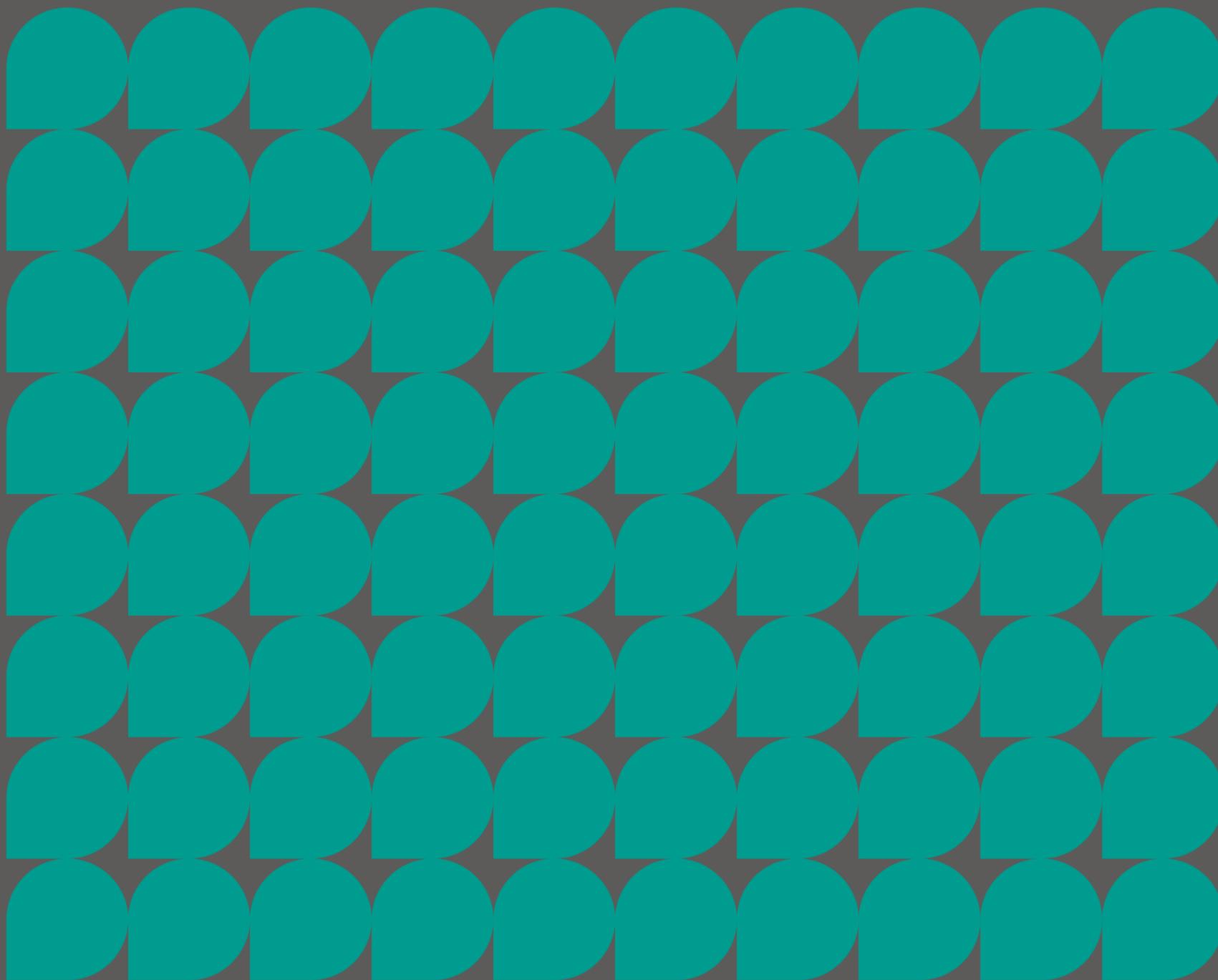


Places for Everyone

Regulation 22 Summaries of Allocations

Main Issues

February 2022



Chapter 11 – Allocations: Cross Boundary Strategic Allocations

A summary of the main issues raised in relation to the policies within PfE 2021 Chapter 11 (Cross Boundary) and the relevant respondents to PfE 2021 is set out below:

PfE 2021 Policy JP Allocation 1.1 Heywood / Pilsworth (Northern Gateway)

Row	Key Issue	Response
1	Object to the principle and proposed scale of the loss of Green Belt/green space	Chapter 4 (4.1 - 4.23) of the Plan summarises the PfE Spatial Strategy which seeks to boost the competitiveness of the Northern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. A critical part of this includes the identification of a strategic employment site at Heywood/Pilsworth (JPA1.1). The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
2	There is a disproportionate distribution of employment land across the plan area.	A key aim of the plan's strategy is to rebalance the Greater Manchester economy and significantly boost economic output from the north. A critical part of this includes the identification of a strategic employment site at Heywood/Pilsworth (JPA1.1).
3	Concern over the traffic impacts of the development on existing roads/motorways which are already at capacity.	No change necessary. The Transport Locality Assessments for JPA1.1 (Heywood/Pilsworth) [09.01.07 and 09.01.17] assess and evaluate the impact of the PfE proposals on the transport network.
4	Site has poor access by public transport and investment in public transport is unlikely to be sufficient to mitigate the impacts of the development.	No change necessary. The Transport Locality Assessments for JPA1.1 (Heywood/Pilsworth) [09.01.07 and 09.01.17] assess and evaluate the impact of the PfE proposals on the transport network.
5	Transport evidence is incomplete and does not identify in sufficient detail	Transport Locality Assessment – [Cross Boundary] [09.01.07] and Transport Locality Assessments Addendum –Cross-boundary allocations (1) Northern Gateway (Heywood/Pilsworth) – Places for Everyone July 2021 [09.01.17] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.

	the nature, scale and timing of infrastructure requirements at the SRN.	<p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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>
6	No need for new employment land when existing estates are not fully occupied.	A key aim of the plan’s strategy is to rebalance the Greater Manchester economy and significantly boost economic output from the north. A critical part of this includes the identification of a strategic employment site at Heywood/Pilsworth (JPA1.1).
7	The site is not deliverable.	Section E of the JPA1.1 (Heywood/Pilsworth) Topic Paper [10.01.54] summarises matters around the deliverability of the site.
8	More detail needed on the jobs created and the businesses that will invest.	PfE is seeking to allocate the Heywood Pilsworth site (JPA1.1) for employment-led development. It is too early in the process to consider the specific businesses and types of jobs that could be accommodated on the site. Nevertheless, the site promoter has prepared a study highlighting the economic benefits of the proposal [10.01.10] which indicates that the site has the potential to generate around 20,000 new jobs.
9	Employment numbers are not justified as warehousing is now predominantly automated and does not create many jobs.	The site promoter has prepared a study highlighting the economic benefits of the proposal [10.01.10] which indicates that the site has the potential to generate around 20,000 new jobs.
10	Proposal would conflict with climate change objectives due to increased traffic.	<p>Climate change is a key theme running throughout PfE and it is only through a combination of actions that it can be properly addressed. In particular PfE sets out:</p> <ul style="list-style-type: none"> • Methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies • The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, including measures to ensure that all new homes and commercial/industrial buildings achieve net zero carbon by 2028 • The delivery of renewable and low carbon energy schemes through heat and energy network

		<ul style="list-style-type: none"> • Measures that will be taken in Greater Manchester to future proof the city region by mitigating and making it more resilient to environmental challenges, including climate change • Water based measures, such as reducing flood risk, to adapt and reduce the impacts of climate change • Measures to support improvements in air quality
11	Employment is not accessible from key housing proposals at Elton and Walshaw.	The proposed strategic allocations have been chosen following a robust site selection exercise outlined within the Site Selection Topic Paper [03.04.01] .
12	The site should not be developed until all brownfield sites are exhausted.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
13	The proposal should be accompanied by clear plans for infrastructure delivery.	Policy JPA1.1 (Heywood/Pilsworth) specifies that any proposals for this allocation must be in accordance with a comprehensive masterplan relating to the area to come forward in the plan period that has been previously approved by the LPA(s). It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development in line with Policy JP-D 1 'Infrastructure Implementation'.
14	Concern that there is an absence of clear expectations for high quality sustainable water management and that the development will increase flood risk.	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.
15	Concern about the impact on schools and healthcare facilities.	<p>Section 24 of the JPA1.1 (Heywood/Pilsworth) Topic Paper [10.01.54] sets out the situation with regards to education provision in association with the proposed development.</p> <p>Section 25 of the JPA1.1 (Heywood/Pilsworth) Topic Paper [10.01.54] sets out the situation with regards to healthcare provision in association with the proposed development.</p> <p>Chapter 12 of PfE covers the delivery of the plan and sets out information on an Infrastructure Strategy, delivering new infrastructure, funding etc.</p>

16	The development will lead to the loss of recreation space.	Policy JPA1.1 (Heywood/Pilsworth) specifies that any development of the site will be required to make provision for new, high quality, publicly accessible multi-functional green and blue infrastructure to provide health benefits to workers and residents.
17	The development will lead to the loss of biodiversity/ecological features.	The allocation is evidenced by an Ecological Report [10.01.03] . Ecological/biodiversity matters associated with the Heywood/Pilsworth site are summarised in section 19 of the Heywood/Pilsworth Allocation Topic Paper [10.01.54] . Policy JPA1.1 (Heywood/Pilsworth) requires that new development on the site will be required to minimise the impact on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'
18	Buildings should be built to carbon-neutral standards.	Climate change is a key theme running throughout PfE and it is only through a combination of actions that it can be properly addressed. This includes: <ul style="list-style-type: none"> • Methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies • The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, including measures to ensure that all new homes and commercial/industrial buildings achieve net zero carbon by 2028 • The delivery of renewable and low carbon energy schemes through heat and energy network • Measures that will be taken in Greater Manchester to future proof the city region by mitigating and making it more resilient to environmental challenges, including climate change • Water based measures, such as reducing flood risk, to adapt and reduce the impacts of climate change • Measures to support improvements in air quality
19	Concern over the impact on landscape features.	Paragraph 18.4 of the JPA1.1 (Heywood/Pilsworth) Topic Paper [10.01.54] identifies a series of opportunities to inform the evolving masterplan process, and to ensure the development can be incorporated successfully into the local landscape.
20	Whittle Brook should be designated as a SSSI for geology/geomorphology.	Policy JPA1.1 (Heywood/Pilsworth) requires that new development on the site will be required to minimise the impact on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'
21	Concerns about the impact on air quality.	Section 22 of the JPA1.1 (Heywood/Pilsworth) Topic Paper [10.01.54] highlights key information with regards to air quality associated with the proposed development of this site.
22	Concerns over the impact on heritage assets.	Policy JPA1.1 (Heywood/Pilsworth) specifies that any development of the site will be required to carry out a detailed assessment and evaluation of known and potential archaeological sites including Meadow Croft Farm, historic landscape features and built heritage assets, to establish specific requirements for the protection and enhancement of significant heritage assets. The Policy also specifies that any development of the site will be required to protect and, where appropriate, enhance heritage assets and their setting within the allocation, including the Grade II Listed buildings Brick Farmhouse and Lower Whittle Farmhouse and the wider historic character of the

		surrounding setting in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.
23	The site selection process has not been clear.	The proposed strategic allocations have been chosen following a robust site selection exercise outlined within the Site Selection Topic Paper [03.04.01] . No change considered necessary. The approach in relation to the removal of sites from the Green Belt and allocation for development is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for the Green Belt amendments.

PfE 2021 Policy JP Allocation 1.2 Simister/Bowlee

Row	Key Issue	Response
1	Object to the scale of development.	No change is considered to be necessary. 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 [02.01.10]
2	In conjunction with JPA 1.1 Heywood/Pilsworth the proposals are considered over development.	No change is considered to be necessary. The allocation is of a scale to address the central theme of the spatial strategy for Greater Manchester in delivering inclusive growth across the city region complemented by a key aim to boost the competitiveness and economic outputs from the northern parts of the conurbation. The Northern Gateway is one of the key locations that will help to deliver these fundamental objectives.
3	The development will cause considerable harm to character of Simister village.	No change necessary. Policy JP-P1 seeks to create sustainable places including the use of measures to ensure that new development is fully integrated into existing communities and that it makes a positive contribution to its coherence and character.
4	The requirement for a comprehensive masterplan for the whole site allocation is not justified.	No change is considered to be necessary. The requirement for a masterplan to be approved by the LPA in advance of the submission of a planning application is intended to ensure that the LPA is fully satisfied with the intended development. It is considered that this will actually save time during the planning application process as key development parameters will have already been agreed.
5	Object to the loss of Green Belt/green space	No change is considered to be necessary. The requirement for a masterplan to be approved by the LPA in advance of the submission of a planning application is intended to ensure that the LPA is fully satisfied with the intended development. It is considered that this will actually save time during the planning application process as key development parameters will have already been agreed.
6	Object to the loss of green infrastructure, key walking routes and rights of way used by both walkers and horse riders.	PfE Policy JPA 1.2 (Simister and Bowlee) requires new development on the site to make provision for new, high quality, publicly accessible, multi-functional green and blue infrastructure within the allocation to provide health benefits to local residents as well as creating a visually attractive environment.
7	Concerns regarding the impact of the development on the Landscape Character Areas included within the allocation.	Evidence on Landscape Character Areas can be found in Section 18 of the Simister and Bowlee Allocation Topic Paper [10.01.55] .
8	There is a lack of priority around affordable housing provision.	No change is considered to be necessary. Policy JPA1.2 (Simister and Bowlee) is a cross-boundary allocation that falls within Bury and Rochdale boroughs. The Policy specifies that affordable housing will be required in accordance with local planning policy

		requirements. It does not specify the tenure split as there are different requirements within each district based on the adopted policies within Bury and Rochdale.
9	Site doesn't meet the site selection criteria and the site selection process has been developer-led.	No change is considered to be necessary. The proposed strategic allocations have been chosen following a robust site selection exercise outlined within the Site Selection Topic Paper [03.04.01] .
10	There is no need to release Green Belt when there is an adequate supply of brownfield sites.	A large number of previously developed sites suitable for housing are identified in the council's Brownfield Land Register and its Strategic Housing Land Availability Assessment (SHLAA). However, these sites are insufficient to meet Bury's identified need and as such there is a need to identify additional sites.
11	The proposal conflicts with the climate emergency.	No change necessary. The Integrated Appraisal (IA) Scoping Report [02.01.01] notes that the declaration of climate emergencies by GMCA and the 10 local authorities was the most significant shift since the previous update to the Scoping Report. The IA objectives and criteria particularly related to climate emergency were carefully considered to establish whether there has been a material change requiring an amendment. As a result of the update, it is concluded that no additions or changes are required to the IA at this stage. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] .
12	Housing need calculations are based on out-of-date information i.e. 2014 household projections and do not take into account the impacts of Covid and Brexit.	The starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area. The methodology uses the ONS 2014-based household projections. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
13	The site will not be delivered as anticipated.	Details of the anticipated phasing for the Simister and Bowlee site are set out in section 27 of the Site Allocation Topic Paper for Simister and Bowlee [10.01.55] .
14	Concerns regarding the viability of the site.	Evidence on the viability and deliverability of the proposed site allocation at Simister and Bowlee is set out in section E Deliverability of the Site Allocation Topic Paper for Simister and Bowlee [10.01.55] .
15	The proposal will have an adverse impact on local roads and the wider network	The Transport Locality Assessments for Bury's Cross Boundary site allocations [09.01.07] assess and evaluate the impact of the PfE proposals on the transport network.

	leading to increased congestion and air pollution.	In addition, PfE Policy JPA1.2 (Simister and Bowlee) requires that new development on the site will be required to make provision for key enabling infrastructure, including off-site highway works where these are necessary to ensure acceptable traffic movement.
16	The site is poorly served by public transport.	No change is considered to be necessary. The Transport Locality Assessments for Bury's Cross Boundary allocations [09.01.07] assess and evaluates the impact of the PfE proposals on the transport network.
17	Need more information on how infrastructure will be funded.	No change necessary. Chapter 12 of PfE covers the delivery of the plan and sets out information on an Infrastructure Strategy, delivering new infrastructure, funding etc. A number of other policies in the Plan provide a sufficient policy framework to address this matter by requiring new development to be supported by the necessary infrastructure. The Plan needs to be read as a whole, therefore no change is considered necessary.
18	There is a lack of healthcare and educational infrastructure to support the development.	PfE includes policies that seek to ensure that the development proposals make an appropriate contribution to support the provision of new and improved education and healthcare facilities, and this is reinforced within each of the allocations policies, where necessary. In the case of Simister and Bowlee the allocation policy makes provision for a new two-form entry primary schools and a financial contribution towards off-site secondary school provision to meet the needs of the prospective school aged residents. The policy also includes requirements for new local centres in accessible locations which include a range of appropriate retail, health and community facilities and ensure that they are integrated with existing communities.
19	Proposals will lead to the loss of biodiversity and ecological habitats and wildlife and environmental surveys have not been done correctly.	The allocation is supported by an Ecological Report [10.01.15] . Ecological/biodiversity matters associated with the Simister and Bowlee site are summarised in section 19 of the Simister and Bowlee Allocation Topic Paper [10.01.55] . In addition, Policy JPA1.2 (Simister and Bowlee) requires that new development on the site will be required to minimise the impact on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'.
20	Loss of open land will have a negative impact on physical and mental health.	PfE Policy JPA 1.2 (Simister and Bowlee) requires that new development on the site make provision for new, high quality, publicly accessible, multi-functional green and blue infrastructure within the allocation to provide health benefits to local residents as well as creating a visually attractive environment.
21	The proposal will lead to increased flooding.	Section 12 of the JPA1.2 (Simister and Bowlee) Topic Paper [10.01.55] highlights key information with regards to flood risk. Policy JPA1.2 (Simister and Bowlee) specifies that any development of the site will be required to ensure that it is safe from and mitigates for potential flood risk from all sources including Whittle Brook, Castle Brook and Brightley Brook and does not increase the flood risk elsewhere. Development will also be required to ensure that sustainable drainage systems are fully incorporated into the development to manage surface water and control the rate of surface water run-off, discharging in accordance with the hierarchy of drainage options. Where possible, natural SuDS techniques should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and be designed as multi-functional green infrastructure connecting to the wider green and blue infrastructure network in accordance with Policy JP-S 5 'Flood Risk and the Water Environment' and nationally recognised SuDS design standards.

22	Concern that there is an absence of clear expectations for high quality sustainable water management and that the development will increase flood risk.	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.
23	Need to consider heritage assets within the site.	Policy JPA1.2 (Simister and Bowlee) requires the protection and, where appropriate, enhancement of heritage assets and their setting within the allocation and to carry out a detailed assessment and evaluation of known and potential archaeological sites to establish specific requirements for the protection and enhancement of significant heritage assets.
24	Concerns over the impact on noise and air quality.	The proposed site allocation at Simister and Bowlee is supported by a range of evidence including a noise and air quality statement [10.01.19] . Furthermore, Policy JPA1.2 (Simister and Bowlee) requires that new development on the site incorporate appropriate noise and air quality mitigation measures and high quality landscaping along the M60 motorway corridors and local road network if required within the allocation.

Chapter 11 – Allocations (Cross-Boundary)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Cross-Boundary) and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JPA2 – Stakehill

Row	Main Issue	PfE Response
1	There is no need to release Green Belt when Rochdale has an adequate supply of brownfield sites. No exceptional circumstances for the Green Belt release have been met.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas.</p>
2	The plan talks about creating new Green Belt land so there is a smaller net loss of Green Belt – a shocking attempt to deceive people.	The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] provides appropriate justification for the Green Belt Additions.
3	No demand or need for the employment element / not enough evidence / not considered impact of Brexit and Covid on the economy	<p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered to be a robust, widely accepted methodology. Employment need and supply is also discussed within the supporting evidence - Economic Forecasts for Greater Manchester [05.01.01]; and Employment Topic Paper [05.01.04].</p> <p>Two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p>
4	Site doesn't meet the site selection criteria and the site selection process has been developer-led.	The proposed strategic allocations have been chosen following a robust site selection exercise - see Site Selection Background Paper [03.04.01] .
5	Housing need calculations are based on out-of-date household projections and do not take into account the impacts of Covid and Brexit. In addition, the	The housing methodology is covered in the Housing Background Paper (06.01.03) . 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

	Government's standard housing methodology is not mandatory.	there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] .
6	Need is for affordable homes not executive homes.	Policy JP-H2 sets out the approach to affordability of new housing, with detailed policy requirements to be set at the local level for each district.
7	The number of proposed new houses around the Slattocks area has increased from 900 to 1680 without any detailed evidence.	The Stakehill Topic Paper [10.01.56] outlines in Section F the reasons for the increase in new houses proposed. In addition, evidence has been produced in relation to the housing need and demand over the life-time of the plan period. See supporting evidence Housing Topic Paper [06.01.03] ; and Greater Manchester Strategic Housing Market Assessment [06.01.02] .
8	Proposals will lead to the loss of biodiversity and ecological habitats. Negative impact on wildlife some of which are protected species.	A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE [10.05.31] . 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 have informed the allocation policy which states that development will be required to retain and where possible enhance areas of biodiversity within the area and carry out a project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more. In addition, Policy JP-G9 sets out the approach regarding biodiversity and geodiversity and states that across the plan as a whole, a net enhancement of biodiversity resources will be sought.
9	The proposal will lead to increased flooding, land acts as a soak away.	Section B, part 11 of the Stakehill Topic Paper [10.01.56] summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) and the 2020 Level 2 SFRA. The conclusions were that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage. In addition, Policy JP-S5 outlines the approach to protecting the quantity and quality of water bodies and managing flood risk.
10	The scale of development will remove village / rural feel and dwarf what is here and destroy the amenity, identity, character and visual characteristics of the area.	Criteria 3 of JP Allocation 2 states that development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development and Criteria 14 adds that development will be required to ensure that the existing settlements and pockets of housing are taken fully into account through the masterplanning of the area.
11	The impact of the road infrastructure, including SRN, will be too great.	Transport Locality Assessment – [09.01.07] (pages C53 to C57) – GMSF2020 and Transport Locality Assessment Addendum – [Cross Boundary Allocations (2) Northern Gateway (Stakehill)] [09.01.18] (pages 32 to 38) provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 [09.01.01] and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] . We are also working alongside National 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.

12	No demand for new station at Slattocks.	Paragraph 11.48 of the supporting text to JP Allocation 2 notes that the opportunity for a railway station at Slattocks is currently being investigated further. This is demonstrated in the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 09.01.02 which states in paragraph 120 that over the next five years TfGM aim to complete business cases for the early delivery of stations in a number of locations including Slattocks.
13	Will result in an increase of HGVs – will create road safety issues for pedestrians and cyclist – serious accidents already common near Slattocks roundabout.	Criteria 13 of JP Allocation 2 states that development will be required to improve access arrangements in and around Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible. In addition, JP-C6 outlines ways in which the plan will support the more efficient and sustainable movement of freight and JP-C7 gives further information on making the appropriate provision for deliveries and servicing in ways that meet road safety requirements and reduces traffic congestion.
14	No detailed evidence regarding how existing infrastructure could cope, such as roads, utilities, schools, drainage and medical practises. GPs, schools and roads at capacity and roads not maintained.	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. Policy JP Allocation 2 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.
15	Loss of open land will have a negative impact on physical and mental health.	As set out in the Stakehill Allocation Topic Paper [10.01.54] the Integrated Assessment [02.01.02, 02.01.04, 02.01.05] has incorporated a Health Impact Assessment. Stakehill scored significantly positive for supporting a healthier lifestyle and improvements in health and promoting access to green space and positive in relation to ensuring people are adequately served by health care facilities (page 128, 02.01.05). In addition, Policy JP-6 sets out ways that new development can help tackle health inequality.
16	The proposals do not sufficiently take climate change into account – proposals will result in increased emissions, congestion and air pollution.	The site was subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators. In addition, JPA 2 Criteria 20 states that development of the site will be required to incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors. See the allocation topic paper for further detail in regard to air quality [10.01.56] chapter 21, pages 32-33]. Policies elsewhere in the Plan, particularly within Chapter 5, provide policy requirements in relation to this matter.
17	Concerns in relation to the impact of this allocation on the setting and character of these designated heritage assets, particularly given that the development will fundamentally change the character of the wider local area.	Section C, Part 20, of the Stakehill Topic Paper 10.01.56 summarises the supporting evidence in relation to the historic environment. Criterion 4 of Policy JP Allocation 2 requires the design of the scheme preserves or enhances the setting of the listed St John's Church and war memorial in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated assessment submitted as part of the planning application process.
16	Concerns regarding noise pollution	JPA 2 Criteria 20 states that development of the site will be required to incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors.
19	Cannot afford to lose this farm land. Need the land more than ever since leaving the EU. Do not destroy	Criteria 7 of policy JP-G9 seeks to safeguard the best and most versatile agricultural land. However, the last sentence of paragraph 8.53 of the supporting text states given the overall scale of development that needs to be accommodated a limited

	<p>the forever the chances of that land being used for useful food production. Removing this farmland is in opposition to the food security of our region.</p>	<p>amount of development on high grade agricultural land is necessary as it is critical to the delivery of wider development proposals.</p> <p>Two assessments of the potential impacts of Brexit (and Covid-19) on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p>
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Chapter 11 - Strategic Cross Boundary Allocations

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

Policy GM Allocation 3.1: Roundthorn Medipark Extension

Row	Main Issue	PfE Response
1	No need for allocation due to existing empty units and the proposals would lead to over-development of the area.	No change is considered necessary. The level of office development proposed in the Plan is considered consistent with the sustainable location of the core growth area and the wider evidence base, in particular the Employment Land Needs in Greater Manchester [05.01.02] and COVID-19 and Places for Everyone Growth Options [05.01.03]
2	There is a need to retain Green Belt to prevent urban sprawl and to keep separation from the Airport. No exceptional circumstances have been demonstrated for the proposals	No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA3.1 Medipark Allocation Topic Paper (10.01.57) .
3	The additional development would lead to excessive traffic and congestion in the area. 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	No change is considered necessary. The policy includes in clauses 5,6 and 7 requirements for transport mitigation that address the concerns raised. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.

Row	Main Issue	PfE Response
		<p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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>
4	<p>The allocation has no specific ecological surveys or ecological appraisal undertaken on the site. No specific mention of biodiversity constraints. There is a need for ecological mitigation/compensation must lead to a 10% uplift in biodiversity value/ check for presence of Lapwings. Any development of the site requires high quality natural landscaping, including the provision of appropriate native species.</p> <ul style="list-style-type: none"> The cumulative effect of the adjacent development at Timperley Wedge must also be taken into account on the biodiversity of the area. 	<p>The policy for the allocation incorporates wording that aligns with the mitigation suggested in the Integrated Appraisal – Main Report (02.01.02). Moreover, Policy JP – G9 in the plan picks up on biodiversity net gain.</p> <p>The policy identifies at clause 9 the need to deliver high quality natural landscaping, including the provision of native species, adjoining the brook to help mitigate flood risk and promote biodiversity and green infrastructure and no change is therefore considered necessary.</p>
5	<p>Sustainable Urban Drainage Systems (SUDS) should be required; foul and surface water drainage needs to be addressed; Non-domestic buildings will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate.</p>	<p>No change is considered necessary. Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. Therefore, no change to the plan is considered as necessary.</p>
6	<p>There is potential flood risk in the proposed allocation area.</p>	<p>The GM SFRA Level 1 Appendix C - Development Sites Assessments Summary Reports (04.02.13) and the accompanying spreadsheet - GM SFRA Level 1 Appendix B Sites Assessment Part 2.xlsx (04.02.12) identify that the site falls within Strategic Recommendation C - consider site layout and design around the identified flood risk if site passes Sequential Test, as part of a detailed FRA or drainage strategy.</p>
7	<p>The allocation should be considered alongside Timperley Wedge to account for joint development potential and the impact on nature/biodiversity/wildlife</p>	<p>Joint working between Manchester and Trafford councils will continue as the proposed allocations are further developed.</p>

Row	Main Issue	PfE Response
8	Little detail on infrastructure and how it will be paid for.	No change is considered necessary. 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. The Plan needs to be read as a whole, therefore no change is considered necessary.
9	Site selection process opaque with no explanation as to why some sites in the call for sites were not selected.	The Site Selection Background Paper (03.04.01) identifies that Medipark meets criteria 2, 5 and 6. The Background Paper sets out the steps undertaken to identify and consider sites.
10	Proposals would be harmful to the historic environment/archaeology with a recommendation that the policy refers to the heritage assessment undertaken.	No change is considered necessary. The policy, at clause 8, refers to the need to incorporate suitable site mitigation to account for the historic landscape features within the site.

Chapter 11 – Allocations: Cross-Boundary Strategic Allocations

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

PfE 2021 Policy JP Allocation 3.2 Timperley Wedge

Row	Main Issue	PfE Response
1	Concerned that insufficient evidence has been presented to demonstrate certainty of delivery of the scale of development in Plan period when taking into account timings for infrastructure, complicated landownerships and HS2.	<p>No change is considered necessary. It is considered the allocation can be delivered in line with industry best practice as set out in more detail in section 27.0 of the JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58].</p> <p>The Council have been working with a group of major landowners of land in the Timperley Wedge allocation for a number of years, jointly producing and funding the Masterplan for the Timperley Wedge Allocation [10.01.23]. An adopted masterplan/SPD is a requirement of policy JPA 3.2 and will provide details of infrastructure delivery.</p> <p>The allocation is not dependant on HS2 and this is set out in more detail in the Masterplan for the Timperley Wedge Allocation [10.01.23]. Section 6 of the masterplan sets out an option for development without HS2.</p>
2	The loss of Green Belt at Timperley Wedge is too great. There is not enough focus on brownfield sites elsewhere and the consideration of alternatives.	<p>No change is considered necessary. The PfE Plan sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF 119. The supply of brownfield land has been maximised and around 90% of new housing is being met within the urban area. 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 exceptional circumstances for development have been provided in the Green Belt Topic Paper [07.01.25], for Timperley Wedge (Appendix 2 page 44). The development boundaries for the Timperley Wedge allocation were proposed after careful consideration of the evidence. More detail is set out in JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58] and the Masterplan for the Timperley Wedge Allocation [10.01.23].</p> <p>The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10], and the consideration of alternatives in the Site Selection Background Paper [03.04.01], and within section 5 of the JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58].</p>

Row	Main Issue	PfE Response
3	Concern that development will significantly harm wildlife, SBIs, result in a loss of open space and sports facilities and effect residents' amenities and health.	No change is considered necessary. Chapter 8 of PfE sets out policy protection and enhancement of natural environment assets including SBIs, woodland, and hedgerows. Policy JP-G 9 seeks a net enhancement of biodiversity resources across the plan as a whole. Policy JP-A 3.2 Timperley Wedge also requires development to deliver a clear and measurable net gain in biodiversity, protects open spaces (e.g. Manor Farm) and requires new green infrastructure and facilities to meet the needs of new residents. Habitat assessments will be carried out through the planning application process to protect/mitigate any harm as appropriate. More information on potential enhancements is set out in the Stage 2 Greater Manchester Green Belt Study – Identification of Opportunities to Enhance the Beneficial use of the GM Green Belt (2020) [07.01.12] and JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58].
4	There is an impact on existing communities with already congested roads and infrastructure. More details are needed on mitigation particularly on the spine road and its interactions with Manchester Airport.	<p>No change is considered necessary. Policy JPA 3.2 sets out a requirement for new development to be integrated with existing development and is in line with JP-G6, JP-P1 and Policy JP-D2 which states each allocation must also meet the needs of its own infrastructure requirements. Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation including a new spine road and extensions to bus services as well as new cycling and walking routes to encourage more active transport. See JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58]. As Timperley Wedge is adjacent to Medipark allocation more detailed information on the cumulative transport impacts of both allocations and improvements for junctions around Manchester Airport have been considered in the Transport Locality Assessments Cross boundary [09.01.07] and Transport Locality Assessments Addendum [09.01.19]. Indicative infrastructure layouts and provision can be seen in the Timperley Wedge masterplan [10.01.23]. More work will be done on infrastructure as part of detailed masterplanning prior to development.</p> <p>New and improved public transport and active travel infrastructure needed by the development is set out in Policy JP3.2. The Western Leg Metrolink extension will provide a link from Timperley Wedge to the existing Metrolink network and Manchester Airport. It is envisaged the spine road will be delivered incrementally by the development as and when it requires access from it. More detail can be found in the Masterplan for the Timperley Wedge Allocation [10.01.23].</p>
5	The scale of development will negatively impact existing communities and social infrastructure, e.g. shops, medical services, schools.	No change is considered necessary. Social infrastructure requirements are highlighted in the Timperley Wedge policy JPA 3.2. In line with Policies JP-G6, JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including, where appropriate, medical facilities, education provision etc. The scale of development in the Local Centre is set out in Policy JPA 3.2 criteria 13 and should meet the needs of new residents. More work will be done on infrastructure as part of detailed masterplanning prior to development.

Row	Main Issue	PfE Response
6	<p>The requirement for 45% affordable housing is not flexible enough and justified given the high level nature of the viability assessment.</p> <p>Clarity is needed on how developer contributions will be calculated and used to fund infrastructure.</p>	<p>No change is considered necessary. A Strategic Viability Assessment has been undertaken for the whole of PfE, including the allocations (see [03.01.01 – 03.01.04]). Also see the viability section of the JPA3.2 Timperley Wedge Allocation Topic Paper [10.01.58]. This has demonstrated that a minimum 45% affordable housing contribution is viable and meets the affordable housing needs identified in Trafford's Housing Needs Assessment (December 2019) (Trafford-HNA-2019-Final-Report.pdf).</p> <p>However NPPF 58 provides provision for applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.</p> <p>An equalisation mechanism as required by Policy JPA 3.2 criteria 12 and the masterplan/ SPD will set out the methodology for planning obligations to be calculated and distributed in a fair and proportionate way.</p>
7	<p>The policy is unduly detailed and prescriptive.</p>	<p>Timperley Wedge is a strategically important allocation for Greater Manchester, and is a significant opportunity to deliver a site for substantial housing and employment development. Given the scale of the development proposed, it is important the key policy principles are embedded within the allocation. No change is considered necessary.</p>
8	<p>Concern about increased flooding as a result of development.</p>	<p>No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.</p>

Chapter 11 – Allocations (Bolton)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Bolton) to PfE 2021 are set out below.

PfE 2021 Policy JPA4 – Bewshill Farm

Row	Main Issue	PfE Response
1	Concern over the loss of green belt land for an employment site.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Bewshill Farm. These are outlined in paragraph 14.7 of the Bewshill Farm Topic Paper [10.02.05] and fully outlined in the Green Belt Topic paper [07.01.25].</p>
2	Development will increase heavy traffic into the area including HGV's and commuting traffic, which will worsen the existing congestion.	<p>Paragraph's 10.12 and 10.13 of [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper outline that the Locality Assessment concludes that traffic impacts are less than severe and that the allocation is considered deliverable with the proposed mitigation measures in place.</p> <p>No change is considered necessary because these mitigations are addressed through policies JPA4 and JPC7. These are considered to be robust policies, supported by a proportionate evidence base.</p>
3	Existing physical infrastructure and utilities cannot cope with new developments. Infrastructure will need to improve before any further units are built.	<p>No change is considered necessary because a number of policies in the plan provide a sufficient policy framework to address this matter, such as JP-P1 (energy, water, drainage and green spaces) and JP-D2 (developer contributions). The plan needs to be read as a whole.</p> <p>As outlined in [12.02.05] JPA4 Bewshill Farm Topic Paper this allocation is located immediately adjacent to Logistics North which has a wide range of existing services and utilities (paragraph 13.1).</p>

Row	Main Issue	PfE Response
4	Ecology and Biodiversity Uplift - the allocation policy should specifically address ecological and biodiversity issues.	<p>A number of policies in the plan provide a sufficient policy framework to address this matter, such as policy JP-G9. The plan needs to be read as a whole, therefore no change is considered necessary.</p> <p>It is considered that policy JP-G9 is a robust policy supported by a proportionate evidence base. Further information on the allocation and policy JP-G9 can be found here:</p> <ul style="list-style-type: none"> - [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper (paragraph's 18.0-18.3). - [07.01.26] Natural Environment Topic Paper
5	Concern about air, light and noise pollution.	<p>As outlined in paragraph 21.2 of [10.02.05] JPA4 Bewshill Farm Allocation Topic Paper the site is not within an Air Quality Management Area.</p> <p>In terms of mitigation criterion 3 of Policy JPA4 requires that the development contributes to the Logistics North local link demand responsive transport service and criterion 4 requires high quality landscaping especially along its prominent frontage with the A6.</p> <p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-S6 and JP-C7.</p> <p>Issues can be addressed at planning application stage. Any proposals will need to consider appropriate mitigation. No change is considered necessary.</p>

PfE 2021 Policy JPA5 – Chequerbent North

Row	Main Issue	PfE Response
1	Concern over the loss of green belt in Bolton for an employment site. The site should be maintained as Green Belt land due to the important purpose it serves.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Chequerbent North. These are outlined in paragraph 14.8 of the Chequerbent North Allocation Topic Paper [10.02.06] and fully outlined in the Green Belt Topic paper [07.01.25].</p> <p>No change is considered necessary.</p>
2	The traffic in and around Westthoughton, M61 junction 5 and Chequerbent Roundabout is gridlocked and traffic backs up onto the motorway. The proposals will only increase traffic including HGV's.	<p>As outlined in paragraph's 10.5-10.7 of [10.02.05] JPA5 Chequerbent North Allocation Topic Paper the Locality Assessment gave an indication that Chequerbent North is suitable for allocation, however, further work is required to progress with a scheme at Chequerbent Roundabout. Workable solutions are considered feasible.</p> <p>Paragraph 10.4 of [10.02.05] JPA5 Chequerbent North Allocation Topic Paper summarises the mitigation considered necessary in the [09.01.08] Transport Locality Assessments – Bolton – GMSF and [09.01.20] Transport Locality Assessments Addendum – Bolton. No change is considered necessary because these mitigations are addressed through policies JPA4 and JPC7. These are considered to be robust policies, supported by a proportionate evidence base.</p>
3	Site access arrangements. Criterion 2 of Policy JPA5 states that development at the site will be required to be accessed from the A6, with a potential access via Snyderdale Way, subject to detailed highway design considerations. The landowner Peel regards this as too prescriptive and is seeking a more flexible wording to allow a potential access from M61 junction 5 reflecting its emerging plans.	<p>Access arrangements are addressed in criteria 2 and 3 of Policy JPA5. Policy JPA5 is considered to be a robust policy supported by a proportionate evidence base, which can be found here:</p> <p>[10.02.06] JPA5 Chequerbent North Allocation Topic Paper (Section 10, page 12)</p>

Row	Main Issue	PfE Response
		<p data-bbox="1460 235 2724 268">[09.01.08] Transport Locality Assessments – Bolton (Appendix B – paragraphs 10.1.1 – 10.1.4).</p> <p data-bbox="1460 340 2178 373">[10.02.02] JPA5 – Development Framework (page 26)</p>
4	With a decline in wildlife and habitats, we need to ensure Biodiversity Net Gain.	<p data-bbox="1460 394 2748 529">A number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-G9. Policy JP-G9 is considered to be robust and supported by a proportionate evidence base. Further information on the allocation and policy can be found here:</p> <p data-bbox="1460 600 2041 634">[07.01.26] Natural Environment Topic Paper</p> <p data-bbox="1460 705 2540 739">[10.02.06] JPA5 Chequerbent North Allocation Topic Paper (paragraph's 18-18.3)</p> <p data-bbox="1460 810 1988 844">[10.02.01] JPA5 Ecological Assessment</p> <p data-bbox="1460 915 2012 949">[10.02.02] JPA5 Development Framework</p> <p data-bbox="1460 1020 2588 1054">The Plan needs to be read as a whole, therefore no change is considered necessary.</p>
5	Proposed development would bring about high levels noise and air pollution along the M61 Corridor. This will only worsen due to the increase of HGVs/traffic.	<p data-bbox="1460 1066 2760 1150">As outlined in [10.02.06] JPA5 Chequerbent North Allocation Topic Paper the site lies immediately adjacent to but outside the Air Quality Management Area.</p> <p data-bbox="1460 1222 1905 1255">In terms of air pollution mitigation:</p> <ul data-bbox="1460 1276 2772 1747" style="list-style-type: none"> <li data-bbox="1460 1276 2772 1360">- [10.02.02] JPA5 Development Framework states that the proposed delivery of the Westhoughton bypass will improve traffic flows and enhance air quality <li data-bbox="1460 1402 2635 1436">- A travel plan will encourage people working at the site to use sustainable travel options. <li data-bbox="1460 1478 2671 1562">- Criterion 3 of Policy JPA5 requires good access to the site by public transport walking and cycling. <li data-bbox="1460 1604 2730 1688">- Criterion 4 of Policy JPA4 requires financial contribution to mitigate impacts on the Local Road Network <li data-bbox="1460 1730 2487 1764">- Criterion 5 requires landscaping and the retention of trees along boundaries. <p data-bbox="1460 1843 1947 1877">In terms of mitigating noise pollution:</p>

Row	Main Issue	PfE Response
		<p>- [10.02.02] JPA5 Development Framework states in paragraph 5.24 that appropriate buffers and necessary attenuation measures can be incorporated into the development to ensure that noise within the buildings is within acceptable limits</p> <p>- Criterion 5 of Policy JPA5 requires landscaping and retention of trees along boundaries.</p> <p>In addition, a number of policies in the Plan provide a sufficient policy framework to address this matter, such as policy JP-S6 and JP-C7.</p> <p>Issues can be dealt with at planning application stage. Any proposals will need to consider appropriate mitigation.</p> <p>No change is considered necessary.</p>
6	Lack of supporting infrastructure. Infrastructure and civil society implications not fully considered.	<p>No change is considered necessary because a number of policies in the plan provide a sufficient policy framework to address this matter, such as JP-P1 (energy, water, drainage and green spaces) and JP-D2 (developer contributions). The plan needs to be read as a whole.</p> <p>As outlined in paragraph 5.27 of [10.02.02] JPA5 Development Framework Chequerbent North can be satisfactorily connected to the key utilities.</p>

PfE 2021 Policy JPA6 – West of Wingates / M61 Junction 6

Row	Main Issue	PfE Response
1	Industrial and warehousing floorspace employment can be accommodated on brownfield land including vacancies on the current Wingates Industrial Estate. Exceptional circumstances are not justified for Green Belt release.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>There are allocation specific exceptional circumstances for releasing the Green Belt at Allocation JPA6. These are outlined in paragraph 14.13 of the JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper [10.02.07] and fully outlined in the Green Belt Topic paper [07.01.25].</p>
2	Transport – concerns over increased traffic congestion due to increased workforce and HGV's	<p>As outlined in paragraph 10.11 of [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper the Locality Assessments conclude that the traffic impacts of the proposed development are less than severe and the allocation is deliverable with the proposed mitigation measures in place. The mitigation measures necessary are summarised in paragraph 10.7. These mitigations are addressed through policies JPA6 and JP-C7.</p> <p>Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base, which can be found here:</p> <p>-[09.01.08] Transport Locality Assessments – Bolton – GMSF (Appendix C) -[09.01.20] Transport Locality Assessments Addendum – Bolton (Section 6)</p>
3	As the area is on a slope the warehouses will be visible from a great distance. It should be ensured that the siting and scale of buildings minimises the impact on long range views. Negative impact on neighbouring properties, including the valuation of homes.	<p>Criteria 6, 7, 8 and 9 of Policy JPA6 provide mitigation in relation to these issues. Criterion 2 requires development to be in accordance with an agreed comprehensive masterplan. Policy JPA6 is considered to be a robust policy supported by proportionate evidence.</p> <p>[10.02.04] JPA6 - Supporting Information (paragraph 5.41) outlines that means of mitigating and softening impact on the landscape are to be incorporated in the masterplanning process, including the retention and creation of buffer strips, amenity areas and screen planting.</p>

		<p>Further information can be found in [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper (paragraph 17.1-17.2, pages 32-33)</p> <p>No change is considered necessary.</p>
4	<p>Loss of biodiversity. The proposed development would have a negative effect on wildlife, including some rare wildlife, in the area. Cumulative impacts on ecology must be fully considered.</p> <p>The land is important for biological connectivity between species groups and there are many quiet ponds supporting newts, toads and other wildlife. It connects up directly to the fields around the nearby Borsdane Wood - semi natural ancient woodland (1600AD) and LNR.</p>	<p>No change is considered necessary. Criterion 7 of Policy JPA6 protects the Site of Biological Importance at Four Gates and includes the retention of existing woodland, hedgerows and ponds where practicable. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base. The evidence base specific to Allocation JPA6 can be found here:</p> <ul style="list-style-type: none"> - [10.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic paper (paragraph's 18.1-18.8) - [10.02.04] JPA6 – Supporting Information <p>Criterion 2 of Policy JPA6 requires development to be in accordance with an agreed comprehensive masterplan.</p> <p>In addition a number of policies in the Plan address this matter, such as policy JP-G9 and JP-G7. The Plan needs to be read as a whole.</p>
5	<p>The development would affect historic hedgerows and many mature trees.</p>	<p>Criterion 7 of Policy JPA6 addresses the retention of existing trees and hedgerows and criterion 2 requires development to be in accordance with an agreed comprehensive masterplan which shows which areas should and should not be developed. Policy JPA6 is considered to be a robust policy, supported by a proportionate evidence base.</p> <p>Paragraph 5.46 of [10.02.04] JPA6 – Supporting Information states that further work will be undertaken to assess historic hedgerows and whether Holden Wood can be designated as an ancient woodland.</p> <p>Policy JP-G7 also provides safeguards in relation to this matter. The Plan needs to be read as a whole. No change is considered necessary.</p>

6	The development will increase carbon emissions, damaging the environment and contributing to climate change.	No change is considered necessary. Criterion 5 of policy JPA6 addresses the enhancement of public transport, demand responsive transport and walking and cycling facilities. This issue is also addressed through Policy JP-S2. The Plan needs to be read as a whole.
7	Noise, air, light and visual pollution have all been raised as concerns.	Criteria 8 and 9 of Policy JPA6 address air, noise and light pollution. Policy JPA6 is considered to be a robust policy supported by a proportionate evidence base. In addition Policy JP-S6 addresses this issue. The plan needs to be read as a whole. No change is considered necessary.
8	Lack of consideration for infrastructure. There are no plans to address the education, health and social issues Westhoughton is facing. There is no dedicated leisure centre, just the school out of school hours.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure. The Plan needs to be read as a whole.</p> <p>As outlined in [12.02.07] JPA6 West of Wingates M61 Junction 6 Allocation Topic Paper health and education infrastructure is not required because the allocation doesn't include any housing (paragraph's 23.1 and 24.1).</p> <p>No change is considered necessary.</p>
9	Harworth considers that a revised allocation boundary will result in a better layout of development and undeveloped areas, enhanced deliverability of development and road infrastructure, improved configuration of drainage infrastructure, landscape enhancement and public accessibility.	Harworth's suggested boundary is not supported for the reasons set out in paragraph 5.4 of [12.02.07] JPA6 West of Wingates M61 junction 6 Allocation Topic Paper.

Chapter 11 – Allocations: Bury Strategic Allocations

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

Places for Everyone – Summary of Key Issues raised in relation to proposal at Elton Reservoir (JPA7)

Row	Key Issue	Response
1	Object to the loss of Green Belt/green space	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
2	Housing will not be affordable	No change necessary. The ambition for the site has always been to maximise the potential for the delivery of affordable housing [in line with local affordable housing policy requirements]. As summarised in the JPA9 (Walshaw) Topic Paper [10.03.45] , an affordable housing contribution of 25% has been shown to be deliverable. Development proposals on this site would be subject to further viability assessment(s) at the detailed application stage, taking into account policy requirements in place at that time.
3	Site doesn't meet the site selection criteria and the site selection process has been developer-led.	No change necessary. The proposed strategic allocations have been chosen following a robust site selection exercise – the methodology for which is set out in the Site Selection Background Paper [03.04.01] .
4	Object to the release of Green Belt for 3,500 homes when only 1,900 can be delivered within the plan period.	No change necessary. Although the allocation has the capacity to deliver a total of around 3,500 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will still be able to come forward beyond the plan period.
5	There is no need to release Green Belt when there is an adequate supply of brownfield sites.	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment

		Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
6	The proposal conflicts with the climate emergency.	No change necessary. The Integrated Appraisal (IA) Scoping Report [02.01.01] notes that the declaration of climate emergencies by GMCA and the 10 local authorities was the most significant shift since the previous update to the Scoping Report. The IA objectives and criteria particularly related to climate emergency were carefully considered to establish whether there has been a material change requiring an amendment. As a result of the update, it is concluded that no additions or changes are required to the IA at this stage.
7	Housing need calculations are based on out-of-date information i.e. 2014 household projections and do not take into account the impacts of Covid and Brexit. In addition, the Government's standard housing methodology is not mandatory.	No change necessary. NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.
8	The proposed Elton Parkland does not compensate for the loss of Green Belt.	No change necessary. The proposed removal of Green Belt from the Elton allocation has been informed by several studies undertaken by LUC and the summary of these can be found in the Elton Allocation Topic Paper [10.03.43] . Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation to provide health benefits to residents as well as creating a visually attractive environment. This should include the enhancement and the integration of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal to create an extensive recreation, tourism and leisure asset.
9	The site will not be delivered as anticipated.	No change necessary. Details of the anticipated phasing for the Elton Reservoir site are set out in section 27 of the Site Allocation Topic Paper for Elton Reservoir [10.03.43] .
10	The site is located on the opposite side of the Borough to the	No change necessary.

	proposed employment development at the Northern Gateway.	Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] .
11	The proposal will have an adverse impact on local roads and the wider network leading to increased congestion and air pollution.	<p>No change necessary.</p> <p>Bury's Locality Assessment [09.01.09] concludes the implementation of a number of mitigation schemes will be sufficient to mitigate against the increased traffic generated by the Elton proposal.</p> <p>In addition, PfE Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for key enabling infrastructure, including off-site highway works where these are necessary to ensure acceptable traffic movement, including works in and around Radcliffe town centre.</p>
12	The site is poorly served by public transport.	<p>No change necessary.</p> <p>PfE Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for major investment in public transport infrastructure to enable more sustainable transport choices.</p> <p>Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026.</p>
13	Transport evidence is incomplete and does not identify in sufficient detail the nature, scale and timing of infrastructure requirements at the SRN.	<p>No change necessary.</p> <p>Bury's Transport Locality Assessments [09.01.09] and [09.01.21] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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>
14	Utilities infrastructure will not be able to cope with increased demands.	<p>Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for the key enabling infrastructure necessary to support the development of the site.</p> <p>A number of other policies in the Plan provide a sufficient policy framework to address this matter by requiring new development to be supported by the necessary infrastructure. The Plan needs to be read as a whole, therefore no change is considered necessary.</p>

15	Need more information on how infrastructure will be funded.	No change necessary. Chapter 12 of PfE covers the delivery of the plan and sets out information on an Infrastructure Strategy, delivering new infrastructure, funding etc.
16	There is a lack of healthcare and educational infrastructure to support the development.	No change necessary. Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for the key enabling infrastructure necessary to support the development of the site. A number of other policies in the Plan provide a sufficient policy framework to address this matter by requiring new development to be supported by the necessary infrastructure.
17	Proposals will lead to the loss of biodiversity and ecological habitats and wildlife and environmental surveys have not been done correctly.	No change necessary. The proposed site allocation at Elton Reservoir is supported by a range of evidence on wildlife and ecological matters [10.03.05 , 10.03.06 , 10.03.07 , 10.03.08 , 10.03.09 , 10.03.10 , 10.03.11] Ecological/biodiversity matters associated with the Elton Reservoir site are also summarised in section 19 of the Elton Reservoir Allocation Topic Paper [10.03.43]. In addition, Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to minimise the impact on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'.
18	Loss of open land will have a negative impact on physical and mental health.	No change necessary. Policy JPA7 (Elton Reservoir) requires that new development on the site will be required to make provision for a significant green corridor which remains within the Green Belt and provides a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation to provide health benefits to residents. Policy JP-P6 sets out the requirements for new development in seeking to help tackle health inequalities, including the need for all developments that require an Environmental Impact Assessment to also be supported by a Health Impact Assessment.
19	The proposal will lead to increased flooding.	No change necessary. Policy JPA7 (Elton Reservoir) states that new development on the site will be required to ensure the allocation is safe from and mitigates for potential flood risk from all sources including the River Irwell, Elton and Withins Reservoir and surface water and does not increase the flood risk elsewhere. This is supported by thematic Policy JP-S5 relating to flood risk and the water environment.
20	Need to consider heritage assets within the site.	No change necessary. Policy JPA7 (Elton Reservoir) states that new development on the site will be required to protect and, where appropriate, enhance heritage and archaeological assets and their setting, including the Old Hall Farmhouse Grade II listed building and wider historic character of the surrounding area, in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.

Places for Everyone – Summary of Key Issues raised in relation to proposal at Seedfield (JPA8)

Row	Key Issue	Response
1	Objection to principle of allocation and removal of site from Green Belt.	<p>No change necessary.</p> <p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p>
2	Concern that proposed homes will not be affordable.	<p>No change necessary.</p> <p>The ambition for the site has always been to maximise the potential for the delivery of affordable housing [in line with local affordable housing policy requirements]. As summarised in the JPA8 (Seedfield) Topic Paper [10.03.44], an affordable housing contribution of 25% has been shown to be deliverable. Development proposals on this site would be subject to further viability assessment(s) at the detailed application stage, taking into account policy requirements in place at that time.</p>
3	Housing target is not set by government and is not mandatory	<p>No change necessary.</p> <p>NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.</p>
4	There is no evidence to support the assumed capacity of 140 homes as the site has not been subject to masterplanning work or take into account the effect of the requirements for retention or delivery of recreation facilities, improvements to the wildlife corridor and green infrastructure upon the developable area.	<p>No change necessary.</p> <p>In total the allocation measures 5.15 ha with an approximate developable area of 3.46 ha meaning that the proposal represents a density of around 40 dwellings/ha.</p> <p>Policy JPA8 (Seedfield) also includes provision to ensure that any development on the site retains and enhances and/or replaces existing recreation facilities on the site. The capacity for housing on the site will clearly be determined by the approach to retaining or replacing the existing recreational facilities on the site.</p>
5	The availability of the site and timescales for delivery is questioned due to the requirement for a replacement site and the fact that a	<p>No change necessary.</p> <p>Policy JPA8 (Seedfield) includes provision to ensure that any development on the site retains and enhances and/or replaces existing recreation facilities on the site.</p>

	replacement site would be the responsibility of any future developer to secure. Land owners would be willing to provide sufficient land to deliver the replacement playing pitches and facilities on their site at Gin Hall as part of an allocation for residential development.	
6	The most up to date housing figures should be used. The current housing figures are out of date and ignores the potential impact of Brexit and Covid-19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.	<p>No change necessary.</p> <p>NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.</p> <p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p>
7	There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided.	<p>No change necessary.</p> <p>Section 27 of the Seedfield Allocation Topic Paper [10.03.44] sets out the anticipated phasing of housing delivery on the Seedfield site.</p>
8	Generalised opposition to building on Greenbelt and that only Brownfield land should be used in order to stop fly tipping and antisocial behaviour. Brownfield sites are being ignored and should be used first.	<p>No change necessary.</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>
9	Building should only take place on the brownfield portion where the school is.	<p>No change necessary.</p> <p>Policy JPA8 (Seedfield) also includes provision to ensure that any development on the site retains and enhances and/or replaces existing recreation facilities on the site. The capacity for housing on the site will clearly be determined by the approach to retaining or replacing the existing recreational facilities on the site.</p>
10	Additional development would lead to likely congestion on the A56.	No change necessary.

		No strategic transport interventions have been identified for the allocation. However, a signalised junction at Walmersley Road could potentially be required if traffic modelling demonstrates that it is necessary and a secondary emergency access point into the allocation may also be required. Further work will be required to establish the exact nature of any transport interventions as the allocation moves through the planning process.
11	The transport network, specifically Parkinson Street, is already congested with traffic going to and from the Seedfield Centre on top of established community service activities of both St. John's Church Hall and Seedfield Bowling Club - both of which rely on Parkinson Street for parking. It is too small to cope with traffic from 140 new households.	No change necessary. No strategic transport interventions have been identified for the allocation. However, a signalised junction at Walmersley Road could potentially be required if traffic modelling demonstrates that it is necessary and a secondary emergency access point into the allocation may also be required. Further work will be required to establish the exact nature of any transport interventions as the allocation moves through the planning process.
12	A new and separate egress should be implemented so that there are two entrances and exits to the site.	No change necessary. No strategic transport interventions have been identified for the allocation. However, a signalised junction at Walmersley Road could potentially be required if traffic modelling demonstrates that it is necessary and a secondary emergency access point into the allocation may also be required. Further work will be required to establish the exact nature of any transport interventions as the allocation moves through the planning process.
13	Should provide active travel links to the Burrs Park and improved cycling infrastructure across Bury	No change necessary. Policy JPA8 (Seedfield) includes provision for the development of the site to ensure the design and layout allows for effective integration with surrounding communities, including active travel links to Burrs Country Park and employment opportunities in Bury Town Centre.
14	More detail required to show how significant infrastructure will be funded.	No change necessary. Chapter 12 of PfE covers the delivery of the plan and sets out information on an Infrastructure Strategy, delivering new infrastructure, funding etc.
15	These proposals would lead to a loss of wildlife and is unevidenced in biodiversity terms.	No change necessary. There are no known ecological issues on the allocation and it should be suitable for residential development in principle. There is, however, a wildlife corridor to the west and south of the allocation that will need to be retained and enhanced as part of any proposals. A detailed Ecological Assessment will be undertaken as part of any development proposals as necessary.
16	There would be a loss of recreation space, in particular playing pitches.	No change necessary.

	Any loss of playing field would be contrary to Sport England's Playing Fields Policy and paragraph 99 of the NPPF.	Policy JPA8 (Seedfield) includes provision to ensure that any development on the site retains and enhances and/or replaces existing recreation facilities on the site.
17	Concern that congestion will negatively impact air quality.	No change necessary. Section 22 of the Seedfield Allocation Topic Paper [10.03.44] include information regarding air pollution and there are a number of policies within the plan that seek to reduce exposure to pollution, including Policy JP-S4 (Resilience), JP-S6 (Clean Air), JP-G6 (Urban Green Space), JP-P1 (Sustainable Places) and those seeking to reduce the health impacts of air pollution through accessibility of sustainable travel such as public transport, cycling and walking.
18	The pitch is a soak away and will cause more water to directly go into the River causing future flooding down stream.	No change necessary. Section 12 of the Seedfield Allocation Topic Paper [10.03.44] sets out the situation with regard to flood risk associated with the site.
19	Concern that site-specific policies lack consistency of approach between authorities and do not set a clear expectation of the need to deliver high quality sustainable drainage and water efficient development and therefore require amendments which address inconsistencies in approach and set clearer expectations to ensure the policies more appropriately align with the ambition of Greater Manchester to be a city that is resilient to flooding and climate change.	No change necessary. Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.
20	Site selection process has not been clear and the rationale for the selection and rejection of each site should be available including considered alternatives.	No change necessary. The proposed strategic allocations have been chosen following a robust site selection exercise – the methodology for which is set out in the Site Selection Background Paper [03.04.01] .

Places for Everyone – Summary of Key Issues raised in relation to proposal at Walshaw (JPA9)

Row	Key Issue	Response
1	The setting of Walshaw village would be harmed. Separation required between existing and proposed properties.	No change necessary. Policy JP-P1 seeks to create sustainable places including the use of measures to ensure that new development is fully integrated into existing communities and that it makes a positive contribution to its coherence and character.
2	Loss of farmland that should be kept open as it offers local benefits e.g. residential amenity and improved health/wellbeing.	No change necessary. Policy JPA9 (Walshaw) states that the development of this site will be required to make provision for new, high quality, publicly accessible, multifunctional green and blue infrastructure within the allocation to provide health benefits to residents and to create a visually attractive environment. This should include the integration and enhancement of the existing green infrastructure corridors and assets at Walshaw and Elton Brooks. Policy JP-P6 sets out the requirements for new development in seeking to help tackle health inequalities, including the need for all developments that require an Environmental Impact Assessment to also be supported by a Health Impact Assessment.
3	The area is unsuitable for housing. Poor land stability due to past mining activity, culverted watercourses and natural springs are on-site. Evidence required addressing land stability/hydrology.	No change necessary. Section 13 of the Walshaw Allocation Topic Paper [10.03.45] summarises the ground conditions associated with the proposed site allocation.
4	The necessity for a comprehensive masterplan would lead to delays in the delivery of development.	No change necessary. The requirement for a masterplan to be approved by the LPA in advance of the submission of a planning application is intended to ensure that the LPA is fully satisfied with the intended development. It is considered that this will actually save time during the planning application process as key development parameters will have already been agreed.
5	The need to allocate sites within green belt is more pressing than currently set out in PFE.	No change necessary. NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.
6	The Walshaw site performs poorly against site selection criteria and only met one of the criteria for site selection whereas all	No change necessary. It is considered that the site at Walshaw meets the site selection criteria (Site Selection Topic Paper) as set out in the Walshaw Allocation Topic Paper [10.03.45]

	the objectives could be satisfied by any number of sites in the borough	
7	The site is in fact in multiple ownerships, there does not appear to be any evidence that land agreements between landowners are in place to enable the whole site to be delivered. The site is therefore not available.	No change necessary. The allocation is split into four separate outlets under the control of Himor (2 outlets), Redrow and Vernon and Co. Developments. Each parcel can be served by a separate access and can therefore be delivered simultaneously as described in the Walshaw Allocation Topic Paper [10.03.45] .
8	The affordable housing situation will not be addressed.	No change necessary. The ambition for the site has always been to maximise the potential for the delivery of affordable housing [in line with local affordable housing policy requirements]. As summarised in the JPA9 (Walshaw) Topic Paper [10.03.45] , an affordable housing contribution of 25% has been shown to be deliverable. Development proposals on this site would be subject to further viability assessment(s) at the detailed application stage, taking into account policy requirements in place at that time.
9	Housing targets are not mandatory.	No change necessary. NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.
10	The development of the site will not be delivered within the timescales anticipated.	Details of the anticipated phasing for the Walshaw site are set out in section 27 of the Walshaw Allocation Topic Paper [10.03.45] .
11	The plan uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid-19 on housing need and work patterns.	No change necessary. As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . NPPF and the PPG is clear that the starting point for housing targets is the Government's standard methodology for calculating Local Housing Needs (LHN). This is designed to provide local authorities with a clear and consistent understanding of the number of new homes needed in an area.
12	The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased survey of housing need.	No change necessary. Bury's HNDA is considered to be robust and credible evidence of the needs and demands for housing in Bury.
13	There is no need for any new housing when taking into account brownfield site capacities and vacant/unused housing.	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to

		meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
14	There isn't enough local employment to sustain such a big increase in housing.	No change necessary. A key aim of the plan's strategy is to rebalance the Greater Manchester economy and significantly boost economic output from the north. Part of this includes the identification of a strategic employment site at the Northern Gateway which will generate a significant amount of job opportunities accessible to Bury residents.
15	Places for Everyone proposes employment sites on the other side of the borough from Walshaw so should build more in the south of the borough to support the northern gateway	No change necessary. 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 [02.01.10]
16	Object to the loss of large amount of Green Belt which would be contrary to the purposes of Green Belt.	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
17	Green Belt land should be protected, not built on. Utilise brownfield land first and if Green Belt is still needed, scale down the level of development.	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]

18	There has been no evidence of the existence of exceptional circumstances to justify the alteration of the green belt boundaries to allow building on the Walshaw allocation as is required by the NPPF. Housing need is not an exceptional circumstance to justify the release of greenbelt.	No change necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]
19	Green belt areas to be added will not provide any benefit for those within the Walshaw area	No change necessary. It is considered that there are exceptional circumstances justifying the identification of new areas of Green Belt. The additions have not been identified as direct replacements, either in their extent or the use of the land identified, for the areas proposed for release through allocation(s) in the Plan. There is not therefore intended to be a direct correlation between the areas released from the Green Belt and those proposed as additions. The justification for the Green Belt additions proposed is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] .
20	There needs to be a more even distribution of green belt release rather than concentrated in 3 areas.	No change necessary. 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 [02.01.10]
21	Current rural views enjoyed will be significantly affected.	No change necessary. Policy JP-P1 seeks to create sustainable places including the use of measures to ensure that new development is fully integrated into existing communities and that it makes a positive contribution to its coherence and character.
22	Existing roads are at capacity and are in poor condition. There would be an impact on road safety, emergency services and businesses. Proposed highway solutions will not alleviate the situation.	No change necessary. Bury's Locality Assessment [09.01.09] concludes the implementation of a number of mitigation schemes will be sufficient to mitigate against the increased traffic generated by the Walshaw proposal.
23	Insufficient and vague infrastructure, particularly transport infrastructure, for Walshaw has been proposed, with no	No change necessary.

	sources of funding specified. The existing infrastructure could not cope with an increase in people and cars.	Bury's Locality Assessment [09.01.09] concludes the implementation of a number of mitigation schemes will be sufficient to mitigate against the increased traffic generated by the Walshaw proposal. All site allocations have been tested through the Stage 2 Viability Study [03.01.04] . Chapter 12 of PfE covers the delivery of the plan and sets out information on an Infrastructure Strategy, delivering new infrastructure, funding etc.
24	There is no evidence or viability testing to prove that this level of policy ask for infrastructure is deliverable on site in the timeframe and will not render the site unviable. Therefore, the site is not deliverable.	No change necessary. All site allocations have been tested through the Stage 2 Viability Study [03.01.04] .
25	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	No change necessary. Bury's Transport Locality Assessments [09.01.09] and [09.01.21] provide detailed information on the nature, scale and timing of infrastructure requirements at the SRN. With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF. In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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.
26	There is an inadequate sewerage system in Scobell Street area, which overflows in heavy rain. No policy reference to improving its capacity. United Utilities has not addressed this issue.	No change necessary. Section 12 of the JPA9 (Walshaw) Topic Paper [10.03.45] recognises that there have been historical instances of sewer flooding north of Scobell Street. United Utilities have advised that this is due to a number of factors including blockages in the existing culverts to the brook running alongside Scobell Street and drainage connections from developments north of Scobell Street. Regular maintenance including gully cleaning is carried out and Untied Utilities are currently undertaking works to remove highway drainage from the combined sewers to increase the capacity within the sewer.

27	Increased stress on schools, which are already inadequate, and at capacity and more clarity needed on new social infrastructure.	<p>Policy JPA9 (Walshaw) states that any proposals for this allocation must be in accordance with a comprehensive masterplan that has been previously approved by the LPA. It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development in line with Policy JP-D 1 'Infrastructure Implementation'.</p> <p>A number of policies in the Plan provide a sufficient policy framework to address this matter by requiring new development to be supported by the necessary infrastructure. The Plan needs to be read as a whole, therefore no change is considered necessary.</p>
28	Reference to a new local centre should be removed as no evidence has been presented to demonstrate a need for such facilities.	<p>No change necessary.</p> <p>It is considered that a development of this scale will require the provision of a new local centre in order to enable shorter and more sustainable journeys.</p>
29	Proposals would cause harm to the Special Landscape Area between the lodges.	<p>No change necessary.</p> <p>Paragraph 18.3 of the JPA9 (Walshaw) Topic Paper [10.03.45] identifies a series of opportunities to inform the evolving masterplan process, and to ensure the development can be incorporated successfully into the local landscape.</p>
30	Negative impact on key ecological sites and considerable loss of wildlife	<p>No change necessary.</p> <p>Ecological/biodiversity matters associated with the Walshaw site are summarised in section 19 of the Walshaw Allocation Topic Paper [10.03.45].</p> <p>Policy JPA9 also requires that development of the site will be required to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'.</p>
31	The plan will mean that we will be unable to meet climate change targets, air pollution targets and clean air strategies. Green Belt, tree and flood plains are needed to tackle climate change.	<p>No change necessary.</p> <p>Climate change is a key theme running throughout PfE and it is only through a combination of actions that it can be properly addressed. In particular PfE sets out:</p> <ul style="list-style-type: none"> - Methods to de-carbonise the city region through new and existing development, effective land management and through the provision of infrastructure and new technologies - The aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, including measures to ensure that all new homes and commercial/industrial buildings achieve net zero carbon by 2028 - The delivery of renewable and low carbon energy schemes through heat and energy network

		<ul style="list-style-type: none"> - Measures that will be taken in Greater Manchester to future proof the city region by mitigating and making it more resilient to environmental challenges, including climate change - Water based measures, such as reducing flood risk, to adapt and reduce the impacts of climate change - Measures to support improvements in air quality.
32	The policy is broadly supported but consider the policy needs to be strengthened to make it effective. The provision of recreation is cited but not sport.	Whilst it is considered that this proposed wording could improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed.
33	Concern that there will be no trees or fields left to soak up water and as such, the flood risk will inevitably increase.	No change necessary. Section 12 of the Walshaw Allocation Topic Paper [10.03.45] sets out flood risk issues connected to the site.
34	Air quality calculations are flawed.	No change necessary. An Air Quality Assessment for the Walshaw site [10.03.42] forms part of the evidence base for the proposed site allocation.
35	Concern that site-specific policies lack consistency of approach between authorities and do not set a clear expectation of the need to deliver high quality sustainable drainage and water efficient development and therefore require amendments which address inconsistencies in approach and set clearer expectations to ensure the policies more appropriately align with the ambition of Greater Manchester to be a city that is resilient to flooding and climate change.	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities 'to set out more detailed policies for specific areas, neighbourhoods or types of development'. Therefore, no change to the plan is considered as necessary.
36	The site is a flood plain with a long history of local flooding	No change necessary. The proposed allocation is located within Flood Zone 1. Section 12 of the Walshaw Allocation Topic Paper [10.03.45] sets out flood risk issues connected to the site.
37	Should preserve open spaces around Christ Church to retain setting.	No change necessary. Section 21 of the Walshaw Allocation Topic Paper [10.03.45] sets out the situation with regards to the historic environment. In addition, Policy JPA9 (Walshaw) states that any development on the site will be required to protect and, where appropriate, enhance heritage assets and their setting, including the Christ Church Grade II* listed building, in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process.

38	Policy wording amendments are required to ensure that there is clarity in respect of the appropriate contribution that is to be apportioned across the Allocation in line with an evidence based requirement, taking all viability considerations into account.	No change necessary. It is considered that the requirement for developer contributions across the allocation is clearly set out within Policy JPA9.
39	The policy wording should be amended to take into account viability and local requirements at the time of any application for both affordable housing provision and public transport improvements.	No change necessary. A strategic viability assessment, [03.01.01] 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.

Chapter 11 - Allocations

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

Policy GM Allocation 10: Global Logistics

Row	Main Issue	PfE Response
1	Expansion of air freight conflicts with need to tackle climate change	The allocation is intended to meet unmet employment land needs and does not deal with air travel. The impacts of additional flights is a matter for national and international policy – the UK Government published its green paper, “Aviation 2050 – the future of UK Aviation” in late 2018. The Government’s response to the consultation on the green paper is awaited.
2	The need for the allocation is questioned around factors including the impact of Covid 19; land already underutilised at the airport; employment growth should be more sustainably located in town / city centres; and allocation should only be used for business that genuinely depends on close proximity to the airport.	As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03]. There is a need to provide for additional employment opportunities in proximity to the airport with the specific case briefly set out at in section 2 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03) and the strategic case set out with respect for the need for additional industry and warehousing in the Employment Topic Paper (05.01.04).
3	There are many brownfield sites around the airport that could be considered for this kind of development.	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 [02.01.10]. The site was considered through the site selection process with details set out in the Site Selection Background Paper (03.04.01).
4	Scale of development should not be limited as set out, and accordingly the policy soundness is in question.	The figure in the policy is expressed as “around” to indicate an approximate number considered deliverable to meet development needs. Additionally, chapters 6 and 7 clearly set minimum targets for employment and housing development. The Plan should be read as a whole. Therefore it is not considered necessary to make any change to the policy.
5	Matters with respect to Green Belt raised including the case for exceptional circumstances not been demonstrated and the current function	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic

Row	Main Issue	PfE Response
	of Green Belt in the area to prevent urban sprawl	case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03).
6	Concerns raised about traffic congestion/inadequate public transport provision.	The policy includes in clauses 5,6 and 7 requirements for transport mitigation that address the concerns raised. The transport analysis in the Transport Locality Assessment – Manchester (09.01.10) has considered the transport impacts of the proposed allocation and suitable mitigation has been identified in section 13 of the assessment.
7	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>The Transport Locality Assessment – Manchester (09.01.10) provides detailed information on the nature, scale and timing of infrastructure requirements at the SRN.</p> <p>With respect to future assessments, the report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. 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>
8	Negative impacts identified resulting from the allocation on habitats, biodiversity and landscape.	<p>The advice with respect to mitigation received from GMEU is set out at in section 18 of the JPA10 Global Logistics Allocation Topic Paper (10.04.03)</p> <p>The policy should be read alongside other policies in the plan, in particular the policies in Chapter 8 (Greener Places) that set out the approach to landscape, green infrastructure and habitats.</p>
9	The airport currently causes significant air pollution and noise disturbance for residents in Woodford, as well as Heald Green, Gatley and Cheadle Hulme. This would be made worse by increased number of flights.	The impacts of additional flights is a matter for national and international policy – the UK Government published its green paper, “Aviation 2050 – the future of UK Aviation” in late 2018. The Government’s response to the consultation on the green paper is awaited.
10	The reference to high quality design and construction standards including the use of sustainable drainage	Water efficiency measures in new developments will be a matter for district local plans to determine. This approach is considered consistent with the NPPF, particularly paragraph 28 which confirms that it is for local planning authorities ‘to set out more detailed policies for specific areas, neighbourhoods or types of development’. Therefore, no change to the plan is considered as necessary.

Row	Main Issue	PfE Response
	<p>systems has been removed since the previous consultation on this policy. To support wider plan policies and objectives as well as for consistency reasons, we would support additional reference to the use of Sustainable Urban Drainage (SuDS) and a wider net gain approach for this site.</p>	
11	<p>Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.</p>	<p>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.</p>
12	<p>Potential flood risk, or contribution to flooding</p>	<p>The GM SFRA Level 1 Appendix C - Development Sites Assessments Summary Reports (04.02.13) and the accompanying spreadsheet - GM SFRA Level 1 Appendix B Sites Assessment Part 2.xlsx (04.02.12) identify that the site falls within recommendation D of the assessment which recommends that development could be permitted due to low flood risk perceived from the EA flood maps, assuming a site-specific FRA shows the site can be safe and it is demonstrated that the site is sequentially preferable.</p>

Chapter 11 – Site Allocations (Oldham)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Site Allocations (Oldham) and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JPA 12 – Beal Valley

Row	Main Issue	PfE Response
1	There are no exceptional circumstances for Green Belt release. 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 PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas.</p>
2	Insufficient consideration has been given to the allocation of alternative urban sites in advance of releasing land from within the Green Belt. The Plan is unsound as there has been insufficient assessment of reasonable alternatives.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10]. Evidence in relation to the housing land supply can be found in the Housing Topic Paper [06.01.03] and Appendix A: Places for Everyone Housing Land Supply Statement.</p>
3	Disagree with level of housing proposed.	The housing methodology is covered in the Housing Background Paper (06.01.03).
4	Access in and around the site is constrained, opening up new routes will result in more “rat running”. Also, public transport is not suitable in the area, with the Metrolink at capacity at peak times.	The site is considered to be in a sustainable and accessible location 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. Further information can be found in the allocation topic paper [10.05.32] .

		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. Recommendations from the Locality Assessment have informed Policy JPA12 Beal Valley, including criteria 6 and 7.
5	Loss of Green Infrastructure / recreation resource and impact on ecology.	As set out in the Beal Valley Topic Paper [10.05.32] , a Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE. 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.
6	The site is located in a floodplain. Development will cause greater flood risk.	Section B, part 11 of the Beal Valley Topic Paper [10.05.32] summarises the outcomes and recommendations of the SFRA. These findings have been reflected in Policy JPA12 Beal Valley in criterion 19, which requires any development on the site to be informed by an appropriate flood risk assessment and a comprehensive drainage strategy, and criterion 20 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.
7	Comments made regarding the viability and deliverability of the site.	A strategic viability assessment [03.03.01 - 03.03.04] has been published alongside the Publication Plan . Details are summarised in the Beal Valley Allocation Topic Paper [10.05.32] 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.
8	Objections regarding the lack of infrastructure such as schools, medical practices and NHS dentists which would need to be built.	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. Policy JP Allocation 12 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.

PfE 2021 Policy JPA13 – Bottom Field Farm (Woodhouses)

Row	Main Issue	PfE Response
1	Disagree with Green Belt release and loss of green space, it should be brownfield first. No exceptional circumstances have been demonstrated.	<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 [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas. In addition, Bottom Field Farm site allocation includes brownfield land.</p>
2	Not in line with preventing urban sprawl. Development will create a poor and indefensible Green Belt boundary to the south of the village.	The Stage 2 Green Belt Study (07.01.09) states that the site makes a relatively limited contribution to Green Belt Purpose 1 and Purpose 2. The Stage 2 Green Belt Study Addendum (07.01.10) confirms a minor level of impact on adjacent Green Belt as a result of the introduction of a more complex inset boundary and a overall harm rating of moderate. The Stage 2 Assessment (07.01.09) outlines mitigation to address harm.
3	The additional housing exceeds the governments predicted requirements of the area.	The housing methodology is covered in the Housing Background Paper (06.01.03).
4	Properties in Woodhouses would not be affordable or eco homes. This is an opportunity to deliver 100% affordable led development.	Policy JP- H 2 sets out the approach to affordable housing and Policy JP Allocation 13 criterion 2 states development will be required to provide affordable homes in line with local planning policy requirements. There are policies within PfE that support the development of 'eco homes' such as Policy JP-P 1 and Policy JP-S 2.
5	Development will have a negative impact wildlife habitat including surrounding wildlife. No ecological mitigation is provided within the concept plan, which indicates full development of the site area.	A Preliminary Ecological Appraisal (10.05.18) has been carried out for this site to inform PfE. This has fed into Policy JP Allocation 13. The concept plan (10.05.05-10.05.06) is high level and only shows the proposed access and use of land. However, a landscape strategy was prepared to support the concept plan. Policy JP Allocation 13 requires development to incorporate multi-functional Green Infrastructure, high-quality landscaping, retain and enhance biodiversity and Public Rights of Way. Policy JP-G 9 addresses biodiversity net gain.
6	Development encroaches on people's recreational space and enjoyment of semi natural spaces. The Green Belt should be bought back into full production.	The site is occupied by a farm building and consists of brownfield land. Policy JP Allocation 13 requires development to incorporate multi-functional Green Infrastructure, high-quality landscaping, retain and enhance Public Rights of Way, provide new and / or enhanced open space, sport and recreational facilities, and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt.
7	Concerns about access, additional traffic, road safety and rights of way / footpaths / bridleways.	Policies require development to incorporate appropriate mitigation. Details of the suggested access arrangements for the allocation can be found in the Transport Locality Assessment (09.01.11). Policy JP Allocation 13 requires development to

		provide appropriate access and deliver other improvements, including off site highways improvements, walking and cycling infrastructure and public transport facilities; and retain and enhance the Public Rights of Way.
8	Development will cause air pollution and impact on climate change.	PfE contains a number of thematic policies which contribute to addressing climate change 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); and Green Infrastructure (Policies JP-G2, 5, 7, 9). JP Allocation 13 includes criteria 4 (green infrastructure), 6 (biodiversity), 8 (Public Rights of Way), 11 (green belt enhancement) and 16 (flood risk).
9	Development will increase flood risk. UU requested policy wording amendments in relation to surface and foul water and water efficiency.	The site has been assessed as part of the Strategic Flood Risk Assessment (SFRA) (04.02.01 , 04.02.05 , 04.02.11-12). The site is in Flood Zone 1 and passes the flood risk sequential test. JP Allocation 13 criterion 16 requires development to be informed by a flood risk assessment and drainage strategy. Policy JP-S5 provides further detailed policy in relation to Flood Risk and water efficiency.
10	Development would affect the overall character and of the village negatively.	The development is for around 30 homes, on previously developed land. Evidence such as the Historic Environment Assessment (10.05.07) and Landscape Character Assessment (07.01.06) have informed PfE and JP Allocation Policy 13.
11	There is only one primary school in the village. It is difficult to get doctor / dentist appointments. There is a lack of infrastructure.	A number of policies in the Plan provide a sufficient policy framework to address these matters, such as Policies JP-P 5, JP-G6, JP-P1, JP-P6 and JP- D2. Policy JP Allocation 13 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.
12	This will remove the last working farm in Failsworth.	The site was put forward during the call for site exercise as an available site.
13	Alternative site (north of Woodhouses) put forward. Evidence should have considered the as a reasonable alternative. No evidence why Bottom Field Farm is more favourable.	The housing methodology is covered in the Housing Background Paper (July 2021) (06.01.03). The site has been submitted and considered previously as part of the site selection process. Appendix 7 of the Site Selection Paper (03.04.09) explains the reason for not taking the site forward.
14	The site is not viable and therefore may not be delivered. It may not deliver affordable housing and vacant building credit may be used.	The Bottom Field Farm Allocation Topic Paper (10.05.33) 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.

PfE 2021 Policy JPA 14 – Broadbent Moss

Row	Main Issue	PfE Response
1	There are no exceptional circumstances for the release of Green Belt. The allocation contradicts Green belt legislation to keep in check the unrestricted sprawl of large	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

	built-up areas. The site provides those 'green lung' areas which minimise urban sprawl between built up conurbations.	land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04] , the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas.
2	Insufficient consideration has been given to the allocation of alternative urban sites in advance of releasing land from within the Green Belt. The Plan is unsound as there has been insufficient assessment of reasonable alternatives.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs. The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper [02.01.10] . Evidence in relation to the housing land supply can be found in the Housing Topic Paper [06.01.03] and Appendix A: Places for Everyone Housing Land Supply Statement.
3	Disagree with level of housing proposed.	The housing methodology is covered in the Housing Background Paper (06.01.03).
4	Access in and around the site is constrained, opening up new routes will result in more "rat running". Also public transport is not suitable in the area, with the Metrolink at capacity at peak times.	The site is considered to be in a sustainable and accessible location and has the potential for greater connectivity through the proposed new Metrolink stop, which would serve both this site and the Beal Valley site, providing increased access to Rochdale Town Centre, Oldham Town Centre, Manchester City Centre and beyond. Further information can be found in the allocation topic paper [10.05.34] . 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.
5	Loss of Green I infrastructure / recreation resource and impact on ecology.	As set out in the allocation topic paper [10.05.34] , a Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE. 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.
6	The site is located in a floodplain. Development will cause greater flood risk.	A Strategic Flood Risk Assessment (SFRA) [04.02.01] has been carried out for Broadbent Moss which was split into three parcels (15a, 15b and 15c) in the SFRA level 1. A summary of the findings can be found in the Broadbent Moss Topic Paper [10.05.34] . 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 [04.02.20] . These findings have been reflected in

		Policy JPA14 Broadbent Moss in criterion 20. 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.
7	Comments made regarding the viability and deliverability of the site.	A strategic viability assessment [03.03.01 - 03.03.04]has been published alongside the Publication Plan . Details are summarised in the Broadbent Moss Allocation Topic Paper [10.05.34] 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.
8	Objections regarding the lack of infrastructure such as schools, medical practices and NHS dentists which would need to be built.	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. Policy JP Allocation 14 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.

PfE 2021 Policy JPA15 – Chew Brook Vale (Robert Fletchers)

Row	Main Issue	PfE Response
1	Land at Waterside Mills should be included within the allocation to accommodate upper market housing.	The site land at Waterside Mill has been submitted and considered previously as part of the site selection process. See Call for Sites ID 1624523343005. Appendix 7 of the Site Selection Paper (03.04.09) explains the reason for not taking the site forward.
2	The site capacity needs to be increased. Flood risk is based on incomplete data and is unsound.	The site capacity has been informed by the Level 2 SFRA Addendum (10.05.19). 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.
3	The site is unviable, with constraints (such as flood risk and highways), which may limit development capacity and will not deliver planning obligations. The allocation of 90 homes is not sufficient to cover costs. Not clear why site has been taken forward in site selection process. Should not be allocated if it is not viable.	An updated Viability Assessment was carried out for PfE 2021 (03.01.04). The Chew Brook Vale Topic Paper (10.05.35) 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. If dwellings are increased to between 135-150 the site becomes viable. The allocation is under one ownership. There will be costs associated with remediation, which is acknowledged and constraints such as flood risk have been taken into account.
4	Disagree with building on Green Belt land and loss of green space. Brownfield land should be developed first. There are no exceptional circumstances under which land can be released from the Green Belt in line with NPPF.	The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . In addition, Chew Brook Vale site allocation includes brownfield land.
5	The proposals will encroach on recreation and the enjoyment of semi wild places. The green belt land should be brought back into full production.	The site is a private mill complex, although there are footpaths, and these will be incorporated into the masterplan for the site. Policy JP Allocation 15 sets out criteria that development must meet including in relation to walking and cycling, implementing a visitor management plan, green infrastructure, landscaping and enhancement of the Green Belt.
6	Concerned that development will harm the landscape, character, beauty, views and village setting. Intensification of activity on the site, could threaten the countryside characteristics of the Dovestone gateway and cause probable harm to the Peak District National Park setting. The development needs to focus on sustainable access to the tourism and leisure facilities along with	The allocation has been reduced significantly since the 2016 and 2019 draft GMSF plans and is now contained to the mill complex boundary. Policy JP Allocation 15 requires development to be in accordance with a masterplan and Design Code, deliver highways improvements, be informed by a visitor management plan and incorporate green infrastructure and landscaping to minimise visual impact on the wider landscape and have regard to the landscape character assessment. Duty to Cooperate meetings with PDNPA have taken place and the PDNPA are signatories to the Statement of Common Ground on strategic matters.

	visual journey from the development to the National Park.	
7	Concerns that development will have a negative impact on wildlife and habitats.	A Preliminary Ecological Appraisal (10.05.18) has been carried out for this site to inform PfE. A Habitat Regulation Assessment (HRA) has been carried out to appraise the 2020 GMSF and PfE 2021 (02.02.01 – 02.02.02). These have both fed into Policy JP Allocation 15.
8	Development will cause air pollution and impact on climate change.	PfE contains a number of thematic policies all of which contribute to addressing climate change 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); and Green Infrastructure (Policies JP-G2, 5, 7, 9). The plan must be read as a whole. Policy JP Allocation 15 includes criteria that help address climate change including criteria 5 (off site highway improvements), 7 (green infrastructure), 9 to 11 (biodiversity), 12 and 13 (water quality), 15 (green belt enhancement), 20 (environmental design) and 21 (flood risk).
9	Development will increase flood risk. UU requested policy wording amendments in relation to surface and foul water and water efficiency.	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. The results of this can be seen in the Chew Brook Vale Level 2 Strategic Flood Risk Addendum (10.05.19).
10	No affordable housing. More explanation on approach to housing needed.	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
11	There is a lack of infrastructure.	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. Policy JP Allocation 15 also sets out the requirements for the site to ensure that any necessary infrastructure requirements are provided.
12	The additional housing and warehousing exceeds the governments predicted requirements of the area.	The housing methodology is covered in the Housing Background Paper (06.01.03). The approach to Employment Land Needs is set out in 05.01.02 .
13	Process is corrupt and driven by greed and plan will not benefit the community.	The plan aims to meet objectives of NPPF and is positively prepared in line with regulations.

PfE 2021 Policy JPA 16 – Cowlishaw

Row	Main Issue	PfE Response
1	Site does not meet the exceptional circumstances and there is plenty of brownfield land available in Shaw. In particular, the site allocation is not consistent with NPPF because the case for exceptional circumstances lack merit, and in some instances are counter-intuitive and even contradictory.	<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.</p> <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 [03.04.01] 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 [07.01.25].</p>
2	The impact on Shaw and Crompton is disproportionate in relation to infrastructure and services, whilst the site provides a green wedge between the edge of Oldham and Shaw.	<p>Paragraph 11.189 of Policy JPA16 Cowlishaw 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 Publication Plan 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>
3	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.	A Strategic Flood Risk Assessment (SFRA) has been carried out for the allocation. The SFRA mapped the allocation’s flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording as necessary to include measures to deal with flood risk (Publication Plan 2021, pages 298-300).
4	Dangerous access at Cocker Mill Lane and the overall growth of traffic means that the site is unsafe for vehicular traffic and pedestrians.	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 Cowlishaw Topic Paper [10.05.36] (pages 20-35), Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11] and Transport Locality Assessment Addendum – Oldham [09.01.23] .

		The allocation policy includes measures to address appropriate site access points and the delivery of any other highway 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.
5	Loss of GI/ recreation resource and impact on ecology. A full ecological survey is required to identify important habitats.	The Preliminary Ecological 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 along with further evidence set out in the Cowlshaw Topic Paper [10.05.36] . Informed by evidence base JPA16 includes criteria in relation to delivering multi-functional green infrastructure; retaining and enhancing the hierarchy of biodiversity within the site; and providing for new and/or the improvement of existing open space, sport and recreation facilities. See the full allocation policy JP Allocation 16 for further detail.
6	Cowlshaw is unviable and will only become viable if there was a substantial increase in house prices.	Viability of the proposed site allocation has been assessed. Details of the Viability Assessment is contained within the allocation topic paper [10.05.36] . In terms of the site and it's deliverability, it is considered that this is also demonstrated by the submission of and approval of an outline planning application (PA/344179/19) and a subsequent reserved matters approval (RES/346720/21) at the southern end of the allocation and another application (FUL/346529/21) for the northern parcel, accessed via Denbigh Drive.

PfE 2021 Policy JPA 17 – Land south of Coal Pit Lane (Ashton Road)

Row	Main Issue	PfE Response
1	Site does not meet the exceptional circumstances for removal of Green Belt. In particular, site allocation is 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.	<p>The Site Selection Background Paper [03.04.01] 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 considers that the site will 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 [10.05.37] chapter 5, pages 12-14].</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 strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p>
2	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-	<p>The site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE.</p> <p>The allocation boundary has been reduced by 6.52ha along the western boundary as some mitigation to the impact on the Green Belt [see the allocation topic paper 10.05.37, para.14.3 page 39]. Also the allocation policy sets out that development</p>

	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.	of the site is required to "have regard to the findings of the Stage 2 Greater Manchester Green Belt Study [07.01.07, 07.01.08] , including 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.
3	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.	<p>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 (Publication Plan 2021, page 82).</p> <p>A Strategic Flood Risk Assessment (SFRA) has been carried out for the allocation. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy point 17 as necessary to include measures to deal with flood risk (Publication Plan 2021, pages 298-300).</p>
4	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>The allocation policy (points 4 and 5) includes measures to address appropriate site access points and the delivery of any other highway 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.</p> <p>Furthermore, the locality assessments have considered access to the site and identified necessary local highway mitigation measures to address 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 [10.05.37, chapter 10, pages 19-32] and the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11, Appendix G].</p> <p>As such, it is considered that appropriate evidence and policy requirements have been provided to alleviate traffic and access issues with the development of the site.</p>
5	Loss of GI/ recreation resource and impact on ecology. Brownfield sites on former coal mining can create valuable habitat. A full ecological survey is required to identify important habitats.	The allocation policy (points 8, 9 and 10) sets out measures to ensure the retention and enhancement of GI; mitigate the environmental impacts of development; provide opportunities for leisure and recreation; retain and enhance the hierarchy of biodiversity within the site, notably areas of priority habitats; and provide further surveys on amphibians, extended phase 1 habitats, badgers and bats to inform any planning application. See the full policy wording [Publication Plan, pages 298-300] and the allocation topic paper for further detail in regards to green infrastructure [10.05.37, pages 43-44] .

6	<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.</p>	<p>A strategic viability assessment [03.01.04, pages 84-86], 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%) 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, viability is possible.</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.</p>
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PfE 2021 Policy JPA 18 – South of Rosary Road

Row	Main Issue	PfE Response
1	Use of Green Belt over Brownfield land; no exceptional circumstances shown to allow removal of Green Belt.	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]</p> <p>The Site Selection Background Paper [03.04.01] and the Growth and Spatial Options Paper [02.01.10] provides information on the methodology for selecting the strategic allocations/ growth areas.</p>
2	Opening up St Cuthbert's Fold is unacceptable. It will provide a cut through for people. More detail needed on what is meant by 'secondary access' – can the public use it or is it just emergency vehicles. St Cuthberts 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.	<p>The allocation policy 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. The allocation topic paper sets out that the access may also be used by pedestrian and cycle access [10.05.38, chapter 10, page 19, paragraph 10.15]. Further detail on the site's proposed access arrangements is set out within the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11, Appendix H].</p> <p>Whilst it is considered that the wording could be clearer, many issues, such as the restrictions of the proposed secondary access, will be dealt with at planning application stage as necessary.</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). Detail on the site's proposed access arrangements is set out within the Transport Locality Assessments – Introductory Note and Assessment – Oldham [09.01.11, Appendix H].</p>
3	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.	<p>A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform PfE [10.05.31]. 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, 10.05.38]. This has informed the allocation policy (points 6 and 7) which includes a requirement to retain and enhance the hierarchy of biodiversity within the site, notably Bankfield Clough SBI and the area of priority habitat; provide further surveys on extended phase 1 habitats and bats; and sets out than 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.</p>
4	Land south of Rosary Road is inviable.	<p>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</p>

		<p>applicants to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The allocation's viability assessment is set out on pages 87-89 of the report. Details of the allocations viability assessment is summarised within the allocation topic paper [10.05.38, chapter 24 'Viability' , pages 48-51].</p>
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Chapter 11 – Allocations (Rochdale)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Rochdale) and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JPA19 – Bamford / Norden

Row	Main Issue	PfE Response
1	Concerns raised over the inclusion of the playing fields within the boundary of the allocation. We should be resisting the loss of recreational open space / access land which impacts on the health of local young people.	No change is considered necessary. Criterion 2 of the policy requires any proposal to retain and significantly enhance the existing recreational facilities to create a high quality recreational and sports ‘hub’ serving the local area and the borough as a whole. Including this within the allocation enables these improvements to be delivered and set out in a comprehensive masterplan for the site. Criterion 1 of policy JP Allocation 19 requires the provision of a high-quality network of green and blue infrastructure to complement the retained recreational facilities within the site. This will result in publicly accessible green spaces, including children’s play. In addition, criteria 9 and 12 of policy JP Allocation 19 require the creation of good quality links and routes and the retention and enhancement of public rights of way across and around the site.
2	This area is already over-developed and any more development will represent further over-development of the area. Therefore the additional homes are not needed. If new homes are built there is more need for affordable homes.	No change is considered necessary. Bamford/Norden is currently characterised as a relatively low-density suburban area. It is not considered to be over-developed and it is not considered that this allocation would represent over-development of the area. There is a requirement to meet the housing needs of the plan area and there is insufficient land across the nine districts to meet those needs from within the existing supply. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] The development at this allocation will be subject to Rochdale’s affordable housing policy within its Local Plan in terms of the delivery of affordable homes.
3	Exceptional circumstances for the release of green belt land do not exist and development contradicts green belt policy on preventing the unrestricted sprawl of urban areas.	No change is considered necessary. Paragraphs 1.47 and 1.48 of the plan set out the consideration of Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Section 14 of the Bamford/Norden Allocation Topic Paper 10.06.35 sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.
4	Brownfield sites should be developed before greenfield sites (brownfield first approach).	No changes are considered necessary. 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 and greenfield release. However, there is still a requirement to meet the housing needs of the plan area and there is insufficient land across the nine districts to meet those needs from within the existing supply. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant

Row	Main Issue	PfE Response
		development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10] .
5	The impact of the road infrastructure will be too great and concerns that the proposed mitigations, in particular the proposed one way system, will not address this.	No change is considered necessary. Section 10 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with transport matters relating to this site, including access arrangements, proposed mitigations and criterion 10 of the policy requires contributions to deliver these. The purpose of the mitigation is to reduce the impact of the allocation to the base position and therefore should have no adverse impact on traffic. Sections 14 and 15 of the Bamford / Norden allocation Locality Assessment indicates that the proposed 1-way system demonstrates that a solution is possible to accommodate the traffic impacts of the allocation at this junction. A definitive solution will be developed through the Transport Assessment Statement process set out in PfE policy JP-C 7.
6	Concern as to whether existing social infrastructure, especially schools, can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time	No change is considered necessary. Section 23 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with matters relating to education. Criterion 11 of the policy requires the provision contributions to ensure that there are sufficient school places to accommodate the new housing either through an expansion of existing schools or the provision of new school facilities .It is considered that Policy JPA19, together with other policies in this plan and the Rochdale Local Plan provide an appropriate policy framework to ensure development at this allocation will be supported by the necessary infrastructure.
7	The proposals do not sufficiently address climate change concerns – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
8	Objections to the destruction of natural habitats, wildlife and biodiversity.	No change is considered necessary. Section 18 of the Bamford/Norden Allocation Topic Paper 10.06.35 set out matters in respect of ecology and biodiversity. This concludes that whilst further work would be required as part of any planning application, the preliminary survey concludes that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area. Policy JP-G 9 of the plan provides further safeguards in respect of biodiversity including on sites identified for new development.
9	Concerns regarding flooding and drainage.	No change is considered necessary. Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Land north of Bamford/Norden Allocation Topic Paper 10.06.35 deals with issues relating to flood risk and drainage. This concludes that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage.
10	Some modifications to policy proposed.	No change is considered necessary. The policy as written is considered to be sound and justified based on the supporting evidence.

PfE 2021 Policy JPA20 – Castleton Sidings

Row	Main Issue	PfE Response
1	This area is already over-developed with plenty of housing available, there is no need for any more. If new homes are built they should be affordable homes.	No change is considered necessary. As noted in paragraph 25.4 of the Castleton Sidings Allocation Topic Paper 10.06.36 Castleton offers significant opportunity as an area for growth and regeneration, based primarily on the existing and potential accessibility of the area via a range of transport modes and has been identified as a key location for development in both the borough's Growth Plan and Rochdale Corridor Strategy. The development at this allocation will be subject to Rochdale's affordable housing policy within its Local Plan.
2	Houses will need to be well insulated as next to a railway line.	No change is considered necessary. Criterion 11 of JP Allocation 20 requires acoustic attenuation to mitigate the potential visual and noise impact on the railway side of the land.
3	No exceptional circumstances have been demonstrated to justify releasing this land from the Green Belt.	Paragraphs 1.47 and 1.48 of the plan set out the consideration of Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Section 14 of the Castleton Sidings Allocation Topic Paper 10.06.36 sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.
4	Given the previous use of the site remediation will be necessary and more investigations are required to ensure the site is safe for development. Remediation could impact the delivery of the site.	No changes are considered necessary. Section 12 of the Castleton Sidings Allocation Topic Paper 10.06.36 addresses the issue of ground conditions. Paragraph 12.2 notes that that an intrusive investigation would be required to establish if and what remedial techniques are necessary to ensure the site is suitable for its intended end use. This would be a condition relating to any future planning approval and is common in respect of sites which have previous had an industrial use. In terms of deliverability, the viability assessment for this site as set out in the Strategic Viability Assessment Stage 2 Report 03.01.04 includes site preparation costs.
5	The impact of the local road infrastructure will be too great. More detailed concerns regarding access to and from the site.	No change is considered necessary. Section 10 of the Castleton Sidings Allocation Topic Paper 10.06.36 deals with transport matters relating to this site, including proposed mitigations and criterion 10 of the policy requires contributions to deliver these.
6	The development should not conflict with the heritage railway line.	No change is considered necessary As set out in criterion 3 of policy JP Allocation 20 and paragraph 11.221 of the supporting text, the development of the site is important to facilitate the extension of the East Lancashire Railway (ELR) from Heywood to Castleton. Therefore this development will enhance rather than conflict with the heritage railway line.
7	Concern as to whether existing social infrastructure, especially schools and doctors, can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time.	No change is considered necessary. A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P1 and JP- D2 which states that new development must be supported by the necessary infrastructure, including where appropriate, schools and medical facilities. The Plan needs to be read as a whole, therefore no change is considered necessary. Section 23 Castleton Sidings Allocation Topic Paper 10.06.36 deals with education. It notes that plans to deliver a new school within the area are being progressed. Criterion 12 of the policy requires contributions to ensure that there are sufficient school places to accommodate the new housing.

Row	Main Issue	PfE Response
8	The proposals do not sufficiently address climate change concerns – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
9	Objections to the destruction of natural habitats, wildlife and biodiversity.	Section 18 of the Castleton Sidings Allocation Topic Paper 10.06.36 set out matters in respect of ecology and biodiversity. This notes that whilst the preliminary survey concludes that there are no (NB there is a typo in the Topic Paper with 'no' being omitted as can be seen on p.17 of the Preliminary Ecological Appraisals Screening Rochdale 2020 10.06.08) identified ecological constraints that would impose a significant constraint to the allocation, the nearby Rochdale Canal would need special consideration. Criterion 10 of policy JP Allocation 20 requires a project specific Habitats Regulation Assessment for planning applications of 50 dwellings. Criteria 2 and 11 of the policy set requirements for landscaping and green infrastructure that would help to support ecology and biodiversity in the site. Policy JP-G 9 of the plan provides further safeguards in respect of biodiversity including on sites identified for new development.
	Some modifications to policy proposed.	No change is considered necessary. The policy as written is considered to be sound and justified based on the supporting evidence.

PfE 2021 Policy JPA21 – Crimble Mill

Row	Main Issue	PfE Response
1	Questions regarding the viability of the scheme and the need to develop the greenfield portion of the site in order to deliver redevelopment of the Mill.	The viability assessment for this site as set out in the Strategic Viability Assessment Stage 2 Report 03.01.04 includes site preparation costs with input from the site promoter. Section 25 of the Crimble Mill Allocation Topic Paper 10.06.37 summarises the assessment of viability conducted by Three Dragons.
2	The development is unnecessary given lack of local housing need (using up to date ONS figures) and brownfield sites should be utilised first.	The supply of dwellings on brownfield land and vacant buildings has been optimised as set out in the Housing Topic Paper 06.01.03 . However, there is a quantitative and qualitative shortfall in the supply in the plan area which can only be met through the release of 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 02.01.10 and Housing Topic Paper 06.01.03 which includes boosting the competitiveness of the north of the conurbation The methodology and calculation of the Local Housing Need is set out in the Housing Topic Paper 06.01.03 .
3	Exceptional circumstances for the release of green belt land do not exist and development contradicts green belt policy on preventing the unrestricted sprawl of urban areas.	No change is considered necessary. Paragraphs 1.47 and 1.48 of the plan set out the consideration of Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Section 14 of the Crimble Mill Allocation Topic Paper 10.06.37 sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.
4	Development of the site will result in existing local roads becoming congested and parking made difficult for residents and the school.	No change is considered necessary. Section 10 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with transport matters relating to this site, including proposed mitigations and criterion 7 of the policy requires contributions to deliver these. It is considered that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.
5	Concern as to whether existing social infrastructure, especially schools and doctors, can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time	No change is considered necessary. 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. Criterion 11 of the allocations policy requires any proposal to provide some land adjacent to the school to allow for future expansion including associated outdoor playing space. This would assist in providing new school places in a location convenient for the residents of the new development. The policy also includes a requirement to provide contributions to ensure that there are sufficient school places to accommodate the new housing.
6	The proposed development will negatively impact on local residents and children at the nearby school due to noise and air pollution and highway safety.	Policy JP-P 1 of the plan focusses on the delivery of sustainable places. Criterion 15 of this policy requires the creation of places that are comfortable and inviting, with indoor and outdoor environments, offering a high level of amenity that minimises exposure to pollution. Section 22 of the Crimble Mill Allocation Topic Paper 10.06.37 addresses the issue of noise in relation to the development.

Row	Main Issue	PfE Response
		The allocations policy includes a number of criteria relating to the delivery of good quality walking and cycling routes and provision for charging electric vehicles. These, along with the public transport connectivity of the site, will contribute to reducing emissions.
7	Established habitats for wildlife will be destroyed and wildlife will be lost or displaced to the detriment of the local environment.	No change is considered necessary. It is considered that appropriate and proportionate evidence has been provided to justify the allocation and Section 18 of Crimble Mill Allocation Topic Paper 10.06.37 sets out matters in respect of ecology and biodiversity. This concludes that whilst further work would be required as part of any planning application, the preliminary survey concludes that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area.
8	The proposals do not sufficiently take climate change into account – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
9	The allocation is lacking in detail on the mill development and additional development around the mill will likely result in harm to the setting of the designated heritage asset.	Detailed work on the mill development will be based on further masterplanning and informed by the Crimble Mill Historic Environment Assessment (HEA) 2020 as set out in criterion 2 of policy JP Allocation 21. All work in relation to the mill will also be informed by discussions with Heritage England and the Council's Conservation Officer. The HEA also provides recommendations in terms of development around the mill to ensure the significance of the historic built and natural environment can be preserved or enhanced.
10	Objections to building on flood plain. The proposals will increase drainage and flooding problems. SuDs should be fully incorporated into the development and should be utilised and designed in accordance with design standards.	Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with issues relating to flood risk and drainage. It outlines a number of recommendations, which are reflected in the masterplanning work to date, to be incorporated into the development of detailed proposals at the planning application stage and the accompanying Flood Risk Assessment (FRA) and supporting drainage strategy. Further, it details that indicative masterplanning shows that all new residential development south of the Roch can be directed to Flood Zone 1 and early discussions have been carried out with the Environment Agency in respect of onsite flood risk and its mitigation. Criterion 8 of the allocations policy sets out that any proposal needs to take into account the risk of flooding, particularly in respect of those parts of the site that are identified as being within Flood Zone 3.
11	Some modifications to policy proposed.	No change is considered necessary. The policy as written is considered to be sound and justified based on the supporting evidence.

PfE 2021 Policy JPA20 – Land North of Smithy Bridge

Row	Main Issue	PfE Response
1	No exceptional circumstances have been demonstrated to justify releasing this land from the Green Belt.	Paragraphs 1.47 and 1.48 of the plan set out the consideration of Green Belt. Given the lack of sufficient land to meet development needs it concludes that there is a strategic exceptional circumstances case to be made to release Green Belt for development. Section 14 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.
2	The allocation does not provide sufficient affordable housing	No change is considered necessary. The strategic approach to delivering affordable housing is set out in Policy JP-H 2 of the PfE plan. The Council has a policy within its Local Plan which requires the delivery of affordable homes and this policy will continue to apply once PfE is adopted. There is still a requirement for local authorities to provide sufficient housing to meet the needs of the plan area, including affordable housing.
3	There are many available brownfield sites that should be developed first and at an increased density.	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. The supply of dwellings on brownfield land and vacant buildings has been optimised as set out in the Housing Topic Paper (06.01.03) . However, given the overall scale of development required, a limited amount of Green Belt release is necessary. Further details in relation to the exceptional circumstances can be found in the Green Belt Topic Paper 07.01.25 and the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 .
4	Concerns over contamination due to the proximity of the site to the former Akzo Nobel.	No change is considered necessary. Section 12 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 deals with the issues of ground conditions. Paragraph 12.2 of the Topic Papers note the issues of the adjacent site and the approach to dealing with this at planning application stage. Paragraph 12.3 references the Screening Opinion and the additional work on ground conditions is set out in the schedule that supported the application.
5	The loss of the car park will have a detrimental impact on the tourism of this area and the local economy.	No change is considered necessary. Criterion 11 of the policy and paragraph 11.235 of the reasoned justification set out the requirement for a replacement car park to be delivered.
6	The impact on the road infrastructure will be too great, especially the heavy congestion around Hollingworth Lake. There is no evidence of any traffic survey being carried out.	No change is considered necessary. Section 10 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 deals with transport matters relating to this site, including proposed mitigations and criterion 8 of the policy requires contributions to deliver these. It is considered that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.
7	Public transport (rail, tram and bus) in the area is currently inadequate and overcrowded. It will not cope with increased demand from new houses.	No change is considered necessary. The allocation is located within acceptable walking distance of Littleborough and Smithy Bridge Railway Stations. The Land north of Smithy Bridge Allocation Topic Paper 10.06.38 para 10.9 and PfE Policies JP-C3 and C5 propose walking and cycling improvements to enhance these links and aim to improve the integration of services between public transport modes and connections to / from public transport interchanges. PfE Policy JP-C3 proposes to deliver continued improvements to the rail network and services capacity and connectivity to / from all PfE allocations. Policy JP-C7 commits through

Row	Main Issue	PfE Response
		the Transport Assessment / Statement and Travel Plan processes to ensuring proposed PfE allocations are accessible by sustainable modes.
8	Concern as to whether existing social infrastructure, especially schools and doctors, can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time.	No change is considered necessary. 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. Criterion 10 of the allocations policy requires any proposal to facilitate the delivery of a new primary school and associated outdoor playing space at the southern end of the site and contribute to additional primary and secondary places. As noted in paragraph 23.3 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 ,secondary school provision within the borough is being enhanced through a proposed secondary school in Littleborough which is due to open within the next three years.
9	Concerns regarding the loss of accessible greenspace which is currently enjoyed by the public.	No change is considered necessary. The land is in private ownership with current access limited to public footpaths. Criteria 4 and 5 of the policy requires the delivery of a well-designed scheme which incorporates good quality green and blue infrastructure and provides safe and convenient walking and cycling routes. The green infrastructure within the scheme will provide an opportunity to deliver publicly accessible open space including children's play.
10	The proposals do not sufficiently address climate change concerns – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
11	The site is adjacent to the Rochdale Canal which is noted to be a Special Area for Conservation and a Site of Special Scientific Interest.	No change is considered necessary. Paragraph 11.232 of the supporting text to this policy notes that designated National and European sites are located immediately adjacent to the site and in the wider landscape area. Therefore any impact from the new development and any associated traffic generated will need to be taken into account. Criterion 9 of the policy requires a project specific Habitats Regulation Assessment for planning applications of 50 dwellings or more to assess any impact on the Rochdale Canal.
12	Flooding is a significant issue for this area. Areas of Littleborough regularly flood and this development will only make this flooding worse.	Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 deals with issues relating to flood risk and drainage. This concludes that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage.
13	Some modifications to policy proposed.	No change is considered necessary. The policy as written is considered to be sound and justified based on the supporting evidence.

PfE 2021 Policy JPA23 – Newhey Quarry

Row	Main Issue	PfE Response
1	There is no need/demand for such a large quantity of homes in this area and the need can be met elsewhere	No change is considered necessary. The need for the homes is set out in the Growth and Spatial Options Paper [02.01.10] . The supply of existing land to meet this need is set out in the Housing Topic Paper [06.01.03] . That document also details how the land supply has been optimised in terms brownfield land supply. However, there is a quantitative and qualitative shortfall in the supply in the plan area which can only be met through the release of Green Belt, see the Green Topic Paper [07.01.25] .
2	The scale of development is too large and will impact on the existing community	The masterplanning of this site (as detailed in the Newhey Quarry Allocation Topic Paper 10.6.39) and policies elsewhere in the Plan (such as JP-P1) and at the local level will help to ensure that the development will contribute the delivery of sustainable places, integrating the new development into existing communities
3	The allocation does not provide sufficient affordable housing	No change is considered necessary. The development at this allocation will be subject to Rochdale's affordable housing policy within its Local Plan. The Viability assessments carried out for PfE have taken this into account and demonstrate that development would be viable when delivering affordable housing, see documents [03.03.01 through to 03.03.04] .
4	The impact on the Green Belt is too great and therefore the allocation should be removed from the Plan	No change is considered necessary. The Growth and Spatial Options Paper 02.01.10 sets out the approach to accommodating growth within the plan area. The Green Belt Topic Paper [07.01.25] sets out the exceptional circumstances and the Newhey Quarry Allocation Topic Paper 10.6.39 summarises the assessment of Green Belt in relation to this site and provides further justification for including the allocation within the Plan
5	The impact of the road infrastructure will be too great	No change is considered necessary. Section 10 of the Newhey Quarry Allocation Topic Paper 10.6.39 deals with transport matters relating to this site, including proposed mitigations and criterion 10 of the policy requires contributions to deliver these. It is considered that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.
6	Concern as to whether existing social infrastructure can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time	No change is considered necessary. The Newhey Quarry Allocation Topic Paper 10.6.39 details a range of infrastructure issues and how these will be addressed. It is considered that Policy JPA23, together with other policies in this plan and the Rochdale Local Plan provide an appropriate policy framework to ensure development at this allocation will be supported by the necessary infrastructure.
7	Newhey Quarry is an important site for a variety of wildlife (including endangered species), their habitats will be at risk if it is developed. Sufficient evidence has not been provided to justify the site	No change is considered necessary. It is considered that appropriate and proportionate evidence has been provided to justify the allocation. In particular Section 18 of the Newhey Quarry Allocation Topic Paper 10.6.39 sets out matters in respect of ecology and biodiversity. This concludes that whilst further work would be required as part of any planning application, the preliminary survey concludes that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area.
8	The proposals do not sufficiently take climate change into account – proposals will result in increased emissions, congestion and air pollution.	The site was subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators. Additionally policies elsewhere in the Plan, particularly within Chapter 5, provide policy requirements in relation to this matter

PfE 2021 Policy JPA24 – Roch Valley

Row	Main Issue	PfE Response
1	The proposed scale of development is too high. No more houses are needed in this area and the homes proposed do not meet local housing need.	No change is considered necessary. As set out in the conclusion in section 30 of the Roch Valley Allocation Topic Paper 10.06.40 this site seeks to deliver a high quality scheme that will contribute to the choice and quality of housing in this sustainable location. The capacity of the site is based on achieving a balance between delivering a range of house types and making efficient use of the site taking account of its proximity to public transport. The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper 02.01.10 and Housing Topic Paper 06.01.03 which includes boosting the competitiveness of the north of the conurbation
2	There are many available brownfield sites, for example the vacated Wheatsheaf shopping centre that should be developed first.	No change is considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land and limit the extent of Green Belt and greenfield release. However, there is still a requirement to meet the housing needs of the plan area and there is insufficient land across the nine districts to meet those needs from within the existing supply. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10]. No changes are considered necessary.
3	The impact on the road infrastructure will be too great, especially the heavy congestion around Hollingworth Lake	No change is considered necessary. Section 10 of the Roch Valley Allocation Topic Paper 10.06.40 deals with transport matters relating to this site, including proposed mitigations. Criterion 8 of the policy requires contributions to deliver these and criterion 9 requires that the scheme be designed in a way to deliver the eastern section of a proposed residential relief road between Smithy Bridge Road and Albert Royds Street. It is considered that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.
4	Public transport (rail, tram and bus) in the area is currently inadequate and overcrowded. It will not cope with increased demand from new houses.	No change is considered necessary. As noted in paragraph 10.9 of the Roch Valley Allocation Topic Paper 10.06.40 there is good access to the bus stops on A58 with services to Rochdale Bus Station, which interchanges with Metrolink, and Littleborough where stops are within a short walking distance of the railway station. . PfE Policy JP-C3 proposes better integration of services and between public transport modes and connections to / from public transport interchanges. PfE Policy JP-C3 proposes to deliver continued improvements to the rail network and services capacity and connectivity to / from all PfE allocations. Policy JP-C7 commits through the Transport Assessment / Statement and Travel Plan processes to ensuring proposed PfE allocations are accessible by sustainable modes.
5	Concern as to whether existing social infrastructure, especially schools and doctors, can accommodate the scale of development	No change is considered necessary. 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. In relation to this specific sites, the Roch Valley Allocation Topic Paper 10.06.40 covers a wide range of issues relating to infrastructure. Section D of the Topic Paper deals with social infrastructure.

Row	Main Issue	PfE Response
	proposed and/or whether new infrastructure can be delivered at the right time.	As noted in paragraph 23.3 of the Roch Valley Allocation Topic Paper 10.06.40 secondary school provision within the borough is being enhanced through a proposed secondary school in Littleborough which is due to open within the next three years.
6	Concerns regarding the loss of green spaces which are an important part of the area and are used for walking, cycling and other recreation activities that benefit people's health and wellbeing	No change is considered necessary. Sections 15 and 16 of the Section 21 of the Roch Valley Allocation Topic Paper 10.06.40 sets out opportunities in relation green infrastructure and recreation within the scheme. This would be part of the high quality green and blue infrastructure requirements set out in criterion 4 of the allocations policy. Criterion 6 of the policy requires the maintenance and enhancement of pedestrian and cycle routes through the valley both to promote active lifestyles and provide sustainable routes to local centres, services and public transport.
7	The proposals do not sufficiently address climate change concerns – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
8	The development will have a detrimental impact on the wildlife and decrease the levels of biodiversity.	No change is considered necessary. Section 18 of the Newhey Quarry Allocation Topic Paper 10.6.39 set out matters in respect of ecology and biodiversity. This concludes that whilst further work would be required as part of any planning application, the preliminary survey concludes that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area however a HRA may be needed. Criterion 4 of the policy sets out requirements in respect of green and blue infrastructure which would enhance biodiversity opportunities on the site. In addition, policy JP-G 9 of the plan provides further safeguards in respect of biodiversity including on sites identified for new development.
9	The site is on a flood plain, development will result in increased flooding.	No change is considered necessary. Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Roch Valley Allocation Topic Paper 10.06.40 deals with issues relating to flood risk and drainage. The conclusion from this and the SFRA which evidences this has resulted in the inclusion of a policy requirement (criterion 3) to safeguard the land between the developed part of the site and the River Roch to contribute to measures that deliver flood alleviation benefits for the River Roch catchment between Littleborough and Rochdale town centre. A planning application has been submitted on this site and there is engagement between the applicant and the Environment Agency in relation to flood risk and drainage.
10	Some modifications to policy proposed.	No change is considered necessary. The policy as written is considered to be sound and justified based on the supporting evidence.

PfE 2021 Policy JPA25 – Trows Farm

Row	Main Issue	PfE Response
1	The plans represent over-development of the area, which is being swamped with planning applications for housing and other developments.	<p>No change is considered necessary. Paragraph 11.245 of the reasoned justification for this policy notes the other housing opportunities in this area. It adds that this site complements these by widening housing choice and helping to regenerate the wider area.</p> <p>Paragraph 25.4 of the Trows Farm Allocation Topic Paper 10.06.41 notes that Castleton has been identified as a key location for development in both the borough's Growth Plan and Rochdale Corridor Strategy. This reflects the high level of connectivity that Castleton benefits from as set out in the policy and supporting Trows Farm Allocation Topic Paper.</p>
2	Concerns regarding viability and deliverability of site and the allocation does not deliver sufficient affordable housing.	<p>No change is considered necessary. Section 25 Trows Farm Allocation Topic Paper 10.06.41 sets out the issues in relation to viability. This concludes that an assumed uplift in values based on wider regeneration will mean the site can be delivered. The site is being promoted by a housing developer.</p> <p>Criterion 1 of the allocation policy states the requirement to deliver a mix of house types on the site. The ambition for the site has always been to maximise the potential for the delivery of affordable housing in line with local affordable housing policy requirements and any subsequent planning application will be considered against the policy in the Local Plan. However, as detailed in the Strategic Viability Assessment Stage 2 Report 03.01.04, it has been necessary to reduce the contribution to 2.5% GDV (compared with the current policy requirement of 7.5%), to ensure that the site remains deliverable at this time. Policy JP-H 2 notes that affordable housing will be delivered via a number of mechanisms, therefore the overall ambitions in relation to affordable housing are considered deliverable.</p>
3	Local housing need can be met without the release of greenfield land and should focus on brownfield sites.	<p>No change is considered necessary. 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 and greenfield release. However, there is still a requirement to meet the housing needs of the plan area and there is insufficient land across the nine districts to meet those needs from within the existing supply. Chapter 4 (4.1 - 4.23) summarises the PfE Spatial Strategy which seeks to deliver significant development in the core growth area, boost the competitiveness of the Northern Areas and sustain the competitiveness of the Southern Areas. The approach to growth and spatial distribution is set out in the Growth and Spatial Options Paper [02.01.10].</p>
4	Concerns regarding lack of employment opportunities in the local area. Especially high-quality employment opportunities needed to support the proposals to build high-value homes.	<p>No change is considered necessary. The Strategy set out within the plan seeks to boost the competitiveness of the north of the conurbation, including Rochdale. Paragraph 4.48 of the PfE plan identifies the importance of delivering housing to attract higher income households and high skilled workers, particularly in northern areas. This will assist in business creation and support local economic activity. The end of this paragraph, notes that other sites, as well as those specifically listed, have the potential to attract skilled workers and hence boost the competitiveness of the north.</p>
5	The impact on the road infrastructure will be too great.	<p>No change is considered necessary. Section 10 of the Trows Farm Allocation Topic Paper 10.06.41 deals with transport matters relating to this site, including proposed mitigations and criterion 10 of the policy requires contributions to deliver these. It is considered</p>

Row	Main Issue	PfE Response
		that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.
6	Concern as to whether existing social infrastructure, especially schools, can accommodate the scale of development proposed and/or whether new infrastructure can be delivered at the right time	No change is considered necessary. The Trows Farm Allocation Topic Paper 10.06.41 details a range of infrastructure issues and how these will be addressed. Criterion 12 of Policy JPA25 requires the provision of contributions to ensure that there are sufficient school places to accommodate the new housing either through an expansion of existing schools or the provision of new school facilities. It is considered that Policy JPA25, together with other policies in this plan and the Rochdale Local Plan provide an appropriate policy framework to ensure development at this allocation will be supported by the necessary infrastructure.
7	Objection to the loss of accessible green space, protected open land and leisure space.	No change is considered necessary. Criterion 6 requires the delivery of a well-designed scheme which incorporates good quality green and blue infrastructure having regard to existing biodiversity and greenspace corridors. The land is in private ownership with current access limited to public footpaths. As noted in Paragraph 15.4 of the Trows Farm Allocation Topic Paper 10.06.41 there are two Public Rights of Way, both of these are to be retained and utilised to provide linkages from the site to the surrounding local area. The green infrastructure in the scheme will deliver publicly accessible open space including children's play.
8	The proposals do not sufficiently address climate change concerns – proposals will result in increased emissions, congestion and air pollution.	No change is considered necessary. The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The plan has been subject to Strategic Environmental Assessment (SEA), including the Integrated Assessment (IA). Section 1.5.2 of the IA Scoping Report 02.01.01 states that the assessment has taken account of the fact that all the districts have declared a climate emergency.
9	Objections to the destruction of natural habitats, wildlife and biodiversity – the site is adjacent site of biological importance.	No change is considered necessary. Section 18 of the Trows Farm Allocation Topic Paper 10.06.41 deals with ecology and biodiversity. It states that whilst further work would be required as part of any planning application, the preliminary survey concludes that there are no identified ecological constraints that would impose a significant constraint to the allocation of the area. Criterion 7 of the policy requires a project specific Habitats Regulation Assessment for planning applications of 50 dwellings or more to assess any impact on the Rochdale Canal -a designated National and European site in close proximity to this allocation. Policy JP-G 9 of the plan provides further safeguards in respect of biodiversity and Local Plan policies also deal with development that may affect Sites of Biological Importance.
10	Concerns regarding increased surface water exacerbating existing drainage and flooding issues in the local area.	Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Trows Farm Allocation Topic Paper 10.06.41 deals with issues relating to flood risk and drainage. This concludes that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage.

Chapter 11 – Allocations (Salford)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Salford) and the relevant PfE response is set out below.

PfE 2021 Policy JPA26 – Hazelhurst Farm

Row	Main Issue	PfE Response
1.	Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, and comments relating to urban sprawl. Inconsistencies were identified with NPPF paragraphs 137, 140, 141, 145, 147 and 149. More general comments were received in relation to the loss of greenspace.	<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 [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>The Growth and Spatial Options Topic Paper [02.01.10] sets out the approach to accommodating growth within the plan area which requires the release of some Green Belt. Chapter 14 of the Hazelhurst topic paper [10.07.68] sets out the assessment of Green Belt for this site, and the exceptional circumstances that justify its release (paragraphs 14.2 to 14.5). With regards to the issues raised regarding urban sprawl, paragraphs 14.7 – 14.11 of the topic paper [10.07.68] considers the site’s Green Belt purposes (by way of reference to assessments carried out by LUC). For reasons set out in the main Hazelhurst Farm issues</p>

Row	Main Issue	PfE Response
		<p>report (row JPA26.49), the allocation is consistent with those paragraphs of the NPPF that are applicable to the PfE allocation; compliance with paragraph 141 has been demonstrated through the Green Belt topic paper [07.01.25], paragraphs 6.56 to 6.73].</p> <p>Given the above, no modifications are necessary to make the site allocation sound.</p>
2.	Concerns relating to loss of agricultural land.	<p>An agricultural land appraisal [10.07.04] identifies that most of the site is grade 3b or below, and that around 4.5 hectares of the land in the southern part of the site as being grade 3a (good quality). Taking into account overall housing needs (qualitative and quantitative) a limited amount of development on high grade agricultural land is considered necessary.</p> <p>Given the above, no modifications are necessary to make the site allocation sound.</p>
3.	Focus should instead be on available brownfield sites; these sites mean that the release of Green Belt is not necessary.	<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 [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]. The supply of dwellings on brownfield land and vacant buildings has been maximised as set out in the Housing Topic Paper [06.01.03].</p> <p>Given the above, no modifications are necessary to make the site allocation sound.</p>

Row	Main Issue	PfE Response
4.	Lack of suitable access points into the site, particularly given proximity of the A580 / M60 and the narrow width of Hazelhurst Road. Alongside this, there would be a significant number of cars which would exacerbate significant issues of congestion.	The transport locality assessment [09.01.13] (pages 40-41) notes that there are a number of potential access points to/from the allocation that are suitable subject to further details being considered at the masterplanning /planning application stage. The transport locality assessments [09.01.13] and [09.01.25] look at the individual and cumulative impacts of development and conclude that this allocation is deliverable with the traffic impacts being less than severe (which is the test in the NPPF). Whilst the modelling forecasts that some junctions may experience capacity issues, they are not significantly worse than without the allocation. Given the above, no modifications are necessary to make the site allocation sound.
5.	Inadequate public transport links, including issues of overcrowding (particularly on the Vantage services) and reduced bus services to the area identified.	Paragraph 10.1 of the Hazelhurst allocation Topic Paper [10.07.68] notes that the site allocation has good access to public transport and has been identified as being appropriate for development due to its location next to the Leigh Salford Manchester (LSM) Busway. Section 6 of the transport locality assessment [09.01.13] identifies the multi-modal accessibility of the site. Given the above, no modifications are necessary to make the site allocation sound.
6.	Concerns relating to school provision in the area (places and quality), and social infrastructure more generally.	A number of policies in PfE 2021 provide a sufficient policy framework to address issues around community infrastructure, such as policies JP-P 6 (Health, criterion 1) and JP-D2 (developer contributions). Objective 9 of PfE relates to ensuring access to physical and social infrastructure. The city council has a statutory duty to provide pupil places to meet demand within the local area to which pupils live. Given the above, no modifications are necessary to make the site allocation sound.

Row	Main Issue	PfE Response
7.	Negative impact / loss of wildlife and habitats including protected species and woodland, representations included reference to impact on Worsley Woods.	It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken and appropriate detailed ecological surveys being submitted at the planning application stage [10.07.68 , chapter 18]. Specific issues that need to be addressed have been identified in the site allocation policy through criteria 8, 9 and 10. In particular criterion 10 requires development to avoid harm to protected species. Given the above, no modifications are necessary to make the site allocation sound.
8.	Development will lead to exacerbation of existing issues of poor air quality including through traffic and loss of green infrastructure.	Policy JP-S 6 of PfE identifies a comprehensive range of measures that will be taken to support improvements in air quality. Chapter 21 of the Hazelhurst Farm site allocation Topic Paper [10.07.68] provides commentary with regards to the issue of air quality.
9	The landowner Peel L&P supports the allocation and considers that, on the basis of technical analysis, there are no constraints to developing the site. However, they consider that some modifications to the site allocation policy are required in order to make the policy sound.	The modifications sought by the majority landowner relate to: <ul style="list-style-type: none"> • The first sentence of the site allocation policy, to identify that the site can be developed for 450 dwellings rather than 400 dwellings as proposed in the site allocation policy • The site allocation boundary, to include land on its northern edge adjacent to the A580. • Criteria: 1 (masterplan requirement) 2 (affordable housing requirement) and 14 (requirement for allotments).

Row	Main Issue	PfE Response
		The full summary of the main issues raised to this allocation includes a response to the suggested modifications. However, no modifications are proposed or considered necessary in response to these comments to make the site allocation sound.

PfE 2021 Policy JPA27 - East of Boothstown

Row	Main Issue	PfE Response
1.	<p>Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, and comments relating to urban sprawl. Inconsistencies were identified with NPPF paragraphs 137, 140, 141, 145, 147 and 149. More general comments were received in relation to the loss of greenspace.</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 housing land needs and supply can be found in the Housing Topic Paper [06.01.03]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25].</p> <p>The Growth and Spatial Options Topic Paper [02.01.10] sets out the approach to accommodating growth within the plan area which requires the release of some Green Belt. Chapter 14 of the East of Boothstown topic paper [10.07.68] sets out the assessment of Green Belt for this site, and the exceptional circumstances that justify its release (paragraphs 14.2 to 14.5). With regards to the issues raised regarding urban sprawl, paragraphs 14.7 – 14.11 of the topic paper considers the site’s Green Belt purposes (by way of reference to assessments carried out by LUC). For reasons set out in the main East of Boothstown issues report (row JPA27.55), the allocation is consistent with those paragraphs of the NPPF that are applicable to the PfE allocation; compliance with paragraph 141 has been demonstrated through the Green Belt topic paper [07.01.25], paragraphs 6.56 to 6.73]. Given the above, no modifications are necessary to make the site allocation sound.</p>

Row	Main Issue	PfE Response
2.	Focus should instead be on available brownfield sites; these sites mean that the release of Green Belt is not necessary.	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 [02.01.10] The supply of dwellings on brownfield land and vacant buildings has been maximised [06.01.03] . Given the above, no modifications are necessary to make the site allocation sound.
3.	Inadequate public transport links, issues including overcrowding (particularly on the Vantage Service), speed, frequency and reduced bus services to the area identified. The area is not well served by public transport.	Chapter 10 of the East of Boothstown allocation Topic Paper [10.07.69] summarises the transport locality assessment that has been prepared as part of the evidence base for the allocation [09.01.13] and [09.01.25] . The assessment identifies some walking and cycling improvements which would improve the site's accessibility; these requirements have been incorporated into the allocation policy wording. Boothstown is served by a range of public transport services, with bus stops provided along the A572 Leigh Road, with the more frequent V1/V2 bus services running along the A580 East Lancashire Road to the north 1km from the site. Additional buses on the Leigh Salford Manchester busway are being considered through Our Five Year Transport Delivery Plan [09.01.02] . The performance of the Vantage service is monitored closely by TfGM. Given the above, no modifications are necessary to make the site allocation sound.

Row	Main Issue	PfE Response
4.	<p>Development will Exacerbate significant existing issues of congestion on nearby local and strategic roads (M60 Junction 13) including the cumulative impact of the Royal Horticultural Society Garden Bridgewater and other PfE allocations in the wider area. Access from Occupation Road will add further strain to Leigh Road. Lack of a transport of evidence base.</p>	<p>National Highways (formerly Highways England) is addressing capacity issues on the Strategic Road Network as part of the North West Quadrant Study. Chapter 10 of the East of Boothstown allocation Topic Paper [10.07.69] summarises the transport locality assessment for the allocation [09.01.13] and [09.01.25]. The locality assessment has considered the impacts of the site allocation in isolation and in the context with other nearby sites such as the Hazelhurst Farm, and the North of Mosley Common allocations in Wigan, and concludes the site is deliverable. With regards to RHS Bridgewater, the majority of the traffic impacts are off-peak given its opening hours; any planning application for the allocation would need be accompanied by further detailed transport work. Given the above, no modifications are necessary to make the site allocation sound.</p>
5.	<p>Concerns relating to school provision in the area (places and quality), and social infrastructure more generally.</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. The Plan needs to be read as a whole, therefore no change is considered necessary. The city council also has a statutory duty to provide pupil places to meet demand within the local area to which pupils live. Given the above, no modifications are necessary to make the site allocation sound.</p>

Row	Main Issue	PfE Response
6.	Negative impact/ loss of wildlife and habitats including protected species, with conflict identified with paragraph 120b of the NPPF. Development could have a serious effect on Alder Wood.	There are records of protected species on this site [10.07.69 , paragraph 18.3], and appropriate detailed ecological surveys would be required to accompany any planning application. Criterion 9 requires of the site allocation policy requires that development avoids harm to protected species. Other criteria within the site allocation policy mitigate the impact on the potential functions of undeveloped land (including criteria 6, 7, 8, 10, 11, 12, 13 and 14). The site allocation policy requires that Alder Wood is retained (criterion 3). In addition, development will be required to deliver a minimum 10% net gain in biodiversity. Given the above, no modifications are necessary to make the site allocation sound.
7.	Development will lead to exacerbation of existing issues of poor air quality including through traffic and loss of green infrastructure.	Policy JP-S 6 of PfE identifies a comprehensive range of measures that will be taken to support improvements in air quality. Chapter 21 of the East of Boothstown site allocation Topic Paper [10.07.69] provides commentary with regards to the issue of air quality. Given the above, no modifications are necessary to make the site allocation sound.
8.	Concerns in relation to recent flooding in the area and adequacy of sewers.	Criterion 6 of the site allocation policy requires a detailed drainage and flood risk management strategy is provided in order to ensure that flood risk is adequately addressed, and that development does not increase flood risk elsewhere. Criterion 7 requires sustainable drainage systems to accommodate sufficient space for any necessary flood storage. Given the above, no modifications are necessary to make the site allocation sound.
9.	Concerns regarding the impact on the setting of heritage	The proposed allocation would not have a detrimental impact upon the setting and significance of the assets [10.07.21 , pages 81-91].

Row	Main Issue	PfE Response
	assets including the RHS Bridgewater	
10.	The majority landowner Peel L&P supports the allocation and considers that, on the basis of technical analysis, there are no constraints to developing the site. However, they consider that some modifications to the site allocation policy are required in order to make the policy sound.	The modifications sought by the majority landowner relate to criterion: 1 (masterplan requirement); 2 (affordable housing requirement); 10 (requirement for a footpath link to the south side of Leigh Road); and 14 (requirement for allotments). The full summary of the main issues raised to this allocation includes a response to the suggested modifications to the relevant site allocation policy criteria, However, no modifications proposed or considered necessary to make the site allocation sound.

PfE 2021 Policy JPA28 – North of Irlam Station

Row	Main Issue	PfE Response
1.	Loss of Green Belt with issues identified including a lack of exceptional circumstances to justify changing its current boundary, and development leading to urban sprawl .	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 [06.01.03] . Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25] . The Growth and Spatial Options Topic Paper [02.01.10] sets out the approach to accommodating growth within the plan area which requires the release of some Green Belt. Chapter 14 of the North of Irlam Station topic paper [10.07.70] sets out the assessment of Green Belt for this site, and the exceptional circumstances that justify its release (paragraphs 14.2 to 14.5). The allocation topic paper also considers the issues of sprawl and the other purposes of Green Belt by way of reference to assessments carried out by LUC. The case for exceptional circumstances is fully explained in the Green Belt topic paper [07.01.25] . Given the above, no modifications are necessary to make the site allocation sound.
2.	Objection was raised to building on grade 1 agricultural land, and peat given it performs as a carbon sink (and so therefore	PfE aims to deliver a carbon neutral Greater Manchester no later than 2038 and be net zero carbon from 2028. A number of the thematic policies within it will contribute to addressing climate change, including JP-S 1, JP-S 3, JP-S 4, JP-S 6, JP-S 7, and policies JP-G2, 5, 7,

Row	Main Issue	PfE Response
	<p>there are climate change implications with the allocation). It was further noted that it may be very difficult to build on the peat as a result of land instability, and that this this will have an impact on the viability of developing the site and therefore delivery of 25% affordable housing.</p>	<p>9. The site allocation policy further includes site specific mitigation measures in relation to carbon (criteria 1 and 5).</p> <p>The Site Selection Background Paper 04.03.01 explains the site selection process undertaken to determine the allocations in PfE. This is summarised in Chapter 5 of the North of Irlam Station topic paper [10.07.70]. Paragraph 4.7 of the North of Irlam Station allocation Topic Paper [10.07.70] identifies that the allocation balances positive and harmful impacts. The benefits include providing family and affordable homes in a location close to high quality public transport via Irlam Station; the harmful impacts in particular relate to the loss of peat in terms of biodiversity and its role storing carbon, and the loss of Grade 1 agricultural land.</p> <p>A viability assessment has been undertaken for the site by Three Dragons which has concluded that the site is viable for 25% affordable housing [03.01.04]. This takes into account the costs of ground conditions identified in a separate report [10.07.48]. See Chapter 25 of the North of Irlam Station topic paper for a summary of the viability position [10.07.70]. Given the above, no modifications are necessary to make the site allocation sound.</p>
3.	<p>Focus should instead be on available brownfield sites and vacant buildings; these sites</p>	<p>The PfE Plan sets out a very clear preference of using brownfield land (paragraphs 1.41 – 1.46 and policy JP-S 1). The supply of dwellings on brownfield land and vacant buildings has been maximised as set out in the Housing Topic Paper [06.01.03]. However, there is a quantitative and qualitative shortfall in the supply in the plan area which can only be met</p>

Row	Main Issue	PfE Response
	mean that the release of Green Belt is not necessary.	through the release of Green Belt. Given the above, no modifications are necessary to make the site allocation sound.
4.	Transport issues including congestion and site access. It was noted by many that part of the rationale for the allocation appears to be its proximity to Irlam Train Station; however it was remarked that there is lack of car parking at the station, services are already poor / overcrowded, and the station is not accessible to all.	Chapter 10 of the North of Irlam Station allocation Topic Paper [10.07.70] deals with transport matters relating to this site . Section 6 of the transport locality assessment [09.01.13] has identified some localised issues in terms of roads, although concludes these can be overcome through mitigation measures, careful masterplanning and further, more detailed assessment. It also identifies the multi-modal accessibility of the site, including current and proposed public transport and walking and cycling options, whilst there are plans to improve the capacity and frequency on the Manchester – Liverpool (via Warrington) line. The Transport Strategy 2040 Delivery Plan [09.01.02] also indicates that TFGM will work with the rail industry to deliver a continued programme of rail station accessibility and customer facilities improvement. Given the above, no modifications are necessary to make the site allocation sound.
5.	A large number of representations stated that biodiversity of the moss will be seriously impacted by development, with adverse impacts on priority species and habitats of importance at the national, GM and local level.	Chapter 18 of the North of Irlam Station allocation Topic Paper [10.07.70] summarises ecology / biodiversity issues and the evidence base relating to the site. An Ecological Appraisal has been prepared by GMEU which covers the PfE 2021 allocation and other land that was proposed through the Draft GMSF in 2016 [10.07.45] . Recommendations from this assessment have been incorporated into the allocation policy requirements. The allocation policy also identifies that development of the site will be required to avoid harm to protected species (criterion 11), whilst criterion 12 specifically relates to birds. Detailed ecological

Row	Main Issue	PfE Response
		surveys would be required to accompany any planning application. Given the above, no modifications are necessary to make the site allocation sound.
6.	<p>At the 2016 Draft GMSF stage land off Springfield Lane / School Lane, and also land at Moss Brow Farm was within the allocation boundary. Following this stage land off Springfield Lane / School Lane was removed from the allocation; land at Moss Brow Farm remained allocated in the 2019 Draft GMSF but was removed from the allocation in PfE 2021. The site promoters / landowners have objected to this and identified their land is deliverable and will help meet the need for larger family sized, and affordable homes.</p>	<p>Land at Springfield Lane has been excluded from the site allocation on the basis that it is around 2km from Irlam Station and so is clearly not as accessible as the site that has been allocated. Land at Moss Brown Farm is not allocated in PfE 2021 as a result of issues relating to the withdrawal of Stockport from the joint plan, its proximity to the train station, the need to comply with Green Belt policy in defining boundaries, and estimated depths of peat across the site. Given the above, no modifications are necessary to make the site allocation sound.</p>

PfE 2021 Policy JPA29 – Port Salford Extension

Row	Main Issue	PfE Response
1.	<p>Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances and settlements merging. General concern with the loss of greenspace.</p>	<p>The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04]. Further details in relation to the strategic case for releasing Green Belt can be found in the Green Belt Topic Paper [07.01.25]. The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt (see chapter 14 of the Port Salford Extension topic paper [10.07.71]). Tri-modal facilities at Port Salford will support a more sustainable logistics sector and enabling its expansion will help to significantly boost the competitiveness of Greater Manchester. The release of this allocation would cause ‘moderate’ harm to Green Belt purposes and ‘no/negligible’ harm to adjacent Green Belt. Further details are set out in chapter 14 of the Port Salford Extension topic paper [10.07.71].</p> <p>A number of criteria in the site allocation policy seek to mitigate the impact on recreation, particularly criterion 11 which requires that full compensation for the loss of the golf course is provided, and criterion 12 which requires high levels of landscaping and the achievement of a</p>

Row	Main Issue	PfE Response
		<p>minimum 10% net gain in biodiversity. Given the above, no modifications are necessary to make the site allocation sound.</p>
2.	<p>Development will exacerbate significant existing issues of congestion on nearby local road network (with reference made to there being only one road through the area) and strategic roads (M60)</p>	<p>Issues of congestion on the highway network in proximity to the site are recognised and interventions are being investigated at a strategic level by National Highways through their North West Quadrant Study. The need for intervention is similarly recognised in the Greater Manchester Transport Strategy 2040 [09.01.01] , with the associated five year delivery plan 2021-26 [09.01.02], page 120] identifying that in the next five years options will be developed for multi-modal interventions to tackle congestion on the M60 North West Quadrant.</p> <p>A transport locality assessment has been prepared for the Port Salford Extension allocation [09.01.13 and 09.01.25]. There is sufficient confidence through the locality assessment undertaken that the allocation can be delivered without unacceptable highway impacts. Further work is needed to confirm the details of the required infrastructure package, but supporting evidence indicates that impacts can be adequately mitigated. Work in this area is continuing in discussion with National Highways. Given the above, no modifications are necessary to make the site allocation sound.</p>
3.	<p>Object to loss of agricultural land.</p>	<p>Agricultural land data suggests that majority of the site comprises grade 1 agricultural land. The majority landowner considers that the site does not comprise best and most versatile agricultural land, based on its understanding of the site and its experience of farming it. On balance, the unique economic opportunity provided by the location is considered to outweigh</p>

Row	Main Issue	PfE Response
		the loss of the land's farming potential. Given the above, no modifications are necessary to make the site allocation sound.
4.	Negative impact/ loss of wildlife and habitats including protected species.	An ecological appraisal has been undertaken for the site by the Greater Manchester Ecology Unit on behalf of the city council [10.07.51] . This appraisal has been used to inform the allocation policy criteria in order to mitigate the impacts development. Criterion 13 of the site allocation policy specifically identifies that harm to protected species should be avoided. Detailed ecological surveys would be required to accompany any planning application. Given the above, no modifications are necessary to make the site allocation sound.
5.	Concerns relating to loss the mosslands, and the carbon storage function of peat and implications of developing it for climate change	The site is considered to be a unique opportunity to distinguish Greater Manchester from its competitors and also to encourage the sustainable movement of freight. Criterion 18 of the allocation policy requires that development "Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of surrounding areas of peat/mossland, whilst ensuring that there is no potential for future problems of land stability or subsidence." Given the above, no modifications are necessary to make the site allocation sound.
6.	Development will lead to exacerbation of existing issues of poor air quality including through traffic, loss of green infrastructure and development of peat land.	Policy JP-S 6 of PfE identifies a comprehensive range of measures that will be taken to support improvements in air quality. Chapter 21 of the Port Salford Extension site allocation Topic Paper [10.07.69] provides commentary with regards to the issue of air quality. Given the above, no modifications are necessary to make the site allocation sound.

Row	Main Issue	PfE Response
7.	Oppose the development on grounds of loss of residential amenity.	Criterion 20 of the allocation policy requires development to: “Protect the amenity of remaining residential properties within or on the edge of the allocation, including through the provision of appropriate landscaped buffers”. Given the above, no modifications are necessary to make the site allocation sound.
8.	The majority landowner Peel L&P supports the allocation and considers that, on the basis of technical analysis, there are no constraints to developing the site. However, they consider that some modifications to the site allocation policy are required in order to make it sound.	<p>The modifications sought by the majority landowner relate to:</p> <ul style="list-style-type: none"> • The site allocation boundary to include land to the west of the allocation and east of Irlam and a small area to the south where the corner of proposed logistics units and highway infrastructure is proposed. • The first sentence of the policy, to increase the amount of employment floorspace to be accommodated within the site to 355,000sqm and 3,000sqm of ancillary floorspace. • The following criteria: 1 (masterplan requirement) and 3 (requirement that the development is not commenced until the identified infrastructure associated with the permitted Port Salford scheme have been completed and are operational). <p>The full summary of the main issues raised to this allocation includes a response to the suggested modifications to the relevant site allocation policy and boundary, However, no modifications are proposed or considered necessary to make the site allocation sound.</p>

Chapter 11 – Allocations (Tameside)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Tameside) and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JPA30 Ashton Moss West

Row	Main Issue	PfE Response
1	Allocation of the site should not contradict Greater Manchester Green Belt policy and Brownfield land should be prioritised.	No change is considered necessary. The plan needs to be read as a whole and PfE sets out a clear preference of using previously developed (brownfield) land and vacant. However, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] sets out the strategic and local case for exceptional circumstances which are considered to exist. In addition, the Council maintains an up to date Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register to support the identification of such opportunities.
2	Transport concerns regarding congestion around the M60, M67 and local towns of Ashton and Droylsden.	No change is considered necessary. It is considered that a proportionate evidence base has been provided to support the policy. A Transport Locality Assessment [09.01.14] and addendum [09.01.26] have been undertaken. Policy point 8 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that adverse effects can be appropriately ameliorated with final mitigation determined by Transport Assessment at the application stage as required by Policy JP-C7.
3	Site is of ecological value and has habitat and protected species which are important alongside having a recreational value.	No change is considered necessary. It is considered that a proportionate evidence base has been provided to support the policy. A plan-wide Habitat Regulation Assessment [02.02.01] and Preliminary Ecological Appraisal [10.08.01] have been undertaken, the latter of which seeks to establish an ecological baseline for future monitoring. While not designated currently at any level for its nature conservation value, the site does support priority habitats and species. However, there are no known ecological constraints so important as to preclude allocation, as summarised within section 18 of the Ashton Moss West Allocation Topic Paper [10.08.11] . Policy JP-G9 also requires appropriate assessment at the application stage and Policy JPA30 recognises existing formal and informal recreational routes through policy points 12, 13, 14, 15, 16 17 and 18, requiring development of the site to incorporate a range of green infrastructure and accessibility mitigation as appropriate.
4	Site is grade 2 agricultural land and there is the presence of underlying deep peaty soils.	No change is considered necessary. It is considered that a proportionate evidence base has been provided to support the policy. A Preliminary Geotechnical Report [10.08.04] and Factual Report on Ground Investigation [10.08.03] have been undertaken which demonstrate that whilst historically the site has been recorded as grade 2 or 3 agricultural land due to underlying peat, this has since been subject to the onsite placement of materials since. Further detail is provided within section 12 of the Ashton Moss West Allocation Topic Paper [10.08.11] and policy JPA30 recognises the need for development proposals to be informed by a detailed earthworks and remediation strategy. Policy JP-G9 at paragraph 8.53 recognises that while development would ordinarily be directed away from such valuable soils, given the overall scale of development that needs to be accommodated, a limited amount of development on higher grade agricultural land is necessary.

Row	Main Issue	PfE Response
5	Site ground conditions mean that it cannot be viably developed.	No change is considered necessary. A proportionate evidence base is considered to support the allocation of the site. A Stage 2 Strategic Viability Assessment [03.03.04] has been undertaken, as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11] , chapter 25, which concludes for the allocation that development is viable, with a positive residual value.
6	Site has existing drainage issues.	No change is considered necessary. A proportionate evidence base is considered to support the allocation of the site. A Strategic Flood Risk Assessment [04.02.01] has been undertaken, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment (Appendix B Sites Assessment Part 2) [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to flood risk.

PfE 2021 Policy JPA31 – Godley Green Garden Village

Row	Main Issue	PfE Response
1	Objections to removal of the site from Green Belt with lack of consideration given to the alternatives. Brownfield sites should be prioritised and there is no justification for removal from the Green Belt.	PfE sets out a clear preference of using previously developed (brownfield) land. However, a limited amount of development is required on greenfield and Green Belt land such as at Godley Green 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. The exceptional circumstances for amending the Green Belt boundary are set out in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12] . Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] and the Site Selection Background Paper [03.04.01] sets out the process used to select the site. Therefore, no change is considered necessary.
2	There will be a substantial impact on highway infrastructure from the additional traffic generated.	The impact on highway infrastructure has been considered in the Transport Locality Assessment - Tameside allocations document [09.01.14] and Addendum [09.01.26] , and summarised in section 10 of the Godley Green Garden Village topic Paper [10.08.12] . Mitigation measures have been identified and the Locality Assessment concludes the impact arising from the allocation as well as the cumulative impact of other GMSF allocations to be less than severe subject to the implementation of mitigation as suggested. The existing Locality Assessment and mitigation required will be refined at the planning application stage, with Policy JP-C 7 setting out a requirement for planning applications to be accompanied by a Transport Assessment and Travel Plan where appropriate. Therefore, no change is considered necessary.
3	There is existing strain on social infrastructure such as schools, doctors, dentists and hospitals such that services cannot cope with added demand.	Policy JPA31 requires developer contributions are provided towards education, health, transport and other infrastructure as deemed appropriate. Consideration of social infrastructure is set out in Section D of the JPA31 Godley Green Garden Village Allocation Topic Paper [10.08.12] . Detailed discussions on contributions to social infrastructure provision will be set out at the planning application stage. Policy JP-P 6 supports improvements in health facilities and requires new developments that would significantly increase demand to, where appropriate, provide new or improved health facilities as part of the development. Policy JP-P 6 also requires developments that are subject to an Environmental Impact Assessment be supported by a Health Impact Assessment. Therefore, no change is considered necessary.
4	The site is important for recreational as well as ecological value with the presence of protected species and habitats. These will be lost should the site be developed.	Sections 15 and 18 of the Godley Green Garden Village Topic Paper [10.08.12] acknowledge the presence of SBIs, ecological features and protected species within the allocation boundary. A Preliminary Ecological Appraisal [10.08.05] and plan-wide Habitat Regulation Assessment [02.02.01] accompany the allocation. It was concluded that a planning application would require appropriate survey for badger and amphibians alongside an extended Phase 1 habitat survey. Policy JPA31 requires development of the site to protect and enhance the SBIs and protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Development of the site will be required to be in accordance with the wider thematic policies of the plan including JP-G 7 and JP-G 9. Therefore, no change is considered necessary.
5	There is existing flooding in the area and the site is important for drainage and absorbing rainfall. Developing	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including being assessed as part of the Plan-wide Level 1 Strategic Flood Risk Assessment (SFRA) [04.02.01] and summarised in Section B, part 11 of JPA31 Topic Paper [10.08.12] . The SFRA identified the site as being wholly within Flood Zone 1 which presents lowest risk and concluded a Flood Risk Assessment would be required for development of the site at the planning application stage. Paragraphs 11.289 and 11.290 of the Plan state development of the allocation should be

Row	Main Issue	PfE Response
	the site will increase the risk of flooding.	<p>accompanied by an integrated approach to delivering infrastructure, to include a site-wide drainage strategy that incorporates sustainable drainage systems.</p> <p>In addition, the Plan should be read as a whole and Policy JP-S 5 sets out policy requirements in terms of managing flood risk. Therefore, no change is considered necessary.</p>

PfE 2021 Policy JPA32 – South of Hyde

Row	Main Issue	PfE Response
1	Too much focus on executive homes with not enough affordable housing being provided.	Policy JPA32 identifies the potential to deliver around 440 new homes across a range of types and tenures in accordance with the Council's most up to date Housing Needs Assessment . The Plan should be read as a whole and Policy JP-H 2 sets out the approach to affordability of new housing.
2	Objections to removal of the site from Green Belt with lack of consideration given to the alternatives. Brownfield sites should be prioritised and there is no justification for removal from the Green Belt.	PfE sets out a clear preference of using previously developed (brownfield) land. However, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde 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. The exceptional circumstances for amending the Green Belt boundary are set out in the Green Belt Topic Paper [07.01.25] and in section 14 of the JPA32 Topic Paper [10.08.13] . Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10] and the Site Selection Background Paper [03.04.01] sets out the process used to select the site. Therefore, no change is considered as necessary.
3	There will be a substantial impact on highway infrastructure due to the amount of traffic and the lack of reliable and good quality public transport.	The impact on highway infrastructure has been considered in the Transport Locality Assessment - Tameside allocations document [09.01.14] and Addendum [09.01.26] , and summarised in section 10 of the JPA32 Topic Paper [10.08.13] . Mitigation measures have been identified and the Locality Assessment concludes the impact arising from the allocation as well as the cumulative impact of other GMSF allocations to be less than severe subject to the implementation of mitigation as suggested. The existing Locality Assessment and mitigation required will be refined at the planning application stage, with Policy JP-C 7 setting out a requirement for planning applications to be accompanied by a Transport Assessment and Travel Plan where appropriate. Therefore, no change is considered as necessary.
4	There is existing strain on schools, doctors, dentists and hospitals and they cannot cope with added demand.	Policy JPA32 requires developer contributions are provided towards education, health, transport and other infrastructure as deemed appropriate. Consideration of social infrastructure is set out in Section D of the JPA32 Topic Paper [10.08.13] . Detailed discussions on contributions to social infrastructure provision will be set out at the planning application stage. Policy JP-P 6 supports improvements in health facilities and requires new developments that would significantly increase demand to, where appropriate, provide new or improved health facilities as part of the development. Policy JP-P 6 also requires developments that are subject to an Environmental Impact Assessment be supported by a Health Impact Assessment. Therefore, no change is considered as necessary.
5	The site is important for recreational value as well as its ecological value with the presence of protected species and habitats. These will be lost should the site be developed.	Sections 15 and 18 of the JPA32 Topic Paper [10.08.13] acknowledge the presence of SBIs, ecological features and protected species within the allocation boundary. A Preliminary Ecological Appraisal [10.08.07] and plan-wide Habitat Regulation Assessment [02.02.01] accompany the allocation. It was concluded that there were no known ecological constraints which are so important so as to preclude allocation of the site. However, ecological mitigation and compensation will likely be needed to avoid harm to important habitats and species which are known to be present and also that further surveys are conducted, including an Extended Phase 1 Habitat Survey in addition to a number of species surveys.

Row	Main Issue	PfE Response
		<p>Policy JPA32 requires development of the site to protect and enhance the SBIs and protect and enhance key landscape and ecological features. Development of the site will be required to be in accordance with the wider thematic policies of the plan including JP-G 7 and JP-G 9. Therefore, no change is considered as necessary.</p>
6	<p>Existing flooding and increased flood risk caused by the proposed development were of major concern.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Strategic Flood Risk Assessment (SFRA) has been undertaken and Section B, part 11 of JPA32 Topic Paper [10.08.13] summarises its outcomes and recommendations. In response to this a range of potential mitigation measures have been identified and therefore, the SFRA indicates that the allocation is developable, subject to mitigation measures. Therefore, no change is considered as necessary.</p>
7	<p>Although there is support for the restoration and re-use of the Grade II* at risk Apethorn Farm the quantum of development proposed was seen as excessive and potentially damaging to the setting of that designated heritage asset and others.</p>	<p>Section C Part 20 of JPA32 Topic Paper [10.08.13] summarises the South of Hyde Historic Environment Assessment [10.08.08] (HEA). This HEA informed the policy wording of JPA32. A Heritage Impact Assessment will also be required to support the masterplanning of the site and any subsequent planning applications and it will ensure the proposed new development has a positive impact on the heritage asset's conservation and setting whilst securing sensitive restoration and, long term future reuse. The HEA also recommends that those areas of archaeological potential identified in the assessment be subject to a programme of field investigations early in the planning process. Therefore, no change is considered as necessary.</p>

Chapter 11 – Allocations (Trafford)

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

PfE 2021 Policy JP Allocation 33 New Carrington

Row	Main Issue	PfE Response
1	Concern about the scale of development across the New Carrington site. Development could lead to a loss of local identity across three different communities.	<p>No change is considered necessary. New Carrington provides a rare opportunity to deliver housing and employment opportunities at a significant scale, alongside infrastructure. The site will make a significant contribution to meeting housing needs in both Trafford and across the PfE plan area. The allocation reflects the overarching PfE Spatial Strategy – see Growth and Spatial Options Paper [02.01.10], Site Selection Background Paper [03.04.01] and JPA33 New Carrington Allocation Topic Paper [10.09.07].</p> <p>Policy JP-A 33 also requires new development to be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character. See also JPA33 New Carrington Allocation Topic Paper [10.09.07] and New Carrington Masterplan [10.09.06].</p>
2	Concerns over the deliverability of the allocation, considering its scale, infrastructure requirements and previous uses on the brownfield land.	<p>No change is considered necessary. The PfE New Carrington Masterplan considered the likely delivery rates for a site of this scale and the figures included in PfE are considered to be realistic, deliverable, and in line with industry best practice. See JPA33 New Carrington Allocation Topic Paper [10.09.07] Section E 'Deliverability' and New Carrington Masterplan [10.09.06].</p>
3	Development that can be delivered in the short term should not be restricted from proceeding provided that it can be demonstrated that this would not prejudice the delivery of the wider development.	<p>No change is considered necessary. The PfE New Carrington Masterplan sets out a high level development phasing schedule for the whole site. It will be important that development of the New Carrington site comes forward in a coordinated way, alongside infrastructure delivery. Each development parcel must therefore make a proportionate contribution to the overall infrastructure requirements for the site and Policy JPA-33 therefore requires an 'equalisation mechanism' which will be set out in the future masterplan/SPD. See New Carrington Masterplan [10.09.06] and JPA33 New Carrington Allocation Topic Paper [10.09.07].</p>
4	More affordable housing should be provided, which meets the range of housing needs.	<p>No change is considered necessary. Policy JP-A 33 requires development to provide a minimum of 15% affordable housing across New Carrington, although it is considered that some areas could deliver significantly in excess of this and further information will be provided as part of the future Masterplan / Trafford Local Plan.</p> <p>Policy JP-A 33 also requires development to deliver a range of house types, sizes, layouts and tenures through a place-led approach based on each of the Character Areas and further detail will be set out in the future New Carrington Masterplan / SPD and the Trafford Local Plan. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07].</p>

Row	Main Issue	PfE Response
5	<p>Objections to the loss of Green Belt land. The proposed loss of green space will have a negative impact on health and wellbeing.</p>	<p>No change is considered necessary. The PfE Plan sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs in line with NPPF. However, given the scale of development required to meet the objectives of the Plan, a limited amount of development is identified on land outside of the urban area on greenfield and/or Green Belt land. The details of the employment land needs and supply can be found in the Employment Topic Paper [05.01.04], the details of the housing land needs and supply can be found in the Housing Topic Paper [06.01.03].</p> <p>The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt Topic Paper and Case for Exceptional Circumstances (July 2021) [07.01.25].</p> <p>In addition, Policy JP-A 33 requires development to provide significant areas of open and accessible green space throughout the allocation as part of the wider strategic green infrastructure network. The policy also requires improvements to the land which will remain in the Green Belt – see GM Green Belt Study-Beneficial Use-Appendix I Trafford [07.01.20].</p>
6	<p>Remove additional land from the Green Belt for development. Specific sites have been put forward for development which are currently proposed to stay in the Green Belt.</p>	<p>No change is considered necessary. See Green Belt Topic Paper [07.01.25] and JPA33 New Carrington Allocation Topic Paper [10.09.07] section Green Belt Assessment which justify the proposed Green Belt boundaries for the allocation.</p> <p>The PfE Green Belt Assessment [07.01.04] and Green Belt Study – assessment of proposed 2020 GMSF Allocations [07.01.10], as well as the New Carrington Masterplan [10.09.06] have informed the development parcels identified within the New Carrington allocation. Sufficient land has been identified across Trafford to meet the PfE housing requirement and therefore no additional land is required.</p>
7	<p>Concern about existing congestion issues on the local road network and the SRN, and the impact of increased traffic from the development. Existing public transport and highway network is limited.</p>	<p>No change is considered necessary. Policy JP-A 33 states that development will need to be supported by major investment in transport infrastructure. Various transport interventions have been identified which will need to be delivered alongside the development to enable modal shift to sustainable travel moves. Further detail is in the New Carrington Transport Locality Assessment [09.01.15] and [09.01.27].</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 [09.01.01] and the GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02].</p>

Row	Main Issue	PfE Response
8	<p>Concern about the proposed Carrington Relief Road (CRR) and the lack of consultation on this proposal.</p> <p>Development which is not reliant on the CRR should be able to come forward in advance of it.</p>	<p>No change is considered necessary. The Carrington Relief Road is a longstanding proposal for the Carrington area, which has been identified in previous Trafford Local Plan documents, including the Core Strategy 2012. The route is identified as an infrastructure requirement in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27]. Although outside of PfE, a consultation was held on route options in 2021 and a planning application is expected in 2023.</p> <p>The Carrington Relief Road is identified as an infrastructure requirement in Policy JP-A 33 New Carrington and the New Carrington Locality Assessment [09.01.15] and [09.01.27]. All development parcels will be expected to make a proportionate contribution to infrastructure delivery.</p>
9	<p>Concerns that health care facilities and schools will have additional pressure on them from new development</p>	<p>No change is considered necessary. Policy JP-A 33 requires development to support the necessary infrastructure including health facilities and schools. This reflects Policies, JP-G6, JP-P1 and JP- D2 which state that new development must be supported by the necessary infrastructure. See New Carrington Allocation Topic Paper [10.09.07] Section 24 (Education) and Section 25 (Health).</p>
10	<p>Concern about the loss of wildlife habitats and concern regarding the potential loss of mossland, which should be retained for its biodiversity value and as a carbon store.</p> <p>Development could undermine the viability of the Great Manchester Wetland Nature Recovery network.</p>	<p>No change is considered necessary. Development which impacts protected sites should be avoided and any impacts which do occur will need to be suitably mitigated. Policy JP-A 33 requires development to protect and enhance natural environment assets and to deliver a net gain in biodiversity. Significant areas within the New Carrington allocation will remain open and their biodiversity value will be improved, Policy JP-A 33 criterion 33 supports the creation of wetland areas within the site. The site is also identified in Policy JP-G 2 as a Green Infrastructure Opportunity Area. In addition Policies in the 'Greener Places' chapter include various requirements relating to the Green Infrastructure network and biodiversity net-gain.</p> <p>In relation to the mossland, further work will be required to assess the depth and extent of any peat within the site, to ensure that the most valuable areas are retained as part of the wider green infrastructure strategy. The findings of this will then inform the detailed Masterplan. Policy JP-G4 outlines the importance of mossland for their habitats and wider landscape and there is a strong emphasis in the Plan on their retention and improvement.</p> <p>Policy JP-A 33, as well as other PfE policies, will ensure that impact on the Great Manchester Wetlands Nature Improvement Area (NIA) is minimised. See JP-A 33 New Carrington Allocation Topic Paper [10.09.07].</p>
11	<p>Development will contribute to global warming and it goes against the declaration of a climate emergency and aim to be carbon neutral. Further information is required on how development has been assessed to take this into account.</p>	<p>No change is considered necessary. The site was subject to assessment as part of the PfE Integrated Assessment (IA). This assessment considered the policies in relation to climate indicators. Additionally policies elsewhere in the Plan, particularly within Chapter 5, provide policy requirements in relation to this matter</p>

Row	Main Issue	PfE Response
12	Carrington Moss floods on a regular basis and helps to prevent flooding.	No change is considered necessary. The PfE is supported by a Strategic Flood Risk Assessment – see [04.02.01] . Policy JP-A 33 also requires development to mitigate flood risk and surface water management through the design and layout of development and in accordance with a comprehensive drainage strategy. See JPA33 New Carrington Allocation Topic Paper [10.09.07] , section 11 (Flood Risk and Drainage). Site specific flood risk assessment(s) will be required as part of any planning application as subject to the provisions of footnote 55 of the NPPF.

Chapter 11 – Allocations (Wigan)

The main issues raised in relation to the policies within PfE 2021 Chapter 11 – Allocations (Wigan) and the relevant respondents to PfE 2021 is set out below.

PfE 2021 Policy JPA34 – M6 Junction 25, Wigan

Row	Main Issue	PfE Response
1	The need for warehouses on the site does not amount to exceptional circumstances to outweigh the significant harm to the Green Belt.	Section 14 of the M6 Junction 25 Topic Paper (10.10.11) summarises the findings of the 2020 Green Belt Harm Assessment which concludes that the release of the allocation as a whole would have a detrimental impact upon the functioning of the Green Belt and the open character of this location. Its findings were considered at the public inquiry for the Tritax Symmetry planning application in 2020, where it was concluded that the benefits of the proposed development, primarily in terms of how it would support economic growth, clearly outweigh its potential harm to the Green Belt by reason of inappropriateness and other harm. The quantitative and qualitative need for high quality logistics development in the borough, and the demand for such provision along the M6 Corridor was recognised, as was the borough's poor employment land take up rates due to qualitative and quantitative constraints on its employment land supply.
2	The local road network and the M6 Motorway are already congested at peak times. The site should not be developed without supporting highway infrastructure works, including a two-way junction at M6 Junction 25.	The Locality Assessment, as summarised in Section 10 of the M6 Junction 25 Topic Paper (10.10.11) , and the Transport Assessment in support of the approved Tritax Symmetry planning application (approved at Public Inquiry in 2020) have assessed the impact of the proposed development on the local highway network and conclude that the proposed development is acceptable in highway terms, subject to mitigation measures, and does not require the delivery of an all-ways junction at Junction 25.
3	Increased noise and air pollution will have a negative impact on the health and wellbeing of local people.	Sections 21 and 22 of the of the M6 Junction 25 Topic Paper (10.10.11) summarise the assessments undertaken in relation to air quality and noise pollution in support of the Tritax Symmetry planning application. At the public inquiry, the Planning Inspector was satisfied that the proposed development would not result in an unacceptable impact in terms of air quality, noise, vibration or residential amenity due to adequate controls and mitigation.

PfE 2021 Policy JPA35 – North of Mosley Common

Row	Main Issue	PfE Response
1	The existing road network is already at full capacity at peak times. This proposal together with the other proposed PfE allocations and existing development commitments in the wider area will significantly exacerbate congestion. Significant improvements to existing road infrastructure, or a new bypass, are required to reduce the severe traffic congestion in the area and to improve road safety.	As set out in Section 10 of the Topic Paper (10.10.12), the Locality Assessment has assessed the impact of the proposed development on the local highway network and concludes that the proposed development is acceptable in highway terms, subject to mitigation measures. This is covered in clause 5 of the policy which requires the development to deliver necessary highway capacity improvements to mitigate its impact.
2	Mosley Common is poorly served by public transport, including to locations such as south Manchester and Warrington where many people work. The allocation is not within walking distance of the Guided Busway or the nearest train stations at Atherton and Walkden. Public transport capacity needs to be assessed and provision improved.	There are a variety of sustainable travel options available from the site, as set out in Section 10 of the North of Mosley Common Topic Paper (10.10.12) and the Wigan Locality Assessment (09.01.16). The LSM Busway crosses the site and the policy requires the provision of an additional stop and / or new / improved pedestrian and cycle links to existing busway stops, and a proportional and meaningful contribution to increasing passenger capacity at peak times. A number of other bus routes pass close to the allocation, providing frequent services to Manchester, Salford, Leigh, Bolton, the Trafford Centre and Wigan. The policy also requires the retention and enhancement of existing public rights of way and the creation of new footpaths to ensure safe and convenient access for pedestrians and cyclists to services and amenities, including bus services.
3	Local primary and secondary schools, GP surgeries and dentists are at full capacity, and there is no evidence demonstrating that they will be able to accommodate additional demand generated from the site.	The impact of the proposed allocation on school and health capacity has been assessed and the conclusions are set out in section D of the North of Mosley Common Topic Paper (10.10.12). Clauses 7 and 8 of the site allocation policy set out how the development will be required to meet additional demand generated by the development.
4	Habitats on the site, including Honksford Brook, ponds, and areas that act as wildlife corridors or foraging sites, will be lost or damaged if development goes ahead. These areas are important to a wide variety of species, including priority species. An updated and assessment of habitats and species contained within the development needs to be provided.	A summary of the ecological / biodiversity assessment and the Habitats Regulations Assessment of the site is set out in sections 18 and 19 of the North of Mosley Common Topic Paper (10.10.12). The policy requires the protection and enhancement of the environs of Honksford Brook through the creation of a green infrastructure corridor. Planning applications will be subject to the requirements of Policy JP-G9, which sets out expectations for development in terms of biodiversity and requires robust evidence to be provided in support of applications.

PfE 2021 Policy JPA36 – Pocket Nook, Lowton

Row	Main Issue	PfE Response
1	The landowner of a strategic part of the site is unwilling to sell and there is growing concern around the use of compulsory purchase.	<p>The principle of development at Pocket Nook, which is not in the Green Belt, is established in Policy SP4 of the Local Plan Core Strategy which identifies it within a broad location for new development.</p> <p>The unwilling landowner owns a strategic part of the site. Removing this from the allocation would jeopardise the delivery of the proposed through road which will enhance traffic flow and help to mitigate congestion in the area. A notable proportion of the unwilling landowner's land is likely to be compulsory purchased by the Government to facilitate the delivery of High Speed 2. The Council also has CPO powers within its remit to facilitate, if necessary, the wider comprehensive development of this site. However, the use of CPO powers will be a last resort and only used if an alternative resolution cannot be found.</p>
2	HS2 is proposed to cross north-south across the site, which raises doubts about its viability and deliverability.	The Government introduced the High Speed Rail (Crewe – Manchester) Bill into Parliament in January 2022 to secure the powers to construct and maintain HS2 Phase 2b, which is proposed to cross the Pocket Nook site. Regardless, should the Golborne Link (the section of HS2 Phase 2b proposed to cross the site) not materialise, the site will be more straightforward to deliver, without the need to bridge HS2, and could deliver more homes.
3	Peak traffic is congested at a range of junctions within the area including the A580 East Lancashire Road, A579 Atherleigh Way, Newton Road, Milldale Road, Lane Head, St Helens Road, Kenyon Road and Winwick Lane.	As set out in Section 10 of the Site Allocation Topic Paper (10.10.13), the Locality Assessment has assessed the impact of the proposed development on the local highway network, including the capacity of ten junctions close to the allocation, and concludes that the proposed development is acceptable in highway terms.
4	The current infrastructure, both highways and social amenities such as doctors, dentists and school places, are insufficient to maintain existing population level and will require significant improvement to accommodate the increased housing and population in the area.	No change is considered necessary. Consultation with education and health providers has confirmed that new provision is not required within the allocation to address local needs. However, developers will be required to make an appropriate financial contribution, through a planning obligation or planning condition, based on an analysis of need at the planning application stage, to mitigate any education and/or health needs arising from the development.

PfE 2021 Policy JPA37 – West of Gibfield

Row	Main Issue	PfE Response
1	The site and the other nearby large development sites will result in significant harm to the Green Belt, in terms of urban sprawl, and the merger of Atherton and Westhoughton, and result in substantial loss of farmland and open spaces.	No change is considered necessary. As set out in Section 14 of the West of Gibfield Topic Paper (10.10.14), the site's release would result in harm to the Green Belt, particularly in the northern part of the allocation. However, the Council considers that the benefits of the proposed allocation, as set out in the Topic Paper, significantly outweigh its overall harm, representing exceptional circumstances in accordance with national planning policy. A significant proportion of the allocation will be retained within the Green Belt and developed as a country park.
2	The existing road network is already overcapacity at peak times and this proposal, together with other proposed allocations and existing development commitments in the area, will exacerbate this. New road infrastructure is desperately needed before any more traffic is generated.	As set out in Section 10 of the Topic Paper (10.10.14), The Locality Assessment concludes that the proposed development is acceptable in highway terms, subject to mitigation measures. This is covered in clause 5 of the policy. The policy also requires the development to safeguard sufficient land to allow for a potential future extension of Gibfield Park Way northwards to the M61.
3	The development will sever the existing wildlife corridor, causing the loss of habitats and species, some of which are protected. Parts of the wildlife corridor serves as mitigation for previous development proposals in the area.	As set out in clause 8 of Policy JP Allocation 37, the development will provide a substantive accessible green infrastructure corridor and country park on land remaining in the Green Belt within the allocation. The country park will provide enhanced and accessible recreation opportunities within the area, benefitting the health and wellbeing of local residents, and contribute towards achieving a biodiversity net gain.
4	Local schools, GP surgeries and dentists are at full capacity, and there is no evidence demonstrating that they will be able to accommodate additional demand generated from the site.	No change is considered necessary. As set out in Sections 23 and 24 of the West of Gibfield Topic Paper (10.10.14), consultation with education and health providers has confirmed that new on-site provision is not required to address local needs. However, policies JP-P5 and JP-P6, and policies within the Wigan Local Plan, will require developers to make appropriate financial contributions to mitigate any education and/or health needs arising from the development.