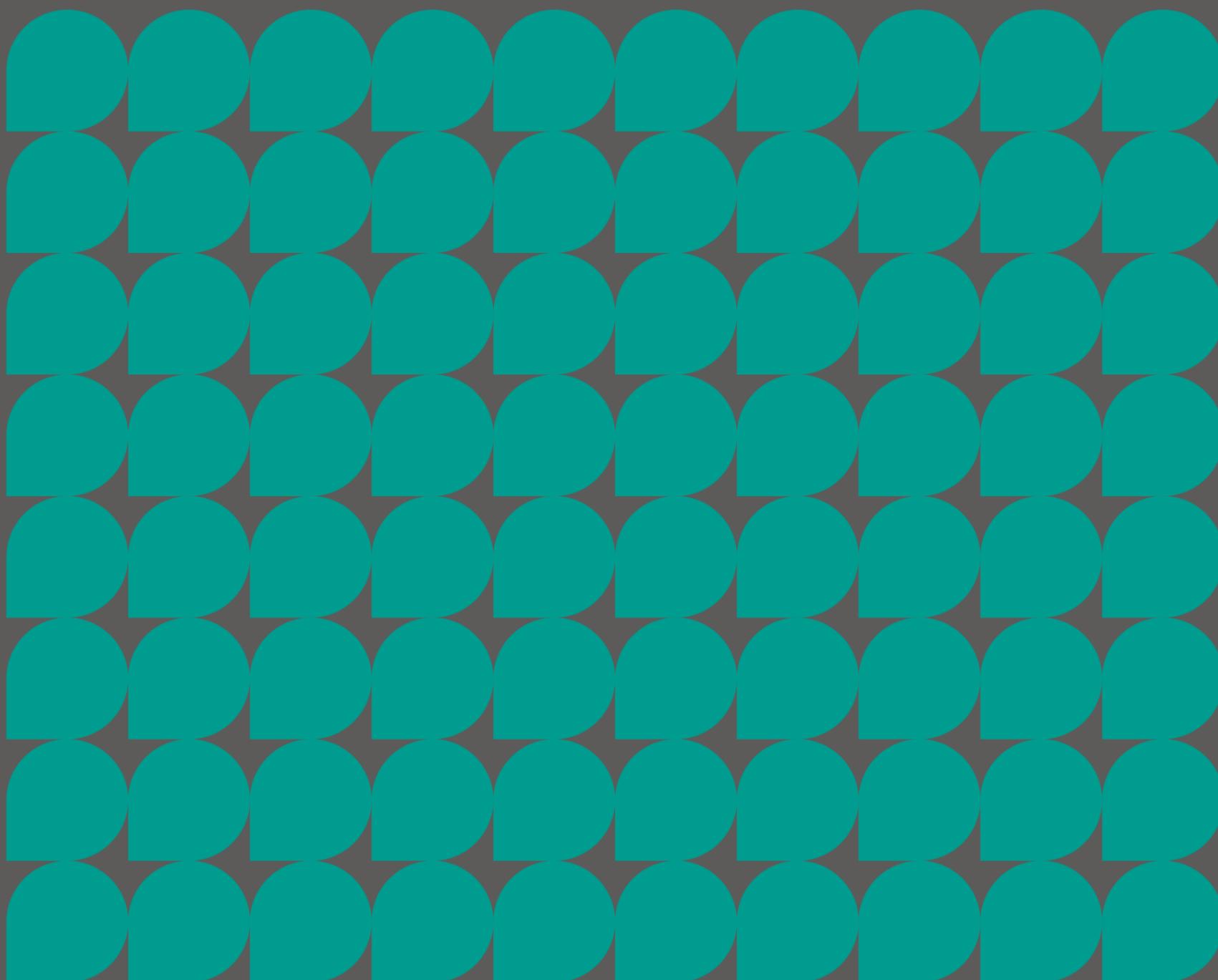


Places for Everyone

Allocations: Tameside Issues Summary

February 2022



Chapter 11 – Site Allocations (Tameside)

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

PfE 2021 Policy JP Allocation 30 Ashton Moss West

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Principle and or scale of development		
JPA30.1	General objection to the proposed development.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the Plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , is reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore no change to the Plan is considered as necessary.	Lee Mountney Jacqueline Charnock Vicky Harper Ann Guilfoyle Christopher Harper Wolstenholme Fold Farm Margaret Plant Martin Rigby Save Tameside Green Belt Janet Howarth Sarah Burlinson Paul Charlesworth Roy Ashworth CPRE
JPA30.2	The site should be used to action the Muse development plan for a golf course and football pitches following completion of the leisure development to the south.	Previous consent for such uses are acknowledged within the Ashton Moss West Allocation Topic Paper [10.08.11] , see chapter 6, however permission has not been implemented. Therefore, no change to the Plan is considered as necessary.	Jacqueline Charnock John Hampson Roy Ashworth
JPA30.3	The site is unsustainable.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the Plan’s Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. In addition, the Plan has been	Vicky Harper Christopher Harper

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		subject to Integrated Assessment via the GMSF Scoping Report 2021 [02.01.01] , GMSF Main Report 2020 [02.01.02] and GMSF Addendum [02.01.05] . Therefore no change to the Plan is considered as necessary.	
JPA30.4	The site represents developer greed.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Ashton Moss West has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the Plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. In addition, Planning Guidance identifies that a landowner should be able to make a minimum return at which they would be willing to sell their land. A stage two viability appraisal [03.03.04] has been undertaken for the site, as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11] , chapter 25, and the site shown to return a positive residual value. Therefore no change to the Plan is considered as necessary.	Vicky Harper
JPA30.5	The proposal cannot be achieved within the plan timescale. The Council are already delayed in submitting the separate planning application for Godley Green.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. a stage two viability appraisal [03.03.04] has been undertaken for the site as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11] , chapter 25, and the site shown to return a positive residual value. Policy JPA30 identifies that detailed phasing of development on the site would respond to and form part of the masterplan considerations, developed in consultation with the Council, local community and other appropriate stakeholders. Initial consideration of potential phasing is set out within the Ashton Moss West Allocation Topic Paper [10.08.11] , paragraph 26. Therefore no change to the Plan is considered as necessary. The Council as Local Planning Authority is in receipt of a planning application for Godley Green. Its application reference number is 21/01171/OUT.	Andrea Colbourne Phil Chadwick
JPA30.6	As the area around the former Snipe Colliery, A635 and Lord Sheldon Way is extensively developed for non food retail and leisure developments it appears only appropriate that this remainder well reasoned parcel of land and largely despoiled area is logically similarly allocated. Ashton Moss as a whole is viewed as a Gateway to Ashton. Site will	Support for the proposed allocation is noted. These locational qualities are identified within the Tameside Inclusive Growth Strategy and the Ashton Moss West Allocation Topic Paper [10.08.11] .	Arqiva Ltd Frank Gradwell Alex Gradwell-Spencer Stayley Developments Limited

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	serve as a major addition to an already successful trading site.		
JPA30.7	The site has a single majority primary landowner and secondary adjacent landowner both of which are supportive.	Support for the proposed allocation is noted.	Arqiva Ltd Stayley Developments Limited
JPA30.8	Fully supportive in principle of the policy, the site being allocated and that justification exists for the site's allocation as a strategic employment site and release from the Green Belt.	Support in principle for the proposed allocation is noted.	Arqiva Ltd Stayley Developments Limited
	Housing		
JPA30.9	Building new homes on the Green Belt is fundamentally wrong and will not solve the housing market crisis. The proposal does not support the objective for sustainable affordable housing and there is concern that the proposed residential development on this site will not provide homes for households on low incomes and first time buyers.	While the comments are noted, the site, as set out within the proposed policy, has been identified for employment uses and does not propose residential development. It is therefore not able to support the delivery of housing and therefore no change to the policy is considered as necessary. However, it should be noted that PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist.	Janet Howarth Vicky Harper Andrea Colbourne Phil Chadwick
JPA30.10	The housing target should be lowered until all alternative sites have been explored with the exception of Green Belt sites.	The comment is not considered relevant to Policy JPA30 and the matter is addressed elsewhere.	Andrea Colbourne Phil Chadwick
JPA30.11	Despite the vision for the Plan setting out that growth will be directed toward the northern and most deprived boroughs in the conurbation, insufficient housing land is being planned for within Tameside and additional allocations are required to bolster the supply and offer greater flexibility. The	No change considered necessary. In line with NPPF, the Plan seeks to promote the development of brownfield land within the urban area and to use land efficiently. By working together the nine districts have been able to maximise the supply of the brownfield land at the core of the conurbation and limit the extent of Green Belt 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	Taylor Wimpey

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	existing claimed supply is overly optimistic and not robust.	<p>out in the Growth and Spatial Options Paper [02.01.10] and recent delivery rates demonstrate that the relevant targets within this area are deliverable.</p> <p>Details of the housing land supply can be found in the Housing Topic Paper [06.01.03]. As the Plan seeks to promote the development of brownfield land, a significant amount of the supply identified is in some of the more challenging areas of the conurbation. As stated in the Housing Topic Paper [06.01.03], an appropriate buffer has been applied to the land supply to address this and other issues such as uncertainties arising as a result of Covid-19 and Brexit. Therefore no change to the Plan is considered as necessary.</p>	
JPA30.12	Housing need ignores impacts of Brexit, covid and should use the latest 2018 ONS population predictions. Covid also impacts working patterns.	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere. However, 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 PfE. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . Therefore no change to the Plan is considered as necessary.	Andrea Colbourne Phil Chadwick
JPA30.13	How will housing delivery be maintained when several authorities have consistently failed to meet targets.	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere.	Andrea Colbourne Phil Chadwick
JPA30.14	<p>The policy should be amended to allow flexibility for an element of the site to be for residential if needed to support deliverability, parcel to the west being most appropriate.</p> <p>This would also allow for a sensitive design to avoid potential issues of sighting employment uses adjacent to existing residential development.</p>	<p>No change is considered necessary. The use classes considered appropriate are set out within JPA30 policy point 1. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a stage two Strategic Viability Appraisal [03.03.04] has been undertaken for the site as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11], chapter 25, and the site shown to return a positive residual value, therefore no further flexibility is considered needed.</p> <p>JPA30 policy point 2 recognises points regarding design including the need for a comprehensive masterplan, phasing strategy and design code developed through engagement with the local community, Council and other appropriate stakeholders to ensure design solutions are sensitive to adjacent existing residents.</p> <p>JPA30 policy point 7 recognises the need to ensure the character of, and interface between, new and existing development, including surrounding residential dwellings and gardens are sensitively designed and acknowledged by development proposals. Therefore no change is considered as necessary.</p>	Arqiva Ltd Stayley Developments Limited Michael Hullock

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	Employment and Economy		
JPA30.15	Site will result in significant improvements to the local economy and employment statistics and is adjacent to existing Ashton Moss Business Park which is fully occupied.	Noted. Chapter two of the Ashton Moss West Allocation Topic Paper [10.08.11] acknowledges this potential and JPA30 policy point 9 recognises the need to ensure employment, education and training opportunities are available for residents within the local area both through construction phases and upon completion.	Stayley Developments Limited
JPA30.16	Is there really a need for more commercial/office space with more and more people working at home.	<p>As detailed in Chapters 1, 6 and 7 of the PfE Plan, two assessments of the potential impacts of Covid-19 and Brexit on the economy were carried out, initially in 2020 and again in 2021. Both assessments concluded that there was insufficient evidence to amend the assumptions underpinning the PfE Plan. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03].</p> <p>Unlike for housing need, there is no standard methodology for calculating employment land need. However, as detailed in the paper Employment Land Needs in Greater Manchester [05.01.02] the approach adopted is considered a robust, widely accepted methodology. Chapter two of the Ashton Moss West Allocation Topic Paper [10.08.11] acknowledges the challenges of the boroughs employment land supply and need for the site to supplement this and JP-Strat 6 identifies the need for a significant increase in the competitiveness of northern areas. Therefore no change to the Plan is considered as necessary.</p>	Darryl Myers John Hampson
JPA30.17	The employment delivered, because it is targeted for industry, will be dirty and inappropriate when located next to a peat moss. The site should also not be used for empty warehouses. There is risk that what is delivered will not be highly skilled employment such as tech, research and development needed and be of a low skilled nature.	<p>The use classes considered appropriate are set out within JPA30, policy point one does not identify the site for warehousing uses.</p> <p>Policy JPA30 reasoned justification, paragraph 11.268, identifies the site as being a major opportunity to deliver high quality employment floorspace in support of the Tameside Inclusive Growth Strategy within areas of economic strength and key growth sectors such as life sciences, health technologies, advanced manufacturing and materials science/fabrication.</p> <p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Preliminary Ecological Appraisal [10.08.01] has been undertaken, considering existing habitats to establish an ecological baseline for future monitoring. It acknowledged that while not designated at any level for its nature conservation value the site does support priority habitats and species but that currently there are no known ecological constraints so important as to preclude allocation, as summarised within section 18 of the Ashton Moss West Allocation Topic Paper [10.08.11]. The appraisal recommended further surveys are conducted at the application stage and that ecological mitigation and compensation will likely</p>	Jacqueline Charnock Paul Charlesworth

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		be needed. PA 30 policy point 14 recognises key landscape and ecological features, including, trees, watercourses and ponds. Therefore no change to the Plan is considered as necessary.	
JPA30.18	A partner should be identified for the employment/industry provision.	It is not considered this is a matter within the scope of the Plan and therefore no change is considered as necessary.	Andrea Colbourne Phil Chadwick
JPA30.19	A threshold of 160,000sqm is unnecessarily restrictive as the site may have greater development potential. Policy wording should be adjusted to reflect.	JPA policy point one identifies the requirement to deliver 'around' 160,000 square metres of floorspace. The term 'around' is considered to allow sufficient flexibility should the site have a greater or lesser degree of development potential following further detailed assessment at the application stage. No change to the policy is considered as necessary.	Arqiva Ltd Stayley Developments Limited
JPA30.20	The intended uses are considered broadly appropriate given the sites location, accessibility. However B8 uses should be included given proximity to SRN and adjacent Junction 23 of the M60. There needs to be ability to maximise the sites appeal to occupiers and flexibility allowed to cater for market demand fluctuations.	Noted, it is welcomed that the intended uses are considered appropriate. These are set out within JPA policy point one which identifies floorspace should primarily be within the E(g)(ii) - Research and Development, E(g)(iii) - Light and Industrial and B2 - General Industrial use classes. The range of uses are considered to allow sufficient flexibility to cater for changes in market demand fluctuations. Therefore no change is considered as necessary to the policy.	Arqiva Ltd Stayley Developments Limited
JPA30.21	It is agreed that Tameside has a shortage of larger available employment sites in the borough.	Noted. These challenges are acknowledged within chapter two of the Ashton Moss West Allocation Topic Paper [10.08.11] , in particular the point relating to an absence of larger sites within the existing supply.	Stayley Developments Limited
	Green Belt		
JPA30.22	Allocations should not contradict Green Belt policy which is seen as the easy option for development. There is no justification to build on greenbelt which is sacred and exceptional circumstances do not exist for deletions or additions to the Green Belt which should keep towns separate from one another.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. An appropriate Green Belt Assessment has been undertaken reflected within the Green Belt topic paper [07.01.25] , and Ashton Moss West Allocation Topic Paper [10.08.11] which set out the strategic and local case for exceptional circumstances which are considered to exist.	Paul Roebuck Lee Mountney Jacqueline Charnock Andrea Colbourne Phil Chadwick Kim Scragg Margaret Plant Anne Keighley Save Tameside Green Belt

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	If Ashton moss is built on, it will join Ashton, Droylsden, Audenshaw together as urban sprawl.	Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Therefore no change to the Plan is considered as necessary.	Frances Rawsthorne Lee Rawsthorne Georgia Rawsthorne Joanne Rawsthorne Peter Stanyer Ian Potts
JPA30.23	It is agreed that exceptional circumstances and opportunities for net gain exist.	Noted.	Stayley Developments Limited
JPA30.24	The site selection process is unclear with no explanation as to why some call for sites are excluded.	The site selection process and methodology is set out in the Site Selection Background paper [03.04.01] and associated appendices. No change to the Plan is considered as necessary.	Andrea Colbourne Phil Chadwick
JPA30.25	The site is considered to meet with the site selection criteria.	Noted.	Stayley Developments Limited
JPA30.26	The area to the north of the railway line is actively farmed land preserving the green space between Tameside and Oldham as Littlemoss and Daisy Nook comprising the river valley. The retention of that grassed and wooded area which has been a traditional leisure facility for Failsworth and Bardsley is of great local value and any attempt at incursion and reversion to the pre 2016 GMSF position should be strongly resisted.	Noted. Land to the north of the rail line does not form part of the JPA30 allocation or any other PfE allocation and its designation as Green Belt remains unchanged. No change to the Plan is considered as necessary.	Frank Gradwell Alex Gradwell-Spencer
JPA30.27	The area to the north of the railway line at Cross Lane Littlemoss should be re-included as part of the Ashton Moss West Site to meet Tameside's housing needs over the plan period. Its inclusion would also support provision of the station as identified in the policy.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and no change is considered necessary. Ashton Moss West has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.	Taylor Wimpey

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JPA30.28	The site is a logical and well reasoned parcel which has strong boundaries, rail line to the north, M60 to the east and existing residential to the west.	Noted.	Arqiva Ltd
	Brownfield		
JPA30.29	<p>Brownfield land should be prioritised for the development of new homes and employment where this would not conflict with other policies in the NPPF.</p> <p>Demand for new homes and employment land should be confined to existing brownfield sites given that there are sufficient sites to meet need with a number of alternative brownfield sites identified for redevelopment.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum.</p> <p>In addition, the Council maintains an up to date Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register to support the identification of such opportunities. Therefore no change to the Plan is considered as necessary.</p>	<p>Andrea Colbourne Phil Chadwick Kim Scragg Michael Hullock Paul Roebuck The Wildlife Trusts</p>
JPA30.30	New businesses should be encouraged to locate within town centres, utilise empty property and brownfield land in the first instance and redevelop and invest in existing industrial estates.	<p>The NPPF defines certain uses as main town centre uses and directs them toward town centres through application of the sequential and impact tests. Additionally, the Tameside Inclusive Growth Strategy aims to make the borough's identified centres, hubs for living, culture, employment and services supporting a sustainable retail sector. The Council also maintains an up to date Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register to support the identification of such brownfield opportunities.</p> <p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. Therefore no change to the Plan is considered as necessary.</p>	<p>Gillian Lonergan Andrea Colbourne Phil Chadwick Michael Hullock Darryl Myers John Seddon</p>
JPA30.31	Not all brownfield land has been identified on the Brownfield Land Register.	The Council maintains an up to date Brownfield Land Register and has an open approach that allows the proposal of new sites. No additional sites have been suggested for inclusion on the register that are	CPRE

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		considered appropriate or not already identified. When new sites are suggested, these can be considered for inclusion in future updates. No change to the Plan is considered as necessary.	
	Transport – Highways / Public Transport / Cycling / Walking		
JPA30.32	<p>Should development of the site for employment and/or residential come forward, transport remains an area of concern.</p> <p>Employment development will have negative impact on traffic and highways infrastructure, particularly at peak times and weekends around Manchester Road, M60, M67 and into Ashton and Droylsden and congestion will raise air pollution levels.</p> <p>There will also be a negative impact on neighboring property during the construction phase.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Transport Locality Assessment [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. Policy point 8 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that significant adverse affects of the allocation can be appropriately ameliorated with final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the Ashton Moss West Allocation Topic Paper [10.08.11].</p> <p>Policy JP-S 6 Clean Air, sets out a comprehensive range of measures that will be taken to support improvements in air quality. Future applications will require a range of assessment in accordance with up to date guidance as set out in JP-S 6 and policy points 2, 3 and 4 in particular. Therefore no change to the Plan is considered as necessary.</p>	<p>Jacqueline Charnock Vicky Harper Christopher Harper Andrea Colbourne Phil Chadwick Colin Walters Darryl Myers Paul Roebuck</p>
JPA30.33	<p>The indicative access arrangements are agreed with and these would not prove prohibitive to attracting investment.</p> <p>Suggested amended policy wording to reflect need for two access points.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Transport Locality Assessment [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] has been undertaken to assess impact on highway infrastructure and set out potential mitigation options and indicative access arrangement to ensure the requirements of national policy are met and the allocation can be delivered.</p> <p>JPA30 policy point 10 requires the provision of access into the site from the A6140 Lord Sheldon Way and Transport Assessment in accordance with Policy JP-C7 will be required at the application stage. Whilst the proposed wording change could improve clarity of the policy, it is not considered a soundness issue, therefore no change is considered as necessary.</p>	<p>Arqiva Ltd Staley Developments Limited</p>
JPA30.34	Active travel routes and public transport are needed to improve access to daisy nook country park.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PA30 policy point 17 requires development be designed to enhance connectivity to existing communities in the locality alongside key assets such as schools, cycle and walking routes, public transport	CPRE

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		services and Daisy Nook Country Park. An assessment of potential opportunities to enhance beneficial use of retained Green Belt has been undertaken [07.01.12] and enhanced connectivity and permeability is further required by policy JP-C 7. Therefore no change to the Plan is considered as necessary.	
JPA30.35	Site is considered well located in respect of various modes of travel.	Noted. The existing provision of public transport options are set out within the Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and summarised in chapter 10 of the Ashton Moss West Allocation Topic Paper [10.08.11] . JPA 30 policy point 11 also requires land be set aside adjacent to the railway for potential provision of a future rail station. No change is considered as necessary.	Stayley Developments Limited
JPA30.36	At this stage, it is WSP's opinion that the transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements.	<p>The Transport Locality Assessments - Tameside allocations document [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] provide detailed information on the nature, scale and timing of infrastructure requirements at the Strategic Road Network (SRN). The report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in [09.01.01] GM Transport Strategy 2040 and [09.01.02] GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working alongside National Highways to prepare a further piece of work examining a "policy-off/worst-case" impact on the SRN to help address National Highways remaining concerns.</p>	National Highways
	Physical and social Infrastructure, utilities		
JPA30.37	Concern that existing local infrastructure and amenities are at breaking point and will not be able to support an increase in demand resulting from the proposed development.	Comments are noted. The site has been identified for employment uses only and does not propose residential development. JPA30 policy point 8 requires the provision of developer contributions toward transport and other infrastructure as deemed appropriate to mitigate impact through the application process and section D of the Ashton Moss West Allocation Topic Paper [10.08.11] details this further. Additionally, policy JP-D 2 states that new development must be supported by the necessary infrastructure and mitigation as appropriate will be provided. Therefore no change to the Plan is considered as necessary.	Vicky Harper Andrea Colbourne Phil Chadwick Janet Howarth
JPA30.38	The Plan needs to identify how infrastructure will be paid for.	A number of policies in the Plan provide a sufficient policy framework to address this matter, Policy JP-D 2 states that new development must be supported by the necessary infrastructure, including where	Andrea Colbourne Phil Chadwick

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		appropriate green spaces, schools and medical facilities. The Plan needs to be read as a whole and therefore no change is considered necessary.	
JPA30.39	Although the site's proximity to Tameside Council Offices and colleges has been acknowledged there remains concern that existing social infrastructure including hospitals, GP surgeries, healthcare providers, schools and public services are over stretch/ oversubscribed and will not be able to support an increase in demand resulting from the proposed development.	Comments are noted, the site has been identified for employment uses only and does not propose residential development. JPA30 policy point 8 requires the provision of developer contributions toward transport and other infrastructure as deemed appropriate to mitigate impact through the application process. Section D of the Ashton Moss West Allocation Topic Paper [10.08.11] provides further detail. Additionally, policy JP-D 2 states that new development must be supported by the necessary infrastructure and mitigation as needed will be provided. Therefore no change to the Plan is considered as necessary.	Jacqueline Charnock Andrea Colbourne Phil Chadwick
JPA30.40	Environmental – Green Infrastructure, Biodiversity, Open Space, Recreation		
JPA30.41	Allocation site noted for being a free, accessible and mature greenspace which provides a habitat for diverse range of wildlife and a recreational function for the local community. Development of site would have a negative impact on mature natural environment with loss of biodiversity, habitat and ecology (wildlife/ animals/birds/plants/ protected species). Habitats and wildlife are starting to recover following the development of the M60 and Ashton Moss. The majority of the allocation could potentially be classified as Open Mosaic Habitat, a Priority Habitat and Habitat of Principal Importance (HPI) under the Natural Environment and Rural Communities	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist. Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Preliminary Ecological Appraisal [10.08.01] has been undertaken, considering existing habitats to establish an ecological baseline for future monitoring. It acknowledged that while not designated at any level for its nature conservation value the site does support priority habitats and species but that currently there are no known ecological constraints so important as to preclude allocation, as summarised within section 18 of the Ashton Moss West Allocation Topic Paper [10.08.11] . The appraisal recommended further	Emma Rossington-Otter Jacqueline Charnock Vicky Harper Gillian Lonergan Andrea Colbourne Phil Chadwick Paul Charlesworth Fiona Andrew John Hampson Roy Ashworth John Seddon Ian Potts Christopher Harper The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	<p>(NERC) Act 2006. And other examples of potential priority habitats including hedgerows and ponds are also located within the site. All these areas should be excluded from the allocation in order to avoid harm to Biodiversity.</p> <p>There is evidence to suggest that Ashton Moss supports Birds of Conservation Concern (BoCC) red listed birds such as curlew, skylark, linnet and lapwing utilise the site. In addition, priority species including wall butterfly, hedgehog, bats and black poplar have also been recorded at the site. measures will be required to mitigate the impacts on these important species.</p>	<p>surveys are conducted at the application stage and that ecological mitigation and compensation will likely be needed.</p> <p>In addition, JPA30 policy points 12, 13, 14, 15, 16 17 and 18 set out a range of site specific policy measures in relation to green infrastructure and policy JP-G 9 requires appropriate assessment be undertaken at the application stage and mitigation or compensation be provided as needed. Therefore no change to the Plan is considered as necessary.</p>	
JPA30.42	Allocation will contradict greenspace strategy and does not follow PfE objective 8.	<p>The Plan needs to be read as a whole and PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.</p>	<p>Jacqueline Charnock Paul Charlesworth Paul Roebuck</p>

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and Policy JPA30 recognises existing formal and informal recreational routes through policy points 12, 13, 14, 15, 16 17 and 18, requiring development of the site to incorporate a range of green infrastructure and accessibility mitigation as appropriate. Therefore, no change to the Plan is considered as necessary.	
JPA30.43	<p>Site is grade 2 agricultural land and includes farms, fields and stables rich in underlying deep peaty soils which should be safeguarded and restored in line with Draft GMSF Policy GM-G 10 Net Gain Enhancement of Biodiversity Point 8.</p> <p>It's allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration. Additionally peat is a valuable store of carbon and a valuable climate change asset that should not be damaged.</p>	<p>The Plan should be read as a whole as policy JP-G 9 at paragraph 8.53 recognises that while development would ordinarily be directed away from valuable soils, given the overall scale of development that needs to be accommodated, a limited amount of development on higher grade agricultural land is necessary.</p> <p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Preliminary Geotechnical Report [10.08.04] and Factual Report on Ground Investigation [10.08.03] has been undertaken which demonstrate that whilst historically the site has been recorded as grade 2 or 3 agricultural land due to underlying peat, this has been subject to the onsite placement of materials primarily associated with construction of the M60 Motorway. Further detail is provided within section 12 of the Ashton Moss West Allocation Topic Paper [10.08.11] and policy JPA30 recognises the need for development proposals to be informed by a detailed earthworks and remediation strategy. Therefore, no change to the Plan is considered as necessary.</p>	<p>CPRE Jacqueline Charnock Fiona Andrew The Wildlife Trusts Andrea Colbourne Phil Chadwick</p>
JPA30.44	The agricultural land classification for the site is considered out of date as the site has been overlain by place material, developed or ground levels altered.	Noted. A Preliminary Geotechnical Report [10.08.04] and Factual Report on Ground Investigation [10.08.03] has been undertaken which demonstrate that whilst historically the site has been recorded as grade 2 or 3 agricultural land due to underlying peat, this has been subject to the onsite placement of materials primarily associated with construction of the M60 Motorway. Further detail is provided within section 12 of the Ashton Moss West Allocation Topic Paper [10.08.11]. No change to the Plan is considered as necessary.	Stayley Developments Limited
JPA30.45	There is potential for emissions arising as a result of peat extraction which may potentially be required to facilitate construction.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Preliminary Geotechnical Report [10.08.04] and Factual Report on Ground Investigation [10.08.03] has been undertaken which demonstrate underlying peat which has since been overlain by placed materials primarily associated with construction of the M60 Motorway. Further detail is provided within section 12 in relation to Ground Conditions, of the Ashton Moss West Allocation Topic Paper [10.08.11]. Policy JPA30 point 3 requires delivery of the site to be informed by a detailed earthworks and remediation strategy Therefore no change to the Plan is considered as necessary.	The Wildlife Trusts

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JPA30.46	The exact area and depth of peat that remains at Ashton Moss needs to be established as a matter of urgency and factored into the GM Carbon Neutrality targets and budgets.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Preliminary Geotechnical Report [10.08.04] and Factual Report on Ground Investigation [10.08.03] has been undertaken which demonstrate underlying peat which has since been overlain by placed materials primarily associated with construction of the M60 Motorway. Further detail is provided within section 12 in relation to Ground Conditions, of the Ashton Moss West Allocation Topic Paper [10.08.11]. Therefore no change to the Plan is considered as necessary.	The Wildlife Trusts
JPA30.47	Existing ponds should not be removed and the wetland such as the moss is a research priority.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Policy JPA30 identifies that development of the site will be required to protect and enhance key landscape and ecological features, including trees, watercourses and existing ponds. Indicative concept plans within Appendix 5 of the Ashton Moss West Allocation Topic Paper [10.08.11] exclude existing ponds from the indicative development area. Therefore no change to the Plan is considered as necessary.	Jacqueline Charnock Paul Charlesworth
JPA30.48	The site is an important place for exercise, provides access to the countryside and recreational uses including informal play, walking, cycling and horse riding, provides a space for peace and sanity and its allocation fails to meet objective 10 to promote health and well-being. There is a limited amount of greenspace in the area should and it should be protected.	The Plan needs to be read as a whole as PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist. Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and Policy JPA30 recognises existing formal and informal recreational routes through points 12, 13,	Paul Charlesworth Jacqueline Charnock Joanne Maffia Darryl Myers Gillian Lonergan Paul Charlesworth CPRE Emma Rossington-Otter

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		14, 15, 16 17 and 18, requiring development of the site to incorporate a range of green infrastructure and accessibility mitigation as appropriate. Therefore no change to the Plan is considered as necessary.	
JPA30.49	Allocation of the site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.	<p>The Plan needs to be read as a whole and PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], reflected in the Ashton Moss West Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.</p> <p>Policy JP-G2 recognises that a strategic approach will need to be taken in relation to green infrastructure and that development will occur within and around the Green Infrastructure Network. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and JPA30 policy points 12, 13, 14, 15, 16 17 and 18 set out a range of site specific policy measures in relation to green infrastructure. Therefore no change to the Plan is considered as necessary.</p>	The Wildlife Trusts
JPA30.50	Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Appropriate assessment will be required in accordance with policy JP-G 9 at the application stage. Recognised metrics will be applied to new development proposals to calculate and demonstrate a measurable net gain in biodiversity of no less than 10%. Therefore no change to the Plan is considered as necessary.	The Wildlife Trusts
JPA30.51	Site would be more suitable as a park, with interpretive centre as a gateway to the Pennines and is considered by residents as a Local Nature Reserve in progress.	The Plan needs to be read as a whole as PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at Ashton Moss West as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , reflected in the Ashton Moss West	Paul Charlesworth Roy Ashworth The Wildlife Trusts

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
	It would therefore be a much more suitable location for the delivery of high quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area.	<p>Allocation Topic Paper [10.08.11] set out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>Ashton Moss West has been selected following the site selection methodology, the purpose of which as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.</p> <p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and Policy JPA30 recognises existing formal and informal recreational routes through points 12, 13, 14, 15, 16 17 and 18, requiring development of the site to incorporate a range of green infrastructure and accessibility mitigation as appropriate. Therefore no change to the Plan is considered as necessary.</p>	
	Air Quality (including climate change and pollution)		
JPA30.52	An Existing Air Quality Management Area exists to south and west of M60/A6140 and development will result in an increase in pollution (including noise and light) and a decrease in air quality.	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The existing Air Quality Management area is noted in chapter 21 of the Ashton Moss West Allocation Topic Paper [10.08.11]. Policy JP-S 6 Clean Air, sets out a comprehensive range of measures that will be taken to support improvements in air quality. Future applications will require a range of assessments in accordance with up to date guidance as set out in JP-S 6 and policy points 2, 3 and 4 in particular. Therefore no change to the Plan is considered as necessary.</p>	<p>Christopher Harper CPRE Ian Potts Vicky Harper Gillian Lonergan Andrea Colbourne Phil Chadwick</p>
JPA30.53	Retention of the site as a greenspace would assist in reducing pollution levels and provide a local recreation space, where residents would otherwise need to make use of a motor vehicle to access alternative greenspaces provision resulting in further increases in pollution.	<p>Noted. The Plan should be read as a whole as PfE Sustainable and Resilient Places Chapter 5 contains policies in relation to climate change which are supported by evidence in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01]. The effects of climate change is a key issue against which the Plan is assessed within the IA; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and IA GMSF Main Report 2020 [02.01.02] page 2 and IA GMSF Addendum [02.01.05] pages 3 and 4. Therefore no change to the Plan is considered as necessary.</p>	<p>Darryl Myers CPRE</p>
JPA30.54	Development will contribute towards global warming through an increase in CO2 and greenhouse gas emissions. Development and urbanisation also contributes towards	<p>The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere. It should be noted however, PfE Sustainable and Resilient Places Chapter 5 contains policies in relation to climate change which are supported by evidence in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01]. The effects of climate change</p>	<p>Andrea Colbourne Phil Chadwick Paul Roebuck</p>

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	changes to weather patterns including wind and flooding.	is a key issue against which the Plan is assessed within the IA; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and IA GMSF Main Report 2020 [02.01.02] page 2 and IA GMSF Addendum [02.01.05] pages 3 and 4. Therefore no change to the Plan is considered as necessary.	
JPA30.55	There is a statutory duty on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts.	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere. However, PfE Sustainable and Resilient Places Chapter 5 contains policies in relation to climate change which are supported by evidence in the Carbon and Energy Topic Paper [04.01.05] and Carbon and Energy Implementation Plan [04.01.01] . The effects of climate change is a key issue against which the Plan is assessed within the IA; Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.14, page 208 and IA GMSF Main Report 2020 [02.01.02] page 2 and IA GMSF Addendum [02.01.05] pages 3 and 4. Therefore no change to the Plan is considered as necessary.	Jacqueline Charnock Andrea Colbourne Phil Chadwick
	Flood risk		
JPA30.56	There are existing drainage issues on the site which has a range of attenuation ponds, ditches and drainage channels. There is a concern that development will increase flood risk as a result.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Strategic Flood Risk Assessment [04.02.01] has been undertaken across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment (Appendix B Sites Assessment Part 2) [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to flood risk. Policy JPA30 identifies that development of the site will be required to protect and enhance key landscape and ecological features, including trees, watercourses and existing ponds. Indicative concept plans within Appendix 5 of the Ashton Moss West Allocation Topic Paper [10.08.11] exclude existing ponds from the indicative development area. Therefore no change to the Plan is considered as necessary.	Jacqueline Charnock Vicky Harper Andrea Colbourne Phil Chadwick E Bowles
JPA30.57	Policy should include additional wording to 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	No change is considered necessary. A Strategic Flood Risk Assessment [04.02.01] has been undertaken across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment (Appendix B Sites Assessment Part 2) [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.	United Utilities Group PLC

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	most sustainable and flood resilient solution is achieved.		
JPA30.58	Policy should include additional wording to ensure that 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.	No change is considered necessary. A Strategic Flood Risk Assessment [04.02.01] has been undertaken across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment (Appendix B Sites Assessment Part 2) [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.	United Utilities Group PLC
JPA30.59	Policy should include additional wording to ensure that SuDS 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.	No change is considered necessary. A Strategic Flood Risk Assessment [04.02.01] has been undertaken across the plan, identifying the allocation as less vulnerable to flood risk and the need for a site specific Flood Risk Assessment (Appendix B Sites Assessment Part 2) [04.02.12] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.	United Utilities Group PLC
JPA30.60	Policy should include additional wording to ensure that non-domestic buildings will also be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate.	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
	Viability		

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JPA30.61	Redevelopment of the site is not considered to be commercially viable given the site has been tipped with material and has a peat bog underlying, which means additional non-commercial uses or public funding will be needed to be able to successfully bring it forward.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Stage 2 Strategic Viability Assessment [03.03.04] has been undertaken, as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11], chapter 25, which concludes for the allocation that the proposed development is viable, with a positive residual value, taking into account mitigation measures and requirements of policy. Therefore no change to the Plan is considered as necessary.	Nigel Allen
JPA30.62	Land to the north at Cross Lane Littlemoss should be re-included to support the deliverability of the development which is known to have difficult ground conditions including peat and will require considerable infrastructure to deliver employment development.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Stage 2 Strategic Viability Assessment [03.03.04] has been undertaken, as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11], chapter 25, which concludes for the allocation that the proposed development is viable, with a positive residual value, taking into account mitigation measures and requirements of policy. Therefore no change to the Plan is considered as necessary.	Taylor Wimpey
JPA30.63	Difficulties and cost needed to prepare the site for development are such as to render any employment development undeliverable without substantial public funding. The adjacent plot 3000 has not come forward as an existing allocation due to costs of removing peat and brining in clean fill. The Ove Arup report alludes to the scale of the same issue at Ashton Moss West. A more effective strategy would be to concentrate on Plot 3000 and prevent continued loss of employment sites to housing elsewhere in the borough.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Stage 2 Strategic Viability Assessment [03.03.04] has been undertaken, as summarised within the Ashton Moss West Allocation Topic Paper [10.08.11], chapter 25, which concludes for the allocation that the proposed development is viable, with a positive residual value, taking into account mitigation measures and requirements of policy. Therefore no change to the Plan is considered as necessary.	Nigel Allen
	Design		
JPA30.64	Development will affect outlooks, there will no longer be views of green fields and it will affect surrounding properties and people's lives.	JPA30 policy points 2, 6 and 7 require the development of proposals to consider a range of detailed design matters through the processes of masterplanning and preparing design codes. Therefore no change to the Plan is considered as necessary.	Joanne Maffia John Seddon

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JPA30.65	Development will not result in innovative and creative architecture and result in another anonymous industrial park.	JPA30 policy points 2, 6 and 7 require the development of proposals to consider a range of detailed design matters through the processes of masterplanning and preparing design codes. Therefore no change to the Plan is considered as necessary.	Jacqueline Charnock Paul Charlesworth
JPA30.66	Existing trees, planted to provide privacy and now for the benefit wildlife and mental health should not be removed.	Policy JPA30, point 14, identifies that development of the site will be required to protect and enhance key landscape and ecological features, including trees, watercourses and existing ponds. Therefore no change to the Plan is considered as necessary.	John Seddon
JPA30.67	Respondent not against carefully considered development taking place with consultation with people who are going to be affected.	Noted, JPA30 policy point 2 requires development of the site to be in accordance with a masterplan, phasing strategy and design code approved by the Local Planning Authority for the whole site, developed through engagement with the local community, Council and other appropriate stakeholders. No change is considered as necessary.	Din John Seddon
JPA30.68	Development of the site will require master planning with a focuses on the transition/buffer between existing residential properties and the proposed employment development and sufficient off-road parking.	JPA30 policy points 2, 6 and 7 require the development of proposals to consider a range of detailed design matters through the processes of masterplanning and preparing design codes. Therefore no change to the Plan is considered as necessary.	Joanne Maffia
JPA30.69	Development of the site needs to be sensitively designed to avoid negative impact and privacy concerns to existing residents.	JPA30 policy points 2, 6 and 7 require the development of proposals to consider a range of detailed design matters through the processes of masterplanning and preparing design codes. Therefore no change to the Plan is considered as necessary.	Din John Seddon Andrea Colbourne Phil Chadwick
JPA30.70	Access to Rayner lane and existing residential and businesses should remain.	Noted, JPA30 policy point 2 requires development of the site to be in accordance with a masterplan, phasing strategy and design code approved by the Local Planning Authority for the whole site, developed through engagement with the local community, Council and other appropriate stakeholders such as existing residents, and business which operate or live within the area edged red. Therefore no change to the Plan is considered as necessary.	Din
JPA30.71	Respondents support that a masterplan is required and commitment to jointly prepare this with the council to ensure a deliverable site. Involvement of adjacent landowner is important. Amended policy wording	JPA30 policy point 2 requires development of the site to be in accordance with a masterplan, phasing strategy and design code approved by the Local Planning Authority for the whole site, developed through engagement with the local community, Council and other appropriate stakeholders. Stakeholders are considered to include landowners and therefore whilst it is considered that this proposed wording could	Arqiva Ltd Stayley Developments Limited

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	suggested to reflect more than one land owner exists.	improve the clarity of the policy, it is not considered to be a soundness issue, therefore no change to the Plan is considered as necessary.	
JPA30.72	There will be a negative impact on local landscape character.	Policy JPA30 requires proposals to ensure that architecture is innovative and creative, while respecting and integrating into the surrounding landscape. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A GMSF Landscape Character Assessment [07.01.06] has been undertaken and the reasoned justification of Policy JPA30 at para 11.279 requires that the assessment findings are taken into account. Therefore no change to the Plan is considered as necessary.	CPRE
	Other Matters		
JPA30.73	As GMEU is hosted by TMBC there is a vested interest in GMEU being more favorable to proposals and the process lacks independence.	GMEU provides professional, objective advice to, and on behalf of a number of local authorities based on the best evidence available.	Sarah Burlinson
JPA30.74	It is disappointing that Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan. A review of the Minerals Plan should run alongside PfE mineral supply cannot be assumed and it is essential that a supply is available to support growth.	The Greater Manchester Joint Minerals Development Plan Document (GMJMDDP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJMDDP 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
JPA30.75	GMCA should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the duty to co-operate.	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere.	Andrea Colbourne Phil Chadwick
JPA30.76	PfE and the GMSF cannot effectively be treated as the same plan. PfE is not legally established and should be considered illegal and not put to Government.	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere.	Andrea Colbourne Phil Chadwick
JPA30.77	The Plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Plan	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere.	Andrea Colbourne Phil Chadwick Wolstenholme Fold Farm

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	should meet the tests of soundness set out in the NPPF.		
JPA30.78	<p>Consultation on the Plan should have been carried out in accordance with Statement of Community Involvement of the nine Local authorities participating in PfE including Tameside.</p> <p>Public consultation in Tameside has been poor, there has been a lack of accessible information and little spent in generating awareness with local communities. Information for Ashton Moss West should have been sent directly to all houses within a 3km radius to allow full local feedback, neighbours are not aware of this proposal despite the proximity.</p>	The comment is not considered relevant to the content of the JPA30 and the matter is addressed elsewhere.	<p>Andrea Colbourne</p> <p>Phil Chadwick</p> <p>Jacqueline Charnock</p> <p>Darryl Myers</p>
JPA30.79	When will the Local Plan be available?	The Council's Local Plan will be prepared in line with the published Local Development Scheme . Therefore no change to the Plan is considered as necessary.	<p>Andrea Colbourne</p> <p>Phil Chadwick</p>
JPA30.80	Residential council tax should not rise as a result of this proposal.	Council tax setting is a matter considered through appropriate Council process and is not something within the scope of the plan. Therefore no change to the Plan is considered as necessary.	John Seddon
JPA30.81	Proposals will impact negatively on the value of surrounding residents property value.	Impact on property value is not a material planning consideration. Therefore no change to the Plan is considered as necessary.	<p>Andrea Colbourne</p> <p>Phil Chadwick</p>
JPA30.82	Proposal will result in noise and light pollution and operating hours could be unsociable.	Appropriate assessment will be require at the application stage to mitigate unacceptable impact. Therefore no change to the Plan is considered as necessary.	<p>Andrea Colbourne</p> <p>Phil Chadwick</p>
JPA30.83	There will be dust and debris during construction.	Policy JP-S 6 in relation to clean air, sets out a comprehensive range of measures that will be taken to support improvements in air quality. Applications will require a range of appropriate assessment including assessment of dust from demolition and construction.	John Seddon

Row	Summary of issues raised to PfE2021	Summary response to issues raised to PfE2021	Respondent name(s)
		Policy JP-C7 in relation to Transport Requirements of New Development also requires Construction Management Plans are produced for developments, where appropriate, to mitigate construction logistics and environmental impacts including air quality and noise on the surrounding area and encourage sustainable deliveries. Therefore no change to the Plan is considered as necessary.	

PfE 2021 Policy JP Allocation 31 Godley Green Garden Village

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Principle / scale of development:		
JPA31.1	Size of the development proposed is inappropriate for the area.	<p>Given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land, such as at Godley Green, as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has however been kept to a minimum. The exceptional circumstances case for amending the Green Belt boundary is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] and in section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12].</p> <p>In addition, the site is considered appropriate for development and was selected following assessment using the site selection methodology. The Site Selection Background Paper [03.04.01] sets out the site selection criteria and methodology used. Section 3.0 of the Godley Green Garden Village Topic Paper [10.08.12] states the site covers 123.95 hectare, but only 57.14% of this area is considered to be developable once constraints including existing built features, residential privacy distances and environmental constraints have been excluded as appropriate. Therefore, no change to the Plan is considered as necessary.</p>	<p>Andrea Colbourne Adam Rigby Helen Weddell Cathy Ryan Rebecca Smith</p>
JPA31.2	The development proposed cannot be delivered within the proposed timescale. Concerns were expressed about the ability of developers to deliver the 2,350 dwellings identified over the plan period given the complexity of site ownership, constraints, and the preparatory work and infrastructure required.	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Policy JPA31 identifies that detailed phasing of development on the site would respond to and form part of the masterplan and be developed in consultation with the Council, local community and other appropriate stakeholders. Section 26 of the Godley Green Garden Village Topic Paper [10.08.12] sets out that development is expected to be delivered between 2028/29 and completing beyond the plan period in 2046/47. The Council's Strategic Housing and Economic Land Availability Assessment at para 5.2 considers matters of indicative delivery in more detail. Therefore, no change to the Plan is considered as necessary.</p>	<p>Peter Simon Save Tameside Green Belt Phil Chadwick Andrea Colbourne Danny Cullinane Adam Kilkenny Karen Blake CPRE Crossways Commercial Estates Ltd. Miller Homes</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
			Landowners of Holme Valley
JPA31.3	The allocation is consistent with national policy and exceptional circumstances for the release of Green Belt have been evidenced. The suitability of the site has been established through the use of site selection criteria, and the site is considered to be available with a clear commitment from landowners who own the majority of the site.	Support for the allocation has been noted.	Gerald Eve
	Housing (inc affordable housing):		
JPA31.4	Claimed the housing numbers are unjustified and overestimated, concluding that the housing target is too high, there is a lack of demand locally, it's based on out of date ONS data and does not take into account the EU referendum and the effects of Brexit or the coronavirus pandemic, and therefore the proposal should be deleted.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The housing requirement across the PfE plan area has been calculated using the standard methodology as set out in the PPG and as evidenced in section 3 of the Places for Everyone Housing Topic Paper [06.01.03] . As detailed in Chapters 1, 6 and 7 of PfE, 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 PfE. For further information see COVID-19 and Places for Everyone Growth Options [05.01.03] . Therefore, no change to the Plan is considered necessary.	Marilyn Jones John Jones Save Tameside Green Belt Phil Chadwick Andrea Colbourne Martin Rigby Lesley Bardsley Janine Ainley Helen Weddell Barry Elliott
JPA31.5	Affordability of proposed housing questioned, with only a low proportion of affordable housing identified. Some suggestion that developers will control the level of affordable housing delivered, and that the homeless and those on low incomes will not benefit from the proposal. Some state executive homes are not required as	Policy JPA31 identifies the potential to deliver around 2350 new homes; policy point 2 states these homes will be delivered across a range of types and tenures in accordance with the Council's most up to date Housing Needs Assessment . The Plan should be read as a whole and Policy JP-H 2 sets out the approach to affordability of new housing. The diverse mix of values and tenures will assist in meeting the full range of housing needs as well as aspirations. Therefore, no change to the Plan is considered necessary.	Ellen McInnes Andrew Richardson Janine Ainley Ann Guilfoyle Vicky Harper Cathy Ryan Barry Elliott Karen Blake Michael Young

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	this focus means more affluent people who are likely to commute.		Greater Manchester Housing Providers
JPA31.6	Points out that the predicted demographic change shows that Tameside needs additional housing for single people and the elderly, who progressively require increased care and that building on Godley Green will not provide suitable housing.	Policy JPA31 point 2 states the development will provide for a mix of house types and tenures and be based on the Council's most up to date Housing Needs Assessment . Paragraph 11.296 states elderly care facilities could be included within the village hubs, and point 10 states that higher density residential development will be delivered around Hattersley train station and the village hubs. Therefore, no change to the Plan is considered necessary.	Shirley Brierley Save Tameside Green Belt Barry Elliott
JPA31.7	Suggests that because of topographical and landfill constraints that the density of development would be high and not executive homes as proposed.	Policy JPA31 point 2 states that new homes will be delivered across a range of types and tenures in accordance with the Council's most up to date Housing Needs Assessment . Topography and site constraints will be considered under the requirements of Policy JPA31 point 4 for development to be in accordance with a comprehensive masterplan, phasing strategy and design code, and point 10 states that higher density residential development will be delivered around Hattersley train station and the village hubs. Therefore, no change to the Plan is considered necessary.	Michael Hullock
JPA31.8	The allocation (along with South of Hyde JP Allocation 32) will only deliver 15% affordable housing, contributing a minor amount to the affordable housing requirement for Tameside identified in the Greater Manchester Strategic Housing Market Assessment. Queries whether the allocation could deliver a higher number of affordable homes, and if so whether contributions to biodiversity net gain could also be made, and whether alternative sites that could deliver full planning obligations have been considered.	No change is considered necessary. The Plan should be read as a whole with the strategic approach to delivering affordable housing set out in thematic Policy JP-H 2, and the requirement to deliver a demonstrable net gain in biodiversity set out in policy JP-G 9. Policy JPA31 point 2 states the development will provide for a mix of house types and tenures and be based on the Council's most up to date Housing Needs Assessment . Policy H4 of the Tameside Unitary Development Plan will still require development to provide an element of affordable or low cost housing where there is a demonstrable lack of such housing to meet local needs. Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.	Wainhomes (NW) Ltd
JPA31.9	Site is considered to be in a suitable and viable location for large scale housing which can deliver a significant proportion of the Council's housing need through a high	Support for the allocation is noted.	Gerald Eve

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	quality development that reflects garden village principles. The detailed wording of site specific policy for Godley Green is broadly supported by the landowners and is considered to be a suitable mechanism from which future development at the site can be assessed.		
JPA31.10	A strategy to guarantee housing delivery rates should be provided.	The Council undertakes annual monitoring of housing delivery. The monitoring framework in Chapter 12 of the Plan provides an appropriate level of detail for a strategic plan. Where the Council fails to deliver sufficient housing, the requirements of the Housing Delivery Test will be triggered as appropriate.	Phil Chadwick Andrea Colbourne
	Employment and Economy:		
JPA31.11	There are limited employment opportunities in the local area and this fact increases the need for people to travel to access employment.	Policy JPA31 point 12 requires employment, education and training opportunities to be provided throughout the construction phases and upon completion of development on the site. Policy JP-J 1 aims to support long-term economic growth across all nine districts alongside Policy JP-C 1 which aims to deliver an integrated transport network to ensure opportunities are available to all. Employment and training opportunities within the allocation are discussed in section 23 of the Godley Green Garden Village Topic Paper [10.08.12] . Therefore, no change to the Plan is considered necessary.	Nancy Morris Ann Guilfoyle Colin Walters
JPA31.12	Few new jobs will be created within the allocation and partners for securing employment provision should be identified early on.	Policy point 12 requires employment, education and training opportunities to be provided throughout the construction phases and upon completion. Policy JP-J 1 aims to support long-term economic growth across all nine districts alongside Policy JP-C 1 which aims to deliver an integrated transport network. It is not considered necessary at this stage to identify partners for securing employment provision. Therefore, no change to the Plan is considered necessary.	John Jones Phil Chadwick Andrea Colbourne Susan Peat
JPA31.13	Developing the site will result in a loss of jobs in the rural economy.	Paragraphs 1.47 and 1.48 of the Plan acknowledge that given the lack of sufficient land to meet overall housing and employment needs, there is a strategic exceptional circumstances case to be made to release Green Belt land for development. The site has been through the site selection process; the site selection criteria and methodology of which are set out in the Site Selection Background Paper [03.04.01] alongside a list of discounted sites that were also considered during the site selection process. Whilst existing employment uses within the site may cease, Policy JPA31 point 12 requires employment, education and training opportunities to be provided throughout the construction phases and upon	John Pender

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		completion, and the Plan needs to read as a whole, whereby Policy JP-J 1 aims to support long-term economic growth across all nine districts. Therefore, no change to the Plan is considered necessary.	
	Green Belt:		
JPA31.14	Objections to loss of Green Belt, reasons given state that development of the site will lead to: the merging of Hyde and Hattersley; encroachment into and suburbanisation of the countryside; urban sprawl; harm to the rural economy; harm to habitat and ecology and it would result in the loss of a resource which provides public benefit.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Godley Green as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The exceptional circumstances case for amending the Green Belt boundary is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] and in section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12]. Therefore, no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 1.
JPA31.15	General comments stating the importance of Green Belt / Green Belt is 'sacrosanct'.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Godley Green as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The exceptional circumstances case for amending the Green Belt boundary is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] and section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12]. Therefore, no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 2.
JPA31.16	Alternatives to using Green Belt, such as building on brownfield sites, are available / have not been considered.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Godley Green as it is critical to the delivery of the overall vision and objectives of the Plan. Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release	For a list of respondents see Appendix Table 3.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>of Green Belt land and the Site Selection Background Paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>The exceptional circumstances case for amending the Green Belt boundary is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25] and section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12]. In addition, the Council maintains an up to date Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register to support the identification of such opportunities. Therefore, no change to the Plan is considered necessary.</p>	
JPA31.17	Exceptional circumstances for release from Green Belt have not been justified / evidenced.	The exceptional circumstances case for amending the Green Belt boundary is set out in the Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary [07.01.25], and section 14 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12]. Therefore, no change to the Plan is considered necessary.	Peter Simon Phil Chadwick Andrea Colbourne Danny Cullinane Janine Ainley Lee Mountney Barry Elliott Karen Blake
JPA31.18	Green Belt additions are questionable, they do not fulfil the purposes of Green Belt and do not compensate for the loss of Green Belt elsewhere.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with the NPPF. The justification for the Green Belt additions in Tameside is provided in Appendix 3 of the Green Belt Topic Paper [07.01.25] Appendix 3 (pages 52-73).	Peter Simon Gareth Birch AM Wadsworth Barry Elliott
	Brownfield:		
JPA31.19	The need for town centre regeneration was highlighted, specifically in relation to Hyde.	<p>The Plan as a whole encourages the efficient use of previously developed land to support the regeneration of urban areas, with a clear preference for using brownfield sites as set out in paragraphs 1.41 to 1.46. The Council updates the Brownfield Land Register and Strategic Housing and Economic Land Availability Assessment as necessary.</p> <p>Development at Godley Green is expected to increase demand for retail, leisure and services supporting Hyde town centre, as well as in supporting the regeneration of Hattersley. The Tameside Inclusive Growth Strategy (page 24) identifies Godley Green and acknowledges that increased residential development, such as proposed, can revive town centres. Therefore, no change to the Plan is considered necessary.</p>	Nancy Morris Michael Hullock John Jones Kate Jackson Helen Weddell Colin Walters

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA31.20	Questions the accuracy of the figures showing the amount of available brownfield land. The need for an up-to-date Brownfield Land Register was also highlighted.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as the Council maintains an up to date Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register to support the identification of such opportunities. Therefore, no change to the Plan is considered necessary.	Marilyn Jones Save Tameside Green Belt Barry Elliott Karen Blake
	Transport – Highways / Public Transport / Cycling / Walking:		
JPA31.21	Current traffic issues highlighted. Existing highway infrastructure will not be able to support potential increase in traffic arising from development. Lack of public transport and not everyone will cycle, walk or get the train or bus. No new infrastructure has been identified and no traffic modelling has been carried out.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The impact on highway infrastructure has been considered through appropriate assessment, as evidenced in the Transport Locality Assessment - Tameside allocations document [09.01.14] , Transport Locality Assessments Addendum – Tameside document [09.01.26] and summarised in section 10 of the Godley Green Garden Village topic Paper [10.08.12] . Potential mitigation measures have been identified and the Locality Assessment concludes the impact arising from the allocation as well as the cumulative impact of other GMSF allocations to be less than severe subject to the implementation of mitigation. Additional work at the planning application stage will refine the existing Locality Assessment and mitigation required, with Policy JP-C 7 setting out a requirement for planning applications to be accompanied by a Transport Assessment / Travel Plan where appropriate. In addition, Policy JPA31 point 11 requires the provision of developer contributions towards transport infrastructure as appropriate, as well as the promotion of active travel and the provision of bus routing through the allocation. Therefore, no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 4.
JPA31.22	The current rail network is already overstretched and often with standing room only during rush hour from Hattersley. Concerns raised it will not be able to cope with the additional demand. Some respondents stated the rail network is only good for accessing Manchester.	Policy JPA31 point 11 requires the provision of developer contributions towards transport infrastructure as appropriate, as well as the promotion of active travel and the provision of bus routing to encourage a variety of travel options. Policy point 16 requires a multi-user bridge to be provided to provide access to Hattersley Station from the allocation, within the early phases of development. The Plan should be read as a whole and policy JP-C 7 requires new development to be designed to enable and encourage walking, cycling and public transport use. The Greater Manchester Our Five Year Transport Delivery Plan 2021-2026 identifies the potential for Metro/Tram-Train on the Glossop line as well as network-wide rail service improvements across Greater Manchester and the A57 bus corridor upgrade and Cycle Scheme. The Locality Assessment [09.01.14]	For a list of respondents see Appendix Table 5.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		acknowledges that there are separate works outside of the GMSF planned to improve the passenger facilities at Hattersley Station funded through the Growth Deal programme (paragraph 6.4.5). Therefore, no change to the Plan is considered necessary.	
JPA31.23	Sceptical about the delivery and investment required to improve the local rail network to support an increase in local population. Some respondents highlighted the physical constraints of the rail network would prohibit increasing rail services.	Policy JPA31 requires the provision of developer contributions towards transport infrastructure as appropriate (point 11), as well as the promotion of active travel (point 18) and the provision of bus routing (point 15) to encourage a variety of travel options. The Greater Manchester Our Five Year Transport Delivery Plan 2021-2026 identifies the potential for Metro/Tram-Train on the Glossop line. The Locality Assessment [09.01.14] acknowledges that there are separate works outside of the GMSF planned to improve the passenger facilities at Hattersley Station funded through the Growth Deal programme (paragraph 6.4.5). Therefore, no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 6.
JPA31.24	Trans Pennine Trail has been included in the allocation for PfE; it was not shown in previous versions of the GMSF.	The comments have been noted.	Trans Pennine Trail
JPA31.25	Suggested there should be two access points into the eastern village; the allocation topic paper suggests only one is to be provided.	The current site Concept Plan, Key Proposals Plan and Illustrative Framework Plan provided in the JPA31 – Godley Green Garden Village Topic Paper [10.08.12] are indicative. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The impact on highway infrastructure has been considered through the Transport Locality Assessment - Tameside allocations document [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] and summarised in section 10 of the Godley Green Garden Village topic Paper [10.08.12] . In accordance with Policy JP-C 7 a Transport Assessment and Travel Plan will be required where appropriate at the planning application stage which will determine the final access solutions. Therefore, no change to the Plan is considered necessary.	Christine Bagshaw
JPA31.26	The transport locality assessment is insufficient to evidence how the transport impacts from the development can be mitigated. Specific examples include lack of modelling of eastward traffic movements, the need for radical and costly infrastructure and engineering projects, lack of detail on funding and viability of these infrastructure and engineering projects.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The impact on highway infrastructure has been considered through appropriate assessment evidenced in the Transport Locality Assessment - Tameside allocations document [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] and summarised in section 10 of the Godley Green Garden Village topic Paper [10.08.12] . Additional work at the planning application stage will refine the existing Locality Assessment and mitigation required, with Policy JP-C 7 setting out a requirement for planning applications to be accompanied by a Transport Assessment and Travel Plan where appropriate.	Peter Simon Michael Hullock Marilyn Jones Kevin Walsh

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		In addition, Policy JPA31 point 11 requires the provision of developer contributions towards transport infrastructure as appropriate, as well as the promotion of active travel and the provision of bus routing through the allocation. Therefore, no change to the Plan is considered necessary.	
JPA31.27	The evidence underpinning the allocation does not identify in sufficient detail the nature, scale and timing of the infrastructure requirements at the SRN, or what future assessments and studies will be required to determine any such infrastructure requirements.	<p>The Transport Locality Assessments - Tameside allocations document [09.01.14] and Transport Locality Assessments Addendum – Tameside document [09.01.26] provide detailed information on the nature, scale and timing of infrastructure requirements at the Strategic Road Network (SRN).</p> <p>With respect to future assessments the report states that allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our “Right Mix” vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 09.01.01 GM Transport Strategy 2040 and 09.01.02 GM Transport Strategy Our Five Year Delivery Plan 2021-2026. We are also working alongside National Highways to prepare a further piece of work examining a “policy-off/worst-case” impact on the SRN to help address National Highways remaining concerns.</p>	National Highways
	Physical Infrastructure and utilities:		
JPA31.28	There is a lack of supporting infrastructure and concerns about drainage/sewerage and water supply. New infrastructure needs to be put in place prior to development.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Section 13 of the JPA31 – Godley Green Garden Village Topic Paper [10.08.12] sets out that there are no known capacity constraints relating to fresh or wastewater that would impact upon the site’s deliverability. A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P 1 and JP-D 2 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. Policy JPA31 point 6 also requires an integrated and co-ordinated approach to infrastructure to support the scale of the whole development.	For a list of respondents see Appendix Table 7.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA31.29	Insufficient information included on the funding of new infrastructure.	<p>A number of policies in the Plan provide a sufficient policy framework to address this matter, such as Policies JP-P 1 and JP-D 2 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.</p> <p>Policy JPA31 point 6 requires an integrated and co-ordinated approach to infrastructure to support the scale of the whole development, and detailed discussions on contributions to infrastructure provision will be set out at the detailed planning application stage. Point 11 requires developer contributions are provided towards education, health, transport and other infrastructure as deemed appropriate. Therefore, no change to the Plan is considered necessary.</p>	Phil Chadwick Andrea Colbourne
JPA31.30	New dwellings should be required to meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Non-domestic buildings will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate.	Water efficiency measures in new developments will be a matter for district local plans or further guidance 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 necessary.	United Utilities Group PLC
	Social Infrastructure:		
JPA31.31	Highlights the existing strain on social infrastructure including schools, doctors, dentists and hospital places. There has been no consideration of how these services would cope with the additional demand from the allocation.	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Policy JPA31 point 11 requires developer contributions are provided towards education, health, transport and other infrastructure as deemed appropriate; point 13 requires land to be set aside to accommodate additional education provision unless it can be demonstrated that sufficient school places will be accommodated off site within the local area. Consideration of social infrastructure provision is set out in Section D of the JPA31 Godley Green Garden Village Allocation Topic Paper [10.08.12].</p> <p>Planning for school places is a dynamic process and the Council's strategy is regularly refreshed. Paragraph 23.4 of the Godley Green Garden Village Allocation Topic Paper [10.08.12] sets this out in further detail. Detailed discussions on contributions to social infrastructure provision will be set out at the planning application stage.</p>	For a list of respondents see Appendix Table 8.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>The Godley Green Garden Village Allocation Topic Paper [10.08.12] section 24.0 sets out the approach to healthcare provision for the allocation. Policy JP-P 6 supports improvements in health facilities and requires new developments that would significantly increase demand to, where appropriate, provide new or improved health facilities as part of the development. Policy JP-P 6 also requires developments that are subject to an Environmental Impact Assessment be supported by a Health Impact Assessment (HIA). It is expected an HIA will form part of the detailed planning application stage for the site. Therefore, no change to the Plan is considered necessary.</p>	
JPA31.32	Existing noise, anti-social behaviour and crime issues may be exacerbated and police and emergency services are already stretched.	A number of policies in the Plan address this matter such as Policy JP-S 4 which states one of a number of key measures to ensure resilience will be to design out opportunities for crime, anti-social behaviour and terrorism. Policy JP-P 1 states developments should be safe, including by designing out crime and terrorism, and reducing opportunities for anti-social behaviour and the Plan should be read as a whole and no change is considered necessary.	Colin Walters
	Environmental – Green Infrastructure, Biodiversity, open space:		
JPA31.33	Developing the area would lose the valued, accessible, public open spaces that contribute towards wellbeing and are used by residents and visitors for walking, running, cycling and horse riding.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Policy JPA31 point 24 requires development to set aside land for a range of public open spaces such as parks and gardens, natural space, amenity space, play provision and allotments in accordance with the Council’s most up to date Open Space Review . Policy JPA31 point 19 also states that development of the site should incorporate and enhance existing public rights of way and the Trans Pennine Trail. Therefore, no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 9.
JPA31.34	The area contains ecosystems recognised as being of environmental importance and includes a wide variety of species including: Great Crested Newts, bats, deer, foxes, rabbits, hedgehogs, hares, along with numerous species of wild birds, invertebrates and insects. Developing the site would result in the loss of wildlife and their habitats, including protected species.	<p>Sections 15 and 18 of the Godley Green Garden Village Topic Paper [10.08.12] acknowledge the presence of Sites of Biological Importance (SBIs) and other ecological features including Ancient Woodland and protected species within the allocation boundary. The Indicative Concept Plan in Appendix 5 of the topic paper excludes those SBI and woodland at Godley Brook and Brookfold Wood from the indicative developable area.</p> <p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Preliminary Ecological Appraisal [10.08.05] as well as a plan-wide Habitat Regulation Assessment [02.02.01] having been undertaken. It was concluded that a planning application would require appropriate surveys for badgers and amphibians alongside an extended Phase 1 habitat survey. Policy</p>	For a list of respondents see Appendix Table 10.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	There has been little or no consideration given to the impact on wildlife.	JPA31 points 21 and 22 require development of the site to protect and enhance the designated SBIs and to protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. The Plan should be read as a whole and development of the site will be required to be in accordance with the wider thematic policies of the Plan including JP-G 7 'Trees and Woodland' and Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'. Therefore, no change is considered necessary.	
JPA31.35	Highlights existing land use as agricultural, the development of which will mean loss of farmland for grazing.	<p>The Plan acknowledges that given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Godley Green as it is critical to the delivery of the overall vision and objectives of the plan. Paragraphs 1.47 and 1.48 of the Plan acknowledge that given the lack of sufficient land to meet overall housing and employment needs, there is a strategic exceptional circumstances case to be made to release Green Belt land for development. The site has been through the site selection process; the site selection criteria and methodology are set out in the Site Selection Background Paper [03.04.01].</p> <p>The site is recorded as being of either Grade 4 agricultural land or urban in nature and is primarily used for pasture and grazing. The identification as Grade 4 agricultural land quality means that in planning terms none of the agricultural land falls within the 'best and most versatile' agricultural land categories (Grades 1, 2 and 3a) as defined in the NPPF. Therefore, no change to the Plan is considered necessary.</p>	Joanne Maffia Joyce Elliott Susan Peat
JPA31.36	The site incorporates two SBIs, Brookfold Wood and Werneth Brook. Both of these sites must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF paragraphs 174a, 174d, 175, 179a, 179b and 180a. Brookfold Wood is also an area of Ancient woodland which is an irreplaceable habitat as per paragraph 180 of the NPPF. The development proposed could result in loss and deterioration of an irreplaceable habitat and would be contrary to policy JP-G 7. Part of	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. A Preliminary Ecological Appraisal [10.08.05] as well as a plan-wide Habitat Regulation Assessment [02.02.01] has been undertaken. It concluded that a planning application would require appropriate survey for badger and amphibians alongside an extended Phase 1 habitat survey. Policy JPA31 points 21 and 22 require development of the site to protect and enhance the designated SBIs and to protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Development will be required to be in accordance with the wider thematic policies of the Plan including JP-G 7 'Trees and Woodland' and Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'. Therefore, no change to the Plan is considered necessary.	The Wildlife Trusts

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	the site also sits within the PfE Green Infrastructure Network.		
JPA31.37	Designated SBIs within the allocation should be better protected and enhanced.	<p>Sections 15 and 18 of the Godley Green Garden Village Topic Paper [10.08.12] acknowledge the presence of SBIs and other ecological features including Ancient Woodland and protected species within the allocation boundary. The Indicative Concept Plan in Appendix 5 of the topic paper excludes woodland at Godley Brook and Brookfold Wood from the indicative developable area.</p> <p>Policy JPA31 points 21 and 22 require development of the site to protect and enhance the designated Sites of Biological Importance and to protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Development will be required to be in accordance with the wider thematic policies of the Plan including JP-G 7 'Trees and Woodland' and Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'. Therefore no change to the Plan is considered necessary.</p>	Karen Kirby CPRE
JPA31.38	The mitigation hierarchy should be applied to comply with policy JP-G 9 and areas of actual and potential priority habitats including lowland meadow, an extensive hedgerow network, Werneth Brook and small woodlands should be excluded from the allocation in order to avoid harm to biodiversity.	Policy JPA31 points 21 and 22 require development of the site to protect and enhance the designated Sites of Biological Importance and to protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Therefore no change is considered necessary.	The Wildlife Trusts
JPA31.39	Existing woodland within the site, including that along the railway line, should be protected. Suggestions to offer protection to existing woodland include extending Werneth Low Country Park, or retaining some woodland within the Green Belt.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Policy JPA31 points 21 and 22 require development of the site to protect and enhance the designated Sites of Biological Importance and to protect and enhance key landscape and ecological features including protected trees and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Therefore appropriate survey will be needed at the application stage. In addition, Policy JP-G 9 sets out the biodiversity and geodiversity enhancement across the Plan as a whole. Therefore no change to the Plan is considered necessary.	Alex Gradwell-Spencer Frank Gradwell
JPA31.40	Effort should be made to identify potentially unmapped ancient woodland affected by site allocations.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The areas of existing Ancient Woodland within the allocation have been identified through designation as Sites of Biological Importance. Policy JPA31 points 21 and 22 require development of the	Cathy Ryan

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>site to protect and enhance the designated Sites of Biological Importance and to protect and enhance key landscape and ecological features including protected treed and woodlands, Ancient Woodland, other mature trees, hedgerows, cloughs, watercourses and ponds. Development will be required to be in accordance with the wider thematic policies of the Plan including JP-G 7 'Trees and Woodland' and Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'. An appropriate survey at the detailed planning application stage in accordance with relevant PPG will be required to determine protection and enhancement requirements. Therefore no change to the Plan is considered necessary.</p>	
JPA31.41	<p>The allocation would increase recreational pressures on nearby SAC and SPA as well as on Werneth Low Local Nature Reserve and Werneth Low Country Park SBI.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. The Habitat Regulation Assessment (HRA) of PfE [02.02.01] concluded the Plan will not cause adverse impacts on site integrity of any European designated sites providing that the recommended mitigation measures as identified in the HRA are implemented through the detailed planning application process.</p> <p>There are specific policies in the Plan aimed at improving local Green Infrastructure, protecting and improving designated nature conservation sites and upland habitats and addressing the need to avoid harm to European designated sites from the operation of the Plan (Policies JP-G 1, JP-G 2, JP-G 3, JP-G 5, JP-G 6). In addition, Policy JPA31 point 24 requires development to set aside land for a range of public open spaces such as parks and gardens, natural space, amenity space, play provision and allotments in accordance with the Council's most up to date Open Space Review. Therefore, no change to the Plan is considered necessary.</p>	<p>Save Tameside Green Belt The Wildlife Trusts</p>
JPA31.42	<p>Request that an appropriate ecological assessment be undertaken.</p>	<p>It is considered that a proportionate evidence base has been provided to support the allocation. The allocation has been accompanied by a Preliminary Ecological Appraisal [10.08.05] as well as a plan-wide Habitat Regulation Assessment [02.02.01]. The Ecological Appraisal concluded that a planning application would require appropriate surveys for badgers and amphibians alongside an extended Phase 1 habitat survey. Policy JPA31 point 21 requires development of the site to protect and enhance designated SBIs, whilst point 22 requires development to protect and enhance key ecological features. An appropriate survey at the detailed planning application stage in accordance with relevant PPG will be required to determine protection and enhancement requirements. Therefore no change to the Plan is considered necessary.</p>	<p>Paul Gilbert Cathy Ryan</p>
JPA31.43	<p>The allocation already has high biodiversity value raising concerns about being able to secure 10% net gain for the site.</p>	<p>Policy JP-G 9 requires development to demonstrate a biodiversity net gain of no less than 10%. Recognised metrics will be applied to new development proposals to calculate and demonstrate a measurable net gain in biodiversity. Therefore no change to the Plan is considered necessary.</p>	<p>The Wildlife Trusts</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA31.44	The allocation does not address the issue of / does not help combat climate change. Some respondents make reference to the requirement to address climate change set out in the Planning and Compulsory Purchase Act 2004.	Comment not considered relevant to the content of JPA31. The matter is addressed elsewhere and the Plan as a whole is considered to comply with relevant legislation. Policies on climate change are set out within Chapter 5 Sustainable and Resilient Places in the Plan. Therefore no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 11.
	Air Quality:		
JPA31.45	Air pollution is a significant issue and linked to poor respiratory health, this would be exacerbated by additional development and the traffic generated.	Policy JP-S 6 sets out the measures that will be taken to support improvements in air quality across the plan, including determining planning applications in accordance with the most recent development and planning control guidance. Therefore no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 12.
	Flood Risk:		
JPA31.46	Developing the site will increase the risk of flooding. There is already flooding in the area, existing drainage is already unable to cope with heavy rainfall. The ground is generally waterlogged with a high water table. The upland habitat of Werneth Low is a source of a large amount of rainwater runoff and the area is important for absorbing rainfall.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including being assessed as part of the Plan-wide Level 1 Strategic Flood Risk Assessment (SFRA) [04.02.01]. The outcome of which is shown in Appendix B Sites Assessment Part 1 [04.02.11]. The SFRA identified the site as being entirely within Flood Zone 1 which presents lowest risk, and 9.2%, 3.89% and 2.76% of the site being in the lowest, medium and highest risk zones respectively for surface water flooding. The SFRA concluded a Flood Risk Assessment would be required for development of the site at the planning application stage. Paragraphs 11.289 and 11.290 of the Plan state development of the allocation should be accompanied by an integrated approach to delivering infrastructure, which should include a site-wide drainage strategy that incorporates sustainable drainage systems. In addition, the Plan should be read as a whole and Policy JP-S 5 sets out policy requirements in terms of managing flood risk. Therefore no change to the Plan is considered necessary.	For a list of respondents see Appendix Table 13.
JPA31.45	Policy wording should be amended to ensure that sustainable drainage systems are fully incorporated into the development, discharging in accordance with the hierarchy of drainage options and designed in accordance with nationally recognised	No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as more vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.11] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.	United Utilities Group PLC

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	SuDS design standards. Natural and multi-functional SuDS should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network.		
JPA31.46	There should be a clear allocation-wide strategy for foul and surface water management, demonstrating 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.	<p>No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as more vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.11] at the planning application stage in accordance with national policy and guidance. Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter.</p> <p>Policy JPA 31 point 6 states development of the site should take an integrated and co-ordinated approach to infrastructure to support the scale of the whole development. As stated in paragraphs 11.289 and 11.290 this should include a site wide drainage strategy that incorporates sustainable drainage systems with the aim of achieving greenfield run-off rates.</p>	United Utilities Group PLC
	Viability:		
JPA31.47	The Stage 2 Viability Report needs to be more transparent and include a breakdown of individual policy costs such as those towards education and health. Comments also claim the benchmark land values used are too low.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and a Strategic Viability Report - Stage 2 Allocated Sites Viability report [03.01.04] has been undertaken. The Strategic Viability Report, as summarised in section 25.0 of the Godley Green Garden Village Allocation Topic Paper [10.08.12] , found the site to be viable. Therefore no change to the Plan is considered necessary.	<p>Mark and Jill Cheetham and Bailey</p> <p>Frank and Margaret</p> <p>Jean Gradwell</p> <p>William and Kathryn Walsh</p> <p>Michaela Forbes</p> <p>Mark, Karl, Lynden and Cheryl Hazlehurst and Blease</p>
JPA31.48	Claims the site would not be viable without the £10m from the Housing Infrastructure Fund. There would be £0 contributions towards biodiversity net gain, electric	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and a Strategic Viability Report - Stage 2 Allocated Sites Viability report [03.01.04] has been undertaken. The Strategic Viability Report, as summarised in section 25.0 of the Godley Green Garden	Wainhomes (NW) Ltd

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	charging points and the future homes Standard.	Village Allocation Topic Paper [10.08.12] , found the site to be viable. Therefore no change to the Plan is considered necessary.	
	Other:		
JPA31.49	The proposal does not meet the national criteria for a Garden Village or fulfil Garden Village principles.	Policy JPA31 point 3 states development of the site will be enshrined in Garden City Principles. It is considered development of the site can be undertaken in accordance with Garden City Principles. Therefore no change is considered necessary.	Save Tameside Green Belt Danny Cullinane
JPA31.50	The development proposed is considered to meet Garden Village standards.	The comments have been noted.	Alex Gradwell-Spencer Frank Gradwell
JPA31.51	PfE cannot be treated as the same plan as the GMSF, not until its legality has been established.	Comment not relevant to the content of policy JPA31 as the matter is addressed elsewhere.	Phil Chadwick Andrea Colbourne
JPA31.52	The allocation contradicts existing policy and national government guidelines, as well as the policy objectives within PfE.	No change is considered necessary. Policy JPA31 is considered to be consistent with existing policy and guidance, as well as with PfE.	Peter Simon Martin Goddard Michael Hullock Caroline Grimshaw Danny Cullinane Rachael Thomas Cathy Ryan Michael Young
JPA31.53	No timeframes for individual authority local plans has been provided.	The Council's Local Plan will be prepared in line with the published Local Development Scheme .	Phil Chadwick Andrea Colbourne
JPA31.54	No evidence provided that GMCA have acted in-line with the 'duty to cooperate'.	Comment not relevant to the content of policy JPA31 as the matter is addressed elsewhere.	Save Tameside Green Belt Phil Chadwick Gemma Parker Andrea Colbourne Danny Cullinane Gillian Wolstencroft Patricia Fletcher Adam Kilkenny

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA31.55	Public consultation on the allocation was inadequate and the Council has not acted in accordance with its Statement of Community Involvement. Comments include overall lack of consultation, poor cooperation from the Council, limited information made available, lack of site notices, consultation events held at inconvenient times, views of public ignored.	Comment not relevant to the content of policy JPA31 as the matter is addressed elsewhere.	For a list of respondents see Appendix Table 14.
JPA31.56	The site selection process has been opaque, no explanation why some sites in call for sites were excluded, process should be repeated.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and the site is considered appropriate for development. It was selected following assessment using the site selection methodology. The Site Selection Background Paper [03.04.01] sets out the site selection criteria and methodology used. Therefore no change is considered as necessary.	Phil Chadwick Andrea Colbourne
JPA31.57	Suggest that the agenda is developer driven and that they are profit driven and have a preference for green field sites.	<p>The Plan sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land such as at Godley Green as it is critical to the delivery of the overall vision and objectives of the plan. The site was selected following assessment using the site selection methodology. The Site Selection Background Paper [03.04.01] sets out the site selection criteria and methodology used.</p> <p>Planning Guidance identifies that a landowner should be able to make a minimum return at which they would be willing to sell their land. A stage two viability appraisal [03.03.04] has been undertaken for the site as summarised within the Godley Green Garden Village Allocation Topic Paper [10.08.12], chapter 25, and the site shown to return a positive residual value. Therefore no change is considered necessary.</p>	Victoria Norton Kevin Walsh Vicky Harper
JPA31.58	There would be an impact upon Hyde and Hattersley in terms of effect upon sense of place.	Policy JPA31 point 4 requires development of the site to be in accordance with a comprehensive design code for the whole site and which is approved by the local planning authority in consultation with the local community, Council, and other stakeholders. Policy point 9 requires each of the two villages to have their own unique identity, and point 7 states architecture should respect and integrate into the surrounding landscape, thereby offering the opportunity to shape the sense of place that the development can deliver. Therefore no change is considered necessary.	Nancy Morris Lesley Bardsley

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA31.59	There is no recognition of the established horse riding community within the area and where they will be displaced to. The development would mean less stabling in the area and restricted opportunities for horse riding.	<p>Given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land, such as at Godley Green, as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has however been kept to a minimum. The site was selected following assessment using the site selection methodology as set out in the Site Selection Background Paper [03.04.01].</p> <p>The horse riding community is acknowledged within the policy JPA31 point 16 wording with a requirement to provide a multi-user (including equine) bridge connecting to Hattersley in the early phase of development and point 19 requires development to incorporate and enhance routes through the site including the Trans Pennine Trail. Policy JPA31 point 24 requires development to set aside land for a range of public open spaces such as parks and gardens, natural space, amenity space, play provision and allotments in accordance with the Council's most up to date Open Space Review. Therefore, no change is considered necessary.</p>	Nancy Morris Kim Scragg Save Tameside Green Belt Danny Cullinane Joyce Elliott Alex Ashton
JPA31.60	The development is not sustainable.	Godley Green Garden Village has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the Plan's Vision, Objectives and Spatial Strategy and which help meet the housing and employment land supply. The Plan has been subject to an integrated assessment including the elements of sustainability appraisal via the GMSF Scoping Report 2021 [02.01.01] , GMSF Main Report 2020 [02.01.02] and GMSF Addendum [02.01.05] . Therefore no change is considered necessary.	Christopher Harper Kate Jackson Gillian Wolstencroft Vicky Harper Adam Kilkenny
JPA31.61	Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown on the plan. There is a need to safeguard mineral resources which is not addressed adequately in the Plan.	The Godley Green Garden Village Topic Paper [10.08.12] paragraph 12.2 acknowledges parts of the site are identified through the Greater Manchester Joint Minerals Development Plan (GMJMDP) as mineral safeguarding areas for brick clay, sand and gravel and sandstone, whilst also being identified as an area of search for sand. The 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
JPA31.62	The supporting evidence is inadequate, and some comments state the supporting assessments should be repeated. Comments refer to the flood risk	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and therefore no change is considered as necessary.	Paul Gilbert Marilyn Jones Kevin Walsh Gillian Wolstencroft

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	assessment, Strategic Environmental Assessment, and Historic Environment Appraisal.		Adam Kilkenny
JPA31.63	Mentions a planning application for the development of the site has now been submitted. Some comments state this is evidence the site is viable.	The Council as Local Planning Authority is in receipt of a planning application for Godley Green. Its application reference number is 21/01171/OUT.	Alex Gradwell-Spencer Frank Gradwell Gerald Eve
JPA31.64	Objections to possible use of Compulsory Purchase Orders.	Paragraph 12.3 of PfE states that in implementing the policies and proposals within the Plan, Local Authorities should make the best of all appropriate delivery mechanisms available, which can include the use of compulsory purchase powers to assist with site assembly. No change is considered necessary.	Carolynne Fletcher Sarah Burlinson Rachael Thomas
JPA31.65	The allocation is supported by a number of landowners who are willing to bring their land forward to market.	The support of landowners is noted.	Christine Bagshaw Alex Gradwell-Spencer Mark and Jill Cheetham and Bailey Frank and Margaret Jean Gradwell William and Kathryn Walsh Michaela Forbes Mark, Karl, Lynden and Cheryl Hazlehurst and Blease Frank Gradwell
JPA31.66	Allocation policy wording needs to be more detailed. Respondents state the policy wording should: set out what Garden City principles are and what is expected from development; provide detail to support the requirement for an integrated and co-ordinated approach to infrastructure; and	It is considered that the policy wording is sufficiently detailed. Paragraph 11.284 of the Plan links to the TCPA website page ' Understanding Garden Villages ' which details the Garden City principles. Therefore no change is considered necessary.	Mark and Jill Cheetham and Bailey Frank and Margaret Jean Gradwell William and Kathryn Walsh Michaela Forbes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	provide detail on what additional education provision is to be provided.		Mark, Karl, Lynden and Cheryl Hazlehurst and Blease John Pender
JPA31.67	Respondents accept the role of the Plan is to identify and assess suitable sites for development, it is not to set out specifics such as detailed design considerations, site layout or zoning.	The comments have been noted.	Alex Gradwell-Spencer Frank Gradwell

Appendix

Respondents to PfE 2021 Policy JP Allocation 31 Godley Green Garden Village

Table 1. Row JPA31.14

First Name	Last Name	On behalf of company/organisation or individual
Shirley	Brierley	NA
Peter	Simon	NA
Martin	Goddard	NA
Donna	Bamforth	NA
Nicola	Hadley	NA
Carolyne	Fletcher	NA
Deborah	Wedlock	NA
Nancy	Morris	NA
Dee	Shenton	NA
Michael	Hullock	NA
E	Bowles	NA
Marilyn	Jones	NA
Sarah	Burlinson	NA
Janet	Howarth	NA
M. E.	Lomas	NA
Kevin	Walsh	NA
Claire	Elliott	Save Tameside Greenbelt
John	Walker	NA
Karen	Kirby	NA
Martin	Rigby	NA
Lesley	Bardsley	NA
Emma	Power	NA
Adam	Rigby	NA
Rachael	Thomas	NA
Joyce	Elliott	NA

Karen	Shreeve	NA
Kate	Jackson	NA
Janine	Ainley	NA
Ann	Guilfoyle	NA
John	Pender	NA
Ian	Potts	NA
Richard	Jenkins	NA
Barry	Elliott	NA
Nicola	Shenton	NA
Michael	Young	NA
Paul	Roebuck	NA
Jackie	Copley	CPRE

Table 2. Row JPA31.15

First Name	Last Name	On behalf of company/organisation or individual
Joanne	Rawsthorne	NA
Georgia	Rawsthorne	NA
Lee	Rawsthorne	NA
Frances	Rawsthorne	NA
Nancy	Morris	NA
Dee	Shenton	NA
Stewart	Ramsden	NA
Victoria	Norton	NA
Susan	Hobbiss	NA
Gemma	Parker	NA
Karen	Kirby	NA
David	Lloyd	NA
Margaret	Plant	NA
Rachel	Mellish	NA
Maureen	Bamford	NA
Elizabeth	Hogan	NA

Gillian	Wolstencroft	NA
Helen	Weddell	NA
Alex	Cooper	NA
Emma	Galley	NA
Lee	Mountney	NA

Table 3. Row JPA31.16

First Name	Last Name	On behalf of company/organisation or individual
Ann	Cain	NA
Shirley	Brierley	NA
Peter	Simon	NA
Martin	Goddard	NA
Nicola	Hadley	NA
Nancy	Morris	NA
Michael	Hullock	NA
Marilyn	Jones	NA
John	Jones	NA
Stewart	Ramsden	NA
Caroline	Grimshaw	NA
Claire	Elliott	Save Tameside Greenbelt
Phil	Chadwick	NA
Andrea	Colbourne	NA
Karen	Kirby	NA
Lesley	Bardsley	NA
Adam	Rigby	NA
Rachael	Thomas	NA
Gareth	Birch	NA
Andrew	Richardson	NA
Kate	Jackson	NA
Janine	Ainley	NA

Ann	Guilfoyle	NA
Gillian	Wolstencroft	NA
AM	Wadsworth	NA
Patricia	Fletcher	NA
Yasmin	Etches	NA
Rebecca	Smith	NA
Adam	Kilkenny	NA
Emma	Galley	NA
Ian	Potts	NA
Richard	Jenkins	NA
Peter	Stanyer	NA
Michael	Young	NA
Paul	Roebuck	NA

Table 4. Row JPA31.21

First Name	Last Name	On behalf of company/organisation or individual
Ann	Cain	NA
Shirley	Brierley	NA
Peter	Simon	NA
Ellen	McInnes	NA
Martin	Goddard	NA
Stephen	Ormerod	NA
Nicola	Hadley	NA
Nancy	Morris	NA
Michael	Hullock	NA
E	Bowles	NA
Marilyn	Jones	NA
John	Jones	NA
Stewart	Ramsden	NA
Kim	Scragg	NA
Caroline	Grimshaw	NA

Kevin	Walsh	NA
Claire	Elliott	Save Tameside Greenbelt
Anne	Keighley	NA
Phil	Chadwick	NA
Gemma	Parker	NA
John	Walker	NA
Andrea	Colbourne	NA
Karen	Kirby	NA
Martin	Rigby	NA
Emma	Power	NA
Adam	Rigby	NA
Danny	Cullinane	NA
Ruth	Welsh	NA
Rachel	Mellish	NA
Gareth	Birch	NA
Christopher	Harper	NA
Joyce	Elliott	NA
Karen	Shreeve	NA
Kate	Jackson	NA
Janine	Ainley	NA
AM	Wadsworth	NA
Cathy	Ryan	NA
John	Pender	NA
Rebecca	Smith	NA
Ian	Potts	NA

Table 5. Row JPA31.22

First Name	Last Name	On behalf of company/organisation or individual
Shirley	Brierley	NA
Michael	Hullock	NA
E	Bowles	NA

John	Jones	NA
Kim	Scragg	NA
Kevin	Walsh	NA
Claire	Elliott	NA
Gareth	Birch	NA
Joyce	Elliott	NA
Rebecca	Smith	NA
Michael	Young	NA
Colin	Walters	NA

Table 6. Row JPA31.23

First Name	Last Name	On behalf of company/organisation or individual
Peter	Simon	NA
Michael	Hullock	NA
E	Bowles	NA
Kim	Scragg	NA
Caroline	Grimshaw	NA
Claire	Elliott	Save Tameside Greenbelt
Danny	Cullinane	NA
Gareth	Birch	NA
Joyce	Elliott	NA
Elizabeth	Hogan	NA
Ann	Guilfoyle	NA
Richard	Jenkins	NA
Barry	Elliott	NA
Karen	Blake	NA
Michael	Young	NA
Colin	Walters	NA

Table 7. Row JPA31.28

First Name	Last Name	On behalf of company/organisation or individual
Deborah	Wedlock	NA
Janet	Howarth	NA
Victoria	Norton	NA
Kim	Scragg	NA
Caroline	Grimshaw	NA
Kevin	Walsh	NA
Claire	Elliott	Save Tameside Greenbelt
Anne	Keighley	NA
Gareth	Birch	NA
Joyce	Elliott	NA
Ann	Guilfoyle	NA
Vicky	Harper	NA
Yasmin	Etches	NA
Deborah	Lynch	NA
Rebecca	Smith	NA
Emma	Galley	NA
Lee	Mountney	NA

Table 8. Row JPA31.31

First Name	Last Name	On behalf of company/organisation or individual
Ann	Cain	NA
Ellen	McInnes	NA
Martin	Goddard	NA
Nicola	Hadley	NA
Carolyne	Fletcher	NA
Nancy	Morris	NA
Michael	Hullock	NA

E	Bowles	NA
Marilyn	Jones	NA
John	Jones	NA
Kim	Scragg	NA
Caroline	Grimshaw	NA
Kevin	Walsh	NA
claire	elliott	Save Tameside Greenbelt
Anne	Keighley	NA
Phil	Chadwick	NA
Gemma	Parker	NA
Andrea	Colbourne	NA
Martin	Rigby	NA
Emma	Power	NA
Ruth	Welsh	NA
Rachel	Mellish	NA
Gareth	Birch	NA
Joyce	Elliott	NA
Karen	Shreeve	NA
Elizabeth	Hogan	NA
Andrew	Richardson	NA
Janine	Ainley	NA
Ann	Guilfoyle	NA
Gillian	Wolstencroft	NA
Patricia	Fletcher	NA
Helen	Weddell	NA
John	Pender	NA
Rebecca	SMITH	NA
Ian	Potts	NA
Richard	Jenkins	NA
Barry	Elliott	NA
Nicola	Shenton	NA
Colin	Walters	NA

Table 9. Row JPA31.33

First Name	Last Name	On behalf of company/organisation or individual
Martin	Goddard	NA
Carolyne	Fletcher	NA
Nancy	Morris	NA
Michael	Hullock	NA
E	Bowles	NA
Marilyn	Jones	NA
Sarah	Burlinson	NA
Caroline	Grimshaw	NA
Claire	Elliott	Save Tameside Greenbelt
Emma	Power	NA
Christopher	Harper	NA
Vicky	Harper	NA
Yasmin	Etches	NA
Lee	Mountney	NA
Richard	Jenkins	NA
Michael	Young	NA
Susan	Peat	NA
Colin	Walters	NA

Table 10. Row JPA31.34

First Name	Last Name	On behalf of company/organisation or individual
Martin	Goddard	NA
Paul	Gilbert	NA
Carolyne	Fletcher	NA
Nancy	Morris	NA
Michael	Hullock	NA
Sarah	Burlinson	NA
John	Jones	NA

Kim	Scragg	NA
Claire	Elliott	Save Tameside Greenbelt
Gemma	Parker	NA
Emma	Power	NA
Gareth	Birch	NA
Christopher	Harper	NA
Joyce	Elliott	NA
Alex	Ashton	NA
Janine	Ainley	NA
Ann	Guilfoyle	NA
Gillian	Wolstencroft	NA
AM	Wadsworth	NA
Patricia	Fletcher	NA
Helen	Weddell	NA
Vicky	Harper	NA
John	Pender	NA
Rebecca	Smith	NA
Ian	Potts	NA
Richard	Jenkins	NA
Karen	Blake	NA
Nicola	Shenton	NA
Michael	Young	NA
NA	NA	The Wildlife Trusts

Table 11. Row JPA31.44

First Name	Last Name	On behalf of company/organisation or individual
Marilyn	Jones	NA
Sarah	Burlinson	NA
John	Jones	NA
Claire	Elliott	Save Tameside Greenbelt

Phil	Chadwick	NA
Gemma	Parker	NA
Andrea	Colbourne	NA
Danny	Cullinane	NA
Joyce	Elliott	NA
Kate	Jackson	NA
Gillian	Wolstencroft	NA
AM	Wadsworth	NA
Helen	Weddell	NA
Yasmin	Etches	NA
John	Pender	NA
Adam	Kilkenny	NA
Richard	Jenkins	NA
Paul	Roebuck	NA

Table 12. Row JPA31.45

First Name	Last Name	On behalf of company/organisation or individual
Shirley	Brierley	NA
Carolyne	Fletcher	NA
Caroline	Grimshaw	NA
Claire	Elliott	Save Tameside Greenbelt
Anne	Keighley	NA
Phil	Chadwick	NA
Andrea	Colbourne	NA
Joyce	Elliott	NA
Kate	Jackson	NA
Patricia	Fletcher	NA
Helen	Weddell	NA
Vicky	Harper	NA
John	Pender	NA
Richard	Jenkins	NA

Susan	Peat	NA
Paul	Roebuck	NA
Colin	Walters	NA

Table 13. Row JPA31.46

First Name	Last Name	On behalf of company/organisation or individual
Ann	Cain	NA
Chantal	Johnson	NA
Nancy	Morris	NA
Michael	Hullock	NA
E	Bowles	NA
Claire	Elliott	Save Tameside Greenbelt
Rachel	Mellish	NA
Janine	Ainley	NA
Ann	Guilfoyle	NA
AM	Wadsworth	NA
Vicky	Harper	NA
John	Pender	NA
Richard	Jenkins	NA

Table 14. Row JPA31.55

First Name	Last Name	On behalf of company/organisation or individual
Jason	Allcroft	NA
Donna	Bamforth	NA
Carolyne	Fletcher	NA
Nancy	Morris	NA

Sarah	Burlinson	NA
John	Jones	NA
Victoria	Norton	NA
Kevin	Walsh	NA
Claire	Elliott	Save Tameside Greenbelt
Phil	Chadwick	NA
Andrea	Colbourne	NA
Karen	Kirby	NA
Danny	Cullinane	NA
Ruth	Welsh	NA
Rachael	Thomas	NA
Gareth	Birch	NA
Andrew	Richardson	NA
Ann	Guilfoyle	NA
Gillian	Wolstencroft	NA
Cathy	Ryan	NA
Adam	Kilkenny	NA
Ian	Potts	NA
Karen	Blake	NA
Michael	Young	NA

PfE 2021 Policy JP Allocation 32 South of Hyde

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Principle / scale of development:		
JPA32.1	General objection to the proposed allocation, which should not proceed and be deleted from the plan.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt Topic Paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.	For a full list of respondents see Appendix Table 1.
JPA32.2	The Plan is unsound because reasonable alternatives to Green Belt have not been considered, i.e. alternative urban brownfield land. Several brownfield sites were highlighted, including: former Two Trees School, Denton; land off Mottram Rd, Hattersley; and other former school sites. Therefore, the Plan is not robustly justified and should be modified to remove proposed allocations that are currently designated on land falling within the Green Belt with a focus made on smaller non-Green Belt locations.	<p>Alternative options to meet development needs are set out in the Growth and Spatial Options Paper [02.01.10]. The Green Belt Topic paper [07.01.25] sets out the alternatives considered prior to the release of Green Belt land and the site selection paper [03.04.01] sets out the process followed to identify the allocations in PfE, including the consideration of multiple sites to meet the identified needs.</p> <p>South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.</p> <p>The extent of brownfield land available within Tameside is clearly set out in the accompanying evidence base, including Tameside's Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register. Therefore, no change to the Plan is considered as necessary.</p>	Michael Young Simon Haughton Janine Ainley Simon Haughton Richard Wilson SGMGB - Save Apethorn & Bowlacre
JPA32.3	The reasons for refusal for various planning applications are based on UDP policies (OL1, OL2, N5 and the NPPF (Para 145) and that the proposed development would fail those policy tests.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt Topic Paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.	Michael Young Paul Roebuck David Morten

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply.</p> <p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and JPA32 policy points 21 and 22 set out a range of policy measures in relation to trees and woodland.</p>	
JPA32.4	The site selection process is unclear with no explanation as to why some call for sites are excluded.	South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Therefore, no change to the Plan is considered as necessary.	Phil Chadwick Andrea Colbourne Matthew Broadbent
JPA32.5	This policy is not sound because it is inconsistent with NPPF para 140. The case for exceptional circumstances under Site Selection Criteria 7 is flawed and the approach does not support the strategic objectives of the plan. Therefore, JPA32 should be deleted.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt Topic Paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.	David Morten Save Royton's Green Belt Community Group Save Apethorn & Bowlacre Green Belt Group
JPA32.6	Support for larger self-contained developments, such as JPA31 as they are a better way of minimising the impact on existing communities.	Support noted for policy JPA31.	Elizabeth Heptonstall
JPA32.7	Proposed allocations should be reassessed for their suitability for development. Those in the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed removed from the Plan.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt Topic Paper	Simon Haughton Vicky Harper

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		<p>[07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and therefore, no change to the Plan is considered as necessary.</p>	
JPA32.8	Exceptional circumstances should be explained, a timeline for proposed plans made available and the community genuinely informed.	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.</p> <p>The timeline for the proposed plan is set out in the adopted Tameside Local Development Scheme.</p>	Karen Blake
JPA32.9	Strong support for the proposed allocation. The submitted Development Framework demonstrates that the quantum of proposed housing can be delivered. Additional evidence, including a masterplan, show the site's suitability for delivering housing in an area of high demand, therefore contributing to meeting the Tameside and GM future housing need that cannot be met on brownfield sites.	Support is noted.	Bluemantle
JPA32.10	JPA32 scores poorly against the site selection criteria, whereas the land	South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential	Morris Homes

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	promoted at Lumb Lane in Ashton-under-Lyne scores highly and should be re-introduced as an allocation. Also, the site on its own cannot address the shortfall in housing supply in the early plan period and therefore other small sites are needed.	and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Therefore, no change to the Plan is considered as necessary.	
JPA32.11	The site boundary is well defined by natural features and provides a natural and effective boundary between development and countryside.	Support is noted.	Bluemantle
JPA32.12	Residents remain concerned that this allocation represents a gross scale of development wholly unacceptable to be accommodated within the local area, and will result in significant detrimental impact on the local environment.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and PfE Policy JPA 32 sets out within policy points 6, 7, 8, 10, 11, 12, 13, 14, 18, 19, 20, 21, 22 and 23 an approach that will ensure that the development of the allocation will have a positive impact on the area and the quality of life. Therefore, no change to the Plan is considered as necessary.	SGMGB - Save Apethorn & Bowlacre
	Housing (inc affordable housing):		
JPA32.13	Housing numbers are either unjustified or overestimated and should be reduced. Several responses suggested alternatives to the requirement, stating that the housing target is based on out of date ONS data, does not take into account the effects of Brexit or Covid and therefore the proposal should be deleted.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Phil Chadwick Andrea Colbourne Martin Rigby James Hudson Janine Ainley John Jones David Morten Daniel Heap Joyce Ogden Colin Walters Christopher Harper David Morten

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
			Save Apethorn & Bowlacre Green Belt Group
JPA32.14	Housing targets should not solely be considered as sufficient to meet the 'exceptional circumstances' criteria for re-designation of Green Belt and they must be genuinely deliverable and realistic using a practical approach that meets real need rather than one based on ambition and growth. In addition, a level of development should not be proposed that cannot be met on locally available sites.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	William Wragg MP
JPA32.15	A disproportionate level of growth is focused in the Hyde area. An explanation is needed of why such a large quantity of new housing rather than improving the existing town centres. It was also highlighted that Hyde has seen a higher level of housing development when compared to the other Tameside towns between 2015 and 2020.	PfE JPA32 does not consider the spatial distribution of development and policies need to be read across the Plan as a whole. Land supply is set out within the in Housing Topic Paper [06.01.03] and presented in the PfE Land Supply Data (Housing) spreadsheet [03.03.01] and is also available via Mapping GM . The Council will continue to review and update its land supply annually through its Strategic Housing and Economic Land Availability Assessment .	Susan Peat Karen Blake David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.16	General objection to the type of housing proposed, specifically to the lack of well designed affordable homes, larger 'Executive Homes' and the shortage of good quality family houses. Lack of affordable housing was also linked to developers challenging affordable housing commitments on viability grounds.	Policy JPA-32 policy point 2 specifies that the site will deliver homes across a range of types and tenures in accordance with the council's most up to date Housing Needs Assessment . Section E, part 25, of JPA32 Topic Paper [10.08.13] summarises the Stage 2 Strategic Viability Assessment [03.03.04]. As noted in the summary, the report concluded that the proposed development is viable taking account of mitigation measures and policy requirements. Therefore, no change to the policy is considered necessary.	Stephen Ormerod Andrew Richardson Janine Ainley Ann Guilfoyle Vicky Harper Karen Blake Michael Young John Jones

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA32.17	Ample housing exists in Gee Cross and additional housing would not provide affordable housing for locals.	Comment noted. No change to the Plan is considered as necessary.	Christopher Harper Vicky Harper Joyce Ogden
JPA32.18	Housing will lead to urban sprawl and is supported by a manipulative IA.	The scoring within the IA is considered to be in accordance with the framework set out in the IA Scoping Report [02.01.01] .	Caroline Grimshaw Steven Brown Tina Brown
JPA32.19	Some authorities have failed to meet their housing delivery targets and there is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere. However, the monitoring framework in Chapter 12 provides an appropriate level of detail for a strategic plan. More detailed monitoring will be incorporated as appropriate within district local plans.	Phil Chadwick Andrea Colbourne
JPA32.20	The site is suitable, deliverable and available with no constraints, has good transport links and could be delivered early in the plan period.	Comments noted supporting the deliverability of site.	Bluemantle
JPA32.21	Proposal is based on implementing best practice Garden City principles and creating a sustainable community, with the ability to deliver the full range of housing that meets the needs of Tameside and the area, including affordable housing, higher value larger family housing and custom and self-build opportunities that will address current shortages and diversify the housing market.	Support is noted.	Bluemantle
JPA32.22	There is no specific reference to an affordable housing requirement; this would be beneficial given that the policy only refers to providing a range of dwelling types and tenures.	Policy JPA-32 policy point 2 specifies that the site will deliver homes across a range of types and tenures in accordance with the council's most up to date Housing Needs Assessment and PfE policy JP-H 2 covers the principle of delivering new affordable housing. Therefore, no change to the Plan is considered as necessary.	Greater Manchester Housing Providers

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA32.23	No other sites are included, does this indicate a shortage of housing land supply in Tameside?	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Greater Manchester Housing Providers
JPA32.24	Development on the eastern parcel of the Bowlacre site will be out of character with the existing dwellings on Bowlacre and West Park. Therefore, if the allocation cannot be removed then it should be reduced in size to only include the western parcel of the Bowlacre site where the development will be in character with existing dwellings with better access to existing public transport on Stockport Road.	PfE Policy JPA-32 specifies at policy points 7 and 8 that any development needs to integrate with both the existing urban area and the landscape. Policy JPA-32 also specifies at policy point 9 that lower density development should be delivered as the site elevation increases towards the eastern extent. Therefore, no change to the Plan is considered as necessary.	Adam Cooper
JPA32.25	The proposal will lead to overlooking of existing dwellings and devalue existing property	Policy JPA-32 policy point 7 sets out that the character of, and interface between, new and existing development, such as dwellings and gardens are sensitively designed and acknowledged by development proposals. In addition, policy point 4 stipulates that any masterplanning, phasing strategy and design code approved through the Local Planning Authority should be developed through engagement with the local community. Therefore, no change to the Plan is considered as necessary.	Joanne Maffia
	Employment and Economy:		
JPA32.26	Lack of employment and local job opportunities means that the proposal is a dormitory development. Furthermore, there are no major partners or industries identified for employment provision and they should be. In addition, there is a limited supply of brownfield land for employment development in a borough with an already low employment density.	Through other policies in the Plan, PfE seeks to ensure that the jobs at locations across the plan area will be accessible. PfE Policy JP-J 1 aims to support long-term economic growth across all nine districts coupled with the priority in PfE Policy JP-C 1 of delivering an integrated transport network that keeps GM moving and drives prosperity. JPA32 Topic Paper [10.08.13] paras 23.5 to 23.9 highlight the role the allocation can play in delivering against the employment and skills agenda that is set out in Tameside's Inclusive Growth Strategy . The issue of identifying major partners or industries is not considered this is a matter within the scope of the plan.	Colin Walters Ann Guilfoyle Phil Chadwick Andrea Colbourne
JPA32.27	Development will help address the existing shortage of larger family homes, helping to	Support is noted.	Bluemantle

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	drive improvements to skills, services and economic opportunity.		
JPA32.28	The Plan does not take into account the effects of Covid on work patterns.	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] . Therefore, no change to the Plan is considered as necessary.	Phil Chadwick Andrea Colbourne
	Green Belt:		
JPA32.29	Object to the loss of Green Belt for a wide variety of reasons, with many stating that it was sacrosanct and should be protected.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.	For a full list of respondents see Appendix Table 2.
JPA32.30	Proposal conflicts with NPPF Green Belt policy and objectives and the draft Plan fails to provide a rational argument to support the release of Green Belt in order to meet housing targets, there are no exceptional circumstances presented and it should be considered as a fundamental constraint. In addition, disagree that the need to address a range of poor social outcomes is justification for removing the site from the Green Belt and that investment should be focussed on regeneration and previously developed land.	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>South of Hyde has been selected following the site selection methodology, the purpose of which, as set out in the Site Selection Background Paper [03.04.01] (Para 6.15), is to identify suitable locations for residential and employment development that are capable of achieving the plan's Vision, Objectives and Spatial Strategy and help meet the housing and employment land supply. Therefore, no change to the Plan is considered as necessary.</p>	Michael Young Dee Shenton Sarah Hudson-Dodds Janine Ainley David Morten Phil Chadwick Andrea Colbourne Claire Elliott Karen Blake Paul Roebuck SGMGB - Save Apethorn & Bowlacre
JPA32.31	The proposal will merge, or significantly narrow the gap, between Gee Cross/Hyde	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater	Sophie L E Bowles

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	with Woodley and conflicts with the original purpose of including the land in the Green Belt.	Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.	SGMGB - Save Apethorn & Bowlacre Richard Wilson Ruth Welsh David Morten Joyce Ogden Sheila Hannible
JPA32.32	Change in designation is driven by developer demand and not an actual need for the housing.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. Therefore, no change to the Plan is considered as necessary.	Emma Power
JPA32.33	Suggested that the inclusion of Green Belt additions is an attempt to massage the figures, is dishonest and deceitful. Many of the proposed additions do not meet the NPPF purposes of Green Belt and have a lower environmental and recreational value than the proposed allocation.	No change considered necessary. The approach in relation to the Green Belt additions is considered consistent with NPPF. The evidence provided in the Green Belt Topic Paper [07.01.25] (Appendix 3, pages 52-73) provides appropriate justification for the Green Belt Additions.	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.34	Following a review of the LUC Green Belt Assessment it is questionable whether they are competent in their assessment because their opinion changed on the role of the Green Belt parcels between the Stage 1 and Stage 2 assessments. Also highlighted that the LUC Stage 2 Assessment concluded that release of the allocation would	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base which can be found here: LUC Stage 1 Green Belt Assessment [07.01.04] ; and LUC Stage 2 Green Belt Study – Addendum Assessment of Proposed 2020 GMSF Allocations [07.01.10]	David Morten Save Apethorn & Bowlacre Green Belt Group

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	constitute moderate-high harm to the Green Belt.		
JPA32.35	The proposed mitigation to the harm, such as tree planting, is a cynical attempt to disguise the true harm of removing the land from the Green Belt.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Proposed mitigation is highlighted at paragraph 14.10 JPA32 Topic Paper [10.08.13] with further green infrastructure opportunities summarised at paragraphs 15.1 to 15.3.	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.36	Although new development is needed to fill the housing gap it should be delivered in a sensitive way and retain the Green Belt that is a barrier to urban sprawl and hugely valued by local people.	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>PfE Policy JPA-32 specifies at policy points 7 and 8 that any development needs to integrate with both the existing urban area and the landscape, whilst policy point 8 specifies the need to ensure that development edges successfully integrate into the adjoining landscape. Policy JPA-32 also specifies at policy point 9 that lower density development should be delivered as the site elevation increases towards the eastern extent. Therefore no change to the Plan is considered as necessary.</p>	William Wragg MP
JPA32.37	Proposal would see the strong character and history of these North Cheshire towns merged into a single built environment.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25] , is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.	Peter Stanyer
JPA32.38	Green Belt release is required and the proposals deal with the challenges and issues appropriately and sensitively. The opportunity exists for a strong new Green Belt boundary.	Support is noted.	Bluemantle

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Brownfield:		
JPA32.39	<p>Redevelopment of brownfield sites, empty/derelict properties and use of CPO powers and increasing Council Tax on vacant properties, were identified as alternatives that should be prioritised in order to deliver the new dwellings required. These options should be fully exhausted before development of Green Belt takes place. Some respondents identified that there was a large amount of brownfield land available, that the council had neglected to update its Brownfield Land Register and that sites were also missing from the register, such as the former ABC Wax site in Hyde. Therefore an up to date appraisal of brownfield land was needed.</p>	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.</p> <p>The extent of brownfield land available within Tameside is clearly set out in the accompanying evidence base, including Tameside’s Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register.</p> <p>Other measures identified as incentives for urban regeneration, such as increasing Council Tax are beyond the scope of PfE. Therefore, no change to the Plan is considered as necessary.</p>	For a full list of respondents see Appendix Table 3.
JPA32.40	<p>Releasing land for this contradicts the brownfield preference approach set out in the GMSF.</p>	<p>PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist.</p>	James Hudson
JPA32.41	<p>Brownfield options for affordable housing have been discarded or not explored. Modification of the Plan was proposed that emphasised development of current brownfield sites, alongside infrastructure improvements, for affordable homes.</p>	<p>The extent of brownfield land available within Tameside is clearly set out in the accompanying evidence base, including Tameside’s Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register.</p> <p>The approach taken to redeveloping brownfield sites is set out in PfE at paragraphs 1.41 to 1.49 and in Policy JP-S 1, which provides further focus and emphasises the preference given to using brownfield land and vacant buildings to meet development needs. PfE Policy JP-D 1 “Infrastructure Implementation” sets</p>	Rachael Thomas Janine Ainley

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		out the approach to ensuring this will happen by making best use of all appropriate delivery mechanisms. Therefore, no change to the Plan is considered as necessary.	
JPA32.42	Development of multiple smaller scale brownfield sites in order to meet housing need would be more acceptable to local residents than the proposed large-scale Green Belt development. The Brownfield Land Register identifies sites that could deliver housing in advance of the more complex PfE sites and Tameside Council owns many of these. Therefore, the council is in control of sites that could deliver housing early in the plan period and there is no need to release JPA32 from the Green Belt in order to deliver housing early in the Plan period.	PfE sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester, a limited amount of development is required on greenfield and Green Belt land such as at South of Hyde as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum. The Green Belt topic paper [07.01.25], is reflected in the South of Hyde Allocation Topic Paper [10.08.13] and sets out the strategic and local case for exceptional circumstances which are considered to exist. The extent of brownfield land available within Tameside is clearly set out in the accompanying evidence base, including Tameside's Strategic Housing and Economic Land Availability Assessment and Brownfield Land Register .	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.43	CPRE primarily support the effective use of brownfield land, but state that where there is not enough suitable brownfield land, they accept that urban extensions might be necessary, and they welcome a master-planned approach.	Support noted.	CPRE
	Transport – Highways / Public Transport / Cycling / Walking:		
JPA32.44	Roads are already very congested in the area due to commuter traffic. This has been compounded by recent development even without the additional burden that will be generated by the increase in traffic from the proposed development and future growth.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that significant adverse affects of the allocation can be appropriately ameliorated	For a full list of respondents please see Appendix Table 4.

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	It was also not demonstrated how the impact on road traffic would be mitigated and this should take place before Green Belt is released.	with final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13] .	
JPA32.45	Road safety was highlighted as an increasing issue for all road users, with increased levels of traffic making it more difficult for horse riders and pedestrians to cross Stockport Road. Therefore, better facilities, including a crossing, should be provided on the A560.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that significant adverse affects of the allocation can be appropriately ameliorated with final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13] . These include a number of necessary local walking and cycling measures, including that all pedestrian and cycle networks internal to the allocation, as well as connecting PRoW, should be built or upgraded to the standards outlined in the Bee Network, as well as providing connections to the nearest section of the Bee Network.	For a full list of respondents please see Appendix Table 5.
JPA32.46	Development will cause a negative impact on existing walking routes.	PfE Policy JPA-32 recognises the need to ensure neighbourhoods are walkable, that active travel is promoted to be the most attractive form of local transport, that public rights of way including the Cown Edge Way are incorporated and enhanced, and that connectivity is generally enhanced within the locality, therefore no change to the Plan is considered as necessary.	Stephen Ormerod
JPA32.47	Narrow main roads and existing rail bridges are highway constraints which cannot easily be resolved.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that significant adverse effects of the allocation can be appropriately ameliorated with final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13] .	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.48	A wide range of issues were identified in relation public transport. These were	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14]	Adam Cooper E Bowles

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>primarily focused on it being unreliable, inadequate or absent and with no capacity or plans for improvement to support the existing population or the proposed development. Improvements to public transport were seen as both essential and in urgent.</p> <p>Many respondents highlighted the physical and access limitations of Woodley Station and that there were no plans to expand this or to bring metrolink services to the area.</p> <p>It was also noted by some, that planning gain could not provide for the upgrades required to the station, such as expanded car parking.</p>	<p>which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate and the locality assessment demonstrates that significant adverse effects of the allocation can be appropriately ameliorated with final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13].</p> <p>The GM Transport Strategy Our Five Year Delivery Plan 2021-2026 [09.01.02] sets out a range of interventions in the short term (pages 279 – 299).</p> <p>Additionally The GM Transport Strategy: Appendix 1 Right Mix Technical Note [09.01.03] clarifies the approach to achieving the ‘Right Mix’ transport vision of reducing car’s share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling.</p>	<p>Michael Young Colin Walters Kevin Walsh Richard Wilson Joyce Ogden Colin Walters SGMGB - Save Apethorn & Bowlacre David Morten Karen Blake Martin Longbottom Elizabeth Heptonstall Rachel Mellish Save Apethorn & Bowlacre Green Belt Group</p>
JPA32.49	<p>Given the scale of the proposed development issues such as access to services, facilities and public transport should be at the forefront of the decision making process. The aim should be to reduce the demand for road-based travel, which increases all forms of pollution, and introduce new active travel routes to connect to the Peak Forest Canal, TPT and Werneth Low Country Park.</p>	<p>No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate and policy point 19 specifically refers to enhancing connectivity to existing key assets, including the Peak Forest Canal, Trans Pennine Trails and Werneth Low Country Park. The locality assessment demonstrates that significant adverse effects of the allocation can be appropriately ameliorated and suggests a range of options for necessary public transport improvements, including bus improvements on the A560 and a range of cycling and walking measures that will allow for easier access to public transport and local services. Final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13].</p>	<p>SGMGB - Save Apethorn & Bowlacre CPRE</p>

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		The GM Transport Strategy: Appendix 1 Right Mix Technical Note [09.01.03] clarifies the approach to achieving the 'Right Mix' transport vision of reducing car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling.	
JPA32.50	Questions why traffic monitoring was only done over a holiday period, was this data published and if so where?	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] and Transport Locality Assessment Addendum [09.01.26] .	James Hudson
JPA32.51	The suggested mitigations to address the traffic flow capacity are flawed, will not work and they will not stand up to the tests of soundness. Also the listed transport measures are only identified as potential and not everyone wants to cycle or use the bus.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Transport Locality Assessment [09.01.14] which has been undertaken to assess impact on highway infrastructure and set out potential mitigation options to ensure the requirements of national planning policy are met. JPA 32 policy point 13 requires the provision of developer contributions toward transport infrastructure as appropriate. The locality assessment demonstrates that significant adverse effects of the allocation can be appropriately ameliorated and suggests a range of options for necessary public transport improvements, including bus improvements on the A560 and a range of cycling and walking measures that will allow for easier access to public transport and local services. Final mitigation measures determined by more detailed Transport Assessment at the application stage. This is summarised in chapter 10 of the South of Hyde Allocation Topic Paper [10.08.13] . The GM Transport Strategy: Appendix 1 Right Mix Technical Note [09.01.03] clarifies the approach to achieving the 'Right Mix' transport vision of reducing car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling.	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.52	Respondent highlights the discrepancy between PfE and the TfGM Transport Masterplan and GM Clean Air Plan because the proposed allocations will increase traffic levels and therefore contribute to increased Nitrogen Oxide levels.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Local Authorities and TfGM have a clear policy expected to transform travel patterns in GM and help achieve the "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. This 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] . PfE policy JP-S 6 'Clean Air' highlights that a comprehensive range of measures will be taken to support improvements in air quality. Many of these are focused on new development and as such they will be a material consideration at the planning application stage.	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.53	Insufficient consultation on the effect on traffic in the region.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Karen Blake

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JPA32.54	Welcome the reference to development being required to promote active travel and enhance connectivity as set out in points 17 and 19 of Policy JP Allocation 32, and in particular reference to the Peak Forest Canal.	Support noted.	Canal & River Trust
JPA32.55	Trans Pennine Trail highlighted that schemes should be designed to meet both LTN1/20 and bridleway standards where applicable and that cycle storage should also accommodate adapted cycles to ensure access for all is provided.	Suggested detailed specifications would be appropriate at the planning application stage Therefore no change to the Plan is considered as necessary.	Trans Pennine Trail
JPA32.56	National Highways commented that "At this stage, it is WSP's opinion that the transport evidence underpinning this allocation is incomplete and does not identify in sufficient detail, the nature, scale and timing of the infrastructure requirements at the SRN; or what future assessments and studies that will be required to determine any such infrastructure requirements."	<p>The Transport Locality Assessments (Tameside Allocations – GMSF2020) [09.01.14] and Transport Locality Assessments Addendum [09.01.26] provide detailed information on the nature, scale and timing of infrastructure requirements at the Strategic Road Network (SRN).</p> <p>The report states that all sites associated with the allocations will be expected to prepare a Transport Assessment as part of a planning application to develop final, rather than indicative proposals, which mitigate the impact of the site. The full scope of the Transport Assessments will be determined by the Local Planning Authority (in consultation with the Local Highway Authority and National Highways) on a site-by-site basis, depending on the nature, scale and timing of the application, in accordance with the NPPF.</p> <p>In addition, the Local Authorities and TfGM have a clear policy direction and major programme of investment in sustainable transport which is expected to transform travel patterns in GM and help achieve our "Right Mix" vision of no net increase in motor-vehicle traffic by 2040. Our transport strategy is set out in 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
JPA32.57	A number of points were highlighted: 1. Both parts of the site would be accessed directly onto the A560 and the traffic flow	Support noted.	Bluemantle

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	<p>generated by the development would not have a significant impact on traffic flows;</p> <p>2. Site is in a highly sustainable location with a genuine choice of alternative transport modes; and</p> <p>3. Proposal will deliver a permeable layout that maximises linkages both within the site and to the wider area.</p>		
	Physical Infrastructure and utilities:		
JPA32.58	There are electricity, water and wastewater capacity issues and no budget in place for improvements. Also pointed out that additional housing would place additional strain on infrastructure resources and that the infrastructure needed reviewing before this happened.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE Policy JPA32 policy point 5 specifies the need for an integrated and co-ordinated approach to infrastructure to support the scale of the whole development. Section 13 of JPA32 Topic Paper [10.08.13] states that there are no known infrastructure or capacity constraints identified by the utilities undertakers.	For a full list of respondents please see Appendix Table 6.
JPA32.59	Clear delivery plans for infrastructure should be included.	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE Policy JPA32 policy point 5 specifies the need for an integrated and co-ordinated approach to infrastructure to support the scale of the whole development. PfE Policy JP-D 1 “Infrastructure Implementation” sets out the approach to ensuring this will happen by making best use of all appropriate delivery mechanisms.	Phil Chadwick Andrea Colbourne
JPA32.60	Bluemantle point out that limited up front infrastructure is required to bring the site forward and that they support the integrated approach to infrastructure provision set out in Policy JPA32.	Support noted.	Bluemantle
JPA32.61	New dwellings should be required to meet the higher National Housing Standard for water consumption of 110 litres per person per day or any subsequent replacement national standard. Non-domestic buildings	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

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	will be expected to incorporate water saving measures and equipment in accordance with the requirements of BREEAM or any other best practice targets as appropriate.		
	Social Infrastructure:		
JPA32.62	<p>Many objections to the proposal, as there is not enough infrastructure for the current population and local amenities are at 'breaking point'. An influx of new residents will undoubtedly put strain on healthcare, schools, and other vital facilities (including those in Stockport) and there are no plans to build additional social infrastructure, therefore investment is required before any development takes place to increase services to an acceptable level.</p> <p>Furthermore, one respondent thought that planning gain would be insufficient to bring forward such improvements for the existing and extra population.</p>	<p>No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Section D, part 23 of JPA32 Topic Paper [10.08.13] covers social infrastructure and highlights that planning school places is a dynamic process and is therefore regularly refreshed.. Whilst there is no site-specific requirement for education provision or mitigation, financial contributions will be required towards off-site education provision. This is also supported by the approach set out in PfE Policy JP-P 5 on Education, Skills and Knowledge.</p> <p>Section D, part 24 of the JPA32 Topic Paper [10.08.13] highlights that the proposed allocation is not likely to generate the need for on-site health provision, however the developer should engage with the Clinical Commissioning Group at an early stage in order to determine health care requirements associated with the development. This is also supported by the approach set out in PfE Policy JP-P 6 on Health.</p> <p>Also a number of policies across PfE provide a sufficient policy framework to address other social infrastructure matters, such as Policies, JP-G6, JP-P1, JP-P7 and JP- D1 which states that new development must be supported by the necessary infrastructure, including where appropriate green spaces and sports facilities, schools and medical facilities.</p>	For a full list of respondents please see Appendix Table 7.
JPA32.63	Police cuts have been significant and concerned about crime rates and anti-social behaviour.	Comment not relevant to the content of policy JPA32 and this matter is beyond the scope of Places for Everyone.	Colin Walters
JPA32.64	During the period 2015-2020 there has been no increase in school capacity in Hyde.	Section D, part 23 of JPA32 Topic Paper [10.08.13] covers social infrastructure and highlights that planning school places is a dynamic process and is therefore regularly refreshed. This is also supported by the approach set out in PfE Policy JP-P 5 on Education, Skills and Knowledge.	David Morten Save Apethorn & Bowlacre Green Belt Group
	Environmental – Green Infrastructure, Biodiversity, open space:		

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JPA32.65	440 homes in this space will have a significant impact on local wildlife and ecology and a wide range of important habitats, flora and fauna would be lost or damaged because of the proposal and therefore ecological assessments are essential and should be carried out over a year. It was also felt that there would only be biodiversity net loss.	Section C, part 18 of JPA32 Topic Paper [10.08.13] covers ecological and biological assessment. No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base including a Preliminary Ecological Appraisal [insert ref]. This allowed for gathering of data to establish existing conditions, a baseline for future monitoring and appraise notable features present, and include scoping for notable species or habitats which may be constraints on development. This established that there were no known ecological constraints which are so important so as to preclude allocation of the site. However, ecological mitigation and compensation will likely be needed at the application stage to avoid harm to important habitats and species which are known to be present. There are further opportunities for biodiversity net gain through on-site environmental improvement and habitat creation.	For a full list of respondents please see Appendix Table 8.
JPA32.66	The area provides the only green open space and walking routes to the east of the A560, between Hyde and Stockport. It is an important green corridor linking into the wider ecosystem separating Hyde and from Woodley. This joins the Werneth Low country park to the Haughton Dale nature reserve, and allows access to the wider countryside.	Section C, part 18 of JPA32 Topic Paper [10.08.13] acknowledges the presence of Pole Bank SBI and potential priority habitat types. Further work is recommended to inform any planning application including an extended Phase 1 habitat survey and there would be a presumption against the loss of the Local Wildlife Site or any woodland. PfE Policy JPA 32 policy point 16 sets out that neighbourhoods should be green, walkable and safe places whilst policy point 18 specifies that existing public rights of way will be retained. In addition policy point 19 states that connectivity to the highlighted amenity assets will be enhanced whilst policy point 23 sets out the approach to providing different typologies of open space.	John Jones Emma Power Sarah Hudson-Dodds Joyce Ogden Michael Young David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.67	The proposals contradict Chapter 8 'A Greener Greater Manchester' and Strategic Objective 8 (Improving the natural environment and green spaces).	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. Policy JPA32 recognises the policies in PfE Chapter 8 through policy points 6, 8, 20, 21, 22 and 23 requiring development of the site to incorporate a range of mitigation measures relating to landscape, biodiversity and open space as appropriate. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with policies in PfE Chapter 8 'Greener Places' and Strategic Objective 8. Therefore, no change to the Plan is considered as necessary.	Joyce Ogden
JPA32.68	Green space, nature reserves and woodlands are needed for the local population's physical and mental health. Building on this Green Belt will have a	No change to the Plan is considered as necessary. Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Section C, part 16 of JPA32 Topic Paper [10.08.13] acknowledges the importance of recreation opportunities and access to open space and highlights the role	Colin Walters Caroline Grimshaw Joyce Ogden Sheila Hannible

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	negative impact on local residents quality of life and contribute to the wider mental health crisis.	<p>played by the Integrated Assessment in assessing allocations against the need to support improved health and wellbeing of the population and reducing health inequalities.</p> <p>PfE Policy JPA 32 policy point 23 sets out the approach to providing different typologies of open space within the allocation whilst policy point 19 states that connectivity to the nearby amenity assets, such as Werneth Low, will be enhanced. Policy point 16 sets out that neighbourhoods should be green, walkable and safe places whilst policy point 18 specifies that existing public rights of way will be retained.</p> <p>PfE Policy JPA 32 policy point 20 establishes that the Pole Bank SBI will be protected and enhanced, whilst Policy point 21 provides additional policy requiring the protection and enhancement of other key landscape and ecological features. The policy also covers at policy point 16 that neighbourhoods should be green, walkable and safe places whilst policy point 18 specifies that existing public rights of way will be retained and policy point 23 specifies that land should be set aside for a range of public open spaces including natural space.</p>	<p>Emma Power Adam Rigby Rachael Thomas Christopher Harper Sarah Hudson-Dodds Vicky Harper Yasmin Etches Michael Hullock</p>
JPA32.69	Creating new recreation areas, cycle paths and walking areas will not compensate for building on Green Belt land.	Policy JPA32 recognises through policy points 16, 17, 18, 19, 22 and 23 the requirement for development of the site to incorporate a range of mitigation measures relating to open space, recreation areas and walking and cycling opportunities. Therefore, no change to the Plan is considered as necessary.	<p>Kathryn Ann Smith Karen Blake</p>
JPA32.70	Development will ruin the landscape and lead to a loss of identity, character, views/vistas and the semi-rural characteristics of the Gee Cross area. It is not demonstrated that this adverse impact can be suitably mitigated.	Section C, part 17 of JPA32 Topic Paper [10.08.13] summarises the landscape character of the sites location and highlights the potential for mitigation through the careful siting of development, tree planting, conserving key views and the introduction of sustainable urban drainage systems. PfE Policy JPA32 reflects this approach and will ensure that the landscape and visual impact of the new development is minimised through policy points 6, 8, 9 and 23. Therefore, no change to the Plan is considered as necessary.	<p>Stephen Ormerod Kevin Walsh James Hudson SGMGB - Save Apethorn & Bowlacre</p>
JPA32.71	The design led masterplanned approach will not lead to Green Belt coalescence and is sensitive to existing development and landscape features. It also identifies the proposed delivery of greenspace, recreation space and a walking and cycling network linked into the countryside and existing recreation routes.	Comment noted.	Bluemantle

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JPA32.72	Disagrees with the description of the site because it downplays its greenfield and rural characteristics. It is also visible from a significant number of vantage points.	Section A, part 3 of JPA32 Topic Paper [10.08.13] gives an overview of the site characteristics including that the site is largely designated Green Belt (98%), includes a Site of Biological Importance, Ancient Woodland and protected trees. In addition, the description states that the allocation is primarily used for grazing, although it does highlight a number of structures being present within the site boundary. Therefore, no change to the Plan is considered as necessary.	SGMGB - Save Apethorn & Bowlacre
JPA32.73	A number of issues were raised in relation to the Agricultural Land Quality assessment of the site. Principally, confirmation is sought on the level of independent analysis undertaken and whether DEFRA agree with the report's conclusions and the issue is raised that the ALC categorisation identifies some of the land as urban within the proposed allocation, which is incorrect.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Section B, part 12 of JPA32 Topic Paper [10.08.13] covers ground conditions for the allocation and notes that the site is primarily used for grazing and is recorded as being a mix of grade 3, 4 and urban under the national Agricultural Land Classification (ALC). The issue of the extent of the ALC categories was highlighted during the 2019 GMSF consultation and as a result more detailed assessments of the ALC, one for each of the site parcels, have been provided They confirm the land quality as Grade 3b or lower [10.08.09] and 10.08.10 . Therefore no change to the Plan is considered as necessary.	SGMGB - Save Apethorn & Bowlacre
JPA32.74	The proposals to build on green space will also add to the climate crisis.	The evidence, aims and objectives of both the Our People, Our Place The Greater Manchester Strategy and 5-Year Environment Plan for Greater Manchester 2019-2024 have informed policy on climate change throughout PfE. PfE Section 5 Sustainable and Resilient Places and Section 7 Greener Places aim to mitigate impacts on climate change, carbon, air quality and natural habitats by incorporating measures, recommendations and targets set out in the 5-Year Environment Plan for Greater Manchester 2019-2024. Therefore no change to the Plan is considered as necessary.	David Morten Yasmin Etches Glyn Shepherd Save Apethorn & Bowlacre Green Belt Group
JPA32.75	Pole Bank SBI needed better protection.	Section C, part 18 of JPA32 Topic Paper [10.08.13] covers ecological and biological assessment and highlights that the Greater Manchester Ecology Unit (GMEU) undertook a Preliminary Ecological Appraisal of the site. This appraisal acknowledges the inclusion of part of the Pole Bank Local Wildlife Site and highlights this as a potential constraint on development as there would be a presumption against the loss of part of the Local Wildlife Site. Furthermore, PfE Policy JPA 32 policy point 20 establishes that the Pole Bank SBI will be protected and enhanced.	CPRE
JPA32.76	No development will take place on Bowlacre Clough Wood, the Pole Bank SBI, other protected areas and important landscape features will be retained and enhanced with around 40% of the site comprising woodland	Comment noted.	Bluemantle

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	and green open space. All these ecological constraints have helped shape the indicative masterplan and they support the policy wording for JPA 32.		
JPA32.77	Proposal will deliver a well-planned, high quality development that sensitively integrates into the existing landscape and character of Gee Cross and the adjoining countryside. Furthermore, the indicative masterplan includes a variety of types of open space that will provide opportunities for informal recreation and children's play.	Comment noted.	Bluemantle
JPA32.78	<p>The Wildlife Trust recommend that allocation policy JPA32 is unsound on four grounds, because:</p> <ol style="list-style-type: none"> 1. The site incorporates Pole Bank SBI and this should be excluded; 2. Of the inclusion of an area of Ancient Woodland (Pole Bank North SBI); 3. It contains examples of potential priority habitats; and 4. Evidence suggest that the site is visited by BoCC red listed birds and other priority species and also contains habitats suitable for badger and water vole. 	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. Section C, part 18 of JPA32 Topic Paper [10.08.13] covers ecological and biological assessment and highlights that the Greater Manchester Ecology Unit (GMEU) undertook a Preliminary Ecological Appraisal of the site. This allowed for gathering of data to establish existing conditions, a baseline for future monitoring and appraise notable features present and include scoping for notable species or habitats which may be constraints on development. This allowed GMEU to make recommendations for ecological mitigation and the conclusion was that there were no known ecological constraints which are so important so as to preclude allocation of the site. However, ecological mitigation and compensation will likely be needed to avoid harm to important habitats and species which are known to be present. Through this appraisal the Local Wildlife Site (Site of Biological Importance) at Pole Bank was identified alongside the potential presence of protected and priority habitats and species.</p> <p>Section C, part 15 of JPA32 Topic Paper [10.08.13] covers Green Infrastructure (GI) and highlights the opportunities identified to enhance the beneficial use of the Green Belt and the allocation policy aim of seeking to incorporate GI into the site by taking an integrated approach at the masterplanning stage. The appraisal also recommends that further surveys are conducted, including an Extended Phase 1 Habitat Survey in addition to a number of species surveys. There are further opportunities for biodiversity net gain through on-site environmental improvement and habitat creation at the application stage. Therefore, no change to the Plan is considered as necessary.</p>	The Wildlife Trust for Lancashire, Manchester & North Merseyside

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Air Quality:		
JPA32.79	Proposed development will generate both extra traffic and domestic emissions that contribute to air pollution and concern was expressed for the health of new residents and the existing population. The link between air pollution and respiratory conditions was also highlighted and the increase in traffic emissions would be detrimental to the health of asthma sufferers. This is contrary to the Council's pledge for better air quality and is contradictory to the aims of the GMAQAP.	Section D, part 24 of JPA32 Topic Paper [10.08.13] highlights the role of a Health Impact Assessment focused on enhancing the potential positive impacts of the proposal while avoiding or minimising the negative impacts and there should be a particular focus on disadvantaged sections of communities that may be affected. PfE policy JP-S 6 sets out a comprehensive range of measures to support improvements in air quality across the Plan as a whole. And as part of the evidence to support a planning application both an Air Quality Assessment and Noise Assessment will be required. The promotion of active travel and the inclusion of public transport to support the allocation are included within the allocation policy. 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. Therefore no change to the Plan is considered as necessary.	Nicola Shenton Colin Walters Steven Brown Tina Brown Christopher Harper Karen Shreeve Vicky Harper Kathryn Ann Smith SGMGB - Save Apethorn & Bowlacre Richard Wilson Emma Power
JPA32.80	The site currently acts a buffer for traffic pollution and it would be more use if it were planted with trees to combat carbon emissions.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base. PfE policy JP-S 6 sets out a comprehensive range of measures to support improvements in air quality across the Plan as a whole. PfE Policy JP Allocation 32 includes a number of policy measures that aim to make active travel the most attractive form of local transport and to retain and enhance existing woodland and trees whilst also delivering a high quality public realm that includes street trees. Therefore no change to the Plan is considered as necessary.	Colin Walters
	Flood Risk:		
JPA32.81	Existing flood risk documents produced by Stockport Council and Tameside Council are highlighted t that the site is in an area of high risk for surface water flooding and new properties developed will be at risk of flooding.	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Strategic Flood Risk Assessment has been undertaken. Section B, part 11 of JPA32 Topic Paper [10.08.13] summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) [04.02.01] and the 2020 Level 2 SFRA [04.02.18]. The Level 2 SFRA concluded that 9% of the site could be subject to a flood depth of 40mm. In response to this a range of potential mitigation measures have been identified, including directing development to areas within Flood Zone 1 and maintaining an 8m no development buffer to Bowlacre Brook. Therefore, the SFRA indicates that the allocation is developable, subject to mitigation measures. Therefore, no change to the Plan is considered as necessary.	David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.82	Proposed development may affect surface water flooding issues as there have been at	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Strategic Flood Risk Assessment has been undertaken. Section B, part 11 of JPA32 Topic Paper	Steven Brown Tina Brown

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>the Broadmeadow Drive development despite the implementation of mitigation measures. The presence of watercourses and springs was highlighted alongside the importance of the area in absorbing rainfall, its drainage function and preventing flooding. A general dissatisfaction was expressed because of insufficient clarity on safeguarding and mitigation measures identified to justify the allocation of the site and recommend an updated assessment is undertaken and highlight the YouTube video made by residents showing flooding issues.</p>	<p>[10.08.13] summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) [04.02.01] and the 2020 Level 2 SFRA [04.02.18]. The Level 2 SFRA concluded that 9% of the site could be subject to a flood depth of 40mm. In response to this a range of potential mitigation measures have been identified, including directing development to areas within Flood Zone 1 and maintaining an 8m no development buffer to Bowlacre Brook. Therefore, the SFRA indicates that the allocation is developable, subject to mitigation measures and the submission of a site specific Flood Risk Assessment at the planning application stage in accordance with national policy and guidance. PfE Policy JP-S 5 'Flood Risk and the Water Environment' provides further detailed policy in relation to flood risk. Therefore, no change to the Plan is considered as necessary.</p>	<p>Emma Power E Bowles Rachel Mellish Janine Ainley David Morten SGMGB - Save Apethorn & Bowlacre Karen Shreeve Vicky Harper Save Apethorn & Bowlacre Green Belt Group</p>
JPA32.83	<p>Disruption of watercourses is a criminal offence should flooding occur after development has taken place and that the GMCA have a legal obligation to minimise any risk of flooding. It was also highlighted that the council has been aware of flooding issues since 1993.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base as a Strategic Flood Risk Assessment has been undertaken. Section B, part 11 of JPA32 Topic Paper [10.08.13] summarises the outcomes and recommendations of the 2019 Level 1 Strategic Flood Risk Assessment (SFRA) [04.02.01] and the 2020 Level 2 SFRA [04.02.18]. a range of potential mitigation measures have been identified, including directing development to areas within Flood Zone 1 and maintaining an 8m no development buffer to Bowlacre Brook. Therefore, the SFRA indicates that the allocation is developable, subject to mitigation measures and the submission of a site specific Flood Risk Assessment at the planning application stage in accordance with national policy and guidance. PfE Policy JP-S 5 'Flood Risk and the Water Environment' provides further detailed policy in relation to flood risk. Therefore, no change to the Plan is considered as necessary.</p>	<p>David Morten Save Apethorn & Bowlacre Green Belt Group Adam Cooper</p>
JPA32.84	<p>Site promoter highlighted that the proposal will incorporate SuDs principles.</p>	<p>Comments noted.</p>	<p>Bluemantle</p>
JPA32.85	<p>Policy wording should be amended to ensure that sustainable drainage systems are fully incorporated into the development, discharging in accordance with the hierarchy of drainage options and designed in accordance with nationally recognised</p>	<p>No change is considered necessary. A Strategic Flood Risk Assessment has been undertaken [04.02.01] across the plan, identifying the allocation as more vulnerable to flood risk and the need for a site specific Flood Risk Assessment [04.02.11] at the planning application stage in accordance with national policy and guidance. PfE Policy JP-S5 provides further detailed policy in relation to Flood Risk. Therefore, the Plan as a whole, is considered to provide an appropriate policy framework to deal with this matter and no change is considered necessary.</p>	<p>United Utilities Group PLC</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	<p>SuDS design standards. Natural and multi-functional SuDS should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and connect to the wider green and blue infrastructure network.</p> <p>In addition, there should be a clear allocation-wide strategy for foul and surface water management, demonstrating 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.</p>	<p>JPA 32 policy point 5 sets out that an integrated and co-ordinated approach to infrastructure to support the scale of the whole development should be taken. This is explained further at paragraphs 11.308 by stating that this should include a site wide drainage strategy and at 11.309 by outlining the measures required to achieve green field run-off rates, including sustainable drainage systems.</p>	
	Heritage:		
JPA32.86	<p>The Grade II* listed Apethorn Farm, Apethorn Lane and early mill buildings are historically significant, therefore object to surrounding it with development as this would destroy, rather than conserve and enhance, its historic character. Presence of other designated and non-designated heritage assets was also noted and it was proposed that the harm to the historic environment has not been sufficiently evaluated.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and Section C Part 20 of JPA32 Topic Paper [10.08.13] summarises the South of Hyde Historic Environment Assessment [10.08.08] (HEA) conducted by The Centre for Applied Archaeology at the University of Salford. As a result of this evidence PfE Policy JPA32 was revised and policy points 10, 11 and 12 now cover the issues identified in the Historic Environment Assessment. A Heritage Impact Assessment (HIA) will also be required to support the masterplanning of the site and any subsequent planning applications and it will ensure the proposed new development has a positive impact on the heritage asset's conservation and setting.</p> <p>The Grade II* Apethorn Farmhouse together with the curtilage listed outbuildings are the main built heritage concern and the assessment recommends that that a Heritage Impact Assessment (HIA) be undertaken to secure their sensitive restoration and, long term future reuse. The HEA also recommends that those areas of archaeological potential identified in the assessment be subject to a programme of field investigations early in the planning process. Therefore, no change to the Plan is considered as necessary.</p>	<p>Sarah Hudson-Dodds James Hudson SGMGB - Save Apethorn & Bowlacre David Morten Save Apethorn & Bowlacre Green Belt Group</p>

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA32.87	<p>Supportive of the re-use of the at risk grade II* Apethorn Farm complex and objects to the removal of the wording around enabling development that was included in the 2016 GMSF. Justification of an allocation of this scale on that basis is unreasonable and disproportionate. Planning permission for redevelopment of the farm complex has previously been granted without the need for the significant scale of proposed development.</p> <p>Suggest the Grade II* Apethorn Farm complex could be restored without the proposed housing rather than as justification for the site selection. If not viable a nearby site was identified as potential enabling development. This would remove the need for Green Belt release and protect the rural setting of the farm.</p>	<p>Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and Section C Part 20 of JPA32 Topic Paper [10.08.13] summarises the South of Hyde Historic Environment Assessment [10.08.08] (HEA) conducted by The Centre for Applied Archaeology at the University of Salford. As a result of this evidence PfE Policy JPA32 was revised and policy points 10, 11 and 12 now cover the issues identified in the Historic Environment Assessment. A Heritage Impact Assessment (HIA) will also be required to support the masterplanning of the site and any subsequent planning applications and it will ensure the proposed new development has a positive impact on the heritage asset's conservation and setting. The policy wording, as currently set out for policy points 10 and 12, is considered to comply with the requirements of section 16 of the NPPF.</p> <p>The approach to site selection is summarised in Section A, Part 5 of JPA32 Topic Paper [10.08.13] which highlights the purpose of the methodology as identifying the most sustainable locations for residential development that can meet PfE's Vision, Objectives and Spatial Strategy and help meet the housing land supply. Therefore, the identification of the allocation is not solely based on the need to restore the Grade II* Apethorn Farm complex and no change to the Plan is considered as necessary.</p>	SGMGB - Save Apethorn & Bowlacre David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.88	Proposed development will fully restore and secure the long-term conservation of the Grade II* at risk listed Apethorn Farmhouse complex and the Development Framework shows the new development back from the listed building.	Support noted.	Bluemantle
JPA32.89	Whilst supporting the heritage related elements of policy JPA32, rewording is required so that policy point 10 aligns with the requirements of the NPPF. In addition	Allocation of the site is supported by what is considered to be a proportionate and appropriate evidence base and no change is considered necessary. Whilst support for the heritage related elements of policy JPA32 is welcomed, the policy wording, as currently set out for policy points 10 and 12, is considered to comply with the requirements of section 16 of the NPPF.	Bluemantle

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	there is suggested replacement wording for policy point 12.		
JPA32.90	Historic England support the wording of this allocation.	Support noted.	Historic England
	Other:		
JPA32.91	Tameside residents already suffer from high levels of obesity, heart disease, poor mental health, stress etc.	Section D, Part 24 of JPA32 Topic Paper [10.08.13] highlights the role of a Health Impact Assessment as supporting evidence for any subsequent planning application. It goes on to note that it should focus on the positive impacts of the proposal while avoiding or minimising the negative impacts and there should be a particular focus on disadvantaged sections of communities that may be affected.	Colin Walters
JPA32.92	There would be increased light and noise pollution.	Section C, Part 22 of JPA32 Topic Paper [10.08.13] highlights that a noise assessment will be required to be submitted as part of the planning application process. Paragraph 185 of the NPPF highlights that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Therefore appropriate assessment will be required at the application stage to mitigate unacceptable impacts and no change is considered necessary to the plan.	Glyn Shepherd
JPA32.93	Hyde town centre was the focus of a number of comments stating variously that there was no focus on its regeneration and that this was essential to stimulate demand, retain businesses, attract shoppers and to improve the life of local residents.	Section D, Part 23 of JPA32 Topic Paper [10.08.13] highlights the opportunity to provide a key housing development site in close proximity to the services, amenities and public transport facilities offered by Hyde town centre. The close proximity will also increase demand for the town centre offer and will contribute to the aim identified in Tameside Council's Inclusive Growth Strategy for the regeneration of Hyde town centre as a key element of the Hyde Triangle Project. The Council will also continue to seek funding to pursue regeneration opportunities. Therefore no change to the Plan is considered as necessary.	Susan Peat Colin Walters Janet Howarth Adam Rigby
JPA32.94	Changes in working practices mean that there is likely to be large amounts of vacant office floorspace in the future and this could provide opportunities for brownfield residential development thereby supporting town centres. At the same time, Green Belt proposals could be paused to allow for an assessment of economic impacts and the release of new census data.	PfE explains the approach of the brownfield preference at paragraphs 1.41 to 1.49 and highlights that 90% of housing will be delivered in the urban area. Policy JP-S 1 provides further focus to this policy approach and emphasises the preference given to using brownfield land and vacant buildings to meet development needs. PfE paragraphs 7.4 to 7.7 summarises the approach to calculating housing need, which has been derived following the standard methodology provided in the NPPG. It also notes the impact caused by the Covid-19 global pandemic and highlights that an assessments carried out on the potential impacts on the housing market revealed that there is insufficient evidence to suggest that the Plan should not be seeking to meet	David Morten Save Apethorn & Bowlacre Green Belt Group

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		the overall housing need. Furthermore this section notes that a further delay in plan making could have a negative impact on the future planning of the conurbation and therefore on its recovery. Therefore, no change to the Plan is considered as necessary.	
JPA32.95	<p>Overall criticism of the consultation process and the lack of community engagement, including:</p> <ul style="list-style-type: none"> • It should be carried out in line with the SCI; • Process landowner and developer led; • Consultation period too short; • Transparency of the process; • Complexity of consultation material and process; • It ignores residents views; and • Lack of inclusiveness (particularly elderly and non-computer users). 	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	<p>Michael Young Jason Allcroft Anne Keighley Phil Chadwick Andrea Colbourne Rachael Thomas Paul Roebuck Kevin Walsh Dasvid Morten John Jones Janine Ainley Karen Blake Save Apethorn & Bowlacre Green Belt Group</p>
JPA32.96	How does this address climate change, reduce carbon emissions and congestion? It is not close to major rail links and motorways. In addition, the statutory duty to address climate change and its impacts through the Local Plan was highlighted.	Greater Manchester's vision is to become a carbon neutral city by 2038. 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 to address climate change that supports the aim of delivering a carbon neutral Greater Manchester by 2038 and that new development will be net zero carbon from 2028. The GM Transport Strategy: Appendix 1 Right Mix Technical Note [09.01.03] clarifies the approach to achieving the 'Right Mix' transport vision of reducing car's share of trips to no more than 50%, with the remaining 50% made by public transport, walking and cycling. Therefore, no change is considered as necessary.	<p>Stephen Ormerod Richard Wilson CPRE Rachael Thomas</p>
JPA32.97	Contradicts Strategic Objective 2 - Creating neighbourhoods of choice.	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. Policy JPA32 recognises the need to create neighbourhoods of choice through policy points 16, 17, 18 and 19 requiring development of the site ensure neighbourhoods are green and walkable, promote active travel, incorporate and enhance existing public rights of way and enhance connectivity to	Michael Hullock

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
		existing communities and key assets. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with Strategic Objective 2 of the plan.	
JPA32.98	Contradicts Strategic Objective 10 (promote the health and wellbeing of communities)	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. Policy JPA32 recognises the need to promote the health and wellbeing of communities through policy points 13, 17, 18, 19 and 23. These require development of the site ensure neighbourhoods are safe, green and walkable, promote active travel, incorporate and enhance existing public rights of way, enhance and connectivity to existing communities and key assets, and provide for a range of public open spaces. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with Strategic Objective 10 of the plan.	Joyce Ogden
JPA32.99	The proposed development directly conflicts current policies on green belt, environment, flood protection, infrastructure, woodland and wildlife protection.	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 that addresses matters such as those in the representation. Policy JPA32 recognises the issues highlighted in the response at policy points 4, 5, 13, 20, 21, 22 and 23. These require development of the site to be in accordance with a comprehensive masterplan (including a site wide drainage strategy), take an integrated approach to infrastructure, provide developer contributions towards infrastructure, protect and enhance ecological and landscape assets, incorporate street trees and set aside land for a variety of public open spaces. Therefore, it is considered that development at this site, which is in accordance with the allocation policy, would be in accordance with Strategic Objective 10 of the plan.	E Bowles Rachael Thomas
JPA32.100	There is nothing that can make the proposals legal and that further evidence covering wildlife, environment, flooding, transport and social infrastructure would confirm this.	It is considered that an appropriate and proportionate evidence base has been provided to support the policy as is highlighted in JPA32 Topic Paper [10.08.13] and therefore no change is considered as necessary.	Phil Chadwick Andrea Colbourne
JPA32.101	Respondent highlights the range of legal obligations that the Plan is required to meet, including: Duty to Co-operate and the Planning and Compulsory Purchase Act 2004. Also there details on how the Duty to	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Phil Chadwick Andrea Colbourne

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	Cooperate has been done or will be achieved with neighbouring authorities, including Stockport.		
JPA32.102	Questionable whether PfE and the GMSF can be treated as the same plan and the legality of the transition needs to be decided in court before PfE can proceed further. It cannot be assumed that Regulation 18 is automatically satisfied for PfE. Suggests that only a judicial review can establish whether the changes between the GMSF and PfE are not significant and therefore not substantial.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Phil Chadwick Andrea Colbourne
JPA32.103	Suggestion that the focus on legalities is intentional and intended to deter objections and confuse people responding.	Comment not relevant to the content of policy JPA32 and this matter addressed elsewhere.	Andrew Richardson Ann Guilfoyle
JPA32.104	The Plan will not create sustainable communities and is contrary to the GM Clean Air Plan.	<p>PfE policy JP-P 1 'Sustainable Places' sets a clear policy framework with the key aim of raising the quality of places in a way that is sustainable in the long-term. In addition PfE policy JP-S 6 'Clean Air' highlights a comprehensive range of measures will be taken to support improvements in air quality. Many of these are focused on new development and as such they will be a material consideration at the planning application stage.</p> <p>Air quality is a key issue against which the Plan is assessed within the IA: Integrated Assessment of GMSF Scoping Report 2021 [02.01.01] Section 5.10, page 206 and IA GMSF Main Report 2020 [02.01.02] page 426 and IA GMSF Addendum [02.01.05] page 294. Therefore, no change to the Plan is considered as necessary.</p>	Phil Chadwick Andrea Colbourne David Morten Save Apethorn & Bowlacre Green Belt Group
JPA32.105	There are no details available on when Local Plans will be available.	Comment not relevant to the content of the JPA32 and this matter addressed in the adopted Tameside Local Development Scheme .	Phil Chadwick Andrea Colbourne James Hudson
JPA32.106	Minerals Safeguarding Areas and Minerals Infrastructure Safeguarding are not shown	The Greater Manchester Joint Minerals Development Plan (GMJM DP) is not being amended as part of PfE. Mineral Safeguarding Areas, and the policies which cover them, are identified within the GMJM DP	Mineral Products Association

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
	on the plan. General plan-wide comments made on need to safeguard mineral resources which is not addressed adequately in the plan.	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.	SGMGB - Save Apethorn & Bowlacre
JPA32.107	Highlights the identification of part of the site in a MSA for brick clay and coal and suggests that sterilising these assets is inappropriate and unsound.	Section B, part 12, of JPA32 Topic Paper [10.08.13] notes the presence of the Mineral Safeguarding Area for brick clay and coal as set out in the GM Joint Minerals Plan. The presence of this mineral resource does not preclude identification of the potential allocation and any future development would need to address the policy requirements set out in the current GM Joint Minerals Plan or any replacement for it.	SGMGB - Save Apethorn & Bowlacre
JPA32.108	The proximity of historic landfill and ground fuel storage tanks was highlighted adjacent to the site raising issues of potential leaching. The risk to groundwater from disturbing these sources was also identified as a concern.	Section B, part 12, of JPA32 Topic Paper [10.08.13] highlights the presence of two small areas of landfill that fall wholly outside of the red edge and the presence of above and below ground fuel storage tanks. However, the topic paper points out that there is no knowledge of the ground conditions or any contaminated land reporting on the site and recommends that a range of reports are prepared before any planning application is proposed for the site.	SGMGB - Save Apethorn & Bowlacre
JPA32.109	In its current state, the proposal will be unviable due to the required developer contributions and the cost of remediation. Therefore, a greater quantum of development will be needed and this will exacerbate local problems.	Allocation of the site is considered to be supported by a proportionate and appropriate evidence base. Section E, part 25, of JPA32 Topic Paper [10.08.13] summarises the Stage 2 Strategic Viability Assessment [03.03.04] . As noted in the summary, the report concluded that the proposed development is viable taking account of mitigation measures and policy requirements. Therefore no change to the policy is considered necessary.	SGMGB - Save Apethorn & Bowlacre
JPA32.110	The proposed development may change statistics but it does so without lifting anybody out of poverty.	Comment noted - Delivering inclusive growth across the city region is a central theme of PfE, with everyone sharing in the benefits of rising prosperity. Therefore, it is important to read the policies across the Plan as a whole and no change to the policy is considered as necessary.	Colin Walters
JPA32.111	An impartial review of the Plan is needed that scrutinises the contradictions between the proposed development and policies covering Green Belt, Infrastructure, etc.	The Planning Inspectors appointed to carry out the independent Examination in Public by the Secretary of State will consider PfE and all the submitted representations.	Sarah Hudson-Dodds James Hudson
JPA32.112	The belief that developer contribution will be a solution is flawed and it will not stand up to the tests of soundness.	PfE Policy JPA32 at policy point 13 highlights the requirement for developer contributions towards a range of infrastructure requirements as deemed appropriate. This approach is supported in more detail under Policy JP-D 2 'Developer Contributions' which sets out a clear approach regarding the provision of mitigation measures. Therefore, no change to the Plan is considered necessary.	David Morten Save Apethorn & Bowlacre Green Belt Group

Row	Summary of main issues raised to PfE2021	Summary response to main issues raised to PfE2021	Respondent name(s)
JPA32.113	The proposal makes commitments on council funds without support from local residents.	Comment not relevant to the content of the JPA32 as there is no reference within the policy to committing council funds. Therefore, no change to the Plan is considered necessary.	Karen Blake
JPA32.114	The respondent highlighted a wide range of negative issues with the previous development of the former Stockport Rd college site.	Comment noted. No change to the policy is considered as necessary.	Kathryn Ann Smith
JPA32.115	Canal and River Trust highlighted that there is a spelling error in point 19 "Forrest" should be "Forest".	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
JPA32.116	The proposed allocation has the ability to create an attractive, vibrant and innovative new community based upon best practice and sustainable Garden City principles and that the indicative masterplan shows how the proposal responds sensitively to existing properties.	Support noted.	Bluemantle
JPA32.117	Support policy points 6, 13 and 14 of JPA32.	Support noted.	Bluemantle

Appendix

Respondents to PfE 2021 Policy JP Allocation 32 South of Hyde

Table 1 Row JPA32.1

First Name	Last Name	On behalf of company/organisation or individual
Martin	Longbottom	NA
Stephen	Ormerod	NA
John	Jones	NA
Caroline	Grimshaw	NA
Matthew	Broadbent	Save Royton's Greenbelt Community Group
Paul	Kallee-Grover	SGMGB - Save Apethorn & Bowlacre
Martin	Rigby	NA
Richard	Wilson	NA
Ruth	Welsh	NA
Claire	Elliott	Save Tameside Greenbelt
Andrew	Richardson	NA
Yasmin	Etches	NA
John	Pender	NA
Adam	Cooper	NA
Lee	Mountney	NA
Janet	Howarth	NA
Phil	Chadwick	NA
Andrea	Colbourne	NA
David	Morten	NA
Daniel	Heap	Save Apethorn & Bowlacre Green Belt Group

Table 2 Row JPA32.29

First Name	Last Name	On behalf of company/organisation or individual
Nicola	Shenton	NA
Peter	Stanyer	NA
Joanne	Rawsthorne	NA
Georgia	Rawsthorne	NA
Lee	Rawsthorne	NA
Frances	Rawsthorne	NA
Dee	Shenton	NA
Sarah	Burlinson	NA
Kevin	Walsh	NA
David	Lloyd	NA
Margaret	Plant	NA
Rachel	Mellish	NA
Claire	Elliott	Save Tameside Green Belt
Ann	Guilfoyle	NA
John	Pender	NA
Martin	Longbottom	NA
William	Wragg MP	NA
John	Jones	NA
Steven	Brown	NA
Tina	Brown	NA
Janet	Howarth	NA
Kim	Scragg	NA
Karen	Blake	NA
Richard	Wilson	NA
Jackie	Copley	CPRE
Joyce	Ogden	NA
Sarah	Hudson-Dodds	NA
Alex	Cooper	NA
Paul	Kallee-Grover	SGMGB - Save Apethorn & Bowlacre

Table 3 Row JPA32.39

First Name	Last Name	On behalf of company/organisation or individual
Michael	Young	NA
Paukl	Roebuck	NA
Michael	Hullock	NA
Kevin	Walsh	NA
Martin	Rigby	NA
Emma	Power	NA
Andrew	Richardson	NA
Ann	Guilfoyle	NA
David	Morten	NA
Daniel	Heap	Save Apethorn and Bowlacre Green Belt Group
Yasmin	Etches	NA
Emma	Galley	NA
Kathryn Ann	Smith	NA
Janine	Ainley	NA
Sarah	Hudson-Dodds	NA
Joyce	Ogden	NA
Karen	Blake	NA
William	Wragg MP	NA
Adam	Rigby	NA

Table 4 Row JPA32.44

First Name	Last Name	On behalf of company/organisation or individual
E	Bowles	NA
Kevin	Walsh	NA
Steven	Brown	NA
Tina	Brown	NA
Emma	Power	NA
Ruth	Welsh	NA

Rachel	Mellish	NA
Christopher	Harper	NA
Vicky	Harper	NA
Sarah	Hudson-Dodds	NA
Elizabeth	Heptonstall	NA
Karen	Shreeve	NA
Janine	Ainley	NA
David	Morten	NA
Daniel	Heap	Save Apethorn and Bowlacre Green Belt Group
Joyce	Ogden	NA
Adam	Cooper	NA
Karen	Blake	NA
Martin	Longbottom	NA
Glyn	Shepherd	NA
Sheila	Hannible	NA
Kathryn Ann	Smith	NA
Richard	Wilson	NA
William	Wragg MP	NA
Colin	Walters	NA
John	Jones	NA

Table 5 Row JPA32.45

First Name	Last Name	On behalf of company/organisation or individual
Michael	Young	NA
Paul	Roebuck	NA
Michael	Hullock	NA
Kevin	Walsh	NA
Martin	Rigby	NA
Emma	Power	NA
Andrew	Richardson	NA
Ann	Guilfoyle	NA

David	Morten	NA
Daniel	Heap	Save Apethorn and Bowlacre Green Belt Group
Yasmin	Etches	NA
Emma	Galley	NA
Kathryn Ann	Smith	NA

Table 6 Row JPA32.58.

First Name	Last Name	On behalf of company/organisation or individual
Martin	Longbottom	NA
Paul	Kallee-Grover	SGMGB - Save Apethorn & Bowlacre
Deborah	Wedlock	NA
Janet	Howarth	NA
Caroline	Grimshaw	NA
Yasmin	Etches	NA
Andrea	Colbourne	NA
Phil	Chadwick	NA
Adam	Rigby	NA
Kevin	Walsh	NA
Sheila	Hannible	NA
Karen	Blake	NA

Table 7 Row JPA32.62.

First Name	Last Name	On behalf of company/organisation or individual
E	Bowles	NA
John	Jones	NA
Martin	Rigby	NA
Steven	Brown	NA
Tina	Brown	NA
Ruth	Welsh	NA
Rachel	Mellish	NA

Sarah	Hudson-Dodds	NA
Andrew	Richardson	NA
Ann	Guilfoyle	NA
David	Morten	NA
Susan	Peat	NA
Paul	Kallee-Grover	SGMGB - Save Apethorn & Bowlacre
Emma	Power	NA
Vicky	Harper	NA
Yasmin	Etches	NA
Joyce	Ogden	NA
Sheila	Hannible	NA
Elizabeth	Heptonstall	NA
Kevin	Walsh	NA
Janine	Ainley	NA
Richard	Wilson	NA
William	Wragg MP	NA
Phil	Chadwick	NA
Andrea	Colbourne	NA
Colin	Walters	NA

Table 8 Row JPA32.65

First Name	Last Name	On behalf of company/organisation or individual
Michael	Young	NA
Kevin	Walsh	NA
Emma	Power	NA
Adam	Rigby	NA
Christopher	Harper	NA
Karen	Shreeve	NA
Janine	Ainley	NA
Ann	Guilfoyle	NA
David	Morten	NA

Daniel	Heap	Save Apethorn & Bowlacre Green Belt Group
Vicky	Harper	NA
Kathryn Ann	Smith	NA
Stephen	Ormerod	NA
John	Pender	NA
John	Jones	NA
Karen	Blake	NA
Paul	Kallee-Grover	SGMGB - Save Apethorn & Bowlacre
Richard	Wilson	NA