure consistency and provide clear wording that cannot be misinterpreted. The modification will be added to the updated schedule of proposed main modifications to replace PMM2.1.

AP61. The modification proposed in GMCA18 to delete the last paragraph of policy JP-G10 relating to the allocations should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.47 The proposed modification from GMCA18 to delete the last paragraph of policy JP-G10 relating to the allocations will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-G11 Safeguarded Land

AP62. The modification proposed in GMCA18 to delete JP-G11 should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.48 The proposed modification from GMCA18 to delete JP-G11 will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP63. GMCA to prepare any necessary consequential main modifications to policy JPA3.2 Timperley Wedge at paragraphs 47-50.

PfE Response

- 1.49 Modify criteria and section named 'Safeguarded Land – HS2 Growth Area' in Policy JP Allocation 3.2 to read:

The land identified to the south and west of the proposed HS2 Airport station as shown on the Allocation Policy Plan, although removed from the Green Belt, it is safeguarded and is not allocated for development at this present time;

Development on this land will only be permitted where it would:

- Be acceptable were it in the Green Belt; and
- Not prejudice the future use of the land.

~~The land is safeguarded in accordance with Policy JP-G11 'Safeguarded Land';~~

Any future allocation is subject to an assessment that the land directly contributes to the Greater Manchester HS2 / NPR Growth Strategy (as maybe updated or superseded) and it should only be developed after completion of the development set out in the Timperley Wedge ~~m~~Masterplan/SPD and following the delivery of the proposed HS2 Airport station; and

Should a the proposed HS2 Airport station not be developed, the land will return to Green Belt subject to an exceptional circumstances' case review following a future Plan review.

- 1.50 The proposed modification to Policy JP Allocation 3.2 is proposed to ensure consistency with other policies in the Plan and will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

M10. Places for People

JP-Strat-12 Main Town Centres

AP64. The modification proposed in GMCA19 to JP-Strat12 and paragraphs 4.74 and 4.77 regarding Salford Quays town centre should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.51 The proposed modification from GMCA19 to JP-Strat12 and paragraphs 4.74 and 4.77 regarding Salford Quays town centre will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

- 1.52 The proposed main modification to the 4th paragraph of Policy JP-Strat12 will be as follows:

~~“A new town centre is proposed for designation at Salford Quays in the Publication Draft Salford Local Plan: Development Management Policies and Designations. Should that designation become part of Salford's Adopted Local Plan, development in that location will be subject to this policy.”~~

- 1.53 The proposed main modification to the reasoned justification at paragraphs 4.74 and 4.77 will be as follows:

“4.74 We have ~~seven~~ eight main town centres: Altrincham, Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale, Salford Quays¹ and Wigan. They are immensely important to their host districts, and Greater Manchester as a whole, as a source of local identity and pride, the prime location for shops and services, and a major supply of

¹ This is contingent on Salford Quays being identified as a main town centre in Salford's Local Plan once it is adopted (adoption anticipated in January 2023)

employment and leisure opportunities. They are complemented by a diverse collection of smaller town centres and local centres across the nine districts.“

“4.77 The main town centres offer the opportunity to provide a more affordable alternative to the City Centre ~~and the Quays~~, both for businesses to locate and skilled workers to live, whilst providing excellent access to services and facilities. The public transport corridors into the main town centres will also have an important function, especially as a location for new housing, further increasing the number of people with easy access to town centre facilities by sustainable modes of transport.”

JP-P1 Sustainable Places

AP65. The modification proposed in GMCA19 to criterion 4 and criterion 8 and moving paragraphs 5.24-5.28 from Chapter 5 to Chapter 9 after paragraph 9.9 should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

1.54 The proposed modification from GMCA19 to criterion 4 and criterion 8 and moving paragraphs 5.24-5.28 from Chapter 5 to Chapter 9 after paragraph 9.9 will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

1.55 The proposed main modifications to Policy JP-P1 criterion 4 and 8 are as follows:

“4. Resilient, capable of dealing with major environmental ~~and economic~~ events”

“8. Safe, including by designing out crime and terrorism, ~~and reducing opportunities for anti-social behaviour~~ and by ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster.”

1.56 The proposed main modifications to the reasoned justification, by moving paragraphs 5.24-5.28 and inserting after paragraph 9.9, will be as follows:

“5.24 Greater Manchester aims to be one of the most resilient places in the world.

5.25 A key part of achieving sustainable development is ensuring resilience, making sure that our places maintain capacity to function, so that the people living and working here survive and thrive no matter what stresses or shocks they encounter. A significant challenge within this is the ability to respond to future impacts from climate change.

- 5.26 Greater Manchester is part of the Rockefeller Foundation's 100 Resilient Cities programme (100RC)², which aims to help cities become more resilient to potential challenges. Greater Manchester has produced a Resilience Strategy as part of this programme. The ten districts have also signed up to the United Nations' Making Cities Resilient Campaign, which aims to reduce disaster risk.
- 5.27 The need to plan to reduce chronic stresses as well as minimise the impact of acute shocks means that planning for resilience has to be all-embracing, and so many elements of this plan have a role to play.
- 5.28 The Greater Manchester Community Risk Register³ and work under the 100RC programme identify that river and surface water flooding, hazardous materials accidents, terrorism, and disease outbreaks are some of the most significant resilience challenges faced. The way in which Greater Manchester develops will have a significant impact on future levels of risk and vulnerability, and the ability of people and places to recover from acute shocks."

AP66. GMCA to consider whether Criterion 13 (hazardous installations) from JP-S4 should be added to policy JP-P1 or another policy and propose modifications accordingly.

PfE Response

- 1.57 As set out in in our response to IN19 AP22 pages 39-40, in order to avoid duplication of legislation, national planning policy and national planning guidance in line with NPPF para 16, incorporating Policy JP-S 4 Criterion 13 into Policy JP-D1 is considered unnecessary. For this same reason, it is not considered necessary to include Criterion 13 within Policy JP-P1 and as such it is to be deleted from the Plan.

JP-P2 Heritage

AP67. Delete "Through this Plan" in first sentence of policy JP-P2.

PfE Response

- 1.58 The words "Through this Plan" in first sentence of policy JP-P2 will be deleted to provide clarity and ensure consistency across the Plan.
- 1.59 The proposed main modification to the first sentence of Policy JP-P2 will be as follows:

² <https://www.rockefellerfoundation.org/100-resilient-cities/>

³ <https://www.gmemergencyplanning.org.uk/risks/how-we-assess-risk/community-risk-register/>

~~“Through this Plan w~~ We will proactively manage and work with partners to positively conserve, sustain and enhance its historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment,....”

AP68. Amend the proposed modification at GMCA 10.6 (H) to criterion 2 in second paragraph of policy JP-P2 to read: “Ensuring that the heritage significance of a site or area is considered in accordance with national policy in the planning and design process and opportunities for interpretation and local engagement are optimised” or similar.

PfE Response

1.60 Further to the proposed modification set out at GMCA 10.6 (H) to criterion 2 in the second paragraph of Policy JP-P2, in line with the Inspectors suggestion, the proposed main modification to Criteria 2 will ensure consistency with national planning policy and be as follows:

“2. ~~Utilising~~ Ensuring that the heritage significance of a site or area is considered in accordance with national planning policy effectively in the planning and design process, ~~providing and~~ opportunities for interpretation and local engagement are optimised,”

AP69. Delete the fourth and fifth paragraphs of policy JP-P2 and insert “Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy” (or similar).

PfE Response

1.61 A proposed main modification to delete to the fourth and fifth paragraphs (including any previous proposed modifications) of Policy JP-P2 and replace, in line with the Inspectors suggestion, “Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy”, in order to improve clarity and consistency with national policy. The proposed modification is as follows:

“.....historic value.

~~Development proposals affecting a designated heritage asset (or an archaeological site of national importance), and a including conservation area(s) should conserve those elements which contribute to its significance including those identified in any conservation area appraisal as making a positive contribution to the area. Harm to such elements will only be permitted where this is clearly justified and outweighed by the public benefits of the proposal.~~

~~Development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through~~

~~design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of unnon-designated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets. Development proposals will also be expected to avoid harm to other non-designated heritage assets.~~

Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.

Where heritage assets have been identified as being....”

JP-P3 Cultural Facilities

AP70. Amend the proposed modification to paragraph 9.15 as set out in PPM2.1 to delete the words “and be consistent with the appropriate local planning framework”.

PfE Response

1.62 The proposed modification to paragraph 9.15, as set out in PPM2.1, will be amended to delete the words “and be consistent with the appropriate local planning framework” to ensure that flexibility and responsive support measures can be readily identified to creative industries, as appropriate.

1.63 The proposed main modification to the reasoned justification at paragraph 9.15 will be as follows:

“9.15 The continued enhancement of cultural opportunities is central to place-making across Greater Manchester. The importance of culture and the night time economy will need to be reflected in the way in which our cities, towns and neighbourhoods develop, with individual developments contributing towards this. Creative Improvement Districts form part of Greater Manchester’s cultural and economic response to the pandemic, as set out in the GM Culture Recovery Plan, to support the recovery of high streets across Greater Manchester’s town centres. They will be delivered as part of culture, night time economy and creative-led regeneration programmes ~~and be consistent with the appropriate local planning framework.~~”

AP71. Delete “Through this Plan” in first sentence of JP-P3.

PfE Response

1.64 The words “Through this Plan” in first sentence of policy JP-P3 will be deleted to provide clarity and ensure consistency across the Plan.

- 1.65 This modification will be added to the updated schedule of proposed main modifications to replace PMM2.1. A proposed main modification to the first sentence of Policy JP-P3 is proposed as follows:

~~“Through this Plan w~~ We will proactively develop and support cultural businesses and attractions in our cities and towns through a range of measures including:”

AP72. The modification proposed in GMCA19 to insert “where appropriate” in JP-P3 to be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.66 The proposed modification from GMCA19 to insert “where appropriate” in JP-P3 will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023. The proposed main modification is as follows:

“....through a range of measures, where appropriate, including:”

JP-P4 New retail and leisure uses in Town Centres

AP73. The modification proposed in GMCA19 for criterion B and the last paragraph of JP- P4 relating to Salford Quays town centre, should be added to the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.67 The proposed modification from GMCA19 for criterion B and the last paragraph of JP- P4, relating to Salford Quays town centre, will be added to the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.
- 1.68 The proposed main modification, as initially set out in GMCA 19, to criterion B and the last paragraph of Policy JP-P4 is as follows:

“B. Main town centres:

1. Altrincham (Trafford)
2. Ashton-under-Lyne (Tameside)
3. Bolton (Bolton)
4. Bury (Bury)
5. Oldham (Oldham)
6. Rochdale (Rochdale)
7. Salford Quays (Salford) ⁴

⁴This is contingent on Salford Quays being identified as a main town centre in Salford's Local Plan once it is adopted (adoption anticipated in January 2023)

8. Wigan (Wigan) ”

~~“A new town centre is proposed for designation at Salford Quays in the Publication Draft Salford Local Plan: Development Management Policies and Designations. Should this designation become part of the Salford Local Plan, Salford Quays will be classed as a Main Town Centre for the purposes of this policy.”~~

AP74. GMCA to clarify whether the opening sentence of policy JP-P4 that refers to the existing hierarchy being maintained and enhanced is consistent with the last sentence of proposed main modification on page 34 of PMM2.1 which refers to expansion and provision of new centres, and to propose further main modifications if necessary.

PfE Response

- 1.69 To provide clarity and consistency between the opening sentence of Policy JP-P4 that refers to the existing hierarchy being maintained and enhanced and the last sentence of proposed main modification on page 34 of PMM2.1 which refers to expansion and provision of new centres, a further main modification to the opening sentence of Policy JP-P4 is proposed as follows:

~~“The existing upper levels of the hierarchy of centres for retail and leisure uses will be maintained and enhanced. These upper levels of the hierarchy of centres are:”~~

- 1.70 The word ‘existing’ is proposed to be removed to reflect the addition of Salford Quays as a new town centre in the upper levels of the hierarchy. The opening sentence seeks to clarify the upper level of the hierarchy of centres while of proposed main modification on page 34 of PMM2.1 refers to the boundary of these centres, and for level the lower levels of the hierarchy of centres and their boundaries, to be identified through local plans.

JP-P6 Health

AP75. GMCA to clarify what will be used as the threshold for the requirement for a Health Impact Assessment and to propose main modifications to policy JP-J6 and the reasoned justification accordingly.

PfE Response

- 1.71 To provide clarity on the threshold for the requirement for a Health Impact Assessment a main modification is proposed to Policy JP-J6 and the reasoned justification at paragraph 9.33 accordingly. These modifications are as follows:

“C. Be supported by a Health Impact Assessment for all developments which require to be screened for an Environmental Impact Assessment, and”

“9.33 The submission of Health Impact Assessments for development proposals will help ensure that the effects of development on both health and wellbeing are considered and responded to during the planning process. Health Impact Assessments should aim to enhance the potential positive aspects of a proposal while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that may be affected. ~~It is expected that Health Impact Assessments are undertaken in support of all developments which require an Environmental Impact Assessment, and other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing.~~”

1.72 The final sentence in paragraph 9.33 is proposed to be deleted as it is now covered in the policy.

AP76. GMCA to amend the wording of part C of JP-P6, to more closely reflect the wording from paragraph 9.33 regarding “other proposals which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing to be inserted within the policy” (or similar).

PfE Response

1.73 A proposed main modification to Criterion C of JP-P6, to more closely reflect the wording from paragraph 9.33 is set out below. As set out in response to AP75, it is proposed that the wording in paragraph 9.33 is deleted as it is now fully covered in the policy.

“C. and other proposals ~~where the local planning authority considers it appropriate~~ which, due to their location, nature or proximity to sensitive receptors, are likely to have a notable impact on health and wellbeing.”

AP77. GMCA to modify part 1 of JP-P6 to refer to “proportionate to the additional demand that they would generate” rather than “would significantly increase demand”.

PfE Response

1.74 It is proposed that Criterion 1 of Policy JP-P6 should be modified to refer to “proportionate to the additional demand that they would generate” rather than “would significantly increase demand”. This will ensure that Policy JP-P6 effective and consistent with national policy.

1.75 This modification will be added to the updated schedule of proposed main modifications to replace PMM2.1 The proposed main modification is as follows:

“1. Requiring, where appropriate, the provision of new or improved health facilities as part of new developments ~~that would significantly increase demand~~ proportionate to the additional demand that they would generate;”

JP-P7 Sport and recreation

AP78. Delete part 2 of policy JP-P7 relating to standards for play areas and amend part 3 to read “Where appropriate setting out more comprehensive and detailed recreational standards and standards for provision for designated play areas in district local plans, having regard to existing and future needs” (or similar).

PfE Response

- 1.76 It is proposed to delete part 2 of policy JP-P7 relating to standards for play areas and amend part 3 to read: “Where appropriate setting out more comprehensive and detailed recreational standards and standards for provision for designated play areas in district local plans, having regard to existing and future needs”. This will ensure that JP-P7 provides an effective strategic framework to inform the preparation of local plans.
- 1.77 This modification will be added to the updated schedule of proposed main modifications to replace PMM2.1. The proposed main modification is as follows:
- ~~“2. Developing a common standard for the provision of designated play areas to meet the needs of the population~~
3. Where appropriate setting out more comprehensive and detailed recreational standards and standards for provision for designated play areas in district local plans, having regard to existing and future needs”

M11. Connected Places

JP-C1 An integrated network

AP79. The modification proposed in GMCA20 relating to Picture 10.4 indicating the number and proportion of trips by public transport/active travel and car/other in 2017 and 2040 should be included in the updated schedule of proposed main modifications to replace PMM2.1. Consideration should be given to whether the first column should relate to a later date than 2017 and/or whether the title should be amended.

PfE Response

- 1.78 The modification proposed in GMCA20 relating to Picture 10.4 indicating the number and proportion of trips by public transport/active travel and car/other in 2017 and 2040 will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.
- 1.79 It is considered that the first column should relate to 2017 because this aligns with the Transport Strategy 2040 monitoring and will ensure a consistent

baseline between the two strategies. The title will be updated to “Change in daily trips (2017 to 2040)” in order to ensure continued alignment with the Transport Strategy 2040.

AP80. The modification proposed in GMCA20 relating to paragraph 10.27 and the prioritisation of sustainable modes of transport should be included in the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

1.80 The modification proposed in GMCA20 relating to paragraph 10.27 and the prioritisation of sustainable modes of transport will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-C2 Digital connectivity

AP81. The modification proposed in GMCA20 relating to policy JP-C2 and internet connections should be included in the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

1.81 The modification proposed in GMCA20 relating to policy JP-C2 and internet connections will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

1.82 The modification proposed provides further clarity in respect of the expectations for developers including in relation to issues of costs and viability.

Strategic Road Network

AP82. The modification proposed in GMCA20 to include an additional policy relating to the Strategic Road Network after paragraph 10.55 should be included in the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

1.83 The modification proposed in GMCA20 to include an additional policy relating to the Strategic Road Network after paragraph 10.55 will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-C4 Streets for all

AP83. The modification proposed in GMCA20 relating to the first sentence of the second paragraph of policy JP-C4 should be included in the updated schedule of proposed main modifications to replace PMM2.1.

PfE Response

- 1.84 The modification proposed in GMCA20 relating to the first sentence of the second paragraph of policy JP-C4 will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-C6 Freight and logistics

AP84. GMCA to prepare a main modification to policy JP-C6 to include reference to the provision of overnight parking facilities for heavy goods vehicles on employment sites in defined circumstances⁵.

PfE Response

- 1.85 Insert a new paragraph after 10.71 in the RJ:
“It is recognised that on certain parts of the SRN and at certain times a shortage of parking facilities for HGVs can make it difficult for drivers to find safe space to stop and adhere to requirements for mandatory breaks and rests. The provision of new and improved facilities would improve driver welfare and help avoid inappropriate HGV parking on local roads. To alleviate the shortage, the expansion and improvement of existing facilities, or creation of new facilities, will be supported where it is appropriate to do so.”
- 1.86 Insert new bullet point in JP-C6 after point 4: “Enabling the provision of overnight parking and rest areas, with appropriate facilities, for heavy goods vehicle drivers, where there is likely to be demand, and it is appropriate to the location.”
- 1.87 Insert new bullet point in JP-C7 after point 11: “Providing for overnight parking and rest areas, with appropriate facilities, for heavy goods vehicle drivers, where the development is likely to generate demand, and it is appropriate to the location.”
- 1.88 Please note that the modification set out in paragraph 1.86, relating to heavy goods vehicles, supersedes that submitted in the PfE response to IN19 at AP29, paragraph 5.10. These modifications will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

JP-C7 Transport requirements for new development

AP85. GMCA to prepare a main modification to policy JP-C7 to include:

- (a) Part 1 bullet point 2 to read: “Ensuring that the layout, design and landscaping of development prioritises the provision of safe, secure and attractive access to local

⁵ See also IN19 AP29 relating to policy JP-J4.

services and facilities for pedestrians, people using mobility aids and cyclists” (or similar).

(b) Part 7 to read “Making adequate car parking provision for disabled drivers and passengers” (or similar).

(c) The changes proposed in GMCA20 relating to the part of the policy relating to Transport Assessments, Transport Statements and Travel Plans subject to:

- Clarification of what is meant by “These should take account of the PfE evidence base, alongside District Local Plan evidence and the prevailing conditions at the time of preparation” (or deletion of that sentence).
- Clarification of what is meant by “Holcroft Moss the Manchester Mosses SAC”.

(d) Deletion of the last paragraph “District Local Plans may set out mechanisms ...” as proposed in GMCA20.

PfE Response

AP85(a)

1.89 Delete Part 1 bullet 2 relating to walking and cycling as the primary means of local access in new development and replace it to read: “Ensuring that the layout, design and landscaping of development prioritises the provision of safe, secure and attractive access to local services and facilities for pedestrians, cyclists, and people with a disability”. This will improve the clarity of the policy.

1.90 This modification will be added to the updated schedule of proposed main modifications to replace PMM2.1.

AP85(b)

1.91 Delete Part 7 relating to complying with parking standards and replace it with “Making adequate car parking provision, including for disabled drivers and passengers”. This will improve the clarity of the policy.

1.92 This modification will be added to the updated schedule of proposed main modifications to replace PMM2.1.

AP85(c)

1.93 It is considered necessary to amend the further modification to JP-C7, proposed in GMCA20, relating to the part of the policy dealing with Transport Assessments, Transport Statements and Travel Plans in order to ensure the policy is effective. It is considered necessary to replace the final sentence with reference to a new appendix which lists the potential interventions that should be considered during the TA process. This amended text will be included in the updated schedule of proposed main modifications to replace PMM2.1.

1.94 Additional text within the RJ is also considered necessary to provide the appropriate context for Policy JP-C7 and the new Appendix.

1.95 The proposed modifications to both the RJ and Policy JP-C7 are set out below.

1.96 INSERT TEXT IN THE RJ (to be inserted after para10.76):

Policies within JPA-C7 seek to enable a reduction in the need to travel by private car and prioritise sustainable transport opportunities ahead of capacity enhancements on the highway network. Where a transport assessment is required, this should start with a vision of what the development/allocation is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. In the first instance, new development should give priority to walking, wheeling and cycle movements and facilitate access to high-quality public transport where possible. Appendix D⁶ sets out the indicative transport mitigation that has been identified in relation to the Plan allocations (through the Locality Assessment process and the SRN Future Work Programme Technical Report) in a single strategic “worst-case” scenario. Detailed scenarios, underpinned by local traffic counts, will need to be assessed and developers will need to develop effective detailed mitigation for the site which demonstrates that the mitigation will deliver the vision identified.

The interventions in Appendix D to support walking, wheeling and cycle movements and to facilitate access to high-quality public transport should be considered as a starting point for developers to mitigate the impacts of allocations.

The highway interventions in Appendix D should be considered by developers to mitigate the impact of allocations only once alternative options to manage down the traffic impacts of planned development have been considered as a first preference.

The existing evidence suggests that the “necessary” mitigation would be required to deliver the allocations in the scenario tested, and “supporting” mitigation are complementary measures that could further improve the accessibility and/or transport sustainability of the allocation. As a starting point, it would be beneficial to consider both necessary and supporting interventions through the Transport Assessment scenario testing.

In order to assess the cumulative impacts of growth, when undertaking a Transport Assessment for development proposals that are consistent with the Plan, developers will need to consider committed development, including relevant local plan allocations, where there is a reasonable degree of certainty they will proceed within the next 3 years. In consultation with local highways authorities, developers should agree the committed developments / allocations and potential transport interventions (which may come forward in the next 3 years) that should be considered in the assessment. Where development proposals are not consistent with an up-to-date plan or strategy, the Transport Assessment should include all relevant development that is consented or allocated over the entirety of the plan period.

⁶ Labelling of the appendices may change. A copy of the appendix is included at the end of this document.

Developers will be expected to contribute to the funding and delivery of required new infrastructure or services.

1.97 JP-C7 Transport requirements for new development

1.98 INSERT NEW PARAGRAPH AFTER CRITERION 14 OF THE POLICY

Planning applications will be accompanied by a Transport Assessment / Transport Statement and Travel Plan where appropriate, in order to assess impacts and determine the most appropriate mitigation on the SRN and local transport network. Where a transport assessment is required, this should start with a vision of what the development/allocation is seeking to achieve and then test a set of scenarios to determine the optimum design and transport infrastructure to realise this vision. Consultation should be undertaken, at pre-application stage, with the relevant local highway authorities to agree which committed developments / allocations and which potential transport interventions should be considered, with reference to Appendix D, as appropriate.

1.99 It is also proposed to edit the text of the GMCA20 additional paragraph that relates to Holcroft Moss as follows:

1.100 “Planning applications which are required to be accompanied by a Transport Assessment will need to consider air quality impacts on Holcroft Moss, within the Manchester Mosses Special Area of Conservation (SAC). Any proposals that would result in increased traffic flows on the M62 past Holcroft Moss ~~the Manchester Mosses SAC~~ of more than 100 vehicles per day or 20 Heavy Goods Vehicles (HGVs) per day must devise a scheme-specific range of measures to reduce reliance on cars, reduce trip generation and promote ultra-low emission vehicles and provide a contribution towards restoration measures in accordance with the Holcroft Moss Habitat Mitigation Plan.

1.101 These modifications will be included in the updated schedule of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on 16th January 2023.

AP85(d)

1.102 The modifications proposed in GMCA20 relating to deleting the final paragraph in JP-C7 to avoid duplication of policy with JP-D1 will be included in the updated scheduled of proposed main modifications to replace PMM2.1 which will be submitted to the Programme Officers on the 16th January 2023.

M12. Delivering the Plan

Policy JP-D1 Infrastructure implementation

AP86. GMCA to revise the proposed modification to criterion 6⁷ to read “Require applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. This strategy must outline what needs to be provided by when and who will fund and deliver it.”

PfE Response

1.103 The proposed modification to criterion 6, as set out in PMM2.1, will be amended to read “Require applicants to prepare an infrastructure phasing and delivery strategy to be agreed by the local planning authority for sites where build out will be delivered by different developers or in phases. This strategy must outline what needs to be provided by when and who will fund and deliver it.” The modification provides further clarity in respect of the content of the infrastructure strategy required by the policy and brings in a specific reference to the need to reach agreement with the relevant local planning authority.

1.104 This amended modification will be reflected in the updated schedule of proposed main modifications to replace PMM2.1.

AP87. GMCA to revise the proposed modification to criterion 7² to include a cross-reference to policy JP-D2 and/or to set out that any requirements would only be required where necessary to mitigate the impact of development.

PfE Response

1.105 The proposed modification to criterion 7, as set out in PMM2.1, will be amended as follows “Ensure that development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility capacity to support the delivery and occupation of their proposed development. Where potential capacity problems are identified and no improvements are programmed by the relevant infrastructure provider, we will require the developer to contribute to and/or facilitate necessary improvements where this would be necessary to mitigate the impact of development.” The modification ensures consistency with the tests for planning obligations set out under NPPF paragraph 57.

1.106 This amended modification will be reflected in the updated schedule of proposed main modifications to replace PMM2.1.

Policy JP-D2 Developer contributions

AP88. GMCA to prepare a main modification deleting the second paragraph of policy JP-D2 and replacing it with the following: “If an applicant wishes to make a case that a development is not viable, they should provide clear evidence at the planning application stage, identifying the specific issues and/or changes in circumstance

⁷ See PMM2.1

which would create barriers to delivery in a transparent manner and reflecting national guidance.” (or similar).

PfE Response

1.107 It is proposed that a main modification should be made to Policy JP-D2, deleting the second paragraph of the policy and replacing it with the following: “If an applicant wishes to make a case that a development is not viable, they should provide clear evidence at the planning application stage, identifying the specific issues and/or changes in circumstance which would create barriers to delivery in a transparent manner and reflecting national guidance.” The modification ensures consistency with national guidance in respect of the consideration of viability as part of the planning application process.

1.108 This main modification will be included in the updated schedule of proposed main modifications to replace PMM2.1.

Monitoring

AP89. GMCA to prepare potential main modifications to paragraphs 12.21 to 12.23 and Table 12.1 to inform our consideration of whether the proposed monitoring framework is effective, including whether it is focussed on outcomes directly related to policies in the Plan and the development and use of land.

*The deadline for response to AP89 (Monitoring) is **midday on Tuesday 28 February 2023.***

PfE Response

1.109 Potential main modifications will be prepared to paragraphs 12.21 to 12.23 and Table 12.1 to inform the Inspectors’ consideration of whether the proposed monitoring framework is effective, including whether it is focussed on outcomes directly related to policies in the Plan and the development and use of land. These potential modifications will be submitted to the Programme Officers midday Tuesday 28 February 2023.

PfE Response to AP85(c) continued...

Insert new appendix as below:

Appendix D: Indicative Transport Mitigation

Table 1: Indicative transport mitigation associated with PfE Allocations

Allocation Name	Transport Interventions
JPA1.1/GMA01.1 Northern Gateway (Heywood/Pilsworth)	Necessary • M66 Junction 3 / Pilsworth Road junction upgrade • M62 J19 / A6046 Heywood Interchange – intervention to be determined • M66 Junction 2 / A58 additional lane • M66 Link Road • M66 Junction 2 / A58 • Pedestrian and cycle facilities • Introduction of local bus services to/from/within the allocation • Moss Hall Road / Pilsworth Road (South) junction upgrade • A6045 Heywood Old Rd / Whittle Lane additional traffic management measures • Moss Hall Road / Pilsworth Road (North) junction upgrade • Hollins Brow / Hollins Lane junction upgrade • Pilsworth Road (Between M66 Link Road and “3-Arrows” Junction) upgrade to dual carriageway standard Supporting • Bus Rapid Transit (BRT) corridor linking Manchester city centre and Rochdale via Heywood Old Road/ Manchester Road
JPA1.2/GMA01.2 Northern Gateway (Simister and Bowlee)	Necessary • M60 Junction 19 / A576 Middleton Road – signalisation of the Northern and Eastern Arms (A576 N and the M60 West Bound off Slip) • M62 J19 / A6046 Heywood Interchange – pedestrian and cycle measures • Corridor improvements on A576 Middleton Road / Manchester Old Road in vicinity of M60 J19 – interventions to be determined. • Pedestrian and cycle facilities

Allocation Name	Transport Interventions
	• Introduction of local bus services to/from/within the allocation Supporting • New Metrolink stop on proposed line between Crumpsall and Middleton • Bus Rapid Transit (BRT) corridor linking Manchester city centre and Rochdale via Heywood Old Road/ Manchester Road • Improvement of A6045 Heywood Old Road / A576 junction • A6045 Heywood Old Road / Langley Lane signalisation
JPA2/GMA02 Northern Gateway (Stakehill)	Necessary • A627(M) / A664 Rochdale Road (Slattocks) roundabout improvement • M62 J20 • A627(M) Chadderton Way • Bus Improvements including new Rochdale-Oldham service • Walking and cycling improvement Supporting • Potential New Rail Station at Slattocks • M62 J19 improvements/ A6046 Middleton Road Heywood Interchange • M60 J19/ A576 Middleton Road improvements • Resurfacing of Thornham Lane • Tactile kerb installation between the northern site and Castleton Station • Extension of Local Link services
JPA3.1 & JPA3.2 / GMA03.1 & GMA03.2 Roundthorn MediPark Extension & Timperley Wedge	Necessary • Timperley Wedge Spine Road • Roundthorn Medipark Spine Road • M56 Junction 3 • M56 Junction 6 • Stopping up Whitecarr Lane at its junction with Newell Road • Stopping up Clay Lane/Barnacre Avenue from north of Capenhurst Close • Stopping up Clay Lane (at the western end of the Timperley Wedge Spine Road) • Dobbinetts Lane/Floats Road junction upgrade

Allocation Name	Transport Interventions
	• Upgrade Dobbinetts Lane to standard width along its length • Improvement of Thorley Lane/ Runger Lane • Upgrade Terminal 2 Roundabout to a signalised roundabout • Timperley Wedge Spine road Beeway • Beeway link to Timperley Wedge Spine Road • Spine Road crossing points • Improved connections with proposed Beeway at Whitecarr Lane towards Newall Green • Bus service improvements • Clay Lane bus gate • Bus priority infrastructure on the Timperley Wedge Spine Road • Metrolink Western Leg Extension – Metrolink stop at Timperley Wedge Supporting • Metrolink Western Leg Extension • Airport to Altrincham Bus Rapid Transit (BRT) / Bus Priority • M56 J6 (Redesign of pedestrian and cycle facilities) • M56 J5 and wider corridor improvement (improvement to be determined)
JPA4/GMA04 Bewshill Farm	Necessary • Pedestrian and cycle facilities and connection to the existing network • Contribution towards the Local Link service Supporting N/A
JPA5/GMA05 Chequerbent North	Necessary • Chequerbent roundabout Link Road or junction improvement • Improvement at M61 J5 • Pedestrian and cycle connection between the allocation and the existing network Supporting • Measures (highway connections and/or east-west public transport) delivered by policy GM Strat 8 • Metro Tram-train improvements on the Wigan-Manchester railway line

Allocation Name	Transport Interventions
	Implementation of the Westhoughton Bee Network scheme
JPA6/GMA06 West of Wingates / M61 Junction 6	Necessary - Public transport improvements – Local Link established, or bus service frequencies increased - M61 J5 Improvement - Blackrod Road/Manchester Road (signal timings) - A6 De Havilland Way/A6 Chorley Road junction improvements (adjacent to M61 Junction 6) - Spine road and Dicconson Lane roundabout - Hall Lane/Bolton Road - M61 Junction 6 improvements - Mansell Way / De Havilland Way (amended signal timings) - Pedestrian and cycle enhancements external to the allocation Supporting N/A
JPA7/GMA07 Elton Reservoir Area	Necessary - Link Road and access junctions - Elton Metrolink Stop and Park & Ride facility - Radcliffe Town Centre Improvements - New bus services and associated stops to/through/within the allocation - Pedestrian and cycle facilities internal and external to the development – delivery of missing section of the Bolton-Bury Cycleway Supporting - A56/Radcliffe Road signal improvements - A58/Ainsworth Road/ Starling Road signal improvements
JPA9/GMA09 Walshaw	Necessary - Link road providing bus penetration through the allocation between Lowercroft Road and Scobell Street, via Walshaw Road. - Croston Road/ Tottington Road junction - Tottington Road/Walshaw Road priority junction - Cockey Moor Road junction

Allocation Name	Transport Interventions
	• A58 Bolton Road/Ainsworth Road junction improvement • A58 Bolton & Bury Road/Starling Road junction improvement • Introduction of bus services through the allocation • Provision of off-site active travel infrastructure Supporting • Elton Link Road
JPA10/GMA10 Global Logistics	Necessary • A538/Sunbank Lane Improvement • Sunbank Lane walking and cycling accesses and crossing Supporting • M56 Junction 6 (Redesign of pedestrian and cycle facilities)
JPA11/GMA11 Southwick Park	Necessary N/A Supporting N/A
JPA12/GMA12 Beal Valley	Necessary • New Metrolink Stop and Park and Ride facility adjacent to Broadbent Moss and Beal Valley allocations • Metrolink Overbridge • Key internal highway network (spine road) • Improvement of A663 Shaw Road / A671 Oldham Road junction • Improvement of A663 Crompton Way / Rochdale Road / Beal Lane junction • Improvement of B6194 Heyside / Water Street / Bullcote Lane junction • Improvement to and/or provision of new local bus services and facilities • Improvement of walking/cycling facilities including on Heyside and Cop Road via new Metrolink overbridge bridge

Allocation Name	Transport Interventions
	Supporting • Improvement of A627 (M) / Chadderton Way / A663 Broadway interchange • Improvement of Elizabethan Way / A640 Newhey Road / A6193 Sir Isaac Newton Way roundabout interchange • A640 Huddersfield Road / A640 Newhey Road / A663 Shaw Road / Cedar Lane enhancements to the operation of the signal-controlled junction
JPA13/GMA13 Bottom Field Farm (Woodhouses)	Necessary • Cycling and walking improvements • Minor Traffic Management improvements Supporting N/A
JPA14/GMA14 Broadbent Moss	Necessary • New Metrolink Stop and Park and Ride facility adjacent to Broadbent Moss and Beal Valley allocations • Key internal highway network (spine road) • Metrolink Overbridge • Improvement of A663 Shaw Road / A671 Oldham Road junction • Improvement of A663 Crompton Way / Rochdale Road / Beal Lane junction • Improvement of B6194 Heyside / Water Street / Bullcote Lane junction • Improvement to and/or provision of new local bus services and facilities • Traffic calming Vulcan Street Supporting • Improvement of A627 (M) / Chadderton Way / A663 Broadway interchange • Elizabethan Way / A640 Newhey Road / A6193 Sir Isaac Newton Way • A640 Huddersfield Road / A640 Newhey Road / A663 Shaw Road / Cedar Lane enhancements to the operation of the signal-controlled junction

Allocation Name	Transport Interventions
JPA15/GMA15 Chew Brook Vale (Robert Fletcher)	Necessary • Sustainable access package of off-site improvement to walking and cycling routes • Access road and bridge over Chew Brook • A635 Holmfirth Road access junction Supporting N/A
JPA16/GMA16 Cowlshaw	Necessary • Improvement of A663 Shaw Road / A671 Oldham Road junction • Improvement of A663 Crompton Way / Rochdale Road / Beal Lane junction • Upgrade of PRow to Low Crompton to Bee Network standard Supporting • Improvement of A627 (M) / Chadderton Way / A663 Broadway interchange • Improvement of A671 Rochdale Road / B6195 High Barn Road / A671 Oldham Road / B6195 Middleton Road junction
JPA17/GMA18 Land South of Coal Pit Lane (Ashton Road)	Necessary • Improvement of Coal Pit Lane/A627 Ashton Road Junction including localised improvement of Coal Pit Lane • Pedestrian and cycle route between Coal Pit Lane / Ashton Road Junction and White Bank Road Supporting • Rochdale-Oldham-Ashton Quality Bus Transit corridor
JPA18/GMA19 South of Rosary Road	Necessary • Permeable network for pedestrian and cyclist priority within the allocation & PRow connections to Bardsey Bridleway • Minor traffic management improvements Supporting

Allocation Name	Transport Interventions
	Rochdale-Oldham-Ashton Quality Bus Transit corridor
JPA19/GMA20 Bamford and Norden	Necessary - Norden Road / War Office Road scheme - Norden Road pedestrian crossing - Bus stop upgrades at the Norden Road / War Office Road junction - Furbarn Road improvements - North-South Greenway Supporting N/A
JPA20/GMA21 Castleton Sidings	Necessary - Manchester Road / Queensway (signal alterations) - Active travel links beyond allocation boundary Supporting N/A
JPA21/GMA22 Crimble Mill	Necessary - Public Transport improvements – bus stop upgrades on A58 Rochdale Road East - Sustainable travel improvements - Crimble Lane improvements Supporting N/A
JPA22/GMA23 Land North of Smithy Bridge	Necessary - A58 Halifax Road / B6225 Hollingworth Road / A6033 Todmorden Road signals - A58 Wardle Road signals - Hollingworth Lake car park - Traffic calming and parking management measures along Hollingworth Road - Secure cycle parking at Littleborough Rail Station - Bus stop upgrades along Hollingworth Road and Lake Bank. Supporting - A58 Residential Relief Road

Allocation Name	Transport Interventions
	A58 local improvements
JPA23/GMA24 Newhey Quarry	Necessary - Elizabethan Way / A640 Newhey Road / A6193 Sir Isaac Newton Way - Pedestrian crossing on A640 Huddersfield Road - Existing residents' car park - Newhey Metrolink Park and Ride car park Supporting - Improvements to existing bus services
JPA24/GMA25 Roch Valley	Necessary - A58 Halifax Road / B6225 Hollingworth Road A6033 Todmorden Road signals - A58 Wardle Road signals - Secure cycle parking at Smithy Bridge Rail Station - Bus stop upgrades along Smithy Bridge Road and Halifax Road - Toucan Crossing at Smithy Bridge Rail Station - Toucan crossing at allocation entrance on Smithy Bridge Road Supporting - A58 Residential Relief Road - Cycle improvements towards Smithy Bridge Rail Station - Upgrade to level crossing on Smithy Bridge Road - A58 local improvements - Footway/cycleway to the south of the proposed access road
JPA25/GMA26 Trows Farm	Necessary - A664 Queensway / Cowm Top Lane Signalisation - A664 Queensway / A664 Manchester Road Signal Junction Staging Amendments - Pedestrian and cycle improvements on Hillcrest Road Supporting - M62 Junction 20
JPA26/GMA27 Land at Hazelhurst Farm	Necessary A580 East Lancashire Road/ Moorside Road crossing improvements

Allocation Name	Transport Interventions
	• Worsley Road crossing • Ramped cycle & disabled access from Greenleach Lane to NCN55 • Local transport/sustainable travel improvements Supporting N/A
JPA27/GMA28 Land East of Boothstown	Necessary • Sustainable transport measures • Footpath along Leigh Road • Footpath from canal to Occupation Road access • Leigh Road active travel crossing • Newearth Road active travel crossing Supporting N/A
JPA28/GMA29 North of Irlam Station	Necessary • B5320 Liverpool Road / B5471 Brinell Drive junction improvement • A57 Cadishead Way / B5311 Fairhills Road junction improvement • B5320 Liverpool Road / Roscoe Road / B5311 Fairhills Road junction improvement • Bridge replacement to afford access via Moss Lane • Station Access - Active Travel Improvements between the station and allocation • Irlam Bee Network links • Increased provision of cycle parking at Irlam rail station Supporting • Junction 11 of the M60 (2025-2030) • CLC Rail line capacity improvements • Metro/Tram-train services on the CLC line • A57 Liverpool Road/ Stadium Way Junction improvement • Improvements to bus services • Cheshire Line Connection / Trafford Green Way – Walking & Cycling Improvements • Traffic calming & parking management
JPA29/GMA30 Port Salford Extension	Necessary • WGIS infrastructure

Allocation Name	Transport Interventions
	• Rail freight terminal • Canal berths & container terminal • Link Road between A57 Liverpool Road (linked to new junction on the M62) • Access to allocation off link road – roundabout on link road to provide access to Port Salford Extension • M60 J11 improvements • M60 J10 improvements • M60 J12 improvements • New junction on M62 • Identification of a scheme at the A57 Liverpool Road/ Stadium Way junction • Bus service improvement • Walking & cycling improvements to link to the Bee Network Supporting • CLC Rail line capacity improvements • Metro/Tram-Train services on CLC line • Metrolink extension to Port Salford • Rail study improvements • Improvement at A57 Cadishead Way / B5311 Fairhills Road junction • Improvements to Local Link services • Walking & cycling improvements: Cheshire Lines Connection / Trafford Greenway
JPA30/GMA38 Ashton Moss West	Necessary • A6140 Lord Sheldon Way / Notcutts / A6140 (this junction forms part of the wider M60 J23 split interchange) • A635 Manchester Road / A6140 / A635 Signalised Crossroads (this junction forms part of the wider M60 J23 split interchange). • M60 J23 (North) / A635 Manchester Road • Walking and cycling measures • Enhancement of bus services Supporting N/A
JPA31/GMA39 Godley Green Garden Village	Necessary • Improvement of M67 / A57 Hyde Road / A560 roundabout junction • Walking and cycling measures

Allocation Name	Transport Interventions
	- Provision of direct pedestrian/cycle access bridge across the railway line to the vicinity of Hattersley Station ⁸ - Provision of bus services within the allocation Supporting - Improvement of M60 J24 Denton Island - Package of measures along the A560 (including possibility of Ashton-Stockport QBT)
JPA32/GMA40 South of Hyde	Necessary - Walking and cycling measures - Bus improvements along the A560 Stockport Road adjacent to the allocation Supporting - Package of measures along the A560 (including possible Ashton-Stockport QBT) - Improvement of M67 / A57 Hyde Road / A560 roundabout junction
JPA33/GMA41 New Carrington	Necessary - Carrington Relief Road - Carrington Spur widening approach to M60 J8 - Flixton Road signalised junction Phase 1 signalisation - Flixton Road signalised junction Phase 2 signalisation - Carrington Link Junction Widening Phase 1 - Carrington Link Junction Widening Phase 2 - Isherwood Road Upgrade (part of Eastern link road) - Southern and Eastern Link - Sale West Link - Carrington Relief Road widening between Isherwood Road and start of Carrington Spur - M56 Bowden Roundabout - M60 J8 improvement - A56 Junction / Manchester Road / Barrington Road signalised junction upgrade

⁸ this indicative intervention is a fall-back position, which now unlikely to be considered necessary given the development consent order decision letter made by the Secretary of State on 16 November 2022 and intention of National Highways to commence construction of the A57 Link Roads scheme in Spring 2023.

Allocation Name	Transport Interventions
	• Altrincham / A56 Dunham Road / Highgate Road realignment • Heatley / Paddock Lane / Bent Lane (widen radii) • Creation of new and improved bus services • Public Transport Measures: Carrington to Stretford (via Urmston) corridor • Public Transport Measures: Access to Altrincham Package • Public Transport Measures: Access to Sale Package • Public Transport Measures: Upgrading an extension of the existing bus services – including bus priority measures, real time information etc. • Greenway Link to Sale • PROW improvements • Controlled pedestrian crossings at the A56 Dunham Road / Park Road / Charcoal Road. Supporting • WGIS infrastructure • Trafford Greenway & Bee Network Bridge
JPA34/GMA42 M6 Junction 25	Necessary • Signalisation of Bryn Interchange • M6 Junction 24 Improvement Supporting N/A
JPA35/GMA43 North of Mosley Common	Necessary • Bridgewater Road/Newearth Road junction improvement • Manchester Road East / Armitage Avenue junction improvement • A580 East Lancashire Road / Mossley Common Road junction improvement • Guided busway stop and services • Pedestrian and cycle connectivity Supporting N/A
JPA36/GMA44 Pocket Nook	Necessary • Bridge over future HS2 line

Allocation Name	Transport Interventions
	• Good walking and cycling connections between the site and Rowan Avenue, Maple Avenue, Pocket Nook Lane, Brancaster Drive and the Mayfield Drive Estate, for onward connection in Lowton. Supporting • Improved bus service connectivity • New railway station(s) in local area • A580 East Lancashire Road / A579 Atherleigh Way • A580 East Lancashire Road/ A572 Newton Road • A572 Newton Road/ A579 Winwick Lane • A580 East Lancashire Road/ A574 Warrington Road
JPA37/GMA45 West of Gibfield	Necessary • Chequerbent to Platt Lane link road and associated improvements at Chequerbent roundabout • Improvement at M61 Junction 5 • A577/A579/Gibfield Park Way roundabout improvements • Active travel improvements including link to Daisy Hill rail station Supporting • Any measures (highway connections and/or east-west public transport) delivered by policy GM Strat 8 • Metro/Tram-Train improvements on the Wigan-Manchester railway line • Implementation of the Leigh, Atherton and Tyldesley Bee Network scheme

Table 2: Location of indicative mitigation on the SRN associated with potential cumulative growth

CORRIDOR	Term	Location	RELEVANT ORGANISATION(S)	POTENTIAL FUNDING STREAM
M60 SE	Med	Junction 24 (Denton Island)	Local Authorities Developer(s) National Highways TfGM	NH Future RIS
M60 SW	Long	Junction 6	Local Authority National Highways TfGM	NH Pinch Point / Growth and Housing Fund / similar
M60 NW	Long	Junction 13	National Highways TfGM	RIS / other
M61	Long	Junction 4	National Highways TfGM	RIS / other
M62	Short	Junction 21 and Junction 20	National Highways	RIS (potential gap in programme)
M62	Long	Junction 19	National Highways TfGM	RIS / other
M67	Short	Junction 4 - Committed infrastructure upgrades as part of the Mottram Moor Link Road (MMLR) project	National Highways	N/A – committed (RIS)
A627(M)	Long	Junction 2	National Highways	RIS /other