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SUBMITTED BY ONLINE PORTAL: <https://www.gmconsult.org/communications-and-engagement-team/gmsf/consultation/>

18th March 2019

Dear Sir or Madam,

**Re: Representations to the Greater Manchester Spatial Framework – Revised Draft 2019 (GMSF):
GM Allocation 21 Thornham Old Road, Oldham**

We are writing on behalf of Barratt Homes and FW Investments to provide site-specific representations to the consultation on the draft Greater Manchester Spatial Framework (GMSF).

Barratt Homes have a proven track record of delivering high quality new residential developments in Greater Manchester and are part of Barratt Developments, a leading major national housebuilder that has been operating for over 60 years.

Barratt Developments has achieved the 5 Star Home Builder status with the Home Builders Federation (HBF) which means that more than 90% of their customers who responded to the HBF's national customer satisfaction survey said that they would recommend them to a friend. Barratt Developments are the only major national housebuilder to have achieved 5 Star status for nine years running.

These representations are in response to Question 100 of the consultation and directly relate to Policy GM Allocation 21 Thornham Old Road. They are intended to be read alongside separate submissions on behalf of Barratt Developments by Emery Planning, which cover the consultation questions in relation to the draft strategic policies.

These representations are divided into two sections and cover the following:

1. The inclusion of land immediately to the north of Thornham Old Road and south of Plumpton Farm (Plan 1) within Policy GM Allocation 21 - Thornham Old Road.
2. The inclusion of additional land to the north of Plumpton Farm, north of Thornham Old Road and west of A671 Oldham Road (Plan 2) within Policy GM Allocation 21 - Thornham Old Road.



1. The inclusion of land immediately to the north of Thornham Old Road and south of Plumpton Farm (Plan 1) within Policy GM Allocation 21 - Thornham Old Road

FW Investments are the owners of land to the north of Thornham Old Road (see Plan 1) and Barratt Homes have been selected as the potential delivery provider.

This site is included within Policy GM Allocation 21 – Thornham Old Road and we therefore, support the proposed removal of this land from the Green Belt and allocation for residential development.

The site is considered to be deliverable, in accordance with the definition set out in the National Planning Policy Framework (NPPF), and Barratt Homes are keen to progress with development of the site as soon as possible, subject to the granting of planning permission by Oldham Council.

We have the following comments on the specific requirements set out in the policy.

a. Comprehensive Masterplan

Criteria 1 requires development within the allocation to be in accordance with a comprehensive masterplan agreed by the local planning authority (LPA).

As the proposed allocation falls under separate land ownerships, Barratt Homes would seek to work with the LPA and other landowners to deliver a comprehensive masterplan for the whole allocation. However, the masterplan should be prepared by the developer(s)/landowners in liaison with the LPA, rather than being LPA-led and should not become overly onerous or detailed in that it delays delivery of much-needed new homes in the area.

If the adjacent landowners fail to positively respond to the LPA during the masterplanning process, Barratt Homes would work with the LPA to prepare an appropriate layout for the land under its control.

We recommend that Policy GM Allocation 21, or its explanatory text, makes it clear that the masterplan should be submitted with, or in advance of, the first planning application for residential development within the allocation, and would not need to be agreed by the local planning authority prior to submission of the first planning application.

b. Delivery of New Homes

Criteria 2 of the Policy allocates the site for delivery of around 600 homes.

It should be noted that this is currently an estimate of the site's capacity for new development and should not be used as a ceiling to restrict the number of units being proposed at the planning application stage. If the land can be developed more efficiently, in accordance with national planning policy, then further units should be permitted.

c. Green Infrastructure

Criteria 6 and 14 refer to the delivery of 'multi-functional green infrastructure'.

There is no definition included within the Policy of what is meant by this term. If it is the intention of the Policy that this green infrastructure is to include particular uses or roles, then these should be set out in the Policy and justified through robust evidence.

If there are no prescriptive uses then an appropriate network of public open space, landscaping and sustainable drainage measures shall be agreed with the LPA through the masterplanning and planning application processes.



d. Biodiversity Net Gain

Criteria 7 states that development should retain and enhance areas of biodiversity within the site to deliver a clear and measurable net gain in biodiversity.

Biodiversity net gain is dealt with in GMSF Strategic Policy GM-G 10 - A Net Enhancement of Biodiversity and Geodiversity. Representations to this policy have been submitted separately by Emery Planning Partnership on behalf of Barratt Developments.

As the requirements set out in Criteria 7 are already covered in Strategic Policy GM-G 10 and no additional site-specific requirements are included, this Criteria is not necessary and should be deleted from the Policy.

e. Open Space, Sport and Recreation Facilities

Criteria 9 refers to the need to provide new and/or improvement of existing open space, sport and recreation facilities to meet additional demand from the allocation.

Any site-specific requirements for open-space, sport and recreation facilities should be set out in the Policy and justified through robust evidence.

f. School Places

Criteria 10 refers to the need to provide additional school places to meet increased demand.

It should be made clear in the Policy that the provision of additional school places would only be necessary if there is insufficient capacity within existing primary and secondary schools. We recommend adding '*if necessary*,' to the start of Criteria 10.

g. Health and Community Facilities

Criteria 11 refers to the need to provide additional health and community facilities to meet increased demand.

It should be made clear that the provision of additional health and community facilities would only be necessary if there is insufficient capacity within the existing local facilities. We recommend adding '*if necessary*,' to the start of Criteria 11.

h. Heritage Assets

Criteria 12 requires the preservation or enhancement of heritage assets within, and in the vicinity of, the site and their setting.

It is not currently clear that this refers to built heritage assets only and not archaeology which is included under Criteria 13. We therefore, request that Criteria 12 is reworded to replace '*heritage assets*' with '*built heritage assets*'.



2. The inclusion of land to the North of Plumpton Farm to the north of Thornham Old Road and west of A671 Oldham Road (Plan 2) within Policy GM Allocation 21 Thornham Old Road

The land shown on Plan 2 is located immediately north of GM Allocation 21. It is within the administrative boundary of Rochdale, on the border with Oldham.

The land is currently designated as Green Belt. It surrounds, but does not include, the buildings of Plumpton Farm and extends northwards, parallel with the A671 Rochdale Road, towards the M62 Motorway.

The land is undulating grazing land and slopes upwards towards the west. The eastern boundary is defined by the rear gardens of existing residential dwellings, which form ribbon development along the A671 Oldham Road / Rochdale Road.

The land is developable and we request that consideration is given to the inclusion of this land within Policy GM Allocation 21. Our justification for inclusion of this land is provided in the following sections.

a. Housing Need

The representations by Emery Planning, on behalf of Barratt Developments, explain that the overall housing requirement of 201,000 dwellings over the plan period (2018-37) is considered too low and that a higher housing need figure should be used, resulting in a need for additional housing land.

Allocation of the land in Plan 2 as part of GM Allocation 21 would help to address these concerns that the draft GMSF is failing to release sufficient Green Belt land to provide for objectively assessed housing needs.

The land is approximately 21.5 hectares (ha) in area and could deliver circa 680 additional dwellings.

b. Availability for Development

The land is under the same ownership as that shown on Plan 1 and is available for development now.

c. A Suitable Location for Development

Local Facilities

The land is located immediately to the west of Summit and north of Royton, Oldham. The centre of Royton is approximately 2km to the south where there is a range of retail, community, health and civic facilities within walking and cycling distance of the site.

Summit is located to the north of Royton centre and includes a convenience store, post boxes, several public houses, a florist, hairdressers and beauticians.

The nearest primary school is Thornham Saint James' Church of England Primary School (approximately 750m from the centre of the site) and the nearest secondary school is St. Cuthbert's RC High School (approximately 550m from the centre of the site).

The land is therefore, sustainably located close to a range of existing local facilities. The inclusion of this additional land within GM Allocation 21 would also provide social and economic benefits to these local businesses and services through increased spending during both construction and occupation and could result in new businesses and services being established in the local area to the benefit of existing residents.



Access and Connectivity

Vehicular access would be from Thornham Old Road to the south via GM Allocation 21. Discussions are also ongoing with regard to establishing a deliverable second point of access, likely from the A671 Oldham Road / Rochdale Road to the east.

The A671 Oldham Road / Rochdale Road provides a link to Rochdale Town Centre to the north and Oldham Town Centre to the south. Transport for Greater Manchester have also identified the A671 corridor as a location with the potential to support modal shift, improving air quality and regenerating local centres and identified it within the first tranche of pipeline work for the Streets for All Programme to improve orbital connectivity.

Access to the strategic highway network would be via Junctions 20 or 21 of the M62 Motorway, which can be accessed via A671 Oldham Road and the A664 to the north.

The nearest railway station is Rochdale Railway Station, approximately 3km to the north, which provides services into Manchester, as well as destinations in Lancashire and Yorkshire.

There are existing bus stops on the A671 Oldham Road / Rochdale Road within walking distance which provide connectivity to Oldham and Rochdale Town Centres, as well as Royton.

The Rochdale Way bridleway and recreational route runs east-west along Thornham Old Road and connects to other footpaths in the wider area. The footpaths also provide connectivity to Tandle Hill Country Park to the south as well as providing a crossing over the A627(M) Motorway to the west.

Technical Constraints

There are no statutory or non-statutory environmental designations either within or immediately adjacent to the land shown on Plan 2.

The land is located in Flood Zone 1 on the Environment Agency's online flood map which equates to a low risk of flooding from rivers and the sea.

The Agricultural Land Classification (ALC), as shown on DEFRA's MAGIC Map website¹, is Grade 4, which is not considered 'best and most versatile'.

There are no Public Rights of Way crossing the land.

All necessary utilities are located in Thornham Old Road and these would be subject to reinforcement as required at the planning application stage. There are no utilities within or near to the land for which the Health and Safety Executive (HSE) would have an interest.

Development of this land as part of a larger GM Allocation 21 would have limited potential for visual impacts on Tandle Hill Country Park. It is screened by trees and hedgerow and is lower lying than the land to the west. Suitable green infrastructure could be incorporated on higher land at the west to reduce the potential for adverse visual effects, or effects on local landscape character.

d. Green Belt Harm

The land is currently designated as Green Belt and is proposed to remain as Green Belt within the draft GMSF. With the removal of GM Allocation 21 from the Green Belt, a new Green Belt boundary is proposed to the north along the administrative boundary of Oldham and Rochdale.

¹ <https://magic.defra.gov.uk/magicmap.aspx> (accessed 15/03/19)



Paragraph 133 of the NPPF 2019 states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 134 sets out the five purposes of Green Belt:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

In this instance, Criteria (a), (b) (c) and (d) of Paragraph 134 are relevant.

We consider that the loss of 21.5ha of Green Belt, through inclusion of the land within GM Allocation 21, would not harm the purposes of the Greater Manchester Green Belt in this location.

The Greater Manchester Combined Authorities (GMCA) Green Belt Assessment (2016) concludes that the Green Belt between Royton and Rochdale performs strongly in terms of purposes (a), (b) and (c) and moderately in terms of (d) above. Given the strength and extent of the Green Belt in this location, the land shown on Plan 2 could be removed whilst still maintaining the purposes of the Green Belt.

Development of this land would not result in the unrestricted sprawl of large built-up areas or result in neighbouring towns merging into one another. A gap of undeveloped land would still remain between Summit and the outskirts of Rochdale to the north and north west. In addition, a barrier to the merging of these urban areas is already provided by the M62 and A627(M) Motorways.

Development of this land would result in limited encroachment into the countryside. The land runs parallel with existing residential development on the A671 and the western boundary of the land does not extend as far to the west as GM Allocation 21. Development in this location would be viewed as an extension of Summit.

Given the contours of the land, which slope upwards towards the west, and the contours of GM Allocation 21, which reach a peak and then slope away to the west and to the south, development of the land will have limited potential for visual impacts on the countryside, including Tandle Hill Country Park. It is screened by trees and hedgerow and at some distance from the Country Park.

The position of the Green Belt in this location means that it is protecting the setting and character of Rochdale. As a gap of undeveloped land would still remain between the site and Rochdale and therefore, the historic setting of Rochdale would still be retained.

Paragraphs 136 to 142 of the NPPF provide guidance on the establishment and review of Green Belt boundaries. Paragraph 138 is very clear that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. The removal of this land from the Green Belt, through inclusion within GM Allocation 21, would not result in harm to the purposes of the Green Belt and would allow for a new Green Belt boundary to be drawn that reflects local topography, rather than being arbitrarily based on the administrative boundary of Oldham and Rochdale. This approach should ensure that the new Green Belt boundary can endure beyond the plan period.

e. Summary

In summary, the land shown in Plan 2 is developable, is in a sustainable location with limited technical constraints and should therefore, be considered for inclusion within GM Allocation 21 to help meet Greater Manchester's housing need.



Inclusion within GM Allocation 21, as part of the GMSF process, provides an ideal opportunity to allocate this land for residential development without being constrained by local authority boundaries. Through inclusion in the GMSF, the principles of good planning can be applied to ensure that a new defensible Green Belt boundary is created that is based on local characteristics, rather than administrative boundaries, and can therefore, endure beyond the plan period.

Thank you in advance for giving due regard to these representations. Please do not hesitate to contact me if you have any queries or require any further information.

Yours faithfully,

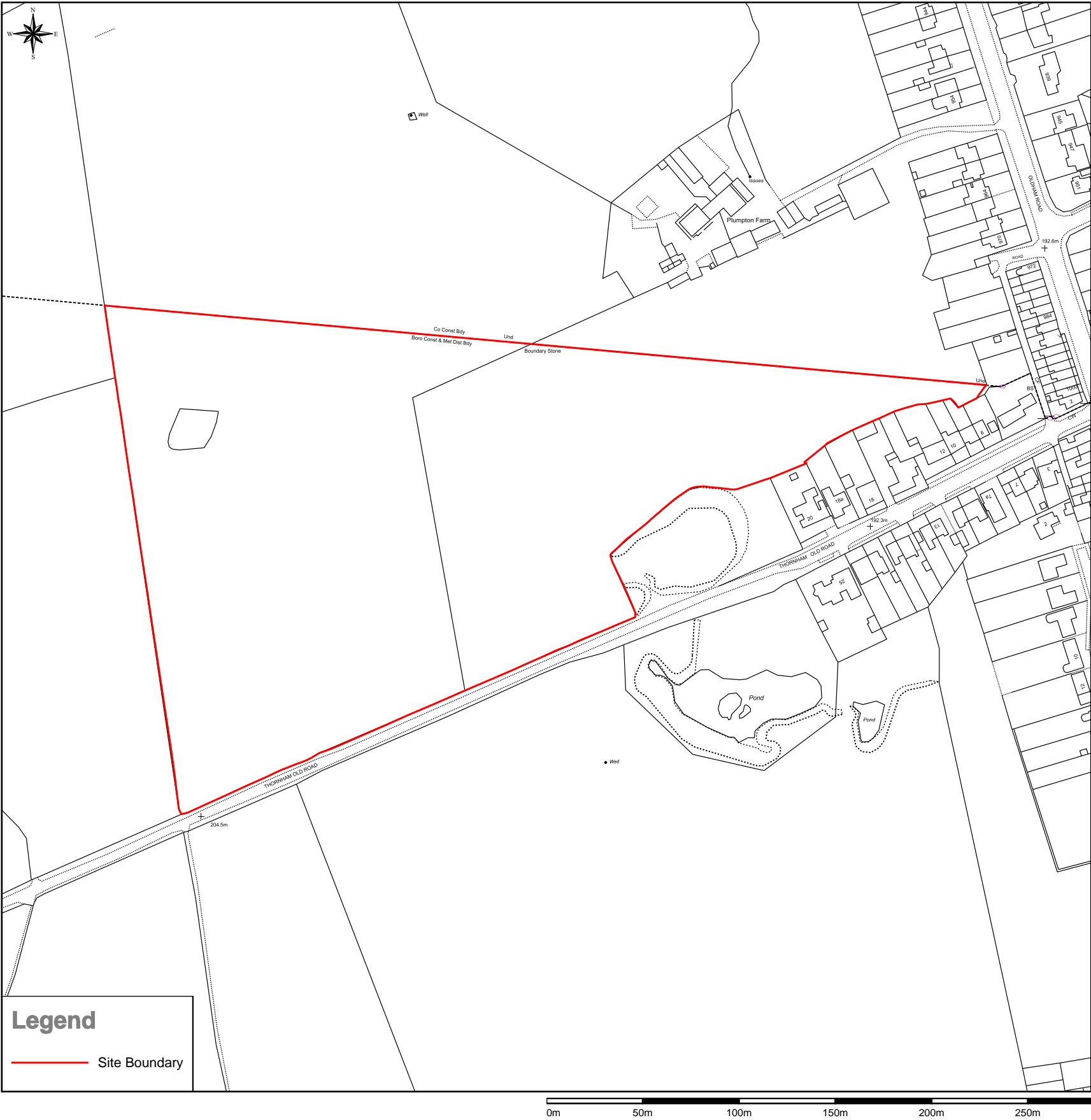
Chris Garratt
Associate Director

For and on behalf of White Peak Planning Ltd.

Cc: Simon Artiss – Barratt Homes

*Encs: Plan 1 - Plumpton Farm, Oldham
Plan 2 - Plumpton Farm, Rochdale*

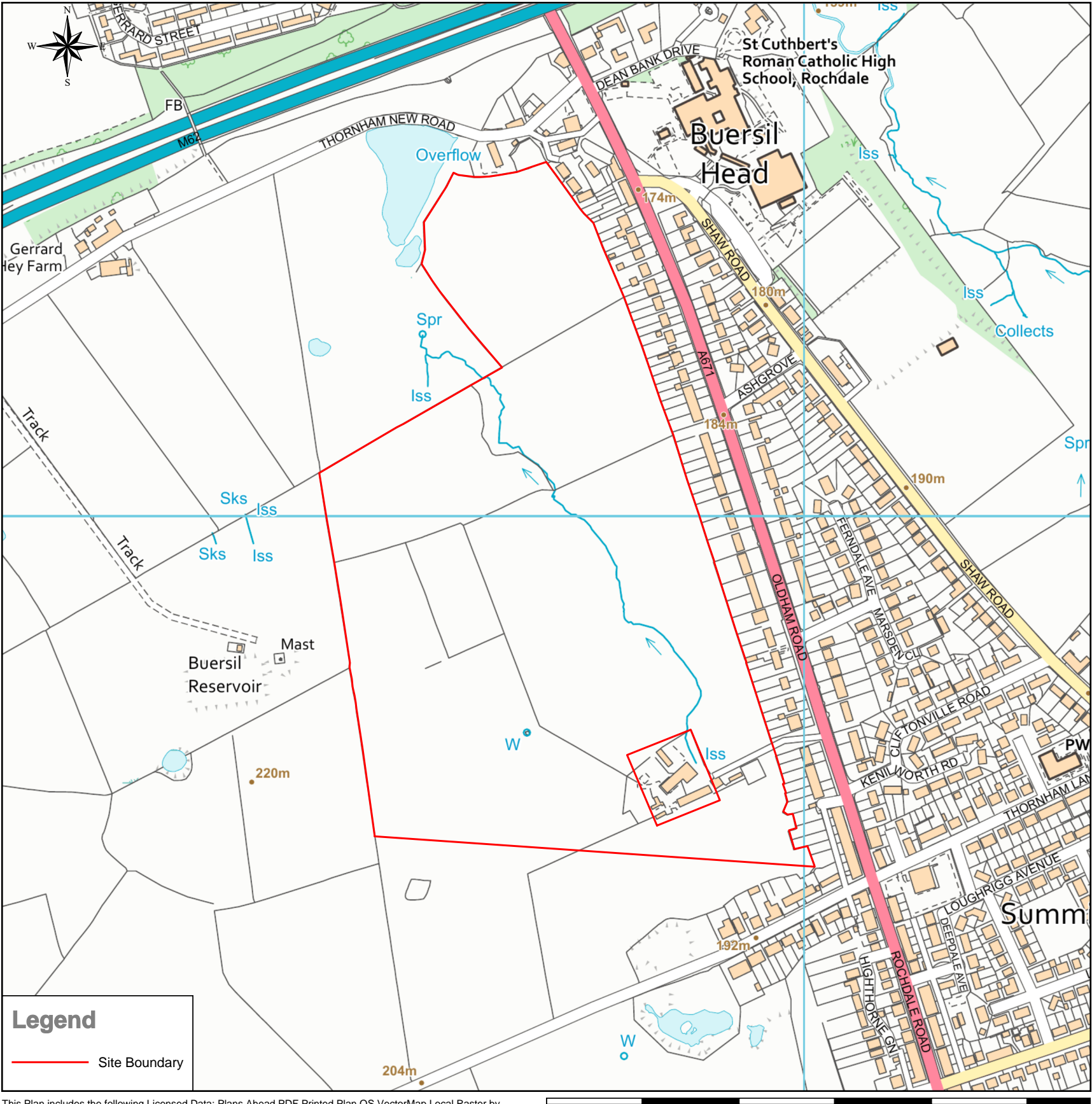
Plan 1 - Plumpton Farm, Oldham



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Plan 2 - Plumpton Farm, Rochdale



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