

Trows Farm, Rochdale

Greater Manchester Spatial Framework

Representations to revised draft plan
2019

indigo.

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**Greater Manchester Spatial
Framework**

Representations to revised draft plan
2019

March 2019

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Appendices

Appendix 1

Site Location Plan

Appendix 2

Latest Draft Illustrative Masterplan

1. Introduction (Questions 1- 5)

- 1.1. We write on behalf of GLP Ltd to make representations to the revised draft 2019 Greater Manchester Spatial Framework (GMSF).
- 1.2. GLP, alongside a national housebuilder, are promoting land at Trows Farm, Rochdale (draft allocation 29) for a residential scheme of circa 560 – 600 dwellings and are in the process of preparing a joint planning application. A Site Location Plan is enclosed at **Appendix 1**.
- 1.3. A significant amount of baseline survey work has been carried out at the site which is now informing the design evolution of the scheme. This is alongside continued pre-application discussions and engagement with the Council.
- 1.4. An Environmental Impact Assessment (EIA) Screening Request for a scheme of up to 600 dwellings has been submitted to Rochdale Borough Council (the Council) who subsequently responded confirming that developing the site for 600 dwellings will not give rise to significant effects on the environment and that the proposal is not EIA development.
- 1.5. There is strong support, in principle, for the proposed allocation of the site (draft allocation 29). However, there are concerns with some of the accompanying site specific policy requirements as to how the site should come forward. A key issue being, the lack of evidence underpinning some of draft policy suggestions, showing that little consideration has been given to site or scheme specific circumstances. These concerns are discussed further in subsequent sections.
- 1.6. This report re-iterates the site's deliverability and demonstrates that there are no site constraints preventing residential development being delivered on the site in the short term.
- 1.7. Delivering housing at the site will result in significant economic, social and environmental benefits to the local area and community helping to boost the Castleton area of Rochdale. This represents a real opportunity to widen housing choice in a suitable and sustainable location and boost Rochdale's overall delivery of housing.
- 1.8. Therefore, it is vital that this site continues to be included as a future housing allocation as the GMSF progresses given that it forms an essential part of Rochdale's future housing strategy. To quote from the draft GMSF, *"the site...provides an excellent opportunity to widen housing choice in a sustainable location"* (paragraph 11.182). This opportunity should be supported and encouraged through a housing allocation and suitably worded policy which enables the site to be delivered viably and maximising its full potential so that it can make a real contribution to meeting housing needs and boosting the current offer in the local area.

Questions 1 – What type of respondent are you?

- 1.9. These representations have been prepared by Indigo Planning Ltd on behalf of GLP Ltd.

Question 2 – Contact Details

- 1.10. Please use the following details if you need to contact Indigo Planning:

Amy James
Indigo Planning
St James' Tower
7 Charlotte Street
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M1 4DZ

Email: amy.james@indigoplanning.com

Tel: 0161 836 6910

Question 3 – Are you over the age of 13?

- 1.11. I can confirm that the above contact is over the age of 13.

Question 4 – If you're submitting a response on behalf of an organisation or group, please also give us their details

- 1.12. The representations are submitted on behalf of GLP Ltd. The contact details for this organisation is c/o of the agent, Indigo Planning.

Question 5 – We would like to be able to publish responses after this consultation closes. Are you happy for us to do this?

- 1.13. Yes.
- 1.14. What follows are site specific representations responding to the proposed allocation of Trows Farm, Rochdale.

2. Draft GM Allocation 29 - Trows Farm (Question 109)

Question 109 – Do you agree with the proposed policy GM Allocation 29: Trows Farm?

- 2.1. We strongly support the identification of the Trows Farm site (draft GM Allocation 29) as a future housing allocation. It should be carried forward into future iterations of the GMSF and formally adopted as an allocation. However, there is concern and objection to some elements of the draft policy supporting the proposed allocation.

Deliverability - Suitability and Sustainable Development

- 2.1. In accordance with Annex 2 of the National Planning Policy Framework (NPPF) (February 2019), for a site to be considered deliverable it should, be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing can be delivered on the site within five years.
- 2.2. The Trows Farm site is deliverable and meets the criteria of the definition contained within Annex 2. This is also the conclusion reached at paragraph 11.182 of the draft GMSF.

Availability

- 2.3. The site is in single ownership and is available now. There are no landownership constraints that would hinder the delivery of development at the site in the short term. It is being promoted jointly by the landowners (GLP Ltd) and a national housebuilder who are willing to bring the site forward for development now.

Suitability

- 2.4. The site is strategically well placed to deliver additional development, being located at the junction of the A627(M) leading into the centre of Rochdale and the M62 heading across to Huddersfield and on to the M60 Manchester Ring Road. On a more local level, the site is sustainably located, with the services and facilities in Castleton within easy reach of the site by walking and cycling and also a range of public transport options including Castleton Railway and the bus corridor along Manchester Road.
- 2.5. The suitability of the site to accommodate future housing has already been established through the identification of the site as a housing allocation, which is supported.
- 2.6. There is agreement with the reasoned justification that *“this site provides an excellent opportunity to widen housing choice in a sustainable location”* (draft GMSF paragraph 11.182). It is a logical and sustainable extension to Castleton to help meet future development needs and is extremely well related to existing development, in particular housing to the west.
- 2.7. Whilst it is currently allocated as protected open land and partially a greenspace corridor, it lies outside the green belt. It represents an opportunity to meet some of the development needs of the Borough without having to release green belt land.
- 2.8. As shown on the latest draft illustrative masterplan (**Appendix 2**), there is scope to deliver a scheme of around 562 dwellings and still be able to accommodate areas of greenspace and respect any ecological features of importance.
- 2.9. The site is well contained and encapsulated by development, with strong boundaries. It has existing development to the north and west and abuts the A627(M) and M62 to the east and

south. The fact the site is well contained with strong physical boundaries, means that its development would not encroach into the open countryside. In short, it forms a logical urban extension.

- 2.10. A number of technical and baseline survey work has already been carried out at the site. A summary of this work and the initial findings is set out below, which demonstrates that there are no technical constraints to delivering housing at the site in the short term. This represents a commitment to developing the site.

Landscape

- 2.11. The site is not located within a 'sensitive area'. It is also well screened and enclosed by existing development and infrastructure, therefore, the development will not have any negative impacts on the surrounding landscape.
- 2.12. Current proposals show how a linear park could be located along the western boundary of the site which would assist in providing a significant landscape buffer between the proposed development and the existing housing on Leander Drive.

Ecology

- 2.13. A Phase I Extended Habitat Survey has already been undertaken at the site. The site contains a mix of habitats including semi-improved neutral grassland, poor semi-improved grassland and marshy grassland with scrub, bracken and invasive Indian balsam.
- 2.14. The site does not lie within any statutory or non-statutory designed sites of nature conservation. It is unlikely that Great Crested Newts are present on site, with no further assessment of this species required.
- 2.15. The limited trees on site provide little opportunity for roosting bats and it is considered that any development on the site is unlikely to result in a negative effect on the local bat population.
- 2.16. Further ecological surveys are being carried out to ensure that suitable mitigation strategies are prepared so the development of the site will not have a detrimental impact upon biodiversity. However, there are no ecological features present on site that would prevent development from coming forward.

Flooding and drainage

- 2.17. In accordance with the Environment Agency Flood Risk Maps, the site is shown as being located wholly within Flood Zone 1. Therefore, developing the site for housing will not have an adverse impact on flood risk.
- 2.18. A suitable drainage solution for the site is evolving alongside the overall site layout proposals.

Traffic and transport

- 2.19. The current layout proposes vehicular access is achieved via Cowm Top Lane from an access taken off Queensway. Provision of an emergency access off Trows Lane is currently being explored.
- 2.20. Initial traffic survey work indicates that the effects of additional traffic generated by the development of the site is unlikely to be significant as these will be localised with the frequency of the effects relating to peak traffic flows on the local road network.
- 2.21. As set out above, the site is in a sustainable location in relation to the availability of walking and cycling facilities and public transport provision. Therefore, residents of the proposed

scheme would be encouraged to utilise the various public transport options available within the vicinity of the site, reducing reliance on the use of private vehicles.

Air quality

- 2.22. Whilst the A627(M) and M62 to the east and south of the site, respectively, are designated Air Quality Management Areas (AQMAs), in-design mitigation measures will be incorporated within the development to ensure sensitive receptors are not potentially exposed to poor air quality. Furthermore, exhaust emissions associated with the additional traffic generated by the development is not expected to result in significant adverse impacts.

Noise

- 2.23. Initial noise survey work has been carried out and concluded that on the basis of the measured sound pressure levels, the site is suitable for residential development subject to incorporation of good acoustic design and, where required, appropriate noise mitigation measures.

Ground conditions

- 2.24. No significant potential natural or man-made sources of pollution have been identified within or adjacent to the site. Based on the work carried out to date, any potential impacts to sensitive receptors, may be adequately managed through the use of normal environmental controls, occupational hygiene measures and practices typically associated with engineering earthworks projects.

Topography

- 2.25. The topography of the site will necessitate re-engineering of gradients to achieve development platforms at a cost to delivering the development. However, this will be considered as part of the overall landscaping framework strategy and as suggested by the draft GMSF utilised where possible “to deliver a visually interesting scheme”. Surveys undertaken indicate that through a cut and fill exercise and retaining features that the site can be made ready for development.

Achievability

- 2.26. A joint application is currently being prepared by GLP Ltd and a national housebuilder, who are ready to take the site forward in the short term.
- 2.27. There are also no other technical constraints that would prevent development being delivered at this site and technical reports are in the process of being finalised to evidence this.

Scheme Benefits

- 2.28. There are a number of benefits that will be realised for the local area and Borough as a result of developing the site for housing. The significant economic, social and environmental benefits, based on an illustrative scheme of 562 dwellings coming forward, could potentially include:
- Provision of a mix of housing, including family homes to help address the local needs of existing residents and the forecast requirements for more housing across the Borough over the next five years;
 - Delivery of high-quality and some executive homes to broaden the housing offer of the Borough, to complement the smaller and more affordable homes available;
 - Provision of an extensive area of accessible public open space, green corridors and amenity space of around 6 -7 acres (inclusive of linear park) available for new and existing residents;

- Creation of a linear park to provide connectivity to surrounding open spaces and also to act as a buffer to the existing residential development on Leander Drive;
- Opening up the site to public use (currently all private) with new links through the site to surrounding paths and bridleways to the north, south and west of the site;
- Improved links and habitat to complement the lodges and water bodies along Trows Lane; and
- Provision of a substantial financial contribution towards the highways and surface water drainage works at Cowm Top which will result in solving the current adoption issues associated with the road, thereby resolving a current Council problem to the benefit of the wider area.

The scheme also brings wider investment and public benefits, including (again based on a scheme of 562 dwellings):

- Increased Council Tax funding estimated to be £1,043,853 per annum based on Band D properties and the 2019/20 charge of £1,857.39 per annum, to facilitate the Council in continually improving on existing services, facilities and infrastructure;
- Generation of approximately £4.17m in New Homes Bonus monies for the Council over a four year period (circa £1.04m per annum);
- Injection of significant expenditure from new residents to support existing local shops and services. Indigo Planning estimates that the gross additional household expenditure generated will be around £10,058,000 per annum based at 2017 prices. Assuming 25% of this will be spent outside the Rochdale economy, the net additional household expenditure generated will be in excess of £7.54m per annum;
- Support from a larger population to ensure the future vitality and viability of existing services and facilities including voluntary community groups and organisations;
- New residents to increase patronage and assist in ensuring the future viability of existing transport links; and
- Should the need for such be demonstrated, S106 contributions to improve access to Castleton Station, to enhance its use for sustainable community, and contributions to support local infrastructure, schools and other amenities.

- 2.29. The site is, therefore deliverable and represents sustainable development, offering a range of economic, social and environmental benefits.

Draft allocation policy requirements

Dwelling yield

- 2.30. There is strong objection to the suggestion that the site can only accommodate 360 new dwellings as this is considered to be too low for a highly sustainable site of this size. The use of a greenfield site must yield greater densities to make use of such available resources.
- 2.31. The NPPF is clear that *“planning policies and decisions should support development that makes efficient use of land”* (paragraph 122) and that this should take account of a number of factors including:
- Identified need for different types of housing and other forms of development, and the availability of land suitable to accommodate it;
 - The availability and capacity of infrastructure and services; and
 - Promoting regeneration and change.
- 2.32. The site is described at paragraph 11.182 of the draft GMSF as providing *“an excellent opportunity to widen housing choice in a sustainable location...and offers the potential to regenerate Castleton in the longer term”*. Therefore, it is clear that the site is considered to be suitable for housing.
- 2.33. Given the draft GMSF considers the site is capable of assisting in meeting the needs for different types of housing, it is sustainably located and will assist in regenerating Castleton,

as per NPPF paragraph 122, the draft allocation should seek to ensure that it allows for the proposed development of the site to make efficient use of all of the land.

- 2.34. In addition, the NPPF also advises that where there is an existing or anticipated shortage of land for meeting identified housing needs that *“it is especially important that planning policies and decisions should avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site”* (paragraph 123).
- 2.35. Furthermore, the site was included as a draft allocation in the 2016 GMSF draft, noting it had capacity to deliver up to 500 new homes. Therefore, the Council, and Greater Manchester Combined Authority (GMCA), have previously acknowledged that the site is suitable for accommodating a greater number of dwellings than is proposed in the current draft version.
- 2.36. What is absent from the justification for the 2019 proposed allocation is why the suggested dwelling yield is so low at 360 dwellings. Progressing with this reduced dwelling yield is an unsound approach, as the draft policy has not been positively prepared or justified as it is not based on a proportionate evidence base.
- 2.37. Draft GMSF policy GM-H 4 suggests a minimum net residential density of 35 dwellings per hectare. If this was to be applied to this site, then it would generate a scheme of 700 dwellings. However, detailed site surveys including ground investigations, ecological walkovers, have been carried out and taking site constraints (primarily the presence of the gas main along the western boundary) into account, it has been demonstrated that the site can accommodate a scheme of up 500 - 600 dwellings.
- 2.38. An Environmental Impact Assessment Screening Request for a scheme of up to 600 dwellings has been submitted to the Council who subsequently responded confirming that developing the site for 600 dwellings will not give rise to significant effects on the environment and would not constitute EIA development.
- 2.39. This demonstrates that the site can, in technical and environmental terms, accommodate a larger proportion of dwellings than is suggested by the draft allocation.
- 2.40. The current scheme being promoted jointly by the landowner and a national housebuilder is for 562 dwellings. This scheme is based on the site survey work carried out and the housebuilders knowledge of the local market and the type of housing which is required to meet the current local needs.
- 2.41. It is assumed that the reduction in dwelling yield from the 2016 draft GMSF allocation is due to the now suggested provision of an on-site primary school, which was absent from the previous draft allocation. However, this has not been explained anywhere and neither has how the inclusion of an on-site primary school equates to the loss of 140 dwellings.
- 2.42. Further comments on the suggested provision of an on-site primary school are set out below.
- 2.43. The Site Allocations Topic Paper accompanying the draft GMSF sets out that releasing Protected Open Land (POL) is sequentially preferable to releasing green belt land. However, if no such land is identified at the first stage of site search work then it will be necessary to consider sites which are in the green belt (paragraph 7.3). Potential allocation sites have all been re-assessed in a bid to reduce the need to release green belt land; which the GMSF is seeking to keep to a minimum (paragraph 7.8).
- 2.44. Therefore, it is surprising that within Rochdale the dwelling yield of this suitable and sustainable site has been reduced but that new green belt sites have been proposed for release for housing. This would seem at odds with the premise in the Site Allocations Topic Paper that development opportunities outside the green belt will be maximised in order to minimise the amount of land to be released from the green belt.

Mix of housing

- 2.45. The draft policy requires higher value housing to be included in the housing mix. It is positive, in principle, that the site has been identified as being able to offer a different range of housing, including the potential for more executive style properties as oppose to affordable dwellings. However, there is objection to the specific reference in the draft policy for “higher value properties” being required.
- 2.46. There has to be flexibility on a site of this size for a range of dwellings to be delivered, which are reflective of the needs of the area and current market conditions at that time.
- 2.47. In accordance with GMCA Greater Manchester Strategy Housing Market Assessment (SHMA) (January 2019), Rochdale (along with Oldham and Tameside) has higher levels of terraced housing than the Greater Manchester average (paragraph 4.87). Rochdale has the second highest proportion of housing in band A (55%) (paragraph 4.106). Therefore, there is a need for a mix of housing to compliment the extensive amount of more affordable dwellings already present across large parts of the Borough.
- 2.48. What constitutes higher value housing is not clearly defined within the draft GMSF or supporting evidence base. Where it is referred to (paragraph 7.21 of the draft GMSF) it notes that higher value housing is “*relative to prevailing values in the local area*” but does not go as far as saying what this would be for each local area.
- 2.49. It is also important to note that executive style housing does not necessarily mean a low-density development. There is no requirement that to be an executive property a dwelling must be of a specific size or have a minimum number of dwellings. The key is just being able to offer a product that differentiates itself for existing stock in the surrounding area.
- 2.50. Therefore, for this site to offer a mix of dwellings, including an element of executive properties, is not justification for reducing the density or overall dwelling yield. There is no evidence that the two go hand in hand.
- 2.51. Through on-going pre-application meetings with the Council, the mix of dwellings and housing product to be offered will be discussed. From the work undertaken so far, this site does have the ability to deliver a mix of different dwellings, and the site promoters are keen to explore this. However, request that evidence is provided on why “higher value” housing is specifically being requested on this site.
- 2.52. If the density and dwelling yield was to be reduced, as is being suggested in the draft policy, this could affect the viability of the site and subsequently, its ability to include a range / mix of dwelling types.

Design codes

- 2.53. Whilst it is acknowledged that new development should achieve a good level of design quality and there is support in principle for development at the site to be of an excellent design, there is objection for the suggested mechanism for securing this to be through a set of design codes.
- 2.54. There is no definition as to what a design code constitutes or explanation as to the mechanisms for agreeing such codes and then subsequently enforcing them.
- 2.55. Taking the definition from Annex 2 of the NPPF, a design code is “*a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area*”.
- 2.56. Design codes are typically used on very large sites, where it is envisaged the development will be delivered in multiple phases by a number of different developers. In those instances,

having a set of design codes will ensure that the entire site is developed in a comprehensive manner and that all the different developers have signed up to a set of design parameters and principles that they can't deviate from.

- 2.57. This site has one owner and is being promoted by one housebuilder through a single application. There are not multiple phases or end developers that require detailed design codes to ensure there is a joined-up approach.
- 2.58. It is appreciated that the development of this site does need to follow a comprehensive approach that shows how the site in its entirety could come forward as one single and integrated scheme. However, the application process provides the appropriate route for this. Indeed, the application being prepared will undertake a Design and Access Statement that sets out the approach to the site in terms of design, layout, landscaping etc. In short, there is no need for an extra burden to be placed on this site in terms of working up a set of design codes; it is unnecessary.
- 2.59. Furthermore, there is a lack of clarity as to at what stage of the process the design codes should be set and how codes would be applied to developments coming forward in phases. There is a concern that adding in this extra layer to the overall process could potentially delay sites coming forward and impact upon an area's ability to significantly boost housing delivery in the short term.
- 2.60. In summary, there is no evidence underpinning the requirement to impose design codes, therefore, it is requested that this is removed from the draft Trows allocation.
- 2.61. Notwithstanding this, the site promoters are willing to positively engage with the Council to discuss the design and layout approach to this site. This will ensure a comprehensive scheme across the entire site, which responds well to its surroundings, is delivered, taking on board local design policies and an understanding of the local character of the area.

Site Access and linkages

- 2.62. The current scheme does propose to take access from Cowm Top Lane to the north and is exploring the possibility of utilising Trows Lane for emergency access only. However, as the design of schemes evolve, the policy should be worded with sufficient flexibility to enable alternative solutions to come forward where these can be shown to be acceptable in technical terms.
- 2.63. In terms of linkages and connectivity, whilst these can be provided to "fit into" the surrounding network, the end developers of the site will not have control over connections and routes all the way to the centre of Castleton and railway station outside of the site. The draft policy, therefore, needs amending to only require safe and attractive walking and cycling routes to connect into the local network surrounding the site.

Contributions to public transport accessibility improvements

- 2.64. In accordance with the provisions of the NPPF, any planning obligations must only be sought where they meet all of the following tests set out at paragraph 56:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 2.65. The requirement within the draft policy for a contribution towards public transport improvements is at odds with the reasoned justification supporting the draft policy.
- 2.66. The reasoned justification sets out that the site has *"excellent transport links"*, *"rail journeys into the regional centre from Castleton station take only fifteen minutes and this is complemented by a quality bus corridor along Manchester Road"*. Therefore, it is difficult to

see how a contribution towards improving an already excellent service is necessary to make the development acceptable, or fairly and reasonably related.

- 2.67. As currently drafted this part of the draft policy does not meet the tests set out in the NPPF. However, the site promoters will continue to liaise with the LPA on the matter of planning obligations as the planning application progresses.
- 2.68. Furthermore, paragraph 57 of the NPPF notes that where up to date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. However, there is no evidence presented to demonstrate that contributing to public transport accessibility improvements and provision of an on-site primary school (discussed in greater detail below) will be viable. There is no assessment accompanying the draft GMSF which shows an assessment of scheme viability has been carried out, therefore, it is unclear how conclusions can be reached that paying such contributions are firstly necessary and secondly still enable a viable scheme to come forward.
- 2.69. Therefore, any contributions required must be properly evidenced and meet all of the above tests, with policy allowing scheme viability to also be taken into account in determining the level of contributions requested from a particular site/scheme. The site promoters will work with the Council and consultees to deliver a viable residential scheme at the Trows Farm site, one that is consistent with GMSF aspirations for housing delivery but is also consistent with NPPF paragraph 56.

Topography and Green Infrastructure

- 2.70. Green infrastructure is described at paragraph 1.21 of the draft GMSF as “*parks, open spaces, trees, woodlands, rivers and canals*”, with the supporting text to draft policy GM-G2 identifying four different types of green infrastructure – river valleys and waterways; lowland wetlands and mossland; uplands and urban green spaces. The GMSF Natural Environment Topic Paper also notes that woodlands and trees and major parks and greenspaces constitute towards green infrastructure.
- 2.71. Based on the above, it is clear to see that green infrastructure can take many forms and constitute different elements of the natural environment.
- 2.72. There is support for the flexibility within the draft policy as to the typology and level of green infrastructure to be incorporated into any future scheme. By not dictating how green infrastructure should be delivered will mean that the most appropriate strategy for the site, scheme and surrounding environment will be delivered, once further technical work has been done.

Visual impact and noise and air quality mitigation

- 2.73. Development proposals at the site will be informed by a Landscape Assessment and illustrative Landscaping Strategy to ensure that there are no adverse impacts on the local and longer distance landscape, arising from delivering a housing scheme at the site.
- 2.74. Future applications at the site will be accompanied by both a Noise Assessment and Air Quality Assessment. These reports will determine what, if any, mitigation measures need to be incorporated into future schemes to avoid any adverse impacts on noise and air quality.
- 2.75. It is important that any future policy relating to implementation of mitigation measures is sufficiently flexible so that the most suitable measures can be put in place instead of specifying as part of the policy the mitigation to be provided.
- 2.76. Site topography will dictate layout and development parcels to a significant degree, plus the need to attenuate noise impacts via buffer areas will also inform where green infrastructure will need to be located on the site.

Education

- 2.77. There is strong objection to the suggested provision of a new primary school with associated outdoor play space being delivered on this site.
- 2.78. The draft GMSF suggests that there is a current shortage of primary school places across Castleton. However, there is no evidence available demonstrating this shortage and no evidence has been provided to demonstrate why the Trows site has been identified in the draft GMSF as the preferred location for a new school. The GMSF only states:
- “existing schools in this location do not have the capacity to expand further, therefore, the new demand created by this development must be met on site”* (paragraph 11.185).
- 2.79. However, there is no evidence base publicly available on the methodology for assessing and discounting sites and how and why this site has been selected above others in the vicinity. For the GMSF to be found sound in due course, it will need to be demonstrated that policies are justified. In accordance with the NPPF (paragraph 35), for policies to be justified they need to be based on an appropriate strategy, taking into account the reasonable alternatives and be based on proportionate evidence. At this stage no evidence is available, therefore, the element of the policy requiring provision of a new primary school is not justified.
- 2.80. Discussions have taken place with Rochdale Council for sight of this evidence base data underpinning its suggestion for an on-site primary school on the Trows site. However, at the time of writing and submitting these representations, this information remains outstanding.
- 2.81. Based on a scheme of say 500 dwellings, using the Council's formula (pupil yield of 0.25 per dwelling and then a cost of £12,320 per additional pupil) would only result in a primary education contribution of £1,540,000 to cover the extra 125 pupils expected to be generated by the scheme.
- 2.82. A 1 form entry primary school typically has over 200 pupils, therefore, the number of pupils to be generated by development of this site would be below that required for the 1 form entry primary school to be viable.
- 2.83. If the dwelling yield had to be reduced further to accommodate a new school, this would further reduce the number of pupils to be generated by the development and the level of mitigation (contributions) required to address the needs of this particular development.
- 2.84. A review of the Committee Report for a much larger scale mixed used scheme which includes up to 1,000 new dwellings at South Heywood in Rochdale (recently approved) revealed that the Council considered the cost of constructing a new primary school to be circa £3,600,000. This is significantly above the level of contributions that would be generated by delivering housing at the Trows site. Therefore, requiring a new primary school as part of developing this site would not meet the planning obligation tests set out in the NPPF on the following grounds:
- The provision of a new school is not necessary to make the development of this site for housing acceptable in planning terms. This can be achieved through the payment of a financial contribution which will cover the new places expected to be required as a result of new housing on this site; and
 - Given that the cost of providing a primary school is almost double the cost of the required contribution, imposing a requirement for a primary school to be delivered is not fairly and reasonably related in scale and kind to the development.
- 2.85. Furthermore, requiring a new primary school to be provided on this site is also at odds with draft policy GM-E 4 'Education, Skills and Knowledge'. This sets out the need to ensure sufficient provision of school places to meet the demands of new housing, either through

payment of a financial contribution or setting land aside for a new school “*proportionate to the additional demand that they would generate*” (emphasis added). This draft policy is supported. As set out above, the requirement to provide a new on-site primary school is not proportionate to the additional demand on primary school places which will result from delivery of housing at the site. The draft Trows allocation, therefore, does not accord with the GMSF’s approach to ensuring a sufficient supply of school places set out in draft policy GM-E 4.

- 2.86. The draft policy as currently worded also requires this site to assist in mitigating wider primary school place shortages. However, as set out above, any obligations sought from a development must be necessary and directly related to the development. The fact that there is a shortage of primary school places as a result of other new developments in the local area is not a justified reason for requiring this site to provide what is necessary in terms of primary school education.
- 2.87. However, should the Local Education Authority demonstrate a need for the development of this site to meet local education needs, any request for assistance must meet the NPPF tests at paragraph 56. The site promoters will then commence discussions about entering into a Section 106 Agreement, accordingly to off-set this impact; but this stage of process has not yet been reached.
- 2.88. Regardless of the suggestion for an on-site school not being based on any sound evidence or meeting the NPPF planning obligations tests, the Trows site is not physically a suitable site for the provision of a new primary school for a number of reasons.

Topography

- 2.89. Firstly, the site has very challenging topography, and whilst this does not preclude its developability for housing, it does make it difficult to provide a flat area of a sufficient size to provide a large school building and associated playing fields, parking and infrastructure.
- 2.90. A cut and fill exercise is required to make the site suitable for residential development, however, this is based on number of smaller buildings with the ability for the layout, foundations etc to work with the site levels and integrate better as one cohesive scheme.
- 2.91. The extent of engineering works required to make the site suitable for a school is likely to be extremely expensive and affect the amount of land that would need to be set aside for the school. This will have an adverse impact overall on the viability of bringing the site forward for housing in the short term.
- 2.92. The creation of a large flat area on the site, could create an ‘alien landscape feature’ on a site which has a rolling topography. It would not be integrated well with the rest of the site and its surroundings.

Location / Access

- 2.93. The site is not an ideal location for a new school. Whilst it is immediately adjacent to existing housing and has good pedestrian and cycle linkages to surrounding areas, there will only be one vehicular access point into the development. This would mean that the only way of accessing the school via private car would be down a long cul de sac.
- 2.94. In terms of residential areas beyond the site accessing the school, due to the presence of the two major roads bordering the site, vehicular journeys would need to take the long route and go around Queensway. There is no other way of accessing the site (by car) from the east, south or west.
- 2.95. Given the single point of access into the site and the fact that all cars would need to travel along Queensway to get to the school, in highways terms it is not an ideal location.

Existing Schools

- 2.96. There are already three primary schools within the Castleton area – Castleton Primary School, St Edwards CE Primary School and St Gabriels RC Primary School.
- 2.97. Based on the information available, it has not been demonstrated that the existing schools cannot be extended further, reconfigured or even the sites redeveloped to accommodate an entirely new larger school. All three schools have open areas adjacent to them which could be used to either provide replacement sports facilities, if existing sports pitches had to be partially lost to accommodate an extension or be used for new buildings. This should surely be the first option to be explored. Evidence that this has been done has been requested but has not been made available.

Viability

- 2.98. Alongside the lack of evidence on why this site has been selected is a lack of evidence on viability. It has not been demonstrated through the draft GMSF or associated evidence that delivering a primary school on this site is viable.
- 2.99. Requiring land to be taken up by a new school reduces the land available for the delivery of housing. The cut and fill works proposed are already fairly extensive to just accommodate smaller residential buildings, extending this to provide a large flat area of sufficient size for a new school will result in substantial additional costs.
- 2.100. The draft policy also refers to a contribution towards secondary education. Discussions with the Council, including the education department, confirmed that there was no requirement for this site to provide a contribution towards secondary education, given the capacity of pupil spaces in secondary schools.

Summary

- 2.101. Taking the above into account, to ensure that the site is able to come forward in the short term and start delivering housing that will assist in meeting the needs of the local area, the draft policy should be amended as follows:

Development at this site will be required to:

1. Deliver around ~~600~~ 360 new homes incorporating a good mix of house types which could include, including if appropriate, higher value an element of executive housing;
2. Achieve excellent design and sustainability through masterplanning ~~and the use of design codes for the whole site~~ to ensure comprehensive development;
3. Provide access to the site primarily via Cowm Top Lane to the north;
4. ~~Provide~~ Facilitate safe and attractive walking and cycling routes to the local centre of Castleton and the railway station;
- ~~5. Contribute to public transport accessibility improvements;~~
- ~~6-5.~~ Use the topography and contours within the site to deliver a well-designed scheme which incorporates good quality green infrastructure;
- ~~7-6.~~ Ensure that development provides a positive visual impact given its prominent position adjacent to the M62 and A627(M) motorways;
- ~~7.~~ Incorporate appropriate noise and air quality mitigation, if required, along the M62 and A627(M) motorway corridors; and
8. Where necessary, provide proportionate contribution towards primary school education.
- ~~9. Provide a new primary school and associated outdoor playing space on site and contribute to additional secondary places to meet demand arising from the new development as well as existing demand within the local area.~~

The site is available and deliverable for residential development and provides an excellent opportunity to widen housing choice in a sustainable location. The wider area around Castleton has a number of existing housing opportunities and this site complements these and offers the potential to regenerate Castleton in the longer term. Castleton offers a

number of local services and has excellent transport links.

Rail journeys into the regional centre from Castleton station take only fifteen minutes and this is complemented by a quality bus corridor along Manchester Road. High-quality walking and cycling connections to Castleton station and Manchester Road should therefore be facilitated ~~provided~~ as part of the development. The site also has good access to the motorway network.

The topography of the site does not affect its developability and provides an opportunity to deliver a visually interesting scheme using the topography within the site. There is new employment development to the north of the site at Crown Business Park but the site is large enough to achieve adequate separation between the two uses.

There is a local issue in terms of primary school places. Where development of this site would generate extra pupils above the number of existing primary school places available, a proportionate contribution towards primary school education will be required. ~~and this can only be resolved through the provision of a new school. Existing schools in this location do not have the capacity to expand further, therefore, the new demand created by this development must be met on site.~~

3. Relevant Draft Technical Policies (Questions 30 and 61)

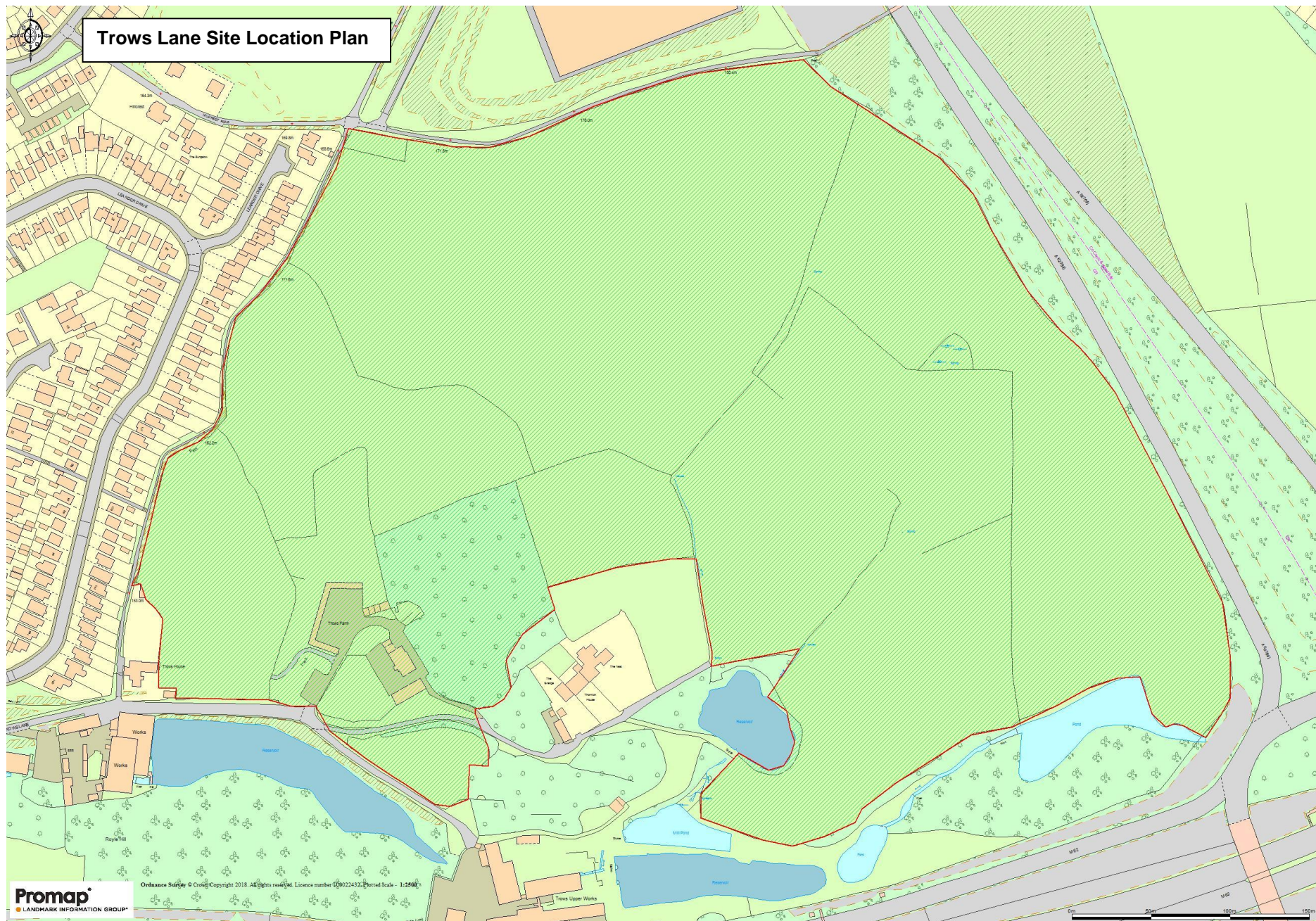
Question 30 – Do you agree with the proposed policy on Heat and Energy Networks?

- 3.1. There is objection to draft policy GM-S 3 which identifies “Heat and Energy Network Opportunity Areas” and sets out a number of criterion that development sites within such areas will need to meet. The map on page 89 of the draft GMSF shows the potential locations for these Heat and Energy Network Opportunity Areas, which includes Trows Farm.
- 3.2. The only justification provided for identifying these locations is due to the dense urban nature of these area and the scale of development proposed as part of the draft GMSF allocations. However, there are several substantial draft allocations which do not appear to be covered or designated as opportunity areas, therefore, questions are raised as to the methodology for selecting certain areas over others. This doesn’t appear to be set out in the draft GMSF or any of its supporting documents.
- 3.3. Also, what is not clear from the information available is the location and extent of any existing heat/energy networks. Where such schemes are encouraged (ie in the opportunity areas) is there existing infrastructure that new developments can tap into or will each development be required to fund all the necessary infrastructure.
- 3.4. These are important questions that don’t appear to have been answered and depending on individual site circumstances could have impacts upon the viability of delivering schemes.
- 3.5. There is also the question as to how well district heating systems work within a low-density context (ie not apartments) as it does require scale to become cost effective against the conventional alternatives, such as employing the fabric first approach. A further risk is that district heating systems won’t necessarily reduce resident’s energy costs and instead tie them into a particular source of heat and energy, prejudicing ability to change providers etc.
- 3.6. Whilst the need to respond to climate change and reduce carbon emissions is appreciated and acknowledged, there should be flexibility as to how individual schemes are able to contribute to this. For example, there should be the ability for schemes to adopt a “fabric first” approach to reducing emissions. This approach reduces the maintenance and management burden of systems, such as district heating systems, that can be imposed on residents and management companies (ultimately funded by residents).

Question 61 Do you agree with the proposed policy on Education, Skills and Knowledge?

- 3.7. Draft policy GM-E 4 provides flexibility for new housing schemes to either offer a financial contribution towards the provision of new school places or set aside land for a new school as a means of ensuring there are sufficient school places to respond to the additional demand that they would generate. This flexibility is supported as it is not always possible, as set out above, for sites to be able to accommodate a new school on site.

Appendix 1



Appendix 2



Baldwin Design			
Residential Development			
Project Title: Trows Farm Castleton			
Drawing: Draft Sketch Layout			
Drawing No: 19110101.01			
Client: JLB			
Date: 20/10/18			
Page Size: A1			
House Type			
No.	Soft	Total Soft	
Kerley	34	514	20876
Rowdon	80	796	55480
Folkstone	66	830	54780
Maldstone	63	830	52290
Mowley	30	854	25630
Esdsale	14	1058	14812
Derwent	46	920	42330
Heveringham	33	1146	38478
Windermere	80	1073	85840
Ripon	62	1121	69502
Thornton	17	1300	22300
Alderney	37	1225	45325
Site Total			
562		528423	
Nett Site Area (x4 Parcels)			
36.1 AC			
Nett Footage			
14637.756 SQFT/AC			

 PARK FRINGE

 MAIN LOOP



Trows Farm, Castleton

