

Question No 44 - Strategic Green and Blue Infrastructure

Do you agree with this policy? Yes (10) In Part (10) No (0)

Yes (LP385-33, LP321-43, LP315-15, LP312-3, LP309-42, LP305-16, LP299-11, LP297-17, LP291-25, LP28-44)

In part (LP395-13, LP267-30, LP261-4, LP27-14, LP25-1, LP19-3, LP18-2, LP11-3, LP9-26, LP2-4)

	Respondents comments	MCC Response	Respondent ID
1	Support	Support and comments noted	LP2-4, LP9-26, LP11-3, LP18-2, LP19-3, LP27-14, LP28-44, LP29-19, LP254-1, LP261-4, LP267-30, LP291-25, LP297-17, LP299-11, LP305-16, P309-42, LP 312-3, LP315-15, LP 321-43, LP324-3, LP385-33, LP386-20
	General		
2	Implement and expand it quickly.	Comment noted	LP28-44
	Airport		
3	MAG is supportive of the policy but comment that proposals that include significant areas of landscaping and the creation or modification of	No change proposed to the plan. Comments noted. This issue is covered by Policy DM 9 Aerodrome Safeguarding. Where other policies in the Local Plan	LP305-16

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	water bodies may attract birds increasing the risk of bird strike. Aviation safety must be addressed in determining planning applications within 13km of Manchester Airport.	deal with these matters they are not repeated as the plan should be read as a whole.	
4	The Environment chapter contains good policies but the tensions with other parts of the plan e.g. building and aviation should be made explicit in the chapter introduction.	No change proposed to the plan. Comments noted. This issue is covered in the Spatial Portrait Chapter, which sets out the key opportunities and challenges facing the City.	LP267-30
	Recreational routes		
5	The methodology for selecting routes is not clear. The Manchester Green Trail, which is a partnership between MCC, Manchester Active, TfGM and Ramblers should be included as a strategic recreational route	Comments noted. The decision was taken not to include recreational routes that are mostly on highway. In the event of any development which impacted these routes it is expected that they would be diverted along another highway. On this basis most cycle routes and the Manchester Green Trail have not been included. Add to EN1 explanation as follows after “Manchester's strategic recreational routes are shown on the Policies Map and includes routes that are mostly off highway. Routes that are mostly on highway are not shown; where development impacts routes that are mostly on highway it is expected that these would be diverted along another highway. ”	LP25-1
6	Public Rights of Way and other walking routes should also be incorporated early in the design stage.	No change proposed to the plan. Policy EN1 already refers to development proposals needing to incorporate links to existing green and blue infrastructure to improve the accessibility of Manchester’s open spaces. Policy T2 Sustainable Location of Development also seeks to ensure that	LP25-1

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		sustainable modes of transport including walking are prioritised.	
7	The Canal and River trust agrees with the policy as drafted and welcomes the inclusion of canals as strategic recreational routes.	Comments noted.	LP315-15
8	Request that TPT/NCN are incorporated in this section as key components of Manchester's strategic green infrastructure; their protection, enhancement and integration into new developments should be a policy requirement	No change proposed to the plan. The TPT/NCN is included - see 5 th bullet point in Policy EN1 and the Policies Map.	LP365-14
9	Where green corridors intersect or run adjacent SRN routes, these routes should be considered for suitability to prevent indirect implications for the SRN routes.	Support noted. The Local Plan, alongside Places for Everyone, will form the development plan for Manchester. This issue is addressed through other policies in the plan. (Places for Everyone Policy JP - C8 sets out transport requirements for new development including the need for transport assessments where appropriate). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole	LP321-43 (NH)
	Indoor and Outdoor Sports Facilities		
10	The policy (last paragraph) is not strong enough to "protect" existing playing fields or sports facilities. Any such proposal will need to meet the requirements of NPPF paragraph 104, which sets out that existing open space, sports and recreational buildings and land, including playing fields and formal play spaces should not be built on unless an assessment shows them to be surplus to	This policy is not intended to deal with the specific issues around protecting existing playing fields and sports facilities. This is covered by Policy SI 1. However, to clarify this the following change is proposed: Amendment to Environment Chapter Introduction, first paragraph, last sentence, to include text shown in bold, "Policies relating to the protection and enhancement of indoor and outdoor	LP9-26

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	requirements, or their loss would be replaced by the equivalent or better provision or the development is for an alternative sports or recreational provision.	sport and recreational land and facilities open space, however, are located in 13 Social Infrastructure.”	
11	Sport England would strongly recommend the inclusion of reference to their Active Design Guidance to promote healthy communities through the integration of green and blue assets within development.	No change proposed to the plan. Sport England’s Active Design guidance covers a range of principles of wider relevance than the provision of new open space, sport and recreational facilities. Many of these principles are already picked up under other policies such as EN1 strategic Green and Blue Infrastructure and T1 Transport Principles.	LP9-26
12	Sport England request the addition of contributions to the provision of sports facilities included in the list of expectations on developers. They also seek the inclusion of the need for new or improved sports facilities arising from any increase in demand caused by new residential development.	No change proposed to the plan. PfE JP-P7 requires new development to provide new and/or improved existing sport and recreation facilities commensurate with the demand they would generate. Policy SI2 refers to outdoor and indoor sports facilities and increases in demand for such facilities from residential development.	LP9-26
	Green Infrastructure Standards		
13	Natural England provides a link to their Green Infrastructure Framework (GIF). In accordance with their GIF Standards, they encourage all new major development to submit a Green Infrastructure Plan showing how proposals align with their 15 Principles and any Green Infrastructure Standards in local policies. The green infrastructure should be managed, maintained and monitored for 30 years	No change proposed to the plan. Policy EN1 requires long term management and maintenance for any proposed green and blue infrastructure, in line with PfE Policy JP-G 2. Where the GI proposed is also covered by the Biodiversity Net Gain Policy this will be for 30 years. GI covered by EN6 Urban Green Factor is required to be maintained for the lifetime of the building.	LP 325-9

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14	The expectation of developments to improve accessible open spaces could be enhanced with major development standards for accessible greenspace relating to size, proximity, capacity and quality. An initial focus should be on adequate access to open space within a 15 min walk of home.	No change proposed to the plan. Standards relating to quantity, accessibility and quality are provided with respect to recreational open space in Policy SI 1.	LP325-9
	Ecology/ Local Nature Recovery Strategy		
15	EA considers EN1 to align well with their priorities and to positively embed the LNRS and biodiversity enhancement into spatial planning, but would like the policy to be strengthened by changing “development proposals will be expected to...” to "development proposal must", to ensure clearer compliance and accountability in line with Paragraph 16d of NPPF.	No change proposed to the plan. The existing wording provides sufficient clarity for a decision maker.	LP324-3
16	EA requests that EN1 explicitly reference the need to maintain and enhance ecological linkages as connectivity of habitats across development sites is essential. They reference the Flood Hub's blue-green infrastructure framework (FT-Q-R94)	No change proposed to the plan. This issue is already covered by the last bullet point of Policy EN1 which expects development proposals to be consistent with other relevant Local Plan policies and with the priorities and actions set out in the GM Local Nature Recovery Strategy.	LP324-3
17	The Wildlife Trust fully supports this policy as helping protect ecological assets by linking existing green and blue spaces. They suggest that the caveat with regard to where the benefits of a proposed development outweigh the loss of an existing element of green or blue infrastructure should direct compensation to enhance and improve the LNRS	No change proposed to the plan. Development will also need to have regard to the GM Local Nature Recovery Strategy and Network as required by Policy EN 4. This may direct mitigation or compensation toward the LNRS Network. However, flexibility in needed as the specifics of a site may make provision outside the LNRS network more appropriate.	LP291-25

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	ecological network. Notwithstanding this they comment that even areas outside the LNRS network, including small "stepping stones" can aid ecological resilience.		
18	Whilst rivers, waterways and the LNRS network can benefit the local community, access and recreational needs should not be allowed to adversely affect the LNRS function of nature conservation.	Comment noted. The policy wording, together with the policy approach set out in Policies EN4 and EN5, provide sufficient guidance to consider issues on a case-by-case basis in any development proposals.	LP291-25
19	The GM Local Nature Recovery Strategy recognises the urban nature of the region as an opportunity to boost nature and species that thrive in urban areas like swifts. This should be reflected in this policy, recognising the built environment as a potential part of the strategic green and blue infrastructure, facilitating environmental initiatives such as Cyan Lines.	No change proposed to the plan. Policy EN1 includes the mosaic of smaller open spaces, gardens and urban green features, as together forming a strategic element of Manchester's green and blue infrastructure. This is described further in the policy explanation.	LP356-4
20	The third bullet under ' <i>Development proposals will be expected to:</i> ' could be amended to reflect both the LNRS and the biodiversity emergency declared by MCC in 2021 by adding the following bold wording to the text: ' <i>Seek to maximise the benefits that high quality green and blue infrastructure can bring to the local community and beyond, such as improving health, increasing biodiversity, enabling nature recovery and connecting people with nature, adapting to climate change and reducing flood risk,</i>	Change agreed. Amend wording to third bullet point. Seek to maximise the benefits that high quality green and blue infrastructure can bring to the local community and beyond, such as improving health, increasing biodiversity, enabling nature recovery and connecting people with nature , adapting to climate change and reducing flood risk, including through the use of Sustainable Drainage Systems (SuDS)'. 	LP325-9

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	<i>including through the use of Sustainable Drainage Systems (SuDS)'.</i>		
21	Making sure wildlife areas are preserved rather than demolished and replanted is important; also linking existing green spaces with new planting.	Comments noted. The policy wording provides sufficient flexibility that takes account of the issue raised.	LP299-11
	Trees and Woodlands		
22	The Woodland Trust particularly support the specific mention of the urban forest; the requirement for developers to maintain and enhance green and blue infrastructure; incorporate it into early design stage and improve accessibility.	Support noted	LP312-3
23	More emphasis should be given to protecting trees, including existing and proposed, providing more green infrastructure in the public realm through Section 106 contributions,	No change proposed to the plan. Policy EN3 sets out further details around the protection of existing and proposed trees and Policy DC1 refers to public realm improvements through developer contributions.	LP374-10
	Water Quality		
24	EA requests that EN1 includes a requirement for all development to demonstrate compliance with Regulation 33 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, to ensure development does not cause deterioration of any WFD element, does not prevent the attainment of "good" ecological status and, where possible, supports improvement of water body classification.	No change proposed to the plan. See comments under Policy EN2.	LP324-3
	SuDS/Natural Flood Management		

	Respondents comments	MCC Response	Respondent ID
25	EA requests that EN1 explicitly require the use of SuDS and natural flood management features in all new development in green/blue corridors. They reference GM Surface Water Management Plan and the Manchester Salford Trafford (MST) Hybrid SFRA.	No change proposed to the plan. Bullet point 3 in the second paragraph of EN1 already addresses this.	LP324-3
26	UUW welcomes reference to SuDS. it is critical that green and blue infrastructure is integrated with surface water management strategy. To achieve this significant change is required to the Flood Risk policy in line with our answer to Q52.	No change proposed to the plan. See comments under Policy EN 9.	LP386-20
27	Request for measures to prevent people from paving front gardens due to the consequent increase in flood risk.	No change proposed. Comment noted. Paving front gardens is dealt with under permitted development regulations.	LP254-1
28	Concept of Manchester as a sponge city is excellent and incorporating strategies to soak up rainfall and preventing increased hard standing, paving etc would be helpful.	Support noted	LP299-11
	Heritage		
29	Ensure green and blue infrastructure is integrated with heritage conservation including canal network; to contribute to the quality of green and blue spaces, create a sense of place and improve the setting of historic buildings/townscape. Suggested change: Consider the need to include the role that green and blue infrastructure can have to play in helping to conserve and enhance the historic environment.	Change agreed. Add additional bullet point to EN1 to read - Consider the role that green and blue infrastructure can play in helping to enhance the historic environment.	LP374-10, LP318-23

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	Protection of Open Space		
30	Strengthen the wording of the last paragraph so any mitigation is the last resort and any outweighing economic benefits are clearly identified.	Change agreed. Suggest adding words to the last paragraph of Policy EN1. “ Where the benefits of a proposed development are considered to outweigh the loss of an existing element of green or blue infrastructure, the developer will be required to justify why the loss is necessary and demonstrate how this loss will be mitigated in terms of quantity, quality, function and future management.”	LP25-1
31	Small green spaces e.g. pocket parks, community gardens, green-ways, should be identified and given explicit support as well as the strategic areas.	No change proposed to the plan. Policy EN1 recognises the cumulative importance of the mosaic of small open spaces across Manchester, however the Local Plan generally only identifies the larger strategic sites.	LP267-30
32	There should be a presumption against development on existing elements of green and blue infrastructure or green field sites other than in exceptional circumstances.	Comments noted. There will be circumstances where a development will impact an existing element of green infrastructure. The policy wording is considered to allow a balanced view to be taken on a site-specific basis. However, a change to the existing wording of the last paragraph of Policy EN1 is proposed (See response 30. Above)	LP27-14, LP267-30
	Evidence		
33	Policy should include reference to the Open Spaces Assessment as a key evidence document.	Change agreed. Addition to paragraph 12.4 of the Environment Chapter Introduction, to add the Open Space Assessment to the list of evidence provided.	LP395-13
	Management of Open Space		

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	Policy should include reference to working with landowners to improve access to private nature spaces; community engagement in shaping public realm and social value and stewardship.	No change proposed to the plan. The Local Plan policy already requires management proposals to be submitted to ensure a site is looked after, and consideration to be given to issues such as social value (Policy SI3) and accessibility for example EN2. Developers are also required to engage with the local community to help shape site specific proposals prior to submitting major planning applications.	LP374-10 LP395-13
	Requests relating to specific sites		
34	The Local Plan should protect green and blue routes including but not limited to, Cyan Lines, Castlefield Viaduct, Pioneer Quay, Beaufort St/Duke St corner and Roman Gardens. (see list of locations also submitted as part of Call for Sites).	No change proposed to the plan. Strategic recreational routes are identified and protected through Policy EN1. This policy also requires development proposals to facilitate extensions to and connections with these routes where appropriate and to incorporate links to existing green and blue infrastructure. An assessment of specific sites regarding their suitability as Local Green Spaces has also been undertaken.	LP2-4, LP374-10
35	Cyan Lines should have explicit description and explanation of how it fits with Green and Blue Strategy.	Change agreed. Addition to the Policy Explanation to include the following after paragraph 12.12 “Work is ongoing to extend the network and improve accessibility. Cyan Lines is an example of an ongoing partnership project which aims to connect blue and green spaces across Manchester City Centre and beyond, creating a high quality network of walking, wheeling and cycling routes for residents, visitors and nature.	LP2-4, LP 281-8, LP374-10, LP358-9, LP311-10,

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		The Local Plan thematic policies, particularly EN1 Strategic Green and Blue Infrastructure and EN2 River Valleys and Waterways provide the planning framework to support the development of such a network within Manchester.”	
36	Would like Fallowfield Loop mentioned as a green space with potential to become even more of a walking and nature reserve.	No change proposed to the plan. The Fallowfield Loop is included as a recreational route on the Local Plan Policies Map. Policy EN1 recognises recreational routes as being part of the green and blue infrastructure network, enhancing accessibility to green spaces for people and providing corridors for wildlife.	LP370-1
37	Ryebank Fields should be included in this policy as it fits the policy size requirements; it is part of a network of green spaces and contributes to the environmental health of the city.	No change proposed to the plan. This policy refers to the key elements that make up Manchester’s green and blue infrastructure. It does not address specific sites but sets out principles that development proposals will need to consider at an early stage.	LP267-30, LP18-2
38	Objection to the redevelopment of Ryebank Fields, but in support of in town redevelopment.	The consideration of the proposed redevelopment of Ryebank Fields will be dealt with via the current planning application. It is therefore a matter for Development Management and outside the scope of the Local Plan.	LP258-1
39	Nutsford Vale is an established semi natural part of the green infrastructure, which has minimal funding and needs to be managed better (removal of fly tipping and more planting)	No change proposed to the plan. The issue of the management of individual areas of green infrastructure is outside the scope of the Local Plan	LP261-4
	Castlefield		

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40	Local Plan refers to Castlefield as a route. Castlefield with its canals, rivers and green spaces should be an ecological destination or hub. Castlefield Basin should be an "urban ecology and heritage corridor", with environmental projects required within development obligations.	No change proposed to the plan. Ecology and heritage issues are considered on a site-by-site basis in accordance with policies contained within the Environment and the Design Quality and Heritage chapters of the Local Plan. See Policies EN2 and Policy D4.	LP374-10
41	The policy should also mention the Bridgewater Canal and extensive waterways and locks off Castlefield Bowl as a major strategic asset; its protection as a heritage asset is important for the economy.	Change agreed in part. Amend policy wording of first bullet point to read "The Irk, Irwell, Medlock, Mersey and Bollin River valleys; the Chorlton, Platt, Gore, Gatley and Moston Brooks, and the Rochdale, and Ashton and Bridgewater Canals,...."	LP2-4, LP281-8, LP374-10, LP358-9, LP311-10
42	Request that identified sites in Castlefield are preserved, improved/enhanced or created as follows: a. Porcelanosa - protect, enhance with additional street trees b. Ellesmere St Planters - protect and enhance with more planting c. Hulme Hall Planters - Protect and enhance with more planting d. Blantyre St Triangle - Improve this important gateway site to the city centre e. Chester Rd Roundabout - Improve with planting and lighting to create a city centre gateway	Comments noted a. Porcelanosa – Comments with regard to the sites future development noted. b. Ellesmere St Planters – Site has now been developed c. Hulme Hall Planters – The detailed consideration of planters is beyond the scope of the Local Plan d. Blantyre St Triangle - Request for improvements is an operational matter beyond the scope of the Local Plan e. Chester Rd Roundabout - Request for improvements is an operational matter beyond the scope of the Local Plan	LP360-2

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	f. Water St - This site needs cleaning up and improving with more trees to create a pocket park. g. Halfords - This grassed area outside Halfords on Chester Rd needs improving with planting, a path and signage. h. St Georges Island - needs improving and developed into a community green space, with community hub. i. Kara Makeup site - The land under the former Urban Splash offices needs improving with more greenery. j. Castlefield Viaduct - The full masterplan to continue the current pilot project and extend the Viaduct to Woden's Bridge should be supported by MCC. k. United Utilities offer to green a building on Ellesmere St should be supported. l. Land to east of Saul Hay Gallery/Chimney - should become a pocket park. m. Upper and Lower Yard at Science and Industry Museum - The science and industry Museum is investing in significant improvements to outdoor spaces, with the first phase to be completed in March 2026.	f. Water St - Request for improvements is an operational matter beyond the scope of the Local Plan g. Halfords - Request for improvements is an operational matter beyond the scope of the Local Plan h. St Georges Island – This is beyond the scope of the Local Plan i. Kara Makeup site - Request for improvements is an operational matter beyond the scope of the Local Plan j. Castlefield Viaduct - The importance of Castlefield Viaduct is noted. k. United Utilities offer to green a building on Ellesmere St – The general principle of greening is supported through Policy EN1 and other Local Plan policies, but detailed building level requests are beyond the scope of the Local Plan. l. Land to east of Saul Hay Gallery/Chimney - The creation of a pocket park is beyond the scope of the Local Plan. m. Upper and Lower Yard at Science and Industry Museum – improvements noted.	
	Local Green Space		

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43	Include Ryebank Fields as a Local Green Space.	Requests for Local Green Space designation have been considered via a separate report	LP11-3, LP19-3, LP254-1, LP274-3
44	Include Lower Medlock Valley (Ancoats and Beswick)	Requests for Local Green Space designation have been considered via a separate report	LP19-3
45	Include "Bob's Hill" and Sandhills in Collyhurst as Local Green Spaces.	Requests for Local Green Space designation have been considered via a separate report	LP19-3, LP274-3

Question No 45 - River Valleys and Waterways

Do you agree with this policy? Yes (13) In Part (5) No (0)

Yes (LP395-14, LP321-44, LP318-24, LP315-16, LP312-4, LP309-43, LP305-17, LP299-12, LP297-18, LP291-26, LP263-2, LP28-45, LP27-16)

In part (LP272-14, LP25-2, LP18-3, LP10-1, LP9-42)

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	SuDS and Flood Risk Policy		
1	Uuw welcomes the reference to SuDS in this policy. It is critical that every opportunity is taken to integrate SuDS. To achieve this, we recommend that significant change is required to the Flood Risk policy in accordance with our answer to question 52 and the drainage and flood policy wording which as set out in the appendix .	Support noted. See comments under Policy EN 9.	LP386-21
2	Integration of SuDS / nature-based drainage is welcomed to reduce runoff and flood risk near SRN corridors. Proposals near SRN routes should consider interactions with highway drainage systems, as National Highways cannot allow new drainage outfall into SRN systems	Support noted. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole. Issues regarding drainage are dealt with under Policy EN9.	LP321-44 (NH)
3	Overall, the Environment Agency consider Policy EN2 provides a strong foundation but would benefit from clearer integration with WFD objectives, stronger support for NFM, and more robust pollution prevention and buffer zone requirements	Change agreed. Addition to the first bullet point of Policy EN2: “Assess hydrological, hydromorphological and ecological effects on adjacent and nearby water bodies, to ensure there is no deterioration to existing water quality or ecological value of the waterbody. Where applicable, this may include a Water Framework Directive Assessment, which would	LP324-4. (EA)

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		need to be considered as part of any Environmental Impact Assessment required for a planning application. “ Add new bullet point after bullet point 7 to read: “Implement the potential for Natural Flood Management (NFM), where viable, including techniques such as re-meandering, wetland creation, and floodplain reconnection, where appropriate. Change proposed to Policy Explanation Paragraph 12.22 (was paragraph 12.21) The importance of our rivers and canals is recognised in national and regional policy. The North West River Basin Management Plan, as required by the Water Framework Directive, provides the statutory framework for the region's water environment. Water Framework Directive Assessments are particularly required for strategic sites or those near sensitive water bodies. In Manchester this would include sites with either the River Medlock, Irk or Irwell running through them or near enough to impact them. Within Greater Manchester (excluding Stockport), Places for Everyone has been developed using a robust evidence base, including strategic flood risk assessments, river restoration studies, and work to understand the natural capital value of the Irwell	

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		and Mersey catchments, which includes Manchester's rivers and tributaries. There is also a commitment to Natural Flood Management (NFM) where viable, an approach that not only reduces flood risk but also enhances biodiversity and water quality. EA suggest that integration with the Greater Manchester Surface Water Management Plan and the MST Hybrid 8 (SFRA) should be referenced to ensure alignment with regional evidence and best practice. Suggest this should be covered under EN9 Flood Risk With regard to buffer zones amend wording of second bullet (now third bullet) as follows: Improve water quality by providing access to the waterway to allow necessary maintenance by the riparian owner; and statutory agencies, as appropriate, and by preventing pollution sources and pollution pathways which arise from or cross the development site, from entering the watercourse. In addition add to RJ a new paragraph after paragraph 12.26 (was paragraph 12.25): The policy requires consideration to be given to environmental betterment and improved access. Where space allows, best practice is to provide	

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		an 8-10 metre setback from the top of the riverbank. 8m relates to operational access and 10m is in relation to BNG. Within Manchester this aspiration will not always be feasible, but developers should still consider what improvements they can bring to the existing river corridor.	
	Natural Flood Management and River Valleys		
4	West Didsbury residents agree with naturalising river courses wherever possible and with nature based flood management	Support noted	LP263-2.
5	Mersey West Didsbury Residents strongly suggest that land behind the Hollies (Mersey Road) should be designated as an open green space, natural flood basin and biodiversity area	No change proposed to the plan. This site is currently Green Belt and therefore subject to green belt planning restrictions. It is already within Flood Zone 3. Part of the site (excluding the Britannia Hotel and associated car park) is identified in the GM Local Nature Recovery Network as a nature recovery opportunity area, where action for nature is considered to have the greatest potential. Both the GM LNRS and the draft Manchester Local Plan also require all proposed development across Manchester to improve biodiversity or mitigate any adverse impacts on biodiversity. No further designation is therefore considered appropriate.	LP263-2.
6	Ryebank Fields should be included in the plan as it provides much needed drainage for the surrounding	No change proposed to the plan. Policy EN2 is a thematic rather than site specific policy that sets out	LP18-3.

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	land. There are many problems with drainage under the houses surrounding the fields with surface water under the houses regularly occurring	the principles that development proposals will need to have regard to.	
7	A refinement of the River Valley Boundary to exclude Alder Farm is requested.	No change proposed to the plan. There is insufficient housing demand to warrant a change to the river valley boundary, but this will be further considered at the 25/26 SHLAA Update.	LP10-1; LP327-1.
8	There is no mention of the need to protect the groundwater that is a vital contributor to the baseflow of the city's rivers.	No change proposed to the plan. Policies EN2, EN8 and EN9 cover the need to use appropriate water management systems to improve water quality and prevent pollution. Ground water abstraction is dealt with under separate legislation.	LP29-20.
9	For all river valleys in Manchester, proactively explore opportunities afforded by new development and/or regeneration activities (including Biodiversity Net Gain activities).	Comment noted.	LP29-20.
	Biodiversity and Ecology		
10	There needs to be biodiversity policy for both the river Mersey and green areas nearby which acknowledges the value of standing and fallen dead wood and hedgerows as an important ecological asset	Comment noted. The Local Plan does not set out how individual sites should be managed for biodiversity. However, Policy EN4 requires all development to support the priorities and actions for nature set out in the GM LNRS, these include consideration of large and small scale interventions.	LP263-2.
11	Wherever possible ponds should be encouraged in parks and golf courses to help promote riparian species such as dragonflies and amphibians	Comment noted. The Local Plan does not set out how individual sites should be managed for biodiversity. However, Policy EN4 requires all development to support the priorities and actions	LP263-2

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		for nature set out in the GM LNRS, these include consideration of large and small scale interventions. Ponds are listed as one of the priority habits within Manchester.	
12	Recreational routes in river valleys should NOT be artificially illuminated at night due to the highly detrimental impact on bats and other biodiversity, especially invertebrates.	No change proposed to the plan. The policy wording (bullet point 6) provides sufficient flexibility that takes account of the issue raised.	LP263-2
13	The Mersey Valley Trust welcomes and supports this policy but consider that the wording relating to the LNRS should be changed from 'have regard' to 'take account of'.	No change proposed to the plan. The change suggested would not conform with national policy and guidance.	LP291-26
	Tree Planting		
14	The Woodland Trust agrees with this policy but would welcome a specific mention of the important role that tree-planting can play along riparian corridors. It would reduce flood risk by slowing runoff and stabilising riverbanks, improve water quality by filtering pollutants and enhance biodiversity through connecting habitats.	Change agreed. Insert text shown in bold to Policy EN2 third bullet "Incorporate Sustainable Drainage Systems (SuDS), including tree planting , where appropriate and demonstrate the use of the SuDS hierarchy, including active consideration of nature based methods of managing water flows to increase permeability, improve surface water drainage, reduce flood risk and improve water quality.	LP312-4.
	Development and Regeneration.		
15	A clause could be added to clarify the application of the policy in relation to strategic regeneration sites that require a comprehensive approach to works to the River, based on experience delivering the new park at Mayfield	No change proposed to the plan. The suggested clause could introduce confusion in that it repeats some but not all of the bulleted requirements.	LP272-14.

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	“For strategic regeneration sites, proposals will be supported where they demonstrate sensitive integration of waterways, effective flood risk mitigation, and environmental enhancement, whilst ensuring the overall deliverability of the masterplan and wider regeneration objectives”		
16	CRT fully supports and endorses the provisions of a standalone policy given the prevalence of waterway corridors within the Local Plan area, but suggest the following addition: “Development adjacent to waterways will only be permitted if it can be demonstrated that it would not adversely impact on the structural integrity of the waterway or its related infrastructure and assets.”	Support noted. Change agreed. Add additional bullet point after first bullet point to read: Safeguard the structural integrity of the waterway and its related infrastructure and assets.	LP315-6.
	Infrastructure, Transport and Access		
17	Integration of SuDS / nature-based drainage is welcomed to reduce runoff and flood risk near SRN corridors. Proposals near SRN routes should consider interactions with highway drainage systems, as National Highways cannot allow new drainage outfall into SRN systems.	Support and comments noted. This is an operational issue that can be dealt with on a site-by-site basis.	LP321-44 (NH).
18	Support for walking / cycling along waterways aligns with sustainable transport objectives but should be coordinated with National Highways at intersections with SRN corridors.	Support noted. The Local Plan, alongside Places for Everyone, will form the development plan for Manchester. This issue is addressed through other policies in the plan. (Places for Everyone Policy JP - C8 sets out transport requirements for new development including the	LP321-44 (NH)

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		need for transport assessments where appropriate). Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole	
19	The TPT / NCN follows or is in close proximity to waterways within Manchester and development proposals should enhance access, safety and connectivity along these corridors	No change proposed to the plan. The TPT/NCN is included - see 5th bullet point in Policy EN1 and the Policies Map.	LP365-15
20	Ensure that routes along rivers and canals are safe and accessible for disabled people	No change proposed to the plan. Accessibility is covered by Policy DM1 which states that buildings and neighbourhoods must be fully accessible to disabled people, any further amendments, considered necessary, will be made to this policy.	LP385-34
	Heritage and Placemaking		
21	We welcome the requirement for development to have regard to the important historical and cultural role that the river valley and canals play in place shaping, including the conservation and enhancement of canal infrastructure, bridges and aqueducts.	Support noted	LP318-24 (HE)
22	The river in this part of Castlefield (Medlock / New Elm Road) is an absolute mess. Need to take a 'blue and green first' approach to the masterplan and incorporate greenery first as seen at Mayfield Park. We are not anti-development; we just want it done right in Castlefield.	This is an operational matter and beyond the scope of the Local Plan	LP360-4.
23	Lacks Castlefield-specific placemaking, stewardship, or event strategy, including specific	Change agreed.	LP374-14

	Respondents comments	MCC Response	Respondent ID
	mention of Castlefield's unique canal junction (Rochdale and Bridgewater), protection and enhancement provisions, and public realm improvements along waterways in Castlefield.	Insert an additional bullet point after bullet point 2 under EN2 Rochdale, Ashton and Bridgewater Canals to read Utilise the heritage value of the canals, associated locks and canal basins to create a locally distinctive sense of place and enhance the public realm. Placemaking stewardship and event strategy are beyond the scope of the Local plan.	

Question No 46 - Trees and Woodlands

Do you agree with this policy? Yes (12) In Part (7) No (0)

Yes (LP385-35, LP321-45, LP315-17, LP309-44, LP305-18, LP299-13, LP297-19, LP291-27, LP290-13, LP267-31, LP28-46, LP27-31)

In part (LP395-15, LP374-16, LP272-15, LP263-1, LP261-5, LP9-1, LP2-6)

	Respondents comments	MCC Response	Respondent ID
	Canopy Cover and Street Trees		
1	Major residential and commercial development should be designed to meet targets of an agreed percentage increase in tree canopy cover based on a locally defined baseline.	No change proposed to the plan. The Policy uses the Greater Manchester based target for tree canopy cover and, in line with Manchester specific evidence, introduces higher tree replacement requirements for those wards with lower current tree cover.	LP325-10 (NE)
2	The Woodland Trust sees lots of positives in this policy and would encourage the use of the Tree Equity Score (TES) to identify neighbourhoods where tree planting would be most beneficial.	Support and comment noted. Manchester has a detailed ward level evidence base that identifies the neighbourhoods that would benefit most and from which type of planting. The principles that underpin the TES were considered and explored through our work. Change agreed. Additional text at the end of paragraph 12.33 (was paragraph 12.31)	LP312-5

	Respondents comments	MCC Response	Respondent ID
		“Developers can also use The Equity Score (TES) https://uk.treeequityscore.org/ which has been developed by the Woodland Trust and partners. This identifies specific neighbourhoods, or LSOAs, within wards across the city where tree planting would be most beneficial, with the areas with the lowest scores prioritised.”	
3	Withington Civic Society agrees with the policy and would like to see more street trees planted and replace street trees already lost particularly on the Hartley Estate.	Support and comment noted.	LP297-19
	Conservation Areas, Heritage and Designations		
4	We welcome the requirement that proposals to remove a tree within a Conservation Area be fully justified, especially where it makes a positive contribution to the significance of the Conservation Area.	Support noted.	LP318-25.
5	Ancient woodland simply cannot be mitigated for if it is lost and the draft plan needs to protect all ancient woodland in Greater Manchester including Davenportgreen ancient woodland.	Comment noted. Ancient Woodland within Manchester is covered by Policy EN3, however, Davenport Green Ancient Woodland is in Trafford.	LP263-1
	Tree Retention, Loss and Replacement		
6	A two for one policy is not adequate to compensate for the rich interconnected ecology of a stand of trees. The age of the trees should be taken into account in balancing and accounting for the	Comment noted. The policy does not only depend on a 2 for 1 replacement but also requires the existing trees to be valued using a CAVAT type	LP395-15

	Respondents comments	MCC Response	Respondent ID
	development need and wherever possible designing around them prioritised.	system which takes age, size, condition etc into consideration.	
7	Introduce a ‘retain and design around mature trees’ rule for all new developments to prevent unnecessary felling and preserve existing canopy cover.	No change proposed to the plan. The policy requires that trees be retained and designed into the scheme. There will be occasions which necessitate the removal of a tree, however, the policy requires any removal to be fully justified and replacement planting reflect the value, size, condition etc of the existing tree.	LP384-5
8	Requiring 2/3 new trees per tree lost on site especially for small brownfield sites is not deliverable or realistic and could compromise sustainable development and is therefore contrary to NPPF.	No change proposed to the plan. The policy is in line with NPPF which seeks to ensure new tree planting in appropriate locations and that existing trees are retained where possible. PfE already requires 2 for 1 planting and Policy EN3 only requires 3 for 1 within seven wards where existing tree levels are significantly below the City average. The policy wording provides sufficient flexibility that takes account of the issue raised	LP306-5.
9	The HBF is concerned by the potential tree replacement strategy provided, including implications for viability, efficient land use, site density, site layout and highways considerations.	No change proposed to the plan. The policy is in line with NPPF which seeks to ensure new tree planting in appropriate locations and that existing trees are retained where possible. PfE already requires 2 for 1 planting and Policy EN3 only requires 3 for 1 within seven wards where existing tree levels are significantly below the City average. The policy wording provides sufficient flexibility that takes account of the issue raised.	LP269-14

	Respondents comments	MCC Response	Respondent ID
10	City of Trees consider this policy is comprehensive, however where mature large canopy trees are lost the following should be stated: “semi mature equivalent canopy forming species trees with a minimum girth of 20/25cm at 1.5m height above ground.”	Change agreed. Addition proposed to 8th paragraph: Where tree loss or damage is proposed to allow for appropriate development, all existing trees above 7cm in diameter at 1.5m height shall be assessed by using an agreed valuation tool, e.g. the CAVAT Full Method, and the assessment submitted with the planning application. The size of the trees being planted should reflect the size of the trees being removed. The value of the trees lost will form the starting point for discussions on replacement trees. Also add into “Why this policy?” Paragraph 12:39 (was paragraph 12.36): The use of the Capital Asset Value for Amenity Trees (CAVAT) Full Method or similar valuation tool provides a suitable mechanism to determine the appropriate level of mitigation where loss of trees is proposed as part of development. As an example, where mature large canopy trees are lost, semi mature equivalent canopy forming species trees with a minimum girth of 20/25cm at 1.5m height above ground could provide an appropriate mitigation.	LP259-1
11	Strongly support the policy including replacing trees which fail on development sites within 10 years.	Support noted	LP263-1
	Existing and Approved Developments / S106		

	Respondents comments	MCC Response	Respondent ID
12	The provisions of this policy are welcomed, but they only apply to new developments whereas a number of existing or approved developments have no such provisions. Where both parties agree S106 agreements can be revisited to explore the application of this provision retrospectively.	No change proposed to the plan. Revisiting existing S106 agreements relating to planning approvals is beyond the scope of the Local Plan	LP2-6, LP281-9, LP311-11, LP358-10, LP374-16.
13	There needs to be a provision to open up S106 discussions with the stalled developments off Ellesmere Street.	No change proposed to the plan. Revisiting existing S106 agreements relating to planning approvals is beyond the scope of the Local Plan	LP2-6, LP281-9, LP311-11, LP358-10, LP374-16
	Design Standards and Protection		
14	See the standards for urban trees in Design for Access Two.	Design for Access 2 was produced in 2003. It set out the City's aspirations for inclusive development. It was intended that the standards in Design for Access 2 should be used for all buildings and projects on which Manchester City Council lead or are the client, for the maintenance and improvement of highways, and for all development on City Council disposal sites. As acknowledged by the Manchester Disabled Peoples Action Group, the document is in need of updating to reflect changes to legislation and policy since 2003. The document is not a statutory planning document and whilst parts of the document are still useful as a manual for architects, planners, engineers, landscape architects and other designers, it is not	LP385-35

	Respondents comments	MCC Response	Respondent ID
		appropriate to embed it into statutory development plan policy.	
15	BS5837 complaint tree protection needs to be imposed and checked on the ground by planners on development sites.	Comment noted. Landscape requirements would normally be the subject of planning conditions. Enforcing planning conditions is a statutory requirement.	LP263-1
16	Planners need to check the site on Google Earth going back at least 10 years and then require full replacement where trees were pre-emptively felled	Comment noted. The issue raised would not conform with national policy. Replacement tree planting is, however, already required for unlawfully felled trees covered by a Tree Preservation Order or in a Conservation Area. Similarly, when considering BNG intentional felling since 2020 can also be taken into consideration.	LP263-1
	Location, Context and Appropriate Species		
17	Several sites around Castlefield identified as suitable for more tree-planting.	Comment noted. Policy EN3 supports additional tree planting across the City.	LP360-3
18	Tree planting needs to be appropriate to its context. Sycamore trees on Nutsford Vale are not appropriate and should be replaced by “Ginkgo Balboa” or “Japanese Maple”.	No change proposed to the plan. Policy EN3 refers to the need for appropriate tree planting, in terms of size, species and placement.	LP261-5
19	The plans set out look good, but developments should not rely heavily on “commensurate financial contribution” and new planting; it is extremely important that areas of nature are linked and that there are mature trees and established, wilder areas.	Support and comment noted. Policy EN3 refers to the protection and improved management of existing trees and Policy EN4 refers to improving connectivity of habitats.	LP299-13
	Development		
20	Landsec agrees with the Trees and Woodlands policy and would welcome a balanced and flexible	Support noted. The policy allows for appropriate flexibility where this can be fully justified.	LP272-15

	Respondents comments	MCC Response	Respondent ID
	approach to tree retention and buffer zones on strategic regeneration sites.		
21	Network Rail supports the recognition that there may be exceptional circumstances where the loss of trees may be acceptable where justified, to balance safety, performance, and environmental outcomes.	Support noted.	LP268-8
22	Trees / woodland may provide indirect SRN benefits, but planting schemes should consider visibility, root spread and maintenance access.	Comment noted. The policy wording refers to the need for street tree planting to be subject to practical considerations.	LP321-45
23	MA is supportive of the approach to green and blue infrastructure but there is a requirement to safeguard aviation safety where proposals may attract birds.	Comment noted. This issue is dealt with under Policy DM8. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP305-18
	Biodiversity and Air Quality		
24	It would be good to be explicit about the role trees play in combating air pollution and helping make progress towards meeting good air quality targets.	The benefit of green infrastructure, including trees, in improving air quality is referenced in the explanation to policy EN1 Strategic Green Infrastructure. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP267-31
25	The Trust agrees with and supports this policy and recommends that native trees of local provenance and characteristics of the area should be selected.	Comments noted. Change agreed. Addition proposed to Section 19 Appendix B Tree planting Guidance, second bullet point to read Native tree species should be considered and all trees should be sourced from a UK nursery with a robust biosecurity policy.	LP291-27
	Sport and Recreation		
26	Sport England would not support any landscaping proposals which would result in the loss of playing	Comment noted. This issue is dealt with under Policy SI 1. Where other policies in the Local Plan	LP9-1

	Respondents comments	MCC Response	Respondent ID
	field land or sports facilities and any such proposals will need to meet NPPF paragraph 104.	deal with these matters they are not repeated as the plan should be read as a whole.	
27	Sport England strongly recommend the inclusion of reference to the principles of Active Design guidance.	No change proposed to the plan. Policy SI2 references Sport England technical Design Guidance. Sport England's Active Design guidance covers a range of principles of wider relevance than the provision of new open space, sport and recreational facilities. Many of these principles are already picked up under other policies such as EN1 and T1.	LP9-1

Question No 47 - Biodiversity and Geodiversity

Do you agree with this policy? Yes (8) In Part (7) No (0)

Yes (LP385-36, LP321- 46, LP309-45, LP305-19, LP291-28, LP267-32, LP28-47, LP27-4)

In part (LP395-16, LP299-14, LP263-3, LP261-6, LP257-1, LP253-1, LP9-43)

	Respondents comments	MCC Response	Respondent ID
1	Good to see this linked with the GM LNRS and the Manchester Biodiversity Strategy.	Support noted	LP28-47
2	Policy EN4 - Biodiversity and Geodiversity seems an appropriate standard policy and we support its inclusion. The policy links to Greater Manchester Local Nature Recovery Strategy.	Support noted	LP312-6, LP315-18
3	Totally endorse this Policy even though it doesn't affect Collyhurst.	Support noted	LP309-45
4	Very much welcome all of the content of this Policy (and supporting notes).	Support noted	LP29-22
5	Requests this policy includes: The inclusion of swift bricks or nest boxes in new buildings and renovations to provide secure nesting sites.	Change agreed. Addition to third bullet point after the wording “All developments, whether or not they impact sites or areas identified within the GM Local Nature Recovery Strategy, should demonstrate the following: • The way in which the design and layout of the development will enhance biodiversity, from including large-scale interventions e.g. wildflower meadow creation, to and small scale interventions e.g. swift/bat bricks; “	LP263-3, LP299-14, LP347-1, LP356-1, LP370-2, LP371-1

	Respondents comments	MCC Response	Respondent ID
6	Requests this policy includes: The protection and promotion of green corridors along rivers and urban areas to support insect populations, which are a key food source for swifts and other wildlife	No change proposed to the plan. Policy EN1 requires development to have regard to the priorities and actions set out in the GMLNRS which sets out practical actions for target species which includes swifts.	LP299-14, LP370-2
7	Requests this policy includes: The implementation of sustainable practices and reduction of urban heat islands to ensure a healthy environment for swifts as temperatures rise	No change proposed to the plan. The implementation of the environment policies contained within the Local Plan will together help reduce the urban heat island effect.	LP370-2
8	Requests this policy includes: The involvement of local communities in monitoring swift populations and raising awareness through citizen science projects and educational programs.	No change proposed to the plan. This is beyond the scope of the Local Plan.	LP370-2
9	Requests this policy includes: The use of non reflective glass in high rise buildings to avoid bird strike.	No change proposed to the plan. Policies SP2 and DM1 provide sufficient policy detail covering the effects on natural resources and biodiversity.	LP370-2
10	New buildings should include a minimum provision for habitats that goes beyond Biodiversity Natural Gain	No change proposed to the plan. The change suggested would not conform with national policy and guidance.	LP347-1, LP356-1
11	Would like to see recognition in Section 12: Environment of the City's buildings and their estate as potential habitats for flora and fauna.	No change proposed to the plan. All applications for development will be considered against the Local Plan policies regardless of the land or building owner.	LP371-1
12	Maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows	No change proposed to the plan. Policy EN3 recognises the importance of tree planting along roads subject to practical considerations e.g.	LP345-5

	Respondents comments	MCC Response	Respondent ID
		visibility and driveway access, sufficient pavement width.	
13	NV is biodiverse from records that GM LNRS made historically. Formal walkarounds were taken where 10 species of plants, 10 species of birds and 10 species of trees were recorded each time. HOWEVER it is NOT shown as an “opportunity area” and it SHOULD BE. Please make it an “opportunity area” with a view to becoming an SBI.	No change proposed to the plan. The identification of a site as an “opportunity area” within the GM LNRS is separate to the Local Plan process. However, sites outside the GM LNRS mapped “opportunity areas” are still required to consider how they can enhance and connect existing habitats and create new habitat.	LP261-6
14	Ryebank Fields should be recognised and valued as an opportunity area with potential as a Local Nature Reserve. We believe the exclusion of this site is not in accordance with the Government Guidance, which suggests only spaces under construction need be excluded, which this is not.	No change proposed to the plan. The identification of a site as an “opportunity area” within the GM LNRS is separate to the Local Plan process.	LP395-16
15	Note the policy wording does not include specific reference to priority habitats and species aside from designated sites and irreplaceable habitats. The Plan should protect irreplaceable habitats (including ancient woodland and ancient and veteran trees) from loss or deterioration and seek their enhancement wherever possible. It should also protect and enhance priority habitats and species. This should include appropriate protection and restoration of deep and shallow peatlands, found in fen and bog priority habitats that are valuable for	Policy EN4 protects irreplaceable habitats and designated sites and seeks their enhancement. With regard to priority habitats and species, changes are proposed to the policy wording as follows: “All developments, whether or not they impact sites or areas identified within the GM Local Nature Recovery Strategy, should demonstrate the following:” with “All developments should demonstrate the following having regard to the	LP325-11 Natural England

	Respondents comments	MCC Response	Respondent ID
	biodiversity and as a carbon store. Other priority habitats include upland and lowland heathland, traditional orchards, meadows, woodlands and coastal habitats. Whilst Natural England support the reference to LNRS, the current draft wording does not emphasise having regard to LNRS as per the planning practice guidance (PPG) and only references mapped actions in the LNRS. In line with the PPG requirement to have regard to LNRS, Natural England recommend the text is amended to <i>'All developments should demonstrate the following having regard to the GM Local Nature Recovery Strategy relevant mapped and unmapped actions for that location'</i> rather than <i>'All developments, whether or not they impact sites or areas identified within the GM Local Nature Recovery Strategy, should demonstrate the following'</i>. There are a range of bespoke actions for a variety of species in the GM LNRS that could benefit from development where regard is given to LNRS species actions (especially around the urban birds assemblage, for example). The bullet list outlining how all developments can demonstrate actions in the LNRS could reference relevant species actions alongside the habitat actions. This could be achieved through a further bullet in the final bullet list that references demonstrating: <i>'The opportunities for design and construction to accommodate specific bespoke species actions outlined in LNRS.'</i>	GM Local Nature Recovery Strategy relevant mapped and unmapped actions for that location" Change also agreed to add a final 5th bullet point to read "The opportunities for design and construction to accommodate specific bespoke species actions outlined in LNRS." Change also agreed to insert "Protecting and enhancing habitats will in turn benefit and help protect species." at the end of first paragraph of the policy explanation	

	Respondents comments	MCC Response	Respondent ID
16	Development near/adjacent to the SRN may have indirect implications where habitats intersect SRN corridors. Where SRN-adjacent land is involved, coordination with National Highways may help align ecological improvements with transport infrastructure planning.	No change proposed to the plan. This is an operational matter that can be dealt with at the appropriate time when ecological and highways matters coincide.	LP321-46 National Highways
17	MA is supportive of the approach to green and blue infrastructure and the natural environment, and the range of policies (EN 1 - EN 6) that seek to improve this network and enhance biodiversity, ecological and landscape value. Notwithstanding this, there is a requirement to safeguard aviation safety when considering any proposal that may attract birds as this could lead to an increase in bird-strike risk. Such proposals include significant areas of landscaping and the creation or modification of water bodies. Aviation safety must be addressed in the determination of planning applications for such schemes within 13km of Manchester Airport, and the Aerodrome Safeguarding Authority for Manchester Airport would need to be consulted as statutory consultee in accordance with the legislative provisions set out in Circular 1/2003 – Safeguarding Aerodromes, Technical Sites and Military Explosive Storage Areas. Proposals that adversely impact on aircraft safety should not be supported. This could apply to all policies within this section of the Local Plan, and in particular to Policy EN 1 (Strategic Green and Blue Infrastructure),	Support noted. Aviation safety is addressed by Policy DM9. Where other policies in the Local Plan deal with an issue it is not repeated as the plan should be read as a whole.	LP305-19 Manchester Airport

	Respondents comments	MCC Response	Respondent ID
	Policy EN 3 (Trees and Woodlands), Policy EN 4 (Biodiversity and Geodiversity), Policy EN 5 (Biodiversity Net Gain), and Policy EN 6 (Urban Green Factor).		
18	Agree that development should seek to support and deliver on the priorities and actions for nature recovery that are set out in the Greater Manchester Local Nature Recovery Strategy. Especially welcome the acknowledgement that there are specific species, outlined within the LNRS, that require specific conservation effort. It should be made clear that where development impacts the habitats or specific requirements of these species that the practical actions required to assist their recovery are taken into account and that appropriate mitigation or where required, compensation is delivered that will ensure that the populations of the species impacted will survive and flourish. Agree that all development, whether or not they impact sites or areas identified within the GM Local Nature Recovery Strategy, should demonstrate: -the expansion and enhancement of existing habitats, strategic creation and restoration of habitat to better connect existing habitats, the ways in which the design and layout of the development will enhance biodiversity, and, mitigate the impact of any infrastructure that could be detrimental to achieving enhanced biodiversity connectivity. Recommend that the following paragraph be added as an advisory	Support noted. Change agreed. Proposed change to wording of Policy EN4 “Why this Policy?” to add the following at the end of paragraph 12.40 - “Development should be viewed as the mechanism that helps to drive nature’s recovery. It is expected that development should leave nature in a better state ‘post-development’, by not only seeking to protect existing biodiversity assets, but also by enhancing and improving the connectivity of the landscape for habitats and species.”	LP291-28

	Respondents comments	MCC Response	Respondent ID
	note on what is expected of development regarding their duty to protect and enhance biodiversity. ‘Development should be viewed as the mechanism that helps to drive natures recover. It is expected that development should leave nature in a better state ‘post-development’, by not only seeking to protect existing biodiversity assets, but lead to the enhancement and better connectivity of the landscape for habitats and species.’		
19	Strong emphasis on avoiding harm to designated sites and irreplaceable habitats ensures developments contribute to ecological sustainability—a positive for long-term community health. Linking development to the Greater Manchester Local Nature Recovery Strategy encourages green infrastructure and habitat connectivity, which can improve residents’ well-being and mental health. Encourages practical interventions like green roofs, living walls, and wildlife bricks, which can be incorporated into affordable housing schemes to enhance quality of life. Requirements for habitat creation and green infrastructure may increase costs for affordable housing providers, who already face tight budgets. Without financial support, these measures could reduce the number of affordable units delivered. Policy promotes habitat connectivity and green space, but affordable housing often needs higher densities to meet demand. Balancing biodiversity	Support noted. The policy provides sufficient guidance to consider issues on a case-by-case basis in any development proposals. The policy should also be read alongside others in the Local Plan. Policy EN6, for example, provides flexibility on the different types of green infrastructure that can be used depending on the individual character of the site and development. MCC is aware that there is a disparity in access to green space/GI across the City. Policy EN3 seeks to address this with regard to tree planting and Policy SI1with regard to open space provision. The provision of grants or incentives to provide GI within certain types of development and the detailed management arrangements for individual developments is beyond the scope of the Local Plan.	LP278-22

	Respondents comments	MCC Response	Respondent ID
	with compact development is challenging. Policy focuses on ecological outcomes but does not address how benefits (e.g., access to green space) will be distributed. Affordable housing residents risk being excluded from high-quality green infrastructure if not mandated. Features like living roofs and biodiversity enhancements require ongoing maintenance. Affordable landlords may struggle to fund this, risking deterioration and loss of intended benefits. Introduce grants or incentives for biodiversity measures in affordable housing schemes. Mandate that affordable housing residents have equal access to green spaces and nature-based amenities. Provide clear standards for integrating biodiversity in compact developments. Encourage partnerships with local groups for maintaining green infrastructure.		
20	Network Rail supports the recognition in these draft Policies that there may be exceptional circumstances where the loss of trees, woodlands and other biodiversity features may be acceptable where justified. This aligns with the need to balance the protection of biodiversity features, trees and hedgerows etc, with the operational requirements of Network Rail, as set out in Network Rail's Biodiversity Action Plan. Network rail's BAP aims to strike a balance between safety, performance, and environmental outcomes. The importance of the railway for biodiversity and nature protection, is fully	Support noted.	LP268-9 Network Rail

	Respondents comments	MCC Response	Respondent ID
	recognised, and supported by Network Rail. There is however a need to ensure the best balance between biodiversity objectives and the ability to maintain and improve the railway to keep it running safely and smoothly. It is not always safe or practical to avoid all impacts on existing sites features as part of this balance, and in situations where certain on-site impacts are unavoidable, Network Rail will seek to create appropriate habitats and enhance nature elsewhere, (in the local area where possible), to mitigate for and offset any impacts, also having regard to national legislative requirements.		

	Respondents comments	MCC Response	Respondent ID
21	Recognise the constraints imposed on the Council by Places for Everyone and NPF. Would like to see some joining up of policy areas eg encouragement to include biodiversity gain in the structure of buildings. Would like to see small spaces in neighbourhoods acknowledged. The background strategy has little to say about these. Ryebank Fields in Chorlton should be named as a local area of nature recovery.	Comments noted. The potential for incorporating small scale habitats e.g. swift/bat bricks and green infrastructure e.g. green roofs and walls within buildings, is recognised in Policy EN4 and Policy EN6. The Open Space assessment excludes sites below 0.2ha except for parks and play areas, so as not to place too much reliance on small spaces such as grass verges in considering how much open space provision there is across the City. However, this does not mean that these sites are unimportant and under Policy SI1 a planning application for such a site would still require an open space assessment to judge whether it was surplus. The identification of a site as an “opportunity area” within the GM LNRS is separate to the Local Plan process.	LP267-32
22	Protection for SBIs against the potential long term harm of development needs to be strengthened considerably by this policy. The potential long term impacts of development in / close to SBIs needs to be considered far more carefully and long term safeguards put in place. At the moment SBIs have very little protection and are very vulnerable to being damaged. Please include the suggested wording- “Manchester recognises that SBIs are very important to conserving local biodiversity -stringent long term	Comments noted. The management of an SBI typically lies with the site owner or occupier. Change agreed. Addition proposed to Policy DM1 Development Management, 10th bullet to read “Effects relating to biodiversity, including habitat and species protection, landscape, archaeological or built heritage.”	LP263-3

	Respondents comments	MCC Response	Respondent ID
	safeguards to prevent development harming their conservation value in any way need to be imposed. The construction of home extensions and other structures near to an SBI will require special planning consideration and oversight. Potentially increased access to an SBI should be mitigated by safeguards to its nature conservation such as restriction to footpaths and avoidance of artificial lighting. Sympathetic long term management of SBIs needs to be ensured by means of rigorous oversight of any conditions imposed.”		
23	12.12 Map of Manchester’s designated biodiversity value - Please include Davenportgreen ancient woodland SJ 804860 off Brooks Drive together with its buffer zone of surrounding fields and hedgerows in the map of designated biodiversity value sites. Davenportgreen woodland is listed in the Natural England Inventory of ancient woodland- it has a brook running through it and all the ground flora typical of ancient woodland is present. Davenport green wood should be considered as a biodiversity asset integral to the Manchester’s nature recovery network as well as the blue and green infrastructure network.	Comment noted. Ancient Woodland within Manchester is covered by Policy EN3, however, Davenport Green Ancient Woodland is in Trafford.	LP263-3
24	Bat bricks and bat tiles need to be provided in new build and refurbishments.	Comment noted. Policy EN4 requires all developments to demonstrate the way in which the design and layout of the development will enhance biodiversity, from larger scale interventions e.g.	LP263-3

	Respondents comments	MCC Response	Respondent ID
		wildflower meadow creation, to small scale interventions e.g. swift/bat bricks.	
25	Ponds with a mud edge should be provided in areas where house martins have historically nested.	Comment noted. The need for all developments to consider the actions identified within the GM LNRS (and which includes the creation of bog gardens to encourage house martins), is referred to within Policy EN4	LP263-3
26	Priority species such as hedgehogs often live outside designated sites of biodiversity value like parks and gardens. This needs to be acknowledged in the plan and underlines the need for robust green infrastructure linkages throughout the urban and suburban landscape.	Policy EN4 is being amended to clarify that “All developments should demonstrate the following having regard to the GM Local Nature Recovery Strategy relevant mapped and unmapped actions for that location” This is followed by a bulleted list that includes the need for biodiversity connectivity.	LP263-3
27	The reference to swift bricks in Policy EN4 is welcome; but it currently falls short of national policy guidance with regard to numbers required. Please include the text from NPPG Natural Environment 2025 paragraph 017 (https://www.gov.uk/guidance/natural-environment), especially with regard to: at least one swift brick per dwelling on average for new developments, swifts bricks are a universal nest brick for a range of small bird species, include the guidance references from the NPPG. Existing nest sites should be protected and retained. An alternative to swift bricks	No change proposed to the plan. Policy EN4 refers to small scale interventions such as swift/bat bricks. It is not necessary to repeat information contained within the National Planning Policy Guidance as this is already a material consideration in planning application decisions.	LP253-1, LP257-1

	Respondents comments	MCC Response	Respondent ID
	is artificial nest cups for House Martins where recommended by an ecologist.		
28	Sport England would not support proposals which would result in loss of playing field land or sports facilities, this policy wording is not considered to be strong enough to 'protect' existing facilities. Any such proposals will potentially need to meet the requirements of NPPF paragraph 104. Sport England has provided comments as part of the consultation process with regard to the GM LNRS on this basis. Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions; creation of wetlands; restoration of peatlands; planting of trees and hedgerows; more sustainable management of existing woodlands and other habitats like grasslands.	Comment noted. This issue is dealt with under Policy SI 1. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP9-43

Question No 48 - Biodiversity Net Gain

Do you agree with this policy? Yes (6) In Part (10) No (0)

Yes (LP385-37, LP321-47, LP309-46, LP305-20, LP27-1, LP20-9)

In part (LP395-17, LP300-11, LP299-15, LP292-23, LP272-16, LP267-33, LP263-4, LP261-7, LP28-48, LP9-34)

	Respondents comments	MCC Response	Respondent ID
	Equivalence		
1	The plan assumes equivalence for the replacement of destroyed biodiversity; this is an unsupportable assumption given the complexity of ecosystems. They cannot just be recreated, 'just like that'.	No change proposed to the plan. The mandatory Defra Biodiversity Metric takes account of both the difficulty of creation or enhancement and the time it takes a habitat to reach its target condition.	LP28-48, LP292-23 LP395-17
2	The economic logic of exchange is not fit for the purpose of biodiversity protection and conservation, either conceptually or methodologically.	No change proposed to the plan. Biodiversity Net Gain is governed by national regulations that the Local Plan cannot alter.	LP292-23
3	A far stronger policy is required with a presumption against development unless it can be shown that there will be no damage.	No change proposed to the plan. The change proposed would not conform with national policy and guidance. The policy does, however, prioritise biodiversity being retained on site.	LP292-23, LP395-17
4	Development on nature spaces should require a presumption against unless there will be no damage; given the excess of brownfield and deficit of nature spaces.	No change proposed to the plan. The change proposed would not conform with national policy and guidance. This policy should be read alongside Policy SI1 which also gives protection to open spaces.	LP395-17
	BNG hierarchy and application		

	Respondents comments	MCC Response	Respondent ID
5	The BNG hierarchy is reasonable, but the application is crucial; it is meant to be used only when development is unavoidable.	Comments noted. This point is addressed within the policy and policy explanation, which says. “This policy should be read in conjunction with Policy EN4 and the Greater Manchester Local Nature Recovery Strategy. The hierarchy of seeking to avoid, mitigate and compensate habitat loss should be considered during site selection and in the early design stages of any development. The requirement to provide BNG does not override the mitigation hierarchy, or other legal requirements around protected species or priority and irreplaceable habitats”.	LP395-17
6	There is no implication that compensation should enable unfettered habitat destruction.	Comments noted. This point is addressed within the policy and policy explanation, which says. “This policy should be read in conjunction with Policy EN4 and the Greater Manchester Local Nature Recovery Strategy. The hierarchy of seeking to avoid, mitigate and compensate habitat loss should be considered during site selection and in the early design stages of any development. The requirement to provide BNG does not override the mitigation hierarchy, or other legal requirements around protected species or priority and irreplaceable habitats”.	LP395-17
7	Stronger requirements are needed for developers to show how they cannot meet biodiversity gain on site.	No change proposed to the plan. Biodiversity Net Gain is governed by national regulations which includes the mandatory use of the Defra Biodiversity Metric, that the Local Plan cannot alter.	LP267-33
	On-site, off-site and location issues		

	Respondents comments	MCC Response	Respondent ID
8	Off site, but as near to the development site as possible, within Manchester District and the Greater Manchester Local Nature Recovery Area.	Comment and support noted.	LP20-9, LP395-17
9	Include wording for what will happen if it is not possible to 'compensate' nature space within walking distance of the community.	No change proposed to the plan. Policy EN5 makes it clear that as far as possible, Biodiversity Net Gain is to be provided on site. It then sets out the BNG hierarchy against which the location of any off-site provision will be assessed.	LP395-17
10	Off site biodiversity gain gives developers carte blanche to ignore biodiversity gain within developments and is impossible for local people to monitor.	No change proposed to the plan. Policy EN5 requires developers to consider on site biodiversity first and to provide full justification if they need to deliver their biodiversity requirements off site. National BNG regulations set out the requirements for monitoring off site.	LP267-33
11	On-site BNG delivery can provide stepping stones for wildlife to maintain porosity through densely populated areas.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole. This policy should be read alongside Policy EN4 which requires all developments to consider the enhancement of biodiversity.	LP291-29
	Species protection and habitat specifics		
12	Clarify provision for protected species such as bats, badgers and hedgehogs on constrained sites where relocation is not possible.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole. This policy should be read alongside Policy EN4 which sets out the mitigation hierarchy and the requirement for actions around protected habitats and species.	LP395-17

	Respondents comments	MCC Response	Respondent ID
13	Less mobile species require onsite habitat mitigation and continued habitat connectivity.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole. This policy should be read alongside Policy EN4 which sets out the mitigation hierarchy and the requirement for actions around habitat connectivity.	LP 263-4
14	Biodiversity within the built environment should be included (swift bricks, bat bricks) as well as natural habitats.	No change proposed to the plan. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole. This policy should be read alongside Policy EN4 which sets out the mitigation hierarchy and the requirement for actions around habitats and species.	LP263-4
	Design integration (SuDS, green infrastructure)		
15	Integrate SuDS with the wider design strategy at the earliest possible stage.	No change proposed to the plan. Policy EN5 refers to the need to consider the requirements of Policy EN6 at the earliest stage. Policy EN6 clearly also includes SuDS.	LP386-23
16	Consider Urban Green Factor Policy and ensure requirements are complementary from the outset.	No change proposed to the plan. Policy EN5 refers to the need to consider the requirements of Policy EN6 at the earliest stage. Policy EN6 clearly also includes SuDS.	LP386-23
17	BNG must not be located on top of, or where it would preclude access to, water and wastewater assets unless agreed.	No change proposed to the plan. This is covered by Civil Law.	LP386-23
18	Coordination with National Highways where SRN-adjacent land intersects ecological corridors.	No change proposed to the plan. This is an operational matter that can be dealt with at the appropriate time when ecological and highways matters coincide.	LP321-47

	Respondents comments	MCC Response	Respondent ID
	Monitoring, enforcement and delivery		
19	Include a section on how monitoring and enforcement will be managed.	No change proposed to the plan. The Policy set out the requirement for monitoring significant on site gains. The BNG system is governed by national legislation which requires habitat management and maintenance plans and sets out the process for securing and verifying gains, including off site provision.	LP324-6
20	Establish a clear framework including post-development habitat condition assessments and long-term management responsibilities.	No change proposed to the plan. The BNG system is governed by national legislation which requires habitat management and maintenance plans and sets out the process for securing and verifying gains.	LP324-6
21	Require habitat management and monitoring plans and mechanisms for securing and verifying gains (legal agreements or conservation covenants).	No change proposed to the plan. The BNG system is governed by national legislation which requires habitat management and maintenance plans and sets out the process for securing and verifying gains.	LP324-6
22	Developers need to be carefully monitored and held accountable if proposals are not fulfilled.	No change proposed to the plan. BNG requirements would be the subject of legally enforceable planning conditions or a legal agreement.	LP267-33
	Metrics, evidence and validation		
23	Developers should provide the post-development metric prior to determination; without it, it is difficult to determine if 10% BNG can be achieved.	No change proposed to the plan. The issue proposed would not conform with national policy and guidance which only requires this metric to be submitted and approved prior to development commencing.	LP291-29
24	Whilst full details of BNG delivery might not be required prior to determination, there needs to be a	Comment noted. The policy wording and explanatory text makes this clear - "Development	LP291-29

	Respondents comments	MCC Response	Respondent ID
	clear direct of travel indicated. Where developers only provide a list of possible routes for achieving the mandated 10% uplift, then more information would need to be provided by the developer.	proposals submitted for planning approval will be expected to include sufficient information e.g. in plans, drawings and/or a statement, to understand the proposed strategy for meeting the Biodiversity Net Gain requirement. Developers are also encouraged to engage in pre-application discussions”.	
25	Strong statement needed to ensure there really is gain and not paying lip service.	No change proposed to the plan. Policy EN5 together with national BNG legislation provide a clear statement on this.	LP299-15
	Policy structure, duplication and guidance		
26	Policies should not duplicate the statutory framework; the draft hierarchy should be deleted in favour of relying on PPG and statutory provisions.	No change proposed to the plan. The hierarchy does not deviate from the order of onsite, offsite and finally national credits, but sets any off-site provision within a Manchester specific context including the Greater Manchester Local Nature Recovery Strategy.	LP306-6
27	Policy should be reviewed and significantly condensed to avoid duplication.	Comment noted. Policy is being revised in the context of most recent regulations.	LP300-11
28	Planning application requirements should be in the validation list.	Comments noted. Elements of the policy that relate to the validation list have been moved to the policy explanation.	LP269-15 LP300-11,
29	Any consideration by the Council to the definition of significance must be pragmatic.	Comment noted.	LP306-6
30	BNG level and ambition Require 20% BNG rather than 10% to ensure meaningful improvement and resilient ecological	No change proposed to the plan. The change proposed would not conform with national policy and guidance.	LP312-7

	Respondents comments	MCC Response	Respondent ID
	networks. The cost for developers of moving from 0% to 10% BNG is higher than moving from 10% to 20%, meaning the additional uplift represents far better value for nature.		
31	10% often results in marginal enhancements and may not compensate for cumulative pressures	Comment noted. The requirement for 10% BNG has been set by national legislation.	LP312-7
	Costs, viability and delivery challenges		
32	Achieving BNG may increase development costs and affect viability, site coverage, densities, and affordable housing delivery.	No change proposed to the plan. The requirement for 10% BNG has been set by national legislation. The policy provides flexibility for developers who can justify where BNG cannot be delivered on site.	LP269-15 LP278-23
33	Non-mandatory BNG should be subject to viability and feasibility considerations.	Comment noted. Policy EN4 Biodiversity and Geodiversity covers the broader requirements around enhancing biodiversity. Proposed change to wording to remove the second to last paragraph of Policy EN5 Biodiversity Net Gain— “Developments that are exempt from national mandatory Biodiversity Net Gain and/or are on sites with a low initial biodiversity score, will still be expected to demonstrate an enhanced level of biodiversity, proportionate to the nature and scale of development and with reference to the documents included in this policy. The submission of a completed BNG Metric will not, however, be mandated in these circumstances.”	LP269-15
	Access, equity and community benefit		
34	Policy does not ensure biodiversity	No change proposed to the plan. The legislation underpinning BNG seeks to protect biodiversity	LP278-23

	Respondents comments	MCC Response	Respondent ID
	enhancements benefit residents directly or guarantee access to green space.	rather than guarantee access to green space. Policy EN5 prioritises the provision of BNG on site or as near to the site as possible which will also benefit local people.	
35	Whilst the aim that all residents of Manchester should have the right to access areas of high-quality natural greenspace is supported, BNG is the mechanism to enhance the natural environment and is a purely biodiversity-based metric. (paragraph 12.55) The main steer for the location of biodiversity off-setting should be based on the best outcomes for biodiversity.	No change proposed to the plan. The Defra Biodiversity Metric will define the type of biodiversity habitats that will need to be provided whether on site or off site, purely on ecological criteria. The policy allows, that where there is choice to be made, preference will be given to locations that also provide benefits for local people.	LP291-29
	Strategic alignment and partnerships		
36	Policy supports GM LNRS and ecological network, contributing to climate resilience, water quality and public health.	Support noted.	LP324-6
37	Canal & River Trust land/waterway could provide habitat subject to agreement.	Comments noted. The process for providing habitat is separate to the Local Plan.	LP315-19
	Safeguards and constraints		
38	Ensure sites are not cleared before ecology surveys are carried out.	No change proposed to the plan. National legislation allows consideration of habitat value prior to any unauthorised degradation that has occurred since 20 th January 2020.	LP263-4
39	Safeguard aviation safety where landscaping or water bodies may increase bird-strike risk.	No change proposed to the plan. Aviation safety is addressed by Policy DM9. Where other policies in the Local Plan deal with an issue it is not repeated as the plan should be read as a whole.	LP305-20

	Respondents comments	MCC Response	Respondent ID
40	Sport England would not support biodiversity net gain proposals which would result in loss of playing field land or sports facilities, this policy wording is not considered to be strong enough to ‘protect’ existing facilities.	Comment noted. This issue is dealt with under Policy SI 1. Where other policies in the Local Plan deal with these matters they are not repeated as the plan should be read as a whole.	LP9-34
	Additional opportunities		
41	Castlefield canal and viaduct ecology opportunity for pilot.	No change proposed to the plan. The process for creating a habitat bank is separate to the Local Plan.	LP360-18, LP374-17
42	Nutsford Vale Green Space funding via BNG categories.	No change proposed to the plan. The process for creating a habitat bank to provide off site biodiversity units that can be purchased, is separate to the Local Plan.	LP261-7

Question No 49 - Urban Green Factor

Do you agree with this policy? Yes (11) In Part (7) No (0)

Yes (LP395-18, LP385-38, LP321-48, LP309-47, LP305-21, LP299-16, LP291-30, LP290-14, LP263-5, LP28-49, LP27-5)

In part (LP300-12, LP272-17, LP267-34, LP261-8, LP23-11, LP16-5, LP9-14)

	Respondents comments	MCC Response	Respondent ID
	SuDS and Surface Water Management		
1	UUW welcomes this policy and the references within the policy to link the delivery of the Urban Green Factor to surface water management. One minor change is suggested: <i>"The linking of urban green features to the strategy for surface management and the integration of Sustainable Drainage Systems (SuDS). These shall be designed to comply with ..."</i>	Change agreed. Insert text in red "The linking of urban green features to the strategy for surface management and the integration of Sustainable Drainage Systems (SuDS). These shall be designed to comply with ..."	LP386-24
2	UGF can indirectly benefit the SRN through surface-water management, air-quality improvements and temperature regulation. Near SRN infrastructure, green features (permeable surfaces, tree planting, SuDS) should complement highway drainage and avoid visibility/access conflicts. Coordination with National Highways will be required where enhancements intersect SRN corridors or transport-led schemes.	Comment noted and ongoing engagement with National Highways will continue as requested and in accordance with PfE JP-C4.	LP321-48
	Equity		
3	Although the Manchester figure of 3.36 ha per 1,000 population is above the recommended figure of 3HA Green Space per 1000 population, it is badly	No change proposed to the plan. The supporting text to Policy SI 1 acknowledges that Manchester's publicly accessible open space is not distributed	LP261-8

	Respondents comments	MCC Response	Respondent ID
	distributed. There needs to be a tabulation of the Green space in each Council Ward for instance Gorton has at least 27,000 people which would require 81 HA of Green space.	evenly across the city and that Manchester's historic growth pattern and dense urban form means that it will not always be possible to increase the quantity of open space, even in areas where this may be desirable. This is also why Policy SI1 seeks to improve the quality and accessibility of existing open spaces as well as the quantity where possible. Assessing open space provision by ward can be misleading as open space, which is easily accessible, but which lies just beyond a ward boundary would be ignored e.g. Nutsford Vale lies just outside Levenshulme ward. The Open Space Assessment has considered the distribution of open space on an area basis - North, Central, South and Wythenshawe - rather than a ward basis, to help address this issue. The purpose of the Urban Green Factor policy is to ensure that even in the densest urban area, consideration is given to how appropriate green infrastructure can be incorporated into a scheme.	
4	There should be no net loss of green cover in urban neighbourhoods. Urban greening ought to be at least 40% average green cover in urban residential neighbourhoods where that standard is not already met.	Comments noted. The Local Plan acknowledges that Manchester's historic growth pattern and dense urban form mean that it will not always be possible to increase the quantity of open space, even in areas where this may be desirable. This is also why Policy SI1 seeks to improve the quality and accessibility of existing open spaces as well as the quantity where possible. Policy EN6 will help to ensure that even in the densest residential neighbourhood,	LP325-12

	Respondents comments	MCC Response	Respondent ID
		consideration is given on a site by site basis to achieving 40% green cover.	
5	Policy is supported but concerns it may be inequitable, could conflict with other priorities, may be expensive and could reduce the number of affordable units being delivered. Could be strengthened by funding incentives, flexible design solutions and requiring communal and accessible green space.	Support and comments noted. The Local Plan Policy EN6 Urban Green Factor does not prohibit communal and accessible green space being incorporated as part of a development scheme. The policy allows flexibility and innovative design solutions. Funding incentives are beyond the scope of the Local Plan.	LP278-24
	Viability, Flexibility and Deliverability		
6	The HBF notes that this policy seeks to apply a rigid formulaic approach to assessing the proportion and quality of green infrastructure. This approach may not be appropriate in all circumstances, and the implication of this policy needs to be fully taken into account in the whole-plan viability assessment in terms of its effect on net developable areas.	Comments noted. The Local Plan Policy EN6 Urban Green Factor allows flexibility and innovative design solutions. The extensive range of green infrastructure that can be used to achieve the appropriate score, and flexibility concerning its location on a site, allows solutions to be designed which suit individual development schemes.	LP269-16
7	The purpose and overall aim of this draft policy is supported, however, the standards and expectations of the policy may not be practically achievable on a case-by-case basis, and the implications should be assessed as part of the viability assessment.	Support and comments noted. The Policy allows sufficient flexibility in how it is delivered on a site-by-site basis.	LP300-12
8	The additional obligation to meet UGF thresholds could add significant build cost in areas with higher baseline biodiversity, potentially impacting the deliverability of affordable housing.	Comments noted. The Policy allows sufficient flexibility in how it is delivered on a site-by-site basis. Where BNG can more easily be delivered on site, the application of UGF may also be simpler. For example, the provision of and maintenance requirements for on site BNG can be used to reach the relevant UGF score and demonstrate the	LP16-5

	Respondents comments	MCC Response	Respondent ID
		required long-term maintenance of surface cover types.	
9	Recommend that the application of UGF be targeted to areas with low baseline biodiversity such as City Centre locations and applied with flexibility or on an optional basis elsewhere where BNG can be robustly delivered.	No change proposed to the plan. The Policy allows sufficient flexibility in how it is delivered on a site-by-site basis.	LP16-5
	Scope of Greening Measures and Management		
10	The elements of greening that the council is seeking to deliver through this policy seems limited.	Manchester's Urban Green Factor uses Natural England's approach, and the relevant link is provided in Policy EN6 and Appendix A. This lists an extensive range of green infrastructure that can be used to achieve the appropriate score. Flexibility concerning its location on a site, allows solutions to be designed which suit individual development schemes.	LP306-7
11	The London policy includes green roofs and walls; without good management these can become a visual amenity issue and raise viability concerns due to significant costs.	Policy EN6 Urban Green Factor allows for an extensive range of green infrastructure that can be used to achieve the appropriate score. This includes the options to use green walls and roofs but does not mandate their use. Proposed change to last sentence in paragraph 12.69 (was paragraph 12.63). “ The approach was tested on existing planning approvals, relating to sites in Manchester, and consultation was undertaken with local developers, external stakeholders and across other council departments.	LP306-7

	Respondents comments	MCC Response	Respondent ID
12	This policy is welcomed, however the use of green walls and green roofs is not mentioned. It is also difficult to see where land for cultivation (food growing) is being encouraged and Policy S1 does not include a target to increase accessibility of land for growing.	Support noted. Manchester's Urban Green Factor uses Natural England's approach, and the relevant link is provided in Policy EN6 and Appendix A. This lists an extensive range of green infrastructure that can be used to achieve the appropriate score, including green walls and green roofs, food growing, orchards and allotments.	LP296-16, LP308-34, LP360-20, LP379-21
13	Agree fully with this policy however permeable paving cannot be classed as contributing to biodiversity, amenity and wellbeing. Reinforced grass should be promoted and where green space cannot be provided, green roofs or walls should be required in lieu rather than offsite mitigation.	Support noted. The purpose of Urban Green Factor is also to improve climate resilience and reduce flood risk. Whilst the UGF surface types provide an extensive choice of GI interventions, in some locations permeable paving can also be a beneficial surface type where impermeable paving would otherwise be used. Urban Green Factor does not include offsite mitigation.	LP263-5
14	The Woodland Trust welcomes this policy and requests connecting existing habitats, retaining existing trees and woodland and ensuring appropriate management.	Support noted. Where other policies in the Local Plan deal with these matters e.g. EN4, they are not repeated as the plan should be read as a whole. Management is required as part of this policy.	LP312-8
	Standards		
15	Natural England welcomes the minimum Urban Green Factor (UGF) score of 0.4 for residential and 0.3 for other land use. This could be strengthened with a requirement of a UGF score of 0.5 for residential greenfield development.	Support and comment noted. Most housing sites within Manchester are on brownfield land. Some Manchester sites may now appear to be greenfield but often were previously developed. The policy therefore has a single score of 0.4 for residential development.	LP325-12

	Respondents comments	MCC Response	Respondent ID
16	We would support a more ambitious Urban Green Factor than London to recognise Manchester's leadership and ambition.	Comment noted. The proposed Urban Green Factor scores are based on evidence. Developers are asked to consider many policy requirements, and all our policy requirements are subject to a whole plan viability assessment.	LP290-14
	Exemptions		
17	We appreciate the steps taken by this policy to provide exemptions to certain small-scale applications such as signage. Shopfront applications share many characteristics and should also be exempted: <i>"All development proposals, except for householder, custom and self-build, shopfront and signage applications, will be required to..."</i>	Change agreed. First paragraph to include text shown in red "All development proposals, except for householder, custom and self-build, shopfront and signage applications, will be required to..."	LP23-11, LP276-16
	Other		
18	Castlefield's canal and viaduct ecology is undervalued; opportunity for pilot.	Any type of planning application as described in Policy EN6 will be required to address the provision of green infrastructure to obtain an appropriate UGF score.	LP374-18
19	For all current developments at an early stage or delayed, the application of the UGF should be applied retrospectively to prevent a two-tier approach in key city centre areas.	The change proposed would not conform with national policy and guidance.	LP281-10, LP358-11, LP360-20, LP374-18
20	There is a requirement to safeguard aviation safety where proposals may attract birds through landscaping or water bodies.	Aviation safety is addressed covered by Policy DM9. Where other policies in the Local Plan deal with an issue it is not repeated as the plan should be read as a whole.	LP305-21

	Respondents comments	MCC Response	Respondent ID
21	Sport England would not support urban greening proposals which would result in loss of playing field land or sports facilities and the policy wording is not considered strong enough to protect existing facilities.	The protection of playing fields and sports facilities is dealt with under Policy SI1. Where other policies in the Local Plan deal with an issue it is not repeated as the plan should be read as a whole	LP9-14

Question No 50 - Air Quality

Do you agree with this policy? Yes (5) In Part (9) No (0)

Yes (LP395-19, LP321-49, LP309-48, LP291-31, LP263-6)

In part (LP385-39, LP299-17, LP290-15, LP267-35, LP261-9, LP28-50, LP27-30, LP5-1, LP2-3)

	Respondents comments	MCC Response	Respondent ID
1	Policy supported	Support noted.	LP-309-48, LP-291-31
2	Policy supported. The assessment of Air Quality impacts should recognise the vital role that vegetation plays in improved air quality, and take that into consideration when considering development in heavily vegetated spaces in built up areas with existing air quality issues.	Support noted. The plan should be read as a whole. Policy EN1 seeks to maintain and improve environmental assets across the city which would contribute to the potential improvement in air quality.	LP-395-19
3	Policy supported. Development near the SRN may have indirect implications where increased volumes/congestion exacerbate pollution. Where proposals are likely to generate significant traffic near SRN corridors, air quality assessments should model NOx/PM along SRN-adjacent routes, consider modal shift strategies and mitigation (including EV infrastructure/low-emission heating). Coordination with National Highways may be beneficial where SRN corridors intersect Air Quality Management Areas or cumulative	Support noted. This is a matter for the delivery of the Local Plan and specific transport measures undertaken via other legislative processes.	LP-321-49

	Respondents comments	MCC Response	Respondent ID
	impacts could affect air quality near strategic transport infrastructure.		
4	Policy supported. The role of hedges, gardens and trees in filtering particulate and gaseous pollutants needs to be strongly acknowledged as a positive factor in improving poor air quality and protecting health.	Support noted. Policy EN1 considers Green and Blue Infrastructure.	LP-263-6
5	Support in part. Suggest the review local traffic neighbourhood (LTN) schemes where traffic is diverted along residential routes as this sometimes increases the air pollution for residents. Monitor and remove those schemes which affect local residents.	No change proposed to the plan. This is a matter for the delivery of the Local Plan and specific transport measures undertaken via other legislative processes.	LP-385-39
6	Support in part. Highlights that wood burning stoves are a significant source of air pollution and that planning rules will ensure that no new buildings incorporate them.	The matter will be subject to considerations via other legislative processes.	LP-299-17
7	The policy should be explicitly linked with the parking standards policy.	The plan should be read as a whole and policies are therefore linked implicitly negating the need for explicit links to be included.	LP-379-22, LP-308-35, LP-296-17
8	Comments on the need to reduce reliance on private cars and promoting alternative modes of travel, including walking, cycling, and public transport (Policy T1). Linked comment that public transport provision should extend into residential areas and be accessible for elderly residents, people with mobility impairments, and families with young children.	No change proposed to the plan. This is a matter for the delivery of the Local Plan and specific transport measures undertaken via other legislative processes.	LP-379-22, LP-308-35, LP-296-17

	Respondents comments	MCC Response	Respondent ID
9	The policy should ensure that vulnerable residents whose only practical option is to drive into the city centre are not excluded. Policies to reduce car use must be balanced with provision for these groups, for example through accessible parking and supporting infrastructure, to ensure equitable access to the city while achieving air quality improvements.	The plan includes policies that seek to deliver equitable outcomes for vulnerable residents (e.g. Policies DM1, T2).	LP-379-22
10	Concerned about the negative impacts of parking, in particular on pavements and the air pollution generated. Believes this should be banned and enforcement action taken, with the exception of emergency services.	Parking matters are specifically dealt with in Policy T2.	LP-344-4
11	Link provided to the standing advice from Natural England on air pollution and development. Detailed comments outlined with respect to the standing advice and how air quality should be considered in relation to the Habitats Regulations and Wildlife and Countryside Act. Natural England would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with	The plan should be read as a whole (e.g. cross ref with DM1) and the points raised are process type points that would have to be undertaken (and referred to in NE Standing Advice). Policies within the plan cover the issues highlighted by Natural England. Moreover, the local plan is accompanied by a Habitats Regulation Assessment that has screened out the majority of policies and undertaken an Appropriate Assessment where required.	LP-325-13

	Respondents comments	MCC Response	Respondent ID
	new development, particularly where this impacts on protected sites. Local authorities should consider including a local plan policy based on the suggestion below to address air pollution impacts on Habitat Sites and SSSIs. .		
12	Highlights Places for Everyone which affords specific policy wording for Holcroft Moss SSSI in Policy JP C8.	Places for Everyone is an adopted plan and therefore is already considered in current planning applications. The Local Plan, alongside Places for Everyone, will form the development plan for Manchester.	LP-325-13
13	The policy aligns with Environment Agency priorities around reducing exposure to harmful emissions, promoting clean growth, and integrating air quality considerations into spatial planning.	Comment noted.	LP-324-7
14	The Integrated Assessment Report identifies EN7 as contributing positively to health and wellbeing, climate change mitigation, and transport objectives. However, it also notes (in Section 9.2.11) that overall effects of the draft plan on air quality are neutral, due to the scale of development proposed and the potential for cumulative impacts. Suggest EN7 sets a useful framework, but further strengthening is needed	The reference to the Integrated Assessment is noted. Specific points are dealt with below.	LP-324-7

	Respondents comments	MCC Response	Respondent ID
	to ensure meaningful improvements are delivered in air quality across the Manchester region.		
15	EN7 should include provisions to steer sensitive developments (e.g. residential, schools, healthcare) away from areas in close proximity to regulated industrial facilities wherever practical. Where this is not achievable, and where critical resource pressures or strategic planning objectives override, the policy should require appropriate mitigation measures. This could include the use of stand-off distances or buffer zones between sensitive uses and regulated sites to reduce exposure to pollutants and avoid land use conflicts	No change proposed to the plan. The plan should be read as a whole including policy DM1 which sets out general provisions to deal with development and amenity issues.	LP-324-7
16	We also encourage the inclusion of a clause that facilitates the use of planning obligations, to fund abatement infrastructure at industrial sites where sensitive development is unavoidably located nearby. This could include enhanced filtration systems, stack height improvements, or other emission-reducing technologies, helping to offset potential	No change proposed to the plan. The plan should be read as a whole including policy DC1 which includes a clause for the protection or enhancement of environmental value.	LP-324-7

	Respondents comments	MCC Response	Respondent ID
	impacts and support cleaner industrial operations.		
17	Highlight air quality is a strategic issue and need to take account of impacts to/from neighbouring local authority areas. Cite the Environment Act 2021 placing a new duty on local authorities to work collaboratively with neighbouring authorities to create a cooperative framework for tackling pollution from sources outside their boundaries. Recommend EN7 explicitly references this duty and encourages cross-boundary collaboration on air quality planning and mitigation. Suggested policy wording to add: “Where sensitive development is proposed near regulated industrial facilities, appropriate buffering or stand-off distances must be provided to minimise exposure to emissions. Air quality planning will reflect the transboundary nature of pollution and be informed by cooperation with neighbouring authorities, in line with the Duty to Cooperate and the Environment Act 2021. Where sensitive development is unavoidably located near regulated facilities, planning obligations may	No change proposed to the plan. The plan includes sufficient detail to deal with air quality. The specific reference to the Environment Act sits outside of planning legislation.	LP-324-7

	Respondents comments	MCC Response	Respondent ID
	be used to secure abatement infrastructure to mitigate air quality impacts.”		
18	The precautionary principle is mentioned at p 171 in relation to flood risk but as a fundamental requirement of effective environmental policy, it should also be a golden thread running through all the policies, specifically mentioned, with actions under each.	No change proposed to the plan. The precautionary principle is set out at a national level within the NPPF.	LP-292-22
19	We are broadly supportive of this whole chapter but make the following comments., There are tensions and contradictions between environmental policy and other objectives, particularly the building programme and expansion of aviation, should be identified honestly and explicitly.	Comment noted. The matter is part of the consideration of the planning balance when weighing the merits and disbenefits of any proposed development.	LP-292-22
20	Support in part (LP290-15, LP267-35, LP27-30) Places for Everyone notes, "Greater Manchester has also signed up to achieve WHO Breathe Life City status by 2030, which means achieving WHO targets for PM (PM2.5 must not exceed 5 ½g/m3 annual mean) and other air pollutants by this date." This target should therefore be reflected in Manchester's Local Plan.	Change agreed. New paragraph 12.80 adds wording.	LP-292-22, LP-290-15, LP-267-35, LP-27-30

	Respondents comments	MCC Response	Respondent ID
21	We note that air quality will not reach the WHO standard unless action is taken to curb private motoring, and especially its growth. The city council can do more on this and we find the Air Quality section strangely silent on practical measures to be taken on Air Quality, especially given its impact on population health, particularly on children's developing lungs.	Comment noted. The matter will be subject to considerations via other legislative processes.	LP-292-22
22	Natural Ventilation is a major contributor to Air Quality in the Gorton Area. (e.g. air temperature in hot summer drops from 32 degrees C in the open on NV to about 22 degrees C in the shade of the tree groups).	Comment noted.	LP-261-9
23	Queries why there is no mention of the WHO target to limit PM2.5	Change agreed. New paragraph 12.80 adds wording.	LP-28-50
24	Request a clean air zone to protect the health of residents. Substantial evidence shows these zones have been proven to work in other cities, significantly reducing air pollution and thus reducing health risks such as lung and heart disease.	Comment noted. The matter will be subject to considerations via other legislative processes.	LP-5-1
25	The air quality impact of standing traffic or high volumes of traffic using roads as rat runs during busy periods which requires highways to retrofit a new traffic management regime adjacent to new development should also be within the scope of this policy.	Comment noted. The Local Plan can ensure mitigation of air quality issues from new development including the need for measures that are as a result of the direct impacts from the development. Indirect impacts will be subject to considerations via other legislative processes.	LP-2-3

	Respondents comments	MCC Response	Respondent ID
	It is not only new developments that need air quality consideration. (e.g.poor air quality experienced by the residents of Ellesmere St resulting from through traffic rat running to avoid queueing at the A57/56 roundabout.		

Question No 51 - Water Quality

Do you agree with this policy? Yes (9) In Part (4) No (0)

Yes (LP395-20, LP385-40, LP321-50, LP309-49, LP305-22, LP299-18, LP291-32, LP263-7, LP27-6)

In part (LP315-20, LP290-16, LP261-10, LP28-51)

	Respondents comments	MCC Response	Respondent ID
1	Policy Supported	Support noted.	LP-395-20, LP-385-40, LP-309-49, LP-299-18, LP-27-6
2	Policy supported. Where the SRN infrastructure intersects river valleys/canals/drainage systems, proposals should include integrated water management plans considering highway runoff and coordinate with National Highways to ensure compatibility with drainage infrastructure (including SuDS that reduce pressure on combined sewers).	Support noted. The plan should be read as a whole. Policy EN2 provides sufficient detail to cover the points raised.	LP-321-50
3	Policy supported. Reiterate the importance of considering the potential impact on aviation safety when considering the use of SuDS to meet the requirements due to the potential for SuDS features to attract birds. Aviation safety would need to be addressed in the determination of planning applications for such schemes within 13km of Manchester Airport and proposals that adversely impacted aircraft safety should not be supported.	Support noted. Policy DM9 sets out the requirement to consider airport safety.	LP-305-22

	Respondents comments	MCC Response	Respondent ID
4	Policy supported . Comments provided on delivery aspects including that drainage direct water through a series of on-site water features that help to filter and improve the quality of the water before being released into existing water courses. Monitoring of water quality and water run-off should also be a requirement of all new development. Development proposals should also be accompanied by a drainage management and maintenance plan including a plan for any watercourse within the application site or an adjacent watercourse where the application site is impacts riparian habitat. We welcome and agree that where feasible, development should seek to open up any culverted or hidden watercourse beneath the site to improve the ecological status of that watercourse. There should also be a presumption that new development would avoid watercourses being culverted.	Support noted. The plan should be read as a whole. Policy EN2 provides sufficient detail to cover the points raised.	LP-291-32
5	Policy supported. Suggest that the cumulative impact of paved front gardens is a huge factor exacerbating pressure on combined sewers and causing sewerage to flow into water courses. Allied to this point is a suggestion for a policy not to pave gardens but to keep them soft landscaped and fully porous.	No change proposed to the plan. Policies in the plan including Policy SP2 and DM1 provide sufficient detail to deal with this matter.	LP-263-7
6	Policy supported. UUW wishes to refer the Council to our responses to questions 40 and 52. The implementation of policies that require water efficiency measures, robust application of the surface water hierarchy and the implementation of sustainable drainage systems are key contributors to reducing the impact of development on water quality.	Support noted. Change agreed. Policy EN8 Water Quality - The policy would be retitled Water Quality and Efficiency, and include following wording:	LP-386-25

	Respondents comments	MCC Response	Respondent ID
		"All new residential developments are expected to achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. Major non-residential development will be required to achieve five credits for category Wat 01 of BREEAM unless demonstrated impracticable."	
7	We welcome the inclusion of Policy EN8 and its recognition of the importance of protecting and enhancing water quality across Manchester. The policy aligns well with national and regional priorities, and we particularly support the references to River Basin Management Plans, the safeguarding of surface and groundwater, and the promotion of sustainable drainage systems.	Support noted.	LP-324-8
8	Suggest the policy refers to an integrated catchment-based approach to water quality management. This aligns with the aims of the RBMP and the Greater Manchester Combined Authority's Integrated Water Management Plan (2023). A possible addition to the policy could be: "Development proposals should demonstrate how they contribute to integrated water management across the catchment, including consideration of cumulative impacts on water quality, flood risk, and ecological status, in line with the Greater Manchester Integrated Water Management Plan."	Change agreed. Addition to the policy could be: "Development proposals should demonstrate how they contribute to integrated water management across the catchment, including consideration of cumulative impacts on water quality, flood risk, and ecological status, in line with the Greater Manchester Integrated Water Management Plan."	LP-324-8

	Respondents comments	MCC Response	Respondent ID
9	Suggest the policy explicitly requires compliance with the WFD, including: no deterioration in water body status; support for achieving good ecological and chemical status; and reference to WFD objectives in development decision-making. This would provide clarity and ensure that water quality objectives are embedded in the planning process. A recommended wording could be: “Development will be required to Demonstrate compliance with the Water Framework Directive (WFD), ensuring no deterioration in water body status and supporting the achievement of good ecological and chemical status.	No change proposed to the plan. The compliance with the WFD is dealt with by a separate legislative process.	LP-324-8
10	Suggest Policy EN8 should include a requirement for developers to demonstrate that wastewater treatment capacity is sufficient and will not deteriorate water quality, which is supported by Table 8.1 in the IA, directly concerning this Water Quality Policy. The IA further notes as a whole that because of this lack of coverage, EN8 as currently written will have uncertain effects on water protection.	No change proposed to the plan. The general capacity for wastewater is covered in the Infrastructure Delivery Plan.	LP-324-8
11	Suggest the policy requires Construction Environmental Management Plans (CEMPs) to include specific water pollution control measures, such as sediment barriers, spill kits, and emergency response protocols. These plans should also include measures to prevent the unimpeded discharge of impacted water to sensitive receptors, including both surface and groundwater bodies. We also encourage the use of vegetated buffers and permeable surfaces to reduce runoff pollution and support SuDS delivery.	No change proposed to the plan. The points raised are matters for specific delivery of projects during the construction phase.	LP-324-8

	Respondents comments	MCC Response	Respondent ID
12	We recommend that the policy include specific provisions to: steer high-risk development away from SPZs; avoid dewatering activities in sensitive locations; and require developers to refer to the Environment Agency's Groundwater Protection Position Statements. Suggested wording to add could be: "Development will be required to avoid adverse impacts on Source Protection Zones (SPZs), particularly the SPZ at Moss Side. High-risk developments should be steered away from SPZs, and proposals must refer to the Environment Agency's Groundwater Protection Position Statements.	Change agreed. The following wording has been added to the supporting text rather than the policy. Manchester contains a Source Protection Zone (SPZ) centred around Moss Side, which is particularly sensitive.	LP-324-8
13	Suggest refining the culvert definition and changing this policy to say: "Where feasible and appropriate (i.e. where it supports WFD objectives and does not compromise flood risk or infrastructure integrity), seek to open up any culverted or hidden watercourse beneath the site to improve the ecological status of that watercourse." This provides clarity and ensures that daylighting supports wider environmental objective, which is supported by the IA (Section 9.2.10), that notes uncertainties around wastewater treatment capacity. Opening up culverts can also help developers meet wider planning policy objectives such as to achieve environmental and biodiversity net gains, as well as creating / strengthening networks of multifunctional green infrastructure.	No change proposed to the plan. The additional detail is not considered to provide necessary clarity to the policy.	LP-324-8
14	Policy supported in part. Suggest the addition of wording "...where feasible and appropriate".	No change proposed to the plan. The additional wording is not considered to	LP-315-20

	Respondents comments	MCC Response	Respondent ID
		be necessary in the context of the policy.	
15	The draft Local Plan consultation has few references to the impact of sewage (and other pollutants) on water quality within the Manchester area and beyond as well as heavy metal (and other pollutants) from highway run-off. Para 12.76 identifies that when we have heavy rainfall, surface water mixes with sewage and exceeds the capacity of the combined sewer network, leading to spills from the Combined Sewer Overflows (CSOs). There remains a huge task for our rivers to reach required conditions (as defined by national regulations (by 2027). We would query whether the policies outlined in EN8 are sufficient to prevent future pollution in Manchester's waterways.	No change proposed to the plan. The plan should be read as a whole and in particular Policies DM1 which picks up various matters to be considered for all developments.	LP-290-16
16	NV is a major contributor to Water Quality in the Gorton Area. It acts as a SUDS which are required under Section 12.78 of the Council document. NV prevents the Manby Rd area and parts of Longsight from being flooded and it prevents the breakdown of the culverted Gore Brook River. However, this means it can get muddy at times and residents cannot use NV for walking around.	Comment noted.	LP-261-10
17	Policy supported. Suggest the policy could be enhanced with the inclusion of nature-based solutions, in particular the creation of small urban scrapes and wetlands plus pocket sponge parks.	Support noted. No change proposed to the plan. The plan should be read as a whole with Policies EN1 and EN5 providing sufficient detail.	LP-29-25

	Respondents comments	MCC Response	Respondent ID
18	All new development and refurbishments should comply with water bye-laws and plumbing standards to prevent misconnections of grey water (baths, showers, sinks, dishwashers, washing machines) and WC flushing to surface water drains (rather than to sewer).	Comment noted. Bye-laws would be considered within the wider development process.	LP-29-25
19	New development should not take place until the capacity is guaranteed to be provided unless greenfield runoff rates can be achieved. Without such provision, new development risks exacerbating the frequency, volume and duration of existing combined sewer overflows to rivers in Manchester.	Comment noted. Greenfield runoff rates are specified in Policy EN9 and as a result development proposals will need to take account of this matter.	LP-29-25
20	Ensure new development does not disturb historic waste tips or landfill, unless the site is remediated in advance, which could exacerbate leaching of pollutants from such sites into rivers or the groundwater.	Comment noted. Policy EN10 deals with contaminated land.	LP-29-25
21	General support for the policy.	Support noted.	LP-28-51

Question No 52 - Flood Risk

Do you agree with this policy? Yes (9) In Part (3) No (0)

Yes (LP395-21, LP321-51, LP309-50, LP305-23, LP299-19, LP291-33, LP263-8, LP28-52, LP27-11)

In part (LP385-41, LP315-21, LP261-11)

	Respondents' comments	MCC Response	Respondent ID
1	Agree with the policy - no further comments	Support noted.	LP395-21, LP309-50, LP28-52, LP27-11, LP309-50
2	Agree with the policy in part, with further comments	Support noted. Further comments as below.	LP385-41, LP315-21, LP305-23, LP263-8, LP261-11
3	Agree with the policy, with further comments	Support noted. Further comments as below.	LP299-19 LP29-26, LP291-33, LP263-8
	Reducing flooding/flood risk		
4	"Within this submission we have identified various flood risks which are not reflected in the latest Strategic Flood Risk Assessment. It is critical that all the flood risks we have identified are reflected in an	Additional updated evidence has been produced including an updated Level 1 SFRA and recommendations for any further Level 2 SFRA.	LP386-26

	Respondents' comments	MCC Response	Respondent ID
	update to your Strategic Flood Risk Assessment. This reflects paragraphs 171, 174 and footnote 63 of the National Planning Policy Framework."		
5	Concerned about the impact of new developments on increasing the risk of surface water flooding.	Comment noted.	LP397-3
6	Currently schemes are not properly assessed, meaning planning permission is too likely to be granted, leading to flooding issues. (LP397-3) Request a link to Policy EN2 regarding the inclusion of undeveloped buffer zones (at least 8m, preferably 10m) to the top bank of main rivers, for access, maintenance, ecology, and flood risk management.	No change proposed to the plan. The plan should be read as a whole and the link to Policy EN2 is therefore not required.	LP324-9
7	Policy should require level-for-level, volume-for-volume compensation for any loss of floodplain storage (wording suggested).	No change proposed to the plan. Any development within the flood plain is very carefully controlled and limited to specific infrastructure and developments.	LP324-9
8	Development should not impede fluvial flood routes, and should consider opportunities to provide flood storage.	No change proposed to the plan. Any development would be considered in terms of impact on fluvial flood routes.	LP324-9

	Respondents' comments	MCC Response	Respondent ID
9	Flood Risk Assessments (FRAs) must incorporate climate change allowances in line with the latest Environment Agency guidance (wording suggested).	Comment noted. This is a matter for specific development proposals to address in their FRAs.	LP324-9
10	Strategic sites should include a flood risk monitoring framework and long-term maintenance (wording suggested).	No change proposed to the plan. This can be dealt with in the implementation of development proposed as required by specific approvals via conditions or appropriate planning obligations.	LP324-9
11	Flood risk assessments should consider impacts on the strategic road network (SRN), and appropriate responses.	Comment noted and flood risk is considered in terms of the SRN where appropriate.	LP321-51
12	Proposed policy mentions 1 in 100 year storm events. This should be strengthened to be 1 in 100 year storm event plus 20% for climate change, and a further 10% for urban creep.	The updated SFRA takes into account the latest Environment Agency modelled impacts due to climate change.	LP315-21
	Sustainable drainage		
13	Permeable paving is not an adequate solution to reducing run-off from paving front gardens. The policy should prevent gardens being paved at all.	Comment noted. The paving over of gardens on dependent on the scale of any proposal for paving over (permitted development rights may prevail).	LP236-8
14	Issue of surface water runoff is extremely important.	Comment noted.	LP263-8, LP299-19

	Respondents' comments	MCC Response	Respondent ID
15	The run-off rates specified are inconsistent with the National Standards for SuDS published in July 2025.	The run-off rates have been agreed with the Lead Local Flood Authority.	LP386-26
16	Policy wording should be strengthened to ensure sustainable drainage is used in new developments.	No change proposed to the plan. The plan should be read as a whole as there are a number of policies that refer to SUDs.	LP386-26
17	Nutsford Vale is important for water quality and as a SuDS in the Gorton area.	Comment noted.	LP261-11
18	Support SuDS and propose encouraging multifunctional SuDS (e.g. for water quality, drainage, biodiversity, and amenity), SuDS in smaller developments, clarifying where different types are appropriate, and requiring maintenance plans and consideration of climate (wording suggested)	Comment noted.	LP324-9
19	SuDS must follow the SuDS hierarchy in 'national standards for sustainable drainage systems) (link provided), prioritising filtration instead of discharge to watercourses or sewers.	Comment noted and reference to national standards ensures that this will be adhered to.	LP324-9
20	Support the proposals on SuDS	Comment noted.	LP324-9, LP324-9
21	SuDS within 13km of Manchester Airport should consider impact on aviation safety due to attracting	Comment noted.	LP305-23

	Respondents' comments	MCC Response	Respondent ID
	birds, with proposals adversely impacting safety being refused.		
22	New development should not take place until drainage/sewerage capacity is guaranteed to be provided unless greenfield runoff rates can be achieved through SuDS or nature-based solutions.	The policy sets out greenfield runoff rates and the plan should be read as a whole as there are a number of policies that refer to SUDS.	LP29-26
23	There should be a requirement for development to retain water onsite for as long as possible.	Comment noted. The plan should be read as a whole as there are a number of policies that refer to SUDS.	LP291-33
	Culverts		
24	Culvert policy should be strengthened, with suggested wording: "Where feasible and appropriate (i.e. where it supports WFD objectives and does not compromise flood risk or infrastructure integrity), seek to open up any culverted or hidden watercourse beneath the site to improve the ecological status of that watercourse'	No change proposed to the plan. The additional detail is not considered to provide necessary clarity to the policy.	LP324-9
25	Support the proposals on culvert daylighting.	Support noted.	LP324-9
26	Downstream impacts of opening up watercourses (e.g. increased silt and rubbish accumulating in remaining culverts downstream, with increased	Comment noted. The matters raised are related to operational matters that would be addressed beyond Local Plan policies.	LP315-21

	Respondents' comments	MCC Response	Respondent ID
	maintenance costs) should be addressed within the policy.		
	Other		
27	Contamination policies should be strengthened (links provided to examples from other LPAs)	No change proposed to the plan. The plan should be read as a whole and it is considered there is sufficient detail within the plan to deal with the matter.	LP324-9
28	The second paragraph only refers to the PPG. It should also refer to NPPF or say 'set out in national policy and guidance'	The supporting text already refers to national policy and guidance.	LP386-26
29	Policy EN9 (apart from the final paragraph on culverted rivers) should be replaced with two separate policies; one for flood risk and one for sustainable drainage (wording suggested).	No change proposed to the plan. The policy is considered effective in its current state.	LP386-26
30	In areas at risk of flooding, evacuation and support plans should be implemented for disabled residents	Comment noted and a matter for operational plans dealing with flood risk events.	LP385-41
31	Support the proposals on sequential approach	Support noted.	LP324-9
32	Development should seek to deliver nature-based solutions as the best approach to alleviating flood risk.	The plan should be read as a whole with policies covering nature based solutions contained within the environment chapter of the plan.	LP291-33
33	Water management features should deliver biodiversity, and link green & blue Infrastructure to the wider environment.	The plan should be read as a whole with policies covering biodiversity, and green and blue	LP291-33

	Respondents' comments	MCC Response	Respondent ID
		infrastructure contained within the environment chapter of the plan.	

Question No 53 - Contaminated Land

Do you agree with this policy? Yes (5) In Part (3) No (0)

Yes (LP385-42, LP321-52, LP309-51, LP291-34, LP28-53)

In part (LP404-17, LP315-22, LP267-36)

	Respondents comments	MCC Response	Respondent ID
1	The Trust agrees with and supports the policy.	Support noted.	LP291-34
2	I agree with the Policy. Interestingly, Sand Hills Park, adjacent to my home, was contaminated with Anthrax during the Industrial Revolution, more than 100 years ago. According to research, such contamination is now reduced to acceptable levels for human use. I hope that any future redevelopment of this land will be properly checked to ensure it is completely safe for development.	Support noted.	LP309-51
3	The frequent presence of asbestos on Manchester brown field sites needs to be specifically acknowledged in this clause (e.g the notorious Turner and Newall site in Rochdale and Ryebank Fields in Chorlton).	No change proposed to the plan. The presence of asbestos is a specific matter that will be considered on a site-by-site basis.	LP404-17

	Respondents comments	MCC Response	Respondent ID
4	The policy should not be confined to former mining areas but explicitly state 'former mining and other contaminated areas'	No change proposed to the plan. The first part of the policy specifically deals with contaminated land.	LP267-36
5	Agree with the policy in part and ask that the following minor change is made to the policy wording and supporting text. Policy EN10 - Ground Contamination and Ground Stability. As set out under policy EN2, this policy could potentially go further in terms of including canal stability (alternatively this may be better under policy EN2 as we suggest). In addition to this where there is contaminated land adjacent to the canal, sometimes our asset can be impacted. It will be important that there is a robust policy to ensure that our waterways are protected and we would welcome specific wording being included in the support text to the policy in relation to this matter.	No change proposed to the plan. The policy along with other policies in the plan is considered to already provide sufficient details that would deal with the matter raised.	LP315-22
6	Given the risks and unknowns of contaminated/former landfill or industrial sites, which have renaturalised and are now greenfield, there should be careful consideration before development as in many cases the site is best left undisturbed.	No change proposed to the policy. The policy wording provides sufficient flexibility that takes account of the issue raised.	LP395-22
7	While primarily local, development near the SRN may have indirect implications where instability/contamination could affect SRN infrastructure or drainage. Coordination with National Highways is advised to ensure remediation works do not compromise SRN integrity or safety.	No change to the plan. The Local Plan, alongside Places for Everyone, will form the development plan for Manchester. The specific elements are covered by Policy JP C8 in Places for Everyone.	LP321-52 (National Highways)

	Respondents comments	MCC Response	Respondent ID
8	UUW requests that the following wording is added to this policy. Proposals which are likely to result in contaminants entering formal surface or foul water drainage systems will not be permitted, without the express consent of the asset owner. Where consent of the asset owner is refused, applicants must demonstrate how contaminated water will be addressed at source in their remediation strategy.	No change proposed to the plan. The plan should be read as a whole and policies already provide sufficient detail to deal with this matter.	LP386-27 (United Utilities)
9	Welcome the inclusion of Policy EN10, which recognises the importance of addressing land contamination and ground stability risks in development proposals. The current policy is notably brief and would benefit from further detail to ensure it provides a robust framework for managing contamination risks across Manchester. Given Manchester's extensive industrial legacy, with approximately 26.5% of land having had an industrial use at some point (source: Manchester City Council Local Plan Integrated Appraisal: Scoping Report, 2021), it is essential that the policy reflects the full range of contamination risks and sets clear expectations for developers. The current policy only refers to mining related risks, which does not sufficiently reflect the contamination profile of Manchester. We recommend broadening this scope to include risks from historical industrial uses, landfill sites, along with hydrocarbons, heavy metals and other pollutants. Suggested wording could be: <i>'Development proposals must assess and address</i>	No change proposed to the plan. The first part of the policy, whilst concise, provides a sufficient level of detail that deals with the points raised.	LP324-10 (EA)

	Respondents comments	MCC Response	Respondent ID
	<i>risks from all forms of ground contamination, including those arising from historic industrial use, landfill, and other sources.</i>’To ensure contamination is properly identified and managed, we would recommend requiring a desk study and site investigation (Phases 1 and 2) in line with current Environment Agency and Manchester City Council guidance, with suggested wording of: <i>‘Where land contamination is known or suspected, development proposals must be supported by a preliminary risk assessment (Phase 1 desk study and site investigation) in line with the Environment Agency’s published Land Contamination Risk Management (LCRM) guidance and any relevant local guidance developed by Manchester City Council. Where development is proposed on brownfield land, it should be presumed that land contamination may be present, and a risk assessment must therefore be undertaken to ensure the site is suitable for its intended use.’</i>Where adverse contamination is identified, a site-specific remediation strategy and verification, should be developed and agreed by the planning authority prior to first use/occupation. should be agreed with the Council and validated prior to occupation. This ensures that risks are properly mitigated and that the site is safe for its intended use, with wording of: <i>‘Where contamination is identified, a remediation strategy must be agreed with Manchester City Council and</i>		

	Respondents comments	MCC Response	Respondent ID
	<i>validated prior to occupation.</i>’ Additionally, all assessments and remediation should follow the EA’s guidance Land contamination risk management (LCRM) - GOV.UK with a suggested addition: ‘<i>All assessments and remediation must follow Environment Agency guidance on Land Contamination Risk Management (LCRM).</i>’ We recommend that the policy also explicitly references the NPPF and associated Planning Practice Guidance which sets out the requirement for safe development on previously developed (brownfield) land, tackling unacceptable risks from pollution, and ensuring land is suitable for its new use. This would help ensure consistency with national policy and provide clarity for applicants.		

Question No 54 – Waste

Do you agree with this policy? Yes (5) In Part (3) No (0)

Yes (LP321-53, LP309-52, LP291-35, LP28-54, LP16-12)

In part (LP404-18, LP290-17, LP27-2)

	Respondents' comments	MCC Response	Respondent ID
1	Agree with the policy, no further comments.	Support noted.	LP291-35, LP28-54
2	Agree with the policy, with further comments.	Support noted. Further comments dealt with below.	LP321-53, LP309-52, LP16-12
3	Agree with the policy in part, with further comments.	Support noted. Further comments dealt with below.	LP404-18, LP290-17, LP27-2
	Reducing waste		
4	Stronger policy needed to prevent waste being generated (12.88 cited).	No change proposed to plan. Further detail will be covered in the new Joint Minerals and Waste Local Plan.	LP404-18
5	There should be better education about recycling.	No change proposed to plan Comment noted.	LP309-52
6	The plan should promote sites for refilling water bottles to prevent littering by drinks bottles.	No changes proposed to plan Comment noted.	LP404-18
7	The plan should facilitate a local deposit return scheme for bottles and cans. Suggest S106 for funding.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP404-18

	Respondents' comments	MCC Response	Respondent ID
8	More furniture and household items from house clearances should be recycled/reused.	No changes proposed to plan Comment noted.	LP309-52
	Waste collection		
9	There should be no charges at waste collection points for smaller amounts of builders' waste, to reduce fly-tipping. Suggest funded with S106.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP404-18
10	Skip days for high rise flats are needed.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP309-52
11	The waste collection service of up to three items per household per year is inadequate, leading to fly-tipping.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP309-52
12	Disabled residents should have accessible waste disposal, and support, where required.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP385-43
	Other		
13	Waste facilities near the strategic road network (SRN) should have transport impact assessments.	No changes proposed to plan Comment noted.	LP321-53
14	There should be a presumption against incineration, due to impacts on climate, waste reduction and air quality.	No changes proposed to plan. Further detail will be covered in the new Joint Minerals and Waste Local Plan.	LP290-17, LP27-2
15	There should be a single national digital materials reuse platform, for centralised access of data for all stakeholders. This would align with the UK government's 2018 Resource and Waste Strategy proposal (cites 6.4.1 establishing cross-government oversight of the UK's national resource security) to create a national materials 'datahub'.	No changes proposed to plan Issue outside of the scope of the Local Plan	LP16-12

Question No 55 – Minerals

Do you agree with this policy? Yes (4) In Part (2) No (0)

Yes (LP385-44, LP321-54, LP291-36, LP28-55)

In part (LP290-18, LP27-20)

	Respondents' comments	MCC Response	Respondent ID
1	Policy supported, without further comments	Support noted.	LP385-44
2	Policy supported, with further comments (as below)	Support noted, comments response as below.	LP291-36, LP404-19, LP321-54
3	Policy supported in part	Partial support noted.	LP385-44
	Climate		
4	The delay in banning horticultural peat by government should not result in decreased action to end the use of peat.	No changes proposed to plan Issue outside of the scope of the Local Plan.	LP291-36
5	Peat-grown plants should not be used in any approved schemes	No changes proposed to plan Issue outside of the scope of the Local Plan.	LP404-19
6	No peat should be introduced to any site.	No changes proposed to plan Issue outside of the scope of the Local Plan.	LP404-19
7	A parks policy should ban peat from use in public green spaces.	No changes proposed to plan Issue outside of the scope of the Local Plan.	LP404-19
8	The minerals policy should preclude any fossil fuel extraction, including coal and shale gas.	No changes proposed to plan Precluding any fossil fuel extraction is considered inconsistent with national policy. In addition, matters of mineral extraction, fossil fuels and	LP290-18

	Respondents' comments	MCC Response	Respondent ID
		unconventional gas resources are considered by policies 5 and 6 of the Greater Manchester Joint Minerals Development Plan.	
	Highways		
9	Coordination with National Highways is advised to ensure mineral transport does not adversely affect Strategic Road Network (SRN) operations.	No changes proposed to plan Comment noted	LP321-54
10	Sites for recycled aggregate processing should consider proximity to SRN junctions and impacts on traffic and air quality.	No changes proposed to plan Comment noted	LP321-54
	Other		
11	Waste treatment plants should be encouraged to recycle organic waste for use locally.	No changes proposed to plan Issue outside of the scope of the Local Plan.	LP404-19