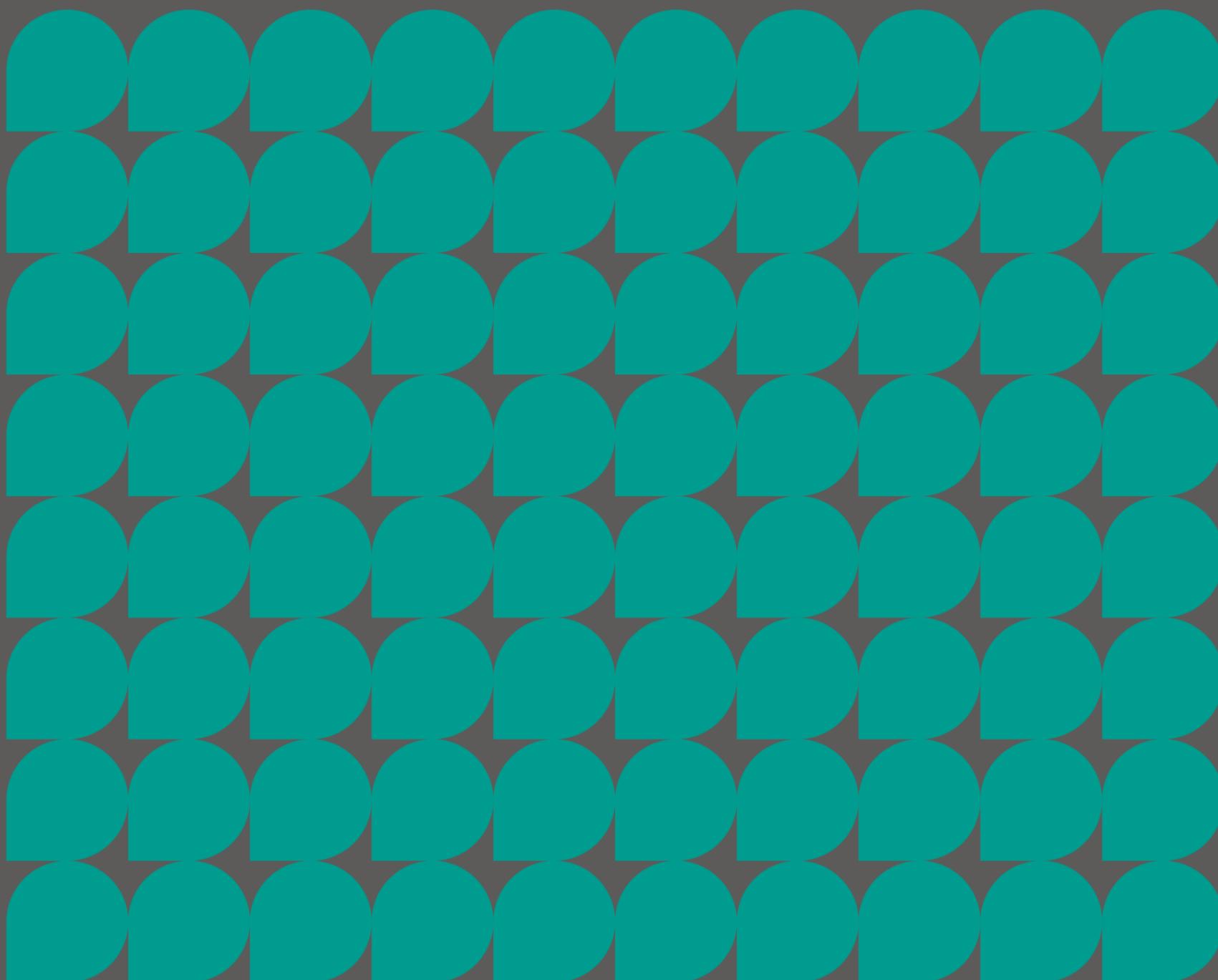


# Places for Everyone

Allocations: Oldham Issues Summary

February 2022



# Chapter 11 – Strategic Allocations (Oldham)

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

## PfE 2021 Policy JP Allocation 12 – Beal Valley

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Principle of development / Use of Green Belt</b>		
JPA12.1	<p>Disagree with loss of Green Belt. Plan is considered unsound due to encroachment on Green Belt. Development on Green Belt should be removed from the plan.</p> <p>Inappropriate for any land to be released from the Green Belt to accommodate new development when the impacts, particularly the environmental, are considered to be so significant and much of the land would need to be set aside for green infrastructure, a purpose which it is already satisfactorily performing under the Green Belt designation.</p> <p>Abandon the building plans for this valued area and remove site from Plan.</p> <p>A judicial inquiry in Leeds, Yorkshire, has ruled that the destruction of green belt land is illegal, so why is the obliteration of Green Belt proposed.</p>	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> 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 Beal Valley Allocation Topic Paper <a href="#">10.05.32</a> 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 <a href="#">07.01.25</a>. Section C of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> summarises the evidence in relation to the Green Belt.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal valley. No changes are considered necessary.</p>	See Appendix
JPA12.2	Sets a precedent for developers to justify building on Green Belt.	As set out at paragraph 8.54 of the PfE Plan our Green Belt was originally designated in full in 1984 as part of the Greater Manchester Green Belt. It has since seen a series of minor amendments through individual district plans. The scale of development that needs to be accommodated within the Plan area up to 2037 means that some changes to the Green Belt boundaries are necessary in line with the paragraphs 140 and 141 of NPPF. The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area.	Robert Mayall

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Development in the redefined Green Belt will be assessed in line with national planning policy and Local Plans, with proposals considered on a case by case basis. No changes are considered necessary.	
JPA12.3	There are no exceptional circumstances. Contradicts Green Belt legislation to keep in check the unrestricted sprawl of large built-up areas. Site provides those 'green lung' areas which minimise urban sprawl between built up conurbations.	<p>The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25]. Chapter 14 of the Beal Valley Allocation Topic Paper [10.05.32] also sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.</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 Beal Valley allocation is considered to meet the following exceptional circumstances criteria - 1, 5, 6 and 7. In addition, the site also provides the opportunity to develop a wetland catchment area, which as well as being an attractive feature of the site, will allow for the site to take a strategic approach to flood risk management and provide opportunities for upstream flood storage.</p> <p>The Plan is considered sound and that an appropriate evidence base has been prepared to support the Plan and release of land from the Green Belt. No changes are considered necessary.</p>	See Appendix
JPA12.4	As Green Belt, predominantly green field land, any development within the proposed allocation area will have an impact on the existing site environment.	<p>Section C of the Beal Valley Allocation Topic Paper [10.05.32] sets out the evidence base in relation to the Environment, including Green Belt. In addition to the <a href="#">Publication Plan</a> as a whole, Policy JPA12 Beal Valley contains a number of criteria that relate to the protection and enhancement of the natural environment 10, 11, 12, 13 and 14).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No change is considered necessary.</p>	SGMGB Oldham Groups

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.5	The landscape character assessment acknowledges that the release of the land from the Green Belt would constitute high harm to the purposes of the Green Belt – the mitigation proposed is not of substantial weight to justify the harm. The majority of the proposed mitigation is only required due to the proposed release and use for housing and there would still be an impact of medium sensitivity.	<p>A summary of the evidence from the Landscape Character Assessment (2018) <a href="#">[07.01.06]</a> in relation to the allocation and the recommended mitigation measures can be found in chapter 17 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a>.</p> <p>Reflecting the above, criteria 9 and 10 of JPA12 Beal Valley require development on the site to:</p> <p>Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. A Landscape Appraisal is required to inform any planning application; and</p> <p>Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary</p>	SGMGB Oldham Groups
JPA12.6	If only 21ha of the 53 ha is going to be subject to development, the release a substantially larger area will only result in future pressure for development on the remaining land at the potential cost of any mitigation secured. It is not appropriate to release land from the Green Belt solely for this to become a mitigation buffer. Issues regarding viability are likely to lead to increased pressure on that part of the site proposed for green infrastructure.	<p>Criterion 11 of JPA12 Beal Valley seeks to ensure the protection from development of a large green wedge, between the main development area and the Metrolink line to the east and its enhancement as part of the multi-functional green infrastructure network, and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment. This takes forward the recommendation from the high-level indicative concept planning work <a href="#">[10.05.01 and 10.05.02]</a> to incorporate high-quality landscaping and multi-functional green infrastructure that will minimise the visual impact on the wider landscape, whilst recognising the topographical constraints of the site and the use of the Metrolink line along the eastern boundary as an appropriate Green Belt boundary.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No change is considered necessary.</p>	SGMGB Oldham Groups
JPA12.7	Note that under the proposed greenbelt areas, there is only one for Oldham. This is unfair.	Appendix 1 to the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary <a href="#">[07.01.25]</a> sets out the justifications for proposed additions to the Green Belt. No changes are considered necessary.	Terry Millett

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.8	<p>Insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been insufficient assessment of reasonable alternatives. In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.</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 <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The 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 <a href="#">[02.01.10]</a>. Evidence in relation to the housing land supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> 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 JPA12 Beal Valley. No changes are considered necessary.</p>	Save Shaw's Green Belt
JPA12.9	<p>The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.</p>	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">[07.01.25]</a>. Furthermore, chapter 14 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Save Shaw's Green Belt
	<b>Scale of Development</b>		
JPA12.10	<p>Proposed green belt loss heavily weighted in, and unjustly imposes a disproportionate burden on Shaw and Crompton area, which worsened by the cumulative impact of sites in the</p>	<p>The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE. As shown in Table 7.13 of the Publication Plan the allocations in Oldham proposed through PfE provide a total of 2,176 homes out of a total land supply of 13,131 (2020-37) across the borough. With regards to the specific sites mentioned information can be found at</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	housing land supply. No regard for impact on services and road infrastructure.	<p>section 5 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>, Beal Valley Topic Paper <a href="#">[10.05.32]</a> and the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>. As outlined in the reasoned justification for each policy, the three sites are considered to be in sustainable and accessible locations and in successful and attractive neighbourhoods with connection to neighbouring areas. Beal Valley and Broadbent Moss also have the potential for greater connectivity through the proposed new Metrolink stop, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond. 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 <a href="#">[02.01.10]</a> and these allocations are considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective of boosting Northern Competitiveness, whilst contributing to meeting the housing need across Oldham.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
	<b>Housing</b>		
JPA2.11	Area is unsuitable for housing.	<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 <a href="#">[02.01.10]</a>. The allocation is considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective of boosting Northern Competitiveness, whilst contributing to meeting the housing need across Oldham.</p> <p>The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE.</p> <p>As set out in paragraph 11.132 of the <a href="#">Publication Plan</a> it is considered that the site is in a sustainable and accessible location, on the edge of a large area of open land and in a strong housing market which offers the potential to provide a range of high-quality housing in an attractive setting. It is located near to existing residential communities, including Shaw Town Centre, and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this site and the Broadbent Moss site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond.</p>	Linda Newton

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		In line with the site selection process and methodology the site is considered suitable for housing. No changes are considered necessary.	
JPA12.12	<p>No need for the level of housing proposed in the area, whether affordable or not. Level of development is not wanted.</p> <p>Disagree with use of standard methodology and considered that a lower figure should be used that reflects local land constraints resulting from preservation of the Green Belt and OPOL. The additional housing and warehousing exceeds the governments predicted requirements of the area.</p> <p>Plan appears to be seeking to overprovide for housing land.</p> <p>The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply.</p>	<p>Evidence has been produced in relation to the housing and employment land demand over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the plan to be based on the housing and employment land need figures, derived from the evidence base. See supporting evidence Housing Topic Paper <a href="#">[06.01.03]</a>; Greater Manchester Strategic Housing Market Assessment <a href="#">[06.01.02]</a>; Economic Forecasts for Greater Manchester <a href="#">[05.01.01]</a>; Employment Land Needs in Greater Manchester <a href="#">[05.01.02]</a> and Employment Topic Paper <a href="#">[05.01.04]</a>.</p> <p>The Housing Topic Paper <a href="#">[06.01.03]</a> 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. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 677 new homes per year. The PfE sets out a proposed housing requirement for Oldham of 677 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper. Compared to the GMSF 2019, Oldham's housing need, as set out in the PfE 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.13	Will not provide affordable / eco-homes. Need environmentally friendly housing.	Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policy states that development will be required to "provide for affordable homes in line with local planning policy requirements". A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.	Vicky Harper

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Specifically, policy JP-S 2 'Carbon and Energy' includes measures related to energy efficiency within homes. No changes are considered necessary.	
JPA12.14	Proposals for 400 additional homes on the old Shop Direct Mill site off Linney Lane, Shaw. This needs to be considered in the context of plans under PfE.	The Shop Direct site at Linney Lane forms part of the housing land supply (SHA2131). Details can be found on <a href="#">MappingGM</a> and in the council's Brownfield Register and Strategic Housing Land Availability Assessment. No changes are considered necessary.	Debbie Abrahams MP
JPA12.15	Need more investment in existing housing stock. Replace the run-down housing around Oldham rather than ruining this countryside.	Paragraph 7.11 of the <a href="#">Publication Plan</a> 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, but any significant further reduction in vacancies could begin to make it more difficult for people to move home. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement. In any event, Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock. In addition there are council programmes that support the investment in stock such as <a href="#">Warm Homes Oldham</a> and <a href="#">Empty Homes</a> . The approach set out in the Publication Plan is considered appropriate. No changes are considered necessary.	See Appendix
JPA12.16	When a large proportion of the local population cannot afford to purchase their first home, councils should be able to step in and assist instead of selling off the family silver in the form of green belt land.	The Delivering the Plan chapter of the <a href="#">Publication Plan</a> sets out our approach to implementation and delivery, recognising that the level of growth proposed (across the plan as a whole) will require substantial amounts of investment from both the public and the private sector. It will be important that the Plan is supported by sources of funding and delivery mechanisms. However, many of the necessary actions lie outside its scope and will be taken forward through other strategies, plans and programmes. No changes are considered necessary.	Lynn Hastings
JPA12.17	Due to the topography, site levels, flood risk, ecology and infrastructure requirements there is a significant risk that affordable housing will be mitigated through viability and this should be safeguarded.	Policy JP-H2 supports the provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), with locally appropriate requirements being set by each local authority. This is further reflected in criterion 3 of Policy JPA12 Beal Valley, which sets out that affordable homes will be sought in line with local planning policy requirements.	Greater Manchester Housing Providers

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		With regards to viability, Policy JP-D2 Developer Contributions states that developers will be required to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. The policy sets out the circumstances in which viability assessments will be accepted. Where it is accepted that viability should be considered as part of the determination of an application, the Local Planning Authority should determine the weight to be given to a viability assessment alongside other material considerations. No changes are considered necessary.	
JPA12.18	P&D have control of part of the northern section of the site, which is already delivering a number of homes on a brownfield site. There are also other smaller parcels of land to the north, which are suitable and deliverable for housing but these can be delivered outside of the proposed policy given they are already within the defined urban area of Oldham.	Paragraph 11.129 of Policy JPA12 Beal Valley acknowledges that there are two brownfield sites in the northern part of the allocation [site A and B on the high-level indicative concept plan]. These are not included in the residential capacity set out in Policy JPA12 Beal Valley, as they are already identified as part of the potential housing land supply, as set out in Oldham's current Strategic Housing Land Availability Assessment (SHLAA). Details can be found on <a href="#">MappingGM</a> and in the council's Brownfield Register and SHLAA. These sites are, however, included within the red line, recognising their links to the allocation and ensuring they form part of the comprehensive development of the wider site. No changes are considered necessary.	PD Northern Trust Asset Management
JPA12.19	Consider aspiration for 480 homes ambitious and will not be met due to site constraints within the main body of the site.	Site constraints have been considered through the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.02]</a> and Beal Valley indicative concept plan <a href="#">[10.05.01]</a> . Evidence prepared to inform Policy JPA 12 Beal Valley has been summarised in the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> .  It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	PD Northern Trust Asset Management
JPA12.20	The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of the policy. It should be amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.	The approach taken in PfE is appropriate and consistent with NPPF. It is considered that detailed affordable housing targets are most appropriately set at the local level, through Local Plans, whilst ensuring that they contribute to the overall ambition of PfE and Policy JP-H2 Affordability of New Housing. No changes are considered necessary.	Save Shaw's Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.21	<p>Affordability problems in the Oldham Borough are severely distorted, stemming mostly from Saddleworth. Effectively affordability is being used as an exceptional circumstance. It is highly questionable that the affordability adjustment complies with NPPF #140. These houses are not being built to serve housing need, but rather to expand market choice.</p> <p>Allocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.</p>	<p>The Greater Manchester Strategic Housing Market Assessment <a href="#">[06.01.02]</a> (Chapter 3.2 Standard methodology: Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228)) provide detailed information on the need for affordable housing in Greater Manchester, including Oldham. As detailed in Housing Topic Paper <a href="#">[06.01.03]</a> (Chapter 2 (Paragraphs 2.8 to 2.14)), the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. This includes that an adjustment should be made to consider market signals, specifically the affordability of housing. We do not consider that exceptional circumstances exist to justify departure from the standard methodology.</p> <p>Policy JPA12 Beal Valley requires development on the site to provide for affordable homes in line with local planning policy requirements. Paragraph 11.131 goes on to state that this will include a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Local evidence in the form of Oldham's Housing Strategy and Local Housing Needs Assessment will inform the Local Plan affordable housing policy.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Save Shaw's Green Belt
JPA12.22	Brownfield Housing Fund Allocation to be accessed.	The Delivering the Plan chapter of the Publication Plan sets out our approach to implementation and delivery, recognising that the level of growth proposed (across the plan as a whole) will require substantial amounts of investment from both the public and the private sector. It will be important that the Plan is supported by sources of funding and delivery mechanisms. However, many of the necessary actions lie outside its scope and will be taken forward through other strategies, plans and programmes. No changes are considered necessary.	Save Shaw's Green Belt
	<b>Brownfield</b>		
JPA12.23	<p>Brownfield sites need to be utilised first.</p> <p>Building on derelict land / vacant buildings should be priority.</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, it has been necessary to remove some land from the Green Belt and to allocate this land within the Plan for residential development.	See Appendix

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		<p>The details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.24	<p>We have put in a FoI request (in conjunction with Save Royton's Greenbelt) regarding the Local Plan consultation Oldham has 76 unlisted mills, some of which should be convertible to housing. We filed an FOI and the council refused to give us the information. By doing so, and by failing to survey this land for GMSF/PfE Oldham's GB release is not compliant with NPPF #141. We believe a Brownfield First Approach has not been followed. This information on Brownfield Sites, we believe is vital to the decision making behind the plan. Without this information it is impossible to have an informed opinion on the use of Brownfield sites and their regeneration.</p>	<p>Regarding comments about the Freedom of Information (FoI) request, this is not a matter for PfE and would be considered separately to the plan preparation process.</p> <p>Please see row JPA12.23 for further information regards the Plan's clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. A large number of previously-developed sites suitable for housing have been identified as part of the housing land supply (as shown in the council's Brownfield Register and Strategic Housing Land Availability Assessment) which in Oldham has been informed by the draft emerging Mill Strategy.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Save Shaw's Green Belt
	<b>Highways / access / transport</b>		
JPA12.25	<p>Roads are already congested – reference made to Cop Road and Ripponden Road. Not helping carbon footprint.</p>	<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 locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within chapter 10 of the Beal Valley Topic Paper <a href="#">[10.05.32]</a>, Transport Locality Assessments – Introductory</p>	See Appendix

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		Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> . It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	
JPA12.26	There is a need to tackle climate change. The resultant pollution/congestion will kill; carbon neutrality unobtainable - this will increase emissions in an era of Climate Catastrophe as endorsed. Question how this addresses climate change, reduce emissions and congestion.	The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The site was also subject to assessment as part of the <a href="#">Strategic Environmental Assessment</a> within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.  PfE contains a vast number of thematic policies all of which contribute to addressing climate change – it contains policies on 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). The plan must be read as a whole. Notwithstanding this PFE Policy JP Allocation 15 includes criteria that help address climate change including criteria 4 (green infrastructure), 6 (biodiversity), 8 (Public Rights of Way), 11 (green belt enhancement) and 16 (flood risk). No changes are considered necessary.	See Appendix
JPA12.27	Not close to major rail links and motorways.	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.  The site is considered to be in a sustainable and accessible location, on the edge of a large area of open land and in a strong housing market which offers the potential to provide a range of high-quality housing in an attractive setting. It is located near to existing residential communities, including Shaw Town Centre, and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this site and the Broadbent Moss site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond. No changes are considered necessary.	Paul Roebuck
JPA12.28	The transport impact of developments has been considered against a backdrop of proposed enhancement measures set out in the Greater Manchester Transport Strategy 2040, the	Paragraph 1.1.4 of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> sets out how a suite of transport-related evidence base documents have been prepared to inform preparation of the Publication plan and examine its implications on	SGMGB Oldham Groups

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>implementation of which is not guaranteed and therefore there is a potential flaw in the assessments.</p>	<p>transport in Greater Manchester. This includes the Greater Manchester Transport Strategy 2040 <a href="#">[09.01.01]</a> and Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a>. The Delivery Plan sets out practical actions planned to deliver the 2040 Transport Strategy and achieve the ambitions of the GMCA and the Mayor, providing a coordinated approach to transport investment. This includes those measures identified to support the Beal Valley and Broadbent Moss allocations. The proposed spine road and Metrolink stop / Park and Ride facility are both identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[0901.02]</a> with the aim to complete a business case for its early delivery (see Map 2).</p> <p>Furthermore, the modelling work used to inform the Transport Locality Assessments is considered to be a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area, and that junctions which are considered to operate over capacity in the 2040 model years, both with and without mitigation, are attributed not to the introduction of development trips, but to the cumulative impact of wider growth. As such the objective of mitigation scenarios is to suitably accommodate the proposed development trips for this allocation, rather than fully amending wider traffic concerns (see paragraph 19.1.6 of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a>).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.29	<p>Insufficient highways infrastructure in place for scale of development proposed. New dual carriageway roads would need to be built through from Shaw to Oldham town centre. The scale of development is of a concern from cumulative traffic impact perspective due to close geographic proximity of other proposed allocated development sites in the immediate local area.</p> <p>Concerns regarding diverting onto Ripponden Road. Particularly as if the M62 closes people use main roads in the area as a diversion only.</p>	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. A list of the interventions considered necessary to support Policy JPA12 Beal Valley can be found at Table 2 of the Beal Valley Topic Paper <a href="#">[10.05.32]</a>. Recommendations from the Locality Assessment have been reflected in JPA12 Beal Valley.</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Improved transport is a critical obstacle to be overcome to ensure the success of the plan. Existing motorways are constrained due to congestion. Need to ensure that the transport infrastructure is in place before other building takes place.</p>	<p>Furthermore, 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 (as required by Policy JP-C7 Transport Requirements of New Development). 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>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.30	<p>Tram network is already overused.</p>	<p>Paragraph of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. Paragraph 15.1.2 of the Locality Assessment also states that the introduction of the Metrolink stop is expected to contribute to resolving the general issue regarding congestion on the surrounding road corridors, specifically Oldham Road, as this is the main thoroughfare into the centre of Oldham as well as supporting access to the allocation by sustainable means. No changes are considered necessary.</p>	Linda Newton
JPA12.31	<p>While the site is unlikely to lead to SRN impacts on its own, its proximity to Broadbent Moss (1,450 homes &amp; employment floorspace) in addition to other allocated development sites in the local area means that the site may lead to impacts on a cumulative basis. Transport evidence underpinning this allocation 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 – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, 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>	National Highways

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<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 the GM Transport Strategy 2040 <a href="#">[09.01.01]</a> and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a>. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.32	<p>Concerns regarding the spine road. Not considered to be required and will impact significantly on the local population with regards to the loss of enjoyment of property, noise, vibration, worse air quality.</p> <p>Ability of the spine to reduce local traffic volumes is questioned.</p> <p>Concerns regarding where the spine road will start and end.</p>	<p>As stated at paragraph 11.133 of the Publication Plan, the proposed spine road will create a north/south corridor, providing the opportunity to improve connectivity of the site to Shaw Town Centre, Broadbent Moss to the south and to the wider area. The spine road will help to alleviate existing congestion in the surrounding area and mitigate the impact of the proposed developments at Beal Valley and Broadbent Moss.</p> <p>Further information regarding the spine road can be found in the Transport Locality Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN. The proposed spine road is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Neil Shoreman
JPA12.33	<p>Post-pandemic traffic levels unknown. Traffic using the present Oldham Road, will be significantly reduced compared with pre pandemic levels if we are to believe that significant numbers of people will continue to work from home or have different work patterns compared with pre pandemic. The demands on that road will be far less than considered through PfE.</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 <a href="#">[05.01.03]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No change is considered necessary.</p>	Neil Shoreman

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JPA12.34	<p>The housing proposed 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, it is assumed that these people will be commuters, who will in turn increase traffic in the area.</p>	<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>It is considered that the site is in a sustainable and accessible location, on the edge of a large area of open land. It is located near to existing neighbouring residential communities and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this and the Beal Valley site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond., as it set out within the allocation supporting text. Further detail on the site's proposed access arrangements is contained within the Beal Valley Topic Paper <a href="#">[10.05.32]</a>, chapter 10] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Lynn Hastings
JPA12.35	<p>Policy requirement to see a link road through the entire site is questionable due to topography.</p>	<p>With regards to the spine road specifically, as stated above the high-level concept plan prepared to support the allocation is indicative and as such the route may change depending on further evidence, the transport assessment and as part of the comprehensive masterplan and design required as part of any development and which must be agreed with the local authority (see criterion 1 of Policy JPA12). Indeed, the need for further work to ascertain whether the extension of the spine road is deliverable in the northern part of the site is highlighted in the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>.</p> <p>This is reflected in criterion 5 of Policy JPA12 Beal Valley, which states that any development will be required to safeguard a route from the proposed spine road through the northern part of the site, as part of any development, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond.</p>	PD Northern Trust Asset Management

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		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	
JPA12.36	The statement that sites do not place an unacceptable impact on highway safety or severe impact on the road network cannot be so definitive without the anticipated baseline being secured as confirmed in paragraph 10.8 which states "For some allocations it is recognised that there is further work to be done in order to develop a solution that fully mitigates the site's impact on the transport network".	<p>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 (as required by Policy JP-C7 Transport Requirements of New Development). 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>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	SGMGB Oldham Groups
JPA12.37	<p>Comments have been made against various access points / routes to the proposed allocation:</p> <p>Fenton Street unsuitable and unsafe as access to the site.</p> <p>Closure of Bulcote Lane will make residents of Moorside stranded. This lane is used for school children and workers. It is a green route.</p> <p>Proposed access point to the south provides no footpath for pedestrian access and no assessment if there is sufficient land available to facilitate such provision.</p> <p>Site is ill-served only by a narrow road.</p> <p>Concerns about access from Oldham Rd.</p> <p>Enhancements are required to facilitate improved access.</p> <p>Various vehicular and pedestrian access points are potentially available to the west and a new link to the south would be required - access to east not possible due to presence of metrolink.</p>	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage. Further detail on the sites access arrangements are contained within the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a>.</p> <p>Recommendations from the Locality Assessment have informed criteria 4, 5 and 6 in Policy JPA12 Beal Valley. Further information is provided at paragraph 11.133 of the Publication Plan.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.38	Reliance on the implementation of the Bee Network is not appropriate to sufficiently address the safety concerns.	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 <a href="#">[09.01.01]</a> and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> . No changes are considered necessary.	SGMGB Oldham Groups
JPA12.39	Concerns regarding whether the Metrolink provision would be adequate given the number of homes proposed across this area. Plans to build a new Metrolink stop are integral to the Broadbent Moss development and these must be hardwired into the development plans at the earliest opportunity in order for the development to reach its full potential.	<p>Paragraph of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. Paragraph 15.1.2 of the Locality Assessment also states that the introduction of the Metrolink stop is expected to contribute to resolving the general issue regarding congestion on the surrounding road corridors, specifically Oldham Road, as this is the main thoroughfare into the centre of Oldham as well as supporting access to the allocation by sustainable means. Potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer.</p> <p>Reflecting this criterion 7 of Policy JPA14 Broadbent Moss requires any development to contribute towards the delivery of a new Metrolink stop and park and ride facility, along with the Beal Valley allocation, which in part will help to serve both allocations and improve their accessibility and connectivity. The proposed Metrolink stop and Park and Ride is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.40	Question asked regarding what will happen to the public footpath that appears to be on the path of the spine road.	The Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Many of the Public Rights of Way are integral to the historic Shaw and Crompton Beating of the Bounds walk and Crompton Circuit walks.</p>	<p>development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). In relation to multi-modal access the Locality Assessment recommends a - permeable network for pedestrian and cyclist priority within the development, to promote and encourage sustainable transport modes and accessibility for non-vehicular traffic.</p> <p>Recommendations from the Locality Assessment have informed Policy JPA12 Beal Valley, including criteria 6 and 7.</p> <p>Furthermore, Policy JP-C 7 on Transport Requirements of New Development requires new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.41	<p>If the spine road were to go ahead, where will construction traffic gain access from? Use of Bullcote Green / Bullcote Lane would be unacceptable.</p>	<p>Policy JP-C7 Transport Requirements of New Development requires new development to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments. The policy lists a number of criteria for how this will be achieved, including ensuring Construction Management Plans are produced for developments, where appropriate, to mitigate construction logistics and environmental impacts including air quality and noise on the surrounding area and encourage sustainable deliveries.</p> <p>The Plan needs to be read as a whole. No changes are considered necessary.</p>	Neil Shoreman
JPA12.42	<p>The car park at Shaw and Crompton Metrolink is already at capacity and more space is urgently needed here, so we welcome the proposal to develop a new Metrolink stop at Cop Lane and would urge consideration for developing other stops elsewhere on the Rochdale – Oldham Metrolink line (for example, at Dunwood Park) to improve accessibility.</p>	<p>The proposed Metrolink stop and associated Park and Ride facility at Cop Lane has been identified to support delivery of PfE, and specifically policies JPA12 Beal Valley and JPA14 Broadbent Moss. Any additional stops along the Rochdale – Oldham Metrolink line would need to be considered by TfGM and Oldham Council in line with the Greater Manchester Transport Strategy 2040 <a href="#">[09.01.01]</a> and Our Five Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a>. No change to the policy is considered necessary.</p>	Cllr Howard Sykes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.43	<p>Blanket requirement for development proposals within the Beal Valley allocation to contribute to the delivery of the new Metrolink stop and Park and Ride facility at Broadbent Moss to the south should be reconsidered. Does not meet Planning Obligations tests. Given proximity of the northern section of the site to the existing Metrolink stop at Shaw and Crompton it is not considered necessary, although accept that it may be more appropriate for land falling within the southern area of JPA12. No basis on which to request that Site C makes a financial contribution to any other existing or proposed new Metrolink station. The supporting text to JP Allocation 12 should be amended to reflect this.</p>	<p>Criterion 7 of Policy JPA12 requires development to contribute to the delivery of the new Metrolink stop and new park and ride facility as part of the neighbouring Broadbent Moss allocation, which in part will help to serve and improve the accessibility and connectivity of both allocations. This reflects the findings and recommendations of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>. This highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. The Locality Assessment states that potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer. The proposed Metrolink stop and Park and Ride is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2). No changes are considered necessary.</p>	See Appendix
JPA12.44	<p>Concern raised that proposed highway arrangements could prejudice the development of client's site (Duke Mill) therefore request that discussion take place at the earliest opportunity ahead of any future planning application for the site.</p>	<p>The high-level concept plan prepared to support the allocation is indicative and as such it is recognised that the route of the proposed spine road may change depending on further evidence, the transport assessment and as part of the comprehensive masterplan and design required as part of any development and which must be agreed with the local authority (see criterion 1 of Policy JPA12). Indeed, the need for further work to ascertain whether the extension of the spine road is deliverable in the northern part of the site is highlighted in the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>.</p> <p>This is reflected in criterion 5 of Policy JPA12 Beal Valley, which states that any development will be required to safeguard a route from the proposed spine road through the northern part of the site, as part of any development, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Trendairo (Duke Mill)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA12.45	<p>Para 11.133 should be amended to reference Sumner Street and Mosshey Street as main points of access to parts of the Allocation. Lesser roads, such as Bullcote Lane and Meek Street are specifically made reference to and it is an error to not cite Sumner Street and Mosshey Street to the north of the allocation also as main points of access. The supporting text to JP Allocation 12 should be amended to reflect this.</p>	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] and Transport Locality Assessment Addendum – Oldham [09.01.23] have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). Paragraph 5.1.8 of the Locality Assessment acknowledges that whilst Sumner Street (and Fenton Street) directly bound the site, a review of the carriageway widths and the presence of on-street parking consider that these roads are unsuitable for use as either primary or secondary access, although they could be opened up for pedestrian and cycle access. This evidence supersedes the high-level indicative concept plan which indicates a potential access off Sumner Street.</p> <p>Reflecting the above, Policy JPA12 Beal Valley requires any development on the site to provide for appropriate access points (criterion 4) and take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network (criterion 6).</p> <p>With regards to Mosshey Street, criterion 5 states that on development on the site will be required to safeguard a route from the proposed spine road through the northern part of the site, as part of any development, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	Peter and Diane Martin
	<b>Contamination / land</b>		
JPA12.46	<p>Site is unsuitable due to landfill. The area has been a mining area.</p>	<p>Paragraphs 12.1 and 12.2 of the Beal Valley Allocation Topic Paper [10.05.32] consider ground conditions recognising that the high-level indicative concept plan report indicates that the majority of the site is uncontaminated, however to the north is an industrial area and a landfill site which will require site investigation. It states that any development would therefore need to take account of the fact that a large proportion of the site has been subject to landfill. As such, Phase 1 and 2 site investigation reports will need to be carried out to identify the extent of contamination and to establish an appropriate remediation strategy.</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Reflecting the above Policy JP Allocation 12 requires development of the site to incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes. No changes are considered necessary.	
	<b>Flooding</b>		
JPA12.47	<p>The site is located in a floodplain. Development will cause greater flood risk.</p> <p>Area is regularly waterlogged after even moderate rainfall.</p> <p>Concerned about drainage problems on this site given the steep hillside and believe that houses on Oldham Rd could be flooded.</p> <p>Site include a small but nevertheless important river within boundary (River Beal) which help to prevent flooding and are attractive features of the site.</p>	<p>Section B, part 11 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) and the 2020 Level 2 SFRA.</p> <p>In terms of fluvial flood risk 80.87% of the site allocation is within Flood Zone 1, 14.71% is within Flood Zone 2, 1.02% is within Flood Zone 3a, and 3.40% is within Flood Zone 3b. Risk of flooding from surface water was found to be low for 16.19% of the site, medium risk for 6.66%, and high risk for 3.69%. In response the Level 1 SFRA recommends that the site should consider the site layout and design around the identified flood risk as part of a detailed flood risk assessment (FRA) or drainage strategy. The assessment also gave a high-level indication of where natural processes, through green infrastructure, could be used for future flood storage functions to support Natural Flood Management, stating that such opportunities, as outlined above, should be explored further as part of masterplanning, site specific flood risk assessments and drainage strategies.</p> <p>These findings have been reflected in Policy JPA12 Beal Valley in criterion 20, which requires any development on the site to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, and criterion 21 with the need to provide for a wetland catchment area. Furthermore, Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment approach to protect the quantity and quality of water bodies and managing flood risk. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.48	River Beal and River Tame already heavily polluted with micro plastics. The Environmental Agency estimates that there are only 14% of rivers in the country that are clean.	Criterion 14 of Policy JPA12 Beal Valley states that development on the site will be required to protect and enhance the habitats and corridor along the River Beal to improve the existing	Pamela Travis

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		water quality and seek to achieve 'good status' as proposed under the EU Water Framework Directive. No changes are considered necessary.	
	<b>Topography</b>		
JPA12.49	Topography of the site presents significant constraints to development.	Paragraph 3.2 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> recognises that the site has significant topographical constraints. This has informed the identification of the developable area, site capacity and the retainment of a large green wedge from development as required through criterion 11 of Policy JP Allocation 12. No changes are considered necessary.	SGMGB Oldham Groups
JPA12.50	There is a disused mineshaft on site.	Chapter 12 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> acknowledges that whilst the majority of the site is uncontaminated, there is an industrial area and landfill site to the north. As such, any development would need to take account of the fact that a large proportion of the site has been subject to landfill.  In response criterion 22 of Policy JPA12 Beal Valley states that development of the site will be required to incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes. No changes are considered necessary.	Neil Shoreman
	<b>Infrastructure</b>		
JPA12.51	Objections regarding the lack of infrastructure - 480 homes are too many for the population, site area and surrounding infrastructure. New schools, medical practices and NHS dentists would need to be built. Schools are already oversubscribed. Proposed development would add further strain. GP's are working at capacity. There is a lack of health centres / existing provision is inadequate. New medical facilities and dentists, social care and accessible food shops are required. Impact on Royal Oldham Hospital. Need facilities like swimming pools, sports and youth facilities. PfE does not appear to adequately allocate further funding to deliver on these requirements. The proposal to 'contribute' to the	Paragraph 11.134 of JPA12 Beal Valley recognises the importance of ensuring that any development proposed does not place undue pressure on existing infrastructure and that account is taken of the increased demand it may place on existing provision. As such therefore a number of criteria included in JPA12 that seek to ensure appropriate infrastructure is provided.  Furthermore, there are also a number of policies in the <a href="#">Publication Plan</a> that seek to address this matter, such as policies JP-G6 Urban Green Space; JP-P5 Education, Skills and Knowledge; and JP-P6 Health; JP-P7 Sport and Recreation. Supporting these are the overarching policies of Policy JP-P1 Sustainable Places, which sets out key attributes that all development, wherever appropriate, should be consistent with including being supported by critical infrastructure, such as energy, water and drainage and green spaces; and Policy JP-D2 on Developer Contributions. The Plan needs to be read as a whole. No changes are considered necessary.	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>provision of school places and 'appropriate' health and community facilities is weak and unconvincing.</p> <p>Strongly reconsider the entire proposal to build on this site unless the infrastructure would be improved with new schools, GP surgeries, NHS dentists etc.</p>		
	<p><b>Impact on community facilities</b></p>		
JPA12.52	<p>Objections regarding impact on existing community facilities:</p> <p>Unsound to put a new road through the car park of a well-established crown green bowling club / well-used fishing lodge. Concerns regarding impact on bowling green and car parking arrangements as route of spine road goes through provision. Unsure what proposals mean for existing provision. Some members have mobility issues and may not be able to access club if parking is removed. Community hub for many.</p> <p>Concerns regarding impact of proposed development on fishing lodge, in particular parking, drainage, and removal of fishing lodge facility at parcel A (of indicative concept plan). The proposal within the plan, misses the opportunity to establish the lodge as a green feature of the housing development and its potential contribution towards green infrastructure / recreational facilities.</p> <p>The development of Heyside Cricket Club is not unwelcomed however further detail is needed.</p>	<p>Chapter 26 of Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> provides details of the indicative high-level concept planning for the site. As stated in paragraph 26.4 it is acknowledged that the indicative concept plan may change with the preparation of more detailed masterplans and in conjunction with a future developer's planning application. As such, Policy JPA12 Beal Valley requires that development on the site will need to be in accordance with a comprehensive masterplan and design code for the site agreed by the local planning authority. This is to ensure that development of the site is considered as a whole and takes into the requirements set out in Policy JPA12. This includes criterion 15 which states that any development on the site will be required to provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements. Furthermore, Policy JP-P7 Sport and Recreation also seeks to protect and enhance a network of high-quality and accessible sports and recreation facilities.</p> <p>With regards to the spine road specifically, as stated above the high-level concept plan prepared to support the allocation is indicative and as such the route may change depending on further evidence, the transport assessment and as part of the comprehensive masterplan and design required as part of any development and which must be agreed with the local authority. Indeed, the need for further work to ascertain whether the extension of the spine road is deliverable in the northern part of the site is highlighted in the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>. This is reflected in criterion 5 of Policy JPA12 Beal Valley, which states that any development will be required to safeguard a route from the proposed spine road through the northern part of the site, as part of any development, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond.</p>	See Appendix

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		The Plan needs to be read as a whole. No changes are considered necessary.	
	<b>Green Infrastructure</b>		
JPA12.53	<p>Objections regarding loss of green space.</p> <p>Site provides a natural greenspace in walking distance where wildlife lives, enabling children to learn about the natural environment. Encroaches on peoples recreational space and the enjoyment of the semi wild places.</p> <p>The local community benefits from the local greenspace. There is a desire for the Beal Valley to be maintained as it exists, protected, conserved and enhanced by policy.</p> <p>Areas around the site are quite deprived. Land is a valuable asset.</p> <p>Loss of attractive open spaces which provide recreation opportunities, pleasure, relaxation and health benefits for residents and visitors.</p> <p>Allocations have reduced in the Shaw, Crompton and Royton area, however it still sees some valued recreational green spaces diminish.</p>	<p>Policy JPA12 Beal Valley includes a number of criteria in relation to open space and green infrastructure – 8, 12 and 15. In addition, criterion 11 requires any development on the site to ensure the protection from development of a large green wedge, between the main development area and the Metrolink line to the east and its enhancement as part of the multi-functional green infrastructure network, and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.</p> <p>Furthermore, policy JP-G2 Green Infrastructure Network sets out a strategic approach for the protection, management and enhancement of our Green Infrastructure. It states that wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network in accordance with the priorities identified. The Plan also includes policies JP-G6 Urban Green Space, JP-G8 Standards for Greener Places and JP-P7 Sport and Recreation.</p> <p>The allocation, alongside Policy JP Allocation 14 Broadbent Moss, provides an opportunity to demonstrate an exemplar development, using green infrastructure that can be designed in a way to support local biodiversity and strengthen coherent ecological networks beyond the site boundary.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.54	Provides one of the few opportunities for people to undertake horse riding in safety which is particularly valued by young and inexperienced riders.	Criterion 8 of Policy JPA12 Beal Valley seeks to encourage sustainable modes of travel and maximise the sites accessibility, developing on the existing recreation routes and public rights of way network. This should be delivered as part of a multi-functional green infrastructure network (incorporating the retention and enhancement of existing public rights of way) to enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.	Cllr Howard Sykes

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		Furthermore. Policy JP-P7 sets out the ways in which a network of high-quality and accessible sports and recreation facilities will be protected and enhanced. This includes protecting and enhancing the public rights of way by, et al, expanding the network of strategic recreation routes offering longer distance opportunities for walking, cycling and horse-riding. The Plan needs to be read as a whole. No changes are considered necessary.	
JPA12.55	There should be no pre-emptive removal of OPOL designation of OPOL9, OPOL10 and OPOL22. Since both OPOL10 (Shawside) and OPOL22 (Cowlshaw) both meet the criteria for Local Green Space (LGS), then they should be awarded the designation if these allocations are ultimately removed from the GMSF/PFE, given that the decision not to designate them as LGS is contingent on their allocation.	Land designated as Other Protected Open Land (in Oldham Council's <a href="#">Joint Core Strategy and Development Management Development Plan Document</a> ) would remain designated as such until it has been de-designated through Places for Everyone or the Oldham Local Plan (as part of the future review). Until such a time it will continue to be protected in line the Policy 21 of Oldham's Core Strategy. No changes are considered necessary.	Paul Burns
JPA12.56	Complete disregard for loss of community identity, things like Beating of the Bounds which is a walk that is carried out every 7 years around the boundaries of Shaw & Crompton. Represents a historical event involving the community of Shaw. Proposals will eradicate community identity.	<p>Criterion 8 of Policy JPA12 Beal Valley requires development on the site to enhance pedestrian and cycling links as part of a multi-functional green infrastructure network. This should incorporate the retention and enhancement of existing public rights of way.</p> <p>Policy JP-P1 Sustainable Places lists the key attributes that all development should be consistent with. These include respecting and acknowledging the character and identify of the locality and promoting a sense of community. Furthermore, Policy JP-P2 Heritage seeks the positive integration of our heritage through, amongst others, utilising the heritage significance of a site or area in the planning and design process providing opportunities for interpretation and local engagement. The Plan needs to be read as a whole. No changes are considered necessary.</p>	Save Shaw's Green Belt
	<b>Legal / compliance</b>		
JPA12.57	Unsure about total legal compliance.	Comment not relevant to the content of the Policy JPA12 Beal Valley. Matter addressed elsewhere.	See Appendix
JPA12.58	This process is being driven by greed and corrupt politicians. Who are only interested in their own greed and power.	Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a> . Details of the process can be found at paragraphs 1.59 to 1.68 of the <a href="#">Publication Plan</a> and the introductory chapter (pages 4 to 6) of the Beal Valley Allocation Topic Paper [ <a href="#">10.05.32</a> ]. No changes are considered necessary.	Colin Raftery

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JPA12.59	Consultation process is flawed. Systematic disregard for broad community involvement. Not writing to every household is discriminatory as it has excluded anyone without access to the internet. There are 2.7 million adults in the UK (ONS Figures) that do not have access to the internet and this should have been taken into consideration. This is also higher in Oldham, simply because of the demographic of the area, particularly in Shaw which has a high population of elderly residents. Request that write to every household in writing.	Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a> . Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a> . Further details can be found in Oldham Council's SCI Statement of Compliance. No changes are considered necessary.	Save Shaw's Green Belt
JPA12.60	It is important that local residents are engaged throughout and communicated with on recent changes to plans.	Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a> . Further details can be found in Oldham Council's SCI Statement of Compliance. No changes are considered necessary.	Debbie Abrahams MP
	<b>Health and well-being</b>		
JPA12.61	<p>Objections regarding the impact on mental health and well-being.</p> <p>Importance of growing food, connecting to nature and being around wildlife.</p> <p>Loss of communities and increased loneliness.</p> <p>Land is used for exercise and nature watching promoting mental health, obesity, exercise.</p> <p>Mental health is a growing concern for all. Spending time outdoors is a proven aid for this. Open, peaceful areas are known to help with these issues.</p> <p>Family time, exploring and teaching our young about nature how to nurture it and respect it should be very important.</p>	<p>As set out in chapter 23 of the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] the Integrated Assessment [<a href="#">02.01.02</a>, <a href="#">02.01.04</a>, <a href="#">02.01.05</a>] has incorporated a Health Impact Assessment. The Beal Valley scored very positively against supporting healthier lifestyles and supporting improvements in determinants of health, due to the requirements set out in Policy JPA12 Beal Valley for delivering multi-functional green infrastructure, enhanced linkages to the countryside, enhanced biodiversity and new or improved open space provision. Furthermore, Policy JPA12 Beal Valley supports active travel options to be delivered as part of the allocation, including high-quality walking and cycling facilities, linking to new and existing public transport provision, and the retention and enhancement of public rights of way.</p> <p>Furthermore, Policy J-P6 Health states that to help health inequality new development will be required, as far as practicable, to:</p> <ul style="list-style-type: none"> <li>• Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;</li> <li>• Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice; and</li> </ul>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<ul style="list-style-type: none"> <li>Be supported by a Health Impact Assessment for all developments which require an Environmental Impact Assessment, and other proposals where the local planning authority considers it appropriate.</li> </ul> <p>Policy JP-G2 also recognises the role of food growing as a wider public benefit of the green infrastructure network, alongside its primary functions.</p> <p>The Plan needs to be read as a whole. No changes are considered necessary.</p>	
JPA12.62	We should be teaching and showing our children wildlife in their natural environment and not just a picture in a book.	Policy JPA12 Beal Valley includes a number of criteria relating to the retention and enhancement of biodiversity, green infrastructure and open space. No changes are considered necessary.	Terry Millett
	<b>Wildlife / natural environment</b>		
JPA12.63	<p>Site is home to many wildlife and nature species which the government expresses we need to protect and conserve.</p> <p>Proposed development will destroy / have a negative impact on wildlife and habitats. Species mentioned include deer, badgers, foxes, bats, pheasants, a large variety of birds including kestrels, owls, kites etc.</p> <p>Site further enhanced by a diverse range of flora and fauna.</p> <p>Comment that there are over 1000 species, including priority species. Need sufficient land for feeding and green corridors.</p> <p>The SBI is a significant constraint and should preclude the site coming forward as an allocation - mitigation in the form of habitat compensation is not an acceptable solution. Concerns raised about the impacts on the ground-nesting breeding wading bird populations within the SBI.</p>	<p>Chapter 18 of the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] considers ecology and biodiversity. The conclusions from the Preliminary Ecological Appraisal [<a href="#">10.05.12</a> pages 20 to 21] , carried out by GMEU in 2020, are summarised at paragraph 18.5 to 18.7 of the Topic Paper. The appraisal found that SBI may be a significant constraint, although the size of the overall allocation could mean that there is space for habitat compensation. The SBI, the river course and, broadleaved woodland would all need to be taken into account. Extended Phase 1 habitat survey, badger, amphibian, water vole and bat surveys will be required at planning application stage. The findings of the appraisal have informed Policy JPA12 and in particular criteria 12, 13 and 14.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.64	<p>Comments regarding protection and enhancement of wildlife / biodiversity, including the need to protect trees and plants, and retain the SBI.</p> <p>Develop the green space for use of the community, nature reserve, outdoor sports and activities, woodland to contribute the</p>	Criterion 11 of Policy JPA12 Beal Valley requires development on the site to ensure the protection from development of a large green wedge, between the main development area and the Metrolink line to the east and its enhancement as part of the multi-functional green infrastructure network, and contribute towards green infrastructure enhancement opportunities	See Appendix

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	<p>carbon footprint. Nature needs to be brought back into our urban areas as part of our efforts to tackle global warming and diversify our wildlife.</p> <p>This is a vast amount of land which is home to many wildlife and nature species which is growing rapidly. That which the government expresses we need to protect and conserve.</p>	<p>in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.</p> <p>Furthermore, policy requirements regarding biodiversity, Habitat Regulation Assessment, further surveys and habitats along with River Beal are set out in criteria 12, 13 and 14 of JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.65	<p>Considered that there is insufficient evidence to be able to accurately assess the direct impact of any development on protected species.</p>	<p>It is considered that a proportionate evidence base has been prepared to support the policy, including the preparation of a Preliminary Ecological Appraisal <a href="#">[10.05.12]</a> and Habitat Regulation Assessment (HRA) <a href="#">[02.02.01]</a> A summary of the findings of both can be found at chapter 18 and 19 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a>.</p> <p>Criterion 12, 13, and 14 of JPA12 Beal Valley set out how any development on the site will be required to retain and enhance biodiversity, have regard to the recommendations of the Habitat Regulations Assessment and provide further surveys, and protect and enhance the habitats and corridor along the River Beal.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	SGMGB Oldham Groups
JPA12.66	<p>Site is beautiful and peaceful.</p>	<p>Comment noted.</p>	Janet Millett
JPA12.67	<p>Requirements for GI and a joint approach to ecological enhancement needed with Broadbent Moss.</p>	<p>Paragraphs 11.137 and 11.138 of JPA12 Beal Valley highlight the inter-relationship and connectivity between the allocations at Broadbent Moss and Beal Valley, stating that together they provide the opportunity to secure net gains for nature and local communities. The development of the two site allocations should include elements of partnership work with appropriate bodies, to ensure they contribute towards a wider ecological network approach and provide an opportunity to demonstrate an exemplar development using green infrastructure, that can be designed in such a way that it can support local biodiversity and strengthen coherent ecological networks beyond the site boundary, creating a resilient landscape through a network of connected sites. No changes are considered necessary.</p>	SGMGB Oldham Groups
JPA12.68	<p>Destruction of green spaces is contrary for an original plan 25 years ago to develop the space for the use of the community.</p>	<p>Not relevant to Places for Everyone. The Plan is based on robust and proportionate evidence. No changes are considered necessary.</p>	Andrew Mossop

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JPA12.69	Loss of agriculture.		Andrew Burtonwood
JPA12.70	What will happen to the collections of trees on the bend of Bullcote Lane adjacent to the spine road?	<p>Criterion 1 of Policy JPA12 Beal Valley requires development on the site to be in accordance with a comprehensive masterplan and design code as agreed by the local planning authority. This is to ensure that development of the site is considered as a whole and takes into the requirements set out in Policy JPA12. In terms of these requirements, criterion 8 of Policy JPA12 Beal valley sets out those for delivering a multi-functional green infrastructure network. Whilst criteria 11, 12 and 13 set out how development on the site is required to:</p> <p>Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment <a href="#">[07.01.12]</a>;</p> <p>Retain and enhance the hierarchy of biodiversity within the site; and</p> <p>Have regard to broadleaved woodland when carrying out further surveys required.</p> <p>Furthermore, Policy JP-G 7 Trees and Woodland also seeks to significantly increase tree cover, protect and enhance woodland, and connect people to the trees and woodland around them. In addition, Oldham Council has a <a href="#">saved UDP policy</a> on the Protection of Trees on Development Sites (D1.5) that remains part of the current Local Plan. The Plan needs to be read as a whole. No changes are considered necessary.</p>	Neil Shoreman
JPA12.71	<p>The Wildlife Trust for Lancashire, Manchester &amp; North Merseyside recommends that the allocation be considered unsound for a number of reasons:</p> <p>Welcome the proposals to retain and enhance the hierarchy of biodiversity within the site. However, recommend that a buffer zone between the SBI and the development will be required to fully protect and enhance the SBI. The hydrological effects of development adjacent to a wetland needs to be investigated and mitigated for. In addition, ground-nesting breeding wading bird populations within the SBI will be dependent on sufficient areas of open land. Retaining just the SBI would be insufficient to retain and protect these species populations. Green</p>	<p>The policy has been informed by the Preliminary Ecology Appraisal <a href="#">[10.05.12]</a> and Habitat Regulation Assessment <a href="#">[02.02.01]</a> with the inclusion of criteria (12 and 13) seeking:</p> <p>The retention and enhancement of the hierarchy of biodiversity within the site, notably the existing Shawside SBI; and</p> <p>The requirement for further surveys on phase 1 habitats, badgers, amphibians (including great crested newts) and bat surveys to inform any planning application.</p> <p>Criteria 1 of Policy JPA12 Beal Valley also requires development on the site to be in accordance with a comprehensive masterplan and design code as agreed by the local planning authority. This is to ensure that development of the site is considered as a whole and takes into the requirements set out in Policy JPA12, including that the requirements of criteria 12 and 13 have been met.</p>	Wildlife Trust

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	<p>Infrastructure retention and enhancement must be designed around the requirements of these important species populations and mitigation plans must provide adequate land to support the bird populations; and</p> <p>Welcome commitment for the provision of further surveys. These should also include breeding bird surveys (especially farmland bird surveys) and suitable mitigation / compensation should be provided.</p> <p>Welcome commitment set out in criteria 14 and statement at 11.138 regarding the allocations at Beal Valley and Broadbent Moss providing an opportunity to demonstrate exemplar development, using Green Infrastructure in a way to support biodiversity.</p>	<p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12. No changes are considered necessary.</p>	
	<p><b>Utility infrastructure / drainage</b></p>		
JPA12.72	<p>Currently a lack of utility infrastructure provision across the site. Preliminary investigations are needed to assess whether there is capacity in the surrounding network to accommodate the scale of development suggested in the allocation.</p> <p>The metrolink line is a potential physical and logistical barrier to running services from the east.</p>	<p>PfE and Policy JPA12 Beal Valley sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided. Policy JP-D1 Infrastructure Implementation also seeks to ensure that development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility infrastructure capacity, from first occupation until development completion.</p> <p>Furthermore, with regards to Beal Valley specifically Policy JP Allocation 12 requires development of the site to be informed by a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. No changes are considered necessary.</p>	SGMGB Oldham Groups
JPA12.73	<p>Concerns raised regarding drainage and sewerage issues and that these have not been addressed.</p> <p>Marshy nature suggests the need for a detailed drainage strategy on a large scale. The implications of any long-term effects of the drainage required need to be considered with regards to sensitive environmental areas.</p> <p>Sewerage infrastructure likely to be insufficient to increase in homes.</p>	<p>A Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> has been carried out to inform the PfE and the proposed strategic allocations, including Beal Valley. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording. This has informed criterion 19 of Policy JPA12 Beak Valley, requiring an appropriate flood risk assessment, comprehensive drainage strategy and the integration of natural sustainable drainage systems as part of the multi-functional green infrastructure network.</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 JPA12 Beal Valley. No changes are considered necessary.	
JPA12.74	Groundwater source protection zone - extent of any development needs to account for this.	Criterion 21 of Policy JP Allocation 12 requires any development on this site to have regard to the Groundwater Source Protection Zone in the design of the development to ensure there are no adverse impacts to groundwater resources or groundwater quality and to ensure compliance with the Environment Agency's approach to groundwater protection and any relevant position statements. No changes are considered necessary	SGMGB Oldham Groups
JPA12.75	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
JPA12.76	No municipal tip in Shaw and Crompton area.	Paragraphs 5.53 to 5.56 of the <a href="#">Publication Plan</a> consider Waste. As stated at paragraph 5.56 the Greater Manchester Joint Waste Development Plan was adopted in April 2012, which includes a set of policies which assist in the consideration of waste planning applications and identifies suitable locations for potential new waste management facilities. Policy 7 Sustainable Use of Resources – Waste Management of Oldham's <a href="#">Joint Core Strategy and Development Management Development Plan Document</a> supports this at a local level. No changes are considered necessary.	Cllr Howard Sykes
JPA12.77	Lack of investment by water utility companies. New housing development has resulted in untreated sewage being discharged into rivers on a regular basis illegally.	Comment not relevant to the content of Policy JPA12 Beal Valley.	Simon Travis
JPA12.78	Wording amendments are suggested to the criteria on flood risk assessment (JPA14 (19)) including surface water management and using natural flood management and highways SUDs.	The findings from the Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> have informed the policy requirements set out in JPA12 Beal Valley. Criterion 19 of policy JPA12 sets out that development of the site is required to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. It also goes on to say that natural sustainable drainage systems should be integrated as part of the multi-functional green infrastructure network and highway SUD's features explored. Further guidance is then also provided in paragraph 11.168 of the <a href="#">Publication Plan</a> .	United Utilities Group PLC

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		Furthermore, Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment approach to protect the quantity and quality of water bodies and managing flood risk, which developments would need to have regard to where relevant. No changes are considered necessary.	
JPA12.79	Suggested an additional criterion around meeting National Housing Standard for water consumption.	Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies and managing flood risk, which includes a criterion on conserving water and maximising water efficiency in new development. The Plan needs to be read as a whole. No changes are considered necessary.	United Utilities Group PLC
JPA12.80	Additional criterion requested regarding taking into account the Groundwater Source Protection Zone in the design of the development and compliance with the Environment Agency's approach to groundwater protection. Appropriate risk assessments of the impact on the groundwater environment and public water supply should be required.	Criterion 21 of policy JPA12 sets out that development of the site is required to have regard to the Groundwater Source Protection Zone in the design of the development, to ensure that there are no adverse impacts to groundwater resources or groundwater quality, and to ensure compliance with the Environment Agency approach to groundwater protection and any relevant position statements. A detailed hydrological assessment should support any planning application within this zone. No policy changes are considered necessary.	United Utilities Group PLC
	<b>Heritage</b>		
JPA12.81	Concern that development will be out of character with heritage assets and their settings.	<p>Chapter 20 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> summarises evidence in relation to the historic environment.</p> <p>The Historic Environment Assessment Screening Report 2019 <a href="#">[08.01.01]</a> recommended that Beal Valley is screened in for further assessment, concluding that whilst there are no designated sites within the land allocation, a number have been identified nearby which require further assessment.</p> <p>To address the recommendations a Historic Environment Assessment (HEA) <a href="#">[10.05.03]</a> was carried out of the site. The assessment identified that there are four designated heritage assets close to the site. The assessments concluded that the site allocation could harm the setting of two of the heritage assets – Birshaw House (Grade II listed) and New Bank (Grade II listed) – and needs to be mitigated to reduce harm to an acceptable manner. Paragraphs 20.4 to 20.8 of the Topic Paper provide further information.</p>	SGMGB Oldham Groups

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		<p>The HEA has informed Policy JPA12 Beal Valley and criterion 18 requires development on the site to be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. Further detail regarding the historic environment is provided at paragraph 11.141 of Policy 11.141.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.82	Potential for archaeological remains needs to be given more consideration.	<p>The initial Historic Environment Assessment Screening Report 2019 <a href="#">[08.01.01]</a> concluded that there is potential for pre-historic activity, for Medieval/ Post-Medieval agricultural activity, and Industrial periods. Further archaeological work is therefore recommended. Reflecting this, criterion 18 of Policy JPA12 Beal Valley states that an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.</p> <p>Furthermore, Policy JP-P2 Heritage states that development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets. No changes are considered necessary.</p>	SGMGB Oldham Groups
	<b>Landscape / visual impact</b>		
JPA12.83	Recognise that houses must be built in Oldham to meet our housing need, however my support for this proposal is conditional on the basis that the valley is kept as clear as possible so that the view from Bullcoat Park is not materially impacted by the development – this would of course have an impact on the number homes that could be built on the site, but it is important in my view to ensure that we protect our natural assets where possible.	<p>Criteria 9 and 10 of JPA12 Beal Valley require development on the site to:</p> <p>Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. A Landscape Appraisal is required to inform any planning application;</p> <p>Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.</p> <p>Chapter 17 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> summarises the evidence from the Landscape Character Assessment (2018) <a href="#">[07.01.06]</a> in relation to the allocation and the recommended mitigation measures. It is considered that an appropriate and proportionate</p>	Jim McMahon MP

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	
	<b>Viability</b>		
JPA12.84	<p>Comments made regarding the viability and deliverability of the site.</p> <p>Viability assessment indicates that development would not be viable. Requirements for affordable housing, strategic transport and infrastructure costs, and likely abnormalities / constraints such as contamination, ecology, topography and drainage significantly influence deliverability of any development. There are known access issues and the site is technically challenging.</p>	<p>A strategic viability assessment [<a href="#">03.03.01</a>, <a href="#">03.03.02</a>, <a href="#">03.03.03</a> and <a href="#">03.03.04</a>] has been published alongside the <a href="#">Publication Plan</a>. The assessment provides detail of the methodology and assumptions used as well as the findings and any sensitivity testing undertaken. Details are summarised in the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] at chapter 24. In relation to the site, the viability assessment found the allocation to be marginally viable against the sensitivity test, which assumed an increase in market values by 15%. However, it is considered that the allocation offers the opportunity to provide a significant number of new homes that will help to diversify Oldham's housing stock and contribute to meeting housing needs. Along with the neighbouring Broadbent Moss allocation and the new Metrolink stop with associated park and ride, the council consider that the Beal Valley site has the potential to create a new housing market at a significant scale and in a sustainable and accessible location. Therefore, it is considered reasonable to assume that a development in this location would be popular, with accelerated sales rates and values.</p> <p>In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This position is reflected in Policy JP-D2 Developer Contributions.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	See Appendix
JPA12.85	<p>Net developable area will be impacted on by need for ecological and flood risk mitigation - this should have been considered in advance of setting an indication of predicted residential unit yield.</p>	<p>Section A, Part 3, of the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] provides a summary of the allocation site. Paragraph 3.2 sets out the gross site area measures approximately 51 hectares and the developable area measures approximately 21 hectares. The site capacity is based on the developable area and this has been informed by the parcels identified on the high-level indicative concept plan [<a href="#">10.05.01</a>] and in the accompanying report [<a href="#">10.05.02</a>]. Constraints, such as ecology, flood risk and topography were used to help inform the development parcels. Constraints and the indicative development parcels have also informed</p>	SGMGB Oldham Groups

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		<p>the requirement for protection of a large green wedge between the main developable area and Metrolink line to the east and the provision of a wetland catchment area in the south east of the site within the Flood Zone 3 area.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.86	Imperative that the Mayor of Greater Manchester and the ten local authority leaders join with local MPs, housing developers and social landlords to lobby government to significant increase funding to address remediation. Need if brownfield sites are to make the 'maximum contribution'.	The Delivering the Plan chapter of the <a href="#">Publication Plan</a> sets out our approach to implementation and delivery, recognising that the level of growth proposed (across the plan as a whole) will require substantial amounts of investment from both the public and the private sector. It will be important that the Plan is supported by sources of funding and delivery mechanisms. However, many of the necessary actions lie outside its scope and will be taken forward through other strategies, plans and programmes. No changes are considered necessary.	Cllr Howard Sykes
JPA12.87	There are concerns with the deliverability of this site and would recommend the allocation of additional sites to act as a buffer should this site not come forward within the plan period or there are significant delays in bringing the site forward. We consider a 30% reduction (549 dwelling) should be built into the supply assessment from these sites (including Beal Valley).	It is considered that an appropriate evidence base has been prepared to support the allocation. Evidence in relation to the site selection process is set out within the the Site Selection Background Paper <a href="#">[03.04.01]</a> . It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	PD Northern Trust Asset Management
	<b>Site selection</b>		
JPA12.88	Look at all the much better located greenfield sites that were put forward in the call for sites process, sites that do not have issues regarding access, congestion, pollution, sewerage, drainage and poor motorway / rail connections. Specific mention of Saddleworth.	Alternative options to meet development needs are set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> . The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	John Shepherd
	<b>General objections</b>		
JPA12.89	Proposal is unsustainable	Policy JP-S1 Sustainable Development sets out specific policies to achieve sustainable development, including measures in relation to supporting infrastructure and biodiversity [see pages 82-83 of the Publication Plan for the full policy].	Vicky Harper

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		<p>The site is in a sustainable and accessible location, on the edge of a large area of open land. It is located near to existing neighbouring residential communities and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this and the Beal Valley site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond. See allocation Policy JPA12 Beal Valley, <a href="#">[Publication Plan]</a>, paragraph 11.132].</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.88	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 JPA12 Beal Valley.	See Appendix
JPA12.89	Damaging the environment in order to obtain Council Tax revenue to make up for government cuts/shortfalls to local Authorities.	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> 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.</p> <p>Evidence has been produced in relation to the housing and employment land demand over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the plan to be based on the housing and employment land need figures, derived from the evidence base. See supporting evidence Housing Topic Paper <a href="#">[06.01.03]</a>; Greater Manchester Strategic Housing Market Assessment <a href="#">[06.01.02]</a>; Economic Forecasts for Greater Manchester <a href="#">[05.01.01]</a>; Employment Land Needs in Greater Manchester <a href="#">[05.01.02]</a> and Employment Topic Paper <a href="#">[05.01.04]</a>. The Housing Topic Paper <a href="#">[06.01.03]</a> 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>	Pamela Travis

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		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	
JPA12.90	If you put as much effort into cleaning unlicensed scrapyards, transformed arable allotments into site burning/burying-illegal plastic waste, rubber tyres, scrap cars & vans crushed, constant noise of Mechanical Machinery- then you might be getting somewhere.	Comment not relevant to the content of Policy JPA12 Beal Valley.	Pamela Travis
JPA12.91	Several matters in the document are of significance to a small percentage of people affected by the plan. Look like fillers in the document (i.e. benefits to hikers / ramblers and protection of certain species).	It is important that the plan is read as whole. Developments will be required to meet the requirements of thematic policies where relevant as well as those set out in the allocation policies (including JPA12 Beal Valley).  It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	Neil Shoreman
JPA12.92	Clarity is sought in the supporting text regarding who is to prepare the “comprehensive masterplan and design code to be agreed by the Local Authority”.	Policy JPA12 Beal Valley states that development on the site will be required to be in accordance with a comprehensive masterplan and design code as agreed by the local planning authority. As the masterplan and design code would be needed to support development coming forward on the site and to demonstrate how policy requirements of JPA12 Beal Valley were being met this would need to be done by the applicant. The specific reference to a ‘comprehensive’ masterplan this acknowledges that the masterplan would need to be for the site as a whole and would require landowners to work together to bring the site forward. No changes are considered necessary.	Peter and Diane Martin
JPA12.93	A significant number of the proposed site allocations are unjustified and not well located – they are unsustainable and should not be promoted. Issues and constraints listed including impact on the highway, flood risk, access to services, facilities and public transport, impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. The proposed allocations should be reassessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed removed. Request that the	The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary <a href="#">[07.01.25]</a> . The Site Selection Background Paper <a href="#">[03.04.01]</a> provides information on the methodology for selecting the strategic allocations/ growth areas. Detail on the site’s selection is contained within the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> , chapter 5]. Policy JPA12 seeks to mitigate the impact on various factors – such as the impact of associated traffic on the local highway; delivery of meaningful and measurable net gain in biodiversity; the contribution towards green infrastructure enhancement opportunities in the surrounding Green Belt; ensuring that any development proposed does not place undue pressure on existing social	Save Shaw’s Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Plan ensure the delivery of the right homes in the right places and deletion of inappropriate and undeliverable sites from the Plan	<p>infrastructure; and requiring an appropriate flood risk assessment and a comprehensive drainage strategy.</p> <p>With the above and when the plan is read as whole, it is considered that this is sufficiently robust and proportionate evidence to support the Plan. No changes are considered necessary.</p>	
JPA12.94	Insufficient consideration has been paid within the Plan to the long-term impacts of Covid, both on the economy and on human behaviours. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, it's High Streets and general housing and employment land requirements.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a> . It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.	Save Shaw's Green Belt
JPA12.95	Request that this allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town centres and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework.	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. 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.</p> <p>The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>Section 14 of the Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a>, sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release. Further</p>	Save Shaw's Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">07.01.25</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.96	<p>Degree to which the Broadbent Moss and Beal Valley allocation are linked is questioned. If the allocations are fundamentally intertwined they should be one allocation. Two separate but symbiotic allocations pose a significant deliver risk to the plan. The link between the two allocations needs to be further justified and unless each allocation is acceptable on its own merits, they should not form part of the PFE plan.</p>	<p>Policy JPA 12 Beal Valley and Policy JPA 14 Broadbent Moss are separate allocations. However, given the scale of development proposed and the proximity of the two allocations it is considered that there are elements that are linked. In particular, these include the proposed spine road and highway arrangements around Cop Road / Bullcote Lane, delivery of the new Metrolink stop and new park and ride facility, creation of a multi-functional green infrastructure network and provision for a wetland catchment area. No changes are considered necessary.</p>	Peter and Diane Martin
	Pollution		
JPA12.97	<p>Concerns regarding air pollution. Plan considered unsound as it fails to "mitigate noise and air quality".</p>	<p>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. See Beal Valley Allocation Topic Paper <a href="#">[10.05.32]</a> chapter 21 for further detail in regards to air quality and pollution.</p> <p>When read as a whole the plan is considered sufficient to deal with issues arising from air pollution. No changes are considered necessary.</p>	See Appendix
	<b>Evidence</b>		
JPA12.98	<p>Drafting error noted on page 70 of the Concept Report, which states that Site A (our client's site) already holds planning consent for c80 dwellings. This is not correct. It is in fact site B (currently under construction by Great Places on Moss Hey Street) that was originally granted outline planning consent for 80 dwellings (which has since been reduced to 65).</p>	<p>Error on page 70 of the Broadbent Moss and Beal Valley Concept Planning Indicative Concept Plan Report <a href="#">[10.05.02]</a> noted. Paragraph 11.129 of Policy JPA12 Beal Valley acknowledges that there are two brownfield sites in the northern part of the allocation [site A and B on the high-level indicative concept plan]. These are included within the red line to ensure they form part of the comprehensive development of the site. However, they are not included in the residential capacity set out in the policy, as they are already identified as part of the potential housing land supply, as set out in Oldham's current Strategic Housing Land Availability Assessment (SHLAA). Details can be found on <a href="#">MappingGM</a> and in the council's Brownfield Register and SHLAA. No changes are considered necessary.</p>	Trendairo (Duke Mill)
JPA12.99	<p>Comments regarding Oldham Council's draft emerging Mill Strategy and conclusions drawn regarding Duke Mill.</p>	<p>Comment regarding content of Oldham Council's draft emerging Mill Strategy not relevant to the content of Policy JPA12 Beal Valley.</p>	Trendairo (Duke Mill)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Support objective to optimise the site's highly sustainable location. However, whilst work on a viability assessment is ongoing, re-use of the mill may not be achievable given constraints.</p>	<p>Duke Mill (site A on the high-level indicative concept plan) is identified as part of the potential housing land supply, as set out in Oldham's current Strategic Housing Land Availability Assessment (SHLAA). Details can be found on <a href="#">MappingGM</a> and in the council's Brownfield Register and SHLAA.</p> <p>Densities on the site, including the northern part within Duke Mill sits, have been informed by Policy JP-H4 Density of New Housing which sets out minimum density requirement according to location and relative accessibility.</p> <p>A strategic viability assessment [<a href="#">03.03.01</a>, <a href="#">03.03.02</a>, <a href="#">03.03.03</a> and <a href="#">03.03.04</a>] has been published alongside the <a href="#">Publication Plan</a>. Details are summarised in the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] at chapter 24. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This position is reflected in Policy JP-D2 Developer Contributions.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.100	<p>Limited technical information has been submitted alongside the allocation to address concerns relating to topography and heritage.</p>	<p>Evidence prepared to inform Policy JPA 12 Beal Valley has been summarised in the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>]. Evidence base includes the preparation of a high-level indicative concept plan for the site [<a href="#">10.05.01</a> and <a href="#">10.05.02</a>]. The high-level indicative concept plan has helped to identify development parcels, informed by an understanding of the sites topographical and heritage constraints, and site capacity. As summarised in chapter 20 of the Beal Valley Allocation Topic Paper [<a href="#">10.05.32</a>] a Historic Environment Assessment [<a href="#">10.05.03</a>] has also been undertaken which has also informed Policy JPA12 Beal Valley. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	PD Northern Trust Asset Management
JPA12.101	<p>Evidence Base is inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be</p>	<p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley.</p>	Save Shaw's Green Belt

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	revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.		
	<b>Support</b>		
JPA12.102	No comments provided. Sound boxes ticked.	Noted.	See Appendix
JPA12.103	Support the wording of this allocation	Support welcomed.	Historic England
JPA12.104	The delivery of 480 predominantly family homes as part of this allocation is supported along with the opportunity to deliver over 140 affordable family homes aligned to the 30% affordability target.	Support welcomed.	Greater Manchester Housing Providers
JPA12.105	General support from the landowners / developer promotes to the allocation and Policy JPA12. Confirm that site is available, achievable and deliverable. Consider that the Beal Valley allocation is essential to ensure a 'sound' strategy for the future growth of Oldham. Together with Broadbent Moss the allocations present the opportunity for sizeable high-quality neighbourhoods with opportunities for residents to connect with open countryside and contribute to a prosperous local economy. Commitment to work with the Council and other landowners to achieve a comprehensive development of the site with general support for policy requirements. Some modifications requested.	Support welcomed.	See Appendix
JPA12.106	Landowner comments: Broader allocation of Policy JPA12 is supported. However, concerns are expressed about the viability of the southern part of the allocation that falls within the Green Belt. These concerns are centred on the abnormal development costs emanating from the local topography, the need for access and highways infrastructure to open up the site and the impact of heritage assets on the capacity of the allocation. Delivery of the non-Green Belt sites to the north, should not be compromised or make up any short fall in viability, from being brought forward	A strategic viability assessment [ <a href="#">03.03.01</a> , <a href="#">03.03.02</a> , <a href="#">03.03.03</a> and <a href="#">03.03.04</a> ] has been published alongside the <a href="#">Publication Plan</a> . The assessment provides detail of the methodology and assumptions used as well as the findings and any sensitivity testing undertaken. Details are summarised in the Beal Valley Allocation Topic Paper [ <a href="#">10.05.32</a> ] at chapter 24. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This position is reflected in Policy JP-D2 Developer Contributions.	Peter and Diane Martin

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>before either the adoption of the PfE plan or before the rest of the allocation.</p>	<p>Furthermore, Policy JPA 12 Beal Valley requires any development on the site to be in accordance with a comprehensive masterplan and design code as agreed by the local planning authority. This is to ensure that development of the site is considered as a whole and takes into the requirements set out in Policy JPA12.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.107	<p>As shown in row JPA12.105 there is general support from the landowners / developer promoters to the allocation and Policy JPA14. However, following changes to policy wording are sought:</p> <p>Change criterion 2 to ensure that flexibility is allowed for within the masterplanning process should in excess of 480 homes be acceptable taking all physical constraints, opportunities and mitigation measures into account.</p> <p>Change criterion 3 to refer to the agreed tenure split taking into account the findings of the most up-to-date Strategic Housing Market Assessment, the requirements of Registered Providers and viability considerations.</p> <p>Change criterion 5 to reflect that further technical studies are necessary to determine whether this route is necessary and/or whether it can be delivered taking all physical characteristics of the site and feasibility/viability considerations into account.</p> <p>Change criterion 6 to reflect that these requirements will ultimately form part of the Section 106 agreement or planning conditions attached to any future planning permission and so to be considered consistent with national planning, any requirements should be 'reasonable' in scale, according with paragraph 56 of the NPPF.</p> <p>Change criterion 7 to ensure that there is clarity in respect of the appropriate contribution that is to be apportioned across the</p>	<p>It is considered that 'around 480 homes' provides sufficient flexibility within policy criterion 2.</p> <p>Policy JP-H3 Type, Size and Design of New Housing states that 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.</p> <p>Furthermore, in support of criterion 3 paragraph 11.131 states that affordable housing will be delivered in line with local planning policy, informed by Oldham Council's Housing Strategy and Local Housing Needs Assessment.</p> <p>Criterion 5 states that development on the site will be required to safeguard a route from the proposed spine road through the northern part of the site, as part of any development, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond. The words 'safeguard' and 'potential' acknowledge that further technical studies are necessary to determine whether or not the spine road can be delivered as part of the comprehensive development of the site.</p> <p>Criterion 3 states that development on the site will be required to take account of and deliver any other highway improvements, that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area. As set out in Policy JP-C7 Transport Requirements of New Development planning applications are required to be accompanied by a Transport Assessment / Transport Statement and Travel</p>	Redrow Homes (Lancashire)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Allocation in line with an evidenced requirement, taking all viability considerations into account.</p> <p>Change criterion 8 to acknowledge that the allocation will be delivered on a phased basis.</p> <p>Change criterion 11 to refer to contributions towards green infrastructure enhancement opportunities being reasonable and evidenced.</p> <p>Change criterion 12 as the term 'meaningful and measurable' is too vague and more clarity should be provided in respect of the policy requirements.</p> <p>Change criterion 13 requested to reflect that further species surveys will be provided in accordance with the recommendations of an up to date Phase 1 Habitat Survey. Reference is made to a Phase 1 Habitat Survey (2019), prepared on behalf of the landowner / developer promoter.</p> <p>Change criterion 16 to refer to the contribution to additional school places being based on evidence additional demand.</p> <p>Change criterion 17 to reflect that any planning contributions need to be proportionate and based upon the most up to date evidence.</p> <p>Change criterion 19 to reflect that not all areas of the Allocation are physically connected, either as a result of site topography or other physical barriers. Each phase of development will therefore need to ensure that an appropriate drainage strategy is implemented.</p>	<p>Plan where appropriate. It is important to read the plan as a whole. Policy JP-C7 and JPA12 provide an appropriate policy framework.</p> <p>Criterion 7 states that development on the site will be required to contribute to the delivery of the New Metrolink stop and Park and Ride facility. Paragraph of the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. Paragraph 15.1.2 of the Locality Assessment states that potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer. It is not considered appropriate to set out this detail in Policy JPA12.</p> <p>With regards to change requested to criteria 8, 11 and 19 it is considered that the comprehensive masterplan and design code required under criterion 1 would address these issues.</p> <p>With regards to criterion 12 Policy JP-G9 A Net Enhancement of Biodiversity and Geodiversity sets out development will be expected to following mitigation hierarchy with regards to biodiversity and achieve a net gain, amongst other requirements. It is important to read the plan as a whole. Policy JP-G9 and JPA12 provide an appropriate policy framework.</p> <p>Criterion 13 has been informed by the Preliminary Ecological Appraisal [10.05.12]. The conclusions are summarised at paragraphs 18.5 to 18.7 of the Beal Valley Allocation Topic Paper [10.05.32].</p> <p>Criteria 16 and 17 states that development on the site will be required to contribute to additional school places / health and community facilities to meet the increased demand that will be placed on existing provision. Furthermore, Policy JP-P5 Education, Skills and Knowledge states that where appropriate, requiring housing developments to make a financial</p>	

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate. Whereas, Policy JP-P6 requires, where appropriate, to provision of new or improved health facilities as part of new developments that would significantly increase demand. It is considered that the application of these criteria based on evidence of need and demand is implicit within the policy wording. It is important to read the plan as a whole. Policy JP-G9 and JPA12 provide an appropriate policy framework.</p> <p>The Plan needs to be read as a whole and it is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA12 Beal Valley. No changes are considered necessary.</p>	
JPA12.108	<p>As shown in row JPA12.105 there is general support from the landowners / developer promoters to the allocation and Policy JPA14. However, following changes to policy wording are sought:</p> <p>Support delivery of a new Metrolink stop to serve JPA12 and JPA14 including Park &amp; Ride facilities however policy wording should be adjusted to reflect that delivery will be by TfGM and is dependent upon a successful business case being accepted.</p> <p>Policy wording should make it clear that it seeks to 'safeguard' the land to allow for the scenario that TfGM may choose to not bring forward a new Metrolink stop.</p>	<p>With regards to the policy change relating to the Metrolink stop:</p> <p>Criterion 7 of Policy JBA14 requires development to Contribute to the delivery of the new Metrolink stop and new park and ride facility as part of the neighbouring Broadbent Moss allocation, which in part will help to serve and improve the accessibility and connectivity of both allocations. This reflects the findings and recommendations of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>. This highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. The Locality Assessment states that potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer. The proposed Metrolink stop and Park and Ride is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2). No changes are considered necessary.</p>	<p>Countryside Properties LLP, Casey Group Ltd and Wain Homes (CCW&amp;G)</p>

## PfE 2021 Policy JP Allocation 13 – Bottom Field Farm (Woodhouses)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Principle of Development / Use of Green Belt</b>		
JPA13.1	Comment supporting development of the site as it is justified given that all reasonable alternatives have been considered for meeting the housing needs of the area and Borough and it is positively prepared and in line with NPPF and will enable sustainable development in an accessible location.	Support welcomed.	Elan Homes
JPA13.2	<p>Many disagree with any Green Belt release and loss of green space, it should be brownfield first. Even though it will cost more and be harder it would improve the area, for example developing the unused mills.</p> <p>Sets a precedent for developers to justify building on Green belt when they think justified. This development is just a steppingstone to then link, through the green belt, further development.</p>	<p>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.</p> <p>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. Paragraph 8.54 of the PfE Plan sets out that our Green Belt was originally designated in full in 1984 as part of the Greater Manchester Green Belt. It has since seen a series of minor amendments through individual district plans.</p> <p>The scale of development that needs to be accommodated within the Plan area up to 2037 means that some changes to the Green Belt boundaries are necessary in line with the paragraphs 140 and 141 of NPPF. The Growth and Spatial Options Topic Paper (<a href="#">02.01.10</a>) sets out the approach to accommodating growth within the plan area.</p> <p>The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic</p>	See Appendix.

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		<p>Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p> <p>In addition, Bottom Field Farm site allocation includes brownfield land.</p> <p>Development in the redefined Green Belt will be assessed in line with national planning policy and Local Plans, with proposals considered on a case-by-case basis. Therefore, the plan does not set a precedent or steppingstone.</p> <p>No changes considered necessary as 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.</p>	
JPA13.3	<p>Not in line with preventing urban sprawl.</p> <p>Development will create a poor and indefensible Green Belt boundary to the south of the village.</p>	<p>The Stage 2 Assessment of Proposed 2019 GMSF Allocations Appendix B Detailed Allocation Stage 2 Harm Assessment (2020) <a href="#">(07.01.09)</a> states (page 287) that the site makes a relatively limited contribution to Purpose 1 - Check the unrestricted sprawl of large built-up areas and Purpose 2 - Prevent neighbouring towns merging into one another. Releasing this land would extend the urban edge of Woodhouses towards the south but would not diminish its separation from the large built-up area, given the relatively large distance southwards to the edge of the large built-up area at Droylsden. The sub-area contains limited urbanising development and is not contained by the settlement edge, however the minimal distinction from the urban edge also limits its role in preventing sprawl southwards from Woodhouses. This sub-area does lie in an open gap between the towns of Woodhouses and Droylsden, however the gap is not particularly narrow and the River Medlock Valley and Manchester Ashton-Under-Lyne canal would</p>	See Appendix.

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		<p>remain as significant separating features, limiting the role of this piece of land in preserving the gap.</p> <p>The Stage 2 Greater Manchester Green Belt Study Addendum: Assessment of Proposed 2020 GMSF Allocations (<a href="#">07.01.10</a>) states (page 58) that the line of trees was not considered a significant factor in the previous assessment, as the other boundaries of the allocation have no features to create distinction between settlement and countryside. As a boundary feature it was assumed that the tree line would be retained. (The site boundary as amended to remove Flood Zone 3). The analysis suggested a minor level of impact on adjacent Green Belt as a result of the introduction of a more complex inset boundary, and this will still be the case. The harm is still therefore moderate.</p> <p>In terms of mitigation to address the Green Belt harm identified evidence finds that strengthening the boundary of the allocation with surrounding retained Green Belt land could potentially increase the future distinction between inset land and retained Green Belt land, limiting the weakening of the Green Belt boundary as a result of release of the allocation (Stage 2 Assessment of Proposed 2019 GMSF Allocations Appendix B Detailed Allocation Stage 2 Harm Assessment (2020), page 273) (<a href="#">07.01.09</a>).</p> <p>The addendum, which reflects on fewer development parcels and a tighter parcel boundary at Bottom Field farm does not include updated text on mitigation measures.</p> <p>Therefore, no changes are considered necessary, and Policy JP Allocation 13 states development will be required to:</p>	

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.	
JPA13.4	No documentation is available publicly to support compliance with National Planning Policy Framework; no exceptional circumstances have been demonstrated. Unsound / illegal.	The Exceptional Circumstances are set out in the Green Belt Topic Paper and Case for Exceptional Circumstances ( <a href="#">07.01.25</a> ) to amend the Green Belt Boundary.  It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	See Appendix.
	<b>Housing</b>		
JPA13.5	The housing numbers were based on a Conservative Party manifesto pledge to build 300,000 new homes. However, latest population projections suggest that we do not need that many and so releasing Green Belt in Woodhouses would not be necessary if the Government used the most up to date figures. The additional housing exceeds the governments predicted requirements of the area.	Further evidence has been produced in relation to the housing needs over the life time of the plan period. It is appropriate for the overall land supply targets set out within the plan to be based on the housing land need figures, derived from the evidence base. The housing methodology is covered in the Housing Topic Paper ( <a href="#">06.01.03</a> ).  Therefore, it is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	Tracy Raftery
JPA13.6	Properties in Woodhouses would not be affordable or eco homes. House prices and council tax banding command a premium.  Former brownfield site near transport links, which would deliver 30 family homes, concerns that the 9 affordable homes would be mitigated by the demolition and site remedial costs. This is an opportunity to deliver 100% affordable led development.  Would like to see more investment in the existing housing stock. Councils should assist in helping people purchase first homes instead of selling off green belt land.	Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority.  PfE Publication Plan (2021) Policy JP Allocation 13 criterion 2 states development will be required to provide affordable homes in line with local planning policy requirements.	See Appendix.

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		<p>A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.</p> <p>In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Specifically, Policy JP-P 1 ‘Sustainable Places’ which requires development is resource-efficient; and Policy JP-S 2 ‘Carbon and Energy’ requires development to follow the energy hierarchy and sets out the approach for moving towards zero carbon homes.</p> <p>Paragraph 7.11 of the Plan recognises the role of the existing housing stock and that it will be important to make the most out of it. Efforts will be made to further reduce long-term vacancies, including by seeking Government funding and working with property owners, but any significant further reduction in vacancies could begin to make it more difficult for people to move home. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement. In any event, Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock. In addition there are council programmes that support the investment in stock such as <a href="#">Warm Homes Oldham</a> and <a href="#">Empty Homes</a>.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	<b>Ecology / Green Infrastructure</b>		

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA13.7	A diverse array of animal species inhabit the site. Development will have a negative impact wildlife habitat including surrounding wildlife. Trying to bring back nature to urban areas – this just contributes to its destruction.	<p>A Preliminary Ecological Appraisal 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 (<a href="#">10.05.08</a>) confirms the site allocation will not affect any statutory nature conservation sites or local wildlife sites. The site does have potential to support great crested newts, bats, barn owls, ponds and hedgerows. The appraisal states ponds and great crested newt meta-population are present nearby, although the site itself is dominated by buildings. The appraisal sets out the surveys that will be needed to support any planning application.</p> <p>The appraisal concludes (page 38) that substantive ecological constraints of such weight that sites should be withdrawn from consideration for allocation are not present on any of the areas assessed.</p> <p>The appraisal goes on to say that notwithstanding this the above should not be taken to mean that sites are without any ecological constraints. Sites which do go forward for allocation should be further surveyed in line with the recommendations made in this report if they do later come forward for development. Where necessary compensation and mitigation for ecological harm may be required.</p> <p>As such Policy JP Allocation 13 states that development will be required to:</p> <p>6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>multi-functional green infrastructure network with the wider environment; and</p> <p>7. Provide further surveys on amphibians, birds, bats and extended phase 1 habitat surveys to inform planning applications.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA13.8	<p>Consider allocation be considered to be unsound. Welcomes the commitment to retain and enhance the hierarchy of biodiversity within the site and to provide further ecology assessments. However, no ecological mitigation is provided within the concept plan, which indicates full development of the site area. The site may have ecological value that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure and that habitat survey and associated surveys will be required at planning application stage to fully assess ecological impacts and associated mitigation requirements.</p> <p>Development having regard to the ecosystem services opportunity mapping in the improvement and enhancement of Green Infrastructure is noted.</p> <p>Recommend that provision to mitigate for ecological habitats and species may be required excludes recreational activities to fully mitigate/compensate for any loss of habitat or species interest. The development must demonstrate and secure a 10% net increase in Biodiversity Net Gain.</p>	<p>The concept plan (<a href="#">10.05.05-10.05.06</a>) is high level and indicative and at this stage only shows the proposed access and use of land. However, a landscape strategy was prepared to support the high-level concept plan to retain features which contribute to the character of the site. The strategy includes, retaining existing hedgerows; using trees as boundary treatments; connect to existing PROW, to maintain openness; incorporate SUDs; protect and enhance ecological value through planting and SUDs; and provide an attractive green entrance to the site.</p> <p>Informed by the above Policy JP Allocation 13 states development will be required to:</p> <p>4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;</p> <p>5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;</p> <p>6. Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a</p>	The Wildlife Trusts

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		<p>multi-functional green infrastructure network with the wider environment;</p> <p>7. Provide further surveys on amphibians, birds, bats and extended phase 1 habitat surveys to inform planning applications;</p> <p>8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside; and</p> <p>9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements.</p> <p>It is not clear what modification is recommended in relation to provision to mitigate for ecological habitats and species may be required excludes recreational activities to fully mitigate/compensate for any loss of habitat or species interest.</p> <p>Policy JP-G 9 sets out that development will be expected to achieve a net gain in biodiversity.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA13.9	<p>Development encroaches on people’s recreational space and enjoyment of semi natural spaces.</p> <p>It was suggested that the land would be better put to use as a country park. Destruction of green spaces is contrary for an original plan 25 years ago to develop the space for the use of the community. Develop the green space</p>	<p>The site is occupied by a farm building and consists of brownfield land.</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</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>for use of the community. Nature reserve, outdoor sports and activities, woodland to contribute the carbon footprint.</p> <p>Following Brexit, the green belt should be bought back into full production, alongside provision for wildlife and recreation.</p>	<p>amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a>.</p> <p>PfE Policy JP Allocation 13 states development will be required to:</p> <p>4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;</p> <p>5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;</p> <p>8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside;</p> <p>9. Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements;</p> <p>10. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt; and</p> <p>11. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.</p>	

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>The Stage 2 GM Green Belt Study Potential Enhancement Opportunities for the Green Belt Appendix D (<a href="#">07.01.16</a>, page 192 onwards) evidence base highlights opportunities to enhance the surrounding Green Belt around Bottom Field Farm including recreational opportunities.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	<b>Climate Change / Flood Risk / Water efficiency</b>		
JPA13.10	Unsustainable. How does this address climate change - reducing emissions, air pollution etc.	<p>The issue of sustainable development and 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).</p> <p>The site was also subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal (<a href="#">02.01.03-02.01.06</a>). This assessment considered the policy in relation to climate indicators.</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.
JPA13.11	Increased risk of flooding. Building on flood plain not a good idea.	<p>A Strategic Flood Risk Assessment (<a href="#">04.02.01, 04.02.05, 04.02.11-12</a>) has been carried out to inform the PfE and the proposed strategic allocations, including Bottom Field Farm (Woodhouses). In terms of fluvial flood risk, the site was identified as being within Flood Zone 1.</p>	See Appendix.

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		<p>The Level 1 SFRA recommends that the site requires an FRA. The site should consider the site layout and design around the identified flood risk as part of a detailed FRA or drainage strategy.</p> <p>Bottom Field Farm was also scoped for further broadscale fluvial modelling to cover existing gaps in the baseline information. The site boundary of Bottom Field farm was amended to ensure that it did not include Flood Zone 3 as a consequence of this further work (<a href="#">04.02.19</a> SFRA Level 2 Appendix C JFlow Broadscale Modelling Reports). Therefore, the site is effectively in Flood Zone 1 and passes the flood risk sequential test.</p> <p>Policy JP Allocations 13 criterion 16 requires development to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA13.12	Representation on PfE generally but sets out tracked changes UU would like to be made to Bottom Field Farm policy criterion 16 in relation to foul and surface water drainage.	A Strategic Flood Risk Assessment has been undertaken <a href="#">[04.02.01]</a> across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment <a href="#">[04.02.12]</a> at the planning application stage in	United Utilities

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	Also request for additional criterion in relation to water efficiency.	accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk and water efficiency. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter. No change is considered necessary.	
	<b>Character / Landscape</b>		
JPA13.13	<p>This would affect the overall character and of the village negatively.</p> <p>The area is already over-developed. There's been relentless and uncontrolled development throughout the village.</p>	<p>The development is for around 30 homes, on previously developed land. The site allocations at Woodhouses have reduced significantly since GMSF 2019 in recognition that the allocations would have led to over development at Woodhouses.</p> <p>Assessments such as the Historic Environment Assessment (<a href="#">10.05.07</a>) have been undertaken to understand whether the site allocation may harm the significance of surrounding heritage assets which contribute to the character of Woodhouses. The HEA recommendations have informed Policy JP Allocation 13, specifically criterions 14 and 15.</p> <p>PfE is also supported by the Landscape Character Assessment (<a href="#">07.01.06</a>) which sets out recommendations for the different landscape types across Greater Manchester.</p> <p>This has been reflected in the JP Allocation Policy 13 criterion 5 which requires development to:</p> <p>5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys.</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.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA13.14	Bottom Field farm is rural in nature, but the allocation seeks to intensify the use of land. The Landscape Assessment confirms development will have an adverse impact on views towards Woodhouses.	<p>Bottom Field Farm falls within the River Medlock landscape character area and the Incised Urban Fringe Valleys landscape character type as identified within the Landscape Character Assessment (<a href="#">07.01.06</a>), which was prepared to inform preparation of the joint plan. The assessment sensitivity tested two development scenarios against each identified landscape character area. For this character area the assessment concluded that development of two to three storey residential development would have a medium to high sensitivity. The report sets out policy guidance and recommendations to mitigate impact on the landscape.</p> <p>The principles behind the high-level indicative concept plan prepared for the allocation, as outlined in the Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>) paragraph 17.3, encourage development and urban form to be contextually responsive to the surrounding built and natural landscapes. A landscape strategy was prepared to support the concept plan to retain features which contribute to the character of the site.</p> <p>PfE Policy JP Allocation 13 requires development to:</p> <p>4. Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation; and</p> <p>5. Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys.</p>	P&D Northern Asset Management Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	
	<b>Infrastructure – education / health</b>		
JPA13.15	There is one primary school in the village, which is oversubscribed. The Woodhouses voluntary school will struggle to accept another 40-80 children - the total school capacity is only 140 children. Failsworth secondary school is at capacity. This would make local education provision impossible for families locally here and push existing children out of the catchment but without being able to access other catchments.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policy JP-P 5 which states where appropriate, housing developments will be required to make a financial contribution to the provision of additional school places and/or set aside land for a new school, proportionate to the additional demand that they would generate.</p> <p>Policy Allocation JP 13 criterion 12 also states development must contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority.</p> <p>The Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>), section 22 outlines details of education infrastructure.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>In addition, Oldham Council has recently published an <a href="#">Education Contribution Interim Planning Paper</a>, which sets out how the Council will deal with education contributions for the borough when determining planning applications for relevant developments that may impact on education provision, such as school places. It was adopted at Cabinet on 20 September 2021.</p>	See Appendix.
JPA13.16	It is difficult to get an appointment now at doctors or dentists.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policy JP-P6 which	Tracey Thompsn

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		<p>requires, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.</p> <p>Policy JP Allocation 13 criterion 13 requires any development of the site to contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision.</p> <p>The Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>), section 23 outlines details of health infrastructure.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	
JPA13.17	Plans need to be in place to address stretched local services and impacts on infrastructure of the sites with planning permission also being taken into account.	<p>Please see responses on transport, education and health infrastructure (Rows JPA13.15-16 and JPA13.18).</p> <p>No further changes are considered necessary.</p>	See Appendix.
	<b>Highways / Traffic / Access</b>		
JPA13.18	<p>The sites identified are not capable of delivering sustainable development. These sites have limited access, are not well served by motorways and public transport, are not in easy walking distance of any train or Metrolink service and are served by a limited bus service.</p> <p>The vision talks of public transport and transport infrastructure as though they're all available. The idea every new family will cycle everywhere or get the tram is such London centric thinking. The dated traffic census and figures on cars per household just don't hold water.</p>	<p>PfE is a strategic planning document and is considered to be consistent with NPPF. The Plan as a whole sets out an appropriate strategic policy framework to deliver the overall Vision and Objectives. The relevant thematic and allocation policies are supported by a proportionate evidence base. As justified by the evidence, policies require development to incorporate appropriate mitigation to ensure that development will come forward over the lifetime of the plan to deliver the Vision and Objectives. As the Plan should be read as a whole, this approach is considered consistent with NPPF.</p> <p>Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>) section 10 outlines that the site access arrangement has been developed to</p>	See Appendix.

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		<p>illustrate that there is a practical option for site access in this location and to develop indicative cost estimations. It is assumed that a detailed design consistent with Greater Manchester’s best practice Streets for All highway design principles will be required at the more detailed planning application stage.</p> <p>The Topic Paper highlights that the Bottom Field Farm site is located adjacent to Hartshead Crescent. Hartshead Crescent is a residential street with footpaths, full street lighting and a 20mph speed limit. This road also presents carriageway width restrictions and on-street parking. The road continues directly into the proposed allocation where it forms a direct access to the existing farm buildings.</p> <p>It is proposed that the Hartshead Crescent access will comprise modification to the existing three-arm priority junction to make it suitable for development traffic. The Locality Assessment also recommends, in order to allow for safe right-turn movements across oncoming traffic into the site, that the site access is given priority, and that traffic approaching on Hartshead Crescent to the east gives way.</p> <p>Further details of the suggested access arrangements for the allocation can be found in the Transport Locality Assessments – Introductory Note and Assessment – Oldham (<a href="#">09.01.11</a>).</p> <p>Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>) outlines public transport accessibility in detail and a number of mitigation measures.</p> <p>Policy JP-C 1 ‘An Integrated Network’ sets out measures for ensuring a pattern of development that minimises both the need to</p>	

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		<p>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>PFE Policy JP Allocation 13 states development will be required to:</p> <p>3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site; and</p> <p>8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA13.19	The site is unlikely to lead to impacts on the SRN from an individual or cumulative perspective.	Noted.	National Highways
JPA13.20	<p>This would add much additional traffic pressure onto a small road where children are present. There is already too much traffic in Woodhouses. Traffic controls mentioned.</p> <p>Assume house buyers will be commuters as we do not have local employment capacity to support perceived incomes, who will increase traffic.</p>	Section 10 of the Bottom Field Farm Allocation Topic Paper ( <a href="#">10.05.33</a> ) outlines the findings from the Locality Assessments. The completion of locality assessments on the proposed strategic allocations has ensured that each site has been subject to a thorough, robust and consistent evaluation of its likely contribution to transport impacts in Greater Manchester. Sites that have been selected for inclusion in the Joint DPD have been found to be suitable from a transport perspective and satisfy the requirements	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>of NPPF in that they do not place an unacceptable impact on highway safety or severe impact on the road network.</p> <p>Bottom Field Farm Allocation Topic Paper also outlines the mitigation measures that would be required.</p> <p>Based on the information contained within the Locality Assessment it is concluded that the traffic impacts of the site are less than severe. In summary, the assessment has provided an initial indication that the allocation is deliverable.</p> <p>As the allocation moves through the planning process, the specific interventions required will be identified to ensure the network works effectively based on transport network conditions at the time of the planning application. Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment / Transport Statement and Travel Plan where appropriate, and that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p> <p>Policy JP Allocation 13 requires development to:</p> <p>3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site.</p>	

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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.	
JPA13.21	Concern in relation to Pike Avenue, a narrow road, which only allows for single parking and is mainly used for over spill of cars from residents on Stanford Drive. Will the field at the end of Pike Avenue be included in the development of Bottom Field Farm?	<p>The allocation is limited to that shown within the red line within PfE.</p> <p>Policy JP Allocation 13 requires development to:</p> <p>3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site.</p> <p>No changes are considered necessary to the PfE plan.</p>	PJ And VA Mansell
JPA13.22	Rights of Way, footpaths and bridleways running through the areas are affected by the proposed development, taking away public walking / rambling paths which lead to Ashton. These need to be protected meaning they can continue to be used by pedestrians, cyclists and horse riders.	<p>Policy JP Allocation 13 requires development to:</p> <p>3. Provide for appropriate access to and from the site in liaison with the local highway authority and take account of and deliver any other improvements that may be needed to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site; and</p> <p>8. Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network to encourage active travel and improve connections and access to adjoining communities and countryside.</p> <p>Paragraph 10.23 of the Bottom Field Farm Allocation Topic Paper outlines that the Locality Assessment (<a href="#">10.05.33</a>) recommends existing PRowWs that either pass near or cross the proposed site</p>	Peter Pawson

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		<p>should be positively upgraded, with both PRowS and the internal pedestrian/ cycle network of the site being constructed to the standards set out by the Bee Network.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	<b>Agriculture / Amenity</b>		
JPA13.23	This will remove the last working farm in Failsworth on bottom field farm, is still in use as an active farm and stables, which teaches children to ride horses and the plans are much wider to damage green belt.	<p>Noted. The site was put forward during the call for site exercise as an available site.</p> <p>No changes are considered necessary to the PfE plan.</p>	See Appendix.
JPA13.24	Several buildings would have their privacy infringed by the development.	<p>Policies such as Policy JP-P 1 'Sustainable Places' will ensure that development incorporates high quality design.</p> <p>Policies in the <a href="#">Oldham Local Plan</a> will also be applied, such as existing Policy 9 'Local Environment' which states the council will ensure development does not cause significant harm to the amenity of the occupants and future occupants of the development or to existing and future neighbouring occupants or users through impacts on privacy, safety and security, noise, pollution, the visual appearance of an area, access to daylight or other nuisances.</p> <p>Therefore, amenity issues will be considered as part of any planning application and it is not considered necessary to make any changes to the PfE plan.</p>	Peter Pawson
JPA13.25	The building here is in the middle of green belt, only a tiny fraction is a prior building.	<p>The site is on the edge of Woodhouses, off Hartshead Crescent and comprises farm buildings and an access road.</p> <p>No changes to the PfE plan are necessary.</p>	Peter Pawson
	<b>Minerals</b>		

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JPA13.26	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
	<b>Alternative Sites / Viability</b>		
JPA13.27	Look elsewhere in the borough.	It is considered that an appropriate evidence base has been prepared to support the plan and the site selection process. Evidence in relation to the site selection process is set out within the Site Selection Background Paper <a href="#">[03.04.01]</a> .  No changes are considered necessary to the PfE plan.	Peter Pawson
JPA13.28	There has been a brownfield site for years behind the church off Ashton Road, Failsworth. Why is this site not being used before Green Belt?	Evidence in relation to the site selection process is set out within the Site Selection Background Paper <a href="#">[03.04.01]</a> .  The Bottom Field Farm Allocation Topic Paper ( <a href="#">10.05.33</a> ) Appendix 7 includes a list of those sites submitted within Area of Search OL-AS-8.  It is not clear where this site is however, Oldham Council prepares annually a <a href="#">Strategic Housing Land Availability Assessment</a> (SHLAA) identifying land that might have potential for housing at some stage in the future and a <a href="#">brownfield land register</a> .  It is considered that an appropriate evidence base has been prepared to support the plan and the site selection process and no changes are considered necessary to the PfE plan.	PJ And VA Mansell

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA13.29	<p>P&amp;D are promoting an alternative site (north of Woodhouses) for residential development. Site was in the 2019 GMSF and then removed. Nine appendices support the representation. Do not consider the evidence is robust, which should have considered the P&amp;D site in the site selection process and SA as a reasonable alternative. The P&amp;D site is suitable and available and should be reconsidered, this is proven by the fact it was previously allocated in the 2019 GMSF. A description of the site, its constraints, surroundings and the proposed development (170 homes) is provided. Background to the site is provided and the current situation of providing 30 homes instead of 260. The representation includes comments against Policy JP-H-1 to argue that there is a shortfall in suitable, deliverable SHLAA sites. Also consider that in all allocations in Oldham a 30% reduction should be built into the supply assessment for these sites due to constraints. The P&amp;D site can help meet this shortfall.</p> <p>Bottom Field Farm is not of a scale worth of a strategic allocation. The site would be better as a SHLAA / windfall site.</p> <p>No evidence why the P&amp;D site is not suitable and why Bottom Field Farm is more favorable. There is no comparable analysis of the sites. No definition of over development. Do not know why only 30 homes is proposed in Woodhouses which was identified as an area of search.</p> <p>Demolition and remediation may cause unexpected delays.</p> <p>The site is not viable and therefore it questions whether the site will be delivered. It may not deliver affordable housing and vacant building credit may be used. The P&amp;D site would not face these issues. Not clear how surrounding agricultural land will be managed. The only evidence for taking preference over Bottom Field Farm is that it is brownfield. The evidence needs to be rectified. No confidence that the allocations will be delivered in the plan period.</p>	<p>The site has been submitted and considered previously as part of the site selection process and is addressed in the Omissions document. See Call for Sites ID 1453975604425 (Land off Failsworth Road / Medlock Road; and Call for Sites ID 1452529193572 (Land at Woodhouses).</p> <p>Appendix 7 of the Site Selection Paper <a href="#">(03.04.09)</a> highlights the reasons why the P&amp;D site, formerly part of the Woodhosues allocation, was removed and no longer allocated.</p> <p>Evidence in relation to the site selection process is set out within the Site Selection Background Paper <a href="#">[03.04.01]</a>.</p> <p>The housing methodology is covered in the Housing Background Paper (July 2021) <a href="#">(06.01.03)</a>.</p> <p>The delivery rates, based on recent evidence, demonstrate that the majority of the allocations are deliverable within the plan period. Details of the housing land supply and delivery can also be found in the Housing Topic Paper <a href="#">[06.01.03]</a>.</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 growth and spatial distribution is set out in the Growth and Spatial Options Paper <a href="#">[02.01.10]</a>.</p>	P&D Northern Asset Management Ltd

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		<p>This is reiterated in Chapter 6 (Paragraph 6.87) of the Housing Topic Paper (<a href="#">06.01.03</a>).</p> <p>Bottom Field Farm comprises brownfield land in the Green Belt and its release as a strategic site will aid its delivery and the delivery of homes to meet the borough's housing need.</p> <p>The Bottom Field Farm Allocation Topic Paper (<a href="#">10.05.33</a>) section 24 outlines the results from the Three dragons Viability Assessment. Bottom Field Farm is viable when a sensitivity test is applied. Paragraph 24.13 states a sensitivity test was carried out that increased selling prices by 10%. The council consider that the location of the site in Woodhouses within a strong housing market provides the potential to deliver a range of high-quality housing in an appealing location. Recent development in the area has shown it commands high values. It is therefore reasonable to assume that a development in this location would be popular with accelerated sales rates and values.</p> <p>PfE Policy JP-D 2 'Developer Contributions' states we will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms and sets out the mechanisms for how this will be achieved.</p> <p>It is considered that an appropriate evidence base has been prepared to support the allocations identified within the Plan. Therefore, no changes are considered necessary to the plan.</p>	
JPA13.30	Attachment makes comments against PfE generally and on behalf of land at Ashton Road / Bardlsey Vale Ashton, Oldham, which was in the 2019 GMSF. No technical evidence to support sites removal. The justification for	The strategic allocation is proposed to deliver around 30 homes. It is not an exact figure. The high-level indicative concept plan ( <a href="#">10.05.05 – 10.05.06</a> ) identified a developable area of 0.83ha and a	Sophia Flemming Consulting Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>removal is limited. Promotional material included and site description, constraints etc.</p> <p>In relation to Bottom Field Farm the site capacity has now reduced from 260 to 30 dwellings and the PRoW through the Site is a significant constraint to deliverability timeframes. Based on the sites highlighted (Beal Valley, Bottom Field Farm, Broadbent Moss, Chew Brook Vale and Land South of Coal Pit Lane), consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the plan.</p>	<p>proposed density of around 36 homes per hectare. The indicative concept plan has taken the PROW into account.</p> <p>It is considered that an appropriate evidence base has been prepared to support the allocations identified within the Plan. The delivery rates, based on recent evidence, demonstrate that the majority of the allocations are deliverable within the plan period. Details of the housing land supply and delivery can also be found in the Housing Topic Paper <a href="#">[06.01.03]</a>.</p> <p>The site at Ashton Road / Bardsley Vale is addressed in the Omissions paper.</p> <p>No further changes are required to the plan.</p>	
	<b>Other</b>		
JPA13.31	<p>Process is corrupt and greedy. Will not benefit the local community, only farmers. People will lose all faith in our so called representative leadership.</p>	<p>Places for Everyone has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan and the introductory chapter (pages 3 to 5) of the Bottom Field Farm Allocation Topic Paper <a href="#">[10.05.33]</a>. No change to the policy is considered necessary.</p> <p>No change necessary.</p>	See Appendix.
JPA13.32	<p>The development on the side of Woodhouses park has been a farce. The houses were built higher than their approved plans, the pond relocation to maintain the diverse flora and fauna was simply forgotten and its simply a chess move to establish buildings adjacent to bottom Field Farm</p>	<p>Unable to comment on a previous planning application as part of PfE. Enforcement issues can be addressed to the enforcement team at Oldham Council.</p> <p>The allocation and any subsequent planning applications for development at Bottom Field Farm, will be treated on its own merits, in line with requirements set out in JP Allocation 13.</p>	Jason Richards

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA13.33	Representation made on PfE generally, with an interest in a site in Trafford. Not applicable to Bottom field farm.	This representation is not applicable to Bottom Field Farm site allocation.	Morland Capital Partners No1 Ltd
JPA13.34	No comments provided. Sound boxes ticked.	Support welcomed.	See Appendix.
JPA13.35	Plan is unsound – no specific comments.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA13 Bottom Field Farm.	See Appendix.

## PfE 2021 Policy JP Allocation 14 – Broadbent Moss

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Principle of development / Use of Green Belt</b>		
JPA14.1	<p>Disagree with loss of Green Belt. It should not be built upon. Development on Green Belt should be removed with land retained as Green Belt. There is no evidenced justification for this site to be removed from the Green Belt. There are no exceptional circumstances. Guidelines in NPPF paragraph 83 "In order to make a change to the Green Belt boundary in the local plan there have to be "exceptional circumstances" have not been followed.</p> <p>Following Brexit, the green belt land should be readily available to be brought back into full production, alongside provision for wildlife and recreation.</p>	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> 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.</p> <p>Section 14 of the Broadbent Moss Allocation Topic Paper <a href="#">10.05.34</a> 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 <a href="#">07.01.25</a>.</p> <p>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 <a href="#">[05.01.03]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
JPA14.2	Proposals set a precedent for developers to justify building on Green Belt when they think justified.	As set out at paragraph 8.54 of the PfE Plan our Green Belt was originally designated in full in 1984 as part of the Greater Manchester Green Belt. It has since seen a series of minor amendments through individual district plans. The scale of development that needs to be accommodated within the Plan area up to 2037 means that some changes to the Green Belt	Robert Mayall

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		<p>boundaries are necessary in line with the paragraphs 140 and 141 of NPPF. The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. Development in the redefined Green Belt will be assessed in line with national planning policy and Local Plans, with proposals considered on a case by case basis. No changes are considered necessary.</p>	
JPA14.3	<p>Proposal goes against Green Belt legislation to keep in check the unrestricted sprawl of large built-up areas and preventing neighbouring towns from merging into one another. Proposals will erode distinction between Shaw and Oldham, creating one continuous landscape. The land serves important Green Belt purposes and has local health benefits.</p> <p>Proposal is detrimental by means of the loss of open space which affords an 'open / green lung' minimising urban sprawl - between the Derker / Watersheddings / Moorside developed area and the Higginshaw / Boundary / Heyside developed area.</p>	<p>The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary <a href="#">[07.01.25]</a>. Section 14 of the Broadbent Moss Allocation Topic Paper <a href="#">[10.05.34]</a> also sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.</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 Broadbent Moss allocation from the Green Belt are set out in chapter 5 of the Broadbent Moss Topic Paper <a href="#">[10.05.34, pages 11 to 13]</a>.</p> <p>The importance of health and well-being is recognised through the <a href="#">Publication Plan</a>, with particular reference in Policy JP-P1 Sustainable Places and Policy JP-P6 Health. In relation to JPA 14 specifically, criterion 9) sets out that any development will be required to enhance pedestrian and cycling as part of a multi-functional green infrastructure network (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, enhance linkages with the neighbouring</p>	See Appendix

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		<p>communities and countryside and provide opportunities for leisure and recreation. The <a href="#">Publication Plan</a> needs to be read as whole.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.4	<p>Insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been insufficient assessment of reasonable alternatives. In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.</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 <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The 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 <a href="#">[02.01.10]</a>. Evidence in relation to the housing land supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> 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 JPA14 Broadbent Moss. No changes are considered necessary.</p>	Save Shaw's Green Belt
JPA14.5	<p>The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.</p>	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">[07.01.25]</a>.</p>	Save Shaw's Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>Furthermore, chapter 14 of the Broadbent Moss Allocation Topic Paper <a href="#">[10.05.34]</a> sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.6	<p>Of the 82ha allocated, it is only anticipated to develop 42ha. The Green Belt assessment, which for this was split into three sub-areas concluded that the allocation makes a relatively significant contribution to checking the sprawl of GM and preventing encroachment on the countryside, and a relatively significant contribution to maintaining separation between Royton and the Sholver / Moorside suburb of Oldham. The release of land from the Green Belt was considered to have moderate to high harm on Green Belt purposes and a weakening of the Green Belt boundary.</p> <p>Mitigation for impacts on Green Belt purposes, landscape character, ecological designations and potential protected species habitats.</p>	<p>Chapter 14 of the Broadbent Moss Allocation Topic Paper <a href="#">[10.05.34]</a> summarised evidence in relation to the Green Belt, including the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt <a href="#">[07.01.12]</a> (see pages 46 to 47 of the topic paper). In response, criterion 12 of Policy JPA14 Broadbent Moss requires any development on the site to contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt, as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary..</p>	SGMGB Oldham Groups
JPA14.7	<p>With approximately half of the site needing to be set aside for green infrastructure and mitigation to offset the significant impacts of removing the land from the Green Belt in the first place, alongside facilitating future development with currently unknown mitigation requirements to address aspects such as flood risk/drainage and ecological mitigation, the proposed Green Belt release is not justified or robust. In addition to mitigation for impact on Green Belt purposes, development proposals would also need to mitigate the medium to high impact on designated landscape character.</p>	<p>Section 3 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> sets out details of the site. The gross site area measures around 82 hectares (ha), with the developable area measuring around 48ha. This has been informed by site constraints, including topography, ecology, flood risk and further evidence that has been prepared including the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt <a href="#">[07.01.12]</a> (details of which can be found at pages 46 to 47 of the Broadbent Moss Allocation Topic Paper <a href="#">[10.05.34]</a>. Details can also be found in the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.10]</a> and Broadbent Moss indicative concept plan <a href="#">[10.05.09]</a>.</p> <p>Criteria 9) and 10) of JPA14 Broadbent Moss require any development on the site to:</p>	SGMGB Oldham Groups

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		<ul style="list-style-type: none"> <li>• Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines;</li> <li>• Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.</li> </ul> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
	<b>Scale of Development</b>		
JPA14.8	The scale of the development is too large. There are too many houses planned. The area is already over-populated. Proposal is too much for this area to sustain without adding serious pressure and destroying one of the few benefits of living in Oldham which is easy access to nature and countryside.	<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 <a href="#">[02.01.10]</a> and Housing Topic Paper <a href="#">[06.01.03]</a> which includes boosting the competitiveness of the north of the conurbation.</p> <p>Policy JPA 14 Broadbent Moss recognises that it is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and that any development takes account of the increased demand it may place on existing provision, reflected in the requirements set out at criteria 16,17 and 18 of Policy JPA14 Broadbent Moss.</p> <p>Furthermore, Paragraph 11.161 of JPA 14 Broadbent Moss also sets out that retaining large proportion of the site as Green Belt provides an opportunity to significantly enhance the green infrastructure and biodiversity value of the site, enhancing the existing assets (such as the priority habitats) and improving access to the open countryside for the local community. Again, this is reflected in the requirements of JPA 14.</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 JPA14 Broadbent Moss. No changes are considered necessary.	
JPA14.9	Scale back the number of houses, and plan for a nice environment, with opportunity for eco friendly, architecturally interesting homes. Be innovative and build a community that is sustainable, attractive and somewhere where people want to move to.	<p>In relation to scale of development 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 <a href="#">[02.01.10]</a> and Housing Topic Paper <a href="#">[06.01.03]</a> which includes boosting the competitiveness of the north of the conurbation. Policy JP-S1 Sustainable Development sets out an overarching approach to tackling climate change and further requirements are set out in Policy JP-S2 Carbon and Energy and Policy JP-P1 Sustainable Places.</p> <p>The Publication Plan, including the Broadbent Moss allocation, has also been subject to an Integrated Assessment <a href="#">[02.01.02]</a>, incorporating the requirements of Strategic Environmental Assessment and Sustainability. This assessment considered the policies in relation to climate indicators and a summary of the findings in relation to this allocation can be found in chapters 8 and 9 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> (pages 15 to 19).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	Victoria Smith Scott
JPA14.10	The additional housing and warehousing exceeds the governments predicted requirements of the area.	Evidence to support preparation of the Plan has been produced in relation to the housing needs and employment land demand over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the plan (tables 6.1 and 6.2) to be based on the housing and employment land need figures, derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> sets out the methodology for calculating housing need; and the Employment Topic Paper <a href="#">[05.01.04]</a> for employment need.	Tracy Raftery

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	
JPA14.11	Concerned about the juxtaposition of the Beal Valley and Broadbent Moss with the Cowlshaw development; the infrastructure implications must be well considered.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as policies JP-G6 Urban Green Space, JP-P1 Sustainable Places and JP- D2 Developer Contributions which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.</p> <p>Furthermore, policies JPA 12 Beal Valley, JPA 14 Broadbent Moss and JPA Cowlshaw set out site-specific infrastructure requirements. It is important that the Plan is read as a whole. No changes are considered necessary.</p>	Debbie Abrahams MP
JPA14.12	The Places for Everyone proposals unjustly impose a disproportionate additional housing burden in the Oldham Borough upon the residents of just two wards, Crompton and Shaw - Places for Everyone assumes delivery of 12,800 new homes in Oldham by 2037, based on the government's figures. Of these, under the latest plan, the proposal is to build 2,390 new homes on the Beal Valley (480) (JP Allocation 12), Broadbent Moss (1,450) (JP Allocation 14) and at Cowlshaw (460) (JP Allocation 16); almost one fifth of the total in only two out of twenty electoral wards.	<p>The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE. As shown in Table 7.13 of the Publication Plan the allocations in Oldham proposed through PfE provide a total of 2,176 homes out of a total land supply of 13,131 (2020-37) across the borough.</p> <p>With regards to the specific sites mentioned information can be found at section 5 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>, Beal Valley Topic Paper <a href="#">[10.05.32]</a> and the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>. As outlined in the reasoned justification for each policy, the three sites are considered to be in sustainable and accessible locations and in successful and attractive neighbourhoods with connection to neighbouring areas. Beal Valley and Broadbent Moss also have the potential for greater connectivity through the proposed new Metrolink stop, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond.</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 <a href="#">[02.01.10]</a> and these allocations are considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective</p>	Cllr Howard Sykes

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		<p>of boosting Northern Competitiveness, whilst contributing to meeting the housing need across Oldham.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.13	Concerns raised regarding the developable area. This will be impacted on by need for ecological and flood risk mitigation – this should have been considered in advance of setting an indication of predicted residential unit yield.	<p>Section 3 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> sets out details of the site. The gross site area measures around 82 hectares (ha), with the developable area measuring around 48ha. This has been informed by site constraints, including topography, ecology and flood risk. Details can be found in the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.10]</a> and Broadbent Moss indicative concept plan <a href="#">[10.05.09]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	SGMGB Oldham Groups
	<b>Housing</b>		
JPA14.14	Question validity of proposals, origin of figures, how they are decided and whether they are necessary.	The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE. Evidence in relation to the housing needs can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> which sets out the methodology for calculating housing need. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	Christopher Tansley
JPA14.15	Most of the proposed housing will not be affordable and is not housing for those that actually require a home.	Criterion 2) of JPA 14 Broadbent Moss sets out that any development will be required to provide a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. Whilst criterion 3 requires the provision of affordable homes in line with local planning policy requirements. Further information is also provided in paragraphs 11.153 and 11.154 of the <a href="#">Publication Plan</a> . No changes are considered necessary.	See Appendix

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JPA14.16	<p>Plan refers to the distinctive character of the area yet plan to destroy it through proposals to encourage the building of housing that is not needed in this area.</p> <p>The proposals to not meet the area's objectively assessed needs (NPPF 35d)</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 <a href="#">[02.01.10]</a>. Evidence has been produced in relation to the housing needs and employment land demand over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the Plan (tables 6.1 and 6.2) to be based on the housing and employment land need figures, derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> sets out the methodology for calculating housing need; and the Employment Topic Paper <a href="#">[05.01.04]</a> for employment need.</p> <p>With regards to the distinctive character of the area Policy JP-P1 Sustainable Places list the key attributes that all development, wherever appropriate, should be consistent with. This includes:</p> <ul style="list-style-type: none"> <li>• Responding to the natural environment, landscape features, historic environment and local history and culture; and</li> <li>• Respecting and acknowledging the character and identity of the locality in terms of design, siting, size, scale and material.</li> </ul> <p>Reflecting this JPA14 Broadbent Moss requires development on the site be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
JPA14.17	We need more affordable environmentally friendly housing.	<p>Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policy states that development will be required to “provide for affordable homes in line with local planning policy requirements”. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.</p>	Vicky Harper

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		<p>In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Specifically, policy JP-S 2 'Carbon and Energy' includes measures related to energy efficiency within homes. No changes are considered necessary.</p>	
JPA14.18	<p>Concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply.</p> <p>There are empty properties on the streets nearby. A simple check on a house buying website such as Rightmove will show hundreds of available properties to suit all budgets. More investment needed in existing housing stock. Offer grants for home insulation, roof repair and brickwork pointing, assistance to fit affordable heating and safe electrical circuits.</p> <p>The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.</p>	<p>Evidence has been produced in relation to the housing needs over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the Plan to be based on the housing need figures derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> 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.</p> <p>Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 677 new homes per year. The PfE sets out a proposed housing requirement for Oldham of 677 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper. Compared to the GMSF 2019, Oldham's housing need, as set out in the PfE 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.</p> <p>With regards to consideration being given to reasonable alternatives (including those in the urban area), 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 <a href="#">[02.01.10]</a>.</p> <p>Furthermore, the Plan places a strong focus on directing new housing towards previously-developed sites within the existing urban area. A large number of previously-developed sites suitable for housing have been</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>identified in the council's Brownfield Register and Strategic Housing Land Availability Assessment. Paragraph 7.11 of the <a href="#">Publication Plan</a> also recognises the role of the existing housing stock and that it will be important to make the most out of it. In addition there are council programmes that support the investment in stock such as <a href="#">Warm Homes Oldham</a> and <a href="#">Empty Homes</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.19	There are proposals for 400 additional homes on the old Shop Direct Mill site off Linney Lane, Shaw. This needs to be considered in the context of plans under PfE.	The Shop Direct site at Linney Lane forms part of the housing land supply (SHA2131). Details can be found on <a href="#">MappingGM</a> and in the council's Brownfield Register and Strategic Housing Land Availability Assessment. No changes are considered necessary.	Debbie Abrahams MP
JPA14.20	The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of the policy. It should be amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.	The approach taken in PfE is appropriate and consistent with NPPF. It is considered that detailed affordable housing targets are most appropriately set at the local level, through Local Plans, whilst ensuring that they contribute to the overall ambition of PfE and Policy JP-H2 Affordability of New Housing. No changes are considered necessary.	Save Shaw's Green Belt
JPA14.21	Affordability problems in the Oldham Borough are severely distorted, stemming mostly from Saddleworth. Effectively affordability is being used as an exceptional circumstance. It is highly questionable that the affordability adjustment complies with NPPF #140. These houses are not being built to serve housing need, but rather to expand market choice. Allocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.	<a href="#">The 06.01.02 Greater Manchester Strategic Housing Market Assessment</a> Chapter 3.2 Standard methodology: Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provide detailed information on the need for affordable housing in Greater Manchester, including Oldham. As detailed in <a href="#">Document 06.01.03 Housing Topic Paper</a> Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. This includes that an adjustment should be made to consider market signals, specifically the affordability of housing. We do not consider that exceptional circumstances exist to justify departure from the standard methodology.	Save Shaw's Green Belt

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		<p>Policy JPA14 Broadbent Moss requires development on the site to provide for affordable homes in line with local planning policy requirements. Paragraph 11.154 goes on to state that this will include a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Local evidence in the form of Oldham’s Housing Strategy and Local Housing Needs Assessment will inform the Local Plan affordable housing policy.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.22	<p>Believe there is going to be a disregard for the housing needs of the residents of Shaw &amp; Crompton, with the majority of houses being unaffordable for the wages people earn who live in the area. With not enough houses being also for the elderly which is the demographic of Shaw &amp; Crompton. A lot of people are elderly. There are supporting documents attached.</p>	<p>Policy JPH3 Type, Size and Design of New Housing requires development across the plan area to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods. As reflected in criteria 1, 2 and 3 of JPA14 Broadbent Moss, Policy JPH3 goes on to say that 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. Where appropriate, this should include incorporating specialist housing for older households and vulnerable people. Local evidence in the form of Oldham’s Housing Strategy and Local Housing Needs Assessment will inform the range of dwelling types and sizes to be delivered.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	Save Shaw’s Green Belt
JPA14.23	<p>Brownfield Housing Fund Allocation to be accessed.</p> <p>When a large proportion of the local population cannot afford to purchase their first home, councils should be able to step in and assist instead of selling off Green Belt.</p>	<p>The Delivering the Plan chapter of the <a href="#">Publication Plan</a> sets out our approach to implementation and delivery, recognising that the level of growth proposed (across the plan as a whole) will require substantial amounts of investment from both the public and the private sector. It will be</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		important that the Plan is supported by sources of funding and delivery mechanisms. However, many of the necessary actions lie outside its scope and will be taken forward through other strategies, plans and programmes. No changes are considered necessary.	
	<b>Brownfield First</b>		
JPA14.24	Prioritise Brownfield land for development and invest in more underused buildings and empty homes. Brownfield first policy has been ignored.	<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, 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 employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
JPA14.25	Use of brownfield sites is commendable.	Comment noted	Lynne Hastings
JPA14.26	We have put in a FoI request (in conjunction with Save Royton's Greenbelt) regarding the Local Plan consultation Oldham has 76 unlisted mills, some of which should be convertible to housing. We filed an FOI and the council refused to give us the information. By doing so, and by failing to survey this land for GMSF/PfE Oldham's GB release is not compliant with NPPF #141. We believe a Brownfield First Approach has not been followed. This information on Brownfield Sites, we believe is vital to the decision making behind the plan. Without this information it is impossible to have an informed opinion on the use of Brownfield sites and their regeneration.	<p>Regarding comments about the FoI request, this is not a matter for PfE and would be considered separately to the plan preparation process.</p> <p>Please see row JPA14.24 for further information regards the Plan's clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. A large number of previously-developed sites suitable for housing have been identified as part of the housing land supply (as shown in the council's Brownfield Register and Strategic Housing Land Availability Assessment) which in Oldham has been informed by the draft emerging Mill Strategy.</p>	Save Shaw's Green Belt

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		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	
	<b>Highways / access / transport</b>		
JPA14.27	How does this address climate change - reducing emissions - congestion - not exactly close to major rail links and motorways.	<p>The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The site was also subject to assessment as part of the <a href="#">Strategic Environmental Assessment</a> within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.</p> <p>Policy JP-C 1 ‘An Integrated Network’ also 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>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 the GM Transport Strategy 2040 <a href="#">[09.01.01]</a> and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a>. Furthermore, as set out in paragraph 11.156 of the <a href="#">Publication Plan</a>, it is considered that the site is in a sustainable and accessible location and has the potential for greater connectivity through the proposed new Metrolink stop.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
JPA14.28	The proposals would lead to further traffic congestion on roads already gridlocked / with standing traffic and pollution issues. Cars already have to go	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	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>through town centres with standing traffic in order to reach motorway connections or to go into Manchester.</p> <p>The surrounding road network cannot cope of with extra traffic and residents. There is no suitable infrastructure to accommodate the additional cars.</p> <p>Reference also made to congestion on specific routes including - impact on Ripponden Road which is already gridlocked most evenings. Especially when there is traffic from the motorway diverted when there is an accident</p>	<p>distance travelled by unsustainable modes to jobs, housing and other key services; and includes measures to increase cycling and walking infrastructure.</p> <p>The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within chapter 10 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>, Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.29	<p>This site will likely contribute to cumulative impacts on the SRN due to its close proximity to other PfE allocations including Beal Valley.</p> <p>At this stage, it is WSP’s opinion that the transport evidence underpinning this allocation 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 – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, 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>	National Highways

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<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 the GM Transport Strategy 2040 <a href="#">[09.01.01]</a> and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 <a href="#">[09.01.02]</a>. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.30	<p>Given there are existing issues with congestion in and around the site, P&amp;D question if this is the most suitable location for an allocation of this size. The addition of this level of development is likely to cause an unacceptable impact on highway safety. Even with the significant levels of mitigation measures in place, as proposed, the residual cumulative impacts on the road network is likely to be severe and therefore P&amp;D question the suitability of this site for residential and employment development.</p>	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. As stated in paragraph 10.2 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> it is important to note that the mitigation schemes developed are intended to demonstrate only that significant transport impacts of the allocation can be appropriately ameliorated. As such they are indicative only and are not intended to act as definitive proposal for the mitigation of any allocation. Detailed proposals would need to be developed as part of a Transport Assessment submitted as part of a planning application.</p>	PD Northern Trust Asset Management

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		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	
JPA14.31	Landowner / developer promoter comment: In relation to JPA14 6) the traffic impact methodology assumptions contained within the locality assessments for JPA14 has been considered. Further consideration of the requirement and delivery of these mitigation measures will be required at the planning application stage. Welcome the conclusion of the Addendum which states the following in Paragraph 6.6.1, although there are some reservations regarding the traffic generation assumptions used to assess the traffic impact of the allocation. However, it is concluded that this provides a robust assessment of the impacts of the Broadbent Moss allocation on the highway network.	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a> have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking) (see Table 12, page C40 and C41).</p> <p>Paragraph 1.2.7 of the Locality Assessment recognises that the mitigation schemes developed are intended to demonstrate only that significant transport impacts of the Allocation can be appropriately ameliorated. As such they are indicative only and are not intended to act as a definitive proposal for the mitigation of any Allocation, which would be developed as part of a Transport Assessment submitted as part of a planning application at a later date, as required by Policy JP-C7 Transport Requirements of New Development.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	CCW&G
JPA14.32	The housing proposed 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>It is considered that the site is in a sustainable and accessible location, on the edge of a large area of open land. It is located near to existing neighbouring residential communities and has the potential for greater</p>	Lynne Hastings

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>connectivity through the proposed new Metrolink stop, which would serve both this and the Beal Valley site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond., as it set out within the allocation supporting text. Further detail on the site's proposed access arrangements is contained within the allocation topic paper [10.05.34, chapter 10] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11,]. As such, it is considered that appropriate evidence and policy requirements have been provided to alleviate traffic and access issues with development of the site. No changes are considered necessary..</p>	
JPA14.33	<p>Concerns raised about access points (particularly Cop Road, Meek Street, Broadbent Road, Sumner Street and Whetstone Road).</p> <p>The sites identified are devoid of good vehicular access and there is no obvious way to make the necessary improvements. If Bullcote Lane is closed it will make residents of Moorside stranded as this lane is used for school children and workers.</p>	<p>Criterion 5 of Policy JPA14 Broadbent Moss requires development on the site to provide for appropriate access points to and from the site in liaison with the local highway authority. The main points of access to the site will be via Vulcan Street and the new connections to Shaw and Oldham via the Beal Valley allocation, linking to a new internal spine road that will be delivered as part of the comprehensive development of the site. The spine road will provide a link to the residential area to the east of the Metrolink line, through delivering an appropriate crossing.</p> <p>Furthermore, the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] and Transport Locality Assessment Addendum – Oldham [09.01.23] have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As such, it is considered that appropriate evidence and policy requirements have been provided to alleviate traffic and access issues with development of the site. No changes are considered necessary.</p>	See Appendix
JPA14.34	<p>Residents have raised concerns whether metrolink provision would be adequate given the number of homes proposed across this area.</p>	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent</p>	See Appendix

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	<p>Plans to build a new Metrolink stop are integral to the Broadbent Moss development and these must be hardwired into the development plans at the earliest opportunity in order for the development to reach its full potential. The Metrolink and connectivity is key to the successful delivery of this site, and that funding either through TFGM or through developer contributions.</p>	<p>Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. Paragraph 15.1.2 of the Locality Assessment also states that the introduction of the Metrolink stop is expected to contribute to resolving the general issue regarding congestion on the surrounding road corridors, specifically Oldham Road, as this is the main thoroughfare into the centre of Oldham as well as supporting access to the allocation by sustainable means.</p> <p>Potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer.</p> <p>Reflecting this criterion 7 of Policy JPA14 Broadbent Moss requires any development to contribute towards the delivery of a new Metrolink stop and park and ride facility, along with the Beal Valley allocation, which in part will help to serve both allocations and improve their accessibility and connectivity. The proposed Metrolink stop and Park and Ride is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.35	<p>An overbridge may be required over the spine road to cross the proposed Metrolink line, which would require additional funding. Question if sufficient funding can be sought to accommodate this infrastructure, which is required to make the site acceptable and reduce congestion. As such, detailed costings need to be set out at this initial stage to ensure all infrastructure can be delivered on site, whilst providing market and affordable housing and ensuring the site is viable.</p>	<p>With regards to the overbridge specifically criterion 5 of Policy JPA14 Broadbent Moss sets out that the proposed spine road, linking this allocation to that at Beal Valley, should also provide a link to the residential area to the east of the Metrolink line, through delivering an appropriate crossing to form an east-west connection. Paragraph 11.158 of the Plan goes on to say that at least one crossing point over the Metrolink line will be required to connect the eastern and western parts of the site.</p>	PD Northern Trust Asset Management

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		<p>This has been considered as part of the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] and Transport Locality Assessment Addendum – Oldham [09.01.23]. Paragraph 15.1.4 of the Locality Assessment concludes that depending upon design and arrangement, the above spine road may require a standard width road crossing over the proposed Metrolink line where a level crossing would be deemed unsuitable. The proposed spine road is identified in the Five-Year Transport Delivery Plan 2021-2026 [09.01.02] with the aim to complete a business case for its early delivery (see Map 2).</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.36	Understand a new internal spine road will be developed but constituents have still raised concerns on the impact on arterial roads.	<p>The Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] and Transport Locality Assessment Addendum – Oldham [09.01.23] have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking) (see Table 12, page C40 and C41).</p> <p>Reflecting the findings of the Locality Assessment criterion 6 of Policy JPA14 Broadbent Moss also requires development to take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary..</p>	Debbie Abrahams MP

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JPA14.37	Enhancements would be required to facilitate access to the Shaw Metrolink stop and an appropriate crossing across the line, along with enhanced links to the west and east, and to the Beal Valley allocation (ref JP 12 – immediately to the north).	The need to enhance links and improve connectivity between the Beal Valley and Broadbent Moss allocations is reflected Policy JPA14 Broadbent Moss – specifically criteria 5 to 7 and the corresponding paragraphs in the reasoned justification (11.156 to 11.158). No changes are considered necessary.	SGMGB Oldham Groups
JPA14.38	The car park at Shaw and Crompton Metrolink is already at capacity and more space is urgently needed here, therefore proposal to develop a new Metrolink stop at Cop Lane is welcomed and would urge consideration for developing other stops elsewhere on the Rochdale – Oldham Metrolink line (for example, at Dunwood Park) to improve accessibility.	The proposed Metrolink stop and associated Park and Ride facility at Cop Lane has been identified to support delivery of PfE, and specifically policies JPA12 Beal Valley and JPA14 Broadbent Moss. Any additional stops along the Rochdale – Oldham Metrolink line would need to be considered by TfGM and Oldham Council in line with the Greater Manchester Transport Strategy 2040 <a href="#">[09.01.01]</a> and Our Five Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> . No changes are considered necessary.	Cllr Howard Sykes
JPA14.39	The words 'accessible' and 'accessibility' in 'Places for Everyone' should be clearly defined, or alternative words used, so that disabled people (and urban design professionals) are clear on what is intended and what to expect from the policies in the Plan. Otherwise, these policies are unsound.	The use of words such as access, accessible and accessibility in the PfE is considered consistent with their use in planning documents such as NPPF. As appropriate, the supporting text of policies in the Plan provide clarification as to what is meant by the policy. Similarly, documents such as the National Design Guide provide clarity, dependent on the specific circumstance. It is therefore considered that appropriate clarification is either provided in the supporting text of the PfE and/or in other documents and no changes are necessary. No changes are considered necessary.	Greater Manchester Coalition of Disabled People and Manchester Disabled Peoples Access Group
	<b>Contamination / Land</b>		
JPA14.40	Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding should be on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary. No changes are considered necessary.	Mineral Products Association
JPA14.41	It is called Broadbent Moss because that is what part of it is. Moss and peat lands are carbon stores and water stores and according to policy in other sections of the PfE should not be disturbed. Why is this site being disturbed?	Site constraints have been considered through the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.10]</a> and Broadbent Moss indicative concept plan <a href="#">[10.05.09]</a> . This has informed the policy requirements set out in JPA14 Broadbent Moss, including criterion 20 regarding flood risk and use of natural sustainable drainage systems and	John Shepherd

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		<p>criterion 21 regarding the provision of a wetland catchment areas to provide net gains in flood storage for the wider catchment and / or actively reduce flood risk impacts downstream, integrating it with the wider multi-functional green infrastructure network and incorporating SUDs.</p> <p>In terms of need, The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. 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. No changes are considered necessary.</p>	
JPA14.42	<p>Concerns regarding the decontamination and remediation due to previous use.</p> <p>Due to the former landfill/quarry use it is anticipated that there is high potential for contamination and in light of the sensitivity of residential use there will be a need for robust testing and potential mitigation works. It is questionable as to whether the site should be released from the Green Belt in advance of any further investigative work being undertaken – residential use is highly sensitive and in addition, many former quarry/landfill locations are key habitat for protected ecological species and this also therefore needs further investigation in advance of any site release.</p> <p>Without further phase 1 and 2 investigations there is no clear understanding what remediation measures will be required. Given the site is only just viable, the remediation costs are likely to render the site unviable and therefore halt or prevent development coming forward on site.</p>	<p>Site constraints have been considered through the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.10]</a> and Broadbent Moss indicative concept plan <a href="#">[10.05.09]</a>. This includes contamination (see page 29 of the Concept Plan Report) and had helped to inform the developable area, site boundary and policy requirements set out in JPA14 Broadbent Moss. Policy JPA14 Broadbent Moss requires any development to incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes. Any development on the site would also be required to be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority. Costs for the preparation and enabling works, including demolition, remediation and ground preparation measures have been assumed as part of the Places for Everyone Strategic Viability Assessment (see Stage 2 Allocated Sites amendments <a href="#">[03.03.041]</a> for details.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix

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	<b>Water and Flooding</b>		
JPA14.43	<p>The area is a natural floodplain for the River Beal. Development will increase risk of flooding / contribute to large scale flooding of lower lying areas currently drained by the River Beal and put properties at risk.</p> <p>A full assessment needs to be made of the impact the building of 1400 houses will have on future flooding in this area and this assessment needs to be made available to the public.</p> <p>Building on flood plains and historic mining areas is going to make getting insurance and mortgages pretty impossible, the houses will then not be available to anyone, only those that will be able to rent them out.</p> <p>Building on the flood plain adjacent to rivers is never a good idea, as any old fool will tell you. Since the development of the flood plain in Rochdale, to build Kingsway Business Park, flooding in the Rochdale area up as far as Todmorden and Hebden Bridge has increased to a level rarely seen before in living memory.</p>	<p>A Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> has been carried out for Broadbent Moss which was split into three parcels (15a, 15b and 15c) in the SFRA level 1. An overview of flood risk and the Irwell Catchment Opportunities for each allocation parcel is provided below. A summary of the findings can be found in the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>. Parcel 15a was subject to the exceptions test as part of the SFRA Level 2 work <a href="#">[04.02.18]</a> as it was identified as forming part of a mixed-use site overall.</p> <p>Following further assessment the exceptions test was not required but it was noted that it must be proven that surface water can be controlled for the lifetime of the development in order for development to proceed. The SFRA Level 2 makes recommendations and sets out FRA requirements for parcel GM allocation 15a that should be had regard to as part of the masterplanning and planning application stages. Parcels 15b and 15c passed the sequential test with a recommendation to consider the site layout and design around flood risk. A drainage strategy for the whole allocation site and FRA is required. Further details can also be found in the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a>.</p> <p>These findings have been reflected in Policy JPA14 Broadbent Moss in criterion 20, which requires any development on the site to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, and criterion 21 with the need to provide for a wetland catchment area. Furthermore, Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment approach to protect the quantity and quality of water bodies and managing flood risk.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix

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JPA14.44	<p>The GMSF Concept report for BM (para 3.2.2) quotes the Environment Agency stating a 'medium to high probability' of flooding surrounding the River Beal. The IPPC report (2021) on Climate Emergency means 1450 houses, in a valley is 'unsound' and will NOT make it 'more resilient to climate change' (PfE 4.1) . In the Current Climate Emergency of such fragility for our planet, it is our moral duty to protect and preserve all.</p>	<p>Policy JPA14 Broadbent Moss have been informed by the preparation of a Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> . A summary of the findings can be found in the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
	<b>Infrastructure</b>		
JPA14.45	<p>General concerns regarding lack of infrastructure and the impact on existing. Insufficient infrastructure to accommodate such a massive build on this area of greenbelt.</p> <p>The additional demands these thousands of new residents will place will simply overwhelm our already creaking local infrastructure, which is inadequate even for our existing population. Proposed development would place further strain and intolerable stress on schools, GP's, dentist and Royal Oldham hospital which are already at capacity.</p> <p>Not only will this adversely affect the immediate are, but also put a further strain on already stretched services locally, and in nearby Royton.</p> <p>The Places for Everyone plan does not appear to adequately allocate further funding to deliver on these requirements. How supporting infrastructure will be provided is not adequately explained in the plan. It's weak and unconvincing. Full assessment needs to be made of the impact that will be made upon the current infrastructure and services.</p>	<p>Paragraph 11.159 of JPA14 Broadbent Moss recognises the importance of ensuring that any development proposed does not place undue pressure on existing infrastructure and that account is taken of the increased demand it may place on existing provision. As such therefore a number of criteria included in JPA14 that seek to ensure appropriate infrastructure is provided.</p> <p>Furthermore, there are also a number of policies in the <a href="#">Publication Plan</a> that seek to address this matter, such as policies JP-G6 Urban Green Space; JP-P5 Education, Skills and Knowledge; and JP-P6 Health; JP-P7 Sport and Recreation. Supporting these are the overarching policies of Policy JP-P1 Sustainable Places, which sets out key attributes that all development, wherever appropriate, should be consistent with including being supported by critical infrastructure, such as energy, water and drainage and green spaces; and Policy JP-D2 on Developer Contributions.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	See Appendix
	<b>Legal / compliance</b>		
JPA14.46	<p>The people of Greater Manchester will lose all faith in our so called "representative" leadership as this goes against all that we though our councils stood for.</p>	<p>Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a>. Details of the process can be found at paragraphs 1.59 to 1.68 of the <a href="#">Publication Plan</a> and the introductory chapter (pages 4 to 6) of the Broadbent Moss</p>	See Appendix

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	<p>This process is being driven by greed and corrupt politicians. Not following the wishes of the current residents.</p> <p>It is pandering to the planners and developers and will not benefit the local community in the slightest.</p> <p>How can so few people make such huge decisions for so many people without proper consultation?</p>	<p>Allocation Topic Paper <a href="#">[10.05.34]</a>. No change to the policy is considered necessary.</p>	
JPA14.47	<p>Paragraph 3.1 of PfE says 'all voices must be heard' yet Covid-19 and a general lack of consultation means key groups (mainly, but not exclusively) those without Internet) have not been given an opportunity to have their say (Equality Act, 2010).</p> <p>To be compliant with the Discrimination and Equality Act 2010, we would require OMBC to at least have written to every household in the Borough, informing residents of the process in writing (This is well within the scope of the consultation and the capabilities of the Council who produce a quarterly newsletter which is distributed to every home in the Borough).</p>	<p>Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a>. Further details can be found in Oldham Council's SCI Statement of Compliance. An <a href="#">Equalities Impact Assessment</a> has been undertaken of the SCI. No change to the policy is considered necessary.</p>	See Appendix
JPA14.48	<p>Objections received to the lack of consultation with the view that proposals are unsound and not legally compliant given that this is not the GMSF and is 'substantively different' following Stockport's removal, and as such needs much wider consultation. Concerns raised regarding lack of awareness regarding proposals. No advertisement / minimal signage of the plans, as such views of the people who will be mostly affected have not been sought. Consultation should include the informed views of local residents. This can only happen if local residents are clearly informed of the plans and are then given the opportunity to respond in a way that is easily accessible and inclusive. Land is between two deprived areas and there is little professional opposition. All findings related to assessments of the site should be available at public venues to be viewed and discussed by local residents. Modification requested to carry out further consultation to increase awareness and provide a chance for people to voice their objections. A form should have gone out to the local people. Found out by chance via a post on Facebook. Consultation feels underhanded and that plans are trying to be finalised before any real</p>	<p>Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a>. Further details can be found in Oldham Council's SCI Statement of Compliance. No change to the policy is considered necessary.</p>	See Appendix

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	objections can be made with the majority of local residents being unaware of the proposals.		
JPA14.49	A part of this site should by now be an 18-hole public golf course with club house. The full story of what has gone on here needs uncovering. Two farms and biodiversity have already been lost to a smoke and mirrors venture by the council - a so called golf course that never got built, but they got plenty of money from tipping 1994 to 2015 hundreds of waggons a day polluting the roads of Oldham. Destruction of green spaces is contrary for an original plan 25 years ago to develop the space for the use of the community.	Not relevant to Places for Everyone. The Plan is based on robust and proportionate evidence. No change considered necessary.	See Appendix
JPA14.50	PfE is inconsistent with national policy (NPPF, 2019 (d).) Proposal undermines para 13 of Policy JP Allocation 14 and Decision-Making clause of NPPF (para. 43) also, Maintaining effective cooperation clause.	No change is considered necessary. Policy JPA14 Broadbent Moss is considered to be consistent with NPPF and provides an appropriate strategy to contribute to local housing need and diversify the existing housing stock in the area, boroughwide and across the nine districts which is a key objective of the Plan and NPPF.	See Appendix
JPA14.51	The use of jargon and making the wording of the plans so confusing is not legally acceptable. Nor is making the objection process so lengthy and complicated.	Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a> .	Nicola Pitman
JPA14.52	There are 2.7 million adults in the UK (ONS Figures) that do not have access to the internet and this should have been taken into consideration. This is also is higher in Oldham, simply because of the demographic of the area, particularly in Shaw which has a high population of elderly residents.	Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a> . Further details can be found in Oldham Council's SCI Statement of Compliance. No change to the policy is considered necessary.	Save Shaw's Green Belt
	<b>Health and Well-Being</b>		
JPA14.53	The land backs onto quite deprived areas. Green spaces are important for addressing Oldham's mental health for local residents and child obesity issues. Removing an asset that the local people enjoy with consideration local people and the stress.	As set out in chapter 23 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> the Integrated Assessment <a href="#">[02.01.02, 02.01.04, 02.01.05]</a> has incorporated a Health Impact Assessment. Broadbent Moss scored very positively against supporting healthier lifestyles and supporting improvements in determinants of health. This is due to the policy including delivering multi-functional green infrastructure, enhanced linkages to the countryside, enhanced biodiversity and new or improved open space provision.	See Appendix

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		<p>Furthermore, Policy J-P6 Health states that to help health inequality new development will be required, as far as practicable, to:</p> <ul style="list-style-type: none"> <li>• Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;</li> <li>• Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice; and</li> <li>• Be supported by a Health Impact Assessment for all developments which require an Environmental Impact Assessment, and other proposals where the local planning authority considers it appropriate.</li> </ul> <p>No changes are considered necessary.</p>	
	<b>Wildlife / Natural Environment</b>		
JPA14.54	<p>Loss of habitat and biodiversity would destroy wildlife habitat. The area is habitat / haven for an abundance of wildlife, flora and fauna. Reference made to bats, badgers, foxes, roe deer, hedgehogs, owls, ground-nesting birds, lapwings and amphibians. Stream running through. Wildlife is part of what makes it so beautiful. Building houses will ruin it.</p>	<p>Chapter 18 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> considers ecology and biodiversity. The conclusions from the Preliminary Ecological Appraisal <a href="#">[10.05.12]</a> pages 22 to 23] , carried out by GMEU in 2020, are summarised at paragraph 18.4 of the topic paper. The appraisal found that there is nothing so substantive as to rule out the site from allocation, although woodland, wet grassland and ponds would need to be retained and/or compensated for if lost. Criteria 13, 14 and 15 of JPA14 Broadbent Moss set out the policy requirements in relation to habitats and biodiversity, including the requirement for extended Phase 1 habitat survey, badger, amphibian and bat surveys at the planning application stage. See the full allocation policy and reasoned justification for further detail.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	See Appendix
JPA14.55	<p>Comments regarding protection and enhancement of wildlife / biodiversity. Trying to bring back nature into our urban areas as part of our efforts to tackle global warming and diversify our wildlife.</p>	<p>A large proportion of the site is to remain undeveloped and will be retained as Green Belt, providing an opportunity to significantly enhance the green infrastructure and biodiversity value of the site, enhancing the existing assets (such as the priority habitats)</p>	See Appendix

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	<p>Wildlife should be protected. Our environment is so fragile and such a large-scale development would be catastrophic for our wildlife and open space, it is our moral duty to protect and preserve all wildlife and open spaces for future generations. We should be looking to preserve these areas, not destroy them. This area should be a country park.</p> <p>Wildlife and woodland, ponds and wet grassland should be protected. This is stated in the Preliminary Ecological Analysis (2020, p22) they would need to be retained or compensated if lost. PfE does not state how this will be done.</p>	<p>and improving access to the open countryside for the local community. Policy requirements regarding biodiversity, Habitat Regulation Assessment, further surveys and habitats along with River Beal are set out in criteria 13, 14 and 15 of JPA14 Broadbent Moss.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.56	<p>Due to the close proximity of site allocations JPA 14 and JPA12 on which, biodiversity and subsequent wildlife amalgamate, this plan is not "sound" (para. 35 NPPF). Treating the two sites separately for biodiversity and wildlife, is a failure to adhere to (para 24 NPPF), therefore ceases to qualify as Positively Prepared (para 35 a) NPPF). Like any ecosystem they rely on each other, so by taking one away it affects the other, so they need to be treated as one.</p>	<p>Paragraphs 11.162 and 11.163 of JPA14 Broadbent Moss highlight the inter-relationship and connectivity between the allocations at Broadbent Moss and Beal Valley, stating that together they provide the opportunity to secure net gains for nature and local communities. The development of the two site allocations should include elements of partnership work with appropriate bodies, to ensure they contribute towards a wider ecological network approach and provide an opportunity to demonstrate an exemplar development using green infrastructure, that can be designed in such a way that it can support local biodiversity and strengthen coherent ecological networks beyond the site boundary, creating a resilient landscape through a network of connected sites. No changes are considered necessary.</p>	See Appendix
JPA14.57	<p>The Preliminary Ecological Appraisals for both sites are inadequate and flawed; they failed to include numerous protected and endangered species that currently inhabit these two sites, which prevents further and more in-depth investigations and analysis from taking place. Without a much more detailed and accurate ecological analysis the development and disruption on such a large scale on would have devastating consequences for the wildlife.</p> <p>An in depth ecological and biodiversity analysis of this site allocation is required, carried out by recognised, impartial wildlife trusts. That are more focussed on the "value" of our wildlife and not analysing this area from a desk somewhere.</p>	<p>The Preliminary Ecological Appraisal <a href="#">[10.05.12]</a> prepared to inform JPA14 Broadbent Moss was carried out by Greater Manchester Ecology Unity (GMEU) in 2020. Chapter 2 sets out the legislative and planning context (pages 5 to 9) whilst chapter 3 (pages 10 to 11) sets out the methodology. A Habitat Regulation Assessment (HRA) was also carried out to appraise the GMSF and PfE, by GMEU. A summary of the findings of the HRA can be found at chapter 19 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a>.</p> <p>Criterion 14 of JPA14 Broadbent Moss requires development on the site to have regard to the recommendations of the Habitat Regulations Assessment and provide further surveys on phase 1 habitats, badgers,</p>	See Appendix

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	<p>Decisions should not be made on a short-term basis but should consider the long-term impact upon the environment and the legacy of future generations. These further assessments should be a prerequisite for any release of land from the Green Belt if the purpose of such release is to facilitate development.</p>	<p>amphibians (including great crested newts) and bat surveys to inform any planning application.</p> <p>It is considered that a sufficient evidence base has been prepared to support allocation through the Plan, with further evidence required at planning application stage as detailed in the allocation policy. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.57	<p>These pfE proposals for Broadbent Moss are unsound as they do not meet do not take into account the wildlife and its habitat needs (NPPF,35d) and would destroy the areas character.</p>	<p>It is considered that a proportionate evidence base has been provided to support the policy. See row JPA14.57 regarding Preliminary Ecology Appraisal and Habitat Regulation Assessment carried out to inform preparation of the Plan and JPA14 Broadbent Moss. See row JPA14.55 regarding the criteria that have been included within the policy in relation to retaining and enhancing areas of biodiversity and the requirement for further surveys. 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>	Maria Rowland
JPA14.58	<p>The Preliminary Ecological Analysis 2020 p.22 for this area refers to the need to retain woodland, wet grassland and ponds - no definitive commitment is made in the PfE to how this will be done or even that it will be done. There are ecological issues that are as yet to be fully addressed, including replacement of Green Infrastructure to ensure important ecological features are retained, such as woodland, or where loss is required, mitigated properly.</p>	<p>It is considered that a proportionate evidence base has been provided to support the policy. See row JPA14.57 regarding Preliminary Ecology Appraisal and Habitat Regulation Assessment carried out to inform preparation of the Plan and JPA14 Broadbent Moss. Criterion 13, 14, and 15 of JPA14 Broadbent Moss set out how any development on the site will be required to retain and enhance biodiversity, have regard to the recommendations of the Habitat Regulations Assessment and provide further surveys, and protect and enhance the habitats and corridor along the River Beal.</p> <p>Furthermore criterion 21 of JPA14 Broadbent Moss requires development on the site to include provision for a wetland catchment area, to provide net gains in flood storage for the wider catchment and / or actively reduce flood</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>risk impacts downstream through additional storage, integrating it with the wider multi-functional green infrastructure network and incorporating SUDs.</p> <p>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 considered necessary.</p>	
JPA14.59	Important for the education of children to be able to see owls, deer, badgers, foxes, birds of prey and experience such open spaces.	JPA14 Broadbent Moss includes a number of criteria relating to the retention and enhancement of biodiversity, green infrastructure and open space. No change is considered necessary.	Terry Millett
JPA14.60	What will happen to the wildlife and trees once construction has commenced / development taken place. Clarity will be needed to show the wildlife will be safely relocated to a similar environment.	JPA14 Broadbent Moss includes a number of criteria relating to the retention and enhancement of biodiversity, green infrastructure and open space. Criterion 1 also requires any development on the site be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority. No change is considered necessary.	See Appendix
JPA14.61	Previous landfilling has resulted in a site of biological importance being poisoned and removed from the register (adjacent Royton Moss).	Not relevant to Places for Everyone. The Plan is based on robust and proportionate evidence. No change is considered necessary.	Tracy Wright
JPA14.62	<p>The Wildlife Trust for Lancashire, Manchester &amp; North Merseyside recommends that the allocation be considered unsound for a number of reasons:</p> <p>The identification of a number of ecological features on the site (such as wet marshy grasslands, broadleaved woodland and ponds) – Support recommendation from the Preliminary Ecological Assessment for these habitats would need to be retained and/or compensated for if lost. The Trust supports this recommendation and note policy to retain and enhance areas of biodiversity within the site.</p> <p>High-level indicative concept plan report recommends, where possible, the retention of existing water features and ponds and enhancement measures to be put in place – welcomed, but where not possible compensatory habitat would need to be provided that links in with existing ecological assets and connects to the wider ecological networks.</p>	<p>It is considered that a proportionate evidence base has been provided to support the policy. The policy has been informed by the Preliminary Ecology Appraisal <a href="#">[10.05.12]</a> and Habitat Regulation Assessment <a href="#">[02.02.01]</a> with the inclusion of criteria seeking the retention and enhancement of biodiversity and the requirement for further surveys on phase 1 habitats, badgers, amphibians (including great crested newts) and bat surveys to inform any planning application.</p> <p>Paragraphs 11.162 and 11.163 of JPA14 Broadbent Moss which highlight the inter-relationship and connectivity between the allocations at Broadbent Moss and Beal Valley, particularly in relation to green infrastructure and biodiversity.</p>	The Wildlife Trust

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	<p>Concept plan identifies that the existing hedgerows have ecological value for local wildlife and where possible should be retained and enhanced - where this is demonstrably not feasible, new habitat needs to be created to maintain existing and creation of new corridors. Any loss of hedgerow habitat would have to be replaced and show a 10% BNG.</p> <p>Welcome policy to protect and enhance the habitats and corridor along the River Beal and to demonstrate an exemplar development using green infrastructure - Broadbent Moss and Beal Valley are contiguous and the cumulative effects of the two developments on ecological assets need to be taken into account and mitigated/compensated for.</p> <p>Note recommendation from preliminary ecological assessment.</p> <p>Farmland bird surveys should also be required.</p>	<p>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 considered necessary.</p>	
	<b>Landscape</b>		
JPA14.63	<p>Recognise that houses must be built in Oldham to meet our housing need, however my support for this proposal is conditional on the basis that the valley is kept as clear as possible so that the view from Bullcote Park is not materially impacted by the development – this would of course have an impact on the number homes that could be built on the site, but it is important in my view to ensure that we protect our natural assets where possible.</p>	<p>Criteria 10 and 11 of JPA14 Broadbent Moss require development on the site to:</p> <p>Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. A Landscape Appraisal is required to inform any planning application;</p> <p>Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.</p> <p>Chapter 17 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> summarises the evidence from the Landscape Character Assessment (2018) in relation to the allocation and the recommended mitigation measures.</p> <p>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 considered necessary.</p>	Jim McMahon MP
JPA14.64	<p>Broadbent Moss falls within the Rochdale and Oldham South Pennines Foothills landscape character area and the Pennine Foothills South/ West</p>	<p>Chapter 17 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> summarises the evidence from the Landscape Character Assessment (2018) in relation to</p>	SGMGB Oldham Groups

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	Pennine landscape character type as identified within the Landscape Character Assessment, with any development likely to have a medium to high impact on this character and substantial mitigation required.	the allocation and the recommended mitigation measures. In response, criterion 19 of JPA14 requires any development to have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines.  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 considered necessary.	
	<b>Green Infrastructure</b>		
JPA14.65	General objections to loss of green space. The proposals would lead to a loss of accessible open space used by local residents (children and adults) for informal recreation and enjoyment of semi-wild places. The designated sites are notably attractive open spaces that provide pleasure, relaxation, and health benefits to residents and visitors. Oldham doesn't have a lot going for it and this council seems determined to destroy its natural beauty areas. A whole valley of Green Belt and its natural beauty will disappear. A concrete jungle is not acceptable to residents.	Policy JPA14 Broadbent Moss includes a number of criteria in relation to open space and green infrastructure – 9, 12 and 16.  Furthermore, policy JP-G2 Green Infrastructure Network sets out a strategic approach for the protection, management and enhancement of our Green Infrastructure. It states that wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network in accordance with the priorities identified. The Plan also includes policies JP-G6 Urban Green Space, JP-G8 Standards for Greener Places and JP-P7 Sport and Recreation.  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 considered necessary.	See Appendix
JPA14.66	Develop the green space for use of the community, nature reserve, outdoor sports and activities, woodland to contribute the carbon footprint.	As set out in Policy JPA14 Broadbent Moss and explained in paragraph 11.161 a large proportion of the site is proposed to remain undeveloped and will be retained as Green Belt, providing an opportunity to significantly enhance the green infrastructure and biodiversity value of the site, enhancing the existing assets (such as the priority habitats) and improving access to the open countryside for the local community. It is considered that the Beal Valley and Broadbent Moss strategic allocations provide opportunities to secure net gains for nature	Andrew Mossop

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		and local communities, and to demonstrate an exemplar development using green infrastructure. No change is considered necessary.	
JPA14.67	<p>Detrimental by means of the loss of long-standing Rights of Way currently affording access to the area.</p> <p>The sites include public footpaths enjoyed by many dog-walkers, ramblers, and walking groups. Many of the Public Rights of Way are integral to the historic Shaw and Crompton Beating of the Bounds walk and Crompton Circuit walks.</p> <p>These locations also provide one of the few opportunities for people to undertake horse riding in safety which is particularly valued by young and inexperienced riders.</p>	<p>Criterion 9 of Policy JPA14 Broadbent Moss requires development on the site to enhance pedestrian and cycling links to and from the site to the new Metrolink stop, the Beal Valley strategic allocation, bus network and surrounding area, to encourage sustainable modes of travel and maximise the sites accessibility. This should be delivered as part of a multi-functional green infrastructure network (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas to minimise the visual impact on the wider landscape, mitigate its environmental impacts, enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.</p> <p>Furthermore, Policy JP-C1 An Integrated Network seeks to ensure that development and transport investment fully considers the needs of all people and those modes which make most efficient and sustainable use of limited road space, by following the Global Street Design Guide (125) hierarchy (highest priority first). Commencing with pedestrians and followed by cyclists. Finally, Policy JP-2 Green Infrastructure Network sets out a strategic approach will be taken to the protection, management and enhancement of our Green Infrastructure, recognising its multi-functional benefits, including outdoor recreation and access. No change is considered necessary.</p>	See Appendix
JPA14.68	<p>Should be no pre-emptive removal of OPOL designation of OPOL9, OPOL10 and OPOL22. Since both OPOL10 (Shawside) and OPOL22 (Cowlshaw) both meet the criteria for Local Green Space (LGS), then they should be awarded the designation if these allocations are ultimately removed from the GMSF/PFE, given that the decision not to designate them as LGS is contingent on their allocation.</p> <p>All OPOL (Other Protected Open Land) should kept free from development.</p>	As with land within the Green Belt that is proposed for release as part of an allocation, land designated as Other Protected Open Land (in Oldham Council's Joint Core Strategy and Development Management Development Plan Document) would remain designated as such until it has been de-designated through Places for Everyone or the Oldham Local Plan. Until such a time it will continue to be protected in line the Policy 21 of Oldham's Core Strategy. No change is considered necessary.	Appendix

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	<b>Utility infrastructure / drainage</b>		
JPA14.69	Concerns raised regarding drainage and sewerage issues, impact on River Beal and sites further down the river. Area is full of springs and boggy. Limited infrastructure within the site, with only peripheral water and sewage provision. The dissection of the site with the metrolink means that a comprehensive utilities provision for the whole site would not be practicable.	<p>A Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> has been carried out to inform the PfE and the proposed strategic allocations, including Broadbent Moss. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording. This has informed criterion 20 of Policy JPA14 Broadbent Moss, requiring an appropriate flood risk assessment, comprehensive drainage strategy and the integration of natural sustainable drainage systems as part of the multi-functional green infrastructure network.</p> <p>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 considered necessary.</p>	See Appendix
JPA14.70	Wording amendments are suggested to the criteria on flood risk assessment (JPA14 (19)) including surface water management and using natural flood management and highways SUDs.	The findings from the Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> have informed the policy requirements set out in JPA14 Broadbent Moss. Criterion 20 of policy JPA14 sets out that development of the site is required to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. It also goes on to say that natural sustainable drainage systems should be integrated as part of the multi-functional green infrastructure network and highway SUD's features explored. Further guidance is then also provided in paragraph 11.168 of the <a href="#">Publication Plan</a> . Furthermore, Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment approach to protect the quantity and quality of water bodies and managing flood risk, which developments would need to have regard to where relevant. No changes are considered necessary.	United Utilities Group PLC
JPA14.71	Suggested an additional criterion around meeting National Housing Standard for water consumption.	Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies and managing flood risk, which includes a criterion on conserving water and maximising water efficiency in new development. The Plan needs to be read as a whole and no changes are considered necessary.	United Utilities Group PLC

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JPA14.72	Additional criterion requested regarding taking into account the Groundwater Source Protection Zone in the design of the development and compliance with the Environment Agency's approach to groundwater protection. Appropriate risk assessments of the impact on the groundwater environment and public water supply should be required.	Criterion 20 of policy JPA14 sets out that development of the site is required to have regard to the Groundwater Source Protection Zone in the design of the development, to ensure that there are no adverse impacts to groundwater resources or groundwater quality, and to ensure compliance with the Environment Agency approach to groundwater protection and any relevant position statements. A detailed hydrological assessment should support any planning application within this zone. Further information is provided at paragraph 11.169 of the reasoned justification. changes are considered necessary.	United Utilities Group PLC
JPA14.73	The net developable area will be impacted on by need for ecological and flood risk mitigation – this should have been considered in advance of setting an indication of predicted residential unit yield. The site is in a groundwater source protection zone and the extent of any development needs to account for this.	Section 3 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> sets out details of the site. The gross site area measures around 82 hectares (ha), with the developable area measuring around 48ha. This has been informed by site constraints, including topography, ecology and flood risk. Details can be found in the Broadbent Moss and Beal Valley Indicative Concept Plan Report <a href="#">[10.05.10]</a> and Broadbent Moss indicative concept plan <a href="#">[10.05.09]</a> .  It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	SGMGB Oldham Groups
	<b>Historic Environment</b>		
JPA14.74	No LB's, SAMs or CAs on the site although there are a number in close proximity that may be impacted by development within their setting.	The initial Historic Environment Assessment Screening Report 2019 <a href="#">[08.01.01]</a> prepared by the Centre for Applied Archaeology, recommended that Broadbent Moss is screened in for further assessment. It identified that whilst there are no designated sites within the land allocation, a number have been identified nearby which require further assessment. As summarised in Chapter 20 of the Broadbent Moss Topic Paper <a href="#">[10.05.34]</a> to address the screening report recommendations Oldham Council prepared a Historic Environment Assessment (HEA). In terms of Broadbent Moss, the assessment concluded that, although there are number of assets outside of the allocation the proposed site does not make any contribution to their significance. Recommended harm mitigation was that reference should be made to the recommendations of the Greater Manchester	SGMGB Oldham Groups

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		<p>Landscape Character and Sensitivity assessment and ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.</p> <p>As such Policy JPA14 requires development of the site to have regard to the recommendation of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. Criterion 19 of Policy JPA14 also requires development on the site to be informed by the findings and recommendations of the Historic Environment Assessment. changes are considered necessary.</p>	
JPA14.75	<p>There is potential for archaeological remains within the moss areas but not the larger former landfill site, particularly from the Prehistoric, Post-Medieval and Industrial periods, therefore further archaeological work is recommended.</p>	<p>The initial Historic Environment Assessment Screening Report 2019 [08.01.01] concluded that there is potential for archaeological remains, however this is limited to the former mosses, small areas around the river Beal and the sites of former collieries and Broadbent settlement, recognising that the landfill site will have had a significant impact on any archaeological remains. Reflecting this, criterion 19 of Policy JPA14 Broadbent Moss states that an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.</p> <p>Furthermore, Policy JP-P2 Heritage states that development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.</p> <p>No changes are considered necessary.</p>	SGMGB Oldham Groups
	<b>Viability</b>		
JPA14.76	<p>Comments made regarding the viability and deliverability of the site.</p>	<p>A strategic viability assessment [03.03.01, 03.03.02, 03.03.03 and 03.03.04] has been published alongside the PfE Plan. In relation to the site,</p>	See Appendix

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	<p>There are significant contamination and ground condition issues and costs associated with this site within most of the perceived developable area. There are known access issues and the site is technically challenging, with more development likely to go beyond plan period due to the technical constraints. Question conclusions of the Three Dragons viability assessment. evidence base questions.</p> <p>Factors including the overall net developable area and the likely high abnormals associated with the constraints would significantly influence the deliverability of any development. Site is also in multiple ownership. Question if detailed costings have been carried out to factor in all the transport infrastructure required.</p>	<p>the viability assessment concluded that despite the viability testing result showing the allocation to be only marginally viable, it is considered that the allocation provides significant opportunity, especially when paired with the adjacent Beal Valley allocation, to create a new community in an attractive location with supporting infrastructure, including a new Metrolink stop and Park and Ride facility, and local centre, that will also benefit the wider community and contribute to serving existing issues. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. As such, it is considered that an appropriate evidence base has been prepared to support the plan and the site selection process.</p> <p>The allocation topic paper <a href="#">[10.05.34]</a> provides a full summary of the background work and evidence undertaken to inform and support the allocation. Supporting documents also include a high-level indicative concept plan and report <a href="#">[10.05.09]</a> and <a href="#">[10.05.10]</a> for the allocation.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.77	<p>There are concerns with the deliverability of this site and would recommend the allocation of additional sites to act as a buffer should this site not come forward within the plan period or there are significant delays in bringing the site forward. We consider a 30% reduction (549 dwelling) should be built into the supply assessment from these sites (including Broadbent Moss).</p>	<p>It is considered that an appropriate evidence base has been prepared to support the allocation. Evidence in relation to the site selection process is set out within the the Site Selection Background Paper <a href="#">[03.04.01]</a>. It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	PD Northern Trust Asset Management
	<b>General Objections</b>		
JPA14.78	Policy unsound - no specific comments provided.	Noted	See Appendix
JPA14.79	Comments requesting that the allocation be removed from the Plan.	The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. The PfE Plan sets	See Appendix

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	<p>Request that this allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town centres and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework.</p>	<p>out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF.</p> <p>However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land.</p> <p>The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>Section 14 of the Broadbent Moss Allocation Topic Paper <a href="#">10.05.34</a> 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 <a href="#">07.01.25</a>.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.</p>	
JPA14.80	Unsustainable.	<p>Policy JP-S1 Sustainable Development sets out specific policies to achieve sustainable development, including measures in relation to supporting infrastructure and biodiversity [see pages 82-83 of the Publication Plan for the full policy].</p> <p>The site is in a sustainable and accessible location, on the edge of a large area of open land. It is located near to existing neighbouring residential communities and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this and the Beal Valley site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond. See allocation Policy</p>	Vicky Harper

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		JPA14 Broadbent Moss, [publication plan, paragraph 11.156]. No policy changes are considered necessary.	
JPA14.81	The area is no longer what the people who live here want. It no longer provides the open space that was once enjoyed here. How is building another 1000+ homes making it a place for everyone? There is already a growing lack of diversity in the community as people feel pushed out.	<p>See row JPA14.65 for a response to the loss of open space.</p> <p>As outlined in Chapter 9 'Places for People (paragraphs 9.1 to 9.4) the Plan has an important role in helping to address these inequalities and disadvantages, with the key aim must be to enable the full potential of every person and every place to be realised, with them being able to both contribute to, and benefit from, the successes of Greater Manchester. As outlined in paragraph 9.4 this Plan promotes greater inclusion in a wide variety of ways, including:</p> <ul style="list-style-type: none"> <li>Delivering sustainable places that can meet the needs of all sections of communities, both now and in the future; and</li> <li>Significantly increasing the supply of new housing that helps to meet the wide variety of needs at a price people can afford.</li> </ul> <p>No changes are considered necessary.</p>	Nicola Pitman
JPA14.82	A significant number of the proposed site allocations are unjustified and not well located – they are unsustainable and should not be promoted. Issues and constraints listed including impact on the highway, flood risk, access to services, facilities and public transport, impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. The proposed allocations should be reassessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed removed. Request that the Plan ensure the delivery of the right homes in the right places and deletion of inappropriate and undeliverable sites from the Plan	The strategic case and the detailed case for each strategic allocation is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary <a href="#">[07.01.25]</a> . The Site Selection Background Paper <a href="#">[03.04.01]</a> provides information on the methodology for selecting the strategic allocations/ growth areas. Detail on the site's selection is contained within the Broadbent Moss Topic Paper <a href="#">[10.05.34, chapter 5]</a> . Policy JPA14 seeks to mitigate the impact on various factors – such as the impact of associated traffic on the local highway; delivery of meaningful and measurable net gain in biodiversity; the contribution towards green infrastructure enhancement opportunities in the surrounding Green Belt; ensuring that any development proposed does not place undue pressure on existing social infrastructure; and requiring an appropriate flood risk assessment and a comprehensive drainage strategy.	Save Shaw's Green Belt

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		With the above and when the plan is read as whole, it is considered that this is sufficiently robust and proportionate evidence to support the Plan and no changes are considered necessary.	
JPA14.83	Insufficient consideration has been paid within the Plan to the long-term impacts of Covid, both on the economy and on human behaviours. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, it's High Streets and general housing and employment land requirements.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a> .  It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	Save Shaw's Green Belt
JPA14.84	Look at all the other much better located greenfield sites that were put forward in the call for sites process, sites that do not have these issues.	The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">[07.01.25]</a> .  It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	John Shepherd
	<b>Pollution</b>		
JPA14.85	General concerns regarding increase in pollution. Concerns regarding air pollution / pollution and emissions issues have not been taken into consideration, and the damage to peoples health. The resultant pollution/congestion will kill; carbon neutrality unobtainable - this will increase emissions in an era of Climate Catastrophe as endorsed by OMBC. This is unsound as it fails to "mitigate against noise and air	Criterion 24 of Policy JPA14 Broadbent Moss states that development of the site will incorporate noise and air quality mitigation to protect the amenity of any new and existing occupiers (both residential and employment) where new residential development adjoins Higginshaw Business Employment Area and the proposed extension.	See Appendix

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	quality"(para 11.134, PfE) as the roads linking this area are already severely congested twice a day. The increase in emissions from the cars linked to the proposed 1450 houses will impact upon the health of the local residents, which includes children attending primary schools and nurseries in the area.	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. See the allocation topic paper for further detail in regards to air quality [10.05.34, chapter 21].  When read as a whole the plan is considered sufficient to deal with issues arising from air pollution. No changes are considered necessary.	
JPA14.86	Full assessment needs to be made of the impact that will be made upon air quality for those currently living in the area.	Air Quality is covered by thematic policy JP-S 6 Clean Air which sets out a range of measures to support air quality, including criterion 3 which requires applications for developments that could have an adverse impact on air quality to submit relevant air pollution data and, if approved, to make appropriate provision for future monitoring of air pollution. No changes are considered necessary.	Gaynor O-Ryan
JPA14.87	Need the area as breathing space. There are loads of trees which produce plenty of oxygen in that area for us to help breathe.	As outlined at paragraph 11.161 of JPA14 Broadbent Moss a large proportion of the site is proposed to remain undeveloped and will be retained as Green Belt, providing an opportunity to significantly enhance the green infrastructure and biodiversity value of the site, enhancing the existing assets (such as the priority habitats) and improving access to the open countryside for the local community.  Furthermore, policy JP-G 7 Trees and Woodland aims to significantly increase tree cover and protect and enhance woodland. The justification for the policy notes that trees and woodland can help mitigate noise pollution. No changes are considered necessary.	Samuel Mcconkie
	<b>Evidence</b>		
JPA14.88	Evidence Base is inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss.	Save Shaw's Green Belt
	<b>Support</b>		
JPA14.89	No comments provided. Sound boxes ticked.	Noted	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA14.90	<p>General support from the landowners / developer promoters to the allocation and Policy JPA14. In particular reference is made to:</p> <p>Commitment to work with the Council and other landowners to achieve a comprehensive development of the site with general support for policy requirements.</p> <p>Allocation already delivering housing (Land at Hebron Street – 77 dwellings by Countryside) on OPOL land, with a further application to follow shortly demonstrating deliverability of the allocation and the demand for housing in the locality.</p> <p>Illustrative masterplan prepare to show how site could be delivered and key findings evidence the sites suitability for development.</p> <p>Allocation will make a major contribution to meeting the significant future housing needs of Oldham and the wider PfE area, provide a range of house types and tenure and help to drive improvements to skills, services and economic opportunities through expansion of existing employment.</p> <p>Commitment to developing a joint access strategy for JPA12 and JPA14, in line with the policy specific requirements.</p> <p>Noted that no reference to the provision of vehicular access from the east off the A672 Ripponden Road. No evidence provided in Locality Assessment for assertion that access via Ripponden Road at the junction with Wilkes Street is not feasible due to level changes. No suggestion that this could not be overcome. In principle the provision of a Spine Road is supported, however, further consideration of the timing of the Spine Road is required to ensure that linkages into JPA14.</p> <p>Commitment to work together with the Council to identify the best location, type and mix of services to be provided at a new local centre</p> <p>Point raised that obligations at the site will need to be considered in the context of viability and other infrastructure contributions.</p> <p>Changes to policy wording sought:</p>	<p>Support is welcomed.</p> <p>With regards to viability, Policy JP-D2 Developer Contributions states that developers will be required to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. The policy sets out the circumstances in which viability assessments will be accepted. Where it is accepted that viability should be considered as part of the determination of an application, the Local Planning Authority should determine the weight to be given to a viability assessment alongside other material considerations.</p> <p>With regards to the policy change relating to the Metrolink stop: Criterion 7 of Policy JBA14 requires development to Contribute to the delivery of the new Metrolink stop and new park and ride facility as part of the neighbouring Broadbent Moss allocation, which in part will help to serve and improve the accessibility and connectivity of both allocations. This reflects the findings and recommendations of the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>. This highlights that the proposed Metrolink stop and associated park and ride are necessary to support both the Broadbent Moss and Beal Valley allocations in terms of access by sustainable means and with regards mitigating the transport impacts of the development. The Locality Assessment states that potential contributions as to the cost of delivering this scheme should be considered at the detailed planning stage, specifically whether the costs of this scheme are to be allocated to the site developer. The proposed Metrolink stop and Park and Ride is identified in the Five-Year Transport Delivery Plan 2021-2026 <a href="#">[09.01.02]</a> with the aim to complete a business case for its early delivery (see Map 2).</p> <p>With regards to the policy change relating to the Green Belt boundary:</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Support delivery of a new Metrolink stop to serve JPA12 and JPA14 including Park &amp; Ride facilities however policy wording should be adjusted to reflect that delivery will be by TfGM and is dependent upon a successful business case being accepted. Policy wording should make it clear that it seeks to 'safeguard' the land to allow for the scenario that TfGM may choose to not bring forward a new Metrolink stop.</p> <p>Supportive of creative a new defensible Green Belt boundary, however it is considered that the Green Belt boundary should be amended to reflect the proposed boundary illustrated in the Suggested Green Belt Boundary drawing submitted (ref. UG_1024_UD_DRG_GBBP_02). Justification for change provided.</p> <p>Consider that the green wedge along the banks of the River Beal and the Metrolink line would better be retained as Other Protected Open Land, (OPOL) rather than Green Belt. Justification provided.</p>	<p>Section 14 of the Broadbent Moss Allocation Topic Paper <a href="#">10.05.34</a> sets out the assessment of Green Belt for this site. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">07.01.25</a>. Site constraints have been considered through the Broadbent Moss and Beal Valley Indicative Concept Plan Report [<a href="#">10.05.10</a>] and Broadbent Moss indicative concept plan [<a href="#">10.05.09</a>]. This has informed the policy requirements set out in JPA14 Broadbent Moss and the proposed Green Belt boundary.</p> <p>With regards to the policy change relating to Other Protected Open Land: Other Protected Open Land (OPOL) is a local policy designation identified in Oldham's <a href="#">Core Strategy and Development Management Development Plan Document</a>. As such, this would be considered as part of the emerging Local Plan as appropriate.</p> <p>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>	
JPA14.91	Support the wording of this allocation.	Noted.	Historic England
JPA14.92	Supportive of the proposal to deliver 1,450 homes, however 500 homes are due to be delivered post 2037. Due to the timeframe and technical challenges relating to this allocation, there is a risk of losing affordable housing. It is therefore suggested that early delivery of affordable housing is key along with an annual review across all the strategic allocations within the Beal Valley to ensure as much affordable housing is maximised.	<p>The Housing Topic Paper includes details of the PfE Housing Land Supply. Paragraphs 6.32 to 6.39 consider the phasing of new housing development and include the PfE housing trajectory which is considered to be realistic and which will result in housing being delivered as planned over the life of the plan, including JPA14 Broadbent Moss. The Topic Paper also sets out the mechanisms through which housing growth will be achieved, capitalising on funding opportunities and priorities as they evolved. Paragraphs 6.40 to 6.77 outline the current tools and strategies in place and being developed to support this housing delivery, including the Affordable Homes Programme.</p>	Greater Manchester Housing Providers

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA14 Broadbent Moss. No changes are considered necessary.	

## PfE 2021 Policy JP Allocation 15 – Chew Brook Vale (Robert Fletchers)

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Additional Site / Viability / Delivery</b>		
JPA15.1	<p>Land at Waterside Mills should be included within the allocation to accommodate upper market housing in line with PfE. Response outlines that a representation was made to the 2016 GMSF, recommending land at Waterside Mill was included within the Robert Fletchers allocation. This was accepted and joint work progressed on the strategic site. Concept plans have been prepared taking into account access, flood risk, landscaping and wildlife to create an attractive development. The most recent PfE excludes Waterside Mill, and respondent would like Waterside Mill reconsidered. The wider Chew Brook Vale site only has two ownerships making it easy to plan and develop. Both sites are available. The site can help rebalance the housing market. Chew Brook Vale is the only strategic housing site allocation in Saddleworth. The inclusion of Waterside Mill would improve the attractiveness of the overall site and help fund access improvements and other infrastructure. Built development would be on the lower part of open land. The site is easily accessible and ideal for high value housing, whilst contributing towards affordable housing, possibly on site. Houses will follow a fabric first approach. There would be little effect on residents, businesses and without detriment to wildlife. The scheme would enable significant enhancement of wildlife habitat. Layout has been amended to address flood risk. In terms of highways SCP have looked at access and provided a simpler design. A copy can be supplied if necessary.</p>	<p>The housing methodology is covered in the Housing Topic Paper (July 2021) (06.01.03). At Chapter 6 (Paragraph 6.87) of the Housing Topic Paper [06.01.03] it is clarified that a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum.</p> <p>The Growth and Spatial Options Topic Paper [02.01.10] sets out the approach to accommodating growth within the plan area. 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.</p> <p>Robert Fletchers mill complex (Chew Brook Vale PFE allocation) comprises a derelict mill site and is currently allocated as a major developed site in the Green Belt in the Oldham Joint DPD. Its allocation will ensure that the redevelopment of a brownfield site can take place.</p> <p>In terms of land at Waterside Mill the site has been submitted and considered previously as part of the site selection process. See Call for Sites ID 1624523343005. The site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE. Site is within Area of Search OL- AS-10.</p>	Tanner Bros Limited.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>Appendix 7 of the Site Selection Paper (<a href="#">03.04.09</a>) explains that the majority of the site is greenfield land in the Green Belt. Part of site fell within the Chew Brook Vale (Robert Fletchers) proposed strategic allocation in GMSF 2019 (Policy GM Allocation 18). This part of the allocation has now been removed as part of PfE 2021 as it is not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) A change to the local housing need and plan period has resulted in some flexibility within supply to further reduce Green Belt release whilst still being able to deliver the vision, plan objectives and overall spatial strategy as well as maintaining a reasonable buffer.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA15.2	<p>Site been frustrated by site specific policies since the mill closed in 2001 and policy again risks preventing development coming forward due to abnormal costs. 90 homes will fail to unlock the site, which three dragons agree with. Flood risk is based on incomplete data and is unsound. Revised policy should link development capacity to viability and a robust understanding of technical constraints. Attachments include a review of the SFRA and finds discrepancies between modelled arrangement and information provided by client, in particular not taking into account the network of culverts. The further commissioned work in the Level 2 SFRA appears to have been carried out without the benefit of a visit, essential to the understanding of this complex site. Map of culverts, flood risk overview and preliminary cost estimate attached (ranges between £5,023,000 and £9,085,000).</p> <p>In site specific policy accept criteria 1, 6 - 15 and 18 - 20. Accept criterion 2 subject to market demand being established or public sector funding being made available to plug any viability gap. Accept criterions 16 and 17 subject to appropriate viability assessments. Object to criterion 3 - prescriptive figure</p>	<p>The site capacity has been informed by available, proportionate evidence, in this case the Level 2 SFRA Addendum (<a href="#">10.05.19</a>).</p> <p>There are flood risk issues that will need to be addressed as part of a detailed Flood Risk Assessment. The applicants can at planning application stage submit a site specific FRA that takes into account the recommendations of the Level 2 SFRA and also addresses their own points made.</p> <p>The council in reflecting on the latest flood risk evidence has taken a reasonable approach in determining the developable area and the capacity of the site to deliver new homes. This has informed the figure of around 90 homes in the PfE Policy JP Allocation 15. It is important to note that that criterion 3 states this will be 'around 90 homes' which does allow for flexibility.</p>	White Oak Limited

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>should be avoided. Criterion 4 and 11.174 accept if technical assessments demonstrate additional river crossing is required. Criterion 5 accept subject to technical assessments and funding strategy. Criterion 21 - The assumptions made within the JBA work are unreliable and must be discounted. Otherwise, provisions of item 21 are acceptable. Paragraph 11.170 is not reflected in the policy and is at odds with deliverables. 11.171 accepted subject to market demand being established or public sector funding. 11.172 accepted subject to site development capacity and viability being achieved. Peak Fringe village type would provide the required mix, response to character and would deliver around 200 units. 11.173 accepted subject to viability assessments. 11.175 - 11.180 accepted. 11.181 - FRA did not benefit from site access or material held by the landowner identifying culverts and their impact on hydrology. Assumptions made by JBA are based on incomplete material and are unreliable and must be discounted. Otherwise, provisions of policy are accepted.</p>	<p>It is not considered necessary to make any modifications regarding criteria 2, 4, 5, 16 and 17, and paragraphs 11.170-11.174.</p> <p>A strategic viability assessment (<a href="#">03.01.01 – 03.01.04</a>) has been published alongside the PfE Plan.</p> <p>PfE Policy JP-D 2 Developer Contributions We will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms.</p> <p>Likewise, technical requirements will be confirmed through a Transport Assessment.</p> <p>It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA15. No change is considered necessary.</p>	
JPA15.3	<p>There is no planning reason why the site should not have come forward in the past. It is likely it has not come forward due to viability. The site is unviable and will not deliver planning obligations. There are unresolved constraints in relation to access and flood risk. It is not clear why this unviable site has been taken forward in the site selection process and why GMCA consider that the site is likely to be delivered now.</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 <a href="#">[02.01.10]</a>. The allocation is considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective of boosting Northern Competitiveness, whilst contributing to meeting the housing need across Oldham.</p> <p>In addition, the council recognises that in supporting the redevelopment of this derelict mill site that an updated policy approach is required, which still complements and is sensitive to the surrounding area, including the PDNP.</p> <p>The Housing Topic Paper (<a href="#">06.01.03</a>) outlines the tools and strategies in place and being developed to support housing delivery. This includes a GM Delivery Team, the Housing Investment Local Fund, the Brownfield</p>	Chasten Holdings Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>Housing Fund, Getting Building Fund, Housing Infrastructure Fund, Marginal Viability Fund, Single Housing Infrastructure Fund, National Home Building Fund, Strategic Place Partnerships with Homes England and Affordable Homes Programme. The Delivering the Plan chapter of the Plan also provides further detail.</p> <p>An updated Viability Assessment was carried out for PfE 2021 (<a href="#">03.01.04</a>). The Chew Brook Vale Topic Paper (<a href="#">10.05.35</a>) summarises this (pages 66 and 67) and states the assessment also tested a scenario of 135 units, acknowledging that there may be scope to increase the residential units, if a site specific FRA at planning application stage can demonstrate a higher proportion of the site to be safe from flood risk. The viability assessment concludes that if dwellings are increased to between 135-150 the site becomes viable. Informed by site constraints Policy JP Allocation 15 proposed around 90 homes, which allows for flexibility.</p> <p>Policy JP-D 2 ‘Developer Contributions’ states we will require developers to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms and sets out the mechanisms for how this will be achieved.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA15.4	<p>Given the level and nature of the constraints, we consider a 30% reduction (549 dwelling) should be built into the supply assessment from these sites (including Chew Brook). P&amp;D have some concerns with the deliverability of brownfield sites. The demolition of existing buildings and remediation of the land can cause serious delays in bringing the site forward and can also incur additional costs, some of which are often only uncovered once the development has begun. The 90 homes allocated on this site is not sufficient</p>	<p>The council has taken a cautious but reasonable approach in looking at the capacity of the available developable area in determining the figure of around 90 homes and having regard to flood risk responsibilities.</p> <p>As acknowledged in the updated Viability Assessment [<a href="#">03.01.04</a>] and summarised in the Chew Brook Vale Topic Paper [<a href="#">10.05.35</a>] it may be possible, subject to an appropriate site-specific FRA, that capacity on the site can be increased. However, until this is completed a higher residential</p>	PD Northern Trust Asset Management

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>to cover absurd development costs including demolition and remediation and the strategic transport costs.</p> <p>If the flood risk concerns were resolved and the dwelling numbers increased to 135 dwellings (although this site is not allocated for 135 dwellings), the scheme becomes marginal in terms of viability. The site should not be allocated if it is not viable and it is likely that it wouldn't be brought forward and therefore Oldham would not meet its housing requirements.</p>	<p>figure cannot be stated. As such, informed by site constraints Policy JP Allocation 15 proposed around 90 homes, which allows for flexibility.</p> <p>GM is well placed to help bring forward brownfield sites, as outlined in the Housing Topic Paper (<a href="#">06.01.03</a>). The Delivering the Plan chapter of the Plan also provides further detail.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA15.5	<p>Makes comments on behalf of land at Ashton Road / Bardsley Vale Ashton, Oldham, which was in the 2019 GMSF. No technical evidence to support sites removal. The justification for removal is limited. Promotional material included and site description, constraints etc.</p> <p>In relation to Chew Brook Vale states there are significant costs associated with demolition of the existing buildings on site and subsequent remediation. Land ownership and rights of access also question its deliverability. Based on the sites highlighted above (Beal Valley, Bottom Field Farm, Broadbent Moss, Chew Brook Vale and Land South of Coal Pit Lane), we consider there is a realistic prospect that many of the proposed allocations will not deliver the quantum of housing envisaged within the life-span of the plan.</p>	<p>The land at Ashton Road was submitted and considered previously as part of the site selection process. See Call for Sites ID 1452606077834 in Omissions Report. The site falls in OL-AS-7.</p> <p>Appendix 7 of the Site Selection Paper (<a href="#">03.04.09</a>) explains the reasons why the land at Ashton Road formerly part of the Ashton Road Corridor proposed strategic allocation (Policy GM Allocation 13, 2019 Draft GMSF) has been removed and no longer allocated.</p> <p>The Chew Brook Vale site is under one ownership. There will be costs associated with remediation, which is acknowledged.</p> <p>A cautious approach has already been taken with the Chew Brook Vale allocation to take into account constraints such as flood risk.</p> <p>As acknowledged in the updated Viability Assessment [<a href="#">03.01.04</a>] and summarised in the Chew Brook Vale Topic Paper [<a href="#">10.05.35</a>] it may be possible, subject to an appropriate site-specific FRA, that capacity on the site can be increased. However, until this is completed a higher residential figure cannot be stated. As such, informed by site constraints Policy JP Allocation 15 proposed around 90 homes, which allows for flexibility.</p>	Sophia Flemming Consulting Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>However, GM is well placed to help bring forward brownfield sites, as outlined in the Housing Topic Paper (<a href="#">06.01.03</a>). The Delivering the Plan chapter of the Plan also provides further detail.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
	<b>Use of Green Belt / Brownfield Land</b>		
JPA15.6	Disagree with building on Green Belt land and loss of green space. Brownfield land should be re-developed first. Sets a precedent for developers to justify building on Green Belt when they think justified.	<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 housing land needs and supply can be found in the Housing Topic Paper (<a href="#">06.01.03</a>). Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [<a href="#">07.01.25</a>]</p> <p>In addition, Chew Brook Vale site allocation includes brownfield land.</p> <p>Development in the redefined Green Belt will be assessed in line with national planning policy and Local Plans, with proposals considered on a case-by-case basis. Therefore, the plan does not set a precedent or stepping stone.</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.
JPA15.7	The site area has been reduced to minimise Green Belt release and now only relates to the brownfield mill site.	Noted.	Debbie Abrahams
JPA15.8	Proposals are not in line with the National Planning Policy Framework. Flies in the face of policy of Green belt legislation to keep in check the unrestricted sprawl of large built-up areas. Will create urban sprawl and merging of	The Exceptional Circumstances are set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary (July 2021) ( <a href="#">07.01.25</a> ).	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	neighbouring towns. There are no exceptional circumstances under which land can be released from the Green Belt.	<p>The Green Belt harm assessment (<a href="#">07.01.09</a>) identifies that the allocation makes a relatively limited contribution to checking the sprawl of Greater Manchester, and a relatively limited contribution to preserving the setting of the historic town of Greenfield.</p> <p>The Stage 2 Green Belt Study Addendum: Assessment of Proposed 2021 PfE Plan Allocations (<a href="#">07.01.23</a>) assessed the revised boundary of the PfE allocation and states (page 30) much of the area now proposed for release is occupied by built development that diminishes Green Belt openness, and the remainder of the site, although it contains some tree cover and some storage areas (including a former water body), is significantly influenced by that built development. The revised allocation therefore makes only a relatively limited contribution to Purpose 3 (assist in safeguarding the countryside from encroachment), and its degree of separation from the urban edge, relative to its size, together the extent of development on the site, means that it does not contribute to preventing the sprawl of the large built-up area of Greater Manchester.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA15.9	This former industrial site is now defunct and has not operated for many years. Why this site has been proposed suggests it is a reward to developers in order to get them on side - otherwise it is inexplicable.	<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 <a href="#">[02.01.10]</a>. The allocation is considered to meet the spatial strategy and strategic objectives of PfE, contributing to the spatial objective of boosting Northern Competitiveness, whilst contributing to meeting the housing need across Oldham.</p> <p>The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE.</p> <p>No changes are considered necessary.</p>	Christopher Tansley
	<b>Recreation / Landscape / Character / Heritage /</b>		

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA15.10	<p>Site is a natural beauty spot used for recreation. The proposals will encroach on recreation and the enjoyment of semi wild places.</p> <p>The green belt land should be brought back into full production, alongside provision for wildlife and recreation.</p>	<p>The site is a private mill complex, although there are footpaths used and these will be incorporated into the masterplan for the site.</p> <p>Policy JP Allocation 15 states developments will be required to:</p> <p>6. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995;</p> <p>7. Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;</p> <p>15. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.</p> <p>The Stage 2 GM Green Belt Study Potential Enhancement Opportunities for the Green Belt Appendix D (<a href="#">07.01.16</a>, page 119 onwards) evidence base highlights opportunities to enhance the surrounding Green Belt around Chew Brook Vale including recreational opportunities.</p> <p>Therefore, it is not considered that any changes to the plan are necessary.</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA15.11	<p>Concerned that development will harm the landscape, character, beauty, views and village setting. Site borders Dove Stones reservoir a beautiful tranquil and highly popular and unspoiled area where people walk and exercise. The proposal will ruin the area, destroy the character and natural environment - creating urban sprawl in the foothills of the Peak District National Park.</p> <p>The visual impact from the existing Greenbelt will be significant and this is not adequately considered.</p> <p>There are still issues relating to the substantial intensification of activity on the site, which could threaten the countryside characteristics of the Dovestone gateway and cause probable harm to the Peak District National Park setting. The allocation should be within the curtilage of the previously developed footprint.</p> <p>The site is adjacent the PDNP and within influencing distance of listed buildings and conservation area.</p> <p>Dove Stones should be retained as a local beauty spot.</p>	<p>The allocation has been reduced significantly since the 2016 and 2019 draft GMSF plans and is now contained to the mill complex boundary.</p> <p>The Green Belt harm assessment identifies that the allocation makes a relatively limited contribution to checking the sprawl of Greater Manchester (<a href="#">07.01.09</a>).</p> <p>Policy JP Allocation 15 requires development to:</p> <p>6. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995;</p> <p>7. Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;</p> <p>8. Be designed to minimise the landscape impact having regard to the findings and recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Open Moorlands and Enclosed Upland Fringes (Dark Peak).</p> <p>Oldham Council will continue to collaborate with PDNPA with regard to proposals for Chew Brook Vale, to resolve any detailed issues in the most appropriate way, including the preparation and implementation of the Visitor Management Plan.</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>A Historic Environment Assessment for Places for Everyone (Addendum, June 2021) (HEA) (<a href="#">10.05.16</a>) has been undertaken. This confirms that the site does not make any contribution to the significance of the designated heritage assets assessed. The redevelopment of the site may enhance the wider setting of Greenfield House, however. The HEA recommendations have informed Policy JP Allocation 15, specifically criterion 19.</p> <p>Reflecting the above, no changes to the plan are considered necessary.</p>	
JPA15.12	We support the wording of this allocation.	The support is welcomed.	Historic England
JPA15.13	<p>Criterion 8 strongly supported.</p> <p>In relation to Criterion 16 because of the location at the edge of the National Park consideration needs to be given to the location and setting of any additional sport and recreation facilities.</p>	<p>Support welcomed.</p> <p>PfE Policy Allocation 15 states that development at this site will be required to be in accordance with a comprehensive masterplan and Design agreed by the local authority. This will need to demonstrate how the policy requirements are to be met, including the provision for new and/or the improvement of existing open space, sport and recreation facilities.</p> <p>Therefore, no changes are considered necessary in response to this point.</p>	Peak District National Park Authority
	<b>Ecology</b>		
JPA15.14	<p>Development has been significantly reduced in size and is now primarily focused on brown field development. No survey information has been provided and it is difficult to assess the ecological considerations required.</p> <p>Google® Maps indicates that there are areas of scrub or woodland and some grassland areas within the development boundary, which will need to be mitigated for. The Trust welcomes and supports criterion 9. An assessment on the use of the site by bats and breeding birds will be required, as will consideration of the adjacent pond, woodland and watercourse habitats. The</p>	<p>A Preliminary Ecological Appraisal Addendum (2021) (<a href="#">10.05.18</a>) 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 (pages 11-12). This has informed the allocation policy.</p> <p>The 2020 appraisal concludes on page 38 (<a href="#">10.05.08</a>) that substantive ecological constraints of such weight that sites should be withdrawn from consideration for allocation are not present on any of the areas assessed.</p>	The Wildlife Trusts

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Trust notes and welcomes criterion 7, 10 and 11. The integration of the site with the surrounding landscape is vital: welcome criterion 12 and 13. The policy should also include a requirement for built design driven by the biological environment – such as green roofs and walls, permeable surfacing, swallow-eaves, and bat-tiles. Welcomes policy text 11.176.</p>	<p>A Habitat Regulation Assessment (HRA) has been carried out to appraise the 2020 GMSF and PfE 2021 (<a href="#">02.02.01 – 02.02.02</a>).</p> <p>Reflecting on the above Policy JP Allocation 15 states that development will be required to:</p> <p>9. Retain and enhance biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment;</p> <p>10. Provide further surveys on extended phase 1 habitats, bats and birds to inform any planning application;</p> <p>11. Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;</p> <p>12. Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement; and</p> <p>13. Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA15.15	<p>Concerns that development and activity will have a negative impact on wildlife and habitats for feeding, hunting, breeding etc.</p> <p>We are trying to bring back nature into our urban areas as part of our efforts to tackle global warming and diversify our wildlife - this is just contributing to its destruction.</p> <p>The environmental impact of construction will be significant and specific trade offs should be made- for example wildlife corridors, more Greenbelt allocation in the local area, investment in the Peak District park etc.</p>	<p>Please see response at Row JPA15.14.</p> <p>In addition, Policy JP Allocation 15 also requires in criterion 15 that development contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment (<a href="#">07.01.16</a>).</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.
JPA15.16	9, 10 & 11 these conditions are strongly supported.	Support welcomed.	Peak District National Park Authority
	<b>Highways / Access / Traffic / Parking</b>		
JPA15.17	This site is unlikely to lead to significant impacts on the SRN from either an individual or cumulative perspective.	Noted.	National Highways
JPA15.18	The delivery of this allocation requires the identification and design of a suitable vehicular access from the A635, as well as the delivery of a spine road that is capable of providing vehicular access to the allocation. A review of options for the site access has identified several fundamental physical and environmental constraints which are hindering access to the site. Question the deliverability of this allocation.	The Chew Brook Vale Site Allocation Topic Paper ( <a href="#">10.05.35</a> ) states on page 39 that development will need to provide for an improved new access point to the site off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standard. The high-level indicative concept plan presented access arrangements as part of delivery of the wider allocation which are still of relevance in terms of how access may be gained to the revised boundary. However - further work at masterplanning (a requirement of JPA15, criterion 1) / planning application stage will be required. As stated at paragraph 11.178 of the PfE plan any proposals will need to be agreed by the local highway authority and to adoptable standards.	PD Northern Trust Asset Management

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>In summary, the Topic Paper has highlighted that the Locality assessment has provided an initial indication that the allocation is deliverable (page 33 <a href="#">10.05.35</a>).</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	
JPA15.19	<p>Development will be unsustainable and lead to an increase in traffic and will cause air pollution.</p> <p>How does this address climate change - reducing emissions - congestion - not exactly close to major rail links and motorways.</p> <p>It does not go far enough in mitigating the impact on the existing community, in particular the increase in traffic. It is not specific enough on how the Peak District, moors, and Dove Stones will benefit (for example increased parking etc). It does not enhance the local public transport in any specific any meaningful way (for instance increased train services and better links to the station such as improves pedestrian access, cycle lanes etc). Increased traffic from commercial use has not been adequately considered.</p>	<p>PfE contains a vast number of thematic policies all of which contribute to addressing climate change – it contains policies on 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). The site was also subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal (<a href="#">02.01.03-02.01.06</a>). This assessment considered the policy in relation to climate indicators.</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 <a href="#">09.01.01</a> GM Transport Strategy 2040 and <a href="#">09.01.02</a> GM Transport Strategy Our Five Year Delivery Plan 2021-2026.</p> <p>The Chew Brook Vale Site Allocations Topic Paper (<a href="#">10.05.35</a>), section 10 explains that locality assessments were completed as part of the evidence base to assess and evaluate the impact of the proposals on the transport network. These locality assessments forecast the likely level and distribution of traffic generated by each allocation and assess its impact on the transport network. Where that impact is considered significant, possible schemes to mitigate that impact have been developed, tested and costed where appropriate.</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>The Site Allocations Topic Paper outlines the list of interventions considered necessary to support the Chew Brook Vale site and mitigate the cumulative impacts.</p> <p>In summary, the assessment has provided an initial indication that the allocation is deliverable and to inform viability (page 33, <a href="#">10.05.35</a>). Further detailed work will be necessary to identify the detail of the access arrangements necessary. However, no offsite issues with the wider highway network have been identified that would prevent such an allocation being made based on the assessed impacts on the transport network.</p> <p>Informed by the findings of the Locality Assessment Policy JP Allocation 15 requires:</p> <ol style="list-style-type: none"> <li>4. Provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standards; and</li> <li>5. Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site.</li> </ol> <p>Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p>	

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		Therefore, it is not considered necessary to make any changes to the plan.	
JPA15.20	In relation to criterion 5 the delivery of accessible transport including walking, cycling and public transport could help with wider visitor management issues at Dove Stone. Failure to deliver such facilities could lead to parking displacement in and around the development, particularly on Bank Holidays and at weekends.	<p>Policy JP Allocation 15 states development at this site will be required to:</p> <p>5.) Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site; and</p> <p>6. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995.</p> <p>Furthermore, PfE Policy JP-C7 'Transport Requirements of New Development' sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p> <p>Oldham Council will continue to collaborate with PDNPA with regard to proposals for Chew Brook Vale, to resolve any detailed issues in the most appropriate way, including the preparation and implementation of the Visitor Management Plan.</p>	Peak District National Park Authority

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.	
	<b>Climate Change – energy, flood risk and water efficiency</b>		
JPA15.21	Development should be energy efficient. Non eco homes.	<p>In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Policy JP-P 1 requires development is resource-efficient and Policy JP-S 2 requires development to follow the energy hierarchy and sets out the approach for moving towards zero carbon homes.</p> <p>In addition, JP Allocation 15 requires development to:</p> <p>20. Ensure high quality design that is environmentally and sustainably driven, including grey harvesting and recycling, maximising energy efficiency through good building design and fuel-efficient technology, a reduction of car usage and household recycling facilities.</p> <p>No changes are considered necessary to the plan.</p>	Vicky Harper
JPA15.22	The area is a flood plain, building on it is not a good idea. Development will increase flood risk. It does not go far enough in protecting the local water courses (for example from run off from new roads etc).	<p>The site has been assessed as part of the Strategic Flood Risk Assessment (SFRA). The site was subject to the exceptions test as part of the SFRA Level 2 and following this further work was commissioned.</p> <p>The results of this can be seen in the Chew Brook Vale Level 2 Strategic Flood Risk Addendum (<a href="#">10.05.19</a>) and these are summarised in the JPA15 Chew Brook Vale Allocation Topic Paper (<a href="#">10.05.35</a>).</p> <p>In response to the above Policy JP Allocation 15 requires development to:</p> <p>13.) Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive; and</p> <p>21.) Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.</p> <p>No changes to the allocation policy are considered necessary taking into account the proportionate evidence base.</p>	
JPA15.23	<p>Sets out tracked changes UU would like to be made to Chew Brook policy criterion 21. Also request for additional criteria stating 'New dwellings will be required to at least meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Non-domestic buildings will also be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate.'; and 'Any proposal must have full regard to the existing utility infrastructure and the adjacent reservoir. Early dialogue will be required with United Utilities to understand the implications of the proximity to the reservoir and any other assets so that this can be fully reflected in the design and masterplanning process. This should include full consideration of access arrangements to the reservoir.'</p>	<p>A Strategic Flood Risk Assessment has been undertaken (<a href="#">04.02.01</a>) across the plan, and the requirements for a site-specific FRA are set out in the Level 2 SFRA (<a href="#">10.05.19</a>). Policy JP-S5 provides further detailed policy in relation to Flood Risk and water efficiency. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter and no changes are required and no change is considered necessary.</p>	United Utilities Group PLC
	<b>Housing</b>		
JPA15.24	<p>Non affordable housing.</p> <p>More investment in the existing housing stock is required. Offer grants for home insulation, roof repair and brickwork pointing. Offer assistance to fit</p>	<p>Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority.</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	affordable heating and safe electrical circuits. Councils should be able to step in and assist.	<p>PfE Publication Plan (2021) Policy JP Allocation 15 criterion 3 states development will be required to provide affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements.</p> <p>A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.</p> <p>Paragraph 7.11 of the Plan recognises the role of the existing housing stock and that it will be important to make the most out of it. Efforts will be made to further reduce long-term vacancies, including by seeking Government funding and working with property owners, but any significant further reduction in vacancies could begin to make it more difficult for people to move home. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement. In any event, Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock. In addition, there are council programmes that support the investment in stock such as <a href="#">Warm Homes Oldham</a> and <a href="#">Empty Homes</a>.</p> <p>No changes to the allocation policy are considered necessary.</p>	
JPA15.25	The additional housing exceeds the governments predicted requirements of the area.	<p>Further evidence has been produced in relation to the housing needs over the life time of the plan period. It is appropriate for the overall land supply targets set out within the plan to be based on the housing land need figures, derived from the evidence base. The Housing Topic Paper (<a href="#">06.01.03</a>) sets out the methodology for calculating housing need.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Tracy Raftery

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA15.26	Given the brownfield status and existing screening that this site is afforded a high density scheme would work well here. Will the site deliver properties at the lower end of the market that are needed by the people of Saddleworth who are struggling to afford to buy in the area? Further explanation justifying the proposed approach would be welcomed.	<p>Policy JP-H E sets out density requirements.</p> <p>Policy JP Allocation 15 states development at this site will be required to:</p> <ol style="list-style-type: none"> <li>1. Be in accordance with a comprehensive masterplan and Design Code agreed by the local authority; and</li> <li>3. Deliver around 90 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements.</li> </ol> <p>Oldham Council will continue to collaborate with PDNPA with regard to proposals for Chew Brook Vale, to resolve any detailed issues in the most appropriate way, including the preparation and implementation of the Visitor Management Plan.</p> <p>No changes are considered necessary.</p>	Peak District National Park Authority
	<b>Retail, commercial and tourism</b>		
JPA15.27	The additional warehousing exceeds the governments predicted requirements of the area.	<p>Further evidence has been produced in relation to the employment land demand over the life time of the plan period. It is appropriate for the overall land supply targets set out within the plan (tables 6.1 and 6.2) to be based on the employment land need figures, derived from the evidence base. The Employment Topic Paper <a href="#">[05.01.04]</a> sets out the methodology for employment need.</p> <p>It is considered that a proportionate evidence base has been provided to support the policy, therefore no changes are considered necessary.</p>	Tracy Raftery
JPA15.28	Supportive of retail and commercial use to support the growing tourism industry linked to Dovestone Reservoir. 90 family and executive homes with 27 homes being affordable is supported which will also contribute to tourism related employment.	Support welcomed.	The Greater Manchester Housing Providers
JPA15.29	The development needs to focus on sustainable access to these tourism and leisure facilities along with visual journey from the development to the National	Policy JP Allocation 15 states development at this site will be required to:	Peak District National Park Authority

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>Park and vice versa. It is important that development to support tourism and leisure facilities is appropriate to the location and its setting. Support statement in criterion 6 and the NPA welcome the opportunity to work with GMCA / Oldham MBC and other appropriate stakeholders on a visitor management plan.</p> <p>Paragraph 11.171 the development offers an important opportunity to raise awareness and appreciation of the Peak District National Park for residents and visitors to the area. Paragraph 11.175 this approach is supported.</p>	<p>1. Be in accordance with a comprehensive masterplan and Design Code agreed by the local authority;</p> <p>5.) Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site; and</p> <p>6. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995.</p> <p>Oldham Council will continue to collaborate with PDNPA with regard to proposals for Chew Brook Vale, to resolve any detailed issues in the most appropriate way, including the preparation and implementation of the Visitor Management Plan.</p> <p>Therefore, no changes are required to the allocation policy.</p>	
	<b>Infrastructure</b>		
JPA15.30	There is currently a lack of infrastructure.	<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 where appropriate green spaces, schools and medical facilities.</p> <p>Policy JP Allocation 15 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.</p>	See Appendix.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>The Chew Brook Vale Allocation Topic Paper (<a href="#">10.05.35</a>) outlines details of infrastructure.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	
	<b>Minerals</b>		
JPA15.31	Disappointed that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
	<b>Other</b>		
JPA15.32	Believes process is corrupt and driven by greed. Plan is pandering to the planners, developers and landowners, and will not benefit the local community. People will lose faith in our representative leadership.	Places for Everyone has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. Details of the process can be found at paragraphs 1.59 to 1.68 of the Publication Plan and the introductory chapter (pages 4 to 6) of the Chew Brook Valley Allocation Topic Paper [ <a href="#">10.05.35</a> ]. No change to the policy is considered necessary.	See Appendix.
JPA15.33	No comments provided. Sound boxes ticked.	Support welcomed.	See Appendix.
JPA15.34	Plan is unsound – no specific comments.	It is considered that an appropriate and proportionate evidence base has been provided to support the Plan and Policy JPA15 Chew Brook Vale.	See Appendix.

## PfE 2021 Policy JP Allocation 16 – Cowlshaw

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Principle of Development / Green Belt</b>		
JPA 16.1	There is already too much traffic congestion in this area. There should be an independent traffic and transport assessment.	<p>All transport implications of the Strategic Allocations have been assessed via the Locality Assessments, which can be accessed here: <a href="#">[09.01.11 – Transport Locality Assessments – Oldham]</a>. Chapter 10 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a> summarises the findings of the Locality Assessment.</p> <p>Furthermore, Policy JP-C7 Transport Requirements of New Development requires planning applications to be accompanied by a Transport Assessment / Transport Statement and Travel Plan where appropriate. No changes are considered necessary.</p>	Lindsey Armstrong
JPA 16.2	Brownfield land is available for development including empty buildings in Shaw. Also, the allocation sets a precedent for developers to justify building on Greenbelt when they think justified.	<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, it has been necessary to remove some land from the Green Belt / Other Protected Open Land and to allocate this land within the Plan for residential development. The details of the employment land needs and supply can be found in the Employment Topic Paper <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p> <p>With regards to the allocation setting a precedent, as set out at paragraph 8.54 of the PfE Plan our Green Belt was originally designated in full in 1984 as part of the Greater Manchester Green Belt. It has since seen a series of minor amendments through individual district plans. The scale of development that needs to be accommodated within the Plan area up to 2037 means that some changes to the Green Belt boundaries are</p>	See appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>necessary in line with the paragraphs 140 and 141 of NPPF. The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. Development in the redefined Green Belt will be assessed in line with national planning policy and Local Plans, with proposals considered on a case by case basis.</p> <p>No changes are considered necessary.</p>	
JPA16.3	Encroaches on peoples recreational space and the enjoyment of the semi wild places.	<p>Policy JP-P2 Green Infrastructure Network sets out a strategic approach for the protection, management and enhancement of our Green Infrastructure. It states that wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network in accordance with the priorities identified. The Plan also includes policies JP-G6 Urban Green Space, JP-G8 Standards for Greener Places and JP-P7 Sport and Recreation.</p> <p>Furthermore, Policy JPA16 Cowlshaw includes criteria 6) and 10) in relation to open space and green infrastructure, which require the following:</p> <p>Deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas. This is to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation; and</p> <p>Provide for new and/or the improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements. This includes the retention or relocation, if required, and improvement of the existing play area off Kings Road, within the site.</p>	Robert Mayall

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		No changes are considered necessary.	
JPA16.4	We are trying to bring back nature into our urban areas as part of our efforts to tackle global warming and diversify our wildlife - this is just contributing to its destruction, Its even more pitiful due to the fact we have brown field sites within proximity of these Green Belt Sites.	Please see responses at Row JPA16.2 regarding PfE's very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and that at Row JPA16.3 regarding the provision of green infrastructure and open space. In addition, criterion 8 of Policy JPA16 Cowlshaw also requires development on the site to retain and enhance the hierarchy of biodiversity within the site, notably the existing Cowlshaw Ponds SBI and the area of priority habitat to the south of Crompton Primary School, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment.  No changes are considered necessary.	Robert Mayall
JPA16.5	The people of Greater Manchester will lose all faith in our so called "representative" leadership as this goes against all that we though our councils stood for!	Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a> . Details of the process can be found at paragraphs 1.59 to 1.68 of the <a href="#">Publication Plan</a> and the introductory chapter (pages 4 to 6) of the Cowlshaw Allocation Topic Paper <a href="#">[10.05.36]</a> .  No changes are considered necessary.	Robert Mayall
JPA16.6	Flies in the face of policy of Green belt legislation to keep in check the unrestricted sprawl of large built-up areas.	The site is currently designated as Other Protected Open Land (OPOL) in Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (Oldham's Local Plan). It is not Green Belt.  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 <a href="#">[02.01.10]</a> . The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. No changes are considered necessary.	Paul Roebuck

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA16.7	How does this address climate change - reducing emissions - congestion.	<p>The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. 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.</p> <p>Policy JP-C 1 'An Integrated Network' also 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>As set out in paragraph 11.184 of the <a href="#">publication plan</a>, it is considered that the site is in a sustainable and accessible location, on the edge of a large area of open land and in a successful and attractive neighbourhood, and connected to neighbouring communities in Low Crompton, Cowlshaw, Royton and nearby town centres, including Shaw, where there is a Metrolink stop. Any development would be required to enhance links to and from the site to the bus network, to encourage sustainable modes of travel and maximise the site's accessibility, developing the existing recreation routes and Public Right of Way network. No changes are considered necessary.</p>	Paul Roebuck
JPA16.8	On site pylon and overhead power lines make the site difficult for development.	Section 3 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a> sets out details of the site. The gross site area measures 32.2 hectares, with the developable area measuring approximately 13.5 hectares. This has been informed by site constraints, including the pylon and overhead power lines which, alongside the area of land to the west that forms part of the Crompton and Royton Golf Club, have not been included in the developable area. This has informed the developable area and site capacity. Details can be found in the Cowlshaw Indicative Concept Plan Report <a href="#">[10.05.21]</a> and	Save Greater Manchester Green Belt

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		Cowlshaw Indicative Concept Plan <a href="#">[10.05.20]</a> . No changes are considered necessary.	
JPA16.9	Land ownership and therefore availability may be a constraint.	<p>The landowner and associated agent have submitted representations in support of the allocation, detailing the availability of the site.</p> <p>In terms of the site and it's availability, this has also been proven by the submission of and approval of an outline planning application (<a href="#">PA/344179/19</a>) and a subsequent reserved matters approval (<a href="#">RES/346720/21</a>) at the southern end of the allocation and another application (<a href="#">FUL/346529/21</a>) for the northern parcel, accessed via Denbigh Drive. No changes are considered necessary.</p>	Save Greater Manchester Green Belt
JPA16.10	Fails to pay sufficient regard to reasonable alternatives (in terms of housing need figure) and is seeking to be over flexible in relation to land supply.	<p>Evidence has been produced in relation to the housing needs over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the Plan to be based on the housing need figures derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> 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. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 677 new homes per year. The PfE sets out a proposed housing requirement for Oldham of 677 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper. Compared to the GMSF 2019, Oldham's housing need, as set out in the PfE 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.</p> <p>With regards to consideration being given to reasonable alternatives (including those in the urban area), the distribution of development is</p>	Save Shaw's Green Belt

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		<p>based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a>. Furthermore, the Plan places a strong focus on directing new housing towards previously-developed sites within the existing urban area. A large number of previously-developed sites suitable for housing have been identified in the council's Brownfield Register and Strategic Housing Land Availability Assessment. No changes are considered necessary.</p>	
JPA16.11	<p>Housing target is not accurate and was made prior to Brexit. The Housing Need figure is a guideline, not a target.</p>	<p>In relation to scale of development 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 <a href="#">[02.01.10]</a> and Housing Topic Paper <a href="#">[06.01.03]</a> which includes boosting the competitiveness of the north of the conurbation. Evidence to support preparation of the Plan has been produced in relation to the housing needs over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the plan to be based on the housing and employment land need figures, derived from the evidence base. The Housing Topic Paper <a href="#">[02.01.10]</a> sets out the methodology for calculating housing need.</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 <a href="#">[05.01.03]</a>. No changes are considered necessary.</p>	Save Shaw's Green Belt
JPA16.12	<p>The Plan is deemed to be unsound as not realistic. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.</p>	<p>The housing methodology is covered in the Housing Topic Paper <a href="#">[06.01.03]</a>.</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</p>	Save Shaw's Green Belt

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		<p>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. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 677 new homes per year. The PfE sets out a proposed housing requirement for Oldham of 677 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Topic Paper. Compared to the GMSF 2019, Oldham's housing need, as set out in the PfE 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible. No changes are considered necessary.</p>	
JPA16.13	Insufficient evidence to demonstrate exceptional circumstances.	<p>The site is currently designated as Other Protected Open Land (OPOL) in Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (Oldham's Local Plan). It is not located within the Green Belt and is therefore not subject to the exceptional circumstances test. Furthermore, the site is sequentially preferable due to its classification as Other Protected Open Land (OPOL). The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">[07.01.25]</a>. It is considered that an appropriate evidence base has been prepared to support the plan. No changes are considered necessary.</p>	See Appendix
JPA16.14	The Plan has insufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt.	<p>The Growth and Spatial Options Topic Paper <a href="#">[02.01.10]</a> sets out the approach to accommodating growth within the plan area. The Green Belt Topic paper <a href="#">[07.01.25]</a> sets out the alternatives considered prior to the release of Green Belt land and the site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. Further information can also be found in Green Belt Topic Paper and Case of Exceptional Circumstances to amend the Green Belt boundary <a href="#">[07.01.25]</a>.</p>	Save Shaw's Green Belt

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		It is considered that an appropriate evidence base has been prepared to support the plan. No changes are considered necessary.	
JPA16.15	Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan.	It is considered that a proportionate evidence base has been provided to support the Plan and Policy JPA16 Cowlshaw. Evidence that has informed Policy JPA16 Cowlshaw has been summarised in the Topic Paper <a href="#">[10.05.36]</a> .	Save Shaw's Green Belt
JPA16.16	The proposed allocations should be re assessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan.	<p>The Site Selection Background Paper <a href="#">[03.04.01]</a> and the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> provides information on the methodology for selecting the strategic allocations/ growth areas. Further detail on the site's selection is contained within the allocation topic paper <a href="#">[10.05.36]</a>, Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.</p> <p>With regards to flooding, each site has been subject to a SFRA <a href="#">[04.02.01]</a> and <a href="#">[04.02.18]</a>, the results of which have been summarised in the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>.</p> <p>The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within chapter 10 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a> (<a href="#">pages 20-35</a>), Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>.</p> <p><a href="#">No changes are considered necessary.</a></p>	Save Shaw's Green Belt

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JPA16.17	Insufficient consideration has been paid within the Plan to the long term impacts of Covid, both on the economy and on human behaviours.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options <a href="#">[05.01.03]</a> . <a href="#">No changes are considered necessary.</a>	See Appendix
JPA16.18	Linked to refusal to release Mill Strategy as part of a FoI Oldham's GB release is not compliant with NPPF para 141 (which explicitly addresses the conditions for GB release).	Regarding comments about the FoI request, this is not a matter for PfE and would be considered separately to the plan preparation process.  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. The council has identified a large number of previously-developed sites suitable for housing have been identified in the Brownfield Register and Strategic Housing Land Availability Assessment. As set out in paragraph 7.8 of the Plan these will help to address existing dereliction and poorly used sites, as well as reducing the need to release greenfield and Green Belt land for development. The Plan also recognises that it will be important to make the most of the existing housing stock. No changes are considered necessary.	Save Shaw's Green Belt
JPA16.19	Considered that the affordability problem in the Oldham Borough are severely distorted, stemming mostly from Saddleworth.  Effectively it is being argued by OMBC that affordability is an exceptional circumstance for the allocated houses. It is highly questionable that the affordability adjustment complies with NPPF para 140. These houses are not being built to serve housing need.  Allocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.	<a href="#">The 06.01.02 Greater Manchester Strategic Housing Market Assessment</a> Chapter 3.2 Standard methodology: Local Housing Need (pages 30 to 38) and Chapter 7 Affordable Housing Need Assessment (pages 207 to 228) provide detailed information on the need for affordable housing in Greater Manchester, including Oldham. As detailed in <a href="#">Document 06.01.03 Housing Topic Paper</a> Chapter 2 (Paragraphs 2.8 to 2.14) , the NPPF expects strategic policy-making authorities to follow the standard method set out in the PPG for assessing local housing need. This includes an adjustment should be made to consider market signals, specifically the affordability of housing. We do not consider that exceptional circumstances exist to justify departure from the standard methodology.	Save Shaw's Green Belt

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		Policy JPA16 Cowlshaw requires development on the site to provide for affordable homes in line with local planning policy requirements. The policy goes on to state that this will include a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Local evidence in the form of Oldham's Housing Strategy and Local Housing Needs Assessment will inform the Local Plan affordable housing policy. No changes are considered necessary.	
JPA16.20	Development of the Site would have a medium sensitivity of impact on the protected character area which would require mitigation.	Chapter 17 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a> summarises the evidence from the Landscape Character Assessment (2018) in relation to the allocation and the recommended mitigation measures. In response, policy JPA16 requires any development to have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. No changes are considered necessary.	Save Shaw's Green Belt
JPA16.21	Not compliant with the Discrimination and Equality Act 2010.	Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a> . Further details can be found in Oldham Council's SCI Statement of Compliance. An <a href="#">Equalities Impact Assessment</a> has been undertaken of the SCI. No changes are considered necessary.	Save Shaw's Green Belt
JPA16.22	Failed to take into consideration those that do not have access to the internet.	Consultation has been carried out in line with Oldham Council's <a href="#">Oldham's Statement of Community Involvement</a> . Further details can be found in Oldham Council's SCI Statement of Compliance. No changes are considered necessary.	Save Shaw's Green Belt
JPA16.23	This process is being driven by greed and corrupt politicians.	Places for Everyone has been prepared in accordance with the <a href="#">Town and Country Planning (Local Planning) (England) Regulations 2012</a> . Details of the process can be found at paragraphs 1.59 to 1.68 of the <a href="#">Publication Plan</a> and the introductory chapter (pages 4 to 6) of the Cowlshaw Allocation Topic Paper <a href="#">[10.05.36]</a> . No change to the policy is considered necessary.	See Appendix

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JPA16.24	The area provides a buffer between Royton and Shaw.	<p>Criterion 6 of the allocation policy states that any development will be required to deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas. This is to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.</p> <p>Furthermore, criterion 7 of the allocation policy states that any applications need to have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines. No changes are considered necessary.</p>	See Appendix
JPA16.25	Loss of the abattoir would remove a source of local employment. Concern about the loss of such an important part of the farming industry.	Chapter 6 of the Cowlshaw Topic Paper provides details of planning history relating the site including those of <a href="#">PA/344179/19</a> . This outline planning permission was granted in September 2020 for the demolition of existing buildings and for residential development with all matters reserved except for the principal means of access from Cocker Mill Lane for a residential development. The proposal is for up to 250 new homes and relates approximately to the mid-south eastern portion of the proposed allocation, including the abattoir, within a single ownership. No changes are considered necessary.	See Appendix
JPA16.26	Houses will be expensive and not affordable for first time buyers.	Criterion 2) of JPA 16 Cowlshaw sets out that any development will be required to provide a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. Whilst criterion 3 requires the provision of affordable homes in line with local planning policy requirements. The policy goes on to recognise that the site will help to diversify the existing housing stock in the area and boroughwide. The site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding	See Appendix

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		to the type and range of housing available. Affordable housing will also be provided as part of any development of the site, including a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. No changes are considered necessary.	
JPA16.27	Unsustainable	<p>Comment noted. Policy JP-S1 Sustainable Development sets out specific policies to achieve sustainable development, including measures in relation to supporting infrastructure and biodiversity [see pages 82-83 of the Publication Plan for the full policy].</p> <p>The site is considered to be in a sustainable and accessible location, on the edge of a large area of open land. It is also located near to existing neighbouring residential communities. See allocation Policy JPA16 Cowlshaw, <a href="#">publication plan</a>, paragraph 11.182]. No changes are considered necessary.</p>	Vicky Harper
JPA16.28	The proposals should use a lower housing target with realistic economic ambitions. The GMCA has not adequately challenged the Government on this.	Evidence has been produced in relation to the housing needs over the life-time of the plan period. It is appropriate for the overall land supply targets set out within the Plan to be based on the housing need figures derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> 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. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 677 new homes per year. The PfE sets out a proposed housing requirement for Oldham of 677 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper. Compared to the GMSF 2019, Oldham's housing need, as set out in the PfE 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.	Tracy Rafferty

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		<p>With regards to consideration being given to reasonable alternatives (including those in the urban area), 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 <a href="#">[02.01.10]</a>. Furthermore, the Plan places a strong focus on directing new housing towards previously-developed sites within the existing urban area. A large number of previously-developed sites suitable for housing have been identified in the council's Brownfield Register and Strategic Housing Land Availability Assessment.</p>	
JPA16.29	<p>Note site is designated as OPOL and consider that there are local benefits in staying unbuilt.</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, it has been necessary to remove some land from the Green Belt / greenfield land (in the form of OPOL) and to allocate this land within the Plan for residential development. 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 <a href="#">[02.01.10]</a>. The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE.</p> <p>In terms of local benefits criteria 6, 8 and 10 of Policy JPA16 Cowlshaw require development on the site to deliver multi-functional green infrastructure; retain and enhance the biodiversity within the site; provide for new and/or the improvement of existing open space, sport and recreation facilities</p> <p>In addition to which, in terms of the site contributing to local housing need paragraph 11.182 of JPA16 states that whilst a significant proportion of Oldham's housing land will come from the urban area through maximising</p>	CPRE

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		the use of brownfield land, it is considered that the site will help to diversify the existing housing stock in the area and boroughwide. The site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available. No changes are considered necessary.	
JPA16.30	There are also proposals for 400 additional homes on the old Shop Direct Mill site off Linney Lane, Shaw. This needs to be considered in the context of plans under PfE.	As set out in the Plan there is a strong focus on directing new housing towards previously-developed sites within the existing urban area. A large number of previously-developed sites suitable for housing have been identified in the council's Brownfield Register and Strategic Housing Land Availability Assessment, including the Shop Direct Site at Linney Lane (SHA2131). No changes are considered necessary.	Debbie Abrahams MP
JPA16.31	Cowlshaw can contribute to the front-loading of housing growth to address persistent under delivery of housing as outline permission has already been granted on a significant part of the allocation.	Cowlshaw is identified as coming forward earlier in the plan period, with the first phase of housing expected to be delivered in 2023/24, reflecting the recent planning permission (which is now under construction) and the pre-application at Denbigh Drive. No changes are considered necessary.	See Appendix
JPA16.32	Outline consent has been granted and a reserved matters application is being progressed. Requirement for design code therefore questioned and revised wording suggested.	Whilst it is acknowledged that part of the site has planning permission it is still considered appropriate for Policy JPA16 to require any development to be in accordance with a masterplan and Design Code for the site, agreed by the local planning authority. This is to ensure that the remainder of the site comes forward in a comprehensive and that the site as whole meets the requirements set out within Policy JPA16. No changes are considered necessary.	Mr J Fitton and Mrs B Fitton
JPA16.33	Site provides the opportunity for a wide range of housing types and tenures at a density and character that can respond to specific housing needs of the Oldham. Suggest policy wording revised to reflect that it's a minimum.	Policy JPA16 states that development on the site will be required to deliver around 460 homes, providing a range of dwelling types and sizes so as to deliver more inclusive neighbourhoods and meet local needs, including the delivery of a mix of high-quality family housing. It is considered that this provides sufficient flexibility and no further changes are considered necessary.	Mr J Fitton and Mrs B Fitton

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JPA16.34	There should be no pre-emptive removal of the Protected Open Land (OPOL) designation of OPOL9, OPOL10 and OPOL22 which are allocated in the Greater Manchester Spatial Framework/Places for Everyone.	The site is currently designated as Other Protected Open Land (OPOL) in Oldham's Joint Core Strategy and Development Management Policies Development Plan Document (Oldham's Local Plan). Any OPOL sites will remain protected through the Local Plan until they are de-designated through the adoption of PfE. Until such a time any development would need to accord with Policy 22 of the Local Plan. No changes are considered necessary.	Paul Burns
JPA16.35	The impact on Shaw and Crompton is disproportionate.	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 <a href="#">[02.01.10]</a> . The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE. No changes are considered necessary.	Cllr Howard Sykes
	<b>Highways / Access / Traffic</b>		
JPA16.36	Not exactly close to major rail links and motorways. Site is not considered to be highly accessible.	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.  The site is in a sustainable and accessible location, on the edge of a large area of open land and in a successful and attractive neighbourhood, and connected to neighbouring communities in Low Crompton, Cowlshaw, Royton and nearby town centres, including Shaw, where there is a Metrolink stop, with frequent bus services also a feature of the site and its location. See allocation policy JP Allocation 16, for reasoned justification in relation to connectivity of site <a href="#">[publication plan]</a> .  Furthermore, Locality Assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic	See Appendix

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		<p>highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. This has informed criteria 4 and 5 of JPA16 which require development on the site to ensure high quality connections to the local highway network and any improvements that are required in order to ensure that access to the site is safe.</p> <p>Further detail is contained within the allocation topic paper <a href="#">[10.05.36]</a> and the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a>. No changes are considered necessary.</p>	
JPA16.37	There is already too much traffic congestion in this area. There should be an independent traffic and transport assessment	<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>Locality Assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within chapter 10 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>, Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>. The findings have been used to inform Policy JPA16 .</p>	See Appendix

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		Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required 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.	
JPA16.38	Cumulative impact with other proposed Green Belt release sites is anticipated to have a material impact on the highway network.	As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within the allocation topic paper <a href="#">[10.05.37]</a> and the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> . Table 2 of the Topic Paper <a href="#">[10.05.36]</a> for Cowlshaw details the necessary interventions required in order to ensure that the allocation can be accessed safely and not have a detrimental effect on the existing Key Route Network (KRN) and Strategic Route Network (SRN). No changes are considered necessary.	Dave Arnott
JPA16.39	No existing access to the site other than from Cocker Mill Lane which is the primary access for the existing industrial units in the southern parcel of the allocation but this route does not include pedestrian footpaths.	<p>The industrial units / abattoir are no longer relevant as the planning permission is under construction. However, criterion 4 of Policy JPA16 states that any development on the site will be required to provide for appropriate access points to and from the site in liaison with the local highway authority, which will include pedestrian footpaths, in order for them to be adopted by the local highway authority.</p> <p>As stated at criterion 4, the main points of access to the site will be Cocker Mill Lane to the southern part of the site, with an emergency/controlled secondary access to Cowlshaw, Kings Road to the central part of the site that lies to the north of Cowlshaw Farm and Denbigh Drive, with access limited to the small parcel at the north only. Criterion 5 also states that development on the site will be required to take account of and deliver any other highway improvements that may be needed to</p>	Save Greater Manchester Green Belt

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		<p>minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities. No changes are considered necessary.</p>	
JPA16.40	<p>Future access is anticipated to include Cocker Mill Lane to the south, Kings Road/Moor Street to the east, and Denbigh Drive to the north but more work is required to ascertain whether the potential access points are functionally capable of facilitating the volume of traffic.</p>	<p>Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required 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. No changes are considered necessary.</p>	Save Greater Manchester Green Belt
JPA16.41	<p>More work needs to be done to ascertain whether there is a realistic opportunity to provide access to all of the site due to constraints in ownership (having implications for the routing of vehicle movements) and existing road widths, as well as mitigation</p>	<p>As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Further detail on the sites access arrangements is contained within the allocation topic paper <a href="#">[10.05.36, chapter 10]</a> and the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a>.</p> <p>Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required 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. No changes are considered necessary. No changes are considered necessary.</p>	Save Greater Manchester Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA16.42	Access arrangements are unsatisfactory.	Criterion 4 of Policy JPA16 has been informed by the findings of the Locality Assessment work and conclusions regarding suitable access. Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required 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. No changes are considered necessary.	Cllr Howard Sykes
JPA16.43	Land which backs onto Edward Rd and Denbigh Drive is private land and doesn't belong to or have any jurisdiction under Oldham Council or the farmers land in the lower field and should have never have been added to your planning proposal.	Inclusion of this land within the redline does not mean it would be developed if it is not available. Indeed, the Indicative Concept Plan and Report [ <a href="#">10.05.20</a> and <a href="#">10.05.21</a> ] show this land as being retained and as such has not been taken into account when calculating the developable area and capacity. No changes are considered necessary.	John McAllister
JPA16.44	Additional traffic will add road safety danger for school children.	Criterion 4 of Policy JPA16 has been informed by the findings of the Locality Assessment work and conclusions regarding suitable access. Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required 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. No changes are considered necessary.	Debbie Abrahams MP
JPA16.45	Main point of access for the approved Phase 1 application is Cocker Mill Lane. Technical highways work carried out to demonstrate the whole allocation can be adequately accessed.	A main point of access has been agreed for the Phase 1 application which is now being implemented. However, further transport assessment work would be required to inform subsequent planning applications for the remainder of the site, which will also have to meet the requirements set out in Policy JPA 16. No changes are considered necessary.	Avison Young

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA16.46	Committed to providing highway improvements works if necessary, for future development on the remainder of the site. Further consideration of the requirement and delivery of these mitigation measures needed.	<p>Criterion 4 and 5 of Policy JPA 16 states that any development brought forward as part of the allocation will be required to:</p> <p>Provide for appropriate access points to and from the site in liaison with the local highway authority. The main points of access to the site will be Cocker Mill Lane to the southern part of the site, with an emergency/controlled secondary access to Cowlshaw, Kings Road to the central part of the site that lies to the north of Cowlshaw Farm and Denbigh Drive, with access limited to the small parcel at the north only; and</p> <p>Take account of and deliver any other highway improvements that may be needed to</p> <p>minimise the impact of associated traffic on the local highway network and improve</p> <p>accessibility to the surrounding area, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities.</p> <p>Furthermore, Policy JP-C7 Transport Requirements of New Development sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate. No changes are considered necessary.</p>	Avison Young
JPA16.47	Topography makes it difficult to envisage an elegant access solution.	With regards to creating an access solution, criterion 1 of Policy JPA16 requires any development on the site to be in accordance with a comprehensive masterplan and Design Code agreed by the local authority. This is also a matter of detail that will be dealt with via any detailed planning application submitted as part of the allocation. Indeed, access has already been designed as part of the recently approved planning application. No changes are considered necessary.	Cllr Howard Sykes
Policy JPA16.48	Limited capacity at Shaw, welcome new stop at Broadbent Moss (Cop Road) but more stops are needed online and better access. Shaw needs more capacity - bigger car park	As the Park and Ride scheme at Broadbent Moss develops, the capacity of any car parking and access via active travel modes and public transport will be determined in accordance with TfGM requirements.	Cllr Howard Sykes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>The development of the stop at Cop Road is in accordance with the Local Authorities and TfGM priorities, which 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 <a href="#">09.01.01</a> GM Transport Strategy 2040 and <a href="#">09.01.02</a> GM Transport Strategy Our Five Year Delivery Plan 2021-2026. No changes are considered necessary.</p>	
	<b>Infrastructure</b>		
JPA16.49	<p>Waiting times in hospitals are too long and there are not enough places in schools. There is not enough policing and crime levels are too high.</p> <p>More houses will put extra pressure on local services.</p> <p>The proposal to 'contribute' to the provision of school places and 'appropriate' health and community facilities is weak and unconvincing.</p> <p>Lack of facilities in Shaw whilst Royton has had new facilities.</p> <p>Waiting times in hospitals are too long and there are not enough places in schools. There is not enough policing and crime levels are too high.</p> <p>Strategic allocations are too close to each other, which would place a huge burden on infrastructure.</p>	<p>Paragraph 11.189 of Policy JPA16 Cowlshaw recognises the importance of ensuring that any development proposed does not place undue pressure on existing infrastructure and that account is taken of the increased demand it may place on existing provision. As such therefore a number of criteria included in JPA14 that seek to ensure appropriate infrastructure is provided. No changes are considered necessary.</p> <p>Furthermore, there are also a number of policies in the <a href="#">Publication Plan</a> that seek to address this matter, such as policies JP-G6 Urban Green Space; JP-P5 Education, Skills and Knowledge; and JP-P6 Health; JP-P7 Sport and Recreation. Supporting these are the overarching policies of Policy JP-P1 Sustainable Places, which sets out key attributes that all development, wherever appropriate, should be consistent with including being supported by critical infrastructure, such as energy, water and drainage and green spaces; and Policy JP-D2 on Developer Contributions.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>In addition, Oldham Council has recently published an <a href="#">Education Contribution Interim Planning Paper</a>, which sets out how the Council will deal with education contributions for the borough when determining planning applications for relevant developments that may impact on education provision, such as school places. It was adopted at Cabinet on 20 September 2021.</p>	
JPA16.50	<p>Strategic allocations are too close to each other, which would place a huge burden on infrastructure.</p>	<p>As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate. Further detail is contained within chapter 10 of the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>, Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11]</a> and Transport Locality Assessment Addendum – Oldham <a href="#">[09.01.23]</a>.</p> <p>Paragraph 11.189 of Policy JPA16 Cowlshaw recognises the importance of ensuring that any development proposed does not place undue pressure on existing infrastructure and that account is taken of the increased demand it may place on existing provision. As such therefore a number of criteria included in JPA14 that seek to ensure appropriate infrastructure is provided. No changes are considered necessary. No changes are considered necessary.</p>	Debbie Abrahams MP
JPA16.51	<p>Appropriate contributions to support any improvements required to local services and infrastructure (including schools, health etc) as a result of the development will be determined with Oldham Council.</p>	<p>Policy JPA16 Cowlshaw and its criteria, in particular – 10, 11 and 12, and paragraph 11.189 of the RJ states that these would need to be provided in line with local planning policy requirements and in liaison with the local authority.</p> <p>In addition, Policy JP-D2 Developer Contributions states that developers will be required to provide, or contribute towards, the provision of mitigation measures to make the development acceptable in planning terms. No changes are considered necessary.</p>	Avison Young
	<b>Flood Risk</b>		

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA16.52	<p>Request for independent flood risk assessment.</p> <p>There are existing severe surface water and sewerage issues with this area.</p> <p>New sewers piggy backing onto old Victorian sewers can't cope.</p>	<p>A Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> has been carried out for Cowlshaw. An overview of flood risk and the Irwell Catchment Opportunities for each allocation parcel is provided below. A summary of the findings can be found in the Cowlshaw Topic Paper <a href="#">[10.05.36]</a>. Following further assessment the exceptions test was not required. Further details can also be found in the Flood Risk Sequential Test and Exception Test Evidence Paper <a href="#">[04.02.20]</a>.</p> <p>Informed by the findings of the SFRA, criterion 14 of Policy JPA16 Cowlshaw states that development will be required to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Natural sustainable drainage systems should be, integrated as part of the multi-functional green infrastructure network and delivered in line with the GM Level 1 SFRA advice. Opportunities to use natural flood management and highway SUD's features should be explored.</p> <p>Furthermore, Policy JP-S5 Flood Risk and the Water Environment sets out an integrated catchment approach to protect the quantity and quality of water bodies and managing flood risk.</p> <p>No changes are considered necessary.</p>	See Appendix
JPA16.53	<p>Development proposals will be informed by appropriate technical assessment including heritage and archaeological assessment, as well as flood risk to assess impacts and identify the need for any mitigation as required.</p>	<p>Criterion 13 of Policy JPA16 Cowlshaw, requires development to be in accordance with a submitted Heritage Impact Assessment and Historic Environment Assessment. Additionally, criterion 14 of Policy JPA16 Cowlshaw states that development will be required to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. No changes are considered necessary.</p>	Avison Young

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<b>Land Contamination</b>		
JPA16.54	A phase 1 & 2 contamination report would be required with any future development proposals.	<p>Policy JP-S1 'Sustainable Development' sets out a series of in bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively (PfE Publication Plan 2021, page 82).</p> <p>At this current stage, we are not aware of any significant land contamination issues associated with the site. However, as noted above and within the site allocation policy, phase 1 &amp; 2 Site Investigation reports will be required as part of any submissions for determination on the allocation.</p>	Save Greater Manchester Green Belt
	<b>Ecology</b>		
JPA16.55	<p>No detailed assessment of protected species habitats has been undertaken and this is recommended as part of any future development proposal.</p> <p>The presence of protected species not having yet been assessed in sufficient detail to justify releasing the land for development.</p>	<p>As set out in the allocation topic paper <a href="#">[10.05.36]</a>, a Preliminary Ecological Appraisal 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. The allocation policy sets out that any development of the site is required to provide further surveys on amphibians, extended phase 1 habitats, badgers and bats to inform any planning application. Therefore, it is considered that a sufficient evidence base has been prepared to support allocation through the Plan, with further evidence required at planning application stage as detailed in the allocation policy. See the full allocation policy JP Allocation 16 for further detail.</p> <p>Criterion 8 of policy JPA 16 specifically refers to the Cowlshaw Ponds SBI and requires new development to retain and enhance the hierarchy of biodiversity within the site, notably the existing Cowlshaw Ponds SBI and the area of priority habitat to the south of Crompton Primary School,</p>	See Appendix

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment;</p> <p>Further details are provided in the reasoned justification at paragraph 11.186 which state that Cowlshaw Ponds SBI is made up of three pond areas and there is an additional priority habitat to the south of Crompton Primary School. Any development will need to retain and enhance these, incorporating them as a key feature within the green infrastructure network and landscaping proposals for the site. No changes are considered necessary.</p>	
JPA16.56	<p>There needs to be more adequate assessment of flora and fauna to understand amphibians, bats and other wildlife, such as known important farmland birds.</p> <p>Loss of flora and fauna onsite</p>	<p>A Preliminary Ecological Appraisal 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. The allocation policy states that development of the site is required to: retain and enhance the hierarchy of biodiversity within the site, notably areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network; and provide further surveys on amphibians, extended phase 1 habitats, badgers and bats to inform any planning application. See the full allocation policy JP Allocation 16 for further detail. No changes are considered necessary.</p>	<p>CPRE</p> <p>Cllr Howard Sykes</p>
JPA16.57	<p>Illustrative Masterplan has been designed to take into account the requirement to retain, protect and enhance the Cowlshaw Ponds SBI, other landscape features, woodland and areas of biodiversity. Further surveys will be carried out as necessary</p>	<p>Criterion 8 of policy JPA 16 specifically refers to the Cowlshaw Ponds SBI and requires new development to retain and enhance the hierarchy of biodiversity within the site, notably the existing Cowlshaw Ponds SBI and the area of priority habitat to the south of Crompton Primary School, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment.</p>	<p>Avison Young</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>Criterion 9 also states that development on the site will be required to provide further surveys on amphibians (including great crested newts), extended phase 1 habitat, breeding birds, badgers and bats to inform any planning application.</p> <p>Further details are provided in the reasoned justification at paragraph 11.186 which state that Cowlshaw Ponds SBI is made up of three pond areas and there is an additional priority habitat to the south of Crompton Primary School. Any development will need to retain and enhance these, incorporating them as a key feature within the green infrastructure network and landscaping proposals for the site. No changes are considered necessary.</p>	
JPA16.58	SBI should be retained	Please see response at Row JPA16.57.	Cllr Howard Sykes
	<b>Heritage</b>		
JPA16.59	Potential for preservation of paleo-environmental evidence and the impact of any development on the setting of nearby heritage assets will need to be taken into account.	<p>An initial Historic Environment Assessment Screening Exercise prepared by Greater Manchester Archaeology Advisory Service (GMAAS) in June 2019, recommended that Cowlshaw be screened in for further assessment. It identified that although there are no designated heritage assets contained within the land allocation, there is one located further afield that have concerns over visual impacts and/or effects on their setting (Holy Trinity Church). There is potential for pre-historic remains on the favourable geological areas and these lie close to the river Irk. There is also potential for Post-Medieval settlement evidence at Cowlshaw as well as potential early 19th century farms.</p> <p>Criterion 13 of Policy JPA 16 requires any development on the site to be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based</p>	Save Greater Manchester Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>assessment to determine if any future evaluation and mitigation will be needed.</p> <p>Furthermore, Policy JP-P2 Heritage states that development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets. No changes are considered necessary.</p>	
JPA16.60	<p>Development proposals will be informed by appropriate technical assessment including heritage and archaeological assessment, as well as flood risk to assess impacts and identify the need for any mitigation as required.</p>	<p>Criterion 13 of Policy JPA16 requires any development on the site to be informed by the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.</p> <p>Furthermore, Policy JP-P2 Heritage states that development proposals should identify assets of archaeological interest and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.</p> <p>Criterion 14 of Policy JPA16 requires any development to be informed by an appropriate flood risk assessment and a comprehensive drainage</p>	Avison Young

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		strategy which includes a full investigation of the surface water hierarchy. No changes are considered necessary.	
	<b>Viability</b>		
PA16.61	Deliverability - Not known although the initial viability assessment indicated that development would not be viable and would only become viable with an uplift in anticipated unit values.	Viability of the proposed site allocation has been assessed. Details of the Viability Assessment is contained within the allocation topic paper <a href="#">[10.05.36]</a> .  In terms of the site and it's deliverability, this is also demonstrated by the submission of and approval of an outline planning application ( <a href="#">PA/344179/19</a> ) and a subsequent reserved matters approval ( <a href="#">RES/346720/21</a> ) at the southern end of the allocation and another application ( <a href="#">FUL/346529/21</a> ) for the northern parcel, accessed via Denbigh Drive. No changes are considered necessary.	Save Greater Manchester Green Belt  PD Northern Trust Asset Management
	<b>Minerals</b>		
JPA16.62	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore, it is not necessary to identify them on the PfE policies map and no change is necessary.	Minerals Planning Association
	<b>Affordable Housing</b>		
JPA16.63	Affordable housing policy should be amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.	The approach taken in PfE is appropriate and consistent with NPPF. It is considered that detailed affordable housing targets are most appropriately set at the local level, through Local Plans, whilst ensuring that they contribute to the overall ambition of PfE and Policy JP-H2 Affordability of New Housing. No changes are considered necessary.	Save Shaw's Green Belt
JPA16.64	Agree with requirement for affordable homes.	As per policy JPA16, any development on the allocation will be required to provide affordable housing in line with local requirements.	Avison Young
	<b>Open Space / Protected Land</b>		
JPA16.65	There is a substantial portion of the proposed allocation that would be set aside for green infrastructure / mitigation (approximately 19ha of the 32ha	Policy JP Allocation 16 requires development on the site to deliver multi-functional green infrastructure (incorporating the retention and	Save Shaw's Green Belt

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	site). What measures would be in place to protect this land from future development.	enhancement of existing public rights of way) and high-quality landscaping within the site so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation; and provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements. See the Cowlshaw Allocation Topic Paper for further detail in regards to green space [10.05.36]. No changes are considered necessary.	
JPA16.66	Open space is to be delivered in accordance with Policy for the first phase of development on this allocation. Same principles will be applied for future development.	Please see response at Row JPA16.65.	Avison Young
	<b>Consultation</b>		
JPA16.67	People can make comments but the chances of them being listened to are remote, there were hundreds of objections to this application, many on very sound grounds. Oldham will just continue to blunder on.	Comment noted. PfE has been developed in accordance with the statutory plan making guidance contained within <a href="#">The Town and Country Planning (Local Planning) (England) Regulations 2012</a> and where necessary in accordance with <a href="#">Oldham's Statement of Community Involvement</a> .	John Shepherd
	<b>Air Quality</b>		
JPA16.68	Concerns regards air pollution. Air quality already dangerous. Increased traffic will add to this.	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. See the allocation topic paper for further detail in regards to air quality [10.05.36, chapter 21]. When read as a whole the plan is considered sufficient to deal with issues arising from air pollution. No changes are considered necessary.	See Appendix
	<b>Landscape / Green Infrastructure</b>		
JPA16.69	Tree buffers would reduce visual impact.	Please see response at Row JPA16.65.	Jim McMahon MP

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Green Buffer Zone should be created between allocation site and existing developments, in order to lessen impact on neighbouring properties		
JPA16.70	Multi-functional green infrastructure has been achieved as part of the Phase 1 application. Illustrative Plan submitted shows how this can be achieved for the allocation as a whole.	Please see response at Row JPA16.65.  In addition, criterion 1 of Policy JPA16 requires development on the site to be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority. This is to ensure that site comes forward in a comprehensive and that the policy requirements of JPA16 are met.	Avison Young
JPA16.71	Illustrative masterplan work undertaken to date is based on enhancing the existing landscape features etc. The existing footpath network within the site will be enhanced to encourage walking and cycling.	Please see response at Row JPA16.65.  In addition, criterion 1 of Policy JPA16 requires development on the site to be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority. This is to ensure that site comes forward in a comprehensive and that the policy requirements of JPA16 are met.	Avison Young
JPA16.72	Site includes PROWs which link to key walks - Shaw and Crompton Beating of the Bounds and Crompton Circuit and one of few sites for horse riding	Please see response at Row JPA16.65.  In addition, criterion 1 of Policy JPA16 requires development on the site to be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority. This is to ensure that site comes forward in a comprehensive and that the policy requirements of JPA16 are met. Whilst, criterion 5 requires development to take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities.	Cllr Howard Sykes
JPA16.73	Loss of attractive open spaces which provide recreation	Please response at Row JPA16.65.	Cllr Howard Sykes

## PfE 2021 Policy JP Allocation 17 – Land south of Coal Pit Lane (Ashton Road)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<b>Principle of Development/ Use of Green Belt</b>		
JPA 17.1	<p>Build on brownfield sites first before considering developing the Green Belt. Building on Green Belt destroys habitats and people’s recreational enjoyment of those spaces. Trying to bring back nature to tackle climate change and this is just contributing to its destruction.</p> <p>Green Belt function is to check the unrestricted sprawl of large built-up areas – this flies in the face of it. Change the focus to brownfield sites.</p> <p>Use of brownfield land is commendable, taking Green Belt is not. Following Brexit the green belt should be bought back into full production, alongside provision for wildlife and recreation.</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 <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p> <p>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 <a href="#">[05.01.03]</a>.</p>	See Appendix.
JPA 17.2	<p>Not consistent with NPPF because the case for exceptional circumstances under Site Selection Criterion 7 mostly lack merit, and in some instances are counter-intuitive and even contradictory. Criterion 7 does not support the strategic objectives so what makes it an exceptional circumstance? Being asked to simply accept the premise that a local benefit is automatically an exceptional circumstance, but no evidence or justification is presented to that effect.</p> <p>No exceptional circumstances shown to allow removal of Green Belt or green spaces. Site serves Green Belt purpose and development would lead to urban sprawl and encroachment.</p>	<p>The Site Selection Background Paper <a href="#">[03.04.01]</a> and the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> provides information on the methodology for selecting the strategic allocations/ growth areas. Criterion 7 relates to sites which can demonstrate direct link(s) to addressing a specific local need. The allocation demonstrates this as is set out in the policy’s supporting text [para. 11.193, page 300] which states that “the site has the potential to meet local housing need in the immediate vicinity and across the borough, and contribute to and enhance the housing mix within the area, through adding to the type and range of housing available”, as such it is considered to meet a local housing need and diversify the housing mix in the area. Further detail on the site’s selection is contained within the allocation topic paper <a href="#">[10.05.37]</a> chapter 5, pages 12-14].</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<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 strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a></p> <p>Furthermore, the allocation policy point 11 [page 299 of the Plan] sets out that development of the site is required to “have regard to the findings of the Stage 2 Greater Manchester Green Belt Study <a href="#">[07.01.07, 07.01.08]</a>, including mitigation measures to mitigate harm to the Green Belt”. Therefore, it is considered that appropriate mitigation has been prepared to support the allocation in terms of exceptional circumstances and impact on the Green Belt.</p>	
JPA 17.3	<p>In relation to site selection methodology it is not clear how information gleaned at stages 2, 3 and 4 and draft allocations have been bridged. Site allocations have been selected first and then certain planning constraints assessed. This leads to an unjustified approach. The 2019 GMSF proposed Ashton Road Corridor (11.5 ha) which resulted in ‘Moderate-High’ harm, the 2021 revised boundary at Land South of Coal Pit Lane (19.8ha) resulted in ‘High’ harm. It is not clear why GMCA has chosen to pursue the release of a site with high Green Belt harm. There is no indication other sites have been considered with a lower level of Green Belt harm. This is a fundamental flaw.</p>	<p>The site selection paper <a href="#">[03.04.01]</a> sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>In terms of Green Belt harm, the allocation topic paper sets out that since the Green Belt assessment was prepared the allocation boundary has been reduced by 6.52ha along the western boundary as some mitigation to the impact on the Green Belt <a href="#">[10.05.37, chapter 14 ‘Green Belt Assessment’, para.14.3 page 39]</a>. Also, the allocation policy point 11 [page 299 of the Plan] sets out mitigation measures to mitigate harm to the Green Belt. As such it is considered that appropriate evidence/ mitigation has been prepared to support the allocation and address Green Belt harm.</p>	Chasten Holdings Ltd
JPA 17.4	<p>Given the constraints, a 30% reduction (549 dwelling) should be built into the supply assessment from these sites (including Land south of Coal Pit Lane). The site was not allocated within the 2016 GMSF and was not considered suitable. There are a number of historic landfills on site and a large proportion of the site is contaminated so detailed Phase 1 and Phase 2 Intrusive Site</p>	<p>It is considered that an appropriate evidence base has been prepared to support the allocation. Evidence in relation to the site selection process is set out within the Site Selection Background Paper <a href="#">[03.04.01]</a>.</p> <p>The <a href="#">high-level indicative concept plan report</a> indicates that there are a number of historic landfill sites within the allocation. This has informed the allocation policy</p>	PD Northern Trust Asset Management

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	Investigation reports will be required. At this stage, there is no understanding as to what would be required, how long this would take and how much this would cost. Further investigations are needed to understand the extent of the issue and how much this would cost and deliverability questioned. To ensure that Oldham can provide the level of housing required, P&D recommend that additional sites are allocated which can be delivered immediately, such as this site (north of Woodhouses).	<p>point 18 [page 300 of the Plan] which requires development of the site to incorporate necessary remediation measures in areas which are affected by contamination and have been previously worked for landfill purposes. Point 16, [page 299 of the Plan] also requires any application to provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.</p> <p>The allocation topic paper <a href="#">[10.05.37]</a> provides a full summary of the background work and evidence undertaken to inform and support the allocation, including an assessment of deliverability (see section E). A strategic viability assessment <a href="#">[03.01.04, pages 84-86]</a>, has been published alongside the PfE Plan which assesses the viability of the allocations. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>	
JPA 17.5	Client's site previously included in this wider allocation – the land off Bardsley Vale Avenue. To provide greater choice and deliver affordable housing it should be added back in. Consider there is a realistic prospect that many of the proposed allocations currently proposed will not deliver the quantum of housing envisaged within the life-span of plan (reasons for each one listed) and this site is capable of early delivery, is well associated with the settlement edge and its release is supported by the Green Belt Assessment.	<p>Land off Bardsley Vale Avenue previously formed part of the Ashton Road allocation (along with land south of Coal Pit Lane) in the 2019 draft Plan. It has since been removed for reasons set out within the Omission document (Oldham Omitted Sites Document, row 39).</p> <p>In relation to comments made regarding allocation delivery within the plan period, it is considered that an appropriate evidence base has been prepared to support the allocations identified within the Plan. The delivery rates, based on recent evidence, demonstrate that the majority of the allocations are deliverable within the plan period. Details of the housing land supply and delivery can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>.</p>	Sophia Flemming Consulting Ltd
	<b>General</b>		
17.6	Policy unsound - no specific comments provided.	Noted.	See Appendix.
JPA 17.7	Unsustainable.	The Sustainable Development policy (JP-S 1) sets out specific policies to achieve sustainable development, including measures in relation to supporting	Vicky Harper

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		<p>infrastructure and biodiversity [see pages 82-83 of the Publication Plan for the full policy].</p> <p>Paragraph 11.195 of the allocation supporting text [<a href="#">publication plan, pages 300-301</a>, para.11.195] sets out that the site has good access to public transport and a range of local services, with access to a number of bus routes. TfGM have also identified the A627/A671 corridor between Rochdale – Oldham – Ashton within the first tranche of the ‘Streets for All’ corridor studies to improve connectivity on Greater Manchester’s Key Route Network. These corridors have been identified on the basis of their potential to support a range of GM agendas, around delivering modal shift (particularly to public transport, walking and cycling), improving air quality and regenerating local centres. Any development would therefore be required to enhance links to and from the site to the bus network, to encourage sustainable modes of travel and maximise the site's accessibility, developing the existing recreation routes and Public Right of Way network.</p>	
JPA 17.8	Permission has been granted for so many HMOs in the area, there is a risk that families will move out of the area, house prices will fall & the estate is likely to become a haven for anti-social behaviour.	<p>Comment does not directly relate to the allocation.</p> <p>The allocation supporting text [paragraph , sets out that the site has the potential to meet local housing need in the immediate vicinity and across the borough, and contribute to and enhance the housing mix within the area, through adding to the type and range of housing available [para. 11.193. page 300].</p>	Dawn Lomas
JPA 17.9	The people of Greater Manchester will lose all faith in the "representative" leadership as this goes against all that we thought our councils stood for.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations.	Robert Mayall
JPA 17.10	This process is being driven by greed and corrupt politicians.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations.	See Appendix.
JPA 17.11	Breach of promises made when moved here, were assured that the surrounding land could not be built upon.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations. The Site Selection Background Paper [ <a href="#">03.04.01</a> ] and the Growth and Spatial Options Paper [ <a href="#">02.01.10</a> ] provides information on the methodology for selecting the strategic allocations/ growth areas.	Louise Rathbone

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JPA 17.12	Would like to see more investment in the housing stock we already have.	<p>Paragraph 7.11 of the <a href="#">Publication Plan</a>, recognises the role of the existing housing stock and that it will be important to make the most out of it.) Efforts will be made to further reduce long-term vacancies, including by seeking Government funding and working with property owners, but any significant further reduction in vacancies could begin to make it more difficult for people to move home. Consequently, it has not been assumed that a reduction in vacancies will help to meet the overall housing requirement. In any event, Government guidance is clear that empty properties brought back into use can only be counted as contributing to housing supply and completions if they have not already been counted as part of the existing stock.</p> <p>In addition there are council programmes that support the investment in housing stock such as <a href="#">Warm Homes Oldham</a> and <a href="#">Empty Homes</a>.</p>	Lynne Hastings
JPA 17.13	Councils should assist in helping people purchase first homes instead of selling off green belt land.	<p>At Chapter 6 (Paragraph 6.87) of the Housing Topic Paper <a href="#">[06.01.03]</a> it is clarified that a key part of the overall strategy is to maximise the amount of development on brownfield sites in the most accessible locations, and minimise the loss of greenfield and Green Belt land as far as possible. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. See Growth and Spatial Options Paper <a href="#">[02.01.10]</a> for further information. Delivering a mix of housing, including affordable housing, is central to the PfE strategy, as is set out within Chapter 7 of the Plan.</p> <p>The Delivering the Plan chapter of the <a href="#">Publication Plan</a> sets out our approach to implementation and delivery, recognising that the level of growth proposed (across the plan as a whole) will require substantial amounts of investment from both the public and the private sector. It will be important that the Plan is supported by sources of funding and delivery mechanisms. However, many of the necessary</p>	Lynne Hastings

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		actions lie outside its scope and will be taken forward through other strategies, plans and programmes.	
JPA 17.14	No affordable or eco homes.	Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policy states that development will be required to “provide for affordable homes in line with local planning policy requirements”. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.  In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Specifically, policy JP-S 2 ‘Carbon and Energy’ includes measures related to energy efficiency within homes.	See Appendix.
JPA 17.15	Supportive of 175 high quality family homes, we recognise there is a lot of affordable housing locally and therefore whilst affordable housing is key there is an opportunity to vary the tenure and type of accommodation.	It is recognised that the site provides the opportunity to vary the housing mix in the area [see paragraph 11.193 of the Plan]. Point 2 of the allocation policy [page 299 of the Plan] requires development of the site to provide a range of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing.	Greater Manchester Housing Providers
JPA 17.16	The additional housing and warehousing exceed the governments predicted requirements of the area. There is already sufficient homes available in the area for all budgets.	Further evidence has been produced in relation to the housing needs and employment land demand over the life time of the plan period. It is appropriate for the overall land supply targets set out within the plan (tables 6.1 and 6.2) to be based on the housing and employment land need figures, derived from the evidence base. The Housing Topic Paper [06.01.03] sets out the methodology for calculating housing need; and the Employment Topic Paper [05.01.04] for employment need.	See Appendix.
	<b>Land stability/ contamination/ flood risk</b>		
JPA 17.17	Land is too boggy to build on which would cause unstable homes and be prone to flooding which could also cause disruption to nearby farms.	Policy JP-S1 ‘Sustainable Development’ sets out a series of measures for bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively ( <a href="#">Publication Plan</a> , page 82).	See Appendix.

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		<p>A Strategic Flood Risk Assessment (SFRA) <a href="#">[04.02.01]</a> has been carried out to inform the PfE and the proposed strategic allocations, including Land south of Coal Pit Lane. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording. The allocation policy [point 17, page 300 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site. As such it is considered that the policy requirements, informed by the supporting evidence, are sufficient to ensure flood risk is considered and mitigated as part of the development of the site.</p>	
JPA 17.18	<p>Wording amendments suggested to the criteria on flood risk assessment including surface water management and using natural flood management and highways SUDs.</p>	<p>Point 17 of the allocation policy [page 300 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site, including requiring a flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. It also states that development should incorporate sustainable drainage systems, in line with the evidence. In addition, the allocation policy supporting text [para. 11.202, page 301] sets out further detail in relation to flood risk requirements. It is considered that the policy requirements ensure flood risk will be dealt with accordingly as part of the development. As such when read as a whole no change is considered necessary.</p>	United Utilities
	<b>Highways/ access/ transport</b>		
JPA 17.19	<p>This site is not close to any major rail links or motorways, how does it address climate change, help reduce emissions and congestion. Long distance to motorway connections, access by vehicle to Manchester on already congested roads.</p>	<p>The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The site was also subject to assessment as part of the Strategic Environmental Assessment <a href="#">[02.01.02]</a> within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.</p> <p>Policy JP-C 1 'An Integrated Network' also 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>It is considered that the site is well positioned, in a sustainable and accessible location and with good connectivity to the wider strategic highway network. This is</p>	See Appendix.

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		<p>justified in the allocation policy supporting text [<a href="#">publication plan, pages 300-301</a>, para.11.195].</p> <p>Locality assessments have been carried out to consider access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). Further detail is contained within the allocation topic paper [<a href="#">10.05.37</a>, chapter 10, pages 19-32] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix G]. The locality assessment has informed the allocation policy wording – points 4 and 5 [see page 299 of the Plan for full policy requirements] – which require development of the site to provide appropriate access and minimise the impact of associated traffic on surrounding area. As such it is considered that appropriate mitigation is set out within the allocation policy to address highway and access issues with development of the allocation.</p>	
JPA 17.20	<p>Dangerous access at Coal Pit Lane (especially for pedestrians due to lack of footpath); Ashton Road is already very busy; allocation will cause traffic generation; and lack of parking and space for loading and turning.</p> <p>Concerns over impact on local traffic on Ashton Road and Coal Pit Lane - however believe that access road would be via Ashton Road and may not directly increase traffic on Coal Pit Lane.</p>	<p>Locality assessments have been carried out to consider access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. See the allocation topic paper [<a href="#">10.05.37</a>, chapter 10, pages 19-32] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix G].</p> <p>In relation to Coal Pit Lane, the proposed site access onto Coal Pit Lane has been designed to integrate standard width footpaths between the proposed access and the wider road network at White Bank Road, providing suitable non-vehicular access to Failsworth and other local destinations. Regarding traffic issues at Ashton Road, the assessments consider that an additional access at Coal Pit Lane</p>	See Appendix.

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		<p>will assist in alleviating traffic impacts on Ashton Road. Further interventions to support access and highway impact of the allocation are set out within Table 2, page 26 of the allocation topic paper</p> <p>The locality assessment has informed the allocation policy wording – points 4 and 5 [see page 299 of the Plan for full policy requirements] – which require development of the site to provide appropriate access and minimise the impact of associated traffic on surrounding area. As such it is considered that appropriate mitigation is set out within the allocation policy to address highway and access issues with development of the allocation.</p>	
JPA 17.21	Assume house buyers will be commuters as we do not have local employment capacity to support perceived incomes.	<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>It is considered that the site is well positioned, in a sustainable and accessible location and with good connectivity to the wider strategic highway network – full justification to this is provided in the allocation policy supporting text [see paragraph 11.195, page 300 of the Plan]. Further detail on the proposed highway and access mitigation is contained within the allocation topic paper [chapter 10, pages 19-32 and table 2, page 26 of the allocation topic paper <a href="#">10.05.37</a>] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix G]. As such it is considered that appropriate mitigation is set out within the allocation policy to address highway and access issues with development of the allocation.</p>	Lynne Hastings
JPA 17.22	The aspiration for a road link between Ashton Road and Hollinwood needs to be carefully considered as it will sever the site and may result in a reduction in the land values. It will also add significant delivery costs. The council and the landowner need to agree at masterplanning stage the level of private and public funding needed for the road scheme.	It is noted within the allocation topic paper that the site access arrangement has been developed to illustrate that there is a practical option for site access in this location and to develop indicative cost estimations. It states that the potential deliverability of the spine road will need to be considered at the detailed planning stage, as well as whether the costs of this scheme are to be allocated to the site developer. It also sets out an alternative option if the longer-term aspiration of the	Trustee of Mrs E Bissill

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		spine road does not come forward [ <a href="#">10.05.37</a> , chapter 10, pages 21-22] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [ <a href="#">09.01.11</a> , Appendix G]. As such, further detailed consideration would be required at the time of a planning application to ensure development of an option suitable for all users, as is required under points 4 and 5 of the allocation policy. As such it is considered that this is not an issue of soundness and can be dealt with at further detailed masterplanning or planning application stages.	
	<b>Air Quality</b>		
JPA 17.23	Air pollution.	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. See the allocation topic paper for further detail in regards to air quality [ <a href="#">10.05.37</a> , chapter 21, pages 52-53]. When read as a whole the plan is considered sufficient to deal with issues arising from air pollution.	Vicky Harper
	<b>Loss of/ Impact on green space/ biodiversity/ ecology</b>		
JPA 17.24	Loss of green space/ recreational area used to walk dogs/ walk during lockdown. Important Green Infrastructure would be lost if site is developed.	Points 6 and 10 of the allocation policy [page 299 of the Plan] sets out development requirements for the allocation in relation to ensuring the allocation and surrounding area is supported by enhanced green infrastructure and open space and recreation provision. See the allocation topic paper for further detail in regards to green space [ <a href="#">10.05.37</a> , chapters 15 ‘Green Infrastructure’ and 16 ‘Recreation’, pages 43-45]. As such, it is considered that appropriate measures are contained within the allocation policy to address impact on green infrastructure and recreation.	See Appendix.
JPA 17.25	Impact on the environment - Destroying natural habitats and biodiversity, populated by a large range of wildlife (Trees, Wild Deer, Rabbits, Foxes, Bats, Frogs, Mice, Hedgehogs and a variety of different birds on this land).	A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE [ <a href="#">10.05.28</a> , <a href="#">10.05.29</a> ]. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. The findings of the appraisal are discussed within the allocation topic paper [chapter 18, pages 47-49, <a href="#">10.05.37</a> ]. This has informed the allocation policy, points 8 and 9 [page 299 or the Plan] which require development to retain and enhance biodiversity within the site, mitigate impact, provide net gain and provide further evidence at planning application stage. As such, it is considered that appropriate measures are contained within the	See Appendix.

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		allocation policy to mitigate impact on biodiversity as part of development of the allocation.	
JPA 17.26	<p>Ecological constraints need further assessment. It will be important that the design protects and enhances the existing habitat.</p> <p>Brownfield sites on former coal mining can create valuable habitat. A full ecological survey is required to identify important habitat.</p> <p>Trust welcomes policy 9 to provide further surveys on amphibians, extended Phase 1 habitats, badgers and bats to inform any planning application.</p> <p>There would be a presumption against the loss of ponds and woodland. If lost compensation would be required. It is important these areas are retained and incorporated within the development, so welcome policy clause 8 and 9.</p>	A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE [10.05.28, 10.05.29].. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. The findings of the appraisal are discussed within the allocation topic paper [chapter 18, pages 47-49, 10.05.37]. This has informed the allocation policy, points 8 and 9 [page 299 or the Plan] which require development to retain and enhance biodiversity within the site, mitigate impact, provide net gain and provide further evidence at planning application stage. Therefore, it is considered that a sufficient evidence base has been prepared to support allocation, including sufficient measures in the allocation policy with further evidence required at planning application stage as detailed in the policy, to mitigate any impacts of development of the allocation on ecology.	See Appendix.
JPA 17.27	The Trust welcomes policies to retain and enhance the hierarchy of biodiversity, notably areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network. Also, welcome sections 11.199 and 11.200 within the allocation policies.	Support noted.	The Wildlife Trusts
JPA 17.28	The Trust welcome policy clause 6 to deliver multi-functional green infrastructure and high-quality landscaping. Would add that the requirements for biodiversity and maintaining enhancing ecological linkages be added here.	Points 6 and 8 of the allocation policy [page 299 of the Plan] require development of the site to enhance GI linkages, retain and enhance biodiversity within the site, mitigate impact, provide net gain and provide further evidence at planning application stage. It also requires biodiversity to be integrated as part of the multi-functional green infrastructure network. Therefore, when the policy is read as a whole no change is considered necessary.	The Wildlife Trusts
	<b>Supporting Infrastructure</b>		
JPA 17.29	The new homes would create even more competition for local schools, doctors & other services. Canon Burrows is already massively oversubscribed.	A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-P1, JP-P5, JP-P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including	See Appendix.

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		<p>where appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>Points 13 and 14 of the allocation policy [page 299 of the Plan] requires development of the site to contribute to additional school places and health facilities to meet the increased demand that will be placed on existing provision. See the allocation topic paper for further detail on infrastructure provision [10.05.37]. In addition, Oldham Council has recently published an <a href="#">Education Contribution Interim Planning Paper</a>, which sets out how the council will deal with education contributions for the borough when determining planning applications for relevant developments that may impact on education provision, such as school places. It was adopted at Cabinet on 20 September 2021.</p>	
JPA 17.30	Suggested two additional criteria around meeting National Housing Standard for water consumption and that the proposals must have regard to the existing utility infrastructure that passes through the site.	<p>Policy JP-C 4 requires that 'new infrastructure includes provision for utilities and digital infrastructure where required'.</p> <p>Point 17 of the allocation policy [page 300 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site, including requiring a flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. It also states that development should incorporate sustainable drainage systems, in line with the evidence. In addition, the allocation policy supporting text [para. 11.202, page 301] sets out further detail in relation to flood risk requirements. As such when read as a whole no change is considered necessary.</p>	United Utilities
	<b>Support for Allocation</b>		
JPA 17.31	No comments provided. Sound boxes ticked.	Noted.	See Appendix.
JPA 17.32	Support for allocation.	Support noted.	Trustee of Mrs E Bissill
JPA 17.33	Support for allocation, recognising need to build homes for local people and welcome that Bardsley Vale has been removed.	Support noted.	Jim McMahon
	<b>Viability</b>		

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JPA 17.34	<p>There has been a reduction in the units to be provided on site, believe there are other parcels that could be used to increase the units and viability. There is a deficiency of detached homes in the area and a need for 3 &amp; 4 bed homes. It is considered that the site could accommodate more detached units than that considered appropriate in the Three Dragons Viability Assessment, which will improve the level of viability.</p> <p>Also enhancement of green infrastructure in surrounding Green Belt land up to 2km of the site, could affect the site's viability be carefully considered at the early stages of the masterplan and to ensure there's no 'double counting' in relation to offsite and onsite contributions.</p> <p>Two main concerns raised in the previous consultation - 1) no pavement on Coal Pit Lane and 2) the presence of the former pit shaft head, the presence of slag heaps and the ground being sunken which made the site unviable. Describes these as practical issues rather than objections to the principle and outlines ways in which they can be addressed.</p>	<p>A strategic viability assessment <a href="#">[03.01.04, pages 84-86]</a>, has been published alongside the PfE Plan. In relation to the site, the viability assessment concluded that with the sensitivity test applied (an increase in sales prices by 17.5%), results in a residual value of £0.8m after accounting for the strategic transport costs. As such, with the sensitivity test applied and considering that the site provides significant opportunity, especially when paired with the nearby Rosary Road site, to create a new community in an attractive location with supporting infrastructure that will also benefit the wider community and contribute to serving existing issues, it is considered that viability is possible. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>In relation to master planning, point 1 of the allocation policy [page 299 of the Plan] requires development of the site to be in accordance with a comprehensive masterplan and design code agreed by the local planning authority. As such it is considered that appropriate viability evidence has been prepared to support the allocation, however there is scope within the plan to ensure that particular master planning and viability issues can be dealt with at planning application stage.</p>	Trustee of Mrs E Bissill
JPA 17.35	<p>Land south of Coal Pit Lane is unviable and will only become viable if there was a substantial increase in house prices. Even if only marginally viable the site would only be able to deliver 10% affordable housing. The viability is likely to be worse than stated as it has assumed a standard remediation cost however this site will have substantial abnormal costs. There is no underlying robust evidence underpinning GMCA site selection process.</p> <p>No robust evidence justifying the GMCAs site selection process, it is unclear as what technical work has been undertaken into site constraints and implications for viability. Land south of Coal Pit</p>	<p>A strategic viability assessment <a href="#">[03.01.04, pages 84-86]</a>, has been published alongside the PfE Plan. In relation to the site, the viability assessment concluded that with the sensitivity test applied and considering that the site provides significant opportunity, especially when paired with the nearby Rosary Road site, to create a new community in an attractive location with supporting infrastructure that will also benefit the wider community and contribute to serving existing issues, viability is possible. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>Lane will only become viable if there was a substantial increase in house prices. Even if only marginally viable the site would only be able to deliver 10% affordable housing. The viability is likely to be worse than stated as it has assumed a standard remediation cost however this site will have substantial abnormal costs. There is no underlying robust evidence underpinning GMCA site selection process. Evidence shows the GMCA has resolved to allocate an unviable site which results in high green belt harm and remove the Spinners Way site. The approach is fundamentally flawed.</p>	<p>It is considered that an appropriate evidence base has been prepared to support the plan and the site selection process. Evidence in relation to the site selection process is set out within the the Site Selection Background Paper <a href="#">[03.04.01]</a>.</p> <p>The allocation topic paper <a href="#">[10.05.37]</a> provides a full summary of the background work and evidence undertaken to inform and support the allocation. Furthermore, supporting documents, including a high-level indicative concept plan and report <a href="#">[10.05.24, 10.05.25]</a> have been prepared for the allocation.</p> <p>In relation to Green Belt harm, point 11 of the allocation policy [page 299 of the Plan] sets out that development of the site is required to mitigate harm to the Green Belt and have regard to have regard to the findings of the Stage 2 Greater Manchester Green Belt Study <a href="#">[07.01.07, 07.01.08]</a>. Therefore, it is considered that appropriate evidence has been prepared to support the allocation in terms of exceptional circumstances and impact on the Green Belt.</p>	

## PfE 2021 Policy JP Allocation 18 – South of Rosary Road

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<b>Principle of Development/ Use of Green Belt</b>		
JPA-18.1	Policy unsound - no specific comments provided.	Noted.	See Appendix.
JPA-18.2	<p>Build on brownfield sites first before considering developing the Green Belt. Building on Green Belt destroys habitats and people's recreational enjoyment of those spaces. Trying to bring back nature to tackle climate change and this is just contributing to its destruction.</p> <p>Green Belt function is to check the unrestricted sprawl of large built-up areas – this flies in the face of it. Change the focus to brownfield sites.</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 <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a>.</p>	See Appendix.
JPA-18.3	The people of Greater Manchester will lose all faith in the "representative" leadership as this goes against all that we thought our councils stood for.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations.	Robert Mayall
JPA-18.4	This process is being driven by greed and corrupt politicians.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations.	See Appendix.
JPA-18.5	Unsustainable.	<p>The Sustainable Development policy (JP-S 1) sets out specific policies to achieve sustainable development, including measures in relation to supporting infrastructure and biodiversity [see pages 82-83 of the <a href="#">Publication Plan</a> for the full policy].</p> <p>It is considered that the site is well positioned, in a sustainable and accessible location and with good connectivity to the wider strategic highway network. The site has good access to public transport and a range of local services, with access to bus routes along Ashton Road between Tameside and Oldham. TfGM have also identified the A627/A671 corridor between Rochdale – Oldham – Ashton within the first tranche of the 'Streets for All' corridor studies to improve connectivity on</p>	Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Greater Manchester's Key Route Network. See the allocation supporting text for further information [pages 303-305 of the <a href="#">publication plan</a> ].	
JPA-18.6	No exceptional circumstances shown to allow removal of Greenbelt or Green spaces.	<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 <a href="#">[05.01.04]</a>, the details of the housing land needs and supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a>. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper <a href="#">[07.01.25]</a></p> <p>The Site Selection Background Paper <a href="#">[03.04.01]</a> and the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> provides information on the methodology for selecting the strategic allocations/ growth areas. Further detail on the site's selection is contained within the allocation topic paper <a href="#">[10.05.38, chapter 5, pages 9-11]</a>, Furthermore, each strategic allocation policy chapter within the Plan includes a reasoned justification for the allocation.</p>	See Appendix.
JPA-18.7	The additional housing and warehousing exceed the governments predicted requirements of the area.	Further evidence has been produced in relation to the housing needs and employment land demand over the life time of the plan period. It is appropriate for the overall land supply targets set out within the plan (tables 6.1 and 6.2) to be based on the housing and employment land need figures, derived from the evidence base. The Housing Topic Paper <a href="#">[06.01.03]</a> sets out the methodology for calculating housing need; and the Employment Topic Paper <a href="#">[05.01.04]</a> for employment need.	Tracy Raftery
JPA-18.8	It is breach of promise made when current residents bought their houses and were told the surrounding land would not be built on.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations. The Site Selection Background Paper <a href="#">[03.04.01]</a> and the Growth and Spatial Options Paper <a href="#">[02.01.10]</a> provides	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		information on the methodology for selecting the strategic allocations/ growth areas.	
JPA-18.9	Community have already been ignored regarding their opposition to the work UU are carrying out and feel betrayed and misled regarding the nature of this work and not listened to.	Outside the scope of the plan.	Louise Rathbone
JPA-18.10	Non affordable or eco homes.	<p>Policy JP- H 2 sets out the approach to affordable housing and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority.</p> <p>Point 1 of the allocation policy [page 302 of the Plan] sets out that development of the site is required to provide a range of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing. As the allocation topic paper sets out <a href="#">[10.05.38, para. 4.6]</a>, given the limited size of the site and the existing high proportion of affordable housing in the vicinity of the site, affordable housing is not sought for the site. The site provides an opportunity to diversify the housing mix in the area, including providing family homes. It should be noted that this does not preclude affordable housing being delivered onsite, rather it is essential to ensure a mix of house type/ size is achieved to meet local needs.</p> <p>In relation to eco-homes, good design and addressing climate change is central to the plan and a key part of the plan strategy. Specifically, policy JP-S 2 'Carbon and Energy' includes measures related to energy efficiency within homes.</p>	Vicky Harper
JPA-18.11	This location would be suitable for older persons and specialised and supported housing.	The Housing Chapter (7) provides policy in relation to housing type, size, design and density. Details of the housing land supply can be found in the Housing Topic Paper <a href="#">[06.01.03]</a> .	Greater Manchester Housing Providers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Point 1 of the allocation policy [page 302 of the Plan] sets out that the site will provide a range of dwelling types and sizes. This could include specialist provision for supported living and older persons housing.	
JPA-18.12	Given the level and nature of the constraints, we consider a 30% reduction (549 dwelling) should be built into the supply assessment from these sites (including Land south of South of Rosary Road). The site was not allocated within the 2016 GMSF and was not considered suitable for residential development. It was only in the 2019 draft where this site was allocated for 60 dwellings.	It is considered that an appropriate evidence base has been prepared to support the plan and the site selection process. Evidence in relation to the site selection process is set out within the Site Selection Background Paper [03.04.01]. The site is identified within Area of Search OL-AS-06, which is considered to meet Site Selection Criteria 5 – land which would have a direct significant impact on delivering regeneration. The site underwent a planning constraints assessment as part of the site selection and was considered to be suitable. Further details and justification for the site’s selection is provided within the allocation topic paper [chapter 5, pages 9-11, 10.05.37]. The allocation topic paper [10.05.37] provides a full summary of the background work and evidence undertaken to inform and support the allocation, including a high-level indicative concept plan and report [10.05.24, 10.05.25] for the allocation.	PD Northern Trust Asset Management
	<b>Highways/ access/ traffic</b>		
JPA-18.13	This site is not close to any major rail links or motorways, how does it address climate change, help reduce emissions and congestion.	<p>The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The site was also subject to assessment as part of the Strategic Environmental Assessment [02.01.03] within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.</p> <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 allocation policy reasoned justification [Publication Plan, pages 304-305] sets out that the site is well positioned, in a sustainable and accessible location and with good connectivity to the wider strategic</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>highway network. In addition, point 3 of the allocation policy sets out development requirements in relation to highways and transport, including active travel measures such as walking and cycling to reduce car use.</p> <p>Locality assessments have been carried out to consider access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). Interventions to support access and reduce highway impact of the allocation are set out within Table 2 [page 26] of the allocation topic paper. Access and highway mitigation is considered within chapter 10 of the topic paper [<a href="#">10.05.37</a>, chapter 10, pages 19-32] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix G].</p> <p>It is considered that appropriate evidence has been prepared to demonstrate appropriate access arrangements and inform mitigation measures as is reflected in the allocation policy.</p>	
JPA-18.14	<p>Opening up St Cuthbert’s Fold is not a good idea from a security point of view. It will lead to higher crime. It will provide a cut through for people, will de-value existing homes and impact on pets living on the estate.</p>	<p>Policy JP-S 4 ‘Resilience’ sets out measures for tackling community challenges, including ensuring development is managed to design out crime and anti-social behaviour [<a href="#">publication plan</a>, chapter 5, page 92].</p> <p>Point 2 of the allocation policy [page 302 of the Plan] sets out that St Cuthbert’s Fold is a potential secondary access for emergency services only (as such access for regular vehicles will not be allowed).</p> <p>Policies in the <a href="#">Oldham Local Plan</a> will also be applied, such as existing Policy 9 ‘Local Environment’ which states the council will ensure development does not cause significant harm to the amenity of the occupants and future occupants of the development or to existing and future neighbouring occupants or users through impacts on privacy, safety and security, noise, pollution, the visual appearance of an area,</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		access to daylight or other nuisances. Therefore, amenity issues will be considered as part of any planning application and it is not considered necessary to make any changes to the PfE plan.	
JPA-18.15	<p>Opening up St Cuthbert's Fold does not have any pavements and as cars park on the street emergency vehicles cannot access it as the roads are not wide enough. More detail needed on what is meant by 'secondary access' - could this change over time? Who will maintain it?</p> <p>Suggest keeping the access through Fitton Hill at the top of Rosary Rd and through the bottom of proposed site through Mills Farm Close.</p>	<p>Points 2 and 3 [page 302 of the Plan] require development of the site to retain St Cuthbert's Fold as a potential secondary access for emergency services only (as such access for regular vehicles will not be allowed); and deliver any other highway improvements needed to minimise impact on the local highway network and improve accessibility to the surrounding areas, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities.</p> <p>The locality assessments have considered access to the site and identified mitigation measures needed to minimise impact on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). The primary access to the site is identified as being from Rosary Road through Fitton Hill, with the limitations of St Cuthberts Fold recognised. Further detail on the site's proposed access arrangements is set out within the allocation topic paper [<a href="#">10.05.38, chapter 10</a>] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix H].</p> <p>Furthermore, Policy JP-C7 [pages 212-214 of the Plan] sets out that planning applications will be accompanied by a Transport Assessment/Transport Statement and Travel Plan where appropriate, and that new development will be required to be located and designed to enable and encourage walking, cycling and public transport use, to reduce the negative effects of car dependency, and help deliver high quality, attractive, liveable and sustainable environments.</p> <p>It is considered that appropriate evidence has been prepared to demonstrate appropriate access arrangements and inform mitigation measures as is reflected in the allocation policy. Restrictions in regard to</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		the proposed secondary access arrangements will be dealt with at planning application stage as necessary.	
JPA-18.16	Concern about access issues on this site and the increased strain that it may place on Mills Farm Close, the same concerns would not be true if access from Simkin Way was proposed as an alternative. Concerns in terms of traffic generation, adequacy of parking, loading & turning.	<p>Point 23 of the allocation policy [page 302 of the Plan] requires development of the site to deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding areas, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities’.</p> <p>The locality assessments have considered access to the site and identified mitigation measures needed to minimise impact on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). The primary access to the site is identified as being from Rosary Road through Fitton Hill. This is because there are limitations identified to St Cuthberts Fold (onto Simkin Way) which make it inappropriate to support a full vehicular access to the site [para.10.15 of the allocation topic paper <a href="#">[10.05.38, chapter 10]</a>. Table 2 [page 24] of the topic paper sets out interventions to support access and reduce highway impact of the allocation. Further detail is available within the Transport Locality Assessments – Introductory Note and Assessment – Oldham <a href="#">[09.01.11, Appendix H]</a>. It is considered that appropriate evidence has been prepared to demonstrate appropriate access arrangements and inform mitigation measures as is reflected in the allocation policy.</p>	See Appendix.
JPA-18.17	Strongly objects to a cut through walk path from Fitton Hill, will feel unsafe.	<p>Policy JP-S 4 ‘Resilience’ sets out measures for tackling community challenges, including ensuring development is managed to design out crime and anti-social behaviour <a href="#">[publication plan, chapter 5, page 92]</a>.</p> <p>The allocation policy [point 3, page 302 of the Plan] sets out that development of the site will be required to take account of and deliver any other highway improvements that may be needed including off-site highway improvements, high-quality walking and cycling infrastructure</p>	M Smith

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>and public transport facilities. Further detail on the site's proposed access arrangements, including cycling and walking provision, is set out within the Transport Locality Assessments – Introductory Note and Assessment – Oldham [<a href="#">09.01.11</a>, Appendix H] and the allocation topic paper [<a href="#">10.05.38, chapter 10</a>]. It is considered that appropriate evidence and mitigation measures has been identified to support the site access as proposed, and specific issues can be dealt with at the detailed planning application stage.</p>	
	<b>Infrastructure</b>		
JPA-18.18	<p>A strain will be put on health centres, GPs, hospitals, dentists, community centres and schools.</p>	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies, JP-P1, JP-P5, JP-P6 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces, schools and medical facilities.</p> <p>Points 11 and 12 of the allocation policy [page 303 of the Plan] set out that development of the site is required to contribute to additional school places and health and community facilities to meet the increased demand that will be placed on provision within the area. Further detail on local services and facilities is set out within the allocation topic paper [<a href="#">10.05.38, chapter E, pages 46-48</a>].</p> <p>In addition, Oldham Council has recently published an <a href="#">Education Contribution Interim Planning Paper</a>, which sets out how the Council will deal with education contributions for the borough when determining planning applications for relevant developments that may impact on education provision, such as school places. It was adopted at Cabinet on 20 September 2021.</p> <p>The Plan needs to be read as a whole, therefore no change is considered necessary.</p>	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA-18.19	Suggested two additional criteria around meeting National Housing Standard for water consumption and that the proposals must have regard to the existing utility infrastructure that passes through the site.	<p>Policy JP-C 4 requires that 'new infrastructure includes provision for utilities and digital infrastructure where required'.</p> <p>Point 14 of the allocation policy [page 303 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site, including requiring a flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. It also states that development should incorporate sustainable drainage systems, in line with the evidence. In addition, the allocation policy supporting text [para. 11.212, page 305] sets out further detail in relation to flood risk requirements. As such when read as a whole no change is considered necessary.</p>	United Utilities
	Air Quality		
JPA-18.20	Air pollution.	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. Also see the allocation topic paper for further detail in regards to air quality [ <a href="#">10.05.38 chapter 21, pages 52-53</a> ]. When read as a whole, the plan and its evidence is considered sufficient to deal with issues arising from air pollution.	Vicky Harper
	Flood Risk		
JPA-18.21	Increased risk of flooding.	<p>Point 14 of the allocation policy [page 303 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site, including requiring a flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. It also states that development should incorporate sustainable drainage systems, in line with the evidence. In addition, the allocation policy supporting text [para. 11.212, page 305] sets out further detail in relation to flood risk requirements.</p> <p>Furthermore, the allocation topic paper sets out that a Level 1 Strategic Flood Risk Assessment (SFRA) has been carried out for Rosary Road and the allocation's flood risk was mapped. The site passes the sequential test and the Level 1 SFRA concludes that a FRA is required at</p>	Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		planning application stage. As such it is considered that the policy requirements, informed by the supporting evidence, are sufficient to ensure flood risk is considered and mitigated as part of the development of the site.	
JPA-18.22	Wording amendments suggested to the criteria on flood risk assessment including surface water management and using natural flood management and highways SUDs.	Point 14 of the allocation policy [page 303 of the Plan] sets out measures to address and mitigate flood risk as part of development of the site, including requiring a flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. It also states that development should incorporate sustainable drainage systems, in line with the evidence. In addition, the allocation policy supporting text [para. 11.212, page 305] sets out further detail in relation to flood risk requirements. It is considered that the policy requirements ensure flood risk will be dealt with accordingly as part of the development. As such when read as a whole no change is considered necessary.	United Utilities
	Loss/ impact of/on green space/ biodiversity/ ecology		
JPA-18.23	Loss of green space.	Points 4, 9 and 10 of the allocation policy [page 303 of the Plan] sets out development requirements for the allocation in relation to ensuring the allocation and surrounding area is supported by enhanced green infrastructure and open space and recreation provision. See the allocation topic paper for further detail in regards to green space [ <a href="#">10.05.37</a> , chapters 15 'Green Infrastructure' and 16 'Recreation', pages 43-45]. As such, it is considered that appropriate measures are contained within the allocation policy to address impact on green infrastructure and recreation.	Vicky Harper
JPA-18.24	Impact on the environment – loss of trees, destroying natural habitats and biodiversity, populated by a large range of wildlife (Wild Deer, Rabbits, Foxes, Bats, Frogs, Mice, Hedgehog). Nature should be conserved.	A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE [ <a href="#">10.05.31</a> ]. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. The findings of the appraisal are discussed within the allocation topic paper [chapter 18, pages 42-43, <a href="#">10.05.38</a> ]. This has informed the allocation policy. Points 6 and 7 of the allocation policy	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		[page 303 of the Plan] require development to retain and enhance biodiversity within the site, mitigate impact, provide net gain and provide further evidence at planning application stage. As such, it is considered that appropriate measures are contained within the allocation policy to mitigate impact on biodiversity as part of development of the allocation.	
JPA-18.25	Bankfield Clough SBI is partly located within the site and priority habitats located to the east. The Preliminary Ecological Appraisal confirms that the site has the potential to support specially protected species such as foraging bats and badgers and priority habitat types such as woodlands. The SBI would need to be protected to ensure that it's retained and that the development of this site doesn't not impact upon this ecological asset. Given that detailed ecology reports have not been prepared, there is no certainty that the level of development proposed can be accommodated on whilst protecting the SBI and priority habitats. It is likely once further ecology work is prepared, the level of development will need to be reduced to protect the ecological assets and therefore reducing the capacity of the site.	Site constraints have been identified and adequately assessed through the site selection process. Appropriate evidence, such as the Preliminary Ecological Appraisal [10.05.31] has been carried out to inform the process, including site capacity and potential developable area. The findings of the appraisal are discussed within the allocation topic paper [chapter 18, pages 42-43, 10.05.38]. This has informed the allocation policy wording [points 6 and 7, page 303 of the Plan] which includes requirements in regards to ecology and biodiversity, including mitigation and further investigation. As such, it is considered that the measures set out within the policy and the supporting evidence are sufficient in dealing with the ecological impacts of development on the site.	PD Northern Trust Asset Management
JPA-18.26	Wildlife Trust highlight the site impinges upon an SBI. Support the criteria that discusses retaining and enhancing the hierarchy of biodiversity and doing further habitats surveys and ask for appropriate buffers to be built into the development to protect the SBI.	The SBI has been identified in constraints work undertaken to inform the allocation as is set out within the allocation topic paper [10.05.38, chapter 18, pages 42-43]. Point 6 of the allocation policy [page 303 of the Plan] sets out that planning proposals should incorporate a suitable buffer between development plots and the SBI to protect its important features. As such, it is considered that the measures set out within the policy and the supporting evidence are sufficient in dealing with the ecological impacts of development on the site.	The Wildlife Trusts
	<b>Viability</b>		
JPA-18.27	Land south of Rosary Road is unviable.	A strategic viability assessment [03.01.01, 03.01.02, 03.01.03] has been published alongside the PfE Plan. In line with NPPF it will be assumed that planning applications which comply with the adopted PfE will be viable, however NPPF 58 also allows for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The allocation's viability	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		assessment is set out on pages 87-89 of the report. Details of the allocations viability assessment is summarised within the allocation topic paper <a href="#">[10.05.38, chapter 24 'Viability' , pages 48-51]</a> .	
	<b>Support for Allocation</b>		
JPA-18.28	No comments provided. Sound boxes ticked.	Noted.	See Appendix.
JPA-18.29	Supportive of the delivery of 60 homes, it is important to ensure there is connectivity to the Medlock valley and access to high quality amenity spaces.	Support noted. Ensuring connectivity to green spaces is recognised through the allocation policy. Points 4, 9 and 10 of the allocation policy [page 303 of the Plan] sets out development requirements for the allocation in relation to ensuring the allocation and surrounding area is supported by enhanced green infrastructure and open space and recreation provision. See the allocation topic paper for further detail in regards to green space <a href="#">[10.05.37, chapters 15 'Green Infrastructure' and 16 'Recreation', pages 43-45]</a> . As such, it is considered that appropriate measures are contained within the allocation policy to address impact on green infrastructure and recreation.	Greater Manchester Housing Providers
JPA-18.30	Land owners support the sites inclusion within PfE but feel if UU amend their turning area the site could be capable of more than 60 units based on 35 unites per hectare.	Support noted, however land (ownerships) outside of the allocation boundary are not within the scope of the PfE.	Gemma Kennedy

# Appendix

## Policy JP Allocation 12 – Beal Valley

**Table 1. Row JPA12.1**

Given Name	Family Name	On behalf of company/organisation or individual
Geoffrey	Ralphs	NA
Neil	Shoreman	NA
Lynne	Hastings	NA
Dave	Arnott	NA
Pamela	Travis	NA
Cllr Howard	Sykes	NA
Tracy	Raftery	NA
		Save Greater Manchester Green Belt (SGMGB) Oldham Groups
Linda	Newton	NA
Robert	Mayall	NA
Simon	Travis	NA
Terry	Millett	NA
Liane	Robinson	NA
Andrew	Burtonwood	NA

**Table 2. Row JPA12.3**

Given Name	Family Name	On behalf of company/organisation or individual
Max	Woodvine	NA
Paul	Roebuck	NA
Cllr Howard	Sykes	NA

**Table 3. Row JPA12.12**

Given Name	Family Name	On behalf of company/organisation or individual
Neil	Shoreman	NA
Cllr Howard	Sykes	NA
Tony	Raftery	NA
		Save Shaw's Green Belt

**Table 4. Row JPA12.10**

Given Name	Family Name	On behalf of company/organisation or individual
Cllr Howard	Sykes	NA
		Save Shaw's Green Belt

**Table 5. Row JPA12.15**

Given Name	Family Name	On behalf of company/organisation or individual
Lynn	Hastings	NA
Diane	Ames	NA

**Table 6. Row JPA12.23**

Given Name	Family Name	On behalf of company/organisation or individual
Dave	Arnott	NA
Linda	Newton	NA
Max	Woodvine	NA
Andrew	Burtonwood	NA
Pamela	Travis	NA
Neil	Shoreman	NA
Robert	Mayall	NA
Cllr Howard	Sykes	NA
Janet	Millett	NA

**Table 7. Row JPA12.25**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Patricia	Dickinson	NA
Susan	McKenna	NA
Terry	Millett	NA
Linda	Newton	NA
Andrew	Burtonwood	NA
Tracy	Wright	NA
Pamela	Travis	NA
Debbie	Abrahams MP	NA
Janet	Millett	NA

**Table 8. Row JPA12.26**

Given Name	Family Name	On behalf of company/organisation or individual
Tracy	Wright	NA
		Save Shaw's Green Belt

**Table 9. Row JPA12.29**

Given Name	Family Name	On behalf of company/organisation or individual
Geoffrey	Ralphs	NA
Andrew	Burtonwood	NA
Andrew	Burtonwood	NA
Diane	Ames	NA
Cllr Howard	Sykes	NA

**Table 10. Row JPA12.37**

Given Name	Family Name	On behalf of company/organisation or individual
		SGMGB Oldham Groups
Pamela	Travis	NA
Diane	Ames	NA
Neil	Shoreman	NA

Given Name	Family Name	On behalf of company/organisation or individual
Cllr Howard	Sykes	NA
Simon	Travis	NA

**Table 11. Row JPA12.39**

Given Name	Family Name	On behalf of company/organisation or individual
Debbie	Abrahams MP	NA
Jim	McMahon MP	NA

**Table 12. Row JPA12.40**

Given Name	Family Name	On behalf of company/organisation or individual
Neil	Shoreman	NA
Cllr Howard	Sykes	NA

**Table 13. Row JPA12.43**

Given Name	Family Name	On behalf of company/organisation or individual
		Trendairo (Duke Mill)
Peter and Diane	Martin	NA

**Table 14. Row JPA12.46**

Given Name	Family Name	On behalf of company/organisation or individual
Geoffrey	Ralphs	NA
		SGMGB Oldham Groups
Janet	Millett	NA

**Table 15. Row JPA12.47**

Given Name	Family Name	On behalf of company/organisation or individual
Geoffrey	Ralphs	NA
Terry	Millett	NA
Lynn	Hastings	NA
Linda	Newton	NA
Vicky	Harper	NA

Given Name	Family Name	On behalf of company/organisation or individual
Liane	Robinson	NA
Andrew	Burtonwood	NA
Debbie	Abrahams MP	NA
Pamela	Travis	NA
Simon	Travis	NA
Cllr Howard	Sykes	NA
Janet	Millett	NA

**Table 16. Row JPA12.51**

Given Name	Family Name	On behalf of company/organisation or individual
Geoffrey	Ralphs	NA
Terry	Millett	NA
Linda	Newton	NA
Vicky	Harper	NA
Debbie	Abrahams MP	NA
Pamela	Travis	NA
Susan	McKenna	NA
Cllr Howard	Sykes	NA
Andrew	Burtonwood	NA
		SGMGB Oldham Groups
Janet	Millett	NA

**Table 17. Row JPA12.52**

Given Name	Family Name	On behalf of company/organisation or individual
		Shaw Comrades Bowling Club
Deborah	Wroe	NA
Wayne	Neal	NA
Neil	Shoreman	NA

**Table 18. Row JPA12.53**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Andrew	Burtonwood	NA
		CPRE
Terry	Millett	NA
Pamela	Travis	NA
Robert	Mayall	NA
Cllr Howard	Sykes	NA
Debbie	Abrahams MP	NA
Janet	Millett	NA

**Table 19. Row JPA12.57**

Given Name	Family Name	On behalf of company/organisation or individual
Susan	McKenna	NA
Deborah	Wroe	NA

**Table 20. Row JPA12.61**

Given Name	Family Name	On behalf of company/organisation or individual
Susan	McKenna	NA
Patricia	Dickinson	NA
Terry	Millett	NA
Janet	Millett	NA
Janet	Millett	NA

**Table 21. Row JPA12.63**

Given Name	Family Name	On behalf of company/organisation or individual
Debbie	Abrahams MP	NA
Diane	Ames	NA
Robert	Mayall	NA
		SGMGB Oldham Groups
		CPRE

Given Name	Family Name	On behalf of company/organisation or individual
Susan	McKenna	NA
Patricia	Dickinson	NA
Victoria	Smith Scott	NA
Vicky	Harper	NA
Cllr Howard	Sykes	NA
Simon	Travis	NA
Janet	Millett	NA
Janet	Millett	NA

**Table 22. Row JPA12.64**

Given Name	Family Name	On behalf of company/organisation or individual
Cllr Howard	Sykes	NA
Terry	Millett	NA
Andrew	Mossop	NA
Liane	Robinson	NA
Andrew	Burtonwood	NA
Robert	Mayall	NA
Janet	Millett	NA
Janet	Millett	NA

**Table 23. Row JPA12.73**

Given Name	Family Name	On behalf of company/organisation or individual
Dave	Arnott	NA
		SGMGB Oldham Groups
Pamela	Travis	NA

**Table 24. Row JPA12.84**

Given Name	Family Name	On behalf of company/organisation or individual
		SGMGB Oldham Groups
		Sophia Fleming Consultancy Ltd

**Table 25. Row JPA12.88**

Given Name	Family Name	On behalf of company/organisation or individual
Max	Woodvine	NA
Karen	Gough	NA
Mike	Dodd	NA
Carol	Mole	NA
Lauren	Chamberlain	NA
Jason	Richards	NA
Chris	Richardson	NA

**Table 26. Row JPA12.97**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Andrew	Burtonwood	NA
Tracy	Wright	NA
Debbie	Abrahams MP	NA

**Table 27. Row JPA12.102**

Given Name	Family Name	On behalf of company/organisation or individual
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA
		Kellen Homes
Elena	Toader	NA
Ian	Frost	NA

**Table 28. Row JPA12.105**

Given Name	Family Name	On behalf of company/organisation or individual
		Trendairo (Duke Mill)
		Redrow Homes (Lancashire)

Given Name	Family Name	On behalf of company/organisation or individual
		Countryside Properties LLP, Casey Group Ltd and Wain Homes (CCW&G)
Peter and Diane	Martin	NA

## Policy JP Allocation 13 – Bottom Field Farm (Woodhouses)

**Table 1. Row JPA-13.2**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA
Vicky	Harper	NA
Max	Woodvine	NA
Lynne	Hastings	NA
Jason	Richards	NA

**Table 2. Row JPA-13.3**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
		P&D Northern Asset Management Ltd

**Table 3. Row JPA-13.4**

Given Name	Family Name	On behalf of company/organisation or individual
Max	Woodvine	NA
Tracy	Raftery	NA

**Table 4. Row JPA-13.6**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Jason	Richards	NA
		Greater Manchester Housing Providers
Lynne	Hastings	NA

**Table 5. Row JPA-13.7**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Robert	Mayall	NA
Peter	Pawson	NA
Tracy	Raftery	NA

**Table 6. Row JPA-13.9**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Andrew	Mossop	NA
Lynne	Hastings	NA

**Table 7. Row JPA-13.10**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Vicky	Harper	NA

**Table 8. Row JPA-13.11**

Given Name	Family Name	On behalf of company/organisation or individual
Lynne	Hastings	NA
Vicky	Harper	NA

**Table 9. Row JPA-13.13**

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Pawson	NA
Jason	Richards	NA

**Table 10. Row JPA-13.15**

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Pawson	NA
Jason	Richards	NA
Tracey	Thompsn	NA

**Table 11. Row JPA-13.17**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Tracey	Thompsn	NA

**Table 12. Row JPA-13.18**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Vicky	Harper	NA
Jason	Richards	NA

**Table 13. Row JPA-13.20**

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Pawson	NA
Lynne	Hastings	NA
Tracey	Thompsn	NA

**Table 14. Row JPA-13.23**

Given Name	Family Name	On behalf of company/organisation or individual
Peter	Pawson	NA
Jason	Richards	NA

**Table 15. Row JPA-13.31**

Given Name	Family Name	On behalf of company/organisation or individual
Colin	Raftery	NA
Vicky	Harper	NA
Lynne	Hastings	NA
Tracy	Raftery	NA
Robert	Mayall	NA

**Table 16. Row JPA-13.34**

Given Name	Family Name	On behalf of company/organisation or individual
Elena	Toader	NA
Ian	Frost	NA
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA

**Table 17 - Row JPA-13.35**

Given Name	Family Name	On behalf of company/organisation or individual
Karen	Gough	NA
Mike	Dodd	NA
Gemma	Pierce	NA
Sonia	Gilmartin	NA
Carol	Mole	NA
Samantha	Wait	NA

## Policy JP Allocation 14 – Broadbent Moss

**Table 1. Row JPA14.1**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Dave	Arnott	NA
Laura	Chamberlain	NA
Gareth	Lord	NA
Samuel	Mcconkie	NA
Adamm	Moore	NA
JJ	Fletcher	NA
Lynne	Hastings	NA
Trevor	Widdop	NA
Debbie	Abrahams MP	NA
Cllr Howard	Sykes	NA
Max	Woodvine	NA
Tracy	Raftery	NA
JW and B	Rustidge	NA

**Table 2. Row JPA14.3**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Linda	Newton	NA
		CPRE

**Table 3. Row JPA14.8**

Given Name	Family Name	On behalf of company/organisation or individual
Victoria	Smith Scott	NA
Lauren and Christine	Beatty	NA

Given Name	Family Name	On behalf of company/organisation or individual
Trevor	Widdop	NA
Samuel	Mcconkie	NA
Adamm	Moore	NA

**Table 4. Row JPA14.15**

Given Name	Family Name	On behalf of company/organisation or individual
Sue	McGrath	NA
Vicky	Harper	NA

**Table 5. Row JPA14.16**

Given Name	Family Name	On behalf of company/organisation or individual
Sue	McGrath	NA
Doug	Hoy	NA

**Table 6. Row JPA14.18**

Given Name	Family Name	On behalf of company/organisation or individual
Nicola	Pitman	NA
Lynne	Hastings	NA
		Save Shaw's Green Belt

**Table 7. Row JPA14.23**

Given Name	Family Name	On behalf of company/organisation or individual
		Save Shaw's Green Belt
Lynne	Hastings	NA

**Table 8. Row JPA14.24**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA
Janet	Millett	NA
Emily	Edwards	NA
Dave	Arnott	NA
Linda	Newton	NA
Max	Woodvine	NA
Liane	Robinson	NA
Laura	Chamberlain	NA
Gareth	Lord	NA
Adamm	Moore	NA
Diane	Ames	NA
Cllr Howard	Sykes	NA

**Table 9. Row JPA14.27**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Terry	Millett	NA

**Table 10. Row JPA14.28**

Given Name	Family Name	On behalf of company/organisation or individual
Gillian	Holden	NA
Linda	Newton	NA
John	Shepherd	NA
Liane	Robinson	NA
Andrew	Burtonwood	NA
Laura	Chamberlain	NA

Given Name	Family Name	On behalf of company/organisation or individual
Gareth	Lord	NA
Samuel	Mconkie	NA
Lauren and Christine	Beatty	NA
JJ	Fletcher	NA
Trevor	Widdop	NA
Debbie	Abrahams MP	NA
Diane	Ames	NA

**Table 11. Row JPA14.33**

Given Name	Family Name	On behalf of company/organisation or individual
John	Shepherd	NA
Cllr Howard	Sykes	NA
Diane	Ames	NA

**Table 12. Row JPA14.34**

Given Name	Family Name	On behalf of company/organisation or individual
Debbie	Abrahams MP	NA
Jim	McMahon MP	NA
		Greater Manchester Housing Providers
		PD Northern Trust Asset Management

**Table 13. Row JPA14.42**

Given Name	Family Name	On behalf of company/organisation or individual
Tracy	Wright	NA
		SGMGB Oldham Groups
		PD Northern Trust Asset Management

**Table 14. Row JPA14.43**

Given Name	Family Name	On behalf of company/organisation or individual
Janet	Millett	NA
Terry	Millett	NA
Linda	Newton	NA
Vicky	Harper	NA
Liane	Robinson	NA
Andrew	Burtonwood	NA
Gaynor	O-Ryan	NA
Debbie	Abrahams MP	NA
		SGMGB Oldham Groups
Nicola	Pitman	NA
Lynne	Hastings	NA

**Table 15. Row JPA14.44**

Given Name	Family Name	On behalf of company/organisation or individual
Maria	Rowland	NA
Sue	McGrath	NA
Tracy Wright		NA

**Table 16. Row JPA14.45**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
JJ	Fletcher	NA
Debbie	Abrahams MP	NA
Cllr Howard	Sykes	NA
Terry	Millett	NA
Andrew	Burtonwood	NA
Lauren and Christine	Beatty	NA

Given Name	Family Name	On behalf of company/organisation or individual
Trevor	Widdop	NA
Dave	Arnott	NA
Linda	Newton	NA
Gaynor	O-Ryan	NA
		SGMGB Oldham Groups

**Table 17. Row JPA14.46**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Diane	Ames	NA
Victoria	Smith Scott	NA
Colin	Raftery	NA
Vicky	Harper	NA
Tracy	Raftery	NA
Lynne	Hastings	NA
Nicola	Pitman	NA

**Table 18. Row JPA14.47**

Given Name	Family Name	On behalf of company/organisation or individual
Gillian	Holden	NA
		Save Shaw's Green Belt
Doug	Hoy	NA

**Table 19. Row JPA14.48**

Given Name	Family Name	On behalf of company/organisation or individual
Gaynor	O-Ryan	NA
Nicola	Pitman	NA

Given Name	Family Name	On behalf of company/organisation or individual
Lindy	Worthington	NA
Liane	Robinson	NA
Trevor	Widdop	NA
Gillian	Holden	NA
Doug	Hoy	NA
Victoria	Smith Scott	NA
Lauren and Christine	Beatty	NA

**Table 20. Row JPA14.49**

Given Name	Family Name	On behalf of company/organisation or individual
John	Shepherd	NA
Andrew	Burtonwood	NA
Andrew	Mossop	NA

**Table 21. Row JPA14.50**

Given Name	Family Name	On behalf of company/organisation or individual
Doug	Hoy	NA
Tracy	Right	NA

**Table 22. Row JPA14.53**

Given Name	Family Name	On behalf of company/organisation or individual
Terry	Millett	NA
Lauren and Christine	Beatty	NA
JJ	Fletcher	NA
Trevor	Widdop	NA

**Table 23. Row JPA14.54**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Emily	Edwards	NA
Gillian	Holden	NA
Vicky	Harper	NA
Andrew	Burtonwood	NA
Laura	Chamberlain	NA
Gareth	Lord	NA
Tracey	Rafferty	NA
Samuel	Mcconkie	NA
Adamm	Moore	NA
Lauren and Christine	Beatty	NA
Diane	Ames	NA
JJ	Fletcher	NA
JW and B	Rustidge	NA
Trevor	Widdop	NA
Debbie	Abrahams MP	NA
Victoria	Smith-Scott	NA
Liane Robinson	Robinson	NA
Cllr Howard Sykes	Sykes	NA

**Table 24. Row JPA14.55**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Janet	Millett	NA
Emily	Edwards	NA
Gillian	Holden	NA
Maria	Rowland	NA
Doug	Hoy	NA

Given Name	Family Name	On behalf of company/organisation or individual
Cllr Howard Sykes	Sykes	NA
Liane Robinson	Robinson	NA

**Table 25. Row JPA14.56**

Given Name	Family Name	On behalf of company/organisation or individual
Emily	Edwards	NA
Gillian	Holden	NA
Gaynor	O-Ryan	NA
Tracy	Wright	NA

**Table 26. Row JPA14.57**

Given Name	Family Name	On behalf of company/organisation or individual
Emily	Edwards	NA
Gaynor	O-Ryan	NA
Tracy	Wright	NA
Gillian	Holden	NA
		SGMGB Oldham Groups

**Table 27. Row JPA14.58**

Given Name	Family Name	On behalf of company/organisation or individual
Sue	McGrath	NA
		CPRE

**Table 28. Row JPA14.60**

Given Name	Family Name	On behalf of company/organisation or individual
Andrew	Burtonwood	NA

Given Name	Family Name	On behalf of company/organisation or individual
Gareth	Lord	NA
Lauren and Christine	Beatty	NA
JJ	Fletcher	NA

**Table 29. Row JPA14.65**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Laura	Chamberlain	NA
Robert	Mayall	NA
Janet	Millett	NA
Terry	Millett	NA
Samuel	Mcconkie	NA
Adamm	Moore	NA
Lauren and Christine	Beatty	NA
Cllr Howard	Sykes	NA
JJ	Fletcher	NA
Debbie	Abrahams MP	NA

**Table 30. Row JPA14.65**

Given Name	Family Name	On behalf of company/organisation or individual
JW and B	Rustidge	NA
Cllr Howard	Sykes	NA
Laura	Chamberlain	NA
Gareth	Lord	NA

**Table 31. Row JPA14.68**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Burns	NA
Cllr Howard	Sykes	NA

**Table 32. Row JPA14.69**

Given Name	Family Name	On behalf of company/organisation or individual
John	Shepherd	NA
Trevor	Widdop	NA
		SGMGB Oldham Groups

**Table 33. Row JPA14.76**

Given Name	Family Name	On behalf of company/organisation or individual
JJ	Fletcher	NA
		Sophia Fleming Consulting Ltd
		SGMGB Oldham Groups
		PD Northern Trust Asset Management

**Table 34. Row JPA14.78**

Given Name	Family Name	On behalf of company/organisation or individual
Carol	Mole	NA
Jason	Richards	NA
Karen	Gough	NA
Mike	Dodd	NA

**Table 35. Row JPA14.79**

Given Name	Family Name	On behalf of company/organisation or individual
Terry	Millett	NA
Linda	Newton	NA
Tracy	Wright	NA
Trevor	Widdop	NA
Liane q	Robinson	NA
		Save Shaw's Green Belt

**Table 36. Row JPA14.85**

Given Name	Family Name	On behalf of company/organisation or individual
Laura	Chamberlain	NA
Adamm	Moore	NA
		Save Shaw's Green Belt
Gillian	Holden	NA
Gaynor	O-Ryan	NA
Vicky	Harper	NA

**Table 37. Row JPA14.89**

Given Name	Family Name	On behalf of company/organisation or individual
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA
Elena	Toader	NA
Ian	Frost	NA

**Table 38. Row JPA14.90**

Given Name	Family Name	On behalf of company/organisation or individual
Mr P	Haworth	NA
		The Connell Group
		Countryside Properties LLP, Casey Group Ltd and Wain Homes (CCW&G)

## Policy JP Allocation 15 – Chew Brook (Robert Fletchers)

**Table 1. Row JPA-15.6**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA
Vicky	Harper	NA
Max	Woodvine	NA
Lynne	Hastings	NA

**Table 2. Row JPA-15.8**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Christopher	Tansley	NA
Max	Woodvine	NA
Tracy	Raftery	NA

**Table 3. Row JPA-15.10**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Lynne	Hastings	NA

**Table 4. Row JPA-15.11**

Given Name	Family Name	On behalf of company/organisation or individual
Katherine	Grant	NA
Christopher	Tansley	NA
		CPRE
		Chasten Holdings Ltd

**Table 5. Row JPA-15.15**

Given Name	Family Name	On behalf of company/organisation or individual
Katherine	Grant	NA
Robert	Mayall	NA
Vicky	Harper	NA
Tracy	Raftery	NA

**Table 6. Row JPA-15.19**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
Katherine	Grant	NA
Christopher	Tansley	NA
Vicky	Harper	NA
Lynne	Hastings	NA

**Table 7. Row JPA-15.22**

Given Name	Family Name	On behalf of company/organisation or individual
Katherine	Grant	NA
Vicky	Harper	NA
Lynne	Hastings	NA

**Table 8. Row JPA-15.24**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Lynne	Hastings	NA

**Table 9. Row JPA-15.30**

Given Name	Family Name	On behalf of company/organisation or individual
Katherine	Grant	NA
Vicky	Harper	NA

**Table 10. Row JPA-15.32**

Given Name	Family Name	On behalf of company/organisation or individual
Colin	Raftery	NA
Tracy	Raftery	NA
Vicky	Harper	NA
Lynne	Hastings	NA
Robert	Mayall	NA

**Table 11. Row JPA-15.33**

Given Name	Family Name	On behalf of company/organisation or individual
Elena	Toader	NA
Ian	Frost	NA
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA

**Table 12. Row JPA-15.34**

Given Name	Family Name	On behalf of company/organisation or individual
Ian	Frost	NA
Karen	Gough	NA
Mike	Dodd	NA
Carol	Mole	NA

Given Name	Family Name	On behalf of company/organisation or individual
Jason	Richards	NA

## Policy JP Allocation 16 – Cowlshaw

**Table 1. Row JPA 16.2**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA
Dave	Arnott	NA
Linda	Newton	NA
Max	Woodvine	NA

**Table 2. Row JPA 16.13**

Given Name	Family Name	On behalf of company/organisation or individual
		Save Shaw's Green Belt
Tracy	Rafferty	NA

**Table 3. Row JPA 16.17**

Given Name	Family Name	On behalf of company/organisation or individual
		Save Shaw's Green Belt
Max	Woodvine	NA

**Table 4. Row JPA 16.23**

Given Name	Family Name	On behalf of company/organisation or individual
Colin	Rafferty	NA
Vicky	Harper	NA
Tracy	Rafferty	NA

**Table 5. Row JPA 16.24**

Given Name	Family Name	On behalf of company/organisation or individual
Linda	Newton	NA
Vicky	Harper	NA
Debbie	Abrahams MP	NA

**Table 6. Row JPA 16.25**

Given Name	Family Name	On behalf of company/organisation or individual
Linda	Newton	NA
John	Shepherd	NA
Andrew	Burtonwood	NA

**Table 7. Row JPA 16.26**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Andrew	Burtonwood	NA

**Table 8. Row JPA 16.31**

Given Name	Family Name	On behalf of company/organisation or individual
Mr J and Mrs B	Fitton	NA
		P&D Northern Asset Management

**Table 9. Row JPA 16.36**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
		Save Greater Manchester Green Belt

**Table 10 – Row JPA 16.37**

Given Name	Family Name	On behalf of company/organisation or individual
John	Hawkins	NA
John	Shepherd	NA
Debbie	Abrahams MP	NA

**Table 11. Row JPA 16.40**

Given Name	Family Name	On behalf of company/organisation or individual
John	Hawkins	NA
John	Shepherd	NA
Debbie	Abrahams MP	NA

**Table 12. Row JPA 16.49**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Cllr Howard	Sykes	NA
John	Hawkins	NA
Linda	Newton	NA
Debbie	Abrahams MP	NA

**Table 13. Row JPA 16.52**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Andrew	Burtonwood	NA
John	Shepherd	NA
		Save Greater Manchester Green Belt

**Table 14. Row JPA 16.55**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Linda	Newton	NA
Vicky	Harper	NA
Tracy	Rafferty	NA
		Save Shaw's Green Belt

**Table 15. Row JPA 16.68**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
Andrew	Burtonwood	NA
Debbie	Abrahams MP	NA

## Policy JP Allocation 17 – Land south of Coal Pit Lane (Ashton Road)

**Table 1. Row JPA-17.1**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA
Lynne	Hastings	NA

**Table 2. Row JPA-17.2**

Given Name	Family Name	On behalf of company/organisation or individual
		Save Royton's Green Belt
Max	Woodvine	NA
Tracy	Raftery	NA
		Campaign to Protect Rural England (CPRE)

**Table 3. Row JPA-17.6**

Given Name	Family Name	On behalf of company/organisation or individual
Karen	Gough	NA
Mike	Dodd	NA
Carol	Mole	NA
Jason	Richards	NA

**Table 4. Row JPA-17.10**

Given Name	Family Name	On behalf of company/organisation or individual
Colin	Raftery	NA
Vicky	Harper	NA
Tracy	Raftery	NA

**Table 5. Row JPA-17.14**

Given Name	Family Name	On behalf of company/organisation or individual
Lynne	Hastings	NA
Vicky	Harper	NA

**Table 6. Row JPA-17.16**

Given Name	Family Name	On behalf of company/organisation or individual
Lynne	Hastings	NA
Tracy	Raftery	NA

**Table 7. Row JPA-17.17**

Given Name	Family Name	On behalf of company/organisation or individual
Vicky	Harper	NA
George	Goodhall	NA
Lynne	Hastings	NA

**Table 8. Row JPA-17.19**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
John	Shepherd	NA

**Table 9. Row JPA-17.20**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
John	Shepherd	NA
Louise	Rathbone	NA
Lynne	Hastings	NA

Given Name	Family Name	On behalf of company/organisation or individual
Jim	McMahon	NA

**Table 10. Row JPA-17.24**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
Vicky	Harper	NA
		Campaign to Protect Rural England (CPRE)

**Table 11. Row JPA-17.25**

Given Name	Family Name	On behalf of company/organisation or individual
Tracy	Raftery	NA
Vicky	Harper	NA
Louise	Rathbone	NA

**Table 12. Row JPA-17.26**

Given Name	Family Name	On behalf of company/organisation or individual
		Campaign to Protect Rural England (CPRE)
		Wildlife Trusts

**Table 13. Row JPA-17.27**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
Vicky	Harper	NA

**Table 14. Row JPA-17.31**

Given Name	Family Name	On behalf of company/organisation or individual
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA
Elena	Toader	NA
Ian	Frost	NA

**Table 15. JPA-17.35**

Given Name	Family Name	On behalf of company/organisation or individual
		Chasten Holdings Ltd
Joe	Jaskolka	

## Policy JP Allocation 18 – South of Rosary Road

**Table 1. Row JPA-18.1**

Given Name	Family Name	On behalf of company/organisation or individual
Karen	Gough	NA
Mike	Dodd	NA
Carol	Mole	NA
Jason	Richards	NA
Robert	Mayall	NA

**Table 2 Row JPA-18.2**

Given Name	Family Name	On behalf of company/organisation or individual
Robert	Mayall	NA
Paul	Roebuck	NA

**Table 3. Row JPA-18.4**

Given Name	Family Name	On behalf of company/organisation or individual
Colin	Raftery	NA
Vicky	Harper	NA
Tracy	Raftery	NA

**Table 4. Row JPA-18.6**

Given Name	Family Name	On behalf of company/organisation or individual
Max	Woodvine	NA
Tracy	Raftery	NA

**Table 5. Row JPA-18.8**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
Louise	Rathbone	NA

**Table 6. Row JPA-18.13**

Given Name	Family Name	On behalf of company/organisation or individual
Paul	Roebuck	NA
John	Shepherd	NA

**Table 7. Row JPA-18.14**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
Louise	Rathbone	NA
William	Oldham	NA
Gavin	Whittaker	NA
Jill	Edwards	NA

**Table 8. Row JPA-18.15**

Given Name	Family Name	On behalf of company/organisation or individual
Dawn	Lomas	NA
Jill	Edwards	NA
Lynn	Goldthorpe	NA
Chris	Ullah	NA
Gavin	Whittaker	NA

**Table 9. Row JPA-18.16**

Given Name	Family Name	On behalf of company/organisation or individual
Jim	McMahon	NA
Louise	Rathbone	NA
John	Shepherd	NA

**Table 10. Row JPA-18.18**

Given Name	Family Name	On behalf of company/organisation or individual
William	Oldham	NA
Vicky	Harper	NA
Jill	Edwards	NA

**Table 11. Row JPA-18.24**

Given Name	Family Name	On behalf of company/organisation or individual
Jill	Edwards	NA
Vicky	Harper	NA
Tracy	Raftery	NA
Dawn	Lomas	NA
Louise	Rathbone	NA

**Table 12. Row JPA-18.27**

Given Name	Family Name	On behalf of company/organisation or individual
		Chasten Holdings Ltd.
		PD Northern Trust Asset Management
Joe	Jaskolka	NA

**Table 13. Row JPA-18.28**

Given Name	Family Name	On behalf of company/organisation or individual
Elena	Toader	NA
Ian	Frost	NA
Robert	Mayall	NA
Allan	Rogers	NA
Joel	Woodhouse	NA
Terence	Kelly	NA
Stephen	Kershaw	NA