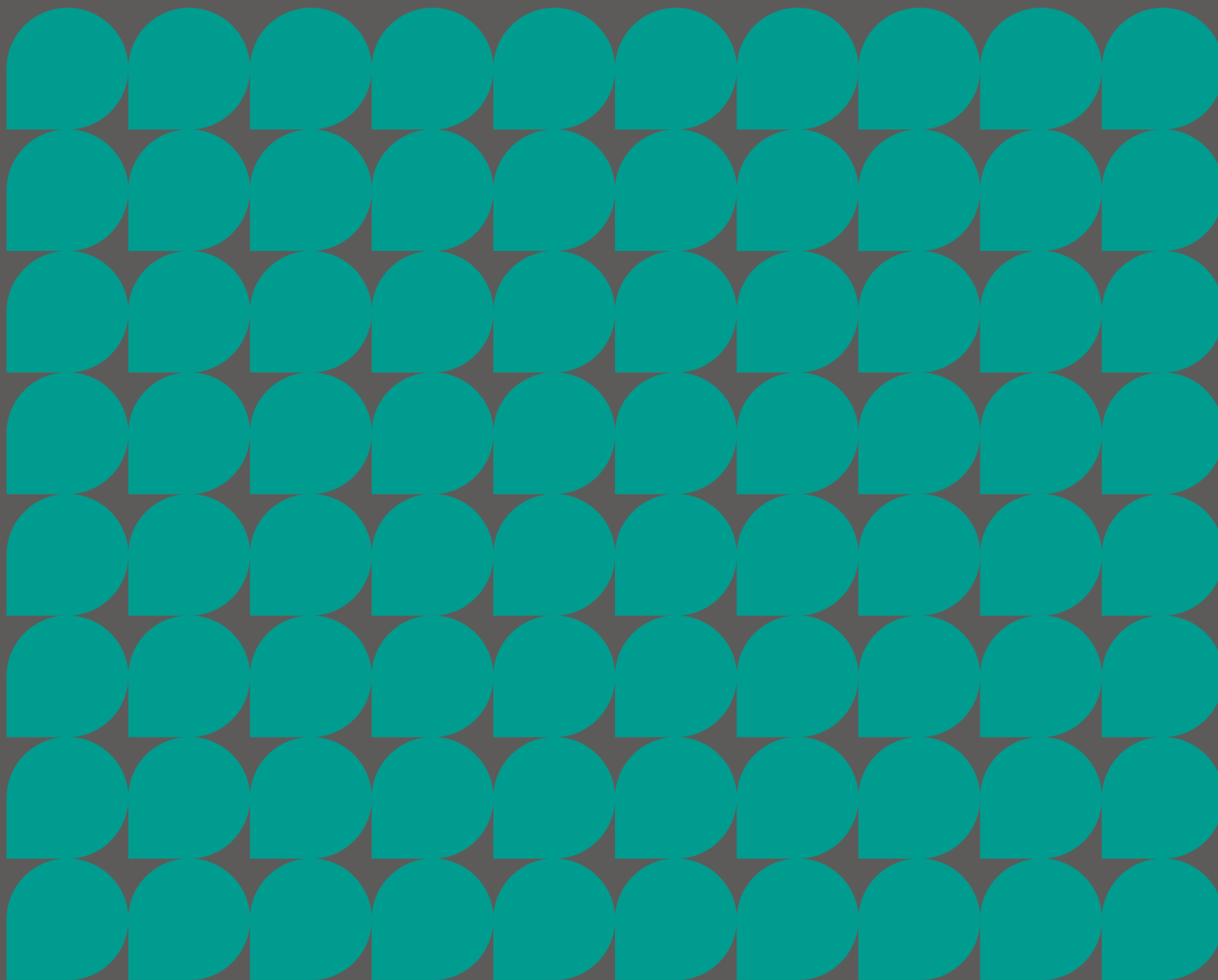


Places for Everyone

Allocations: Cross Boundary Stakehill

Issues Summary

February 2022



Chapter 11 – Site Allocations (Cross-Boundary)

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 11 and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JP Allocation 2 – Stakehill

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Green Belt		
JPA-2.1	The Green Belt in this area is a precious resource that should not be built on, it is sacrosanct use brownfield instead. Brownfield first.	<p>The Growth and Spatial Options Topic Paper [02.01.10] sets out the approach to accommodating growth within the plan area.</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. Chapter 14 of the Stakehill Allocation Topic Paper [10.01.56] sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary [07.01.25.] Section C of the Beal Valley Allocation Topic Paper [10.05.32] summarises the evidence in relation to the Green Belt. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No change is necessary.</p>	See appendix
JPA-2.2	Green Belt is protected by National Policy. PfE shows removal of Green Belt protection for some areas and creation of greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this. No local benefits and the local rural economy and residents would be severely adversely affected.	<p>Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and fully justified. The Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary (July 2021) [07.01.25] sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations within the plan.</p> <p>The exceptional circumstances take the form of the strategic level case – high level factors that have influenced and framed the decision to alter boundaries,</p>	See appendix

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		<p>such as meeting housing need; and local level case – specific factors relevant to the proposed releases that complement the strategic case.</p> <p>In terms of the local-level case, the exceptional circumstances for the release of the Stakehill allocation from the Green Belt are that the site meets criteria 3 and 5 of the Site Selection criteria as set out in the Site Selection Background Paper (July 2021) [03.04.01].</p> <p>Furthermore, the proposed strategic allocations seek to ensure that any development on land currently identified as Green Belt provides an opportunity to significantly enhance the green infrastructure and biodiversity of the site, as well as improving access to the open countryside for the local community through enhancing walking and cycling links.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA-2.3	<p>Green Belt land was created to stop towns joining together creating an urban sprawl, here it separates Middleton and Rochdale. This will cause over development and lead to urban sprawl. Not justified to reclassify greenbelt to be built on when national policies exist to protect Green Belt and to reverse the effects of climate change. Inconsistent with national policy.</p>	<p>Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and fully justified. The Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary (July 2021) [07.01.25] sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations within the plan.</p> <p>The exceptional circumstances take the form of the strategic level case – high level factors that have influenced and framed the decision to alter boundaries, such as meeting housing need; and local level case – specific factors relevant to the proposed releases that complement the strategic case.</p> <p>In terms of the local-level case, the exceptional circumstances for the release of the Stakehill allocation from the Green Belt are that the site meets criteria 3 and 5 of the Site Selection criteria as set out in the Site Selection Background Paper (July 2021) [03.04.01].</p>	See appendix

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		It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	
JPA-2.4	The draft states the Green Belt boundary needs to be able to endure beyond the life of this plan hence the need to include land and sites over and above those in the existing land supply. Unconvinced of the requirement or need to include a future proofed green belt adjustment within this plan as indicated in paragraph 7.12. If indeed it is a statutory requirement, then surely these Green Belt sites could be merely flagged in this plan for further review but clearly stated as not for implementation without extensive further public consultation.	Given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. See Growth and Spatial Options Paper: [02.01.10] for further information. No changes are considered necessary.	Kevin Brady
JPA-2.5	Following Brexit, the green belt land should be readily available to be brought back into full production, alongside provision for wildlife and recreation.	Policy JP-G10 outlines the approach to Green Belt, which is in line with NPPF. With regards to Brexit, as detailed in Chapters 1, 6 and 7 of the Plan, two assessments of the potential impacts of Brexit (and Covid-19) on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . No changes are considered necessary.	Lynne Hastings
JPA-2.6	The existing Plan should undergo regular reviews over the plan period, by doing this the release of Green Belt could undergo appropriate re-evaluation as to its inclusion in allocations. It is essential that brownfield options should be continually reassessed to ensure that there is a continued focus on these areas before the release of Green Belt.	Paragraph 140 of NPPF states that, 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.' The Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary (July 2021) [07.01.25] sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations within the plan. No changes are considered necessary.	John McKenniff
JPA-2.7	The plan talks about creating new Green Belt land so there is a smaller net loss of Green Belt – a shocking attempt to deceive	The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25]	See appendix

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	people. And how will this be protected from development in years to come? It is an insult to the intelligence of local people.	provides appropriate justification for the Green Belt Additions. No changes are considered necessary.	
	Health and Well-being		
JPA-2.8	<p>The physical and mental health benefits of access to green spaces have not been adequately considered. Take this away and you will destroy mental health.</p> <p>Loss of recreational space for the local population, many of whom enjoy walking, cycling and exercising in the area, which is a great source of stress management, healthy habits and well-being.</p> <p>Following the pandemic the green spaces we have are more important than ever for our physical and mental well-being. This site has contributed to many people's mental well being by being able to get out and walk in the countryside and usage has increased. The loss of these areas of Green Belt would be in direct conflict with policy JP-P6.</p>	<p>As set out in the Stakehill Allocation Topic Paper [10.01.54] the Integrated Assessment [02.01.02, 02.01.04, 02.01.05] has incorporated a Health Impact Assessment. Stakehill scored significantly positive for supporting a healthier lifestyle and improvements in health and promoting access to green space and positive in relation to ensuring people are adequately served by health care facilities (page 128, 02.01.05).</p> <p>The plan should be read as a whole and paragraph 9.32 of PfE identifies some of the ways in which PfE will support improvements in health and wellbeing and reduce health inequalities.</p> <p>Policy JP-P1 seeks to deliver sustainable places which can assist in improving quality of life and in addition and Policy JP-6 sets out ways that new development will be required to help tackle health inequality.</p> <p>In addition, the wider health benefits of Green Infrastructure are reflected through Policy JP-G2 Green Infrastructure Network. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix
	Wildlife and Ecology		
JPA-2.9	<p>Concerns regarding the site: being a haven for wildlife and the extinction of wildlife, such as hedgehogs, mice, deer, foxes, owls, lapwings (which are protected), bats, moles frogs, song birds, a sparrowhawk, kestrels, herons and a cormorant in the field in front of Grange Road, and it's hedgerows. Would be a disaster for wildlife.</p> <p>Part of the allocation site (the 1km square SD8909) has been monitored for the past 20 years for the British Trust for Ornithology's Breeding Bird Survey and supports a diverse mix of species</p>	<p>The plan should be read as a whole and Policy JP-G9 sets out the approach regarding biodiversity and geodiversity and states that across the plan as a whole, a net enhancement of biodiversity resources will be sought. It states that development will be expected to follow the mitigation hierarchy of:</p> <p>avoiding harm to biodiversity, particularly where it is irreplaceable, and including consideration of alternative sites where appropriate; then mitigating (within the local area) any harm to biodiversity and then; compensating (within the local area) for any remaining harm to biodiversity</p>	See appendix

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	<p>including Section 41 NERC Act species: Dunnock, House Sparrow, Lapwing, Linnet, Reed Bunting, Skylark, Song Thrush and Starling. Bird surveys may be required to inform mitigation requirements for ground nesting birds such as Lapwing.</p> <p>S41 species are a material consideration in planning and their loss without compensation would merit refusal, they should be considered as a potential constraint on the proposed allocation. Mitigation and enhancement plans must be provided and must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided.</p> <p>Ecological concerns including the loss of ponds and Great Crested Newts. See new ponds are to be created however the mitigation hierarchy requirements under Biodiversity Net Gain to avoid, then to mitigate, and finally to compensate. Welcome the proposal to create commuting links between the newly created pond habitat and grassland but biodiversity would be better served by retaining the priority pond habitat. Where retention of such habitats is proven to be impossible, the quality of the compensatory habitat must be of a better ecological quality than that lost. Further surveys are needed including for Great Crested Newts.</p>	<p>A Preliminary Ecological Appraisal [10.01.28 and 10.01.35] has been carried out by Greater Manchester Ecology Unit for this site to inform PfE. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.</p> <p>The appraisal found that currently there are no known ecological constraints which are so important as to preclude the allocation of the site, but that ecological mitigation and compensation would likely be needed to avoid harm to important habitats and species. It added that impacts on European sites will need to be assessed and where necessary mitigated. It recommended that further surveys would be required to inform planning applications.</p> <p>It concluded that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area. Ecological recommendations will also be taken into account as part of the masterplanning, required by criteria 3, in order to achieve the requirement for biodiversity net gain as set out in policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity' of the Plan.</p> <p>The appraisal also concluded that the retained areas of Green Belt within the allocation provide an opportunity to deliver biodiversity net gain.</p> <p>Finally, Policy JPA 2 states that development will be required to:</p> <p>Retain and where possible enhance areas of biodiversity within the area, notably the Rochdale Canal Site of Special Scientific Interest, along with the existing brooks and ponds within the site; and</p> <p>Carry out a project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	

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JPA-2.10	The Central Area's Ecological Notes refers to a mosaic of habitats found in this area and states they are of poor quality so there is no legal obligation to provide compensation. This is inaccurate as under BNG all habitat to be lost must be counted under the metric and compensated for.	The plan should be read as a whole and Policy JP-G9 sets out the approach regarding biodiversity and geodiversity and states that across the plan as a whole, a net enhancement of biodiversity resources will be sought. It outlines the mitigation hierarchy that development will be expected to follow. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	The Wildlife Trust
JPA-2.11	Note that the GMEU have identified that ecological mitigation and compensation that will be needed to avoid harm to important habitats and species and that as it is close to the Rochdale Canal SAC/SSSI. Support this requirement.	Support of requirement noted. Policy JPA 2 outlines in criteria 16 that development will be required to retain and where possible enhance areas of biodiversity within the area, notably the Rochdale Canal Site of Special Scientific Interest.	The Wildlife Trust
JPA-2.12	The Environment Bill aims to protect wildlife and enhance biodiversity. The ecological appraisal by Ascerta in July 2019 for the site where 1,680 homes are proposed to be built recorded it to be rich in wildlife, home to priority action species. To build homes here would show the plan to be unsound as it would result in the destruction and damage of wildlife habitats and priority species. Makes it incompatible with national policies such as the 25 Year Environment Plan and GMCA's. It is not clear how it will deliver any net gains in biodiversity.	The plan should be read as a whole. Policy JP-G9 sets out the approach regarding biodiversity and geodiversity and states that across the plan as a whole, a net enhancement of biodiversity resources will be sought. It outlines the mitigation hierarchy that development will be expected to follow. A Preliminary Ecological Appraisal [10.01.28 and 10.01.35] has been carried out by Greater Manchester Ecology Unit for this site to inform PfE. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy. Policy JPA 2 outlines in criteria 16 that development will be required to retain and where possible enhance areas of biodiversity within the area and in criteria 17 that project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more will be required. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	See appendix
JPA-2.13	In relation to ecology, it is noted that the GMCA's appraisal indicates that any ecological constraints on the site are unlikely to be significant but further surveys are required. It is our view that the evidence base on this important issue is somewhat lacking and is not robust enough to currently warrant allocation of the site. There	Policy JPA 2 outlines in criteria 16 that development will be required to retain and where possible enhance areas of biodiversity within the area and in criteria 17 that project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more will be required.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

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	appears to have only been a limited wildlife study – desktop and one day on-site visit – which give an incomplete description of the actual situation.	Furthermore, Policy JP-G9 sets out the approach regarding biodiversity and geodiversity and states that across the plan as a whole, a net enhancement of biodiversity resources will be sought. The plan should be read as a whole. No changes are considered necessary.	
JPA-2.14	The impact on the adjacent SSSI and Country Park both in terms of views and the potential for increased footfall also needs to be given greater consideration	Criteria 6 of JP Allocation 2 states that development will be required to have regard to views from Tandle Hill Country Park in terms of the design, landscaping and boundary treatment in order to minimise the visual impact as much as possible. Criteria 16 also states development at the site will be required to retain and where possible enhance areas of biodiversity within the area, notably the Rochdale Canal Site of Special Scientific Interest, along with the existing brooks and ponds within the site. No changes considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
JPA-2.15	The majority of this land has been farmed for centuries and the fields, paths and hedgerows are relatively unchanged from early maps. The GMA2 - 4 Stakehill (North) Ecology report states that further in-depth assessments need to be undertaken. This should be done prior to further consideration of this allocation site. There is potential for regionally significant archaeological remains within the site. A full report on the ecology has been deferred.	Criteria 5 of JP Allocation 2 states that development will be required to protect and enhance archaeological features and where appropriate carry out archaeological evaluation in the form of geophysics, field walking and trial trenching for areas specified in the Stakehill Historic Environment Assessment 2020 to understand where especially significant archaeology must be preserved in situ. In addition, criteria 17 states that project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more will be required. No change considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
	Consultation		
JPA-2.16	Documents deliberately long to stop people responding on purpose. Too technical to confuse people.	Places for Everyone has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 .	See appendix
JPA-2.17	Poor Consultation. The opinions of local people have not been actively sought, PfE not promoted on Rochdale Council's website, no effort to inform local people. Many completely unaware of the plans even though they live only a few hundred yards from the proposed development. An A4 sheet sellotaped to trees is not advertisement to the wider public. The consultation falls well short of the Oldham Council SCI. It is not accessible to people with poor literacy skills, and those who do not have a good command of the English	Places for Everyone has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 . Consultation was undertaken in accordance with both Rochdale and Oldham council's Statement of Community Involvement.	See appendix

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	<p>language. No attempts to engage young people. Inadequate time for people to properly engage. Too short. A large proportion of the consultation was over the school holidays. The consultation fails to meet the standards in multiple areas of HM Government Consultation Principles 2018.</p> <p>The section "Prepared the plan in accordance with the latest Local Development Scheme (LDS) for the nine Local Authorities participating in PfE, which informs the public about the current planning policies for the local authority" has not been implemented or imposed.</p> <p>Rochdale Council did not follow due process following the concerns raised at the Overview & Scrutiny Committee (July 21) regarding public consultation.</p>		
JPA-2.18	<p>No widespread, accessible publicity was undertaken for a key early stage in the development of GMSF/PfE, which is an optimal stage for public involvement.</p>	<p>Places for Everyone has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation was undertaken in accordance with both Rochdale and Oldham council's Statement of Community Involvement.</p>	Adrian Bolton
JPA-2.19	<p>Objections have not been addressed since the last iteration.</p> <p>In the previous (2016) GMSF consultation an overwhelming proportion of dissent was received for the 'Northern Gateway' areas, and yet the proposals for these areas remain virtually unchanged in this PfE plan. There is a general feeling amongst residents that development companies been given stakeholder opportunities whilst residents were kept in the dark. This is inequitable because developers have a vested interest in the release of Green Belt land for housing.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>Changes have been made to the Stakehill allocation since 2016.</p> <p>In GMSF 2016 the allocation formed part of the wider NG2 Land east and west of A627M (Oldham and Rochdale). In GMSF 2019 the allocation was renamed Policy GM Allocation 2 Stakehill, the boundary was amended to only include land to the west of the A627M thereby reducing its proximity to, and impact on,</p>	See appendix

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		<p>Tandle Hill Country Park. Furthermore, at this point a strategic area of Green Belt was retained between the A627(M) spur and Thornham Lane to maintain separation between the urban areas of Rochdale and Middleton.</p> <p>Chapter 29 of the Stakehill Allocation Topic Paper [10.01.54] sets out the main changes that have been made to the proposed allocation since GMSF 2019. The most notable change being to the amount of development that the site is expected to deliver. The site is now expected to deliver around 1,680 homes and 150,000 sq m of employment floorspace. This compares with 900 homes and 250,000 sq m of floorspace in the 2019 GMSF and 1,680 homes and 155,000 sq m of employment floorspace in the 2020 GMSF. This change has come about through the further masterplanning which has considered that the land to the north of the existing industrial estate would be more appropriate for housing than employment.</p> <p>As stated at paragraph 29.2 there has also been a further reduction in employment floorspace to 150,000sqm in the PfE Joint Plan. This reduction has resulted in some amendments to the boundary of the allocation and allowed the retention of an additional area of Green Belt land within the southern end of the allocation. As noted above this area of retained Green Belt assists with the delivery of a sustainable drainage strategy as well as an area of biodiversity and landscape value.</p> <p>Further changes are summarised at paragraph 29.5.</p> <p>No changes considered necessary.</p>	
	Walking and Cycling		
JPA 2.20	The PROW that runs south into the site from Thornham New Road is a Restricted Byway RocF Rupp 30. Motor vehicles do not have a right to use Restricted Byways unless there are Private Access Rights. In line with the NPPF statement, paragraph 100, this Restricted Byway needs to be protected from these proposals.	Restricted Byway RocF Rupp30 is not essential to access this allocation from the north and there is flexibility in how this is achieved. In line with paragraph 100 of NPPF the PROW network will be protected and maintained for the safe passage of legal users and integrated into the active and sustainable access arrangements for the allocation in line with PfE Policies JP-C 1, JP-C 4 and JP-C 5 (P199-210).	Rochdale and Bury Bridleways Association

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	<p>Paragraph 10.6 of the Stakehill Topic Paper states there will be resurfacing of Thornham Lane and Boarshaw Lane, the surface of these routes has served the legal users (walkers, cyclists, horse riders and carriage drivers) well for decades and do not need “improving”. It is important that both Thornham Lane and Boarshaw Lane are protected from these proposals in line with the NFFP statement in paragraph 100.</p>	<p>Criteria 10 of JP Allocation 2 also states that development will be required to provide good quality walking and cycling routes to connect to new and existing residential areas and local transport hubs in order to encourage sustainable short journeys to work and promote healthier lifestyles.</p> <p>In addition, the plan should be read as a whole, and criteria 6 of JP-P7 Sport and Recreation states that a network of high quality and accessible sports and recreation facilities will be protected and enhanced, supporting greater levels of activity for all ages, including by protecting and enhancing the public rights of way network. No changes are considered necessary.</p>	
JPA-2.21	<p>No mention of routes for horse riders, route suggested and would help achieve JP-P7 para 6 (c).</p>	<p>The plan should be read as a whole, and criteria 6 of JP-P7 Sport and Recreation states that a network of high quality and accessible sports and recreation facilities will be protected and enhanced, supporting greater levels of activity for all ages, including by the expansion of the network of strategic recreation routes offering longer distance opportunities for walking, cycling and horse-riding. No changes are considered necessary.</p>	<p>Rochdale and Bury Bridleways Association</p>
JPA-2.22	<p>If this land is built on well used footpaths will be lost.</p>	<p>Criteria 10 of JPA 2 states that development will be required to provide good quality walking and cycling routes to connect to new and existing residential areas and local transport hubs in order to encourage sustainable short journeys to work and promote healthier lifestyles. Paragraph 11.48 also states that investment in public transport and associated infrastructure should be complemented by a high-quality pedestrian and cycling network that links the new development to surrounding neighbourhoods and key services/facilities. No changes are considered necessary.</p>	<p>Peter Hill</p>
	<p>Infrastructure</p>		
JPA-2.23	<p>How will infrastructure be funded?</p>	<p>Policy JPA 2 sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.</p> <p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including</p>	<p>See appendix</p>

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		where appropriate green spaces, schools and medical facilities. The plan needs to be read as a whole, therefore no change is considered necessary.	
JPA-2.24	This allocation is located near a number of other development sites. The detrimental cumulative impacts of these allocation on the Green Belt, local community and transport networks needs looking at. The cumulative effects on the local infrastructure, despite the mitigations suggested, will not be sufficient.	<p>The supporting evidence base, such as the Transport Locality Assessments – Cross-boundary - Greater Manchester Spatial Framework 2020 [09.01.07] and addendum [09.01.18], considers the cumulative impact of the proposals where appropriate.</p> <p>Furthermore, a number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, critical infrastructure, schools and medical facilities. Through these policies the plan takes account of the infrastructure requirements of individual and cumulative allocations. No changes considered necessary.</p>	See appendix
JPA-2.25	There is no detailed evidence regarding how existing infrastructure, or new infrastructure could cope with this, such as roads, utilities, schools, drainage and medical practises. GPs, schools and roads at capacity and roads not maintained. Road near Stakehill has collapsed on four occasions already how will it fair with the additional traffic. Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed.	<p>PfE and Policy JPA 2 sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.</p> <p>Recognising the importance of ensuring that new development does not place undue pressure on existing social infrastructure Policy JPA 2, criteria 19 outlines that it will be necessary for the proposal to deliver social infrastructure to ensure that the needs of new and existing communities are properly met.</p> <p>In addition, in relation to schools' criteria 18 states that the development must contribute and make provision for additional primary and secondary school places, including contributions to deliver the expansion of Thornham St John's Primary School located within the allocation.</p> <p>The plan should be read as whole and there are also other policies that provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. It is considered that a proportionate evidence base has</p>	See appendix

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		been provided to support the policy, therefore no changes are considered necessary.	
JPA-2.26	Proposals include an intention to extend St Johns Thornham to accommodate the additional places required for the 1650 houses to be built. Construction Industry pre-development criteria indicates the primary places requirement will be in excess of 300. The school Governing Board and Church of England Diocese have not been approached. The existing school is a voluntary aided and not subject to Local Authority control. Without planned and deliverable additional primary school places the site cannot be delivered and therefore raises the question of soundness of the Plan.	<p>The plan should be read as a whole and Policy JP-P5 outlines how the plan will ensure the delivery of sufficient school places to respond to the demands from new housing.</p> <p>In addition, criteria 18 states that the development must contribute and make provision for additional primary and secondary school places, including contributions to deliver the expansion of Thornham St John's Primary School located within the allocation. As plans for the development of the allocation progress through the planning system the relevant discussions will be had with infrastructure providers, including regarding additional school places.</p> <p>No changes are considered necessary.</p>	See appendix
	Employment		
JPA-2.27	Major partner and industries for the employment provision should be identified.	As the site comes forward, the councils will work with interested parties to develop the employment element of the allocation.	See appendix
JPA-2.28	Warehousing comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in Greater Manchester. Storage and distribution are low-density employment i.e. it is not an efficient use of employment space. This employment is also typically low skilled and low paid. This will stifle economic growth because it imposes a ceiling on productivity. Storage and distribution are extremely vulnerable to automation. In its employment land projections, PfE bases its projections on the assumption that the employment density of I&W will not change, but this is unrealistic. Warehousing is hardly appropriate to Governments levelling up agenda.	<p>The plan should be read as a whole and criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that employment growth opportunities are well connected and accessible to all residents. It is considered that the employment allocations and the existing baseline supply across the plan area will provide a range of employment opportunities in various sectors.</p> <p>JP-J4 also sets out that 'industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors. It is particularly important to the key sectors of advanced manufacturing and logistics but is also crucial to supporting other parts of the economy and its continued provision will help to reduce inequalities' [page 116, para. 6.26].</p> <p>Local Plan's (and their evidence base) may provide further policy/ analysis on their borough's key sectors and employment opportunities.</p>	See appendix

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		<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04].</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA-2.29	The level of employment space proposed is not needed in terms of demand within the Plan period or the foreseeable future.	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. meet this need. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. See also supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04].</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix
JPA-2.30	Failure to objectively assess need - The Strategy contains a paper-based exercise to assess need for employment space/warehousing.	The spatial strategy of the Plan (Chapter 4) seeks to deliver inclusive growth by boosting significantly the competitiveness of the northern parts of Greater	See appendix

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	<p>It determined that an accelerated growth projection would be used to quantify need. This exaggerated growth would have been an unrealistic in calmer economic times, in the current economic climate more so. Submitted an analysis of the Employment Land Need determined by PfE, demonstrating that the need has not been objectively assessed. The plan has failed to consider appropriate revisions to address the impact of the pandemic. The impact of BREXIT has similarly been sidelined. The Strategy contains an ambition to build thousands of hectares of employment space/warehouses within the confines of a small motorway corridor. The Strategy does not identify how this intense concentration in the North of Greater Manchester will meet the needs of the wider conurbation. There is no analysis of accessibility for the GM labour market, or the desirability of this location to logistics businesses, outlines reasons why not a good location for logistics. There is no up-to-date review of employment land supply and demand, and no identification of key economic sectors, including their performance over time. Over 240ha of warehousing is already under development in Chadderton, and there is no current evidence of demand for this. There are additionally existing vacancies at Stakehill Industrial Estate, and the nearby Kingsway Industrial Estate (off M62 Rochdale). Oldham Council were able to provide limited information concerning other employment/warehouse capacity in the Chadderton area and at the existing Stakehill industrial estate. List submitted confirming existing vacancies in the immediate area. The proposed location is not based on an objective assessment of need. It is instead a vision built on a predetermined spatial plan.</p>	<p>Manchester, whilst ensuring that the southern area continues to make a considerable contribution to growth by making the most of its key assets. Stakehill will be of sufficient scale and quality to enable a significant rebalance in economic growth within the sub-region by boosting the competitiveness of the north of the conurbation.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04].</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>The sites submitted already form part of the GM land supply for employment floorspace as can be found on MappingGM and in the Employment Land Supply (Industry & Warehousing) [03.03.02].</p> <p>The Site Selection Background Paper [03.04.01] sets out the process used to consider the suitability of sites that had been put forward as potential locations for development. Further details can be found in the Omission report.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	

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JPA-2.31	<p>The North-East Growth Corridor may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the Oldham, Bury and Rochdale are competing for the same business, reducing the competitive effectiveness of the Northern Gateway and Stakehill. The supply of such a large quantity of floor space in such a confined area is also a sub-optimal use of employment space and will lead to low levels of job creation and storage and distribution is extremely susceptible to automation.</p>	<p>The plan should be read as a whole and criterion F and G of Policy JP-J1 sets out a commitment to supporting local job growth and ensuring that employment growth opportunities are well connected and accessible to all residents. It is considered that the employment allocations and the existing baseline supply across the plan area will provide a range of employment opportunities in various sectors.</p> <p>JP-J4 also sets out that 'industrial and warehousing accommodation is essential to a wide range of businesses across many economic sectors. It is particularly important to the key sectors of advanced manufacturing and logistics but is also crucial to supporting other parts of the economy and its continued provision will help to reduce inequalities' [page 116, para. 6.26].</p> <p>Local Plan's (and their evidence base) may provide further policy/ analysis on their borough's key sectors and employment opportunities.</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04].</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Save Royton's Green Belt
JPA-2.32	<p>Welcome that the employment space has been reduced by 5,000sqm.</p>	<p>Support welcomed.</p>	Jim McMahon MP

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JPA-2.33	Support policy but does not currently meet test of soundness because it is not justified. The specific requirement for advanced manufacturing premises is not based on an assessment of need for industry and warehousing sub-sectors, nor any other qualitative evidence. As such, insufficient evidence has been presented to justify such a prescriptive wording prioritising one form of employment over another.	Support noted. Policy JP2, is not prescriptive, criteria 1 states that there will be a suitable provision for advanced manufacturing and other key growth sectors. In addition, the plan should be read as a whole and Policy JP-J1 seeks to provide a range of sites to accommodate a wide range of opportunities and Policy JP-Strat 7 outlines that the North-East Growth Corridor will deliver a nationally-significant area of economic activity and growth. No changes are considered necessary.	Russell LDP
JPA-2.34	Support policy but does not currently meet test of soundness because it is not effective. It does not specify the development requirements which relate solely to the residential element of the allocation. The policy must provide additional clarity and differentiate the requirements for the residential and employment elements of the site to ensure that each section remains viable and can be delivered over the plan period. It is currently ambiguous.	Support noted. Criteria 3 of JP Allocation 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. The plan should be read as a whole and Policy JP Allocation 2 sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided. No changes are considered necessary.	Russell LDP
JPA-2.35	Support policy but does not currently meet test of soundness because it is not consistent with national policy. The Framework requires planning policies to be flexible enough to respond to changes in economic circumstances. To align with this the policy should not seek to specify a requirement for industry and warehousing sub-sectors, when an assessment of need has not been undertaken to this level.	Support noted. Policy JP2, is flexible, criteria 1 states that there will be a suitable provision for advanced manufacturing and other key growth sectors. In addition, the plan should be read as a whole and Policy JP-J1 seeks to provide a range of sites to accommodate a wide range of opportunities and Policy JP-Strat 7 outlines that the North-East Growth Corridor will deliver a nationally-significant area of economic activity and growth. No changes are considered necessary.	Russell LDP
JPA-2.36	Stakehill industrial site is only partially occupied (despite being heavily marketed) and in need of modernisation, which could be done without significant disruption. The proposal to extend the site over adjacent Green Belt land by 150,000 sqm primarily for storage, will ruin what is left of Chadderton's countryside.	It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper 02.01.10 provides information on the methodology for selecting the strategic allocations/ growth areas. Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.	See appendix

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		<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. It is not possible across the plan area to meet employment needs on the existing supply, as such additional land is required. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04].</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	Rural Economy		
JPA-2.37	PfE fails to address the needs of rural communities. Loss of Green Belt and green field land will have a direct negative impact on the rural economy, effectively representing loss of “business space”. It has not been positively prepared and is therefore unsound.	The plan should be read as a whole and JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that these parts of the nine districts will contribute significantly to economic growth. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play, including in terms of the economy. No changes considered necessary.	Adrian Bolton
JPA-2.38	Cannot afford to lose this farm land. This land supports our local farms which produce, Milk Eggs Meat etc. We are going to need the land more than ever since leaving the EU. Do not destroy the forever the chances of that land being used for useful food production. These products have no carbon footprint supplying residents of Rochdale. Removing this farmland is in opposition to the food security of our region.	<p>Criterion 7 of policy JP-G9 seeks to safeguard the best and most versatile agricultural land. However, the last sentence of paragraph 8.53 of the supporting text states given the overall scale of development that needs to be accommodated a limited amount of development on high grade agricultural land is necessary as it is critical to the delivery of wider development proposals.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Brexit (and Covid) on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For</p>	See appendix

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		further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . No changes are considered necessary.	
	Housing		
JPA-2.39	<p>Concern about the consistency and validity of the calculations of housing need and supply. It appears that a very high buffer has been added to provide flexibility.</p> <p>Uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.</p>	<p>Evidence has been produced in relation to the housing need and demand over the life-time of the plan period. See supporting evidence Housing Topic Paper [06.01.03]; and Greater Manchester Strategic Housing Market Assessment [06.01.02].</p> <p>The Housing Topic Paper sets out Housing Need for the PfE plan area, including how each district will meet their own housing need and the collective need of the nine districts. It sets out the proposed methodology for meeting this need across the nine districts and how this is intended to be delivered in line with the objectives of the plan as a whole.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix
JPA-2.40	The Government's Standard Method is based on Office of National Statistic 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.	<p>Evidence has been produced in relation to the housing need and demand over the life-time of the plan period. See supporting evidence Housing Topic Paper [06.01.03]; and Greater Manchester Strategic Housing Market Assessment [06.01.02].</p> <p>The Housing Topic Paper sets out Housing Need for the PfE plan area, including how each district will meet their own housing need and the collective need of the nine districts. It sets out the proposed methodology for meeting this</p>	See appendix

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		need across the nine districts and how this is intended to be delivered in line with the objectives of the plan as a whole. No changes considered necessary.	
JPA-2.41	<p>Rochdale Council have failed to examine all the alternatives in relation to optimising the density. Rochdale are not building to the recommended densities in the sites within 400m and 800m of current transport hubs and town/local centres. We do not consider exceptional circumstances as per the NPPF para 137 have been demonstrated.</p> <p>PFE does not optimise densities.</p>	<p>The plan should be read as a whole and Policy JP – H4 outlines the approach to the density of new housing. It outlines a minimum net residential density for sites dependent on a site’s location. It states that lower densities other than those set out in the policy may be acceptable where it can be clearly justified.</p> <p>No changes considered necessary.</p>	See appendix
JPA-2.42	Custom build and self-build could be considered within this application due to the desirable location of the development, the scale of housing provision and its proximity to potential employment and transport links.	The plan should be read as a whole and Policy JP-H3 states that development across the plan area should seek to incorporate a range of dwelling types and sizes including for self-build and community led building projects to meet local needs and deliver more inclusive neighbourhoods. No changes considered necessary.	Greater Manchester Housing Providers
JPA-2.43	A change in the methodology for Manchester City Council has resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed. This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.	<p>The impact of the changes made to the plan following the withdrawal of Stockport, including changes as a direct result of changes to government policy since October 2020 (which includes the change in methodology), was considered and it was determined that the PfE 2021 would result in a plan which has a substantially the same effect on the participating nine districts as GMSF 2020.</p> <p>As stated in the Housing Topic Paper [06.01.03] paragraph 6.28, the City of Manchester is meeting 100% of its LHN, including the 35% cities and urban centres uplift. No changes considered necessary.</p>	Matthew Oxley
JPA-2.44	Use canal corridor land to build affordable homes.	Policy JP-H2 sets out the approach to affordability of new housing, with detailed policy requirements to be set at the local level for each district. No changes considered necessary. As set out in criteria 3 of JPA-2 excellent design and sustainability will be achieved through masterplanning and the use of design codes for the whole site to ensure comprehensive development.	Clive Maynock

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JPA-2.45	<p>Need is for affordable homes not executive homes. There is significant demand with Chadderton and Royton having above average house prices for the borough making it unaffordable for many. The current proposal does not address these concerns, the garden village approach will impact on viability which could be utilise to subsidise a higher proportion of affordable homes.</p> <p>The proposed houses to be built in Rochdale will cost between £200,000 and £300,000 this will be beyond the means of most people in Rochdale, which has a large amount of deprivation. To meet the true needs of the local area houses need to be built for rent.</p>	<p>Increasing the supply of affordable homes is an essential component of the overall strategy, but it will be important to ensure that a diverse mix of values and tenures of new housing comes forward so that all households can meet their needs and aspirations.</p> <p>The plan should be read as a whole and Policy JP-H2 sets out the approach to affordability of new housing, with detailed policy requirements to be set at the local level for each district. No changes considered necessary.</p>	See appendix
JPA-2.46	<p>The number of proposed new houses around the Slattocks area has increased from 900 to 1680 without any detailed evidence to support how this can be managed. Local population growth in Castleton is between 6 and 7% per year this would suggest an increase in housing of 60 houses, there is no evidence to support the local need for such a large increase in housing. Exceeds governments requirements for the area.</p>	<p>The Stakehill Topic Paper [10.01.56] outlines in Section F the reasons for the increase in new houses proposed. It states that through further masterplanning the land to the north of the existing industrial estate was considered more suitable for housing than employment, due to the fact that this area already contains areas of residential development. In addition to this, the more detailed masterplanning has also demonstrated that the northern part of the allocation can accommodate an increased number of homes than that previously envisaged.</p> <p>Evidence has been produced in relation to the housing need and demand over the life-time of the plan period. See supporting evidence Housing Topic Paper [06.01.03]; and Greater Manchester Strategic Housing Market Assessment [06.01.02].</p> <p>The Housing Topic Paper sets out Housing Need for the PfE plan area, including how each district will meet their own housing need and the collective need of the nine districts. It sets out the proposed methodology for meeting this need across the nine districts and how this is intended to be delivered in line with the objectives of the plan as a whole. It is considered that a proportionate</p>	See appendix

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		evidence base has been provided to support the policy, therefore no changes are considered necessary.	
JPA-2.47	<p>Government data suggests that Rochdale's need for new houses will increase by 7000 between 2021 and 2037 with an occupancy rate of 2.73 people there is no justification for an increase of 11,434 houses in Rochdale. The PfE justifies this by giving an occupancy rate of just 1 person per household, this is disingenuous.</p> <p>PFE over-estimates the housing need - Government data states that Greater Manchester population will rise by 158,000 however the PFE plan proposes 190,000 new homes.</p>	<p>Evidence has been produced in relation to the housing need and demand over the life-time of the plan period. See supporting evidence Housing Topic Paper [06.01.03]; and Greater Manchester Strategic Housing Market Assessment [06.01.02].</p> <p>The Housing Topic Paper sets out Housing Need for the PfE plan area, including how each district will meet their own housing need and the collective need of the nine districts. It sets out the proposed methodology for meeting this need across the nine districts and how this is intended to be delivered in line with the objectives of the plan as a whole. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix
JPA-2.48	A significant proportion of population growth (and housing need) over the Plan period will be in the over 65's. These groups will want housing in highly accessible locations close to local amenities, which this proposal does not provide.	<p>The Plan should be read as a whole and paragraph 7.32 of PfE states, the ageing population will necessitate a renewed emphasis on ensuring that a diverse range of housing is available to meet the needs of older people and households. This will require new dwellings to be more adaptable, and designed with potential care needs in mind, so that older people can remain in their homes if they wish as their circumstances change. There also need to be much better options for those who would like to move, perhaps to a dwelling of a more appropriate size in a location that enables them to easily access local services and facilities, and this could help to release some existing houses for families with dependent children.</p> <p>Policy JP-H3 seeks to deliver this by ensuring new dwellings are built to accessible and adaptable standards, specialist housing for older people is provided and a mix of dwelling types and sizes is delivered, determined locally. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Gillian Boyle
JPA-2.49	Middleton, Rochdale, Oldham and Shaw Town Centres, are crying out for redevelopment, change in shopping habits means fewer retail	The Plan should be read as a whole and Policy JP Strat 12 outlines the approach to main town centres and states that opportunities to further increase	See appendix

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	<p>units are required and an introduction of artisan etc outlets required. We need affordable and green apartments/housing in our centres encouraging footfall back onto our high streets. Build up, not out.</p>	<p>the population catchments of these centres will be taken, including significantly increasing the resident population of the main town centres by providing a mix of type and size of dwellings supported by the necessary infrastructure and amenities including new and improved public spaces and green infrastructure.</p> <p>The approach to smaller centres will be outlined in districts Local Plans.</p> <p>Policy JP – H4 outlines the approach to the density of new housing. It outlines a minimum net residential density for sites dependent on a site’s location. It states that lower densities other than those set out in the policy may be acceptable where it can be clearly justified.</p> <p>No changes are considered necessary.</p>	
JPA-2.50	<p>In this day and age green credentials should be investment in the housing stock. Offer grants for home insulation, roof repair and brickwork pointing. Offer assistance to fit affordable heating and safe electrical circuits.</p>	<p>The plan should be read as a whole and good design and addressing climate change is central to the plan and a key part of the plan strategy. Paragraph 7.11 of the <u>Publication Plan</u> recognises that it will be important to make the most of the existing housing stock, stating that efforts will be made to further reduce long-term vacancies, including by seeking Government funding and working with property owners. Policy JP-S 2 ‘Carbon and Energy’ includes measures related to energy efficiency within homes and Policy JP-S4 ‘Resilience’ supports the retrofitting of existing buildings to enhance their resilience. No changes are considered necessary.</p>	Lynne Hastings
JPA-2.51	<p>Objects to this allocation. Do welcome reduced employment figure, however this at the expense of increased residential development.</p>	<p>The Stakehill Topic Paper [10.01.56] outlines in Section F the reasons for the increase in new houses proposed. It states that through further masterplanning the land to the north of the existing industrial estate was considered more suitable for housing than employment as this area already contains areas of residential development. In addition to this, the more detailed masterplanning has also demonstrated that the northern part of the allocation can accommodate an increased number of homes than that previously envisaged.</p> <p>The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10]. The allocation is considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective of boosting</p>	CPRE

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		<p>Northern Competitiveness, whilst contributing to meeting the housing need across Oldham and Rochdale.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	Public Transport / Access to Services		
JPA-2.52	Site is not best placed for access to local services and public transport.	<p>The Stakehill Topic Paper [10.01.56] in Section B outlines the allocations accessibility stating that it is served by a high frequency bus service running between Rochdale and Manchester. It also outlines future plans to provide more Service 17A services that access Stakehill Industrial Estate at peak times, alongside a new 15-minute frequency Rochdale – Oldham Service via JPA2 that improve connectivity to the site from the surrounding areas.</p> <p>Criteria 8 and 19 of JPA 2 outline ways that development will be required to support the delivery of improved public transport and deliver social infrastructure.</p> <p>The plan should be read as a whole and JP-C7 states that through the design of new developments the plan will reduce the need to travel by ensuring that community facilities, services and amenities are provided within the site or within walking distance of new development.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix

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JPA-2.53	<p>The infrastructure proposals particularly for public transport are unviable and it is difficult to see how they could ever be delivered.</p>	<p>The Stakehill Topic Paper [10.01.56] in Section E, paragraph 25.3 states that the Strategic Viability Report – Stage 2 Allocated Sites Viability Report concluded that:</p> <p>The combined residual value of the three sites (a mix of housing, mixed use and employment development) is sufficient to meet the strategic transport costs identified with further headroom of c£11m. This shows that there is potential to deliver the scheme as well as any necessary infrastructure to support the development.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Gillian Boyle
JPA-2.54	<p>There is no demand for a Railway Station in Slattocks. It has been proposed for at least 31 years and is unlikely it will go forward in this plan period.</p> <p>Deliverability - Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. The possibility of a new rail station at Slattocks is not certain.</p>	<p>Paragraph 11.48 of the supporting text to JPA 2 notes that the opportunity for a railway station at Slattocks is currently being investigated further by TfGM. This is demonstrated in the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 09.01.02 which states in paragraph 120 that over the next five years TfGM aim to complete business cases for the early delivery of stations in a number of locations including Slattocks.</p> <p>As a result, criteria 9 of JPA 2 embeds the contribution to the proposed new station as a development requirement.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	See appendix
JPA-2.55	<p>The site has limited accessibility to public transport, the use of GMAL from the boundary of the allocation site as a 'distance to' public transport access points is unrealistic and inappropriate. It uses a straight line to/from those points. These are unrepresentative of real-life conditions and could see commuters' journey distances/times to the nearest access point increased dramatically. They should therefore be recalculated for factual authenticity. The proposal to increase the bus service to Stakehill Ind Est is an aspiration with no evidence this will definitely happen.</p>	<p>The Stakehill Topic Paper [10.01.56] in Section B outlines the allocations accessibility stating that it is served by a high frequency bus service running between Rochdale and Manchester. It also outlines future plans to provide more Service 17A services that access Stakehill Industrial Estate at peak times, alongside a new 15-minute frequency Rochdale – Oldham Service via JPA2 that improve connectivity to the site from the surrounding areas.</p> <p>JPA 2 states in criteria 8 that development will be required to support the delivery of improved public transport.</p>	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

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		<p>The plan should be read as a whole and Policy JP-C7 sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate and that new developments should be located and designed to enable and encourage walking, cycling and public transport use.</p> <p>The Greater Manchester Accessibility Levels (GMAL) model has been developed to support analysis of public transport accessibility and to assist in service development, which provides a detailed and accurate measure of accessibility for any given location in the City Region for public transport (bus, rail and Metrolink), as well as flexible transport services such as Local Link. It provides a consistent approach across Greater Manchester and provides a score of a location of between 1 to 8, where 1 represents the lowest level of accessibility and 8 represents the highest.</p> <p>No changes are considered necessary.</p>	
JPA-2.56	The proposed train station at Slattocks will be driven to by people using it. Where will they park?	Paragraph 11.48 of the supporting text to policy JPA 2 notes that the delivery of a new station at Slattocks would be along with an associated Park & Ride facility. Therefore, appropriate parking would be delivered alongside any scheme for a new station. No changes are considered necessary.	Andrew Buckley
	Water and flooding		
JPA-2.57	Noted there are watercourses and ponds within and adjacent to the site, assurances are sought that sufficient safeguards will be put in place to relation to flood risk, on site and in the wider local area.	The Plan should be read as a whole and Policy JP-S5 outlines the approach to protecting the quantity and quality of water bodies and managing flood risk. No changes considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
JPA 2-58	The area is prone to flooding. The agricultural land here forms the largest and best drainage system the area has to offer It makes the region more climate resilient. The land acts as a soak away and a sponge, developing this land will not only increase local flooding, it will guarantee flooding in lowerlands like Middleton Centre. The whole area slopes downwards from the top of Tandle Hill right down	<p>Section B, part 11 of the Stakehill Topic Paper [10.01.56] summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) and the 2020 Level 2 SFRA.</p> <p>The conclusions were that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning</p>	See appendix

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	<p>to the Rochdale Canal. Building on the flood plain is never a good idea.</p> <p>The limited flood risk assessment significantly underestimates reality and acknowledges further detailed survey work is needed. Mitigation through the use of SUDS and semi-permeable vehicle standings will not adequately compensate. A desktop survey and “look at it later” attitude is not satisfactory.</p> <p>Deliverability - Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. There appears to have only been a desktop flood risk assessment– which give an incomplete description of the actual situation.</p>	<p>application stage. Therefore, no further assessment is required at this time through the GM SFRA. Policy JP-S5 outlines the approach to protecting the quantity and quality of water bodies and managing flood risk. The Plan should be read as a whole and no changes considered necessary.</p>	
	<p>Heritage</p>		
JPA-2.59	<p>Serious concerns in relation to the impact of this allocation on the setting and character of these designated heritage assets, particularly given that the development will fundamentally change the character of the wider local area.</p>	<p>The plan should be read as a whole and Policy JP-P2 of the plan sets out the approach regarding developments that affect designated heritage assets.</p> <p>Section C, Part 20, of the Stakehill Topic Paper [10.01.56] summarises the supporting evidence in relation to the historic environment relevant to the allocation and criteria 4 of the policy sets out some specific requirements in relation to the listed St John's Church and war memorial. No changes are considered necessary.</p>	<p>Save Greater Manchester's Green Belt (SGMGB)</p>
JPA-2.60	<p>Pleasing to see the Stakehill Historical Environment Assessment screened in and flagged as red 2 which hopefully will provide a further degree of protection.</p>	<p>Noted. Section C, Part 20, of the Stakehill Topic Paper [10.01.56] summarises the supporting evidence in relation to the historic environment relevant to the allocation and criteria 4 of the policy sets out some specific requirements in relation to the listed St John's Church and war memorial.</p>	<p>Kevin Brady</p>
JPA-2.61	<p>The Topic Paper draws attention to a Historic Environment Assessment created to support the Plan. This sets out a number of recommendations for this allocation including on archaeology and the need to protect existing sites and assets. The need to protect the historic environment from inappropriate development needs to be clearly addressed prior to allocation of the site.</p>	<p>Section C, Part 20, of the Stakehill Topic Paper [10.01.56] summarises the supporting evidence in relation to the historic environment.</p> <p>Criteria 5 of Policy JP Allocation 2 outlines how the development should protect and enhance archaeological features and Policy JP-P2 of the plan sets out the approach regarding developments that affect designated heritage assets (or an archaeological site of national importance). It is considered that a proportionate</p>	<p>Save Greater Manchester's Green Belt (SGMGB) Rochdale Group</p>

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		evidence base has been provided to support the policy, therefore no changes are considered necessary.	
	Utilities		
JPA-2.62	The energy and water capacity requirements for this number of dwellings is likely to be more than local networks can deliver. No statement or evidence of local deliverable energy, water or wastewater capacity is offered in the plan.	The Plan should be read as a whole and Policy JP-D1 outlines how infrastructure implementation will happen and criteria 5 specifically refers to early discussions with infrastructure providers to identify the needs of developments. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB)
JPA-2.63	Recommend some additional criteria for inclusion within the policy.	A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter. No changes are considered necessary.	United Utilities Group PLC
	Climate Change and Air Quality		
JPA-2.64	Rochdale Council has declared a 'climate emergency', the consequences of this development will be an increase in emissions and a reduction in air quality which may profoundly affect the health and wellbeing of local people. It was produced prior to the Clean Air policy being introduced. This is a green 'lung' being decimated. Extract from Government website - Each year in the UK, tens of thousands of children develop asthma as a result of traffic fumes, with the rate in Britain being the highest in Europe. Air quality monitoring undertaken locally in Dec 2019 in conjunction with the British Lung Foundation showed levels of NO2 on Rochdale Road in Slattocks exceeded safe limits.	The issue of climate change is dealt with strategically through the policies within the PfE plan including Sustainable Development (Policy JP-S 1); Heat and Energy Networks (Policy JP-S 3); Resilience (JP-S 4); Clean Air (Policy JP-S 6); Resource Efficiency (JP-S 7); Green Infrastructure (Policies JP-G2, 5, 7, 9). PFE Policy JP Allocation 13 also includes criterions that help address climate change including criterions 4 (green infrastructure), 6 (biodiversity), 8 (Public Rights of Way), 11 (green belt enhancement) and 16 (flood risk). The plan must be read as a whole. The site was also subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.	See appendix

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		<p>In addition, JPA 2 criteria 20 states that development will be required to incorporate appropriate noise and air quality mitigation. See the Stakehill Topic Paper for further detail in regard to air quality [10.01.56] chapter 21, pages 32-33]. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter. No changes are considered necessary.</p>	
JPA-2.65	<p>Failure to mitigate against pollution and climate change. The impact of congestion has not been assessed and is a serious omission for the northern corridor or Greater Manchester where the spatial strategy proposes concentrating its warehousing and logistics developments. The A 627 which runs through Chadderton, including from the M60 to the A627M, is very heavily congested. This demonstrates that the plan has failed to consider revisions to address the climate emergency.</p>	<p>The plan should be read as a whole, and Air Quality is covered by thematic policy JP-S 6 'Clean Air' in PfE 2021 which sets out a range of measures to support air quality.</p> <p>JPA 2 criteria 8 states that development will be required to support the delivery of improved public transport and criteria 20 goes on to say that development of the site will be required to incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors. See the allocation topic paper for further detail in regard to air quality [10.01.56] chapter 21, pages 32-33]. No changes are considered necessary.</p>	Save Chadderton's Green Belt
JPA-2.66	<p>There is an AQMA outside a primary school within 150m of the southern end of the site allocation. This issue will be exacerbated by the fact that proposed residents are likely to need to travel by private car to access key services and facilities etc due to this being an unsustainable development.</p>	<p>The plan should be read as a whole, and Air Quality is covered by thematic policy JP-S 6 'Clean Air' in PfE 2021 which sets out a range of measures to support air quality.</p> <p>JPA 2 criteria 8 states that development will be required to support the delivery of improved public transport and criteria 20 goes on to say that development of the site will be required to incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors. See the allocation topic paper for further detail in regard to air quality [10.01.56] chapter 21, pages 32-33]. No changes are considered necessary.</p>	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
	Brownfield		
JPA-2.67	<p>Rochdale has enough brownfield sites to meet its need without using large amounts of greenfield and Green Belt sites. The brownfield sites have not been suitable assessed. We need to see detailed business cases for why many employment, brownfield and previously developed sites have been deemed not suitable for housing. There are areas of poor housing that could come down and be redeveloped.</p>	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together, the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt release. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to</p>	See appendix

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		growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] . It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	
JPA-2.68	There are going to be many more brownfield sites available for repurposing as working from home is allowing organisations to get rid of expensive office space.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	Marie Micklethwaite
JPA-2.69	There are no assurances or policies that will enforce the brownfield first suggestion.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, it has been necessary to remove some land from the Green Belt and to allocate this land within the Plan for residential development. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA2 Stakehill. No change is considered necessary. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	Le-anne Bradbury
JPA-2.70	This site does not match the criterion of being positively prepared, as Oldham Council has stated that they would seek to develop brownfield sites rather than Green Belt sites. Having lost a large green area in the centre of Chadderton, to housing and future industrial development and major road, the criterion of justification is	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The Green Belt Topic paper	Jan and Peter Briggs

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	not satisfied in the face of reasonable alternatives and proportional evidence.	<p>[07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10]. Evidence in relation to the housing land supply can be found in the Housing Topic Paper [06.01.03] and Appendix A: Places for Everyone Housing Land Supply Statement.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA2 Stakehill. No changes are considered necessary.</p>	
JPA-2.71	Rochdale Council have failed to examine all the alternatives in relation to the fact there is a significant 74-acre Brownfield site, the former Turner Newall Asbestos Ltd at Healey and desperately in need of remediation/regeneration. We do not consider exceptional circumstances as per the NPPF para 137 have been demonstrated.	<p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together, the nine districts have been able to maximise the supply of the brownfield land and limit the extent of Green Belt and greenfield release. However, there is still a requirement to meet the housing needs of the plan area and there is insufficient land across the nine districts to meet those needs from within the existing supply. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
	Visual Amenity		
JPA-2.72	The proposals will harm the setting of Tandle Hill Park and routes around the leisure corridor of Rochdale Canal. Tandle Hill Country Park provides a highly attractive local viewpoint and whose visual amenity is likely to be detrimentally affected by the development of this site. The proposed mitigations are unlikely to fully mask the development.	<p>Criteria 6 of JP Allocation 2 states that development will be required to have regard to views from Tandle Hill Country Park in terms of the design, landscaping and boundary treatment in order to minimise the visual impact as much as possible. In addition, section C, Part 17, of the Stakehill Topic Paper [10.01.56] summarises the supporting evidence in relation to landscapes. It outlines that some landscape and visual assessment work has already been</p>	See appendix

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		<p>undertaken by the site promoters and that this work will help to inform the design and layout of any schemes to minimise as far as possible the visual impact of the development including the provision of high-quality landscaping and boundary treatments. No changes are considered necessary.</p>	
JPA-2.73	<p>The scale of development here is unacceptable.</p>	<p>The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10] and Housing Topic Paper [06.01.03] which includes boosting the competitiveness of the north of the conurbation.</p> <p>Criteria 3 of JPA2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design and criteria 14 adds that development will be required to ensure that the existing settlements and pockets of housing are taken fully into account through the masterplanning of the area. No changes are considered necessary.</p>	Gillian Boyle
JPA-2.74	<p>The plan makes an error in declaring that 1680 high value high spec homes will enhance the area. Residents of Slattocks are living in a semi rural area and residents of any new development will not view the area in the same way because it will no longer be semi-rural and this may create friction between old and new. Will remove village / rural feel and dwarf what is here and destroy the amenity, identity, character and visual characteristics of the area.</p> <p>There could also be significant impact on the character of Chadderton Fold and Chadderton Heights as creating a business park in close proximity to these neighbourhoods is a very different type of development than the status quo.</p> <p>The allocation is rural in character and the natural separation of Slattocks, Stakehill, Chadderton Heights, Boarshaw Chesham Estate and that at Thornham Fold, would be significantly compromised and</p>	<p>Section C, Part 17, of the Stakehill Topic Paper [10.01.56] summarises the supporting evidence in relation to landscapes. It outlines that some landscape and visual assessment work has already been undertaken by the site promoters and that this work will help to inform the design and layout of any schemes to minimise as far as possible the visual impact of the development including the provision of high-quality landscaping and boundary treatments.</p> <p>Criteria 3 of JPA 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes and goes on to say that the scale of the residential development on the northern part of the allocation provides an opportunity to adopt a 'garden village' approach'. Criteria 14 adds that development will be required to ensure that the existing settlements and pockets of housing are taken fully into account through the masterplanning of the area.</p>	See appendix

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	<p>is contrary to PfE plan paras 8.2, 8.56, 8.61, Policy JPA2 para 14, NPPF para 138b & c.</p> <p>The development on the Northern section of the allocation will adversely and significantly impact on the setting of the 150+ year old Thornham Cricket Club, reducing its natural rural outlook.</p>	In addition, paragraph 11.51 of the supporting text to the policy states that where practical historic field boundaries should be retained and incorporated in to the masterplan to help retain the rural character of the site. No changes are considered necessary.	
	Comments of support		
JPA-2.75	Support the allocation for development. Look forward to working with the Council and other landowners to produce a Masterplan for the allocated site.	Support noted.	Mr E. Connell
JPA-2.76	Support for the extension of Stakehill from as it will provide modernised facilities for incoming businesses. Proposing to put forward more that land for a variety of uses, such as a boat marina along the Rochdale Canal.	Support noted.	Tim Simpson
JPA-2.77	Support criteria 6 regarding views from Tandle Hill Country Park, however the scale of development will have an impact on views.	Support noted. Criteria 6 of JP Allocation 2 states that development will be required to have regard to views from Tandle Hill Country Park in terms of the design, landscaping and boundary treatment in order to minimise the visual impact as much as possible. No changes are considered necessary.	CPRE
JPA-2.78	Support inclusion of criteria 7 concerning the retention of strategic GB area.	Support noted.	CPRE
JPA-2.79	Supportive of the North East Growth Corridor, the creation of 150,000 square feet of industrial space to create sustainable manufacturing jobs and the proposed delivery of 1,680 new homes. This aligns with the strategic objective of meeting housing need and delivering a net increase in homes of all types and tenures.	Support noted.	Greater Manchester Housing Providers
JPA-2.80	Supportive of primary education provision to underpin the growth in family accommodation that the garden village will bring.	Support noted.	Greater Manchester Housing Providers
JPA-2.81	Support for allocation from a landowner - site is deliverable, free from insurmountable constraints and will deliver a number of benefits.	Support noted.	Milne Trust

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JPA-2.82	<p>Support allocation of JPA2 and comments on Redrow Homes' commitment to commence delivery of homes as soon as feasibly possible. Makes comments suggesting various amendments to JPA2 to make policy justified, effective and compliant with national policy. Proposed changes include an amendment so picture 11.6 is clearer; remove retained green belt wedge; amend wording re site capacity; amend requirement for design code; amend development contribution references - social infrastructure is required but not defined and there is a lack of site specific Infrastructure Delivery Plan for the site; and comments on deliverability and how they envisage they can move relatively fast due to the amount of land they are in control of.</p>	<p>Support and comments noted. No changes considered necessary in relation to amendments suggested.</p> <p>Picture 11.6 is consistent with other allocations and considered to include the relevant information.</p> <p>The Green Belt wedge, as set out in paragraph 11.49 is to provide separation between Rochdale and Middleton and to protect Tandle Hill Country Park.</p> <p>The capacity and location of residential development is based on the masterplanning of the site to date.</p> <p>The text in relation to the design code is considered appropriate to ensure a comprehensive approach to the infrastructure of the site is achieved.</p> <p>In relation to social infrastructure no changes are considered necessary, PfE and Policy JPA 2 sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided. Recognising the importance of ensuring that new development does not place undue pressure on existing social infrastructure Policy JPA 2, criteria 19 outlines that it will be necessary for the proposal to deliver social infrastructure to ensure that the needs of new and existing communities are properly met.</p> <p>In addition, in relation to schools' criteria 18 states that the development must contribute and make provision for additional primary and secondary school places, including contributions to deliver the expansion of Thornham St John's Primary School located within the allocation.</p> <p>A number of other policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities. It is considered that a proportionate evidence base has been provided.</p>	Redrow Homes Ltd

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JPA-2.83	Support the wording of the allocation.	Support noted.	Historic England
	Site Selection		
JPA-2.84	<p>The site does not comply with the specified criteria 1,4, 5 and 7. It is not previously developed or well served by public transport, it would be reliant on cars, it is not within 800m of a main town centre, it will not have an impact on urban regeneration and it is not land where developing it would deliver significant local benefits by addressing a major local problem/issue.</p> <p>Rochdale Council have failed to examine all the alternatives as JPA2 fails to comply with 6 of the 7 Site Selection criteria. It only complies with Criteria 7 Land that would deliver significant local benefits by addressing a major local problem/issue. We do not consider exceptional circumstances as per the NPPF para 137 have been demonstrated.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10]. Evidence in relation to the housing land supply can be found in the Housing Topic Paper [06.01.03] and Appendix A: Places for Everyone Housing Land Supply Statement.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA2 Stakehill. No changes are considered necessary.</p>	See appendix
JPA-2.85	The Plan has not adequately assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy. It is not a suitable and sufficient assessment.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10]. Evidence in relation to the housing land supply can be found in the Housing Topic Paper [06.01.03] and Appendix A: Places for Everyone Housing Land Supply Statement.</p>	See appendix

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		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA2 Stakehill. No changes are considered necessary.	
JPA-2.86	The site selection process has been opaque with no explanation as to why some sites in the “call for sites” were excluded from the plan. The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.	The site has been selected following the site selection process and methodology set out in the Site Selection Background Paper (July 2021) [03.04.01] and the associated appendices (1-9). The purpose of which is to identify the most sustainable locations for residential and employment development that is capable of achieving the plan’s Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. No changes are considered necessary.	See appendix
	Pollution		
JPA-2.87	Concerns regarding light pollution caused by this development including the impact on local residents and wildlife.	Criteria 3 of JP Allocation 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development and Criteria 14 adds that development will be required to ensure that the existing settlements and pockets of housing are taken fully into account through the masterplanning of the area. No changes are considered necessary.	See appendix
JPA-2.88	Concerns regarding noise pollution	JPA 2 Criteria 20 states that development of the site will be required to incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors. No changes are considered necessary.	See appendix
	Viability		
JPA-2.89	Viability figures in Viability Report Stage 2 are misleading. Discusses flats for the north section and the Redrow Plan makes no mention of them. This leads to spurious and misleading figures for the Blended rate in the table. The viability figures are made all the more misleading by the apparent estimation of other costs, such as the plot itself. We struggle, as non-professionals, to assess whether these costs and the claimed viability of the site present an accurate picture. Same for the South section.	No changes are considered necessary, as noted in the Stakehill Topic Paper [10.01.56] the masterplan for the northern section of the allocation is indicative and does not indicate specific housing types. Page 35 of the Strategic Viability Assessment Stage 2 Report [03.01.04] does show a relatively small number of apartments as part of a broad mix to be tested in terms of viability. At this stage the purpose of the viability work is to demonstrate that overall the site is viable and deliverable.	Gordon Tilstone
	Design		

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JPA-2.90	Objects to the requirement for a design code to be provided and suggests there is no evidence underpinning this requirement.	As per JPA 2 development at Stakehill will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. In addition Policy JP-P1 'Sustainable Places' outlines the ways in which all development should contribute towards beautiful, healthy and varied places. No changes are considered necessary.	Milne Trust
	Ground Conditions		
JPA-2.91	The allocation abuts a number of old mine workings which is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed. Topic paper states ground investigations be a condition of planning approval – these measures should be undertaken prior to deciding if the allocation is viable.	Section 12 of the Stakehill Topic Paper [10.01.56] summarises the findings of the initial ground conditions review. It concludes that the review did not identify any major constraints and a Preliminary Risk Assessment (PRA) would still be required to determine whether any further intrusive investigations are required to establish if and what remedial techniques are necessary to ensure the site is suitable for its intended end use. This would be a condition relating to any future planning approval. No changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.92	The potential for ground contamination particularly from adjacent uses and impacts on ground water and safety of the development on site need to be more carefully considered prior to the allocation of the site. Topic paper states ground investigations be a condition of planning approval – these measures should be undertaken prior to deciding if the allocation is viable.	Section 12 of the Stakehill Topic Paper [10.01.56] summarises the findings of the initial ground conditions review. It concludes that the review did not identify any major constraints and a Preliminary Risk Assessment (PRA) would still be required to determine whether any further intrusive investigations are required to establish if and what remedial techniques are necessary to ensure the site is suitable for its intended end use. This would be a condition relating to any future planning approval. No changes considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
	Carbon Neutral / Renewable Energy		
JPA-2.93	Welcome the aim contained in Policy JP-S 2. However, its emphasis is on housing and suggests there is insufficient focus on industrial, who are higher-level users of energy. Businesses should be encouraged to use green technologies such as PV/air/ground-source heating and/or green roofing. Green roofs have the added advantage of masking large distribution-type units from distant/high viewpoints	Policy JP-S2 outlines a range of measures to support Greater Manchester reduce greenhouse gas emissions. These measures apply to all development types, therefore no changes considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA 2.94	The evidence base does not include any estimates of the likely scale of carbon emission consequences of the developments proposed and green space lost - this is a serious omission.	The plan should be read as a whole and Policy JP-S2 outlines a range of measures to support Greater Manchester reduce greenhouse gas emissions, therefore no changes considered necessary.	Jeanette Tilstone

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JPA-2.95	In paragraph 1.52 of the plan regarding becoming carbon neutral by 2038 it outlines a commitment to keeping fossil fuels in the ground. It is well known that the Green Belt holds it in the ground, another reason to keep it in tact and refrain from building on it. This space acts as a carbon sink.	The plan should be read as a whole and Policy JP-S2 outlines a range of measures to support Greater Manchester reduce greenhouse gas emissions. Measures listed includes keeping fossil fuels in the ground, therefore no changes considered necessary.	See appendix
	General		
JPA-2.96	PfE does not explain how the quality of the environment will, or indeed can, be preserved in the face of the widespread destruction of Chadderton's green spaces.	PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan to deliver the Vision and Objectives. As the Plan should be read as a whole, this approach is considered consistent with NPPF. No changes are considered necessary.	Save Chadderton's Green Belt
JPA-2.97	Although agreeing there is a linked infrastructural element to JPA2, it should be seen as two/three separate allocations. Policy JPA2, para 7, indicates the creation of a natural separation (Green Belt/wildlife corridor). This, along with the A627M Slattocks Spur, provide an obvious north/south divide to the allocation as proposed. The Topic Paper also refers to two separate allocations – north and south and section 26 on phasing talks about a 3 pronged approach.	Whilst there are distinct elements to the allocation it is important for the site to be considered as a whole to ensure that infrastructure requirements are met. Criteria 3 of JPA 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. No changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.98	Site is not proximal to disadvantaged communities.	The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas. Further detail on the site's selection is contained within the Stakehill Topic Paper [10.01.56] . Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.	Save Chadderton's Green Belt
JPA-2.99	Concerned regarding the responses received from local councillors regarding this allocation. The councillors who have come up with the plan themselves do not know what they want to use this land for and have made no attempt to provide any research or analysis into why this Green Belt land was earmarked for development.	Cannot comment on what feedback has been provided from councillors. It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth	Save Chadderton's Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		areas. Further detail on the site's selection is contained within the Stakehill Topic Paper [10.01.56] . Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.	
JPA-2.100	An illegal commercial strategy by the council - using the promise of land owned by private individuals as the basis for pre-development costs and strategic documents	The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas. Further detail on the site's selection is contained within the Stakehill Topic Paper [10.01.56] . Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.	Peter Wright
JPA-2.101	To evidence the unsound nature of the plan, the three elected local councillors for area all voted against the plan in opposition to their own majority led Council.	Places for Everyone has been prepared in accordance with the <u>Town and Country Planning (Local Planning) (England) Regulations 2012</u> . Details of the process can be found at paragraphs 1.59 to 1.68 of the <u>Publication Plan</u> and the introductory chapter (pages 3 to 5) of the Stakehill Allocation Topic Paper [10.01.56] . No change to the policy is considered necessary.	Peter Wright
JPA-2.102	Concerns development here would increase crime and would be forced to move.	Criteria 3 of JP Allocation 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. Policy JP-P1 Sustainable Places identifies a set of key attributes that all development, wherever appropriate, should be consistent with. Criterion 8 states development must be safe, including by designing out crime and terrorism, and reducing opportunities for anti-social behaviour. Therefore, no changes are considered necessary.	Jane Ridley and Michael Morley
JPA-2.103	The all-in-one garden centre was not included in the previous GMSF plan and is now included in this. This is a significant deviation from the previous plan.	The Stakehill Topic Paper [10.01.56] outlines in Section F the reasons for the inclusion of the garden centre site. It states that the site was included as a result of further masterplanning.	See appendix
	Plan Wide		
JPA-2.104	Needs to be a judicial review to determine if PfE is legally compliant before it proceeds any further. Number of reasons given as to why PfE will not have substantially the same effect as GMSF2020. Legality not established. The numerical additions are significant and	Comment not relevant to the content of JPA2 Stakehill. Matter addressed elsewhere.	See appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	as such substantial enough to demand that a full re write is done ad a fresh application should be made to pass Reg 18.		
JPA-2.105	Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change. It is the opposite of sustainable development and causes multiple problems in the area	No change is considered necessary. PfE is a strategic planning document and is consistent with NPPF. The Plan sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan to deliver the Vision and Objectives. The Plan should be read as a whole, this approach is considered consistent with NPPF. As such, no changes are considered necessary.	See appendix
JPA-2.106	Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. There is no indication of how delivery targets will be maintained.	The Housing Topic Paper [06.01.03] sets out Housing Need for the PfE plan area, including how each district will meet their own housing need and the collective need of the nine districts. It sets out the proposed methodology for meeting this need across the nine districts and how this is intended to be delivered in line with the objectives of the plan as a whole. No changes are considered necessary.	See appendix
JPA-2.107	No details have been given about when each authorities Local plans will be available.	Timetables for Local Plan production are outlined in each districts Local Development Scheme.	See appendix
JPA-2.108	There are no details of how Duty to Co-operate will be achieved particularly an issue with Stockport's withdrawal.	The Duty to Co-operate Statement and Log of Collaboration [01.01.01] outlines how the Duty to Co-operate, including with Stockport, has been and will continue to be addressed.	See appendix
JPA-2.109	The entire evidence base is inconsistent, with policies and calculations spanning differing time periods.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA 2.	Jeanette Tilstone
JPA-2.110	Supporting documentation not provided by independent consultants which does highlight a conflict of interest.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA 2.	Steven Dyson
JPA-2.111	Where is all the money coming from to fund these changes? We already pay too much council tax.	Policy JP Allocation 2 sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided. A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including	Julia Simpson

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		where appropriate green spaces, schools and medical facilities. Further details regarding delivery and implementation can be found in the Delivering the Plan chapter.	
	Roads / Transport		
JPA-2.112	Road safety - With more traffic and pedestrians in the area, and with the council encouraging more to people to cycle, an increase in road accidents is inevitable. HGVs are a significant factor. Serious accidents are common near Slattocks roundabout and no traffic calming has been proposed. There are a number of schools in the vicinity and adding this much traffic including HGVs is not safe.	<p>Criteria 13 of JP Allocation 2 states that development will be required to improve access arrangements in and around Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible and to make appropriate provision for lorry parking.</p> <p>In addition, the plan should be read as a whole and JP-C6 outlines ways in which the plan will support the more efficient and sustainable movement of freight. Criteria 5 of the policy says that this will be achieved by ensuring that new development makes appropriate provision for deliveries and servicing in terms of road safety, traffic congestion and environmental impacts. JP-C7 on transport requirements of new developments gives further information on making the appropriate provision for deliveries and servicing in ways that meet road safety requirements and reduces traffic congestion. No changes are considered necessary.</p>	See appendix
JPA-2.113	The North site allocation is 1000 executive homes with a single access point onto an already gridlocked A-road. Using highway design regulations and software it would be illegal to suggest and promote a 1,500-vehicle single exit point onto a dangerously rated main road. With 2 cars per household this could be up to 3,200 cars – more as children grow and get licences. Local traffic based on 1,680 homes, suggests anywhere between 1,500 to 4,000 extra private vehicles given the scale of housing & employment space proposed.	<p>Transport Locality Assessment – Cross Boundary [09.01.07] and Transport Locality Assessment Addendum – [Cross Boundary Allocations (2) Northern Gateway (Stakehill)] [09.01.18] consider the impact on highway infrastructure. Potential mitigation measures have been identified and the Locality Assessment concludes the impact arising from the allocation as well as the cumulative impact of other allocations in PfE to be less than severe subject to the implementation of mitigation.</p> <p>Additional work at the planning application stage will refine the existing Locality Assessment and mitigation required, with Policy JP-C 7 setting out a requirement for planning applications to be accompanied by a Transport Assessment and Travel Plan where appropriate. In addition, Criteria 13 of JP Allocation 2 states that development will be required to improve access arrangements in and around</p>	See appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible. Therefore, no change to the plan is considered necessary.	
JPA-2.114	Development of the Oldham part of this site is dependent on development of the Rochdale part first as there is no access only from Rochdale. As Rochdale currently has many other industrial sites on the go, and other more important proposed sites, and with many of the current Stakehill units currently empty, nothing will happen here for 50 years.	<p>It is considered that an appropriate supply of sites has been identified to meet employment land needs for the plan area. Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology.</p> <p>The land supply data set out in tables 6.1 and 6.2 in the Plan, demonstrates that there is insufficient land in the urban area to meet the identified need.</p> <p>See also supporting evidence Economic Forecasts for Greater Manchester [05.01.01] and Employment Topic Paper [05.01.04].</p> <p>No changes are considered necessary.</p>	John Shepherd
JPA-2.115	From Sudden to Slattocks the road becomes narrower and becomes impossible for HGVs to pass. HGVs cause houses to shake when they pass by.	<p>Criteria 13 of JPA 2 states that development will be required to improve access arrangements in and around Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible and to make appropriate provision for lorry parking.</p> <p>In addition, the plan should be read as a whole and JP-C6 outlines ways in which the plan will support the more efficient and sustainable movement of freight. Criteria 5 of the policy says that this will be achieved by ensuring that new development makes appropriate provision for deliveries and servicing in terms of road safety, traffic congestion and environmental impacts. JP-C7 on transport requirements of new developments gives further information on making the appropriate provision for deliveries and servicing in ways that meet</p>	Louise Hulme

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		road safety requirements and reduces traffic congestion. No changes are considered necessary.	
JPA-2.116	The housing in the plan appears to be of high value. As we do not have the local employment capacity to support the perceived incomes of the purchasers, we must assume that these people will be commuters, who will in turn increase traffic in the areas.	<p>Policy JP-C 1 'An Integrated Network' sets out measures for ensuring a pattern of development that minimises both the need to travel and the distance travelled by unsustainable modes to jobs, housing and other key services; and includes measures to increase cycling and walking infrastructure.</p> <p>The Stakehill Topic Paper [10.01.56] in Section B outlines the allocations accessibility stating that it is served by a high frequency bus service running between Rochdale and Manchester. It also outlines future plans to provide more Service 17A services that access Stakehill Industrial Estate at peak times, alongside a new 15-minute frequency Rochdale – Oldham Service via JPA2 that improve connectivity to the site from the surrounding areas.</p> <p>Criteria 8 and 19 of JPA 2 outline ways that development will be required to support the delivery of improved public transport and deliver social infrastructure.</p> <p>As confirmed in Policy JP-H3, the precise mix of dwelling types and sizes will be determined through district local plans, masterplans and other guidance, in order to reflect local circumstances and deliver an appropriate mix of dwellings across the plan area as a whole. No changes considered necessary.</p>	Lynne Hastings
JPA-2.117	TLAA-CB-S (para 4.3) suggests “a new southerly link to Mills Hill station could form part of any expansion of the industrial estate”. No modelling or associated investigations are presented for this.	The reference to the link to Mills Hill cannot be found in that paragraph of the Locality Assessment. Therefore, it is not possible to respond to this comment.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.118	The TLAA-CB-S (para 9.1.4) uses a number of irrelevant junctions in its assessment.	The junctions listed in paragraph 9.1.4 were considered relevant to the assessment and considered the impact of this allocation on the wider transport network of the whole proposed Northern Gateway Strategic allocation. Transport Locality Assessment – Cross-boundary [09.01.07] page C38 Paragraph 9.2 indicates the junctions it was not required to model	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA-2.119	TLAA-CB-S Section 7 - Parking, notes that Rochdale & Oldham are yet to agree on parking standards for developments.	Parking standards will be addressed through the Local Plans.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.120	Deliverability - Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. Access to the Northern section of the site via the secondary route, Thornham New Road, is made difficult by the narrowness of the roadway. No mitigation has been proposed for this.	Criteria 13 of JP Allocation 2 states that development will be required to improve access arrangements in and around Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible and to make appropriate provision for lorry parking. In addition, the plan should be read as a whole and JP-C7 on transport requirements of new developments gives further information on how the plan will require new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.121	TLAA-CB-S Section 8 - Allocation Trip Generation and Distribution, Table 4, shows a 'Development Quantum' residential build to 2025 of only 55 homes and a total of 1,736. This total figure does not match the allocation proposals of 1,680 and no explanation is given for the difference.	This is just a presentational error and the 1,736 should read as 1,681. It appears that the 55 which is assumed to be built by 2025 has been added to the total number of homes (1,681) in error. However, this is not a soundness issue and therefore no changes are necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.122	TLAA-CB-S para 10.1.3 makes irrelevant mention of JPA16-Cowlshaw. Its location would not be expected to have any effect on traffic in/around JPA2-Stakehill.	The transport impacts of the allocations need to be considered cumulatively with other PfE site allocations. JPA 16 Cowlshaw was considered close enough to Stakehill to be considered as part of its assessment.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.123	TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the "17A serves Stakehill in peaks". It is a single time service at approximate 05.30 Monday to Friday only.	The Stakehill Topic Paper [10.01.56] in Section B outlines the allocations accessibility stating that it is served by a high frequency bus service running between Rochdale and Manchester. It also outlines future plans to provide more Service 17A services that access Stakehill Industrial Estate at peak times, alongside a new 15-minute frequency Rochdale – Oldham Service via JPA2 that improve connectivity to the site from the surrounding areas.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>JP2 states in criteria 8 and 19 that development will be required to:</p> <p>Support the delivery of improved public transport to and within the area to promote more sustainable travel and improve linkages to the employment opportunities from surrounding residential areas; and</p> <p>Given the scale of the new housing provision it will be necessary for the proposal to deliver social infrastructure to ensure that the needs of new and existing communities are properly met.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA-2.124	<p>No reference in policy is made to infrastructure requirements on the SRN or even a requirement for highway access to be considered in order to deliver the site. At this stage the transport evidence is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements.</p>	<p>Transport Locality Assessment – [09.01.07] (pages C53 to C57) – GMSF2020 and Transport Locality Assessment Addendum – [Cross Boundary Allocations (2) Northern Gateway (Stakehill)] [09.01.18] (pages 32 to 38) provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the addendum report states (on page 32) that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02]. We are also working alongside National</p>	National Highways

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.	
JPA-2.125	<p>Locality Assessments - shows that pre and post mitigation measures, traffic will continue to be over capacity ‘limits’ at peak times. Para 12.1.11 states “further modelling work will be required to support the Transport Assessment for the allocation...” whilst Para 12.1.6, in relation to junction capacity, states “a figure of 100% or over illustrates that flows exceed the operational capacity at the Junction and increased vehicle queuing and delay are likely to occur”. The proposed cycle lane will narrow the highway through Castleton centre causing a potential traffic bottleneck on the principal route between Rochdale & Manchester. These issues should be addressed as a matter of urgency before this site is given further consideration.</p>	<p>Modelling work has been undertaken using the Greater Manchester Variable Demand Model (GMVDM) with a constrained and high side scenario. The constrained and high side model runs take account of traffic associated with the PfE allocations. This report has considered the allocation in isolation and the allocation in context with the wider PfE programme using the ‘high side’ flows which are considered to be a worst case.</p> <p>Transport Locality Assessment Addendum – [Cross Boundary Allocations (2) Northern Gateway (Stakehill) [09.01.18] concludes in paragraph 18.1.1 that “the traffic impacts of the allocation are not severe. Whilst the modelling work does forecast that junctions may experience capacity issues, they are not significantly worse than those experienced in the reference case situation and the modelling work is considered to be a ‘worst case’ scenario”.</p> <p>The Locality Assessment work indicates that transport improvements can be identified to accommodate the traffic generated by the allocation especially when the impact of active travel and public transport improvements are considered as detailed in PfE Policies JP-C 3, JP-C 4 and JP-C 5. These measures will be identified through the planning process and the preparation of a Transport Assessment. No changes are considered necessary.</p>	Save Greater Manchester’s Green Belt (SGMGB) Rochdale Group
JPA-2.126	<p>TLAA-CB-S Section 8 - Allocation Trip Generation and Distribution Table 5 - only gives figures for passenger cars “Units are in PCU (passenger car units/hr)”. This excludes commercial vehicle movements. The proposed expansion of Stakehill Ind Estate and potential inclusion of a lorry park (Policy JP Allocation 2, para 13), by over 150% would result in a significant increase in commercial vehicles entering/exiting the LRN and SRN. This would all use the Slattocks Roundabout junction (no other entry/exits are planned for) further contributing to traffic movements and potential congestion issues.</p>	<p>TfGM’s Strategic Model used to forecast the impact of PfE allocations includes a SATURN highway model which requires traffic flows to be converted to passenger car units (PCU’s). A series of factors are used to do this for the different components identified in observed traffic counts. These factors set out in the Department of Transport’s TAG guidance as stated in Strategic Modelling Technical Note –Places for Everyone 2021 [09.01.04] page 6. A full account of the modelling process is presented in this document.</p>	Save Greater Manchester’s Green Belt (SGMGB) Rochdale Group

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JPA-2.127	The first sentence of TLAA-CB-S para 9.13 makes no sense – it is just wrong.	This sentence is correct. It is describing the Strategic Road Network to the east of the site. No changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.128	TLAA-CB-S para 14.1.3 states "Junction modelling has however demonstrated that the Junction will operate within capacity at 2040." There is failure to explain how this conclusion has been reached.	This is a conclusion based on the junction modelling as set out in the Locality Assessment [09.01.18] .	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
JPA-2.129	TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the "17A serves Stakehill in peaks". It is a single time service at approximate 05.30 Monday to Friday only.	Comment noted.	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
	No comments		
JPA-2.130	Plan is unsound. No specific comments provided.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA-2 Stakehill.	See appendix
JPA-2.131	Plan is sound. No specific comments provided.	Noted.	See appendix
JPA-2.132	No comments provided	Noted.	See appendix

Appendix

Policy JP Allocation 2 – Stakehill

Table 1. Row JPA-2.1

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Murray	NA
Mike	Seer	NA
Paul	Roebuck	NA
Peter	Hill	NA
Lorraine	Murray-Lawton	NA
Robert	Bennett	NA
Lindsay	Earnshaw	NA
Ann	Guilfoyle	NA
Caroline	Williams	NA
Rebecca	Gonzalez	NA

Table 2. Row JPA-2.2

Given Name	Family Name	On behalf of company/organisation or individual
Matthew	Oxley	NA
Philip	Schikora	Save Chadderton's Green Belt
Julia	Simpson	NA
Conor	Costello	NA
Ruth	Wilson	NA
John	McKenniff	NA
Adele	Costello	NA
Tracy	Raftery	NA
Jeanette	Tilstone	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 3. Row JPA-2.3

Given Name	Family Name	On behalf of company/organisation or individual
Marie	Micklethwaite	NA
Gillian	Boyle	NA
Peter	Wright	NA
Andrew	Buckley	NA
David	Killion	NA
Sylvia	Wild	NA
Jeanette	Tilstone	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 4. Row JPA-2.7

Given Name	Family Name	On behalf of company/organisation or individual
Marie	Micklethwaite	NA
Geoffrey	Green	NA
Le-anne	Bradbury	NA
Andrew	Buckley	NA
Jeanette	Tilstone	NA

Table 5. Row JPA-2.8

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Murray	NA
Valerie	Matterson	NA
Carol	Baxendale	NA
Angela	Wilkinson	NA
Lynne	Hastings	NA
Conor	Costello	NA
Adele	Costello	NA
H	Oldham	NA

Given Name	Family Name	On behalf of company/organisation or individual
Marie	Micklethwaite	NA
Peter	Hill	NA
Louise	Stoddard	NA
Julia	Block	NA
Jeanette	Tilstone	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 6. Row JPA-2.9

Given Name	Family Name	On behalf of company/organisation or individual
Mike	Seer	NA
Conor	Costello	NA
John	McKenniff	NA
Adele	Costello	NA
		GM Bird Recording Group
Louise	Stoddard	NA
Tracy	Raftery	NA
Jane and Michael	Ridley and Morley	NA
Carol	Baxendale	NA
Angela	Wilkinson	NA
Jackie	Copley	CPRE
Ross	Harding	The Wildlife Trust
Jeanette	Tilstone	NA
Christopher	Tansley	NA
John	McKenniff	NA
Louise	Hulme	NA
Gordon	Tilstone	NA

Table 7. JPA-2.12

Given Name	Family Name	On behalf of company/organisation or individual
Chris	Sear	NA
Jill	Simpson	NA

Table 8. JPA-2.16

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Conor	Costello	NA
Adele	Costello	NA

Table 9. JPA-2.17

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
Matthew	Oxley	NA
		Save Chadderton's Green Belt
Clive	Maynock	NA
Conor	Costello	NA
Caroline	Williams	NA
Joanne	Buckley	NA
Adele	Costello	NA
Louise	Stoddard	NA
Jill	Simpson	NA
Jeanette	Tilstone	N/A

Table 10. JPA-2.19

Given Name	Family Name	On behalf of company/organisation or individual
		Save Chadderton's Green Belt
Jeanette	Tilstone	N/A

Table 11. JPA-2.23

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA

Table 12. JPA-2.24

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

Table 13. Row JPA-2.25

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
		Save Chadderton's Green Belt
John	Williams	NA
Karen	Williams	NA
Conor	Costello	NA
Ruth	Wilson	NA
Caroline	Williams	NA
Adele	Costello	NA
Rebecca	Gonzalez	NA
Karen	Lever	NA
Jane and Michael	Ridley and Morley	NA
Louise	Hulme	NA
Jeanette	Tilstone	N/A
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 14. JPA-2.26

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
Peter	Wright	N/A

Table 15. JPA-2.27

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Julia	Simpson	NA

Table 16. Row JPA-2.28

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
Gillian	Boyle	NA
		Save Royton's Green Belt
Chris	Sear	NA
Malcom	Pye	NA
Le-anne	Bradbury	NA
Andrew	Buckley	NA
Tracy	Raftery	NA
Jill	Simpson	NA

Table 17. JPA-2.29

Given Name	Family Name	On behalf of company/organisation or individual
Gillian	Boyle	NA
Le-anne	Bradbury	NA

Table 18. JPA-2.30

Given Name	Family Name	On behalf of company/organisation or individual
		Save Chadderton's Green Belt
Caroline	Williams	NA
Steven	Dyson	NA
David	Killion	NA
Tracy	Raftery	NA
Louise	Hulme	NA
Jill	Simpson	NA
Jeanette	Tilstone	N/A

Table 19. JPA-2.36

Given Name	Family Name	On behalf of company/organisation or individual
Christopher	Tansley	NA
John	Williams	NA
Karen	Williams	NA
Chris	Sear	NA
Valerie	Matterson	NA
Caroline	Williams	NA
Louise	Stoddard	NA
Zoe	Sherlock	NA

Table 20. JPA-2.38

Given Name	Family Name	On behalf of company/organisation or individual
John	Williams	NA
Peter	Hill	NA
Karen	Williams	NA
Ruth	Wilson	NA
Louise	Hulme	NA
Jeanette	Tilstone	NA

Table 21. JPA-2.39

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Gillian	Boyle	NA
Julia	Simpson	NA
Chris	Sear	NA
Le-anne	Bradbury	NA
Valerie	Matterson	NA
Caroline	Williams	NA
Steven	Martin	NA

Table 22. JPA-2.40

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Chris	Sear	NA
Conor	Costello	NA
Steven	Martin	NA
Adele	Costello	NA

Table 23. JPA-2.41

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

Table 24. JPA-2.45

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

Given Name	Family Name	On behalf of company/organisation or individual
Conor	Costello	NA
		Greater Manchester Housing Providers
Ian	Goffin	NA

Table 25. JPA-2.46

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
John	Williams	NA
Peter	Hill	NA
Conor	Costello	NA
Steven	Martin	NA
Adele	Costello	NA
Louise	Stoddard	NA
Tracy	Raftery	NA

Table 26. JPA-2.47

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
Peter	Hill	NA
Conor	Costello	NA
Steven	Martin	NA
Adele	Costello	NA
Sylvia	Wild	NA

Table 27. JPA-2.49

Given Name	Family Name	On behalf of company/organisation or individual
John	Williams	NA
Karen	Williams	NA
Lorraine	Murray-Lawton	NA
Caroline	Williams	NA

Table 28. JPA-2.52

Given Name	Family Name	On behalf of company/organisation or individual
		Save Greater Manchester's Green Belt (SGMGB)
Gillian	Boyle	NA
		Save Chadderton's Green Belt

Table 29. JPA-2.54

Given Name	Family Name	On behalf of company/organisation or individual
Karen	Williams	NA
Geoffrey	Green	NA
Jeanette	Tilstone	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 30. JPA-2.58

Given Name	Family Name	On behalf of company/organisation or individual
John	Williams	NA
Peter	Hill	NA
Karen	Williams	NA
Clive	Maynock	NA
Susan	Jagger	NA
Conor	Costello	NA
Caroline	Williams	NA
John	McKenniff	NA
Adele	Costello	NA
Rebecca	Gonzalez	NA
Louise	Stoddard	NA
H	Oldham	NA
Carol	Baxendale	NA
Angela	Wilkinson	NA
Lynne	Hasting	NA
Gordon	Tilstone	NA
Jeanette	Tilstone	NA

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

Table 31. JPA-2.64

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
Le-anne	Bradbury	NA
Conor	Costello	NA
Andrew	Buckley	NA
Adele	Costello	NA
Louise	Hulme	NA
Jeanette	Tilstone	NA
Paul	Kalee-Grover	Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
Christopher	Tansley	NA
John	McKenniff	NA
H	Oldham	NA
Jill	Simpson	NA
Julia	Block	NA
Gordon	Tilstone	NA

Table 32. JPA-2.67

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Goffin	NA
		Save Chadderton's Green Belt
John	Williams	NA
Karen	Williams	NA
Clive	Maynock	NA
Malcom	Pye	NA
Le-anne	Bradbury	NA
Geoffrey	Green	NA
Conor	Costello	NA

Given Name	Family Name	On behalf of company/organisation or individual
Ruth	Wilson	NA
Andrew	Buckley	NA
John	McKenniff	NA
Adele	Costello	NA
Jeanette	Tilstone	NA
Karen	Lever	NA
Louise	Stoddard	NA
H	Oldham	NA
Sylvia	Wild	NA
Kevin	Brady	NA
Marc	O'Driscoll	NA

Table 33. JPA-2.72

Given Name	Family Name	On behalf of company/organisation or individual
Gillian	Boyle	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group
Jackie	Copley	CPRE

Table 34. JPA-2.74

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Hill	NA
Conor	Costello	NA
Joanne	Buckley	NA
Andrew	Buckley	NA
John	McKenniff	NA
Adele	Costello	NA
Jane and Michael	Ridley and Morley	NA
Jim	McMahon	N/A
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 35. JPA-2.84

Given Name	Family Name	On behalf of company/organisation or individual
John	McKenniff	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 36. JPA-2.85

Given Name	Family Name	On behalf of company/organisation or individual
John	McKenniff	NA
Jeanette	Tilstone	NA

Table 37. JPA-2.86

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Julia	Simpson	NA

Table 38. JPA-2.87

Given Name	Family Name	On behalf of company/organisation or individual
Tracy	Raftery	NA
John	McKenniff	NA
Gordon	Tilstone	NA

Table 39. JPA-2.88

Given Name	Family Name	On behalf of company/organisation or individual
Mike	Seer	NA
Jane and Michael	Ridley and Morley	NA
H	Oldham	NA
John	McKenniff	NA
Julia	Block	NA
Gordon	Tilstone	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 40. JPA-2.95

Given Name	Family Name	On behalf of company/organisation or individual
Angela	Wilkinson	NA
Jeanette	Tilstone	NA

Table 41. JPA-2.103

Given Name	Family Name	On behalf of company/organisation or individual
Conor	Costello	NA
Adele	Costello	NA

Table 42. JPA-2.104

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Peter	Hill	NA
Julia	Simpson	NA
Le-anne	Bradbury	NA
Valerie	Matterson	NA
Geoffrey	Green	NA
Conor	Costello	NA
Steven	Martin	NA
Adele	Costello	NA

Table 43. JPA-2.105

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 44. JPA-2.106

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA

Given Name	Family Name	On behalf of company/organisation or individual
Julia	Simpson	NA

Table 45. JPA-2.107

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Julia	Simpson	NA

Table 46. JPA-2.108

Given Name	Family Name	On behalf of company/organisation or individual
Adrian	Bolton	NA
Matthew	Oxley	NA
Ruth	Wilson	NA
		Save Chadderton's Green Belt

Table 47. JPA-2.112

Given Name	Family Name	On behalf of company/organisation or individual
		Save Chadderton's Green Belt
Conor	Costello	NA
Ruth	Wilson	NA
Adele	Costello	NA
Louise	Hulme	NA

Table 48. JPA-2.113

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Wright	NA
Geoffrey	Green	NA
Conor	Costello	NA
Andrew	Buckley	NA
Adele	Costello	NA
Rebecca	Gonzalez	NA
Louise	Stoddard	NA

Given Name	Family Name	On behalf of company/organisation or individual
Louise	Hulme	NA
		Save Greater Manchester's Green Belt (SGMGB) Rochdale Group

Table 49. JPA-2.130

Given Name	Family Name	On behalf of company/organisation or individual
Janet	Allred	NA
Jonathan	Wigman	NA
L J	Park	NA
Sandra	Radcliffe	NA
Mary	Sharkey	NA
Carol	Mole	NA
Julie	Darbyshire	NA
Rob	Shield	NA
Barbara	Wilkinson	NA
Juliet	Eastham	NA

Table 50. JPA-2.131

Given Name	Family Name	On behalf of company/organisation or individual
George	Clancy	NA
Elena	Toader	NA
James	Clark	NA
Terence	Kelly	NA
Stephen	Kershaw	NA
Joe	Heys	NA
Adam	Birds	NA

Table 51. JPA-2.132

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Christie	NA
Kim	Scragg	NA