

Chapter 11 – Site Allocations (Rochdale)

A summary of the 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 19 – Bamford / Norden

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle / scale of development		
JPA19.1	Proposals comprise unsustainable development and do not comply with national policy.	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]	See Appendix.
JPA19.2	Support for allocation.	Support is noted	Peel L&P Investments (North) Ltd
JPA19.3	Area is already over-developed – development will represent further over-development of the area.	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.	Anne Shorrocks Susan Bunting David Wilcox Paul Kallee-Grover Gillian Saunders Barbara Lloyd Trevor Mayne
JPA19.4	Concerns regarding impact on existing residential homes within the boundary of the development (e.g. Bamford Mews).	The Bamford/Norden Allocation Topic Paper 10.06.35 deals with a range of issues relating to the quality of life for existing and future residents. This has resulted in the criteria included in the policy which seek to protect the amenity of local residents. The Topic Paper concludes that the allocation accords with relevant economic, social and environmental objectives. The plan as a whole seeks to safeguard and improve quality of life of local residents, for example policy JP-P 1 which focusses on the delivery of sustainable places.	Daniel Parkin

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		Local policies and guidance also include requirements for new development in terms of its impact on adjacent properties.	
JPA19.5	Additional homes are not needed in the area - housing demand is already met / there is no unmet housing need for a development of this scale.	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]	See Appendix.
JPA19.6	Concerns over the inclusion of the playing fields within the boundary of the allocation (resist the loss of recreational open space / access land and impact on the health of local young people)	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.	See Appendix.
JPA19.7	Any fields 'retained' for recreation are likely to be built on in the future.	See response in line JPA19.6 As these pitches are identified in the Council's Playing Pitch Strategy, any improved facilities would be protected through appropriate Local Plan policies and guidance in NPPF.	See Appendix.
	Housing		
JPA19.8	More affordable and social housing is needed / executive homes as proposed are not needed in the local area.	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. 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. This	See Appendix.

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		Plan allocates a small number of sites in the northern areas specifically to increase attractiveness of the northern areas to highly paid, highly skilled workers, including at such sites Bamford/Norden in Rochdale (Policy JP Allocation 19 'Bamford / Norden')	
JPA19.9	The proposed housing density does not make efficient use of land.	See response in line JPA19.8. The density reflects the need to deliver higher-value housing which is a key object of this allocation as set out in criterion 1 of policy JP Allocation 19 and paragraph 11.213 of the supporting text.	See Appendix.
JPA19.10	The need for additional homes in the borough is recognised.	Comment is noted.	Claire Lomas
	Employment and Economy		
JPA19.11	There are no high end jobs in the local area for the high end houses proposed.	A key element of the Strategy [JP-Strat 6] within the plan is to boost the competitiveness of the north of the conurbation, including Rochdale. This will be achieved through the delivery of the North East Growth Corridor [JP-Strat 7] which will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix.	Ian Warrington Nick Lonergan
JPA19.12	A loss of greenbelt will detract from the overall attractiveness of the area resulting in less visitors and a reduced local economy.	Policy JP Allocation 19 seeks to deliver a high quality scheme incorporating green and blue infrastructure, retained and enhanced recreational facilities and safe and attractive walking and cycling routes. Criterion 9 of this policy requires any development to take account of any visual impact from Ashworth Valley to the west given the high landscape and recreational value of that area and ensure there are high quality links/routes to the wider countryside. It is therefore considered that there would be no negative impacts on visitors and the local economy.	John Taylor Norman Eames Sharon Eames Elaine Garner Andrew Friend Save Royton's Greenbelt Community Group
	Green Belt		
JPA19.13	Contradicts green belt policy on preventing the unrestricted sprawl of urban areas	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.	Paul Roebuck Wendy Connolly Michael Hall Michael Davis

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JPA19.14	Proposals comprise inappropriate green belt development - exceptional circumstances have not been demonstrated	See response in line JPA19.13	See Appendix.
	Brownfield		
JPA19.15	Brownfield alternatives should be considered ahead of green belt.	See response in line JPA19.1	See Appendix.
JPA19.16	Additional brownfield sites identified after the pandemic should be factored in before green belt is developed	See response in line JPA19.1. Meeting the needs of the plan area is based on the most up to date baseline supply information that was available to inform the plan. This is set out in the Housing Topic Paper (06.01.03) .	See Appendix.
JPA19.17	The density of proposed housing on existing brownfield sites should be increased.	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) .	Robert Aston Andrew Marshall
	Transport		
JPA19.18	Concerns about access for emergency vehicles and additional traffic impact on movement of emergency vehicles	Section 10 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with transport matters relating to this site, including 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 the access and movement of emergency vehicles. Any detailed proposal for the site will need to demonstrate appropriate access for emergency vehicles in line with highway standards.	Jane Hanna Catherine Hanna
JPA19.19	The fifth criterion should be modified to refer to a secondary access from Furbarn Road.	The Locality Assessment produced for this site [09.01.12] considered access points off Norden Road and this formed the basis for the modelling and subsequent mitigations. These demonstrate that the site is deliverable in transport terms. Access from Furbarn Road was not considered and therefore would need to be evidenced through a Transport Assessment as part of any subsequent planning application. Therefore, no change to the policy is considered necessary.	Nick Graham
JPA19.20	Concerns regarding the safety of users on remaining public footpaths / bridleways	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	John Williams

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		around the site. Therefore, the safety of users should be improved rather than diminished.	
JPA19.21	Access roads to the development are insufficient.	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. High level modelling detailed in the Bamford / Norden allocation Locality Assessment Section 10 indicates a single access on Norden Road could accommodate the allocation traffic but to allow flexibility, the final layout may include additional points of access.	See Appendix.
JPA19.22	One way system will not control additional traffic pressure, will create rat runs elsewhere.	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.	See Appendix.
JPA19.23	Concerns about road safety generally.	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. This includes pedestrian and cycling improvements. All measures will be subject to safety audits to ensure they meet the requisite design and safety standards.	See Appendix.
JPA19.24	Local roads are at full traffic capacity & congested, with existing bottlenecks and particularly bad at peak times – adding more cars to the local network will impact on large number of residents / commuters.	See response to JPA19.18.	See Appendix.

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JPA19.25	Current road maintenance in the area is terrible. Extra development will increase this problem.	The issue of road maintenance is outside the scope of the PfE plan.	Duncan Hopton
JPA19.26	Proposals do not promote sustainable transport.	Criterion 7 of policy JP Allocation 19 requires the development to contribute to the potential extension of the proposed bus rapid transit services between Heywood and Manchester. This proposal along with the upgrading of bus stops is set out in paragraph 10.7 of the Bamford/Norden Allocation Topic Paper 10.06.35 . 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. This along with mitigation measures identified in Section 10 (Transport) of the Bamford/Norden Allocation Topic Paper 10.06.35 to create/improve crossings around the site will encourage active travel.	See Appendix.
JPA19.27	Area has poor public transport / minimal active transport & high car dependence.	See response in line JPA19.26.	See Appendix.
JPA19.28	Increase in pollution / impact on air quality (impact on nearby AQ zone).	Policy JP-S 6 of the plan sets out a comprehensive range of measures to support improvements in air quality. Section 21 of Bamford/Norden Allocation Topic Paper 10.06.35 considers the issue of air quality in relation to this allocation. Criterion 8 of the policy requires the development to deliver appropriate access to electric vehicle charging infrastructure and cycle storage. Both of these will have a positive impact on reducing air pollution.	See Appendix.
JPA19.29	Increased traffic will impact on physical and mental health of local residents.	See response in line JPA19.26. These measures, along with other transport mitigations are intended to ensure that there is no greater impact on traffic as a result of the development. In addition, the plan as a whole seeks to safeguard and improve quality of life of local residents, for example policy JP-P 1 which focusses on the delivery of sustainable places.	See Appendix.
JPA19.30	Proposals are not close to rail links and motorways / out of town.	See response in line JPA19.26 in terms of sustainable transport. Paragraph 3.4 of the Bamford/Norden Allocation Topic Paper 10.06.35 notes that the site currently has good access to a number of local bus services serving Rochdale and Bury town centres. Both of these destinations offer tram and/or train links. Whilst this site is not	See Appendix.

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		adjacent to a motorway, access to the strategic motorway network is still good compare with some other parts of the conurbation.	
JPA19.31	A shift to EVs will reduce exhaust emissions but will only make a limited difference to particulate pollution.	Section 21 of the Bamford / Norden Allocation Topic Paper outlines the Air Quality Statement / Assessment process required as part of the planning submission for the allocation. This focuses on assessing the impact of the allocation on existing NO ₂ and particulate emissions if required mitigations to address any adverse impacts. This supports PfE Policy JP-S 6, which reflects the most recent development and planning control guidance.	Andrew Drummond Barry Lewis
JPA19.32	The increase in traffic will result in an unacceptable impact on the health of users of the community facilities and playing fields on the site.	See response in line JPA19.29.	Nicola Hudson
JPA19.33	Expansion of leisure facilities to provide for the wider population will increase traffic to and from the site.	The response in line JPA19.26 notes planned improvements to sustainable travel. Improvements to active travel routes in particular would help to reduce traffic by reducing the number of shorter trips made by car.	Lesley Spencer
	Physical Infrastructure		
JPA19.34	Concerns regarding ground conditions (history of coal mining) and impact of additional traffic on ground stability	Section 12 of the Bamford/Norden Allocation Topic Paper 10.06.35 considers issues in relation to ground conditions. This concludes that although the site is predominately greenfield some further investigation may still be required at planning application stage.	Helen Bingham Anne Shorrocks Paul Kallee-Grover Bamford Green Belt Action Group Edith Mills
JPA19.35	Concerns over impact on sewer system and waste collection.	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. Paragraph 12.14 of the supporting text to policy JP-D2 of the plan references the delivery of water and waste water infrastructure to support new development.	See Appendix.
JPA19.36	Concerns regarding electricity lines crossing site and impact on public health.	Paragraph 11.219 of the supporting text to policy JP Allocation 19 states that the layout of the development will also need to take account of the location of electricity pylons that cross the site. This could be linked to a high quality network of green infrastructure and landscaping within the scheme. This requirement has been	See Appendix.

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		included within the indicative masterplan in Appendix 3 of the Bamford/Norden Allocation Topic Paper 10.06.35	
JPA19.37	No clear plans to assure infrastructure adaptations / the plans fail to forecast or model how different scenarios might impact, for example number of school aged children, number of cars per household etc.	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.	Simon Lord
JPA19.38	Minerals safeguarding areas and minerals infrastructure safeguarding should be shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
	Social Infrastructure		
JPA19.39	Schools already at capacity - no capacity for new development and no plans to provide additional places / schools.	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.	See Appendix.
JPA19.40	Lack of local plans to build new infrastructure to relieve additional pressure on education and other services such as medical facilities that are already oversubscribed.	See response in line JPA19.37.	See Appendix.
JPA19.41	Identified shortage of doctors / dentists and medical services in the local area.	See response in line JPA19.37. Section 24 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with matters relating to health.	See Appendix.
JPA19.42	Area is lacking in community facilities, shops and open green space / parks.	In terms of community facilities, paragraph 11.214 of the supporting text to policy JP Allocation 20 notes that the improvement to the retained sporting facilities should include, amongst other things, a replacement pavilion incorporating necessary changing facilities and community space.	See Appendix.

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		There are also existing local shops, including a convenience store directly opposite the site. Criterion 2 of the policy requires the provision of green and blue infrastructure. As a result, the indicative masterplan shows a network of open space additional to the retained recreational facilities and this would deliver informal open space and an area for children's play.	
JPA19.43	Contributions towards local community services should be provided by the developer.	See response in line JPA19.42.	Matthew Jackson
JPA19.44	Increased pressure on childcare services.	See response in line JPA19.39 in terms of education facilities which could also relate to nursery provision. A number of other childcare services are in private ownership and therefore this is a wider issue outside the scope of the plan.	Claire Lomas Daniel Jackson Barry Lewis Ian Smith
	Environmental		
JPA19.45	Resist the destruction of green spaces / loss of amenity space.	The parts of the site that are proposed for development are in private ownership with access restricted to rights of way. 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. These measures will help to create safe and attractive routes to the wider countryside, including Ashworth Valley.	See Appendix.
JPA19.46	Resist the loss of quality agricultural land.	Criterion 7 of policy JP-G9 seeks to safeguard the best and most versatile agricultural land. However, the last sentence of paragraph states given the overall scale of development that needs to be accommodated a limited amount of development on high grade agricultural land is necessary as it is critical to the delivery of wider development proposals.	Claire Bayman Anne Shorrocks Christine Hudson Nick Lonergan
JPA19.47	Proposals do not promote the health and well-being of communities / loss of site will have an adverse effect on mental and physical health / increase in cost of health care.	See response in line JPA19.45.	See Appendix.
JPA19.48	Site is a popular and well –used accessible local green space / green belt used for recreation.	See response in line JPA19.45.	See Appendix.

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JPA19.49	Site is the only local greenfield space with suitable access for elderly people to enjoy.	See response in line JPA19.45.	David Flynn Afia Saeed
JPA19.50	Unacceptable impact on landscape character / views of proposed development.	Section 17 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with issues relating to landscape. Criterion 9 of the policy requires any development to take account of any visual impact from Ashworth Valley to the west given the high landscape and recreational value of that area. In addition criterion 10 requires that any development preserves or enhances the setting of the listed Bamford United Reform Church immediately to the south of the site.	Ian Warrington Alan Donegan
JPA19.51	Resist the destruction of local wildlife habitats and protected species.	Section 18 of the Bamford/Norden Allocation Topic Paper 10.06.35 sets out matters in respect of ecology and biodiversity. Policy JP-G 9 of the plan provides further safeguards in respect of biodiversity including on sites identified for new development. This includes a requirement to achieve a net gain in biodiversity of at least 10%.	See Appendix.
JPA19.52	Unacceptable impact on nearby ancient woodland and conservation area.	See response in line JPA19.51.	Anne Shorrock
JPA19.53	Proposals do not align with climate change agenda / do not sufficiently address climate issues.	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.	See Appendix.
JPA19.54	Site should be used for tree planting not residential development.	Policy JP Allocation 19 identifies this as a housing site and is considered to be a sustainable site to meet the housing needs of the plan.	Derek Gregory
JPA19.55	There is no plan as to how biodiversity loss from the area is going to be mitigated.	See response in line JPA19.51.	Michael Cummings
	Flood Risk and Drainage		
JPA19.56	Site experiences annual flooding and poor drainage issues / water logging in the local area - development on flood plain will increase flood risk in the local area.	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	See Appendix.

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		site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage.	
JPA19.57	Unightly flood defences will be needed which has not been factored in.	See response in line JPA19.56.	John Langford
JPA19.58	Concerns about the effect of the development on flooding and the shifting of the natural water table.	See response in line JPA19.56.	Neil Crook Leigh Crook Katy Hoole
JPA19.59	Flooding causes raw sewage to overflow into gardens and the roads as well as the water board discharging excess water every ten minutes from the old reservoir which has also been built on.	See response in line JPA19.56.	Mark Hargreaves Daniel Hargreaves
JPA19.60	Following criteria to be added to policy: "Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options. Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved. Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards. There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided; New dwellings will be required to at least meet	See response in line JPA19.56 In addition, policy JP-S 5 of the PfE plan sets out the approach to sustainable drainage systems at the strategic level. Criterion 2 of the policy JP Allocation 19 references the need for an integrated green and blue infrastructure network. It is considered that the details of sustainable drainage can be addressed as part of further detailed masterplanning of the site based on these policy requirements. Therefore, no changes to the policy are considered necessary.	United Utilities Group PLC

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	the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Any proposal must have full regard to the existing utility infrastructure that passes through the site. Early dialogue will be required with United Utilities to understand the implications of this infrastructure on the detailed design and layout including changes in site levels. Consideration and inclusion of appropriate protective measures both during construction and during the lifetime of the development will be required."		
	Other		
JPA19.61	Comments regarding multiple ownerships and questioning deliverability.	Whilst the site is in multiple ownerships current information suggests that this would not prevent the delivery of the site.	Anne Shorrock Timothy O'Brien Joanne Morris Bamford Green Belt Action Group
JPA19.62	The area is of significant historical importance to warrant conservation - old footpaths and lanes leading to historical sites from the Industrial Revolution.	Section 20 of the Bamford/Norden Allocation Topic Paper 10.06.35 deals with matters relating to heritage. Criteria 4 and 10 of policy JP Allocation 19 set out requirements to protect areas of value in and around the site.	Ian Robinson Diane Robinson David Hinton Bamford Green Belt Action Group
JPA19.63	Council are only interested in the high income rates / revenue from new homes.	See responses in line JPA19.5 and JPA19.8.	See Appendix.
JPA19.64	Land owners have not been sufficiently informed of the process / plans.	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement.	Simon Lord Nigel Morrell
JPA19.65	Objection to policy requirements relating to archaeology (criterion 4) which are not justified. The policy should focus on a strategy for offsetting harm on assets of local and borough significance. Text in the last sentence following "the masterplan..." should be removed and replaced with "process should aim to establish the presence, extent, character, significance and, where possible, date of any archaeological remains across the site. This will inform final design	It is considered that the current wording in the policy is justified and is based on the recommendations of the Historic Environment assessment as summarised in paragraph 20.3 of the Bamford/Norden Allocation Topic Paper 10.06.35 . Therefore, no changes are considered necessary.	Peel L&P Investments (North) Ltd

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	proposals and enable an appropriate strategy to be formulated that will offset any harm from development on the archaeological resource."		
JPA19.66	The evidence and assessments supplied by the Developers are questionable and unsound and must be properly scrutinised before any planning permission is considered.	It is considered that a proportionate evidence base has been provided to support the policy. The Bamford/Norden Allocation Topic Paper 10.06.35 notes in a number of sections that further detailed work would be required on some matters to support a planning application.	Sonia Smith
JPA19.67	Bullet 10 should be revised to add a further sentence to the end to read: Proposals should be informed by the findings and recommendations of the Historic Environment (2020) in the Plan evidence base and any updated assessment submitted as part of the planning application process.	This is currently the final sentence of bullet 10. No change is necessary.	Historic England

PfE 2021 Policy JP Allocation 20 – Castleton Sidings

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 20.1	There is general support for using brownfield sites in preference over Green Belt/field sites	Support is noted	Tina Chester Karen Lever Lynne Hastings
JPA 20.2	This is a sustainable location and considered appropriate for development.	Support is noted	Kellen Homes
JPA 20.3	Any housing on this site needs to be well considered and suitable for the area.	Criteria 1 and 4 of policy JP Allocation 20 require the delivery of high quality housing as part of a well-designed comprehensive scheme.	Helen Lloyd-Higham
JPA 20.4	There is already plenty of housing available in this area and therefore no need for any more to be built.	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. As a result of this, Castleton has been identified as a key location for development in both the borough's Growth Plan and Rochdale Corridor Strategy.	Tracy Raftery
JPA 20.5	This area does not need expensive housing. It needs affordable housing that is green and suitable for young people.	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.	Helen Lloyd-Higham Vicky Harper
JPA 20.6	These houses will need to be well insulated as located next to a railway line. Oakland Flats had to insulate all the flats & use special glass as well	Criterion 11 of JP Allocation 20 requires acoustic attenuation to mitigate the potential visual and noise impact on the railway side of the land.	Michael Watts
JPA 20.7	Development will result in the deterioration in the quality of life for residents in all surrounding villages	The Castleton Sidings Allocation Topic Paper 10.06.36 deals with a range of issues relating to the quality of life for existing and future residents. This has resulted in the criteria included in the policy which seek to protect the amenity of local residents. The Topic Paper concludes that the allocation accords with relevant economic, social and environmental objectives.	Heywood, Middleton and Rochdale Conservative Cllr's

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		The plan as a whole seeks to safeguard and improve quality of life of local residents, for example policy JP-P 1 which focusses on the delivery of sustainable places.	
JPA 20.8	The recently vacated Wheatsheaf shopping centre provides a perfect example of a windfall site now presented for 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 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. The current land supply is as set out in the Housing Topic Paper 06.01.03 and represents a robust assessment of the land available to deliver housing over the plan period.	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 20.9	Given the history of the site it is clear that there will be a need to remediate in order to ensure that the site is safe for the proposed end users. Whilst some initial assessment has been undertaken on this it is noted that more intrusive investigations are still required	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 previously had an industrial use.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.10	Questions deliverability of the site due to the costs associated with site remediation. The site is unviable and unsound	This issue is addressed within Section 12 of the Castleton Sidings Allocation Topic Paper 10.06.36 which deals with ground conditions. 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.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.11	The plans do not include any eco homes	Policy JP-H3 of the plan deals with the type, design and mix of new housing. There is no specific reference to eco-homes in the policy as there is no specific requirements to deliver these set out in national guidance. However, this policy supports innovation in housing development where it is consistent with the principles of good design and contributes to local distinctiveness.	Vicky Harper
JPA 20.12	Paths to walk on have now disappeared due housing developments and industrial distribution sites. There are plenty of	This is a brownfield site which has no public access.	Sue Jagger

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	old brown field sites that can be reclaimed and used for these purposes and they would look better for it. Too much green Belt has been lost.	Criteria 3, 7 and 11 require the delivery of green space and walking and cycling routes as part of a comprehensive development.	
JPA 20.13	There are high value homes being built when the local economy does not reflect this need. The homeowners are likely to be commuters thus increasing local traffic.	Criteria 1 of policy JP Allocation 20 seeks to deliver high quality housing including higher value family housing on this site. The site can therefore deliver a mix of dwelling types including higher value family housing. 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. In terms of commuting, the site is highly accessible by both public transport and walking and cycling routes.	Lynne Hastings
JPA 20.14	More investment should be made in the local housing stock including grants for home insulation, roof repair, brickwork and retrofitting heat and electrics.	Paragraph 7.11 of the PfE plan sets out the importance of improving the existing housing stock. 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.	Lynne Hastings
JPA 20.15	Many people cannot afford to purchase their own homes. Councils should step in rather than letting locals sell off Green Belt land.	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. 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	Lynne Hastings

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		distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes are considered necessary.	
JPA 20.16	This plan is pandering to planners and developers and will not benefit the local community	Local authorities have a statutory duty to produce a development plan. The Introduction to the plan sets out how the plan is expected to benefit the nine districts and its residents. Particularly relevant is the commitment to delivering inclusive growth and good places.	Lynne Hastings
JPA 20.17	Comment regarding potential and need for affordable homes.	See response in line JPA20.15	Greater Manchester Housing Providers
JPA 20.18	General concerns regarding access to and from the site	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. It is considered that the transport evidence in Chapter 10 of the Topic Paper is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.	Michael Watts
	Green Belt		
JPA 20.19	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.	Tracy Raftery
JPA 20.20	Too much Green Belt is being proposed for release across Rochdale. There should be no building on Green Belt land of any kind.	See response in line JPA20.19. 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	Helen Lloyd-Higham Paul Roebuck Heywood, Middleton and Rochdale Conservative Cllr's Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups

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		distribution is set out in the Growth and Spatial Options Paper [02.01.10] . No changes are considered necessary.	Karen Lever
JPA 20.21	Brownfield sites need to be prioritised for development first before any Green Belt is released.	This is a brownfield site albeit some of the allocation is within the Green Belt. 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] . No changes are considered necessary.	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 20.22	It does not matter that this land is brownfield. It is still Green Belt land and should not be developed.	See response in line JPA20.21	Helen Lloyd-Higham Tina Chester Tracy Raftery Marc O'Driscoll
JPA 20.23	There are other options in Rochdale instead of further destruction to the Green Belt and local areas of beauty	See response in line JPA20.21	Marc O'Driscoll
	Access and Transport		
JPA 20.24	Some concerns raised regarding the effects additional housing will have on surrounding infrastructure.	In terms 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 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.	Sandra Pickering Helen Lloyd-Higham Tina Chester
JPA 20.25	Building in these locations will not enhance (access to) employment opportunities	A key element of the Strategy [JP-Strat 6] within the plan is to boost the competitiveness of the north of the conurbation, including Rochdale. This will be achieved through the delivery of the North East Growth Corridor [JP-Strat 7] which will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix.	Lynne Hastings

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JPA 20.26	The train service and public transport links are currently inadequate and in need of improvement.	The Council does not have powers to enhance rail services but is working with and lobbying rail operators and TfGM for capacity improvements to Calder Valley Line rail services. In 2020 Northern introduced more modern rolling stock with greater capacity than previous rail vehicles operating passenger services on the line. 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	Sharron Hibbert
JPA 20.27	The infrastructure in this area is already congested. It cannot cope with increased traffic from the proposed housing.	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.	Janine Lawford
JPA 20.28	The development of houses and any new infrastructure will result in disruption.	This is generally a matter to be dealt with via planning conditions. Paragraph 12.5 of the PfE plan notes the importance of co-operation between developers and infrastructure providers to avoid disruption.	Sandra Pickering Helen Lloyd-Higham Janine Lawford Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.29	The development should not conflict with the heritage railway line.	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.	Sandra Pickering
JPA 20.30	Partington Street is so narrow with vehicles on both sides and it is a one way street	This is noted and recognised in the Castleton Sidings Allocation Topic Paper 10.06.36 paragraph 10.7 page 13 and will be considered in the planning application process via the preparation of the Transport Assessment / Statement in line with (PfE Policies JP-C4, JP-C5 and JP-C7, pages 208-214).	Michael Watts
JPA 20.31	Concerns regarding parking issues including yellow lines, the width of the street and local congestion on the roads	See response in line JPA20.30	Michael Watts

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JPA 20.32	Concerns regarding access for emergency transport as roads are not accessible.	See response in line JPA20.30	Michael Watts
JPA 20.33	There is a dangerous corner on Fairway that cars can only fit through and people have to walk on the road.	See response to JPA20 30	Michael Watts
JPA 20.34	Concerns regarding how building wagons are going to deliver there building goods during the day.	See response to JPA20 30	Michael Watts
JPA 20.35	Concerns regarding Heywood Road and the additional traffic going past this park affecting the park area	See response to JPA20 30	Michael Watts
JPA 20.36	This plan does not take into the equation the impact on the existing one way system which is already bad enough	See response to JPA20 30	Sandra Pickering Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.37	The allocation is proposed to be accessed from two new accesses on Fairway. Whilst this will create one-way circulation it does not address the significant concern in relation to likely increase in traffic and traffic movements resultant from the development and the associated impacts on the wider network in terms of congestion and highway safety etc. This would be exacerbated by the scale of growth	See response to JPA20 30	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.38	People will continue to make short trips via private vehicle and this has not been addressed within this proposed allocation.	A number of policies within the Plan and criteria within JP Allocation 20 promote active travel improvements to encourage more short journeys to be made on foot or by bike. More specifically Criterion 7 of policy JP Allocation 20 requires the provision of good quality pedestrian and cycling routes through the site to facilitate safe and convenient links to the centre of Castleton and the Castleton Bee Network scheme, the nearby railway station, and westwards to employment locations around Heywood;	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.39	Whilst within walking distance of Castleton Railway Station the site is not sustainably located in relation to access to wider public transport links and local services and facilities to a degree that we do not agree with the conclusion in the Topic Paper at paragraph	As well as close proximity to Castleton railway station, Manchester Road, which runs immediately to the north of the site, is a high frequency bus route. The site is adjacent to Castleton centre which contains a number of local services and facilities. As a result the site meets Criterion 1 of the Site Selection process which relates to	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups

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	10.7 that the ease of access means the potential traffic impacts on the existing network will be moderate.	sites which are previously developed land as well as the most sustainable and accessible locations which are already well served by public transport.	
JPA 20.40	Developer supports the allocation of the site and the role it will play in the delivery of housing and the ELR line extension	Support is noted	Kellen Homes
JPA 20.41	The location and topography reduce the likelihood of active travel targets being met. Thus, opportunities for emissions reduction are ignored.	See response in line JPA20.38 in terms of active travel. Policy JP-S 6 of the plan sets out a comprehensive range of measures to support improvements in air quality. Section 21 of Castleton Sidings Allocation Topic Paper 10.06.36 considers the issue of air quality	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 20.42	The air quality levels in this area are already above the recommended limit. Any development, and the associated increased traffic, will increase these levels making the problem much worse.	See response in line JPA20.41	Vicky Harper Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
	Infrastructure		
JPA 20.43	Development will impact on local services such as hospitals and doctors which are already overstretched and insufficient assurances have been provided to address concerns in relation to accessing these services in the future.	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.	Heywood, Middleton and Rochdale Conservative Cllr's Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.44	This is a sustainable location but the impact on local services needs to be addressed. Local services such as doctors, dentists and schools are over- subscribed with long wait times to get appointments and a shortfall in school places.	See response in line JPA 20.43	Sandra Pickering
JPA 20.45	A better use for this site would be to provide leisure facilities for local people	Policy JP Allocation 20 identifies this as a housing site and is considered to be a sustainable site to meet the housing needs of the plan. The issue of new leisure facilities within the area would be more appropriately addressed through the Council's own Local Plan. No change is necessary.	Sandra Pickering

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JPA 20.46	The village centre is rundown and needs regenerating.	Paragraph 11.221 if the supporting text to policy JP Allocation 20 states that development of the site is important to facilitate the extension of the East Lancashire Railway (ELR) from Heywood to Castleton and this will assist in the wider regeneration of Castleton local centre. In addition there are further local strategies and planning guidance that support the regeneration of the wider area.	Sandra Pickering Andrew Drummond Sue Jagger
JPA 20.47	There are not enough local leisure facilities for residents to use.	See response in line JPA.20.43 The issue of new leisure facilities within the area would be more appropriately addressed through the Council's own Local Plan.	Sandra Pickering
JPA 20.48	Development will result in additional pressures on local school provision and insufficient assurances have been provided to address concerns in relation to accessing places in the future.	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 and therefore this development, along with other new residential schemes, will be expected to contribute to the provision of a new school to ensure that the demand for new school places created by the additional homes can be met. Criterion 12 of the policy requires contributions to ensure that there are sufficient school places to accommodate the new housing.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.49	Find a good entrance and exit to this site, for example make a bridge over the railway lines coming out on to Manchester Road.	See response to JPA20.30. A bridge over the railway to access this allocation is prohibitively expensive and time consuming to get the necessary permissions.	Michael Watts
JPA 20.50	Reference should also be made to the emerging Castleton Station SPD and the role the ELR line extension is expected to have as a catalyst for regeneration in the station area.	See response in line 20.46. The Draft Castleton Station Area SPD was produced once the draft PfE plan was completed therefore was not referenced. The Draft SPD references this allocation and supports the wider regeneration of the area which is complemented through the redevelopment of the Castleton Sidings site.	Kellen Homes
	Environmental		
JPA 20.51	Minerals and safeguarding not shown in the plan	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association

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JPA 20.52	The proposed development will be detrimental to the biodiversity and wildlife on this site, including the wildflowers and birds.	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 also set requirements for landscaping and green infrastructure that would help to support ecology and biodiversity in 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.	Tina Chester Vicky Harper
JPA 20.53	Green spaces help towards keeping the air clean. Therefore the loss of this Green Belt will contribute to further air pollution and contradicts Greater Manchester's clean air objectives.	This is a brownfield site. Criterion 2 of policy JP Allocation 20 notes that part of the site will be redeveloped as an area of open space or nature conservation area. Policy JP-S 6 of the plan sets out a comprehensive range of measures to support improvements in air quality. Section 21 of Castleton Sidings Allocation Topic Paper 10.06.36 considers the issue of air quality	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.54	The loss of more green space will increase light and noise pollution.	This is a brownfield site and therefore there is no loss of green space.	Heywood, Middleton and Rochdale Conservative Cllr's Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.55	Please provide details of how you have considered the impact of this development on the carbon footprint. Will the houses be built in accordance with the PfE energy and carbon reduction policies?	Policy JP-S2 of the plan sets out a strategic approach with the aim of delivering a carbon neutral Greater Manchester no later than 2038. New houses must meet current requirements in terms of energy efficiency.	Helen Lloyd-Higham Paul Roebuck Heywood, Middleton and Rochdale Conservative Cllr's

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JPA 20.56	Address the risk of surface water flooding that affects part of the site through an appropriate sustainable drainage strategy. Development proposals will be required to ensure that SuDS are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options	Policy JP-S5 of the plan sets out the overall approach to managing flood risk. Section 11 of the Castleton Sidings Allocation Topic Paper 10.06.36 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.	United Utilities Group PLC
JPA 20.57	Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved.	See response in line JPA20.52	United Utilities Group PLC
JPA 20.58	Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards.	Noted. See response in line JPA20.56	United Utilities Group PLC
JPA 20.59	There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided	See response in line JPA20.56. A number of these issues are more appropriately dealt with at planning application stage.	United Utilities Group PLC
JPA 20.60	Recommend the following additional criteria to this policy. New dwellings will be required to at least meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Any proposal must have full regard to the existing utility infrastructure that passes through the site. Early dialogue will be required with	As this relates to the application of national standards and detail infrastructure matters it is best dealt with at planning application/detailed masterplanning stage.	United Utilities Group PLC

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	United Utilities to understand the implications of this infrastructure on the detailed design and layout including changes in site levels. Consideration and inclusion of appropriate protective measures both during construction and during the lifetime of the development will be required.		
JPA 2.61	The allocation would result in the loss of Green Belt and green infrastructure. 2. Whilst Policy subtext 11.222 states that the redevelopment of the site as a whole does offer the opportunity to create a high-quality area of open space or an area for nature conservation on the western part of the site, there are currently no specific on how this will be achieved or where the current biodiversity interest or ecological features would lie in relation to the development type proposed	The allocation would result in some loss of Green Belt. However, it is a brownfield site and although it has revegetated in part there are opportunities to deliver green and blue infrastructure and areas of biodiversity value as required by criteria 2 and 11 of policy JP Allocation 20. The details of this will be addressed through subsequent masterplanning of 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. This policy also set requirements for a net gain in biodiversity.	The Wildlife Trusts
JPA 20.62	Also consider "the western part of the site will be redeveloped as an area of open space OR nature conservation area" (our emphasis) is unnecessarily binary unless nature conservation and open space use are specifically incompatible at this location.	This criteria in the policy seeks to provide some flexibility in the treatment of this part of the site. It does not preclude the delivery of both if that contributes to a well-designed and comprehensive scheme.	The Wildlife Trusts
JPA 20.63	Open space use and nature conservation use are not necessarily incompatible, depending on the particular sensitivities of the specific habitats or species which are to be conserved, expanded and enhanced. The wording would be preferable as "the western part of the site will be redeveloped as an area integrating nature conservation and public access, unless there are areas of demonstrable incompatibility".	See response in line JPA20.62. The current wording is considered to be sound and no changes are necessary.	The Wildlife Trusts
JPA 20.64	There needs to be a greater emphasis on the provision of ecological corridors to maintain links and connections with the wider environment. BNG gains need to be identified and this can only be achieved through detailed surveys and descriptions of the current biodiversity interest	Paragraph 18.4 of the Castleton Sidings Allocation Topic Paper 10.06.36 identifies a number of additional ecological surveys that would be required on the site. The finding of these would inform future detailed masterplanning on the site.	The Wildlife Trusts

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JPA 20.65	GMEU's ecological appraisal identifies the possibility of bats, Common Lizard (a UK Priority Species) and badgers. The report also highlights the presence of species rich grasslands and broadleaved woodland. These ecological features need to be protected	See response in line JPA20.64	The Wildlife Trusts
JPA 20.66	The effects of the development on the adjacent Rochdale Canal will also need to be considered	Section 18 of the Castleton Sidings Allocation Topic Paper 10.06.36 set out matters in respect of ecology and biodiversity. This notes that 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.	The Wildlife Trusts
JPA 20.67	It is noted that the site has potential to be used by bats, common lizards and badgers and has the potential (if not already doing) to support priority habitat types or priority species including broadleaved woodland and species-rich grassland.	See response in line JPA20.64	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20.68	There are no known heritage assets on site, however there are a number in the wider local area including views to and from St Martins Church, Castleton Conservation Area and the setting of lock 53, the towpath bridge and the United Reform Church	Paragraph 11.222 of the supporting text states that given the proximity of the site to the adjacent Heritage Assets, specifically: St Martins Church, Castleton South Conservation Area, Lock 52, Towpath Bridge and the United Reform Church, new development will respond positively to preserve and enhance their setting, retain key views to and from the assets and ensure the new development avoids being overly dominant. These issues would need to be addressed to achieve excellent design and sustainability as required in criterion 4 of the policy.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 20. 69	The local green spaces have been a real asset, particularly through lockdown. It would be devastating to lose local green spaces, especially for future generations.	This is a brownfield site in private ownership with no public access	Sue Jagger
JPA 20.70	Building on the flood plain adjacent to the rivers, is not a good ideas as the levels have increased over the years.	See response in line JPA20.56	Lynne Hastings
JPA 20.71	The lack of clarity on flood risk and drainage is unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed along with the concerns	See response in line JPA20.56	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups

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	on surface water flooding given the significant increase in hard standing on site.		Sharron Hibbert Vicky Harper
JPA 20.72	Criteria 11 – Have undertaken intrusive ground investigations, which confirm the site is contaminated and that infiltration is not appropriate. The drainage strategy will need to be designed accordingly and SuDs features will not be appropriate due to the risk of spreading contamination around the site. The reference to blue infrastructure should be removed accordingly.	See response in line JPA10. If further investigations show that the provision of blue infrastructure is not a appropriate then this can be addressed at that time and would not prevent the delivery of a high quality scheme.	Kellen Homes
JPA 20.73	The identification of this site delivering 125 dwellings does not make the most of this previous developed site. The net area is 5.08 hectares, and 125 dwellings equates to a net density of just 24.6 dph. This is significantly below the 50 dph set out in Policy JP-H for areas within 800 metres of rail stations with a frequent service and even below the minimum density set in the policy of 35 dph.	The capacity was based on information provided by the site promoter and related to evidence they had in terms of capacity. Criterion 1 of policy JP Allocation 20 says that the site should deliver <i>around</i> 125 dwellings. The evidence produced to date relates to that capacity. However, the policy would not preclude a different capacity on the site provided that all the criteria of the policy were met and it was supported by a robust evidence base.	Kellen Homes
JPA 20.74	The site should be increased accordingly. At 50 dph this would equate to 254 dwellings. Based on the detailed layout produced by Kellen Homes we considered that the density is likely to be closer to 40 dph, which would equate to 203 dwellings.	See response in line JPA20.73	Kellen Homes
JPA 20.75	No objection to the western end of the site being left underdeveloped and used for public open space. However, this is not “half” the site and the policy wording should be amended accordingly. As public open space, this area will form a functional part of the housing site and so we question whether this should be retained as Green Belt land, which could cause confusion when the detail of a scheme is being considered. Alternatively, we consider the allocation could include a criteria that limits the use of this area to public open space / ecological enhancements.	The reference to ‘half’ is more a descriptive phrase to describe the location of the area being referred to. Whilst it is considered that alternative wording may improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change is proposed. As set out in line JPA20.9, the approach in the plan has been based on limiting the extent of Green Belt release. The intention of the policy is that this land be kept open and therefore it is appropriate that it is retained as Green Belt. The masterplan in Appendix 3 pf Castleton Sidings Allocation Topic Paper 10.06.36 illustrates that this should not cause problems in delivering a scheme on the site.	Kellen Homes
JPA 20.76	Criteria 3 and 5, Paragraph 11.221 – It should be made clear that this site is required to deliver the ELR line extension, regardless of what option is pursued. This is true for not only the temporary	It is considered that the wording at present is appropriate and is reflected in the masterplan Appendix 3 pf Castleton Sidings Allocation Topic Paper 10.06.36 . No change is considered necessary.	Kellen Homes

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	halt, but also the new route of the line to the main line station on the opposite side of Manchester Road.		
JPA 20.77	Criteria 7 – to our knowledge, a link to Heywood through the site is not possible. We would welcome clarification of how the Council consider this could be achieved?	The Stage 2 GM Green Belt Study – Beneficial Use – Appendix E – Rochdale 07.01.17 notes that the opportunity exists to improve east-west pedestrian connections from Heywood to Castleton. Criterion 7 of the policy requires links through the site that would enable wider linkages to be achieved.	Kellen Homes
JPA 20.78	This criteria should be reworded. Pedestrian links will be provided within the site to the proposed access points. Thereafter, the existing links are strong, and if shown to be necessary, could be improved through planning obligations.	It is considered that the current wording is appropriate and no change is necessary	Kellen Homes
	Other		
JPA 20.79	This policy fails to meet many of the ten objectives within the Places for Everyone framework rendering it totally inappropriate and completely unjustified	While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the allocation of the site is supported by an appropriate evidence base which addresses matters such as those in the representation. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with the objectives of the PfE plan	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 20.80	Consultation is now outdated and ought to be repeated, many of those directly affected were unable to take part and make their voices heard when it was initially conducted. It took place prior to Brexit and prior to the pandemic. Need and demand has changed and those factors must be taken into consideration.	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement 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] .	Heywood, Middleton and Rochdale Conservative Cllr's

PfE 2021 Policy JP Allocation 21 – Crimble Mill

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle / Scale of Development		
Policy JPA21.1	Modification sought to the policy / supporting text to acknowledge the potential of the land to the west to come forward independently, so long as proposals do not prejudice the provision of a secondary access to Mutual Street.	Criterion 4 of the policy requires co-ordinated masterplanning to deliver a comprehensive scheme. Therefore, whilst the site may come forward in phases and via separate planning applications it is important that the link back to an overall comprehensive approach to development is maintained.	Mutual Mills Limited
Policy JPA21.2	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	See Appendix.
Policy JPA21.3	The Mill development should be split from the greenfield development and/or come forward in advance of greenfield development, and reassessed with access restricted to the lane to the north.	See response in JPA21.3	Anthony Pockney Claire Johnson Mike Ripley
Policy JPA21.4	The proposals do not comply with the PfE Objectives.	While the plan needs to be read as a whole, and individual planning applications will be considered against policies in the Plan and other local plan policies adopted at the time of the determination, the allocation of the site is supported by an appropriate evidence base which addresses matters such as those in the representation. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with the objectives of the PfE plan.	See Appendix.
Policy JPA21.5	Proposals do not take into account the impact of Brexit or the effects of the pandemic which have both influenced population numbers.	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] .	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA21.6	The allocation is lacking in detail on the mill development.	Detailed work on the mill development will be based on further masterplanning and informed by the Crimble Mill Historic Environment Assessment 2020 as set	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	
Policy JPA21.7	Preparatory work has already been undertaken on the site as part of the planning application - this should not have taken place.	Landowners are allowed to undertake appropriate investigative work on their land.	Nigel Morrell (Wolstenholme Fold Farm) Emma Joesbury
Policy JPA21.8	The allocation boundary should be amended to include Crimble Lane.	The allocation boundary does include Crimble Lane as it runs through the site. Any subsequent planning application may include Crimble Lane to the junction with the A58 subject to what land is required to achieve the access requirements agreed with the Council. Therefore, no change is considered necessary.	Rebecca Hilton (Lichfields)
Policy JPA21.9	The reasoned justification of the policy should make clear that there may be a requirement for the first phase of development to be on land to the south in order to facilitate / fund works to the Mill (including a replacement bridge).	See response in line JPA21.1. However, it should be noted that whilst other development may be appropriate as part of an early phase it should be linked to the mill itself as an early phase of the development as set out in Paragraph 11.227 of the supporting text.	Rebecca Hilton (Lichfields)
	Housing (inc affordable housing)		
Policy JPA21.10	Concerns over impact of development on the amenity of local residents including privacy, noise and light pollution and air quality.	Section 22 of the Crimble Mill Allocation Topic Paper 10.06.37 addresses the issue of noise in relation to the development. 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. PfE policy JP-S 6 sets out a comprehensive range of measures to support improvements in air quality across the plan as a whole. Policy JP Allocation 20 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.	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.11	Executive homes are not needed in the area - area needs affordable, social, eco housing.	<p>The Strategy set out within the plan seeks to boost the competitiveness of the north of the conurbation, including Rochdale.</p> <p>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> <p>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.</p>	See Appendix.
Policy JPA21.12	The development is unnecessary given lack of local housing need / housing need should be reassessed using up to date ONS figures.	<p>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 through the release of Green Belt.</p> <p>The distribution of development is based on achieving the Strategy set out in the PfE plan as evidenced in the Growth and Spatial Options Topic Paper 02.01.10 and Housing Topic Paper 06.01.03 which includes boosting the competitiveness of the north of the conurbation</p> <p>The methodology and calculation of the Local Housing Need is set out in the Housing Topic Paper 06.01.03.</p>	See Appendix.
Policy JPA21.13	The building of new homes may decrease the value of existing local homes.	This is not a planning consideration.	Steven Fieldhouse Alison Fieldhouse Gary Fieldhouse
Policy JPA21.14	The use of Design Codes is not essential and the policy wording should be amended to encourage but not enforce.	Criterion 4 of the policy requires proposed development to achieve excellent design and sustainability. The design codes reflect the latest Government guidance on achieving high quality design. Therefore, no change is necessary.	Rebecca Hilton (Lichfields)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Employment and Economy		
Policy JPA21.15	Area has high level of unemployment which the development will not help to improve.	A key element of the Strategy [JP-Strat 6] within the plan is to boost the competitiveness of the north of the conurbation, including Rochdale. This will be achieved through the delivery of the North East Growth Corridor [JP-Strat 7] which will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix.	Tracy Doyle
Policy JPA21.16	A loss of Green Belt will detract from the overall attractiveness of the area resulting in less visitors and a reduced local economy.	The issue of landscape is addressed in section 17 of the Crimble Mill Allocation Topic Paper 10.06.37 which says that any proposed layout will take into account the green infrastructure and heritage characteristics to produce a high quality layout which preserves and enhances the setting of the restored mill. Criteria 2, 3, 4, 5 and 9 the policy relates to landscape and heritage and means that further masterplanning of this site will ensure that any perceived impact on the surrounding landscape is minimised. The allocations policy also includes criterion relating to creation of accessible green space, the delivery of good quality walking and cycling routes, new and improved access to the adjacent Queens Park and creation of a route adjacent to the River Roch to support the wider Roch Valley Way. It is not considered that the proposal will result in a deterioration of visitors and reduced local economy.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA21.17	Building on this site will not enhance employment opportunities	See response in line JPA21.15	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Crimble Mill Greenbelt Group Irene Peachey
	Green Belt		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.18	Allocation will result in the unrestricted sprawl of large built-up areas contrary to Green Belt policy.	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.	Sam Pilling Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Paul Johnson Alison Fieldhouse
Policy JPA21.19	Object to the loss of Green Belt land - exceptional circumstances do not exist.	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.	See Appendix.
Policy JPA21.20	There should be greater transparency in the site selection process.	Section 5 of the Crimble Mill Allocation Topic Paper 10.06.37 sets out the Site Selection process for this site. This site meets criterion 5 as it will improve housing choice in Heywood and contribute to the regeneration of the area, and criterion 7 as it provides the opportunity to provide significant overall improvements to the listed mill complex in order to secure the long term future of a nationally significant Listed Building.	Irene Peachey
Policy JPA21.21	Land south of Crimble Lane (i.e. the existing Mill) should be removed from the Green Belt to ensure consistency across the allocated site. This part of the site is brownfield and contributes very little to the purposes of the Green Belt.	Given the Green Belt designation in this location it is considered that the River Roch provides a more defensible Green Belt boundary in the longer term and therefore better satisfies the requirement in NPPF. Given the site and the guidance in NPPF in terms of brownfield sites in the Green Belt it is not considered that this would restrict the delivery of a high quality scheme.	Rebecca Hilton (Lichfields)
	Brownfield		
Policy JPA21.22	Brownfield (other) sites should be developed first.	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	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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 Crimble Mill Allocation Topic Paper 10.06.37 .	
Policy JPA21.23	Density on existing brownfield sites should be increased before green belt land is released.	See response in line JPA21.22	Helen Fearon
	Transport		
Policy JPA21.24	Development of the site will result in existing local roads becoming congested and parking difficult for residents and the school.	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.	See Appendix.
Policy JPA21.25	Existing transport networks cannot cope with additional demand and there will be a cumulative negative effect on local highway safety as a result.	See response in line JPA21.24	See Appendix.
Policy JPA21.26	Site is not located nearby to train, tram or road network.	Section 10 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with transport matters relating to this site, including proposed mitigations. Paragraph 10.6 notes that the site has good access to a high frequency bus route along the A58. Further sustainable transport measures may be identified through the Transport Assessment required as part of the planning process in line with PfE Policies JP-C 3, JP-C 4, JP-C 5 and JP-C7.	See Appendix.
Policy JPA21.27	Proposals will result in an increase in traffic congestion and in turn emissions / air / noise pollution.	Policy JP-S 6 of the plan sets out a comprehensive range of measures to support improvements in air quality. Section 21 of Crimble Mill Allocation Topic Paper 10.06.35 considers the issue of air quality in relation to this allocation. Criterion 8 of the policy requires the development to deliver appropriate access to electric vehicle charging infrastructure and cycle storage. Both of these will have a positive impact on reducing air pollution.	See Appendix.
Policy JPA21.28	Proposals should be LTN 1/20 compliant.	PfE Policies JP-C 4 and JP-C 5 set out the Streets for All and Walking / Cycling policies which the design specifications of proposals will be expected to have regard to. This will include measures being LTN 1/20 compliant where possible,	Andrew Drummond

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		along with compliance with other advice notes, guidance and legislation on the design and safety of walking and cycling infrastructure. These issues will be addressed through the Planning Application and associated Transport Assessment / Statement process.	
Policy JPA21.29	Area does not have sufficient active travel infrastructure.	See response to JPA21 28	Andrew Drummond
Policy JPA21.30	Area has poor existing public transport links	See response to JPA21 26	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Steven Fieldhouse Paul Arden Karen Towriss Paul Towriss Alison Fieldhouse Gary Fieldhouse
Policy JPA21.31	The existing access to the site is extremely poor - it is too narrow and impossible for larger vehicles.	Section 10 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with transport matters relating to this site, including proposed mitigations. This includes a preferred two access solution for the development via Mutual Street as well as Crimble Lane. It is expected that any large vehicles will use the former route, which is already used by vehicles serving existing development. If any measures are required to limit the use of Crimble Lane, additional traffic restriction measures will be implemented through the Transport Statement / Assessment process.	See Appendix.
Policy JPA21.32	Suitable vehicular access across the river is not provided as part of the scheme - resulting in questions over the deliverability of the brownfield portion of the site (Crimble Mill)	Section 10 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with transport matters relating to this site, including proposed mitigations. As part of the planning application process for the allocation, the Transport Assessment / Statement will be required to demonstrate suitable vehicular access to and within the site.	Ian Warrington Lucy Johnson Michael Peachey Irene Peachey Paul Johnson

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.33	The existing bridge is unsuitable for traffic and is a required emergency access for local residents.	Section 10 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with transport matters relating to this site, including proposed mitigations. As part of the planning application process for the allocation, the Transport Assessment / Statement will be required to demonstrate suitable vehicular access. In addition to this an emergency access is proposed via Mutual Street and off Harold Lees Road.	See Appendix.
Policy JPA21.34	For completeness, the policy should refer to a secondary access from Mutual Street and/or Woodland Road. Mutual Street is not an option for the emerging planning application.	See response to JPA21 31.	Rebecca Hilton (Lichfields)
	Physical Infrastructure and Utilities		
Policy JPA21.35	Assurances need to be given prior to allocation that the local utility infrastructure can accommodate the scale of development proposed.	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. Section 13 of the Crimble Mill Allocation Topic Paper 10.06.37 provides further details on utilities.	See Appendix.
Policy JPA21.36	There are existing mines and a fault line in the area and the site may be subject to subsidence / potential for tremors from construction.	Section 12 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with matters relating to ground conditions.	See Appendix.
Policy JPA21.37	Waste and refuse collections in the area will be negatively affected and are already stretched.	All new developments in the borough will be served via the Council's waste collection service. 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. The Plan needs to be read as a whole, therefore no change is considered necessary.	Michael Peachey Irene Peachey Carole Heed Anthony Heed Debra Makin
	Social Infrastructure		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.38	Area does not have enough facilities/services with capacity to accommodate demand from new development.	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.	See Appendix.
Policy JPA21.39	Proposals need to contribute to any local capacity issues within education or health / care facilities.	See response in line JPA21.38 Criterion 10 of the allocations policy requires that any proposal should provide land adjacent to the existing school to allow for the expansion of the school to accommodate the additional demand for places. Financial contributions will also be required to ensure provision of primary and secondary schools places to serve the development. As noted in paragraph 23.2 of the Crimble Mill Allocation Topic Paper 10.06.37 secondary School provision within the borough is being enhanced through the delivery of two new secondary schools which have recently been awarded Government funding. These schools will open within the next three years and will assist significantly in meeting the need for secondary school places across the borough as a whole.	See Appendix.
Policy JPA21.40	The proposed development will negatively impact on the children at the nearby school due to noise and air pollution and highway safety	Section 22 of the Crimble Mill Allocation Topic Paper 10.06.37 addresses the issue of noise in relation to the development. 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. The allocations policy includes a number of criteria relating to the delivery of good quality walking and cycling routes and provision for charging electric	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		vehicles. These, along with the public transport connectivity of the site, will contribute to reducing emissions. All highways will be required to meet the requisite design and safety standards.	
Policy JPA21.41	Access to local services is poor.	See response in line JPA21.38	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Karen Towriss Paul Towriss
	Environmental		
Policy JPA21.42	The policy text should be amended to reflect that retention of hedgerows on land south of the Mill is unlikely to be feasible.	The policy does not make specific reference to hedgerows. Sections 15 and 18 the Crimble Mill Allocation Topic Paper 10.06.37 identify the value of hedgerows in the scheme. Paragraph 15.2 notes that the Delivery Framework submitted by the site promoter notes the importance of hedgerows. Therefore, these should be retained where possible as part of the high quality green and blue infrastructure required in criterion 5 of policy JP Allocation 21.	Rebecca Hilton (Lichfields)
Policy JPA21.43	Proposals will lead to a deterioration in the quality of life for local residents.	See response in line JPA21.38 The allocations policy includes a number of criterion relating to creation of accessible green space, the delivery of good quality walking and cycling routes, new and improved access to the adjacent Queens Park and creation of a route adjacent to the River Roch to support the wider Roch Valley Way. As noted in paragraph 15.4 of the Crimble Mill Allocation Topic Paper 10.06.37 the development of a high quality green infrastructure network can also assist in providing safe and attractive links to from the site to the town centre, the adjoining Queens Park and the wider river valley. This has the potential to create better connections from the urban area, promoting active recreation and healthy lifestyles.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Steven Fieldhouse Irene Peachey

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.44	Object to the loss of popular accessible local green space / play area for kids / recreational management area - important for mental and physical health.	See response in line JPA21.38 The allocations policy includes a number of criterion relating to creation of accessible green space, the delivery of good quality walking and cycling routes, new and improved access to the adjacent Queens Park and creation of a route adjacent to the River Roch to support the wider Roch Valley Way. As noted in paragraph 15.4 of the Crimble Mill Allocation Topic Paper 10.06.37 the development of a high quality green infrastructure network can also assist in providing safe and attractive links to from the site to the town centre, the adjoining Queens Park and the wider river valley. This has the potential to create better connections from the urban area, promoting active recreation and healthy lifestyles.	See Appendix.
Policy JPA21.45	Established habitats for wildlife will be destroyed and wildlife will be lost or displaced to the detriment of the local environment.	Sections 18 of the Crimble Mill Allocation Topic Paper 10.06.37 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.	See Appendix.
Policy JPA21.46	Proposals fail to take into account the presence of Himalayan Balsam / Japanese Knotweed on the site.	This is a detailed matter that would need to be addressed at planning application stage.	Mike Ripley
Policy JPA21.47	Proposals do not address climate change.	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.	Sam Pilling (Heywood, Middleton and Rochdale Conservative Cllr's) Claire Johnson Steven Fieldhouse Mike Ripley Paul Towriss Gary Fieldhouse

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.48	Proposals will lead to increased level of carbon release.	PfE carries climate change as a key theme throughout the plan and contains a series of thematic policies which focus on this area. PfE policy JP-S 2 sets out measures that support the aim of delivering a carbon neutral Greater Manchester by 2038 and that new development will be net zero carbon from 2028.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA21.49	There will be a significant effect on local landscape character as a result of the proposals damaging local amenity value - hedgerows should be protected.	The issue of landscape is addressed in section 17 of the Crimble Mill Allocation Topic Paper 10.06.37 which says that any proposed layout will take into account the green infrastructure and heritage characteristics to produce a high quality layout which preserves and enhances the setting of the restored mill. Criteria 2, 3, 4, 5 and 9 the policy relates to landscape and heritage and means that further masterplanning of this site will ensure that any perceived impact on the surrounding landscape is minimised.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Irene Peachey Halina Clowes Carole Heed Anthony Heed Debra Makin
Policy JPA21.50	The proposals increase environmental damage and contribute to climate change.	See response in line JPA21.47.	See Appendix.
Policy JPA21.51	Historic use of the site may give rise to potential site contamination and the need for significant remediation.	Section 12 of the Crimble Mill Allocation Topic Paper 10.06.37 provides details on ground conditions, including a summary of a desk based review of the site undertaken by the Council's Public Protection Service. The main issue found relates to the previous use of the land on parts of the site which means that an intrusive investigation is likely to 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 or are adjacent to sites that have had an industrial use.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Irene Peachey
Policy JPA21.52	The map for the allocation should be updated to show Minerals Safeguarding Areas.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA21.53	Unacceptable impact on Plumpton Wood SBI and Meadowcroft Woods SBI - should be excluded from the allocation or protected.	Both Plumpton Wood SBI and Meadowcroft Wood SBI are located outside of the allocation boundary. PfE policy JP-G 9 sets out requirements regarding the protection of sites of biological value and seeks a net gain in biodiversity. The Local Plan also contains policies dealing with the protection of SBI's.	CPRE The Wildlife Trusts
Policy JPA21.54	Any green infrastructure on the site should adhere to 10% Biodiversity Net Gain requirements.	PfE policy JP-G 9 sets out the requirements regarding the net enhancement of biodiversity and geodiversity including a measurable net gain in biodiversity of no less than 10%.	The Wildlife Trusts
Policy JPA21.55	Full breeding bird surveys should be carried out alongside other specified ecology surveys.	Sections 18 of the 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.	The Wildlife Trusts
	Flood Risk and Drainage		
Policy JPA21.56	Object to building on flood plain - proposals will increase drainage and flooding problems downstream as well as making properties difficult to insure.	<p>Policy JP-S5 of the plan sets out the overall approach to managing flood risk.</p> <p>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.</p> <p>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.</p>	See Appendix.
Policy JPA21.57	SuD's should be fully incorporated into the development considering topography, flow paths and low lying areas. Landscaping proposals will be expected to be integrated with the strategy. Natural and multi-	See response in line JPA21.56.	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	functional SuDs should be utilised and designed in accordance with design standards.		
Policy JPA21.58	There should be a clear allocation wide strategy for foul and surface water management recognising the phases of development and no surface water discharging to the public sewers. New dwellings should meet national standards for water consumption.	See response in line JPA21.56.	United Utilities Group PLC
	Heritage		
Policy JPA21.59	Additional development around the mill will likely result in harm to the setting of the designated heritage asset.	Section 20 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with issues relating heritage. It provides details of the Heritage Impact Assessment completed for the site and a summary of the recommendations provided to ensure the significance of the historic built and natural environment can be preserved or enhanced.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Irene Peachey Anthony Heed
Policy JPA21.60	The policy text should be adapted so that archaeological trial trenching is not a pre-application requirement owing to evidence base work already undertaken.	Section 20 of the Crimble Mill Allocation Topic Paper 10.06.37 deals with issues relating heritage. It provides details of the Heritage Impact Assessment completed for the site and a summary of the recommendations provided to ensure the significance of the historic built and natural environment can be preserved or enhanced. No change is considered necessary	Rebecca Hilton (Lichfields)
	Other		
Policy JPA21.61	Questions over the private-ownership of the site and links between the developer and Council.	The site is in private ownership. The only link with the Council relates to discussions that would be expected in relation to a proposed allocation.	Iain Brown Linsey Rawlinson Steven Fieldhouse Paul Arden Michael Peachey Tracy Raftery Gary Fieldhouse
Policy JPA21.62	Local residents should be compensated if access via bridge is impaired.	There is no intention to impair access via the bridge within the site in line with PfE Policy JP-C 4 and JP-C 5.	Linsey Rawlinson
Policy JPA21.63	Resist the loss of existing PROW.	Criterion 9 of policy JP Allocation 20 states that the development will be required to retain and enhance existing rights of way and general access through and around the site.	Anthony Pockney Steven Fieldhouse Karen Towriss

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>The allocations policy also includes criteria relating to the creation of accessible green space, the delivery of good quality walking and cycling routes, new and improved access to the adjacent Queens Park and creation of a route adjacent to the River Roch to support the wider Roch Valley Way.</p> <p>As noted in paragraph 15.4 of the Crimble Mill Allocation Topic Paper 10.06.37 the development of a high quality green infrastructure network can also assist in providing safe and attractive links to from the site to the town centre, the adjoining Queens Park and the wider river valley. This has the potential to create better connections from the urban area, promoting active recreation and healthy lifestyles.</p>	Irene Peachey Gary Fieldhouse
Policy JPA21.64	The plans contradict paragraph 100 of the NPPF and the existing PROW should not be used as an access due to highway safety issues.	<p>See response in line JPA21.63</p> <p>There will be a legal requirement to make safe passage and provision to accommodate use by existing users in line with paragraph 100 of NPPF as well as PfE Policies JP-C 4 and JP-C 5.</p>	Rochdale and Bury Bridleways Association Linsey Rawlinson Steven Fieldhouse
Policy JPA21.65	A new access road should be provided to the development, avoiding the existing PROW.	See response to JPA21 64.	Rochdale and Bury Bridleways Association
Policy JPA21.66	An alternative route to the PROW should be provided in line with Defra guidance.	See response to JPA 21 64.	Rochdale and Bury Bridleways Association
Policy JPA21.67	Concerns regarding the consultation process (PfE and planning application)	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement.	See Appendix.
Policy JPA21.68	A viability clause should be added to the policy to make clear that a pragmatic approach to developer contributions will be adopted to ensure that a viable scheme can be brought forward. Given the site specific complexity, viability should be considered at planning application stage.	<p>Section 25 of the Crimble Mill Allocation Topic Paper 10.06.37 summarises the assessment of viability.</p> <p>Policy JP-D2 of the PfE plan deals with developer contributions, including matters relating to viability. Therefore, it is not considered necessary to add a clause to the policy and no change is necessary.</p>	Rebecca Hilton (Lichfields)

PfE 2021 Policy JP Allocation 22 – Land North of Smithy Bridge

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Loss of Green Belt		
JP22.1	Loss of Green Belt will mean settlements will merge together.	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.	Smithy Bridge & Littleborough Save the Green Belt Group Anne McNally Jacqueline Barber
JP22.2	The scale of the development needs reducing.	As set out in the conclusion in section 30 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 this site seeks to deliver a high quality scheme 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.	Jeremy May Leanne Backer
JP22.3	Rochdale is already meeting its adopted housing target and therefore does not need to release any Green Belt land.	As set out in Table A5 on page 404, the policy relating to the housing target in the Core Strategy will be replaced by policy JP-H1 of the PfE plan. 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.	See Appendix.
JP22.4	This proposal does not take account of national legislation or policy. Exceptional circumstances have not been demonstrated to remove 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.	See Appendix

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	
JP22.5	The reduction in Green Belt land does not take account of this being accessible land which can be enjoyed by the public.	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.	Heywood, Middleton and Rochdale Conservative Cllr's Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JP22.6	There is no justification to release Green Belt land for development. Do not build on Green Belt.	See response in line JPA22.4	Brian Chicot Andrew Patker Anne McNally Tracy Raftery Marc O'Driscoll
JP22.7	There are many available brownfield sites which should be developed before any Green Belt land is released.	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	See Appendix
JP22.8	Many people cannot afford to purchase their own homes. Councils should step in rather than letting locals sell off Green Belt land.	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. See response in line JPA22.4 in terms of justification for limited Green Belt release.	Lynne Hastings

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.	Concerns regarding this development will lead to an influx of development in and around the area on farmland and greenfield sites	See response in line JPA22.4 in terms of justification for limited Green Belt release. The PfE plan does not propose the release of further Green Belt land than that currently identifies in the plan.	Dave and Jill Greenwood
	Housing		
JP22.9	The proposed housing does not meet local needs. It does not include much needed affordable or older persons housing.	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. See response in line JPA22.8 regarding affordable housing.	Amanda Parker Andrew Patker Barry Hazell-Scott Barbara Hazell-Scott
JP22.10	Local people will not be able to afford the proposed housing and will need to move out of the area.	See response in line JPA22.8 regarding affordable housing.	Angela Clegg
JP22.11	The development of this site and loss of the car park will have a detrimental impact the tourism of this area, which will have a significant impact on the local economy such as local businesses who rely on the tourism the lake draws in.	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.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups James Aylmer-Shanks Anne McNally Jacqueline Barber
JP22.12	Densities should be increased on brownfield sites	See response in line JPA22.7	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.13	Rochdale is not short of housing supply	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	Margaret Booley Sarah Berry Violet Davies

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	
JP22.14	Concerns regarding providing more sustainable housing	The criteria within the allocation policy seek to deliver a high quality scheme which is in a sustainable location between two railway stations and within walking distance of Littleborough Town Centre. Policy JP-P1 of the plan sets out an approach which aims to deliver sustainable places across the plan area.	Anthony Tattersall
JP22.15	To the northeast of the site lies the former Akzo Nobel site, which has planning permission pending for 169 homes. This development should be acknowledged within this allocation as the 2 sites will be side-by-side.	Criterion 4 of the policy requires any proposal to incorporate a design and layout which complements the existing housing to the west of the site and the proposed new housing on the former Akzo Nobel site to the north;	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.16	More investment should be made in the local housing stock including grants for home insulation, roof repair, brickwork and retrofitting heat and electrics.	Paragraph 7.11 of the PfE plan sets out the importance of improving the existing housing stock. 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.	Lynne Hastings
JP22.17	Luxury housing is not needed in the area	See response in line JPA22.9	Michael Keeley Andrew Patker Barry Hazell-Scott Barbara Hazell-Scott Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group
JP22.18	Comment regarding potential and need for affordable homes	See response in line JPA22.8	Greater Manchester Housing Providers

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.19	No mention of the rural economy in the plan	The plan should be read as a whole and JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that these parts of the nine districts will contribute significantly to economic growth. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play, including in terms of the economy. The Council has a policy within its Local Plan which considers the rural economy and this policy will continue to apply once PfE is adopted.	Violet Davies
JP22.20	The proximity of this site to the former Akzo Nobel site also raises concerns over contamination. The (21/01146/FUL) indicates credible contaminants on the site, however the topic paper does not consider the high level of asbestos identified on the neighbouring Akzo Nobel site (21/01146/FUL, Site Investigation Review document: carried out by E&P). Any development on this allocation would require proper screening for asbestos and other contaminants	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.	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.21	Further detail on the safety of the site (in relation to ground conditions) should be provided before the allocation could be considered viable and justifiable.	See response in line JPA22.20	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.22	Remove Smithy Bridge from PfE	See response in line JPA22.4	See Appendix
JP22.23	An increase in housing will increase local crime rates	Development plans, such as PfE, need to set out how they will meet the need for additional housing across the plan area. Policies JP-S 4 and JP-P 1 of the plan both make reference to the need for designing out crime to deliver resilient and sustainable places. In addition, the Council requires all developments of this size to submit a Crime Impact Assessment alongside any planning application.	Jenny Walker
JP22.24	Comment confirming capacity to deliver housing in the area.	Comment relating to capacity to deliver housing in the area is noted	Homes England

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.25	This plan is pandering to planners and developers and will not benefit the local community	Local authorities have a statutory duty to produce a development plan. The Introduction to the plan sets out how the plan is expected to benefit the nine districts and its residents. Particularly relevant is the commitment to delivering inclusive growth and good places.	Lynne Hastings
	Transport		
JP22.26	The traffic will increase noise pollution	It is not considered that the increase in traffic from the development would lead to a significant increase in noise pollution. 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 Land north of Smithy Bridge Allocation Topic Paper 10.06.38 addresses the issue of noise in relation to the development.	Julie Leonard
JP22.27	There is no evidence of any traffic survey being carried out to assess the impact of the new housing on the roads and no solution to the increased traffic resulting from the proposed housing.	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.	Victoria Turner
JP22.28	The local train service is inadequate and overcrowded. It will not cope with increased demand from new houses.	The Council does not have powers to enhance rail services but is working with and lobbying rail operators and TfGM for capacity improvements to Calder Valley Line rail services. In 2020 Northern introduced more modern rolling stock with greater capacity than previous rail vehicles operating passenger services on the line. 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	Wardle and West Littleborough Conservative Cllrs Heywood, Middleton and Rochdale Conservative Cllr's Leanne Backer
JP22.29	There are no suitable public transport links to the nearest Metrolink stop.	The allocation is located within acceptable walking distance of Littleborough and Smithy Bridge Railway Stations. The Land north of	Brian Taylor Leanne Backer

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	Amanda Parker Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall
JP22.30	The site is not accessible to the Metrolink	See response to JP22 29.	Aaron Jones Victoria Turner Susan Bishop Smithy Bridge & Littleborough Save the Green Belt Group Jacqueline Barber
JP22.31	Brownfield sites next to transport hubs should be increased	This site is not Green Belt. 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.	Violet Davies
JP22.32	There is a lack of infrastructure to support the local area	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.	Margaret Booley Jenny Walker Vicky Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.33	There is no bus route to Smithy Bridge/Milnrow	See response to JP22 29.	Jenny Walker
JP22.34	The traffic modelling used to assess the impact of this site on the highway network is based on the GMVDM which relies on a SATURN model (which is a strategic transport model). The traffic flows within this model are not appropriate for local junction assessments without demonstrating that there is a high level of validation and calibration achieved within the area. The information provided does not include the evidence to assess this at a local level. This should be requested to demonstrate that the evidence base is sound.	<p>A proportionate transport evidence base, using the best available data, has been provided to inform the allocations policies. The methodology used to prepare the traffic evidence for each allocation is contained in the introduction of the Transport Locality Assessments [09.01.07 through to 09.01.29] and further technical explanation of the modelling can be found in the Strategic Modelling Technical Note – Places for Everyone 2021 [09.01.04]. Regarding the use of the GMVDM/SATURN model, a review of the network coding was undertaken in the vicinity of each of the allocations and, where necessary, coding improvements were made to better reflect the actual network situation.</p> <p>The best available data was used from the Strategic Model to represent a robust “policy-off/worst-case” scenario. It was considered impractical to carry out further traffic counts to undertake more detailed local model calibration while the impact of COVID had dramatically changed the patterns of traffic on the network. This approach reflects the strategic nature of the plan. It is recognised that more detailed assessments will be required later in the planning process. These would need to more accurately reflect the pattern of traffic on the highways at the time of the planning application and develop final, rather than indicative, proposals which mitigate the impact of the site.</p>	Caroline Aylmer-Shanks
JP22.35	Locality Assessment refers to an 'A58 Residential Relief Road' as a supporting strategic intervention but it is unclear whether this has been included within the traffic modelling.	As noted in the comment the A58 Residential Relief Road is identified as a supporting strategic intervention. The business case has still to be developed and the scheme does not yet have formal approval so has not been included in the modelling at this stage.	Caroline Aylmer-Shanks
JP22.36	Section 15.2 - List of Final Interventions of the Locality Assessment refers to an 'A58 Residential Relief Road' as a supporting strategic	See response in line JP22.35.	Caroline Aylmer-Shanks

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	intervention but it is unclear whether this has been included within the traffic modelling. This intervention would have a significant impact on traffic distribution within the area and would in particular impact the operation of the Wildhouse Lane / Smithy Bridge Road junction and the Halifax Road / Smithy Bridge Road junction. This should be clarified in order to assess the evidence base properly. The same section of the Locality Assessment also includes for a '300 space visitor car park to replace existing car park lost to development' within the list of 'Necessary Local Mitigations' but no reference is made as to where this could be provided and the impact that this would have on traffic flows.	The location of the visitor car park has also still to be formally approved but will not provide any increase in the number of spaces. The impact of this change on the local transport network will be addressed through the planning process within an appropriate Transport Assessment / Statement.	
JP22.37	Section 15.2.1 of the Locality Assessment (Necessary Local Mitigations) also includes an acceptance that 'It may be difficult to locate the signal heads for the signalisation of the A58 / B6225 Hollingworth Road junction due to the railway bridge'. I question whether this meets the definition of being positively prepared as it does not make provision for the infrastructure that it determines are needed.	The difficulty in locating signal heads at A58 / B6225 / Hollingworth Road junction is raised as an issue to be addressed. This issue will be overcome and a positive solution will be sought in the detailed design of any necessary mitigations.	Caroline Aylmer-Shanks
JP22.38	The present road system would not be able to cope with the increase in traffic	See response in line JPA22.27	Dave and Jill Greenwood
JP22.39	Increase the green and leisure space generally across the area, and develop low emission modes of transport including cycle ways and walkways particularly to rivers, canals and reservoirs.	The allocations policy includes a number of criteria relating to creation of accessible green space, 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.	Anthony Tattersall
JP22.40	Welcome positive references to the adjoining Rochdale Canal and to development being required to create high quality, safe and convenient walking and cycling routes and improved linkages to local destinations including the canal.	Support is noted.	Canal & River Trust
JP22.41	Paragraph 11.231 refers to access between Littleborough and Smithy Bridge being significantly improved through "the creation of new routes within this development and the adjoining housing site to the north The Rochdale Canal towpath has the potential to provide a safe, off-road	Whilst it is considered that this proposed wording could be added to the reasoned justification to the policy, it is not considered to be a soundness issue, therefore no change is proposed.	Canal & River Trust

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	walking route to Smithy Bridge and Littleborough. Suggest that the final sentence of this paragraph 11.231 could usefully be expanded to refer to “the creation of new or improvements and access to existing routes within and adjacent to the development where possible “		
JP22.42	Repeat previous advice given in respect of this site that any masterplan or development should have full regard to all potential constraints which include the need to ensure no adverse impact on the stability of the adjoining canal cutting and regard to the feeder channel linking Hollingworth Lake and the Rochdale Canal which runs roughly parallel to Hollingworth Road, approximately 140m into the site.	These are matters that are more appropriately dealt with at planning applications with any mitigations required conditioned accordingly.	Canal & River Trust
	Heritage		
JP22.43	There is historical evidence to suggest the Smithy Bridge policy is on the site of a Roman Road and artifacts found indicate a Roman settlement was established adjacent to it	Criterion 6 of the allocation policy and paragraph 11.233 of the reasoned justification sets out requirements in respect of archaeology on the site. This requirement is evidenced through the findings of the North of Smithy Bridge Historic Environment Assessment 10.06.19	Wardle and West Littleborough Conservative Cllrs
	Social Infrastructure		
JP22.44	Local services are already overstretched. Doctors, dentists and hospitals are all oversubscribed with long wait times for appointments.	See response in line JPA22.32	See Appendix
JP22.45	Local primary and secondary schools are oversubscribed with a shortfall in places and local children unable to secure places.	See response in line JPA22.32 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 to meet demand arising from the new development. 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 the delivery of two new secondary schools which have recently been awarded Government funding. One of these schools is proposed in Littleborough and is due to open within the next three years.	See Appendix.

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		This will assist significantly in meeting the need for secondary school places in this area and across the borough as a whole.	
JP22.46	Hollingworth Lake is busy already with traffic and cars	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.	David Hill Janine Lawford Leanne Backer Dave and Jill Greenwood
JP22.47	The site is a working cattle and poultry farm. It is unjustifiable to develop this site.	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.	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.48	The site is not consistent with national policy.	No change is considered necessary. Policy JPA22 is considered to be consistent with NPPF and provides an appropriate strategy to delivering homes in a sustainable location which is a key objective of the plan and NPPF.	See Appendix.
JP22.49	The Village feel in the area will be lost	Policy JP-P1 of the plan sets out an approach which aims to deliver sustainable places across the plan area. This policy contains a number of criteria aimed at creating and protecting distinctiveness across the plan area.	Margaret Booley
	Environmental Issues and Flood Risk		
JP22.50	The sewer, drainage and water systems are already in need of urgent renovation and upgrading.	See response in line JPA22.32. Paragraph 12.14 of the supporting text to policy JP-D2 of the plan references the delivery of water and waste water infrastructure to support new development.	Margaret Booley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.51	The carbon emissions created by the increased traffic will significantly increase air pollution in the area. This will be detrimental to people's health.	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.	Victoria Turner Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Jennifer Barlow Amanda Parker Smithy Bridge & Littleborough Save the Green Belt Group
JP22.52	Flooding is a significant issue for this area. Areas of Littleborough regularly flood and this development will only make this 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.	See Appendix.
JP22.53	Land either side of Dye House Lane, Rochdale is derelict and unloved, improvements here would be a better option	This site is already included in the baseline supply with the expectation that it will deliver new homes over the plan period.	Joanne Coffey
JP22.54	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	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 which is a designated National and European site in close proximity to this allocation.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.55	Concerns regarding risk of contaminants	See response in line JPA22.20	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JP22.56	Disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
JP22.57	The land that is proposed is an old quarry and mining site. Land searches will not allow mortgages on mined land. Evaluation of land and location of mineshaft needs more investigation to avoid disasters.	See response in line JPA22.20	Michael Keeley
JP22.58	The site may disturb ground water and cause other issues.	See responses in line JPA22.20 regarding ground conditions and response in line JPA22.52 in terms of flood risk and drainage.	Smithy Bridge & Littleborough Save the Green Belt Group
JP22.59	What is the response to the mitigation of future climate change concerns. The plan does not address this.	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.	See Appendix.
JP22.60	Building on the flood plain adjacent to the rivers, is not a good ideas as the levels have increased over the years.	See response in line JPA22.52	Lynne Hastings
	Consultation Process		
JP22.61	Concerns regarding post pandemic changes	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] .	Aaron Jones

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.62	The consultation process is outdated	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement	Wardle and West Littleborough Conservative Cllrs
JP22.63	More consultation is needed with the local community	See response in line JPA22.62	Graham Roberts Smithy Bridge & Littleborough Save the Green Belt Group
	Modifications and Recommendations		
JP22.64	Minor changes to the wording of the supporting text could improve the clarity and effectiveness of the policy.	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.	Canal & River Trust
JP22.65	Objection. Understood that the site has received investment via Countryside Stewardship and development may harm gains to biodiversity	Whilst the sites may have received investment, this would not preclude the site from being allocated for development. Section 18 of the Land north of Smithy Bridge Allocation Topic Paper 10.06.38 sets out matters in respect of ecology and biodiversity. This concludes that currently there are no known ecological constraints which are so important as to preclude the allocation of the site, but ecological mitigation and compensation will likely be needed to avoid harm to important habitats and species.	CPRE
JP22.66	The Ecology Technical Note indicates that the site mainly comprises horse and cattle grazed grassland, with some areas of marshy grassland. The report also indicated that no protected or priority species data has been requested or received from the local records centre and that this data should be obtained to help inform required surveys and potential impacts on species. The Trust is in full agreement with this statement.	Noted	The Wildlife Trusts
JP22.67	The ecology report further indicates that the site has the potential to support populations of wintering birds including waders using the lake and pond adjacent to site, as well as the species for which the South	Noted	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Pennines SPA is designated. As such, wintering bird surveys and breeding bird surveys will be required at the site to inform any necessary mitigation. Again, the Trust is in full agreement with this statement		
JP22.68	A quick interrogation of Natural England's Magic Map indicates that the site and the immediate area has been identified as a Countryside Stewardship targeting area for Lapwing, Redshank and Snipe and as an area for upland breeding birds as well as grassland assemblages of farmland birds. Farmland birds identified include; Curlew, Grey Partridge, Lapwing, Redshank, Snipe and Twite. Clearly the site has a huge potential to support important assemblages of S41 bird species. These S41 species are a material consideration within planning decisions. If the site is shown to support these species, mitigation/compensation plans must be provided to show how they are either to be incorporated into the development or identify off-site areas for compensation and how these are to be managed to enhance the area to protect the populations of these S41 species. If the site is shown to support these species and the development cannot provide for them within the development area, then off-site areas need to be identified where appropriate management can be undertaken to ensure the maintenance of the breeding population. To fully understand the level of impact both full breeding bird surveys and winter bird surveys should be carried out along with surveys of potential compensation areas to demonstrate that displacement is possible into the wider landscape.	See response in line JPA22.65 in terms of ecology	The Wildlife Trusts
JP22.69	The Vision document within the supplementary information provided indicates that any required mitigation can be accommodated within the extensive green infrastructure (GI) proposals within the site. The development design seeks to retain and enhance those features of highest ecological value, including the pond, dry stone walls and	Criterion 2 of policy JP Allocation 22 requires the delivery of a landscaped development which maximises its Pennine fringe setting and takes account of views from and into the site, including the incorporation of high quality green and blue infrastructure. Requirements in terms of green infrastructure will develop through further masterplanning.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	hedgerows. Anticipated losses of any trees would be mitigated through the planting of native trees and shrubs within the site, and any risks to retained habitats (and the adjacent Rochdale Canal) would be controlled through the implementation of a Construction Environmental Management Plan	See response in line JPA22.54 regarding requirement relating to the canal.	
JP22.70	The Vision document further states that 'In terms of opportunities, the GI provision will provide an important corridor for species moving through the site between Hollingworth Lake and Rochdale Canal. Other opportunities include the: enhancement / management of the pond for GCN (if present) and floating water plantain; provision of hedgehog-friendly fencing as well as bat, barn owl and bird boxes within the new development; and enhancement of boundary trees and hedgerows – these are aspirations which tie in with those described in the 'Biodiversity and Development SPD	See response in line JPA22.65 in terms of ecology and JPA22.69 in terms of Green Infrastructure.	The Wildlife Trusts
JP22.71	The Trust would add that in terms of BNG the allocation must follow the mitigation hierarchy of avoid - mitigate – compensate and the development must show at least a 10% biodiversity net gain. All retained and newly created habitats must provide fully functioning ecologically connected corridors that link into the wider ecological network. As stated above, if the site is shown to be important for farmland birds then large areas of open and undisturbed grassland will need to be retained/created as part of the mitigation plan.	Policy JP-G9 of the plan sets out requirements in respect of biodiversity net gain See response in line JPA22.65 in terms of ecology and JPA22.69 in terms of Green Infrastructure.	The Wildlife Trusts
JP22.72	The Trust notes that Natural England's Magic Map also indicates that an area in the southern part of the site is currently within a woodland grant scheme and this might alter mitigation plans for this woodland area.	See response in line JPA22.69	The Wildlife Trusts
JP22.73	Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options. Applicants should	See response in line JPA22.52	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable drainage and flood resilient solution is achieved.		
JP22.74	Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards. There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer.	See response in line JPA22.52	United Utilities Group PLC
JP22.75	A proliferation of pumping stations should be avoided; New dwellings will be required to at least meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Any proposal must have full regard to the existing utility infrastructure that passes through the site. Early dialogue will be required with United Utilities to understand the implications of this infrastructure on the detailed design and layout including changes in site levels.	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.	United Utilities Group PLC
JP22.76	Consideration and inclusion of appropriate protective measures both during construction and during the lifetime of the development will be required. Any proposal must also have full regard to the proximity to Hollingworth Lake. Early dialogue will be required with United Utilities to understand the implications of the proximity to the Lake so that any requirements can be fully reflected in the design and masterplanning process. This should include full consideration of access arrangements to the Lake and its associated embankments.	Noted. These will be addressed as part of further masterplanning and through the planning application process.	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JP22.77	<p>General support for the scheme. In order to ensure the overall delivery of the proposed scheme, including the provision of the replacement visitor car park, a suggestion that the boundary of PfE Policy JP Allocation 22 should be amended to include land at Rakewood Road, where the replacement visitor car park is proposed. Such an amendment will ensure the comprehensive delivery of the overall scheme.</p>	<p>General support is noted. The location of the replacement visitor car park has still to be formally approved and therefore it is not appropriate to include potential locations at this stage.</p>	<p>Bloor Homes (North West) Ltd</p>

PfE 2021 Policy JP Allocation 23 – Newhey Quarry

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Scale of development		
Policy JPA23.1	The scale of development is too large. There is no need/demand for such a large quantity of homes in this area.	As set out in section 27 of the Newhey Quarry Allocation Topic Paper 10.6.39 the masterplanning of this site seeks to deliver a high quality scheme with a range of housing types. 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	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA23.2	Housing need in the Borough can be met without the loss of Green Belt land.	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 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	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Tracy Raftery
	Type of housing		
Policy JPA23.3	The amount of high end housing included in the proposal should be reconsidered. Affordable and social housing for younger generations is needed instead.	The Council has a policy within its Local Plan which requires the delivery of affordable homes. There is still a requirement for local authorities to provide sufficient housing to meet the needs of the plan area.	Irene Peachey Vicky Harper
Policy JPA23.4	Greater investment should be made into the local housing stock including grants for repairs before building new housing.	This is not a planning issue. There is still a requirement for local authorities to provide sufficient housing to meet the needs of the plan area.	Lynne Hastings
Policy JPA23.5	Many people cannot afford to purchase their own homes. Council's should step in rather than letting locals sell off Green Belt land.	The Council has a policy within its Local Plan which requires the delivery of affordable homes. There is still a requirement for local authorities to provide sufficient housing to meet the needs of the plan area.	Lynne Hastings
	Impact on tourism		
Policy JPA23.6	Proposals will result in a deterioration of the local tourism offer.	The site is in private ownership and has permission for mineral extraction. It is not considered that the proposal will result in a deterioration of the local tourism offer.	John Taylor (Heywood,

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Middleton and Rochdale Conservative Cllr's)
	Impact on the Green Belt		
Policy JPA23.7	The plan goes against Green Belt policy to keep in check the unrestricted sprawl of large built-up areas	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. Section 14 of the Newhey Quarry Allocation Topic Paper 10.6.39 sets out the assessment of Green Belt for this site and the exceptional circumstances that justify its release.	Paul Roebuck Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Policy JPA23.8	Green Belt should be protected not developed.	See response in line JPA23.7	Irene Peachey Vicky Harper Tracy Raftery
Policy JPA23.9	Building on Green Belt land will diminish the local economy rather than add to it.	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. The Strategy set out within the plan seeks to boost the competitiveness of the north of the conurbation, including Rochdale.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA23.10	Green Belt sites have inferior transport links when compared with the Town Centre or sites in close proximity to arterial routes and motorways. Building in these locations will not enhance employment opportunities or reduce the number of wards in the top ten list of deprivation.	Section 5 of the Newhey Quarry Allocation Topic Paper 10.6.39 sets out the Site Selection process for this site. This site meets criterion 1 as it is well served by public transport being with 800m of a Metrolink stop. The site is also located close to the motorway network.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA23.11	All brownfield sites in the Borough should be prioritised, developed first and should take precedence over Green-Belt and greenfield sites.	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 through the release of Green Belt.	Paul Roebuck John Taylor (Heywood, Middleton and

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Rochdale Conservative Cllr's Irene Peachey Lynne Hastings
	Transport impacts		
Policy JPA23.12	The existing road infrastructure will not be able accommodate increased traffic created from this new housing on both an individual and cumulative level. Transport evidence underpinning the allocation is incomplete and does not identify in sufficient detail the nature, scale and timing of infrastructure requirements.	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.	Janine Lawford Helena Drumm (Petition against Newhey Quarry – supported by 209 residents) Dean Larder Vicky Harper National Highways
Policy JPA23.13	Proposals will result in an increase in traffic / transport congestion – site is within an AQMA.	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. Section 21 of this Topic Paper deals with matters relating to Air Quality.	Paul Roebuck Ian Gerrard Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry – supported by 209 residents) Dean Larder RH and S Rothwell

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA23.14	Public transport is limited and cannot compare with existing infrastructure in the town centre.	See response in line JPA23.10	Paul Roebuck Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Policy JPA23.15	A motorway bypass should be created that avoids Newhey.	See response in line JPA23.13	Ian Gerrard Dean Larder
Policy JPA23.16	The existing site access is not designed to be heavily trafficked – its proximity to the primary school, local area and highway network in relation to increased traffic is of concern.	See response in line JPA.13	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry – supported by 209 residents)
Policy JPA23.17	Parking nearby the site is an issue and current problems should be addressed prior to building new homes.	The issue of local parking matters are addressed in Criterion 7 of the policy.	Helena Drumm (Petition against Newhey Quarry – supported by 209 residents)
	Impact on existing social infrastructure		
Policy JPA23.18	It is essential that assurances that the existing infrastructure can accommodate the scale of development proposed are provided prior to allocation.	The Newhey Quarry Allocation Topic Paper 10.6.39 covers a range of infrastructure issues and how these will be addressed.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Janine Lawford

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Helena Drumm (Petition against Newhey Quarry – supported by 209 residents) Vicky Harper
Policy JPA23.19	Opportunities for sustainable development close to existing infrastructure are being ignored.	See response in line JPA23.10 In addition, the allocation is located close to the village centre which offers a range of existing services/facilities.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA23.20	More local services and facilities are needed, as the existing facilities are over-subscribed, including hospitals, doctors, dentists and educational facilities. It is already very difficult to get appointments and school places.	See response in line JPA23.18	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry – supported by 209 residents) RH and S Rothwell
	Impact on the climate		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA23.21	The proposals do not sufficiently take climate change into account – proposals will result in increased emissions, congestion and air pollution.	The issue of climate change is dealt with strategically through the policies within the Sustainable and Resilient Places chapter of the PfE plan. The site was also subject to assessment as part of the Strategic Environmental Assessment within the Sustainability Appraisal. This assessment considered the policies in relation to climate indicators.	Paul Roebuck John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents) Vicky Harper
Policy JPA23.22	Proposals will result in increases in carbon release.	See response in line JPA23.21	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents)
	Impact on existing communities		
Policy JPA23.23	Proposals will negatively affect the quality of life of local residents.	The Newhey Quarry Allocation Topic Paper 10.6.39 deals with a range of issues relating to the quality of life for existing and future residents. This concludes that the allocation accords with relevant economic, social and environmental objectives.	John Taylor (Heywood, Middleton and Rochdale

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Conservative Cllr's Irene Peachey Dean Larder
Policy JPA23.24	Concerns regarding ground conditions and remediation works required to make the site safe for residential use given historic use of the site as a Quarry – more intensive assessments should be carried out in advance of allocating the site to fully understand deliverability and viability.	This issue is addressed within Section 12 of the Newhey Quarry Allocation Topic Paper 10.6.39 which deals with ground conditions.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents)
Policy JPA23.25	The need to reprofile and regrade the land is likely to result in air pollution, dust and noise to the detriment of neighbouring properties.	These issues would be controlled through conditions attached to any subsequent planning approval.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Policy JPA23.26	The Plan is pandering to planners and developers and will not benefit the local community.	Local authorities have a statutory duty to produce a development plan. The PfE plan is considered to be a sound plan that will deliver sustainable growth across the plan area.	Lynne Hastings
	Impact on existing natural habitats		

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
Policy JPA23.27	Newhey Quarry is an important site for a variety of wildlife (including endangered species), Their habitats will be at risk if it is developed and sufficient evidence has not been put forward.	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.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry – supported by 209 residents) Vicky Harper Tracy Raftery Lynne Hastings
Policy JPA23.28	The development will detrimentally affect the landscape designations associated with the site (Open Moorlands and Enclosed Upland Fringes) and be detrimental to landscape character and harm visual amenity.	The issue of landscape is addressed in section 17 of the Newhey Quarry Allocation Topic Paper 10.6.39 . Further masterplanning of this site will offer the opportunity to ensure that any perceived impact on the surrounding landscape is minimised.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Policy JPA23.29	A detailed mitigation plan showing how the identified key biodiversity features are to be protected and enhanced is needed.	Criteria 4 and 5 of the policy require measures to safeguard and enhance biodiversity. These would need to be addressed in more detailed masterplanning of the site.	The Wildlife Trusts
Policy JPA23.30	Ecological assessments undertaken in 2019 should be provided as part of the supplementary information to the allocation – concerns that the reprofiling of the cliff face could adversely affect	Section 18 of the Newhey Quarry Allocation Topic Paper 10.6.39 set out matters in respect of ecology and biodiversity.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	the sites biodiversity interest and survey information is needed.	Criterion 5 of the policy ensures that hat the re-profiled quarry face, which is to be retained in the Green Belt, takes the opportunity to incorporate biodiversity and attractive visual features to enhance the quality of the development.	
Policy JPA23.31	Green and blue infrastructure on the site should enhance ecological connectivity.	See sections 15 and 18 of the Newhey Quarry Allocation Topic Paper 10.6.39 set out matters in respect of green infrastructure and ecology and biodiversity.	The Wildlife Trusts
Policy JPA23.32	The proposed allocation would risk a significant narrowing of an identified Green Infrastructure corridor.	See response in line JPA23.31	CPRE
	Impact on flooding/drainage/water		
Policy JPA23.33	The impact of changes to land levels on surface water flows and the risk of flooding of adjacent properties on lower ground needs to be addressed.	Section 11 of the Newhey Quarry Allocation Topic Paper 10.6.39 deals with issues relating to flood risk and drainage.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents) Vicky Harper Lynne Hastings
Policy JPA23.34	Building on the flood plain adjacent to the rivers is not a good idea as levels have increased over the years.	See response in line JPA23.33	Lynne Hastings
Policy JPA23.35	SuDs should be fully incorporated into the development considering topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. This will be important given the steeply sloping nature of this site. Landscaping proposals will be	See response in line JPA23.33 Policy JP-S 5 of the PfE plan sets out the approach to sustainable drainage systems. Criterion 4 of the policy references the need to incorporate water features and paragraph 11.238 in the reasoned justification references blue infrastructure.	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	expected to be integrated with the strategy for surface water management.		
Policy JPA23.36	There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer.	See response in line JPA23.33	United Utilities Group PLC
Policy JPA23.37	Proposals should comply with the Environment Agency's approach to groundwater protection – this should be considered in the masterplanning, detailed design and construction phases of the development.	Noted	United Utilities Group PLC
Policy JPA23.38	Viability concerns given costs are understood to include transport but not ecological mitigation & flood risk etc. Confirmation is sought that the site remains viable.	Section 4.6 of the PfE Strategic Viability Assessment Stage 1 2020 Report 03.01.01 sets out the policy and mitigation costs that have been used in the assessment and this includes costs relating to biodiversity net gain and other Section 106 costs such as open space.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents)
	Impact on the existing use of the site		
Policy JPA23.39	The site is subject to an existing consent for mineral extraction not housing.	Noted. However, the need to release some Green Belt to meet housing need is set out within the PfE plan and this represents a sustainable site when considered against the site selection criteria. See Section 5 of the Newhey Quarry Allocation Topic Paper 10.6.39	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Mineral Products Association

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			CPRE
	Consultation concerns		
Policy JPA23.40	Concerns regarding consultation process and availability of information.	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helena Drumm (Petition against Newhey Quarry Development - supported by 209 residents) Irene Peachey

PfE 2021 Policy JP Allocation 24 – Roch Valley

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle of Development		
JPA 24.1	The proposed capacity is currently too high. It will be reduced at the next stage as a tactic to appease objectors.	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 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	Marc O'Driscoll
JPA 24.2	The development is too large and no more houses are needed.	See response in line JPA24.1	Marc O'Driscoll Margaret Booley Janine Lawford Jenny Walker
JPA 24.3	There is too much focus on homes which are not suitable for the area. The type of housing proposed does not meet the local need.	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.	Angela Clegg Lynne Hastings Greater Manchester Housing Providers Brian Taylor
JPA 24.4	The proposed development may harm the rural economy.	The plan should be read as a whole and JP-J1 establishes an appropriate policy framework to support the long-term economic growth based on the overall priorities established in the Local Industrial Strategy. It identifies key growth sectors, major assets and key growth locations. These do not include the rural economy as it is not envisaged that these parts of the nine districts will contribute significantly to	Smithy Bridge & Littleborough Save the Green Belt Group Heywood, Middleton and Rochdale Conservative Cllr's

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>economic growth. However, the Greener Chapter (chapter 7) does recognise the role that rural areas play, including in terms of the economy.</p> <p>The Council has a policy within its Local Plan which considers the rural economy and this policy will continue to apply once PfE is adopted.</p>	
JPA 24.5	Brownfield sites should be built on as a priority before Green Belt is used	<p>This site is not Green Belt.</p> <p>In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land 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.</p>	See appendix
JPA 24.6	The proposed development will detrimentally change the landscape at Smithy Bridge forever	<p>The issue of landscape is addressed in section 17 of the Roch Valley Allocation Topic Paper 10.06.40 . Criteria 4 and 5 of the policy means that further masterplanning of this site will ensure that any perceived impact on the surrounding landscape and its heritage is minimised.</p>	Angela Walker
JPA 24.7	Densities on existing brownfield sites close to transport hubs should be increased.	See response in line JPA24.5	Aaron Jones

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 24.8	The site does not comply with national policy or legislation. It is not consistent with sustainable development and the NPPF. The site is not justified, nor positively prepared.	See response in line JPA24.7	See appendix.
JPA 24.9	The additional housing and warehousing exceeds the governments predicted requirements of the area	The evidence relating to the assessment of needs for housing and warehousing across the plan area is set in the Housing Topic Paper 06.01.03 and the Employment Topic Paper 05.01.04 . 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.	Tracy Raftery
JPA 24.10	More investment should be made in the local housing stock including grants for home insulation, roof repair, brickwork and retrofitting heat and electrics	Paragraph 7.11 of the PfE plan sets out the importance of improving the existing housing stock. 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.	Lynne Hastings

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 24.11	Many people cannot afford to purchase their own homes. This plan is pandering to planners and developers and will not benefit the local community	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. Local authorities have a statutory duty to produce a development plan. The Introduction to the plan sets out how the plan is expected to benefit the nine districts and its residents. Particularly relevant is the commitment to delivering inclusive growth and good places.	Lynne Hastings
JPA 24.12	More housing will increase crime in the area	Development plans, such as PfE, need to set out how they will meet the need for additional housing across the plan area. Policies JP-S 4 and JP-P 1 of the plan both make reference to the need for designing out crime to deliver resilient and sustainable places. In addition, the Council requires all developments of this size to submit a Crime Impact Assessment alongside any planning application.	Jenny Walker
JPA 24.14	The recently vacated Wheatsheaf shopping centre provides a perfect example of a windfall site now presented for development. Historical data can be used to predict future windfall sites and they too ought to be factored into the numbers. Otherwise, we will end up with many derelict sites along with the destruction of our greenbelt and green field locations.	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. The current land supply is as set out in the Housing Topic Paper 06.01.03 and represents a robust assessment of the land available to deliver housing over the plan period.	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 24.15	It is noted that this site is not included within the strategic viability report (Stage 2 allocated sites visibility report, Oct 2020). The site is the subject of a live planning application (19/00881/FUL) and remains awaiting a decision despite a lack of robust evidence demonstrating the site is suitable to be developed.	As stated on page 20 of the Strategic Viability Assessment Stage 2 Report 03.01.04 the allocation is already within planning process and therefore excluded from viability assessment process. The planning application has yet to be decided and will be considered on the basis of the information provided in support of the application.	Smithy Bridge & Littleborough Save the Green Belt Group

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JPA 24.16	Undertake a comprehensive review of all brownfield sites in the Rochdale area and Rochdale town centre and provide more sustainable housing. Increase higher density and affordable housing, green and leisure space across the area and develop low emission modes of transport including cycle ways and walkways.	See response in line JPA24.5 in terms of brownfield sites. 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. The allocations policy includes a number of criteria relating to creation of accessible green space, 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.	Anthony Tattersall
JPA 24.17	Rochdale has enough brownfield sites to meet virtually all of its housing needs and more is likely to become available in the coming years. High density homes are already proposed in the Rail corridor strategy and these should be built before any local greenbelt is even considered for release.	See response in line JPA24.5 in terms of brownfield sites. The Rail Corridor Strategy (RCS) is an aspirational document which identifies potential housing opportunities close to the borough's railway stations. A number of sites identified within the Rail Corridor Strategy are included in the baseline supply. Those that are not included at present are because they are not considered to satisfy the requirements of NPPF for inclusion in the housing land supply.	Jacqueline Barber
JPA 24.18	Comment strongly supports the proposed allocation of the site for residential. The site presents an opportunity to create a sustainable, distinctive and attractive development which will help meet the established housing needs of the community. It is within reasonable walking and cycling distance, and well connected by public transport, to a range of services and facilities, as well as employment opportunities within Rochdale.	Support is noted.	Taylor Wimpey Strategic Land
JPA 24.19	The land west of Smithy Bridge Road / Roch Valley should be allocated for residential development. The site is located in a part of the Rochdale Borough where housing growth is directed under the adopted Rochdale Core Strategy. The site is within easy reach of Rochdale; which is the primary focus for new housing and economic development in the Borough, particularly through the North-East Growth Corridor.	Support is noted.	Taylor Wimpey Strategic Land
JPA 24.20	Contribution to Housing Supply the benefits of delivering high quality market housing cannot be underestimated. National	Support is noted.	Taylor Wimpey Strategic Land

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	planning policy and Government initiatives make clear the urgent need for more homes. The residential development of the site will provide new homes in Rochdale and will secure important economic benefits during both the construction and operational phases.		
JPA 24.21	The site is a suitable, deliverable and sustainable development opportunity which would comprise a logical extension to the urban area and make a notable contribution towards meeting identified needs for housing in the Borough. Proposed modifications are sought to ensure that the associated policy is sound	Support is noted.	Taylor Wimpey Strategic Land
JPA 24.22	Remove JA 24 from the plan	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] . No changes are considered necessary.	Susan Bishop David Hill Jennifer Barlow Edward Ahmad Angela Clegg
	Transport and Local Infrastructure		
JPA 24.23	This area already has a huge amount of traffic due to its close proximity to the tourist attraction of Hollingworth Lake and commuters	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.	Victoria Turner Jason Turner Leanne Backer Angela Clegg Anthony Tattersall

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JPA 24.24	The local road infrastructure will not be able to support the additional traffic resulting from this development. Roads are already congested at peak times. More traffic will cause problems.	See response in line JPA24.23.	See appendix
JPA 24.25	The level crossing is frequently down which disrupts traffic	See response in line JPA24.23.	Smithy Bridge & Littleborough Save the Green Belt G
JPA 24.26	Traffic caused by commuters creates long queues. There is congestion from the motorway and level crossing.	See response in line JPA24.23.	Victoria Turner Jason Turner
JPA 24.27	Emergency vehicles will struggle to get through when there is busy traffic.	See response in line JPA24.23.	David Hill
JPA 24.28	The train service is overcrowded and inadequate. The Metrolink service is also overcrowded for those who can access it.	The Council does not have powers to enhance rail services but is working with and lobbying rail operators and TfGM for capacity improvements to Calder Valley Line rail services. In 2020 Northern introduced more modern rolling stock with greater capacity than previous rail vehicles operating passenger services on the line. 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	Peter Nightingale Brian Taylor Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.29	There is no access to the Metro tram system, no direct bus link, and the local train stations struggle to meet rush hour demand, leading to many avoiding public transport.	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.	Victoria Turner Jason Turner Jean Markham
JPA 24.30	The site is not accessible to public transport to the Metro - 4km away, with no direct bus link	See response in line JPA24 29.	Leanne Backer
JPA 24.31	Concerns in relation to congestion, air pollution from vehicles and pedestrian safety already exist in this area. The housing is likely to attract commuters and therefore increase congestion	See response in line JPA24.23. 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.	Smithy Bridge & Littleborough Save the Green Belt Group

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		These, along with the public transport connectivity of the site, will contribute to reducing emissions.	
JPA 24.32	The Topic Paper indicates that the proposed allocation will not have a severe impact on the local network but that mitigating works will be required to ensure this. The proposed mitigation works are noted to be extensive and include the creation of new junctions, local junction improvements, provision of a toucan crossing and bus stop upgrades.	See response in line JPA24.23	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 24.33	The model results show that the Smithy Bridge Road / Wildhouse Lane junction operates over capacity. Mitigation was 'considered' at this location due to the performance of the junction. In table 8 it states that the results were comparable at this location? There is no evidence to explain what this means, but no mitigation is taken forward. Why has no mitigation been put forward at this location.	The traffic impact of other interventions proposed to support this allocation are identified in the Locality Assessment Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 GMA25 Section 15, Table 10 F33-F35. These are predicted keep traffic levels the same or reduce them at this junction as shown in Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 GMA25 Table 9, F31 compared with the reference case (Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 Table 7, F25-F26). Work will continue to find interventions at this junction to address the impacts of the traffic generated from the reference case.	James Aylmer-Shanks
JPA 24.34	There is no bus access to the Metrolink station in Milnrow and another housing development on Wildhouse Lane is being planned which will further add to the amount of traffic on these roads. In addition, Wildhouse Lane and the A58 are often used as a diversion route when the M62 is closed affecting air quality.	See response in line JPA24 29.	Jacqueline Barber
JPA 24.35	The "A58 residential relief road" is mentioned as a potential supporting measure. This route is also likely to be impact on Smithy Bridge Road but no evidence is provided. Do RBC have a supporting Transport Strategy to understand the impact on Smithy Bridge Road which is particular concern given it's proximity to Smithy Bridge Primary School and the sub-standard footways along Smithy Bridge Road between the Level Crossing and the Smithy Bridge Road / Wildhouse Lane mini-roundabout.	The A58 residential relief road proposal requires formal approval and a proven business case so has not been included in the modelling at this stage. Paragraph 15.1.2 (p. F34) of the Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 notes that the A58 Residential Relief Road offers benefits to the operation of the wider transport network in this part of the borough. This is also set out in the Roch Valley Allocation Topic Paper 10.06.40 paragraphs 10.4-10.5 page 13). Paragraph 10.3 of the Topic Paper includes a range of mitigations including improvements to the footway and Public Rights of Way network. These are supported by similar footway and Rights of Way improvements identified in section	James Aylmer-Shanks

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		10 of the Topic Paper. PfE Policies JP-C4 and JP-C5 propose principles that maximises the ability of pedestrians to navigate easily and safely and minimising barriers to their movement.	
JPA 24.36	Despite a nearby bus service, the provision is limited. There is a tram station over 3km away but there is no direct bus route from Littleborough or Smithy Bridge to the Milnrow tram station (Station Road, Milnrow). The train station of Smithy Bridge is nearby but the network is already at capacity at peak times	See response in line JPA24 29	Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.37	<p>Background information on the locations of count data used to calibrate and validate the GMVDM should be shared.</p> <p>The impact of the change in location of the lake car park should be considered in the assessment.</p> <p>RBC should consider the impact of the A58 residential relief road as part of the development of a transport strategy for the area.</p> <p>Further information should be provided to understand why mitigation is not provided at the Smithy Bridge Road / Wildhouse Lane mini-roundabout.</p>	<p>A proportionate transport evidence base, using the best available data, has been provided to inform the allocations policies. The methodology used to prepare the traffic evidence for each allocation is contained in the introduction of the Transport Locality Assessments [09.01.07 through to 09.01.29] and further technical explanation of the modelling can be found in the Strategic Modelling Technical Note – Places for Everyone 2021 [09.01.04]. Regarding the use of the GMVDM/SATURN model, a review of the network coding was undertaken in the vicinity of each of the allocations and, where necessary, coding improvements were made to better reflect the actual network situation.</p> <p>The best available data was used from the Strategic Model to represent a robust “policy-off/worst-case” scenario. It was considered impractical to carry out further traffic counts to undertake more detailed local model calibration while the impact of COVID had dramatically changed the patterns of traffic on the network. This approach reflects the strategic nature of the plan. It is recognised that more detailed assessments will be required later in the planning process. These would need to more accurately reflect the pattern of traffic on the highways at the time of the planning application and develop final, rather than indicative, proposals which mitigate the impact of the site.</p> <p>The change in location of Hollingworth Lake car park is a proposal and does not have approval. It is intended to be replacement facility, not additional. If approved,</p>	James Aylmer-Shanks

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		<p>the impacts of the change in location will be assessed as part of the Transport Assessment for the allocation.</p> <p>In relation to the A58 residential relief road comment, see response in line JPA24.36.</p>	
JPA 24.38	<p>Given the close proximity of the site to M62 Junction 21, the scale of allocation is likely to contribute to traffic impacts on both an individual and cumulative level at the SRN, particularly at M62 Junction 21 and along the M62 corridor.</p>	<p>An increase in trips is predicted to be generated by the allocation by 2040 at M62 J21. There are other PfE allocations which also generate additional trips at this junction. Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 Section 14.2 F32-F33 states that further work is required to understand the nature, scale and timing of infrastructure requirements on the SRN. With respect to future assessments, Transport Locality Assessments – Rochdale – GMSF 2020 09.01.12 paragraph 1.2.7 P4-5, notes that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM, and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in GM Transport Strategy 2040 09.01.01 and GM Transport Strategy Our Five Year Delivery Plan 2021-2026 09.01.02. We are also working alongside National 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>	National Highways
JPA 24.39	<p>The locality assessment has been undertaken using flows forecast from the GMVDM. Whilst this model is acceptable at a Greater Manchester level, the evidence supplied does not show how well the model is calibrated and validated for use in Rochdale or in Littleborough which is on the edge of Greater Manchester.</p>	See response in line JPA24.38	James Aylmer-Shanks

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	Further evidence should be provided to show that the GMVDM is fit for purpose.		
JPA 24.40	Densities on existing brownfield sites close to transport hubs should be increased. Littleborough has no infrastructure.	See response in line JPA24.14	Jenny Walker
JPA 24.41	The air quality will be negatively affected by the increase in traffic.	See response in line JPA24.31	See Appendix.
JPA 24.42	Pollution is a major concern in the area	See response in line JPA24.31 Section 21 of the Roch Valley Allocation Topic Paper 10.06.40 deals generally with matters relating to air quality. 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	Paul Roebuck Peter Nightingale Janine Lawford Jennifer Barlow
	Environmental Issues / Green Infrastructure		
JPA 24.43	Green spaces provide natural flood measures and alleviation. More houses will increase the issue.	Criteria 3 and 4 of the allocation policy include requirements relating to flood risk, including sustainable drainage measures and the delivery of green and blue infrastructure as part of a high quality scheme.	Aaron Jones Victoria Turner Jason Turner Jean Markham Anthony Tattersall
JPA 24.44	The plan does not address climate issues	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.	Marc O'Driscoll Jenny Walker
JPA 24.45	The development will destroy the natural beauty of the area.	Criterion 4 of the allocation policy requires any development to have regard to the river valley setting in terms of the design and layout, particularly in relation to the materials uses, the incorporation of green and blue infrastructure and the landscaping along the boundary of the site.	Angela Walker

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JPA 24.46	Green spaces are an important part of the area and are used for walking, cycling and other recreation activities that benefit people's health and wellbeing	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.	Margaret Booley
JPA 24.47	The development will have a detrimental impact on the wildlife and will decrease the levels of biodiversity.	Section 18 of the Roch Valley Allocation Topic Paper 10.06.40 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.	Jane Rothwell Peter Nightingale Janine Lawford Tracy Raftery
JPA 24.48	The impact of loss of green spaces will have a negative impact on climate change and the plan does not address this	See response in line JPA24.44	Marc O'Driscoll Angela Walker Jenny Walker
JPA 24.49	The development would not be sound as it would destroy leisure options for residents and visitors. The area borders the Clegg Village conservation area.	See response in line JPA24.46	Jean Markham
JPA 24.50	Although the GMEU ecological appraisal indicates that overall ecological constraints are limited, the report also indicates that further surveys are required so that mitigation and/or compensation may be required for some species. The topics paper also indicates that detailed Ecological Appraisal has been undertaken in support of the planning application, (the decision of which is pending) and that seeks to minimise the impact of any development on the nature conservation value of the area.	The information provided at the in support of the Publication PfE plan included a link to the planning application and supporting evidence that was on the Council's website [10.06.29]. Therefore this information was provided but it was not included in the supplementary information for the plan since it had been produced to inform the planning application and not the PfE allocation. The Ecological Appraisal in support of the application was produced by TEP and includes details of surveys and recommendations.	The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>2. Why have these ecological surveys/findings or recommendations not been provided as part of the supplementary information to inform the allocation plan?</p> <p>3. What species or habitats have been identified as being important and why?</p> <p>4. How are these to be protected?</p>		
JPA 24.51	<p>The site and area could be important for S41 bird species including; Lapwing, Redshank, Snipe, Curlew and Grey Partridge. The Maps also indicate that the area is important for its assemblages of farmland birds. It is acknowledged that the habitat might not be suitable for these species, but what survey data has been presented to evidence the use of the site by such species. Without this data it is very difficult to make representation on the allocation.</p>	<p>See response in lines JPA24.47 and JPA24.50 that address issues in terms ecology and biodiversity.</p>	The Wildlife Trusts
JPA 24.52	<p>The Trust also notes that the development will also reduce the width of identified GI east to west. The site allocation is situated within the GI opportunities area. The Trust Notes Policy 4 to “Have regard to the river valley setting in terms of the design and layout, particularly in relation to the materials uses, the incorporation of green and blue infrastructure and the landscaping along the boundary of the site”. However, there is not ecological strategy to maintain and enhance ecological networks in the area. This needs to be provided as part of a detailed mitigation plan. The Mitigation/ecology plan needs to show how any identified ecological feature is to be protected, retained or compensated for. HRA may also be needed for possible indirect recreational disturbance effects on the South Pennines SAC/S</p>	<p>See response in lines JPA24.47 and JPA24.50 that address issues in terms ecology and biodiversity.</p>	The Wildlife Trusts
JPA 24.53	<p>Objection. Concerns about the landscape and visual impact of development. Ecological issues need further assessment</p>	<p>See response in line JPA24.45 regarding Landscape. See response in lines JPA24.47 and JPA24.50 that address issues in terms ecology and biodiversity.</p>	CPRE

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JPA 24.54	There is no need to build in the Green Belt. Leave the Green Belt alone.	This site is not Green Belt 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] .	Kathryn Ames Lindsay Earnshaw Simon Robertson Anthony Tattersall
JPA 24.55	This does not meet exceptional circumstances criteria for Green Belt	This site is not in the Green Belt	Heywood, Middleton and Rochdale Conservative Cllr's David Hill Peter Nightingale Brian Taylor Sharon Lowe Leanne Backer Jenny Walker Anthony Tattersall
JPA 24.56	There is a loss of green space, non affordable or eco homes, habitat loss and lack of infrastructure	See response in line JPA24.46 regarding green space. See response in line JPA24.11 regarding affordable housing. See response in line JPA24.47 regarding biodiversity. In terms 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 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.	Vicky Harper
JPA 24.57	These greenbelt policies cannot provide sustainable infrastructure. Opportunities for sustainable development close to existing infrastructure are being ignored.	The site is not in the Green Belt. See response in line JPA24.5 regarding maximising brownfield sites. See response in line JPA24.56 regarding infrastructure.	Heywood, Middleton and Rochdale Conservative Cllr's
JPA 24.58	Mental health is important and good views and walking areas are diminishing around Littleborough.	The allocations policy includes a number of criteria relating to creation of accessible green space, the delivery of good quality walking and cycling routes.	Jane Rothwell

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		Policy JP-P 1 of the plan seeks to deliver sustainable places and environments that will contribute positively in terms of mental health.	
	Flood Risk and Ground Issues		
JPA 24.59	The site and surrounding area are on a flood plain. Any development will result in increased flooding in the area.	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.	See Appendix.
JPA 24.60	The current fields which are planned to be built upon, are vital for the absorption of surface water and slow down the run off of rainwater down hill where it joins the river. The building of houses and roads on these fields will reduce the surface water absorption and cause more rapid and increased water run off so that river levels will rise much higher and much more quickly.	See response in line JPA24.59	Victoria Turner Jason Turner
JPA 24.61	Any building on greenbelt/ greenfield land with Littleborough and Smithy Bridge could contribute to more instances of flooding. In 2015 Littleborough had significant flooding with many houses and shops under water.	See response in line JPA24.59	Angela Walker Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.62	The site is too close to the River Roch which is prone to flooding. Previous flood prevention measures in this area didn't work.	See response in line JPA24.59	Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.63	Flood risk in the area is a real issue. Developing houses in this area will exacerbate this.	See response in line JPA24.59	See Appendix.
JPA 24.64	No clarity is provided in relation to the scale of flood storage needed and where within this allocation this is to be located. The fact that the allocation is adjacent to an existing river and the areas on which it is situated currently provides important flood	See response in line JPA24.59	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups

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	storage capacity raises significant concern (1) as to whether the site is safe and suitable to accommodate the scale of development proposed and (2) the impact developing this site has on flood risk further downstream and within the wider local area		
JPA 24.65	Given that the southern portion of the site is noted to be within flood zone 3 with a high probability of flooding these issues are of even greater concern and as to whether the allocation is appropriate and justified, particularly as paragraph 11.3 of the Topic Paper considers that the site is only likely to pass the exception test but it cannot be demonstrated at this point that it actually will pass the exception test.	See response in line JPA24.59	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 24.66	The site houses an underground sewage tank. This was deemed not suitable by United Utilities 6 years. This work impacted the area greatly and the land was used as feed for the livestock. The tanks are accessed frequently by united utilities and large machinery used.	The sewage tank is in an area of the site that is not proposed for development. Access and other issues relating to this element of infrastructure would be considered at planning application stage.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 24.67	The site houses underground sewage tanks installed by United Utilities. Local residents report that the tanks are regularly attended by United Utilities.	See response in line JPA24.66	Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.68	The site presents an opportunity to deliver benefits by better defining the settlement boundary, providing a structured and soft-landscaped boundary to the south that enhances the Roch River valley setting and providing an improved network of footways and cycleways.	Support is noted. These matters are addressed in criteria 2,4,6 and 9 of the policy.	Taylor Wimpey Strategic Land
JPA 24.69	Building on the flood plain adjacent to the rivers, is not a good idea as the levels have increased over the years.	See response in line JPA24.66	Lynne Hastings
JPA 24.70	Surface water in the valley on Smithy Bridge Road frequently causes disruption to traffic. There are not enough details nor evidence to suggest that the site is safe and suitable to accommodate a development of such scale	See response in line JPA24.66	Smithy Bridge & Littleborough Save the Green Belt Group

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 24.71	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
JPA 24.72	The site is within a class 1 Radon area, but there are no known ground contaminants; albeit potential for ground water contamination which would be worthy of further exploration.	This issue is addressed within Section 12 of the Roch Valley Allocation Topic Paper 10.06.40 which deals with ground conditions. Paragraph 12.2 of the Topic Paper notes that a Final Phase 2 Geoenvironmental Investigation, Risk Assessment and Remediation Strategy has been submitted in support of the application. This report has been considered by the Council and any subsequent permission will be conditioned accordingly.	Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
JPA 24.73	There is an old mining area which has been dismissed	See response to JPA24.72	Graham Roberts
	Social Infrastructure and Recreation		
JPA 24.74	All existing social infrastructure is already overstretched with long waiting times	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. 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.	Jean Markham Angela Walker Heywood, Middleton and Rochdale Conservative Cllr's David Hill Peter Nightingale Brian Taylor Jennifer Barlow Sharon Lowe Leanne Backer Angela Clegg Jenny Walker

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall
JPA 24.75	There needs to be more investment in the local tourism	Investment in local tourism is an issue outside the scope of the PfE plan. The provision of good quality walking and cycling routes as set out in the allocation policy will help to improve access to local tourism assets. The Places for People Chapter of the plan includes a number of policies that support tourism opportunities across the plan area.	Angela Walker
JPA 24.76	There is already a severe shortage of senior school places for local children with many of them currently having to travel out of the area.	See response in line JPA24.74. 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 the delivery of two new secondary schools which have recently been awarded Government funding. One of these schools is proposed in Littleborough and is due to open within the next three years. This will assist significantly in meeting the need for secondary school places in this area and across the borough as a whole.	Jean Markham
JPA 24.77	This proposal is on the edge of the only country park in the area for recreation. There are adequate brown field sites nearby. This is a green land recreational area.	The provision of good quality walking and cycling routes as set out in the allocation policy will help to improve access to local tourism assets, including Hollingworth Lake. See response in line JPA24.5 regarding brownfield sites. The site currently comprises grazing land and therefore has no formal recreational value. Criteria in the allocations policy support the delivery of green infrastructure	Graham Roberts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		and good quality walking and cycling routes which will create more publicly accessible open space and routes.	
JPA 24.78	Plans for housing are useless without roads school places and medical services.	See response in line JPA24.74	Graham Roberts
JPA 24.79	Development of this site is likely to have a recreational disturbance on tourists and walkers using the area. There will also be significant detrimental impact on the features of the rural area and the river.	See response in line JPA24.77	Smithy Bridge & Littleborough Save the Green Belt Group
JPA 24.80	The site is well located in relation to existing services and facilities, including primary and secondary schools, health facilities, leisure and employment opportunities and retail provision. This demonstrates that it is clearly a sustainable site, particularly given the availability of access to public transport in close proximity to the site, which connects the site to Rochdale and the city centres of Manchester and Leeds and surrounding areas.	Support is noted.	Taylor Wimpey Strategic Land
	Modifications and Recommendations		
JPA 24.81	Point 4: regard to the river valley setting in terms of the design and layout, particularly in relation to the materials used, the incorporation of green and blue infrastructure and the landscaping along the southern boundary of the site. The above proposed modification corrects a typo and clarifies that it is the southern boundary of the site which should have particular regard to landscaping due to this boundary being adjacent to the River Roch and therefore in the valley setting.	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.	Taylor Wimpey Strategic Land
JPA 24.82	Point 7: Provide appropriate access to electric vehicle charging infrastructure and cycle storage in accordance with local planning policies and standards. This modification seeks to clarify that such infrastructure should be provided in accordance with local standards to ensure that this part of the policy is deliverable and, therefore, effective in relation to the tests of soundness.	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.	Taylor Wimpey Strategic Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
JPA 24.83	Point 8: Provide financial contributions to Mitigate impacts on the highway network identified through a transport assessment, including as necessary through financial contributions. Whilst it is accepted that some form of mitigation may be required to mitigate impact on highways, it is unjustified to assume that financial contributions are required. As outlined in the policy, such mitigation is to be determined through a transport assessment during the planning application process.	Paragraph 10.3 of the Roch Valley Allocation Topic Paper 10.06.40 sets out the mitigations identified in the Locality Assessment undertaken for this site. These are likely to result in financial contributions. Therefore, the point as worded is considered to be justified and sound and no change is considered necessary.	Taylor Wimpey Strategic Land
JPA 24.84	Point 9: The layout of the scheme should be designed in a way to so as not to prejudice the delivery of the eastern section of a proposed residential relief road between Smithy Bridge Road and Albert Royds Street. The extent to which the site development delivers the eastern section of this relief road will be determined through transport assessment and wider viability considerations as part of a planning application. This proposed new road will need to incorporate attractive, high quality pedestrian and cycle routes. It is accepted that there is an aspiration to deliver a residential relief road in this location; however, the details of which is a matter that needs to be resolved in the context of detailed assessments, design and wider viability considerations through a planning application. The wording cannot be so definitive to prescribe what development has to provide without having the necessary evidence on which to base these requirements on. Therefore, in order to ensure the policy is sound, in relation to being justified and effective, the above modifications are necessary.	Paragraphs 10.4 and 10.5 of the Roch Valley Allocation Topic Paper 10.06.40 provide detail in respect of the proposed residential relief road. Point 9 of the policy reflects these requirements and is considered to be sound. Therefore, no change is necessary.	Taylor Wimpey Strategic Land
JPA 24.85	Point 10: Where necessary, Provide 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 accepted that an education contribution may be required as a result of the proposed development; however, this is determined by relevant	Section 23 of the Roch Valley Allocation Topic Paper 10.06.40 identifies the issue of school places within the area. It notes that new development places increased demand on school provision and therefore the policy does include a requirement to provide contributions to ensure that there are sufficient school places to accommodate the new housing either through an expansion of existing schools or	Taylor Wimpey Strategic Land

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	assessments by the Applicant and the Authority through the planning application process. It is unjustified for the policy to assume that financial contributions will be required. The proposed modification above therefore ensures that the policy justified and effective, through taking into account the evidence work to be undertaken to respond to this policy requirement.	the provision of new school facilities. The policy is considered to be sound and no change is necessary.	
JPA 24.86	Recommend the following additional criteria to this policy. Ensure that sustainable drainage systems are fully incorporated into the development to manage and control surface water run-off, discharging in accordance with the hierarchy of drainage options. Applicants should consider site topography, any naturally occurring flow paths and any low lying areas where water will naturally accumulate. Resultant layouts should take account of such existing circumstances to ensure the most sustainable and flood resilient solution is achieved.	Policy JP-S5 of the plan sets out the overall approach to flood risk and water management, including details on sustainable drainage systems. Section 11 of the Roch Valley Allocation Topic Paper 10.06.40 deals with issues relating to flood risk and drainage. Criterion 3 of the policy requires the provision of sustainable urban drainage, The plan should be read as a whole and it is considered that the policy as worded is sound and no changes are necessary.	United Utilities Group PLC
JPA 24.87	Landscaping proposals will be expected to be integrated with the strategy for surface water management. Natural and multi-functional SuDS should be utilised (in preference to traditional piped and tanked storage systems), prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network. They will be designed in accordance with nationally recognised SuDS design standards.	See response in line JPA24.59 Criterion 3 of policy JP Allocation 24 makes specific reference to the need for appropriate water management in the site itself, including sustainable drainage infrastructure (SuDS)	United Utilities Group PLC
JPA 24.88	There should be a clear allocation-wide strategy for foul and surface water management which demonstrates a holistic approach with co-ordination between phases of development and no surface water discharging to public sewer. A proliferation of pumping stations should be avoided; New dwellings will be required to at least meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Any proposal must	See response in line JPA24.61 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.	United Utilities Group PLC

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>have full regard to the existing utility infrastructure that passes through the site. Early dialogue will be required with United Utilities to understand the implications of this infrastructure on the detailed design and layout including changes in site levels. Consideration and inclusion of appropriate protective measures both during construction and during the lifetime of the development will be required.</p>		

PfE 2021 Policy JP Allocation 25 – Trows Farm

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle / Scale of Development		
Policy JPA25.1	The plans comprise unsustainable development.	Policy JP-P 1 of the plan sets out an approach to deliver sustainable places. The allocation policy set out in the plan seeks to deliver sustainable development on this site. The Trows Farm Allocation Topic Paper 10.06.41 provides further detail on how this will be achieved.	Vicky Harper
Policy JPA25.2	Plans represent over-development of the area, which is being swamped with planning applications for housing and other developments.	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. 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.	Tina Chester
Policy JPA25.3	Concerns regarding viability and deliverability of site, specifically concerns regarding the approach taken to the viability report, which in reality shows the site as undeliverable.	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.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
	Housing (inc affordable housing)		
Policy JPA25.4	Investment should first be made to improve existing housing stock before building new homes.	Noted. However, this is a separate issue. There is still a requirement for local authorities to provide sufficient housing to meet the needs of the plan area.	Lynne Hastings
Policy JPA25.5	Local housing need can be met without the release of greenfield land.	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	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		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.	Tracy Raftery Lynne Hastings
Policy JPA25.6	Proposals not in line with national design guide.	Criterion 2 of the allocation policy states that the development will be required to achieve excellent design and sustainability through masterplanning and the use of design codes. The use of design codes is in line with recent national guidance.	Gerard Tod
Policy JPA25.7	Impacts of Brexit and the pandemic on housing / population numbers has not been properly considered.	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 .	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's)
Policy JPA25.8	Affordable housing is needed in local area - concerns that the site will not provide any affordable housing due to viability.	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 of the plan notes that affordable housing across the plan area will be delivered via a number of mechanisms, therefore the overall ambitions in relation to affordable housing are considered deliverable.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Clive Maynock Vicky Harper Greater Manchester Housing Providers
	Employment and Economy		
Policy JPA25.9	Proposals will not improve employment opportunities in the local area or address existing social imbalances.	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,	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		have the potential to attract skilled workers and hence boost the competitiveness of the north.	
Policy JPA25.10	Not enough local high-quality employment opportunities to support the proposals to build high-quality / high-value homes.	A key element of the Strategy [JP-Strat 6] within the plan is to boost the competitiveness of the north of the conurbation, including Rochdale. This will be achieved through the delivery of the North East Growth Corridor [JP-Strat 7] which will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix. See also response in line JPA25.9.	Lynne Hastings
	Green Belt / greenfield		
Policy JPA25.11	The landscape impact of building on green-belt / green-field will have a negative impact on tourism and in turn the local economy.	The site is in private ownership and has no formal tourism offer at present. Criterion 4 of the allocation policy requires the provision of safe and attractive walking and cycling routes within the site linking to the centre and the station. Criterion 6 also requires the provision good quality green and blue infrastructure having regard to existing biodiversity and greenspace corridors. . It is not considered that the proposal will result in a deterioration of the local tourism offer.	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's)
Policy JPA25.12	Contradicts green-belt policy on preventing the unrestricted sprawl of built up areas.	This site is not within the Green Belt.	Paul Roebuck
Policy JPA25.13	Exceptional circumstances for the release of green-belt land do not exist.	This site is not within the Green Belt	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Tracy Raftery
	Brownfield		
Policy JPA25.14	Brownfield sites should be developed before greenfield sites (brownfield first approach).	See response in line JPA25.5	Steven Murgatroyd

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			John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Clive Maynock Tina Chester Karen Lever Sur Jagger
	Transport		
Policy JPA25.15	Transport evidence associated with the proposed allocation is insufficient to identify the nature, scale and timing of infrastructure requirements from the proposed allocation.	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 that the transport evidence is proportionate and robust. The delivery of any required transport infrastructure will be linked to the development.	National Highways
Policy JPA25.16	Proposals will contribute to traffic congestion and pollution in the local area.	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. Section 21 of this Topic Paper deals with matters relating to Air Quality and criterion 11 of the allocation policy requires the incorporation appropriate noise and air quality mitigation along the M62 and A627(M) motorway corridors.	Paul Roebuck Gerard Tod John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Edward Ahmad Tina Chester Lynne Hastings
Policy JPA25.17	Concerns over highway safety.	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.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		<p>Access points and roads within the development will need to meet highways standards to ensure safety.</p> <p>Criterion 4 of the policy requires the development to provide safe and attractive walking and cycling routes to the local centre of Castleton and the railway station.</p>	
Policy JPA25.18	Public transport provision in the area is not sufficient to cope with the additional demand that will be created by the development.	<p>Paragraphs 11.245 and 11.246 of the supporting text to the allocation policy notes that Castleton benefits from a range of high quality transport links, including public transport, walking and cycling, as well as good access to the motorway network. Criterion 4 of the policy requires the development to provide safe and attractive walking and cycling routes to the local centre of Castleton and the railway station. 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.</p> <p>Paragraph 10.13 of this Topic Paper notes that the improved Cowm Top Lane and the allocation layout could accommodate bus services, if they are introduced in the future.</p>	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
Policy JPA25.19	Site is not close to rail or motorway links.	See response in line JPA25.18.	Paul Roebuck John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA25.20	Existing local roads are unsuitable to accommodate additional demand created by traffic associated with the development.	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.	Gerard Tod Janine Lawford Tina Chester Darren Wright
	Physical Infrastructure and Utilities		
Policy JPA25.21	Concerns regarding ground quality due to the location of the site next to the motorway and major highway which could offer opportunities for contamination of both the ground and water supply.	This issue is addressed within Section 12 of the Trows Farm Allocation Topic Paper 10.06.41 which deals with ground conditions.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
Policy JPA25.22	There is a gas pipeline located within the site - HSE should be consulted.	Paragraph 13.2 of the Trows Farm Allocation Topic Paper 10.06.41 notes that a high-pressure gas pipeline crosses the western part of the site and will require a	Save Greater Manchester's Green

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		stand-off from built development. To accommodate the presence of the pipeline and the required stand-off zone, it is proposed that a linear park area is located along the western boundary of the site, ensuring this area remains free from future residential development. This is shown on the indicative masterplan for the site. Appropriate consultation would take place with relevant bodies at planning application stage.	Belt (SGMGB) – Rochdale Groups
	Social Infrastructure		
Policy JPA25.23	Greater school provision needs to be provided to accommodate additional demand from the development.	Paragraph 11.250 of the supporting text to the policy notes the issue of school places in the area. Criterion 12 of the policy 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. In addition, 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. The Plan needs to be read as a whole, therefore no change is considered necessary.	Edward Ahmad Vicky Harper
Policy JPA25.24	Local services and facilities are not accessible from the site.	Criterion 4 of the policy requires the development to provide safe and attractive walking and cycling routes to the local centre of Castleton and the railway station. Castleton centre provides a range of services and facilities and has good public transport links to other parts of the conurbation.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Vicky Harper Karen Lever
Policy JPA25.25	Existing local infrastructure (e.g. services and energy supply) unsuitable to accommodate the additional demand that will be created by the development.	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.	Gerard Tod John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Janine Lawford Clive Maynock Nigel Morrell

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
			Tina Chester Vicky Harper
Policy JPA25.26	Local schools and services are already at capacity and cannot cope with additional demand.	See response in line JPA25.23	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Tina Chester
	Environmental		
Policy JPA25.27	Objection to the loss of green space / protected open land / accessible leisure space.	See response in line JPA25.5 in terms of the need for some Green Belt / greenfield release to accommodate development needs across the plan area. 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 is a Public Right of Way (PRoW) which runs along the western boundary and also along Cripple Gate Lane to the north of the site. Both of these PRoWs are to be retained and utilised to provide linkages from the site to the surrounding local area. The green infrastructure within the scheme will provide an opportunity to deliver publicly accessible open space including children's play.	Steven Murgatroyd Gerard Tod John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Nigel Morrell Edward Ahmad Simon Robertson Tina Chester Vicky Harper Karen Lever Darren Wright Sue Jagger Lynne Hastings Marc O'Driscoll
Policy JPA25.28	The landscape impact of proposals will be significant.	The issue of impact on the landscape is addressed in criteria 9 of the policy which ensures that development provides a positive visual impact given its prominent position adjacent to the M62 and A627(M) motorways	Save Greater Manchester's Green

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			Belt (SGMGB) – Rochdale Groups
Policy JPA25.29	The proposals do not sufficiently address climate change / do not align with climate emergency targets.	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. Therefore this policy is considered sound.	Paul Roebuck John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)
Policy JPA25.30	The proposals will add to noise and light pollution in the local area.	Criterion 11 of the allocation policy requires the incorporation of appropriate noise and air quality mitigation along the M62 and A627(M) motorway corridors. 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. Therefore, the policy is considered sound.	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Edward Ahmad
Policy JPA25.31	The proposals do not / should prioritise the health and well-being of local communities.	The Trows Farm Allocation Topic Paper 10.06.41 deals with a range of issues relating to the quality of life for existing and future residents. This has resulted in the criteria included in the policy which seek to deliver open spaces and safe and attractive walking and cycling routes. The plan as a whole seeks to safeguard and improve quality of life of local residents, for example policy JP-P 1 which focusses on the delivery of sustainable places. No changes are considered necessary.	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's) Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
Policy JPA25.32	Resist the destruction of natural habitats / wildlife / biodiversity – the site is adjacent site of biological importance.	Section 18 of the Trows Farm Allocation Topic Paper 10.06.41 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. Criterion 7 of the policy requires a project	Gerard Tod John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		specific Habitats Regulation Assessment for planning applications of 50 dwellings or more to assess any impact on the Rochdale Canal which is a designated National and European site in close proximity to this allocation. In addition, policy JP-G 9 of the plan provides further safeguards in respect of biodiversity including on sites identified for new development and Local Plan policies deal with development that may affect Sites of Biological Importance.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Janine Lawford Tina Chester Vicky Harper Darren Wright Tracy Raftery
Policy JPA25.33	Object to the increase in pollution as a result of the development and the negative impact this will have on the on physical health of local residents.	See response in line JPA25.30.	Gerard Tod Edward Ahmad Vicky Harper
Policy JPA25.34	The impact of the adjacent motorway noise on the development needs to be considered in terms of acoustic mitigation.	See response in line JPA25.30 in relation to the mitigation of noise from the adjacent motorways.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
	Flood Risk and Drainage		
Policy JPA25.35	Concerns regarding increased surface water exacerbating existing drainage / 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.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups Janine lawford Clive Maynock Vicky Harper Lynne Hastings
Policy JPA25.36	Proposals do not provide enough detail on foul drainage arrangements.	Paragraph 11.9 of Trows Farm Allocation Topic Paper 10.06.41 notes that options in relation to foul drainage were still being considered. It adds that United Utilities have confirmed that both solutions being looked are acceptable. Therefore, no changes are considered necessary.	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
	Heritage		

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Policy JPA25.37	Archaeological investigations should be undertaken prior to the allocation, not as part of any planning application.	This is a requirement set out in criterion 8 of the policy and evidenced in the findings of the Trows Farm Historic Environment Assessment 10.06.33 which are summarised in section 20 of the Trows Farm Allocation Topic Paper 10.06.41	Save Greater Manchester's Green Belt (SGMGB) – Rochdale Groups
	Other		
Policy JPA25.38	The allocation map should clearly indicate whether or not the allocation overlies a Mineral Safeguarding Area.	The Greater Manchester Joint Minerals Development Plan (GMJMDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDP and will remain unchanged and applicable once PfE is adopted. Therefore it is not necessary to identify them on the PfE policies map and no change is necessary.	Mineral Products Association
Policy JPA25.39	Concerns over the loss of jobs associated with the existing horse riding business on the site.	The responses in lines JPA25.9 and JPA25.10 set the intention to significantly grow the economy in the north of the conurbation, including Rochdale. This will result in a significant increase in the number and range of jobs accessible to local residents.	CPRE
Policy JPA25.40	Proposals do not meet the objectives set out in PfE.	The site will deliver a high quality development that accords with the Chapter 3 Vision of the PfE plan. The allocations policy seeks to achieve this and is further evidenced through the Trows Farm Allocation Topic Paper 10.06.41 and associated evidence. Therefore, the policy is considered sound and no changes are necessary.	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's)
Policy JPA25.41	Concerns regarding consultation process being insufficient.	Consultation was undertaken in accordance with the Council's Statement of Community Involvement as set out in the SCI Compliance Statement.	John Taylor (Heywood, Middleton and Rochdale Conservation Cllr's) Clive Maynard

Appendix

Respondents to PfE 2021 Policy JP Allocation 19 – Bamford/Norden

Row	Respondent name(s)
JPA19.1	John Ripley Paul Marshall Daniel Jackson Barry Lewis Angela Smith Helen Bingham Wendy Byrne Jane Hanna Chris White Susan Travis Catherine Hanna Barbara Brown Wendy Connolly Lynn Lovell Laxman Thakur Rebecca Connolly Richard Rothwell Sandra McManus Stephen Clark Kath Birchall Andrea Hall
JPA19.5	Daniel Parkin John Ripley Paul Marshall Daniel Jackson Barry Lewis Desi Friel Angela Smith

Wendy Byrne
Helen Jones
Donna Gallagher
Jane Hanna
Anthony Pockney
Kath Platt
Robert Hudson
Roy Grundy
Catherine Hanna
Anne Shorrock
Grenville Evans
Jean Butler
Robert Aston
Barbara Brown
Wendy Connolly
Neil Crook
Leigh Crook
John Garner
Lynn Lovell
Jonathan Sudlow
Alan Hamer
Christopher Pearson
Kathryn Cotter
Vivienne Cooper
Elsie Hack
Angela Marshall
Andrew Marshall
Natalie Fitzpatrick
Stephen Clark
Dermot Garvey
Bryan Scott
Farooq Azam
David Fletcher

John Taylor
Kath Birchall
Malcolm Wilson
Mark Brown
John Lonergan
Laura Barnes
Julie Hargreaves
Maria Murphy
Mark Hargreaves
Sonia Smith
Daniel Hargreaves
Ian Hampson
Diane Robinson
Angela Nunns
Carolynn Brierley
Michael Cummings
Julie Ayton
Elaine Garner
Mushtak Shariff
Nigel Sarbutts
Ian Geary
Samuel Clarkson
Vivienne Clarkson
Sadaf Khan
John Coupe
Sarah Smith
David Hobson
Robert Wolf
Eadie Weatherilt
Andrew Dunn
Lucy Williamson
Sarah Whittaker
Janice Arden

	Peter Bailey Timothy O'Brien Gerard Smith Alan Donegan Christian Morris Christopher Morgan Lynne Spellacy Annabel Morris Deborah Furber Anne Ripley Yvonne Earl anthony rigby Anne Ripley Mary Knowles Simon Ripley Barbara Tunstall John Worthy Richard Conlon Cherry Hardiman Patricia Sullivan Elizabeth Marie Shaw Veronica Wilson Philip Bailey
JPA19.6	Louise Poyning Susan Smith John Norbury Daniel Jackson Ian Smith Helen Bingham Wendy Byrne Anthony Pockney Susan Smith Robert Hudson

	<p>Susan Harrington Grenville Evans Jean Butler Wendy Connolly Pauline Massey John Langford Nicola Almond Christine Hudson Pamela Lea Enid Martini Barbara Lewin Sonia Wilson Nick Lonergan Mark Brown Henry Moody Paul Kallee-Grover Janine Chapman Sarah Smith Linda Ratchford Mary Knowles Trevor Mayne</p>
JPA19.7	<p>Neil Crook Leigh Crook Mark Brown Julie Hargreaves Mark Hargreaves Norman Eames Carole Tuckley Beryl Morris Janice Arden Peter Bailey Annabel Morris Bamford Green Belt Action Group</p>

JPA19.8	Andrew Wales Paul Marshall Daniel Jackson Barry Lewis Kirsty O'Brien Keith Smith Wendy Byrne Sandra Geary Susan Travis Grenville Evans Jean Butler Robert Aston Neil Crook Leigh Crook Patricia Astbury John Garner Lynn Lovell Pauline Massey John Langford Richard Rothwell Lesley Spencer George Waugh Valerie Mcgrann Judith Wilkes Enid Martini Sonia Wilson Farooq Azam Simon Lord Kath Birchall Pamela Harrington Judith Stott Ian Cochrane Mark Brown
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	Kenneth Unsworth
	Carolynn Brierley
	Angus Robinson
	Sharon Eames
	Norman Eames
	Ian McCall
	Sharon Eames
	Christopher Underhill
	Mushtak Shariff
	Nigel Sarbutts
	Carole Tuckley
	Samuel Clarkson
	Vivienne Clarkson
	Janine Chapman
	Sadaf Khan
	Brian Robinson
	Michael Davis
	Beryl Morris
	Lesley Stiles
	Sonia George
	Trudy Lymer
	Daniel Whittaker
	Linda Powell
	Dorne Cloran
	Craig Cloran
	Kimberley Noonan
	Christopher Noonan
	Deborah Furber
	Vicky Harper
	Vanessa Hobson
	Helen Illingworth
	Anthony Rigby
	Anne Ripley

	Claire Smith Greater Manchester Housing Providers
JPA19.9	Daniel Jackson Barry Lewis Edward Artingstoll Grenville Evans Mark Hargreaves Daniel Hargreaves Samuel Clarkson Vivienne Clarkson Stephen Hague Richard Gibbons
JPA19.14	Susan Smith Claire Bayman John Ripley Daniel Jackson John Blackburn Keith Smith Angela Smith Beryl Bulcock Helen Bingham Wendy Byrne David Troughton Jane Hanna Anthony Pockney Chris White Leighan Beesley Catherine Hanna Anne Shorrock Richard Baron Emma Buckley Robert Aston

Barbara Brown
Nicola Hudson
Wendy Connolly
Neil Crook
Gareth Garside
Janet Taylor
Katrina Sartini
Virginia Newman
John Garner
Lynn Lovell
Laxman Thakur
Pauline Massey
Ian Robinson
Chris Nolan
Roy King
Des Morris
Lorraine Dewhurst
Nicola Almond
Alan Hamer
Richard Rothwell
Gordon McGeechan
Cy Talbot
Sandra McManus
Claire Rea
Vivienne Cooper
Judith Wilkes
Dermot Garvey
Farooq Azam
Afia Saeed
Heywood, Middleton and Rochdale
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Ian Cochrane

Mark Brown
John Lonergan
Julie Hargreaves
Mark Hargreaves
David Hinton
Mel Fawcett
Deborah Friend
Andrew Nunns
Christine Murphy
Michael Cummings
David Gibbs
Angus Robinson
Sharon Eames
Ian McCall
Julie Ayton
Michael Hall
Helen Fearon
Claire Sunderland
John Lymer
Robert Kneale
Lori Reid
Barbara Jones
Paul Bolton
Patricia Wolf
Robert Cummings
Brian Robinson
Susan Cummings
Edward Ahmad
Stephen George
Lesley Stiles
Sonia George
Thomas George
Tim Peel

	<p>Janice Arden Peter Bailey Timothy O'Brien Jonathan Preston Christian Morris Lisa Bailey Lynne Spellacy Kimberley Noonan Bamford Green Belt Action Group Yvonne Earl Helen Illingworth Amanda Murphy Susan Chadwick Barbara Tunstall Christopher Verey Jill Verey Tracy Raftery Richard Conlon Trevor Mayne Graham Taylor Kathryn Hilton Patricia Crossley Greg Goddard Patricia Sullivan Paul And Anna Blomfield Lynne Hastings Lynne Hastings Philip Bailey Philip Bailey</p>
JPA19.15	<p>Paul Roebuck Philip Greenwood Susan Smith Claire Bayman</p>

John Ripley
John Norbury
Paul Marshall
Daniel Jackson
Barry Lewis
Kirsty O'Brien
Desi Friel
Keith Smith
Angela Smith
Chris Houston
Helen Bingham
Wendy Byrne
David Troughton
Sandra Geary
Helen Jones
Matthew Jackson
Jack Day
Jane Hanna
Anthony Pockney
Kath Platt
Leighan Beesley
Robert Hudson
Susan Travis
Catherine Hanna
Edward Artingstoll
John Williams
Anne Shorrock
Richard Baron
Emma Buckley
Grenville Evans
Jean Butler
Robert Aston
Nicola Hudson

	Rob Mcloughlin
	Wendy Connolly
	Leigh Crook
	Gareth Garside
	Janet Taylor
	Patricia Astbury
	John Garner
	Lynn Lovell
	Laxman Thakur
	Pauline Massey
	Ian Robinson
	John Langford
	Chris Nolan
	Jeffrey Roberts
	Lorraine Dewhirst
	Nicola Almond
	Alan Hamer
	Rebecca Connolly
	Richard Rothwell
	Christine Hudson
	Christopher Pearson
	Gordon McGeechan
	Marion Mills
	Cy Talbot
	Claire Rea
	Valerie Mcgrann
	Kathryn Cotter
	Duncan Hopton
	Vivienne Cooper
	Elsie Hack
	Judith Wilkes
	Andrew Marshall
	David Duerden

David Edmonds
David Flynn
Stephen Clark
Stephen Derbyshire
Dermot Garvey
Bryan Scott
Sonia Wilson
David Fletcher
Afia Saeed
Heywood, Middleton and Rochdale Conservative Cllr's
Kath Birchall
Malcolm Wilson
Pamela Harrington
Judith Stott
Nick Lonergan
Katy Hoole
Richard Oldfield
Sharon Hopwood
David Sharples
Ian Cochrane
Michael Parkins
Mark Brown
Julie Hargreaves
Mark Hargreaves
Sonia Smith
Kenneth Unsworth
Diane Robinson
Brian Bevan
Henry Moody
Deborah Friend
Andrew Nunns
Angela Nunns

Michael Cummings
Anthony Wicker
Norman Eames
Ian McCall
Sharon Eames
Julie Ayton
Christopher Underhill
Elaine Garner
Mushtak Shariff
Claire Sunderland
John Lymer
Ian Geary
Robert Kneale
Judith Brierley
Lori Reid
Patricia Wolf
Francis Phillips
Christine Mills
Gillian Saunders
Maria Owen
caroline broomhead
Stephen Thorpe
Graham Thorpe
Brian Robinson
Claire Thorpe
Susan Cummings
Elaine Gill
Freda Moody
Michael Davis
Alex Richardson
geoffrey hargreaves
Eadie Weatherilt
Carol Garside

Stephen Garside
Lesley Stiles
Thomas George
Rodney Collins
Louise Collins
Carole Threlfall
Emma Wailes
Thomas Hargreaves
Amy Mason
Lucy Wilkinson
Janice Arden
Julie Hill
John Pickersgill
Jo Wimbush
Simon Robertson
Michelle Kennedy-Lucas
Cliff Lucad
Toby Miskiewicz
Linda Powell
Ken Smith
Christian Morris
Oliver Jones
Kimberley Noonan
Yvonne Earl
Vanessa Hobson
Helen Illingworth
Anthony Rigby
Amanda Murphy
Kristina Colligan
Nathan Brammeier
Sudarat Hargreaves
Michael Harrington
Kathleen Hargreaves

	<p>Simon Ripley Barbara Tunstall John Worthy Christine Alty Richard Conlon Michael and Elsie Purrett Victoria Taylor Cherry Hardiman Graham Taylor Elizabeth Marie Shaw Paul And Anna Blomfield Philip Bailey Marc O'Driscoll Philip Bailey</p>
JPA19.16	<p>Claire Bayman John Ripley Daniel Jackson Angela Smith Robert Hudson Maureen Grundy Barbara Brown Wendy Connolly Christine Hudson Claire Rea Mel Fawcett</p>
JPA19.21	<p>John Lea David Edmonds David Fletcher Malcolm Wilson Mel Fawcett David Gibbs Linda Ratchford John Richardson</p>

	Ruth Moynihan
JPA19.22	Andrew Wales Claire Bayman Daniel Jackson Keith Smith Angela Smith Helen Bingham Jack Day Jane Hanna Lyn White Robert Hudson Susan Travis Susan Harrington Catherine Hanna John Williams Anne Shorrock Richard Baron Robert Aston Nicola Hudson Wendy Connolly Neil Crook Leigh Crook John Garner Christine Hudson Dermot Garvey Mark Hargreaves Daniel Hargreaves Sheila Unsworth Elaine Garner Robert Kneale Paul Bolton Samuel Clarkson Vivienne Clarkson

	<p>Robert Wolf Geoffrey Hargreaves John Pickersgill Andy Wailes Peter Bailey Sarah Cadell John Walker Ruth Moynihan Michael and Elsie Purrett Edith Mills</p>
JPA19.23	<p>Ian Smith Robert Hudson Nicola Hudson Wendy Connolly Pamela Harrington David Sharples Julie Ranson Mary Collins Paul And Anna Blomfield</p>
JPA19.24	<p>Daniel Parkin Claire Lomas Andrew Wales Philip Greenwood Andrew Drummond Susan Smith Claire Bayman John Norbury Paul Marshall Daniel Jackson Barry Lewis John Blackburn Kirsty O'Brien Ian Smith</p>

Keith Smith
Angela Smith
Colin Gibson
Beryl Bulcock
Helen Bingham
Wendy Byrne
David Troughton
Ian Warrington
Helen Jones
Matthew Jackson
Jack Day
Jane Hanna
Elizabeth Bardsley
Anthony Pockney
Jayne Hill
Lyn White
Leighan Beesley
Robert Hudson
Susan Travis
Susan Harrington
Catherine Hanna
Edward Artingstoll
Gaynor Cole
John Williams
Richard Baron
Emma Buckley
Liam Buckley
Grenville Evans
Jean Butler
Robert Aston
Nicola Hudson
Rob Mcloughlin
Wendy Connolly

Neil Crook
Leigh Crook
Angela Lutkevitch
Janet Taylor
Virginia Newman
Patricia Astbury
John Garner
Laxman Thakur
Harry Corless
Jonathan Sudlow
Stephanie Brady
Gabriela Sanderson
Greg Taylor
Barbara Blackburn
Pauline Massey
Ian Robinson
John Langford
Chris Nolan
Roy King
Lorraine Dewhirst
John Lea
Rebecca Connolly
Richard Rothwell
Christine Hudson
Pamela Lea
Gordon McGeechan
Mark Golding
Mark Golding
Cy Talbot
Sandra McManus
Lesley Spencer
Claire Rea
George Waugh

Valerie Mcgrann
Elsie Hack
Judith Wilkes
Angela Marshall
Enid Martini
David Duerden
Barbara Lewin
David Flynn
Natalie Fitzpatrick
Stephen Clark
David Lees
Stephen Derbyshire
Dermot Garvey
Bryan Scott
Sonia Wilson
Farooq Azam
David Fletcher
Lynn Farrington
Kath Birchall
Malcolm Wilson
Susan Bunting
Judith Stott
Katy Hoole
Richard Oldfield
Sharon Hopwood
David Sharples
Ian Cochrane
Mark Brown
John Lonergan
Georgia Ranson
Julie Ranson
Michelle Anderson
Maria Murphy

Sonia Smith
Ian Hampson
Kenneth Unsworth
Sheila Unsworth
Jeanette Warburton
Diane Robinson
David Hinton
Brian Bevan
Mel Fawcett
Janet Whittles
Henry Moody
Deborah Friend
Michael Cummings
David Gibbs
Angus Robinson
Anthony Wicker
Sharon Eames
Andrea Hall
Ian McCall
Sharon Eames
Julie Ayton
Mark Iveson
John Lymer
Joanna Ahmad
Paul Kallee-Grover
Judith Brierley
Lori Reid
Barbara Jones
Patricia Wolf
Samuel Clarkson
Vivienne Clarkson
Frank Shackleton
Philippa Madgin Ramsden

Janine Lawford
Marilou Scott
Sylvia Rutter
Mary Collins
Gillian Saunders
Maria Owen
caroline broomhead
Brian Robinson
David Hobson
Janette Hindle
Yvonne Eccles
Freda Moody
Michael Davis
Robert Wolf
John Malone
Edward Ahmad
Eadie Weatherilt
James Turner
Beryl Morris
Gill Cummings
Graham Morris
Christine Coleman
Amy Mason
Daniel Whittaker
Sarah Whittaker
Julie Hill
Timothy O'Brien
Stephen Warburton
Suzanne Gauge
Steve Hughes
Michelle Kennedy-Lucas
Cliff Lucad
Alan Donegan

Jonathan Preston
Linda Powell
Ken Smith
Christian Morris
Dorne Cloran
Craig Cloran
Sandra Margaret Walker
Lisa Bailey
Annabel Morris
Joanne Morris
Anne Ripley
Jeffrey Gardner
Margaret Upton
David Pennock
Dawn Chadwick
Nathan Brammeier
Michael Harrington
Kathleen Hargreaves
Nadia Akhtar
Damian Carter-Raby
Michelle Garside
Christopher Verey
John Worthy
Jill Verey
Ruth Moynihan
M R Hanna
Trevor Mayne
Peter B Wilson
Stephen Hague
Richard Gibbons
David And Valerie Ternent
Michael and Elsie Purrett
Celia Wilkinson

	Victoria Taylor Jack Putman Cherry Hardiman Graham Taylor Ian Hill David Wrigley Patricia Sullivan Diane Reid Elizabeth Marie Shaw Veronica Wilson National Highways Philip Bailey
JPA19.26	Barry Lewis John Blackburn Kirsty O'Brien Angela Smith Lyn White John Williams Rob Mclouglin Wendy Connolly Roy King Judith Stott Mark Hargreaves Daniel Hargreaves Janice Arden Ruth Moynihan Susannah Turner
JPA19.27	Andrew Drummond Susan Smith Claire Bayman Daniel Jackson Barry Lewis Kirsty O'Brien

Angela Smith
Jane Hanna
Lyn White
Susan Travis
Susan Harrington
Catherine Hanna
John Williams
Grenville Evans
Rob Mclouglin
Wendy Connolly
Neil Crook
Leigh Crook
Patricia Astbury
John Garner
Gabriela Sanderson
Pauline Massey
Chris Nolan
Roy King
Rebecca Connolly
Gordon McGeechan
Cy Talbot
Claire Rea
Andrew Marshall
david duerden
Natalie Fitzpatrick
Dermot Garvey
Farooq Azam
Afia Saeed
John Taylor
Judith Stott
Nick Lonergan
Mark Brown
Julie Hargreaves

	Maria Murphy
	David Hinton
	Mel Fawcett
	Janet Whittles
	Michael Cummings
	Anthony Wicker
	Nigel Sarbutts
	Paul Kallee-Grover
	Carole Tuckley
	Barbara Jones
	Paul Bolton
	Linda Handley
	Janine Chapman
	Marilou Scott
	Mary Collins
	Clare Nesbitt
	John Coupe
	Gillian Saunders
	Claire Thorpe
	Janette Hindle
	John Malone
	Edward Ahmad
	Alex Richardson
	Eadie Weatherilt
	Carol Garside
	Diana Collins
	Andrew Dunn
	Louise Collins
	Janice Arden
	Peter Bailey
	Steve Hughes
	Jonathan Preston
	Christopher Morgan

	<p>Christopher Noonan Emily Jones Neil Hickford Amanda Murphy Susan Chadwick Kristina Colligan Kathleen Hargreaves Ian Groome Damian Carter-Raby Ruth Moynihan Susannah Turner Peter B Wilson David And Valerie Ternent Graham Taylor David Wrigley Kathryn Hilton Patricia Crossley Philip Bailey</p>
JPA19.28	<p>Philip Greenwood Susan Smith Claire Bayman Paul Marshall Daniel Jackson Barry Lewis John Blackburn Kirsty O'Brien Ian Smith Desi Friel Keith Smith Angela Smith Beryl Bulcock Helen Bingham Wendy Byrne</p>

David Troughton
Sandra Geary
Helen Jones
Jane Hanna
Anthony Pockney
Jayne Hill
Lyn White
Leighan Beesley
Robert Hudson
Susan Travis
Catherine Hanna
Edward Artingstoll
John Williams
Liam Buckley
Grenville Evans
Jean Butler
Robert Aston
Rob Mclouglin
Wendy Connolly
Neil Crook
Leigh Crook
Gareth Garside
Janet Taylor
Katrina Sartini
Lynn Lovell
barry corless
Stephanie Brady
Gabriela Sanderson
Greg Taylor
Pauline Massey
Chris Nolan
Jeffrey Roberts
Roy King

Lorraine Dewhurst
John Lea
Alan Hamer
Derek Gregory
Rebecca Connolly
Christine Hudson
Christopher Pearson
Gordon McGeechan
Cy Talbot
Sandra McManus
Claire Rea
George Waugh
Valerie Mcgrann
Angela Marshall
Andrew Marshall
Enid Martini
David Duerden
David Armbrister
Farooq Azam
David Fletcher
Heywood, Middleton and Rochdale Conservative Cllr's
Kath Birchall
Malcolm Wilson
Nick Lonergan
Richard Oldfield
Sharon Hopwood
Michael Parkins
Mark Brown
Julie Ranson
Michelle Anderson
Julie Hargreaves
Mark Hargreaves

Sonia Smith
Daniel Hargreaves
Kenneth Unsworth
Sheila Unsworth
David Hinton
Mel Fawcett
Andrew Nunns
Christine Murphy
Michael Cummings
David Gibbs
Anthony Wicker
Norman Eames
Julie Ayton
Andrew Friend
Nigel Sarbutts
Joanna Ahmad
Ian Geary
Carole Tuckley
Barbara Jones
Patricia Wolf
Samuel Clarkson
Linda Handley
Vivienne Clarkson
Sadaf Khan
Mary Collins
Francis Phillips
John Coupe
Maria Owen
Sarah Smith
Claire Thorpe
Janette Hindle
Elaine Gill
Robert Saunders

Beryl Morris
Stephen George
Thomas George
Diana Collins
Rodney Collins
Louise Collins
Alan Greenwood
Andy Wailes
Suzanne Gauge
Michelle Kennedy-Lucas
Cliff Lucad
Ann Durante
Jonathan Preston
Christopher Morgan
Lynne Spellacy
Annabel Morris
Emily Jones
Bamford Green Belt Action Group
Margaret Roberts
Vicky Harper
Yvonne Earl
Kristina Colligan
Ruth Moynihan
Susannah Turner
Peter B Wilson
Stephen Hague
Richard Gibbons
David And Valerie Ternent
Victoria Taylor
Kathryn Hilton
Patricia Crossley
Diane Reid
Veronica Wilson

	Philip Bailey
JPA19.29	Claire Lomas Andrew Wales Claire Bayman Liam Buckley Angela Lutkevitch Katrina Sartini Stephen Clark Thomas George
JPA19.30	Paul Roebuck Susan Smith Claire Bayman John Norbury Daniel Jackson John Blackburn Kirsty O'Brien Angela Smith Helen Bingham Wendy Byrne David Troughton Sandra Geary Jack Day Jane Hanna Anthony Pockney Jayne Hill Lyn White Robert Hudson Maureen Grundy Susan Travis Catherine Hanna Edward Artingstoll Anne Shorrocks Grenville Evans

	<p>Jean Butler Robert Aston Rob Mclouglin Wendy Connolly Angela Lutkevitch Gareth Garside Janet Taylor Lynn Lovell Barry Corless Stephanie Brady Christine Hudson Marion Mills Andrew Marshall David Duerden Dermot Garvey Bryan Scott Farooq Azam David Fletcher Heywood, Middleton and Rochdale Conservative Cllr's Pamela Harrington Judith Stott Julie Hargreaves Mark Hargreaves Sonia Smith Daniel Hargreaves Christine Murphy</p>
JPA19.35	<p>Helen Bingham John Williams Mark Hargreaves Daniel Hargreaves Michael Cummings Mark Iveson</p>

	George Trevor Steven Williams Brian Robinson
JPA19.36	David Troughton John Williams Anne Shorrocks Neil Crook Leigh Crook Greg Taylor Christine Hudson Kath Birchall Mark Brown Mark Hargreaves Daniel Hargreaves Norman Eames Ian McCall Sharon Eames John Lymer Ian Geary Paul Kallee-Grover Barbara Jones Samuel Clarkson Vivienne Clarkson Daniel Whittaker Peter Bailey Christian Morris Bamford Green Belt Action Group Claire Smith Kathleen Hargreaves Veronica Wilson Philip Bailey
JPA19.39	Claire Bayman Paul Marshall Daniel Jackson

Barry Lewis
Desi Friel
Keith Smith
Angela Smith
Helen Jones
Jane Hanna
Elizabeth Bardsley
Leighan Beesley
Susan Travis
Catherine Hanna
Edward Artingstoll
John Williams
Richard Baron
Emma Buckley
Liam Buckley
Grenville Evans
Jean Butler
Robert Aston
Nicola Hudson
Rob Mclouglin
Wendy Connolly
Neil Crook
Leigh Crook
Janet Taylor
Katrina Sartini
Virginia Newman
Patricia Astbury
John Garner
Lynn Lovell
Laxman Thakur
Barry Corless
Gabriela Sanderson
Barbara Blackburn

Pauline Massey
Ian Robinson
Jeffrey Roberts
Richard Rothwell
Christopher Pearson
Marion Mills
Claire Rea
Valerie Mcgrann
Duncan Hopton
Vivienne Cooper
Elsie Hack
Angela Marshall
Andrew Marshall
Paul Bailey
Enid Martini
Barbara Lewin
David Flynn
Stephen Clark
Dermot Garvey
David Fletcher
Susan Bunting
Pamela Harrington
Judith Stott
Nick Lonergan
Katy Hoole
Richard Oldfield
Sharon Hopwood
David Sharples
Ian Cochrane
Michael Parkins
Mark Brown
Georgia Ranson
Julie Hargreaves

Mark Hargreaves
Sonia Smith
Daniel Hargreaves
Ian Hampson
Kenneth Unsworth
Sheila Unsworth
Diane Robinson
David Hinton
Janet Whittles
Henry Moody
Andrew Nunns
Christine Murphy
Michael Cummings
David Gibbs
Julie Ayton
Elaine Garner
Andrew Friend
Nigel Sarbutts
Joanna Ahmad
Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Robert Kneale
Judith Brierley
Barbara Jones
Paul Bolton
Samuel Clarkson
Vivienne Clarkson
Frank Shackleton
Janine Chapman
Mary Collins
John Coupe
Christine Mills
Maria Owen

	Brian Robinson
	Yvonne Eccles
	Robert Wolf
	Alex Richardson
	Linda Ratchford
	Sonia George
	Thomas George
	Diana Collins
	Rodney Collins
	Amy Mason
	Jo Wimbush
	Steve Hughes
	Michelle Kennedy-Lucas
	Cliff Lucad
	Jonathan Preston
	Christopher Morgan
	Annabel Morris
	Adrian Coan
	Emily Jones
	Bamford Green Belt Action Group
	Margaret Upton
	Helen Illingworth
	Nathan Brammeier
	Ryan Smith
	Claire Smith
	Kathleen Hargreaves
	Christopher Verey
	John Worthy
	M R Hanna
	Peter B Wilson
	Michael and Elsie Purrett
	Edith Mills
	Cherry Hardiman

	<p>Ian Hill Elizabeth Marie Shaw Veronica Wilson Philip Bailey</p>
JPA19.40	<p>Andrew Wales Philip Greenwood Daniel Jackson Barry Lewis Ian Smith Desi Friel Keith Smith Angela Smith Colin Gibson Chris Houston Beryl Bulcock Helen Bingham Wendy Byrne Ian Warrington Helen Jones Jane Hanna Elizabeth Bardsley Anthony Pockney Jayne Hill Kath Platt Leighan Beesley Robert Hudson Susan Travis Susan Harrington Catherine Hanna Gaynor Cole John Williams Jean Butler Richard Rothwell</p>

	Valerie Mcgrann Enid Martini Afia Saeed Nick Lonergan David Sharples Christine Murphy Angela Nunns Angus Robinson Mark Iveson Patricia Wolf Clare Nesbitt David Hobson Freda Moody Stephen George Margaret Wilcox Trudy Lymer John Pickersgill Peter Bailey Sarah Cadell Christian Morris Vicky Harper David Pennock Damian Carter-Raby Jill Verey
JPA19.41	Robert Aston Nicola Hudson Rob Mclouglin Janet Taylor Virginia Newman Barbara Blackburn Ian Robinson Jeffrey Roberts Marion Mills

George Waugh
Duncan Hopton
Vivienne Cooper
Elsie Hack
Paul Bailey
David Flynn
Natalie Fitzpatrick
Stephen Clark
Bryan Scott
David Fletcher
Heywood, Middleton and Rochdale
Conservative Cllr's
Susan Bunting
Judith Stott
Nick Lonergan
David Sharples
Mark Brown
Maria Murphy
Ian Hampson
Kenneth Unsworth
Sheila Unsworth
Diane Robinson
David Hinton
Brian Bevan
Janet Whittles
Henry Moody
Michael Cummings
Mushtak Shariff
Joanna Ahmad
Save Greater Manchesters Green
Belt (SGMGB) - Rochdale Groups
Robert Kneale
Barbara Jones

	Paul Bolton Frank Shackleton Janine Lawford John Coupe Christine Mills Alex Richardson Linda Ratchford Sonia George Thomas George Diana Collins Rodney Collins Jo Wimbush Bamford Green Belt Action Group Margaret Upton Helen Illingworth Anne Ripley Nathan Brammeier John Worthy Edith Mills
JPA19.42	Susan Smith Catherine Hanna Grenville Evans Robert Aston Nicola Hudson Jeffrey Roberts Lesley Spencer David Flynn David Gibbs John Richardson
JPA19.45	Andrew Wales Simon Thomas James Bannon Susan Smith

	<p>Claire Bayman Daniel Jackson Desi Friel Elizabeth Bardsley Maureen Grundy Catherine Hanna John Williams Robert Aston Nicola Hudson Michael Pickering Rob Mclouglin Wendy Connolly Katrina Sartini Patricia Astbury Gabriela Sanderson Greg Taylor Pauline Massey Ian Robinson Rebecca Connolly Christopher Pearson Pamela Lea Sandra McManus Duncan Hopton Paul Bailey Sonia Wilson Heywood, Middleton and Rochdale Conservative Cllr's Georgia Ranson Sheila Unsworth Mel Fawcett</p>
JPA19.47	<p>Andrew Wales Simon Thomas James Bannon</p>

	<p>Susan Smith John Norbury Daniel Jackson Ian Smith Jane Hanna Lyn White Susan Smith Catherine Hanna Rob Mclouglin Wendy Connolly Angela Lutkevitch Katrina Sartini Rebecca Connolly Judith Wilkes Stephen Clark Afia Saeed Nick Lonergan David Sharples Julie Ranson Maria Murphy Philippa Madgin Ramsden</p>
JPA19.48	<p>Louise Poyning Andrew Drummond John Ripley John Norbury Paul Marshall Daniel Jackson Barry Lewis John Blackburn Ian Smith Angela Smith Colin Gibson Chris Houston</p>

Beryl Bulcock
Helen Bingham
Wendy Byrne
Ian Warrington
Sandra Geary
Andrew Alden
Donna Gallagher
Jane Hanna
Lyn White
Chris White
Susan Smith
Robert Hudson
Catherine Hanna
John Williams
Anne Shorrock
Emma Buckley
Jean Butler
Robert Aston
Michael Pickering
Rob Mclouglin
Wendy Connolly
Angela Lutkevitch
Gareth Garside
Katrina Sartini
Patricia Astbury
Gabriela Sanderson
Pauline Massey
Ian Robinson
John Langford
Jeffrey Roberts
Des Morris
Rebecca Connolly
Christine Hudson

Mark Golding
Marion Mills
Mark Golding
Judith Golding
Sandra McManus
Duncan Hopton
Judith Wilkes
Angela Marshall
Paul Bailey
David Armbrister
David Edmonds
Sonia Wilson
Farooq Azam
Afia Saeed
Kath Birchall
Judith Stott
Geoff Carter
Peter Forman
Katy Hoole
Mick Butterworth
Mark Brown
Robert Birkbeck
Julie Hargreaves
Mark Hargreaves
Daniel Hargreaves
Jeanette Warburton
Diane Robinson
Brian Bevan
Mel Fawcett
Andrew Nunns
Carolynn Brierley
David Gibbs
Olwen Stebbings

Sharon Eames
Andrea Hall
Norman Eames
Ian McCall
Sharon Eames
Lauren Easby
Claire Sunderland
Nigel Sarbutts
Joanna Ahmad
Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Robert Kneale
Carole Tuckley
Stephen Cohen
Lori Reid
Patricia Wolf
Ann White
Samuel Clarkson
Vivienne Clarkson
Suzanne Mather
David Mather
Janine Chapman
Sadaf Khan
Martin Bowe
George Trevor Steven Williams
Sylvia Rutter
John Coupe
Sarah Smith
Claire Thorpe
Russell Gill
Susan Cummings
Elaine Gill
Yvonne Eccles

Michael Davis
Linda Ratchford
James Turner
Robert Saunders
Stephen Garside
Margaret Wilcox
Sonia George
Rodney Collins
Graham Morris
Christine Coleman
Emma Wailes
Sarah Whittaker
Michelle Dixon
Lucy Wilkinson
Andy Wailes
Timothy O'Brien
Stephen Warburton
Michelle Kennedy-Lucas
Cliff Lucad
Cheryl Thorndyke
Ken Smith
Dorne Cloran
Craig Cloran
Sandra Margaret Walker
Lisa Bailey
Oliver Jones
Peter Drugan
Molly Drugan
Cooper Drugan
Jennifer Drugan
Christopher Noonan
Joanne Morris
Deborah Furber

	<p>Bamford Green Belt Action Group</p> <p>Vicky Harper</p> <p>Shelagh Funnell</p> <p>Margaret Upton</p> <p>Susan Chadwick</p> <p>Sudarat Hargreaves</p> <p>Kathleen Hargreaves</p> <p>Nadia Akhtar</p> <p>Geoff Gillan</p> <p>Robert Rawsthorne</p> <p>Michelle Garside</p> <p>Pamela Poole</p> <p>Linda Collins</p> <p>Stuart Poole</p> <p>Terence Collins</p> <p>John Worthy</p> <p>Barbara Lloyd</p> <p>Javaid Ahmad</p> <p>M R Hanna</p> <p>Stephen Hague</p> <p>Richard Gibbons</p> <p>Edith Mills</p> <p>Victoria Taylor</p> <p>Graham Taylor</p> <p>Ian Hill</p> <p>David Wrigley</p> <p>Patricia Sullivan</p> <p>Veronica Wilson</p> <p>Paul And Anna Blomfield</p> <p>Philip Bailey</p>
JPA19.51	<p>Barry Lewis</p> <p>Kirsty O'Brien</p> <p>Ian Smith</p>

Desi Friel
Angela Smith
Chris Houston
Wendy Byrne
David Troughton
Ian Warrington
Sandra Geary
Helen Jones
Anthony Pockney
Chris White
Robert Hudson
Susan Travis
John Williams
Anne Shorrock
Nicola Hudson
Rob Mclouglin
Neil Crook
Leigh Crook
Janet Taylor
Katrina Sartini
Virginia Newman
Patricia Astbury
Lynn Lovell
Jonathan Sudlow
Nicola Almond
Sandra McManus
George Waugh
Valerie Mcgrann
Kathryn Cotter
Elsie Hack
Judith Wilkes
Angela Marshall
Andrew Marshall

	<p>Heywood, Middleton and Rochdale Conservative Cllr's Kath Birchall Mark Brown Georgia Ranson Laura Barnes Julie Hargreaves Mark Hargreaves Daniel Hargreaves Diane Robinson Michael Cummings Olwen Stebbings Sharon Eames Norman Eames Ian McCall Sharon Eames Julie Ayton Mushtak Shariff Claire Sunderland Mark Iveson Andrew Friend Ian Geary Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Carole Tuckley Samuel Clarkson Linda Handley Vivienne Clarkson Philippa Madgin Ramsden Christine Mills Elaine Gill Edward Ahmad Alex Richardson</p>
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	<p>Louise Collins Carole Threlfall Sarah Whittaker Michelle Dixon Rachel Williams Ann Durante Christian Morris Lisa Bailey Lynne Spellacy Annabel Morris Christopher Noonan Joanne Morris Bamford Green Belt Action Group Margaret Roberts Vicky Harper Margaret Upton Vanessa Hobson Halina Clowes David Pennock Kathleen Hargreaves Mary Knowles Damian Carter-Raby John Worthy Veronica Wilson Lynne Hastings Lynne Hastings Jackie Copley Philip Bailey</p>
JPA19.53	<p>Paul Roebuck Susan Smith Claire Bayman Paul Marshall Daniel Jackson</p>

Barry Lewis
Desi Friel
Keith Smith
Angela Smith
Chris Houston
Helen Bingham
Wendy Byrne
Pamela Day
Jack Day
Jane Hanna
Lyn White
Leighan Beesley
Susan Harrington
Catherine Hanna
John Williams
Jean Butler
Robert Aston
Wendy Connolly
Neil Crook
Leigh Crook
barry corless
Stephanie Brady
Nicola Almond
Rebecca Connolly
Cy Talbot
Sandra McManus
Heywood, Middleton and Rochdale
Conservative Cllr's
Kath Birchall
Maria Murphy
Michael Cummings
Lauren Easby
Nigel Sarbutts

	<p>Carole Tuckley Lori Reid Samuel Clarkson Vivienne Clarkson Stephen Thorpe Susan Cummings David Baron Louise Collins Lucy Williamson Suzanne Gauge Steve Hughes Toby Miskiewicz Bamford Green Belt Action Group Vanessa Hobson Ryan Smith Patricia Sullivan</p>
JPA19.56	<p>Claire Bayman John Ripley John Norbury Barry Lewis Kirsty O'Brien Angela Smith Beryl Bulcock Helen Bingham Wendy Byrne Helen Jones Pamela Day Jane Hanna Elizabeth Bardsley Anthony Pockney Roy Grundy Susan Harrington Catherine Hanna</p>

Edward Artingstoll
John Williams
Anne Shorrocks
Robert Aston
Rob Mcloughlin
Wendy Connolly
Janet Taylor
Virginia Newman
John Garner
Lynn Lovell
Laxman Thakur
Jonathan Sudlow
Stephanie Brady
Gabriela Sanderson
Pauline Massey
Roy King
Lorraine Dewhurst
Nicola Almond
Rebecca Connolly
Richard Rothwell
Christopher Pearson
Gordon McGeechan
Marion Mills
Sandra McManus
Claire Rea
George Waugh
Valerie Mcgrann
Kathryn Cotter
Vivienne Cooper
Judith Wilkes
Paul Bailey
Enid Martini
David Edmonds

David Flynn
Stephen Clark
Dermot Garvey
Lynn Farrington
Afia Saeed
Pamela Harrington
Nick Lonergan
Katy Hoole
Ian Cochrane
Michael Parkins
Mark Brown
John Lonergan
Robert Birkbeck
Georgia Ranson
Laura Barnes
Julie Hargreaves
Mark Hargreaves
Sonia Smith
Daniel Hargreaves
Andrew Nunns
Angela Nunns
David Gibbs
Angus Robinson
Anthony Wicker
Sharon Eames
Norman Eames
Ian McCall
Sharon Eames
Julie Ayton
Claire Sunderland
Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups
Robert Kneale

Judith Brierley
Lori Reid
Barbara Jones
Paul Bolton
Samuel Clarkson
Vivienne Clarkson
Janine Chapman
George Trevor Steven Williams
Mary Collins
John Coupe
Christine Mills
Brian Robinson
David Hobson
Russell Gill
Elaine Gill
Yvonne Eccles
Michael Davis
Edward Ahmad
Linda Ratchford
Geoffrey Hargreaves
Diana Collins
Carole Threlfall
Emma Wailes
Thomas Hargreaves
Amy Mason
Julie Hill
Rachel Williams
Jo Wimbush
Sarah Cadell
Suzanne Gauge
Steve Hughes
Michelle Kennedy-Lucas
Cliff Lucad

Jonathan Preston
Ken Smith
Christian Morris
Christopher Morgan
Lisa Bailey
Oliver Jones
Emily Jones
Joanne Morris
Bamford Green Belt Action Group
Vicky Harper
Nathan Brammeier
Sudarat Hargreaves
Kathleen Hargreaves
Nadia Akhtar
Martin Furber
John Worthy
Barbara Lloyd
Richard Conlon
Peter B Wilson
David And Valerie Ternent
Michael and Elsie Purrett
Edith Mills
Cherry Hardiman
Graham Taylor
Ian Hill
David Wrigley
Kathryn Hilton
Patricia Crossley
Elizabeth Marie Shaw
Paul And Anna Blomfield
Lynne Hastings
Lynne Hastings
Philip Bailey

JPA19.63	Robert Aston Rob Mclouglin Lesley Spencer Katy Hoole Richard Oldfield Sharon Hopwood Michael Cummings Samuel Clarkson Vivienne Clarkson George Trevor Steven Williams Sandra Williams Christian Morris Neil Hickford Barbara Lloyd
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Respondents to PfE 2021 Policy JP Allocation 21 – Crimble Mill

Row	Respondent name(s)
Policy JPA21.2	Antony Crossley Anthony Pockney Angela Brown Lucy Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Paul Arden Michael Peachey Irene Peachey Paul Johnson Carole Heed Anthony Heed Debra Makin
Policy JPA21.4	John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helen Fearon Karen Towriss Paul Towriss Edward Ahmad Michael Peachey Paul Johnson Halina Clowes Gary Fieldhouse
Policy JPA21.6	Iain Brown Paul Arden Karen Towriss Michael Peachey Irene Peachey Carole Heed Anthony Heed

	Debra Makin
Policy JPA21.10	Iain Brown Anthony Pockney John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Linsey Rawlinson Steven Fieldhouse Irene Peachey Vicky Harper Michelle Tweedale Alison Fieldhouse M Tweedale Gary Fieldhouse Debra Makin
Policy JPA21.11	Angela Brown Karen Towriss Irene Peachey Vicky Harper Stephen Daly Gary Fieldhouse Lynne Hastings Greater Manchester Housing Providers
Policy JPA21.12	Anthony Pockney John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helen Fearon Claire Johnson Linsey Rawlinson Steven Fieldhouse Save Crimble Mill Greenbelt Group Paul rden Karen Towriss

	<p>Paul Towriss Irene Peachey Paul Johnson Gary Fieldhouse</p>
Policy JPA21.19	<p>Iain Brown Antony Crossley John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helen Fearon Claire Johnson Lucy Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Mike Ripley Nigel Morrell (Wolstenholme Fold Farm) Kaitlyn Stockport Michael Peachey Irene Peachey Simon Robertson Paul Johnson Tracy Raftery Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse Gary Fieldhouse Carole Heed Anthony Heed Lynne Hastings CPRE Debra Makin</p>

Policy JPA21.22	<p>Sam Pilling Iain Brown Anthony Pockney John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Helen Fearon Angela Brown Claire Johnson Lucy Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Steven Fieldhouse Karen Towriss Alex Richardson Michael Peachey Irene Peachey Paul Johnson Michelle Tweedale M Tweedale Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Debra Makin Marc O'Driscoll</p>
Policy JPA21.24	<p>Claire Johnson Lucy Johnson Linsey Rawlinson Steven Fieldhouse Karen Towriss Paul Towriss Irene Peachey Paul Johnson</p>

	<p>Colin Brown Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.25	<p>Tracy Doyle Antony Crossley Claire Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse Mike Ripley Karen Towriss Paul Towriss Michael Peachey Irene Peachey Paul Johnson Emma Joesbury</p>
Policy JPA21.26	<p>Tracy Doyle Sam Pilling Antony Crossley Anthony Pockney John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Steven Fieldhouse Karen Towriss Paul Towriss</p>
Policy JPA21.27	<p>Sam Pilling Andrew Drummond</p>

	<p>Iain Brown Anthony Pockney John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Claire Johnson Lucy Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse Mike Ripley Karen Towriss Paul Towriss Michael Peachey Irene Peachey Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Lynne Hastings Debra Makin</p>
Policy JPA21.31	<p>Iain Brown Ian Warrington Anthony Pockney Claire Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse</p>

	<p>Paul Arden Mike Ripley Karen Towriss Nigel Morrell (Wolstenholme Fold Farm) Michael Peachey Irene Peachey Paul Johnson Colin Brown Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.33	<p>Anthony Pockney Linsey Rawlinson Michael Peachey Paul Johnson Michelle Tweedale Alison Fieldhouse M Tweedale Carole Heed</p>
Policy JPA21.35	<p>Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Karen Towriss Michael Peachey Irene Peachey Vicky Harper Michelle Tweedale</p>

	<p>M Tweedale Sheila Robinson Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.36	<p>Iain Brown Anthony Pockney Claire Johnson Lucy Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Steven Fieldhouse Paul Arden Karen Towriss Paul Towriss Michael Peachey Irene Peachey Paul Johnson Emma Joesbury Michelle Tweedale Stephen Daly Alison Fieldhouse M Tweedale Lucy Fieldhouse Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.38	<p>Tracy Doyle Iain Brown John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)</p>

	<p>Claire Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse Paul Arden Mike Ripley Karen Towriss Paul Towriss Edward Ahmad Michael Peachey Irene Peachey Vicky Harper Emma Joesbury Michelle Tweedale Alison Fieldhouse M Tweedale Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.39	<p>Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse Michael Peachey Irene Peachey Michelle Tweedale Sheila Robinson Carole Heed</p>
Policy JPA21.40	<p>Iain Brown Steven Fieldhouse</p>

	<p>Paul Arden Michael Peachey Irene Peachey Paul Johnson Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse Gary Fieldhouse Carole Heed Anthony Heed Debra Makin</p>
Policy JPA21.44	<p>Tracy Doyle Iain Brown John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Angela Brown Claire Johnson Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Steven Fieldhouse Janine Lawford Kaitlyn Stockport Michael Peachey Irene Peachey Vicky Harper Emma Joesbury Anne McNally Christopher Horridge Michelle Tweedale Alison Fieldhouse M Tweedale Lucy Fieldhouse</p>

	<p>Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Debra Makin Marc O'Driscoll</p>
Policy JPA21.45	<p>Iain Brown John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Angela Brown Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Linsey Rawlinson Steven Fieldhouse Mike Ripley Janine Lawford Kaitlyn Stockport Michael Peachey Irene Peachey Vicky Harper Halina Clowes Emma Joesbury Tracy Raftery Christopher Horridge Colin Brown Michelle Tweedale Stephen Daly M Tweedale Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed</p>

Policy JPA21.50	<p>John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's)</p> <p>Lucy Johnson</p> <p>Steven Fieldhouse</p> <p>Irene Peachey</p> <p>Vicky Harper</p> <p>Halina Clowes</p> <p>Stephen Daly</p> <p>Gary Fieldhouse</p>
Policy JPA21.56	<p>Tracy Doyle</p> <p>Iain Brown</p> <p>Antony Crossley</p> <p>Anthony Pockney</p> <p>Angela Brown</p> <p>Claire Johnson</p> <p>Lucy Johnson</p> <p>Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups</p> <p>Steven Fieldhouse</p> <p>Paul Arden</p> <p>Karen Towriss</p> <p>Paul Towriss</p> <p>Nigel Morrell (Wolstenholme Fold Farm)</p> <p>Edward Ahmad</p> <p>Alex Richardson</p> <p>Michael Peachey</p> <p>Irene Peachey</p> <p>Paul Johnson</p> <p>Vicky Harper</p> <p>Emma Joesbury</p> <p>Christopher Horridge</p> <p>Colin Brown</p>

	<p>Michelle Tweedale Stephen Daly Alison Fieldhouse M Tweedale Lucy Fieldhouse Sheila Robinson Gary Fieldhouse Carole Heed Anthony Heed Lynne Hastings Debra Makin</p>
Policy JPA21.67	<p>John Taylor (Heywood, Middleton and Rochdale Conservative Cllr's) Ian Warrington Save Crimble Mill Greenbelt Group Mike Ripley Nigel Morrell (Wolstenholme Fold Farm) Michael Peachey Irene Peachey Simon Robertson Tracy Raftery Debra Makin</p>

Respondents to PfE 2021 Policy JP Allocation 22 – Land North of Smithy Bridge

Row	Respondent name(s)
Policy JP22.3	<p>Susan Bishop Wardle and West Littleborough Conservative Cllrs Heywood, Middleton and Rochdale Conservative Cllr's David Hill Brian Chicot Violet Davies Sharon Lowe Leanne Backer Angela Clegg Kathryn Ames Barry Hazell-Scott Barbara Hazell-Scott Jenny Walker Anthony Tattersall Jacqueline Barber Tracy Raftery</p>
Policy JP22.4	<p>Paul Roebuck Aaron Jones Sarah Berry Susan Bishop Brian Chicot Brian Taylor Violet Davies Leanne Backer Amanda Parker Julie Leonard Barry Hazell-Scott Barbara Hazell-Scott</p>

	<p>Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall Tracy Raftery</p>
Policy JP22.7	<p>Paul Roebuck Aaron Jones Margaret Booley Wardle and West Littleborough Conservative Cllrs Heywood, Middleton and Rochdale Conservative Cllr's Jane Rothwell Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Janine Conway Brian Taylor Jennifer Barlow Violet Davies Leanne Backer Kathryn Ames Andrew Patker Jenny Walker Anthony Tattersall Dave and Jill Greenwood</p>
JP22.22	<p>Aaron Jones Victoria Turner Margaret Booley Sarah Berry Jean Markham Susan Bishop Wardle and West Littleborough Conservative Cllrs</p>

	<p>Angela Walker Heywood, Middleton and Rochdale Conservative Cllr's David Hill Jane Rothwell Brian Chicot Brian Taylor Rebecca Crabtree Jennifer Barlow Violet Davies Sharon Lowe Edward Ahmad Angela Clegg Barry Hazell-Scott Barbara Hazell-Scott Jenny Walker Jacqueline Barber Tracy Raftery</p>
Policy JP22.44	<p>Jeremy May Margaret Booley Joanne Coffey Wardle and West Littleborough Conservative Cllrs Heywood, Middleton and Rochdale Conservative Cllr's David Hill Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Brian Taylor Violet Davies Sharon Lowe Edward Ahmad Michael Keeley</p>

	Jenny Walker Yvonne Leach Jacqueline Barber
JP22.45	Margaret Booley Jean Markham Susan Bishop David Hill Brian Taylor Angela Clegg Julie Leonard Jenny Walker Anthony Tattersall Jacqueline Barber
JP22.48	Aaron Jones Victoria Turner Margaret Booley Sarah Berry Susan Bishop Heywood, Middleton and Rochdale Conservative Cllr's Brian Chicot Brian Taylor Rebecca Crabtree Violet Davies Nigel Morrell Sharon Lowe Leanne Backer Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall
JP22.52	Paul Roebuck Aaron Jones

	<p>Margaret Booley Sarah Berry Jean Markham Susan Bishop Wardle and West Littleborough Conservative Cllrs Angela Walker David Hill Jane Rothwell Save Greater Manchesters Green Belt (SGMGB) - Rochdale Groups Brian Taylor Rebecca Crabtree Jennifer Barlow Graham Roberts Violet Davies Sharon Lowe Leanne Backer Angela Clegg Kathryn Ames Barry Hazell-Scott Barbara Hazell-Scott Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group Yvonne Leach Anthony Tattersall Jacqueline Barber</p>
Policy JP22.59	<p>Paul Roebuck Jeremy May Aaron Jones Victoria Turner Margaret Booley</p>

	Sarah Berry
	Jean Markham
	Wardle and West Littleborough
	Conservative Cllrs
	Heywood, Middleton and Rochdale
	Conservative Cllr's
	Jennifer Barlow
	Violet Davies
	Leanne Backer
	Angela Clegg
	Amanda Parker
	Barry Hazell-Scott
	Barbara Hazell-Scott
	Jenny Walker
	Smithy Bridge & Littleborough Save
	the Green Belt Group
	Anthony Tattersall
	Jacqueline Barber

Respondents to PfE 2021 Policy JP Allocation 24 – Roch Valley

Row	Respondent name(s)
JPA 24.5	<p>Marc O'Driscoll Paul Roebuck Aaron Jones Margaret Booley Jean Markham Angela Walker Heywood, Middleton and Rochdale Conservative Cllr's Peter Nightingale Sharon Lowe Leanne Backer Lindsay Earnshaw Anthony Tattersall Tracy Raftery</p>
JPA 24.8	<p>Paul Roebuck Aaron Jones Victoria Turner Jason Turner Jean Markham Susan Bishop Sharon Lowe Leanne Backer Angela Clegg Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall</p>
JPA 24.24	<p>Marc O'Driscoll David Hill Jane Rothwell</p>

	<p>Peter Nightingale Sharon Lowe Leanne Backer Jenny Walker Smithy Bridge & Littleborough Save the Green Belt Group Anthony Tattersall</p>
JPA 24.41	<p>Paul Roebuck Victoria Turner Jason Turner David Hill Peter Nightingale Janine Lawford Jennifer Barlow Smithy Bridge & Littleborough Save the Green Belt Group Jacqueline Barber</p>
JPA 24.59	<p>Marc O'Driscoll Victoria Turner Jason Turner Jean Markham Angela Walker David Hill Brian Taylor Sharon Lowe Edward Ahmad Angela Clegg Jenny Walker Anthony Tattersall</p>
JPA 24.63	<p>Angela Walker David Hill Jane Rothwell Janine Lawford</p>

	Jennifer Barlow
	Sharon Lowe
	Angela Clegg
	Kathryn Ames
	Jenny Walker
	Smithy Bridge & Littleborough Save the Green Belt Group
	Anthony Tattersall
	Jacqueline Barber