

Land at Kingsway South,
Rochdale

Greater Manchester Spatial Framework

Representations to revised draft plan

indigo.

Land at Kingsway South, Rochdale

**Greater Manchester Spatial
Framework**

Representations to revised draft plan

March 2019

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Appendices

Appendix 1

Site Location Plan

1. Executive summary

- 1.1. We write on behalf of the Trustees of J.P. Milne (dec'd) Will Trust (herein referred to as "the Milne Trust") to make representations to the Greater Manchester Spatial Framework (GMSF) Revised Draft 2019.
- 1.2. The Milne Trust is actively promoting land at Kingsway South, Rochdale, for an employment-led mixed-use development including residential and other complementary uses. The land extends to approximately 40ha, comprising a circa 10ha site at Broad Shaw Lane and a circa 30ha site north east of Rochdale Road (herein referred to simply as "the sites". Collectively, the sites form part of draft Policy GM Allocation 3 (Kingsway South). A plan showing the extent of the sites (the eastern-most clusters of land shaded red) is contained at **Appendix 1**.
- 1.3. There is strong support for the proposed allocation of the sites as part of draft Policy GM Allocation 3.
- 1.4. These representations re-iterate and reinforce the sites' deliverability and demonstrate that there are no site constraints preventing employment-led mixed-use development including residential and other complementary uses being delivered on the sites in the short-term.
- 1.5. In accordance with Annex 2 of the NPPF, the sites are available, suitable and achievable for development in the short-term:
 - **Available:** The sites are actively being promoted by the Milne Trust. There are no known ownership constraints preventing the sites coming forward in the short-term either in isolation from or as a first phase of the wider Kingsway South allocation.
 - **Suitable:** The sites have excellent sustainability credentials and are strategically located for employment and residential development with other complimentary uses. The mixed-use development of the sites is technically deliverable and there are no known constraints which cannot be mitigated through scheme design.
 - **Achievable:** Whilst the sites form part of the proposed Kingsway South allocation, they can come forward in isolation from or as a first phase of the wider allocation to deliver much-needed employment floorspace in the short-term.
- 1.6. Delivering a substantial mixed-use development at the sites will result in significant economic, social and environmental benefits to the local area and community helping to boost the south east of Rochdale and north of Oldham. The proposed allocation represents a crucial opportunity to enhance an established and strategically located employment site in a suitable and sustainable location. Development of the sites will play a crucial role in delivering much-needed employment floorspace and jobs in Rochdale and Oldham.
- 1.7. Residential development is also proposed as part of the allocation. Given the strong sustainability credentials, the sites could accommodate a mix of uses including residential.
- 1.8. Development of the sites would also reach across to neighbouring Oldham and wider Greater Manchester (GM) boroughs.
- 1.9. Therefore, it is vital that these sites, and indeed the wider Kingsway South allocation, continue to be included as a mixed-use allocation as the GMSF progresses given that it forms an essential part of Rochdale's and Oldham's future employment and housing strategy.

2. Response to questions in draft GMSF Chapter 1

Question 1: What type of respondent are you?

- 2.1. These representations have been prepared by Indigo Planning Ltd on behalf of the Trustees of J.P. Milne (dec'd) Will Trust.

Question 2: Contact Details

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

Daniel Jackson

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St James' Tower

7 Charlotte Street

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M1 4DZ

Email: daniel.jackson@indigoplanning.com

Tel: 0161 836 6910

Question 3: Are you over the age of 13?

- 2.3. 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

- 2.4. The representations are submitted on behalf of The Trustees of J.P. Milne (dec'd) Will Trust (herein referred to as "the Milne Trust"). 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?

- 2.5. Yes.

Question 6: Do you agree that we need a plan for jobs and homes in Greater Manchester?

- 2.6. Agree.

Question 7: Do you agree that to plan for jobs and homes, we need to make the most efficient use of our land?

- 2.7. **Agree.** However, this does not necessarily mean focusing solely on urban brownfield sites which can accommodate high density development. As set out in these representations, a mix of different sites across the region are required to ensure that the full objectively assessed housing needs of all parts of Greater Manchester are met.

Question 8: Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

AND

Question 9: Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?

- 2.8. Ensuring there are sufficient green spaces for the residents of Greater Manchester to enjoy is important. However, this shouldn't automatically be interpreted that all greenfield sites, open countryside and Green Belt should be protected. Each site should be assessed on its own merits. As set out in the subsequent sections of these representations, there is often a strong case for a such sites to the released to help meet future development needs.

Question 10: Is the approach that we have outlined in the plan reasonable?

- 2.9. The following representations set out the comments on the approach to the various elements of the plan.

3. Response to questions in draft GMSF Chapters 3, 4 and 5

Question 12: Do you agree with the Strategic Objectives?

AND

Question 13: Do you agree with the Spatial Strategy?

- 3.1. We **mostly agree** with the Strategic Objectives and Spatial Strategy.
- 3.2. Objective 2 of the Strategic Objectives seeks to prioritise the re-use of brownfield land in aiming to create neighbourhoods of choice. Similarly, Objective 3 seeks to prioritise the use re-use of brownfield land in ensuring a thriving and productive economy in all parts of Greater Manchester. The Spatial Strategy echoes this stance, noting that an essential aspect of the efficient and effective use of land will be to priorities the re-use of brownfield land when meeting development needs.
- 3.3. Whilst the re-use of brownfield sites should be one of the focuses for delivering new development, it should not and cannot be the only focus. We would not support the introduction of a sequential assessment which requires all brownfield sites to be come forward ahead of any greenfield sites. This would not be reflective of national policy, which only seeks to encourage, promote and support the re-use of brownfield land.
- 3.4. The challenges often associated with developing brownfield sites are discussed in subsequent sections, but it is important to note that greenfield sites can also make an important and positive contribution towards to the supply of sites for future development as identified in the proposed allocation of land at Kingsway South, Rochdale (as part of draft Policy GM Allocation 3 – Kingsway South).
- 3.5. Despite the prioritisation of brownfield land over sustainable and deliverable greenfield land, there is support in the vision at paragraph 4.14 of the draft GMSF which acknowledges that in order to meet the scale and distribution of development required to meet the needs of Greater Manchester, it will require some development of land removed from the Green Belt including land within the draft Policy GM Allocation 3 – Kingsway South.
- 3.6. There is also support for Objective 4 which, inter alia, seeks to maximise the potential from key employment locations such as proposed allocations identified as part of the M62 North East Corridor growth area (draft Policy GM-Strat 7).
- 3.7. However, in order to be found sound, the Strategic Objectives and Spatial Strategy should be amended to only encourage and support the re-use of brownfield land, as oppose to making it a priority. Focusing too heavily on brownfield sites is likely to result in delays to the delivery of housing, running the risk of not meeting the objectively assessed needs of the region. As drafted, this would be an unsound approach to follow as it is not positively prepared or consistent with national policy.
- 3.8. We therefore suggest the following textual changes to the Strategic Objectives and Spatial Strategy (deletions with ~~strike through~~, additions in **bold**):

Objective 2 and 3

“Prioritise deliverable and developable sites”

~~*“Prioritise Encourage and support the use of brownfield land”*~~

- 3.9. For the reasons set out above, brownfield land cannot be a priority if meeting the objectively assessed housing and employment land needs of GM are to be met in the short-term. Priority should be given to deliverable and developable sites. A new bullet point should be added to Objective 2 and 3.
- 3.10. In addition to the new bullet point, by amending the wording of “*prioritise the use of brownfield land*” to “*encourage and support the use of brownfield land*” it still promotes the re-use of brownfield sites without prejudicing highly sustainable and strategically located greenfield sites – which are often more sustainable and deliverable than brownfield sites - coming forward to deliver much-needed residential and employment development in the short-term.

Spatial Strategy

- 3.11. To achieve a successful rebalancing of economic growth in between the north and south GM and ultimately boost northern competitiveness, the Spatial Strategy should acknowledge that there may be a need to develop sustainable greenfield sites within the strategic growth areas which may require the release of land from the Green Belt where the economic potential of such land significantly outweighs its contribution to the Green Belt. A new paragraph within the Spatial Strategy section should be added to that affect.

Question 19: Do you agree with the proposed policy on Northern Areas?

- 3.12. We **agree** with the proposed policy on Northern Areas.
- 3.13. Draft Policy GM-Strat 6 (Northern Areas) states that GMSF will seek to deliver a “*significant increase in the competitiveness of the northern areas...a strong focus on urban regeneration and enhancing the role of the town centres, complemented by the selective release of Green Belt in key locations that can help boost economic opportunities and diversify housing provision.*”
- 3.14. In the case of draft Policy GM Allocation 3 – Kingsway South, the selective release of Green Belt in this location is strongly supported.
- 3.15. Given the excellent sustainability credentials of the site (as referred to in response to question 79) and its identification as a key location for boosting economic opportunities and diversifying Rochdale’s and Oldham’s housing stock, its release from the Green Belt is critical in facilitating the employment-led mixed-use development of the site.
- 3.16. As demonstrated in the response to question 79, although the land promoted by the Milne Trust lies within a larger parcel which scores strongly against the purposes of the Green Belt, ultimately its strategic and sustainable location are critical in delivering Rochdale’s and Oldham’s employment and housing land requirements over the plan period and therefore its removal from the Green Belt is fully justified and supported.

Question 20: Do you agree with the proposed policy on M62 North East Corridor?

- 3.17. We strongly **agree** with draft Policy GM-Strat 7 and the draft Policy GM Allocation 3 (Kingsway South) as one of three major sites to deliver a significant amount of employment floorspace and housing.
- 3.18. Kingsway Business Park is a long-established and strategically located employment site on the south eastern fringe of Rochdale and immediately adjacent to the M62. It is reaching capacity and its expansion is therefore critical over the GMSF plan period.
- 3.19. The identification of the proposed Kingsway South allocation is therefore strongly supported and land promoted by the Milne Trust within can be brought forward in the short-term for

employment-led mixed-use development.

Question 28: Do you agree with the proposed policy on Sustainable Development?

- 3.20. We **mostly disagree** with the draft Policy GM-S 1.
- 3.21. The concept of planning contributing to the delivery of sustainable development is borne out of the NPPF (paragraph 7). Therefore, including a policy relating to the delivery of sustainable development is in keeping with the provisions of national policy.
- 3.22. However, as set out above, what is not supported is the suggestion that preference will be given to using brownfield sites to meet development needs. This goes above and beyond the national requirement of seeking to encourage the use of brownfield sites.
- 3.23. Each site considered for future development should be assessed on its own merits and not automatically discounted due to the fact it is not brownfield. These sites can take longer to come forward, may require higher levels of investment or funding to kick start their development and typically have more development constraints and challenges which need to be overcome. Therefore, a reliance on brownfield sites is a risky strategy given the uncertainties surrounding the deliverability and developability of brownfield sites (see response to questions 12 and 13 above).
- 3.24. Reference should be removed to prioritising brownfield sites and amended to focus on prioritising deliverable and developable sites that are able to come forward and make a real contribution to meeting the needs of the region.

4. Response to questions in draft GSMF Chapter 6

Question 36: Do you agree with the proposed policy on Supporting Long-Term Economic Growth?

AND

Question 37: Do you agree with the proposed policy on Employment Sites and Premises?

- 4.1. We strongly **agree** with the proposed policy for supporting long-term economic growth in GM (draft Policy GM-P 1).
- 4.2. We also strongly **agree** with the proposed policy for employment sites and premises (draft Policy GM-P 2).
- 4.3. There is strong support for the identification of the M62 North East Corridor growth area and the proposed allocations which make up the strategic area, including draft Policy GM Allocation 3 (Kingsway South).
- 4.4. The key locations identified in draft Policy GM-P 1, which includes the M62 North East Corridor, will bring forward a strong portfolio of prime investment opportunities for new floorspace as required by draft Policy GM-P 2, with many being particularly suitable for prime growth sectors and specialisms, including draft Policy GM Allocation 3 (Kingsway South). This includes the selective removal of land from the Green Belt to provide the quality of employment land supply necessary to deliver the required scale of long-term economic growth, as set out in draft Policy GM-P 3 'Office Development' and draft Policy GM-P 4 'Industry and Warehousing Development'.
- 4.5. Furthermore, draft Policy GM-P 2 states that existing employment areas that are important to maintaining a strong and diverse supply of sites and premises throughout Greater Manchester will be protected from redevelopment to other uses and nurtured to ensure they remain competitive. The Milne Trust support the protection of existing employment areas, such as the neighbouring Kingsway Business Park and Stakehill Industrial Estate.

Question 39: Do you agree with the proposed policy on Industry and Warehousing Development?

- 4.6. We strongly **agree** with draft Policy GM-P 4 (Industry and Warehousing Development) which states that at least 4,220,000sqm of new industrial and warehousing floorspace will be provided in GM over the period 2018-2037.
- 4.7. To achieve this, it is acknowledged that a high level of choice and flexibility will need to be provided in the supply of sites for new industrial and warehousing floorspace, maximising the key locations identified in draft Policy GM-P 1 and significantly increasing the supply of high-quality sites across the northern parts of Greater Manchester to help increase northern competitiveness. Land promoted by the Milne Trust at Kingsway South can deliver much-needed high-quality and flexible new industrial and warehousing floorspace in a highly strategic and sustainable location and support other key employment sites in the area, such as Stakehill Industrial Estate.
- 4.8. Draft Policy GM-P 4 also states that individual sites providing more than 100,000 sqm of industrial and warehousing floorspace should, where there is likely to be demand and it is appropriate to the location, incorporate:

A. Opportunities for manufacturing businesses, particularly advanced manufacturing;

B. Units capable of accommodating small and medium sized enterprises; and

C. Overnight parking for heavy goods vehicles.

- 4.9. Land promoted by the Milne Trust at Kingsway South has the development capacity to accommodate the above provisions, if required, to help GM compete internationally for investment, providing an attractive portfolio of employment floorspace to respond to the varied needs of different businesses.

Question 40: Do you have any further comments on the policies and overall approach proposed in A Prosperous Greater Manchester?

- 4.10. An independent assessment of the demand for employment land and premises in Rochdale was undertaken by Colliers. The assessment concludes that there is a demand through the market for new employment land and premises in the Rochdale, Middleton and Heywood area. The evidence provided by both Colliers and the RDA demonstrate that there is not enough supply within the North West to meet the market demand. The supply for large scale operators is currently not of sufficient quality or spec to meet the operator's requirements.
- 4.11. The provision of a significant number of dwellings is required to complement the need for a substantial increase in employment floorspace whilst also supporting Rochdale's and Oldham's housing land supply.
- 4.12. As set out in response to question 79, the development of a range of high-quality and flexible employment land and housing and complementary mixed-uses land promoted by the Milne Trust at Kingsway South, which forms part of draft Policy GM Allocation 3, would provide a significant contribution to addressing these demands in the short-term.

5. Response to questions in draft GMSF Chapter 7

Question 41: Do you agree with the proposed policy on the Scale of New Housing Development?

- 5.1. We **mostly disagree** with draft Policy GM-H 1.
- 5.2. Draft Policy GM-H 1 (Scale of New Housing Development) states that a minimum of 201,000 net additional dwellings will be delivered in Greater Manchester over the period 2018-37, or an annual average of around 10,580.
- 5.3. Firstly, there is support for the fact that draft Policy GM-H-1 only seeks to set a minimum target and does not consider a housing requirement to be a ceiling which once reached would mean a resistance to any further housing sites coming forward. The use of minimum housing figures is consistent with the provisions of national guidance and is the approach which should be carried forward as the GMSF progresses.
- 5.4. Notwithstanding this, we strongly disagree with the proposed scale of new housing in draft Policy GM-H-1, which sets out that a minimum of 201,000 net additional dwellings will be delivered in Greater Manchester over the period 2018-2037; which equates to an annual average of 10,580 dwellings.
- 5.5. This scale of housing is too low and not ambitious enough for the GMSF to realise its growth objectives.

Standard Methodology

- 5.6. The housing target set out in draft Policy GM-H-1 is based on the standard methodology calculation. The NPPG states:

“The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances of other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (eg Housing Deals);*
- *Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *An authority agreed to take an unmet need from neighbouring authorities, as set out in a statement of common ground” (paragraph ID:2a-010-20190220).*

- 5.7. The draft GMSF sets out that “economic growth is central to the overall strategy for Greater Manchester” (paragraph 6.1) and that “Greater Manchester will need to continue to invest in the sites and critical infrastructure that will make it an even more attractive place for

businesses to invest, bringing high-value, well paid jobs, to the city region" (paragraph 6.12). For the region to attract and retain people to carry out the increasing number of jobs, then sufficient housing, of an acceptable standard, will need to be available. In short, a high economic growth strategy needs to be accompanied by a high housing growth strategy; the two must go hand in hand.

- 5.8. The Northern Powerhouse seeks to deliver more and inclusive growth across the UK, counterbalancing the dominance of London and the South East. As set out at paragraph 2.24 of the draft GMSF, *"the strength and strategic location of Greater Manchester puts it in an ideal place to act as the primary driver for the Northern Powerhouse...Hence it will be important to deliver relatively high level levels of growth within Greater Manchester for the wider benefit of the North"*.
- 5.9. In addition, the presence of HS2 within the region will help deliver a more integrated national economic, opening up greater business opportunities to support UK growth.
- 5.10. Maintaining the housing target generated by applying the standard methodology does not align with the ambitious economic objectives being promoted in the draft GMSF. Indeed, this represents an opportunity to push for a higher housing growth figure.
- 5.11. As per the provisions of the NPPG, although the standard method is the starting point for identifying the minimum housing need, the housing requirement figure finally adopted can be higher in certain circumstances. The ambitious economic growth strategy being promoted through the draft GMSF; the Northern Powerhouse and the planned infrastructure improvements including the delivery of HS2 are all valid reasons to justify an uplift when determinising the housing requirement for the region.
- 5.12. Furthermore, the standard method only *"identifies a minimum annual housing need figure. It does not produce a housing requirement figure"* (NPPG, paragraph ID: 2a-002-20190220). There is no justification in the accompanying SHMA as to how the minimum annual housing need figure generated by applying the standard methodology is the most appropriate and justified strategy for Greater Manchester. No alternatives are considered in the SHMA or scenarios tested to determine whether a higher housing requirement figure is appropriate working from a base of the standard method housing need figure.
- 5.13. This is a short-coming of the SHMA. Therefore, any policy based upon the findings of the SHMA will be unsound as it is not based on a justified evidence base that has properly taken into account reasonable alternatives.
- 5.14. On this basis, in order for Greater Manchester to have the best possible chances of realising its ambition to be a *"top global city"* then a more ambitious housing growth figure, above the suggested 201,000 dwellings, should be progressed. Failure to do this risks the ambitions of the GMSF not materialising, and Greater Manchester missing an opportunity through the GMSF to deliver a high level of co-ordinated growth and development, allowing it to compete on both national and international levels.

Affordable Housing

- 5.15. In addition to the above, in accordance with the GMCA SHMA 2019, the net affordable housing requirement for Greater Manchester is 4,678 dwellings. Against the draft annual requirement of 10,580 dpa, this represents circa 44% of the total housing required.
- 5.16. Draft Policy GM-H 2 'Affordability of New Housing' sets out the GMSF will aim to deliver at least 50,00 new affordable homes over the plan period. However, this is below the identified need set out in the SHMA, which based on a 19 year plan period equates to circa 88,880 affordable dwellings. Therefore, the level of housing planned for is too low to ensure that affordable housing needs will be met.
- 5.17. This is further evidence that the draft housing target currently set out is insufficient to meet

the housing demands of the region. Failure to take account and plan for these needs will mean that plan has not been positively prepared or justified and is, therefore, unsound.

Phasing

- 5.18. There is concern with the suggest in paragraphs 7.11 – 7.13 of the draft GMSF, that there are likely to be delays, and some instances quite significant delays, as to when proposed future housing sites will start to be able to deliver housing. Lack of Government funding and need for masterplanning and infrastructure investment are noted as some of the reasons for this. Thereby raising the question over the developability of a number of the sites making up the assumed supply.
- 5.19. The suggestion of 'back ending' housing needs is not consistent with the NPPF, which requires authorities to "significantly boost the supply of homes" (paragraph 59) and will not assist in reversing the significant shortfall in housing deliver that has occurred over the past number of years.

Summary on the scale of housing

- 5.1. There is objection to the proposal to deliver 201,000 dwellings over the plan period as this is too low to meet the existing and future needs of the region and assist in meeting the already significant shortfall in delivery.
- 5.2. Progressing with the draft housing requirement set out in draft Policy GM-H 1 is unsound. It has been demonstrated above that the current strategy has not been positively prepared as it does not seek to meet the area's objectively assessed needs. Furthermore, it would be contrary to the presumption in favour of sustainable development (paragraph 11 of the NPPF) which requires plans to "*seek opportunities to meet the development needs of their area*" and "*as a minimum provide for objectively assessed needs*".
- 5.3. The figure of 201,000 doesn't meet these tests and needs increasing in the future iterations of the plan.

Question 42 – Do you agree with the proposed policy on the affordability of new housing?

- 5.4. We **mostly disagree** with draft Policy GM-H 2.
- 5.5. As set out above, for draft Policy GM-H 2 to assist in significantly increasing the supply of new affordable housing and make the substantial improvements in the ability for people to access housing at a price they can afford, then the overall housing requirement figure needs to be increased. The level of new affordable homes proposed under draft Policy GM-H 2 cannot be achieved if the overall housing figure remains at only 201,000 dwellings.
- 5.6. There is support for the suggestion that any future affordable housing can be either on-site or off-site. However, this should be extended to also enable, where appropriate and justified, a financial contribution to be made towards affordable housing in lieu of on-site provision. This provides flexibility for sites to deliver the mix of housing required to meet local needs, reflect market conditions is reflective of the provisions of paragraph 62 of the NPPF.
- 5.7. Viability is also an important considered and reference should be included within draft Policy GM-H 2 that when determining the contribution, a site/scheme can make towards affordable housing provision, that viability and site-specific circumstances will be taken into account.

Question 43: Do you agree with the proposed policy on the Type, Size and Design of New Housing?

- 5.8. We **disagree** with draft Policy GM-H 3.

- 5.9. As set out in greater detail below, concerns are raised with regards to the over-reliance on apartments within the anticipated housing supply for the region (see response to question 45). There is no evidence indicating that such a high level of apartments is required and indeed, the SHMA indicates a large preference for houses as oppose to apartments.
- 5.10. In relation to the suggestion in draft Policy GM-H 3 that all new dwellings must comply with nationally described space standards and be built to the 'accessible and adaptable' standard, there is no flexibility within the policy for viability to be taken into account when imposing these standards on new developments. Furthermore, there is no evidence to indicate that imposing such requirements would not impact the viability of a scheme.
- 5.11. The policy as drafted is unsound as it is not justified given the lack of evidence underpinning the suggested requirements to demonstrate that it is the most appropriate strategy.

Question 44: Do you agree with the proposed policy on the Density of New Housing?

- 5.12. There are concerns raised in relation to question 43 and 45 on the over-reliance on apartments is also relevant to this question. The suggested densities in draft Policy GM-H 4 are skewed towards the delivery of apartments in city and town centres, which runs the risk of resulting in an under-provision of family housing. Draft Policy GM-H 4 doesn't plan for a delivering and supporting a mix of different housing types, sizes and densities of development across the region, which is what is required.
- 5.13. Sites delivering a mix of high-quality housing, including larger, higher value properties (as required in draft Policy GM Allocation 3), should be able to come forward at densities appropriate to that site and its surroundings. It shouldn't automatically be assumed that such schemes have to be low density. Therefore, greater flexibility should be incorporated into future density policies.

6. Response to questions in draft GMSF Chapter 8

Question 56: Do you agree with the proposed policy on the Greater Manchester Green Belt?

- 6.1. We **mostly agree** with draft Policy GM-G 11.
- 6.2. Draft Policy GM-G 11 (The Greater Manchester Green Belt) states that Green Belt policies will be strictly applied to the development areas removed from the Green Belt by this plan except in the case of planning applications complying with the relevant allocations policies (see 11 'Allocations').
- 6.3. The Milne Trust supports the acknowledgment within the draft GMSF that Green Belt land will need to be released to meet the future development needs of the region. Also, we support that the preparation of a plan (ie GMSF) is an appropriate vehicle to review and amend the Green Belt boundaries.

Green Belt release

- 6.4. The Milne Trust supports the removal of land it is promoting within the proposed Kingsway South allocation from the Green Belt. Its removal, coupled with its strong deliverability credentials set out below, will facilitate the employment-led mixed-use development of the sites, including residential, in the short-term.
- 6.5. Whilst supportive of its removal, having reviewed the Green Belt Assessment (2016) for the parcel within which the land promoted by the Milne Trust lies, which ultimately informs the identification of sites in the GMSF, we consider the sites have a more limited contribution to the five purposes of the Green Belt than is purported in the Green Belt Assessment (2016).
- 6.6. Land at Kingsway South falls within Green Belt parcel ref: OH03 – a huge parcel spanning an area of circa 300ha. Against the five purposes of the Green Belt contained in the NPPF, the Green Belt Assessment (2016) scores the parcel as follows:

Parcel Ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating
OH03	Strong	Strong	Strong	Strong	Strong

- 6.7. Given the parcel area extends to circa 300ha, we do not consider it a fair assessment of the parcel as a whole. It is simply too large to accurately assess the various smaller land parcels which make up the larger parcel ref: OH03 and as a result the Green Belt parcel's performance against the five purposes is skewed. As such, Indigo has carried out its own assessment of the land promoted by the Milne Trust which we consider to score as follows, with reasons give against each:

Purpose 1a – Moderate – The land immediately south of the M62 and east of Burnedge and Rochdale Road. The sites have existing urbanising features within, including detached dwellings and farmsteads. We consider the sense of openness to be compromised as a result.

- **Purpose 1b – Moderate** – The land provides some contribution towards checking the unrestricted sprawl of Shaw and Newhey, however the sprawl is prevented by the M62 to the north and Rochdale Road to the west which represent strong physical barriers.

- **Purpose 2 – Weak** – Development of the land promoted by the Milne Trust would still maintain an extensive area of land between the settlements of Shaw and Rochdale which, ultimately, could never merge by virtue of the strong physical barrier provided by the M62 to the north.
- **Purpose 3 – Moderate** – The land is immediately south of the M62 and east of Burnedge and Rochdale Road. The land has existing urbanising features within, including detached dwellings and farmsteads. We consider these features to limit the connection of the parcel with the characteristics of the countryside. Encroachment of urbanised built development has occurred, and the visual influence of adjoining physical barriers ensures that the parcel displays limited characteristics of the countryside.
- **Purpose 4 – No Contribution** – given the location of the land within the parcel, which lies towards the north of the allocation and slopes down from south-north, the land promoted by the Milne Trust has no intervisibility with the historic settlements of Chadderton, Littleborough, Milnrow, Rochdale (Town Centre), Royton, Shaw (Park Cottages) or Shaw (Saint James). The land therefore has no contribution towards the setting and ‘special character’ of historic towns.

6.8. In summary, we consider that the land promoted by the Milne Trust, when assessed in isolation of the wider Green Belt parcel ref: OH03, scores weak to moderately in its contribution to the five purposes of the Green Belt. The assessment of a Green Belt parcel of circa 300ha is not accurate and the parcel should be considered in smaller segments. Re-assessing land parcels in the Green Belt on this basis would further support the removal of the land at Kingsway South from the Green Belt to facilitate employment-led mixed-use development.

Site selection criteria for Green Belt sites

- 6.9. Furthermore, Indigo Planning has also carried out its own assessment of the proposed Kingsway South allocation against the site selection criteria for Green Belt sites contained within the GMSF Site Selection Topic Paper (2019). There are seven criteria in total.
- 6.10. The Topic Paper concludes that the proposed Kingsway South allocation meets the requirements of criterion 3 and 7, however Indigo considers the criteria and methodology to require amendments based on the following comments:

Criteria	Criteria Description	Response
1	Land which has been previously developed and/or land which is well served by public transport	Whilst the site is not previously developed, the site is well served by public transport as set out in our response to question 79.
2	Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors – this includes areas such as Port Salford and Manchester Airport/HS2 Airport Station	It is not possible for all sites across Greater Manchester to be located in close proximity of the two key assets identified. Imposing this criterion would mean that areas outside of Manchester and Salford would automatically fail against this criteria. Whilst it is important to ensure that key assets within Greater Manchester are allowed to continue to thrive and be a focus for future investment and development, dismissing sites simply because they aren't close to these major assets would not go anyway to reducing / reversing the disparities between the north and

		south of GM.
3	Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth – key areas of focus are the M62 North-East Corridor, Wigan-Bolton Growth Corridor and New Carrington	<p>It is acknowledged that the land promoted by the Milne Trust lies within the proposed Policy GM Allocation 3 area, which in turn forms one of three allocations within the M62 North East Corridor growth area. The land is strategically located to maximise economic opportunities and respond to the need to rebalance north-south competitiveness – a key part of the GMSF.</p> <p>However, as stated in response to criterion 1, only scoring sites positively which are close to the three strategic areas of focus would mean any sites outside of these areas would fail. This criterion should be updated to reflect this.</p>
4	Land within 800 metres of a main town centre boundary or 800m from the other town centres' centroids	Applying only an 800m radius from town centres excludes large areas of the majority of boroughs from meeting this criterion. There are strategically located and highly sustainable land holdings and sites more than 800m away from a main town centre boundary, such as land at Kingsway South.
5	Land which would have a direct significant impact on delivering urban regeneration	The employment-led mixed-use development of land at Kingsway South will have a direct significant impact on delivering urban regeneration in Rochdale and Oldham, generating jobs, homes and inward investment.
6	Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits.	As set out in our response to question 79, the development of the site would deliver significant economic, social and environmental benefits to the wider community. Development of the site would also enable the Council the opportunity to seek financial contributions from the developer to fund and support sustainable travel options.
7	Land that would deliver significant local benefits by addressing a major local problem/issue.	Agreed. Development of the site would provide a significant contribution to Rochdale's undersupply of available employment land and would reinforce its housing land supply. As set out in our response to question 79, the development of the site would deliver significant economic, social and environmental benefits to the wider community quickly.

7. Response to question 79 in draft GMSF Chapter 11

Question 79 – Do you agree with the proposed Policy GM Allocation 3: Kingsway South?

- 7.1. We **mostly agree** with the proposed allocation, within which the Milne Trust is promoting a substantial amount of developable land in the short-term.
- 7.2. The land forms part of the wider Kingsway South allocation which proposes a minimum of:
- 310,000 sqm of high quality, adaptable, employment space; and
 - 700 dwellings.
- 7.3. An independent assessment of the demand for employment land and premises in Rochdale was undertaken by Colliers. The assessment concludes that there is a demand through the market for new employment land and premises in the Rochdale, Middleton and Heywood area. The evidence provided by both Colliers and the RDA demonstrate that there is not enough supply within the North West to meet the market demand. The supply for large scale operators is currently not of sufficient quality or spec to meet the operator's requirements.
- 7.4. The provision of a significant number of dwellings is required to complement the need for a substantial increase in employment floorspace whilst also supporting Rochdale's housing land supply.
- 7.5. The development of a range of high-quality and flexible employment land and housing and complementary mixed-uses on land at Kingsway South would provide a significant contribution to addressing these demands in the short-term. The sites' deliverability in the short-term is set out below.

Deliverability – Suitability and Sustainable Development

- 7.6. In accordance with Annex 2 of the 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. Whilst it is acknowledged that the NPPF definition of deliverable applies housing, it is considered appropriate to assess the deliverability of the proposed employment-led mixed-use development, including residential, against this definition.
- 7.7. The following sub-sections clearly demonstrate that land promoted by the Milne Trust at Kingsway South is deliverable and meets the criteria of the definition contained within Annex 2.

The sites are available now

- 7.8. A plan showing the extent of the sites being promoted by the Milne Trust (the eastern-most clusters of land shaded red) is contained at **Appendix 1**. The land is owned partly by the Milne Trust and partly by other landowners who are ready to take the site forward now.
- 7.9. As such, there are no land ownership constraints that would hinder the delivery of development at the sites in the short term. The sites can come forward in isolation in the short-term or as a first phase of the wider allocation.

The sites are suitable

- 7.10. The sites, as with all the draft Policy GM Allocation 3 area, are strategically well located to deliver employment-led mixed-use development. The land promoted by the Milne Trust extends to approximately 40ha, comprising a circa 10ha site at Broad Shaw Lane and a circa 30ha site north east of Rochdale Road.
- 7.11. Noting that access to and from the allocation will be required via a new spur from junction 21 of the M62, secondary access points are crucial in bringing forward available and deliverable parcels within the allocation in the short-term. The significant infrastructure requirements to facilitate a single in and out access from junction 21 of the M62 and the associated internal allocation highways works will constrain development in the short-term.
- 7.12. The sites are strategically located near to Junction 21 of the M62. The M62 provides direct links to the M60 Manchester Ring Road, key towns and cities in the north of England, including eastbound to Huddersfield, Leeds and Hull, and westbound to Warrington, St. Helens and Liverpool (via a short section on the M60 Manchester Ring Road) and links to the national motorway network.
- 7.13. On a more local level, the sites are sustainably located, with the services and facilities in Rochdale within easy reach of the site by walking and cycling and also a range of public transport options, including Bus Route 435 on Broad Lane/Rochdale Road, immediately west of the sites, which provides direct connections between the site and Rochdale Town Centre (north-bound) and Shaw (south-bound).
- 7.14. Whilst already highly sustainable sites for employment-led mixed-use development including residential, the requirements of proposed Policy GM Allocation 3 also make provision for a number of improvements to access and public transport, including:
- Support and contribute to the delivery of enhanced public transport provision to and from the site to promote more sustainable travel, including the delivery of a dedicated shuttle bus service from Kingsway Metrolink stop providing a link through Kingsway to the site and enhanced bus corridors to the west along Rochdale Road (Criterion 6); and
 - Create safe and attractive pedestrian and cycle friendly routes linking the site to nearby Metrolink stops, integrating these throughout the site as part of a broader network, complementing and enhancing existing recreation routes as part of the multi-functional green infrastructure network, so as to encourage sustainable short journeys to work and promote healthier lifestyles (Criterion 7).
- 7.15. The proposed improvements to access and public transport are supported.
- 7.16. The suitability of the sites to accommodate future employment land, housing and a mix of other complimentary uses has already been established through the identification of the site as a mixed-use housing allocation, which is supported. Therefore, it is vital that the sites, and indeed the Kingsway South allocation, continue to be included as a future mixed-use allocation as the GMSF progresses given that it forms an essential part of Rochdale and Oldham's future employment and housing strategy. Indeed, the GMSF extols the site's potential, confirming that:
- “Kingsway South provides a significant opportunity for both Oldham and Rochdale to contribute to the future economic growth of Greater Manchester, capitalising on the established location of Kingsway and proximity to the motorway and Metrolink network. It has the potential to provide a significant contribution to the sub-regional requirement for employment floorspace within key growth sectors and attract additional investment and economic activity to the area.”*
- 7.17. Initial technical and feasibility work has been carried out for the sites. The initial findings are

set out below which demonstrate that there are no known technical constraints to delivering employment-led mixed-use development at the sites in the short term. This represents a strong commitment to developing the sites.

Landscape and visual impact

- 7.18. The sites are not located within a 'sensitive area'. They are also well screened and enclosed by existing development and infrastructure, therefore, their development will not have any negative impacts on the surrounding landscape.
- 7.19. Initial design work shows that due to the topography of the sites, and with the addition of soft landscaping to provide perimeter screening, development will not have a significant visual impact when the sites are seen in long views. Further, the sites are surrounded by urbanising influences, such as the M62 and Rochdale Road, and therefore will not have a significant impact on the landscape.

Ecology

- 7.20. The sites do not lie within any statutory or non-statutory designed sites of nature conservation.
- 7.21. The limited tree cover at the sites provide little opportunity for roosting bats and it is considered that any development on the sites is unlikely to result in a negative effect on the local bat population.
- 7.22. The recommendations contained within forthcoming survey work will be incorporated to ensure suitable mitigation measures are included in the scheme design, so the development of the sites will not have a detrimental impact upon biodiversity. However, there are no ecological features present on the sites that would prevent development from coming forward.

Flooding and drainage

- 7.23. According to the Government Flood Maps for Planning, the sites are located wholly within Flood Zone 1 where there is a low risk of flooding. Residential development at the sites is therefore appropriate and the sequential test contained within the NPPF is not required.

Traffic and transport

- 7.24. The sites are in a highly sustainable and strategic location for employment-led mixed-use development including residential and other complementary uses. From an employment land perspective, the sites are immediately adjacent to the well-established Kingsway Business Park, are excellently located geographically in the heart of the Northern Powerhouse region, are adjacent to the M62 which provides direct connections to the national motorway network and have a substantial workforce catchment from adjacent towns including Rochdale, Royton, Shaw and Oldham.
- 7.25. As part of any scheme forthcoming, residents would be encouraged to utilise the various public transport options available within the vicinity of the sites, reducing reliance on the use of private vehicles.

Air quality and noise

- 7.26. Whilst the M62 is immediately north of the sites and is a designated Air Quality Management Area (AQMA), in-design mitigation measures will be incorporated within the development to ensure that sensitive receptors are not potentially exposed to poor air quality or adverse noise impact.

Furthermore, careful consideration of the site accesses and internal circulation

arrangements will ensure that exhaust emissions and noise associated with the additional traffic generated by the development is not expected to result in significant adverse impacts to existing and future residents or the AQMA.

Heritage

- 7.27. A heritage asset identified as the 'Brick Built House at Chadwick Fold' (Grade II Listed) is located in the northernmost of the sites at Kingsway South being promoted by the Milne Trust.
- 7.28. There are a further three heritage assets immediately along the north boundary of the southernmost cluster of land. These are: Knott Booth Farmhouse and Adjoining Farm; Burnedge Farmhouse; and Moorgate East Farmhouse (all Grade II Listed).
- 7.29. Development of the sites will pay due regard to the significance of these heritage assets and their settings, incorporating necessary mitigation measures in the scheme design to ensure there would be no adverse impact on the heritage value of these assets.

Topography

- 7.30. The topography of the land promoted by the Milne Trust is well suited to development and does not present any constraints. The land gently slopes up from the M62 motorway towards the southernmost of the sites, beyond which it begins to steeply rise towards the south of the allocation. Development is clearly more suitable on land towards the north and west of the allocation, where much of the land is in the control of the Milne Trust.
- 7.31. Topography will be considered as part of the overall landscaping framework strategy and as suggested by draft Policy GM Allocation 3, will include the retention of existing features where practicable, so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside.

The site is achievable

- 7.1. The Milne Trust are ready to take the sites forward in the short term and have appointed a project team to that affect.
- 7.2. There are also no other known technical constraints that would prevent development being delivered at the sites and technical reports are in the process of being finalised to evidence this.

Scheme benefits

- 7.3. There are a number of benefits that will be realised for the local area and borough as a result of developing the sites for a mix of uses. The significant economic, social and environmental benefits of such a scheme coming forward include:
 - Extension to an established and strategically located employment site, Kingsway Business Park, through provision of wide-range of high-quality, flexible employment floorspace within an attractive environment with a focus on advanced manufacturing, logistics and other growth industries;
 - Provision of a substantial mix and quantum of jobs, feeding off the nearby populations of Rochdale, Newhey, Royton, Shaw and Oldham;
 - Complimentary mixed-uses to support the employment and housing development;
 - 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 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 available for new and existing residents; and
- Opening up the site with new links through the site to surrounding paths and bridleways.

7.4. The sites are therefore deliverable and represents sustainable development, offering a plethora of economic, social and environmental benefits.

Draft allocation policy requirements

7.5. The Milne Trust strongly support the identification of the Kingsway South site as a future mixed-use allocation. There are however some minor changes required to the policy requirements in order to make draft Policy GM Allocation 3 more robust.

Criterion 1

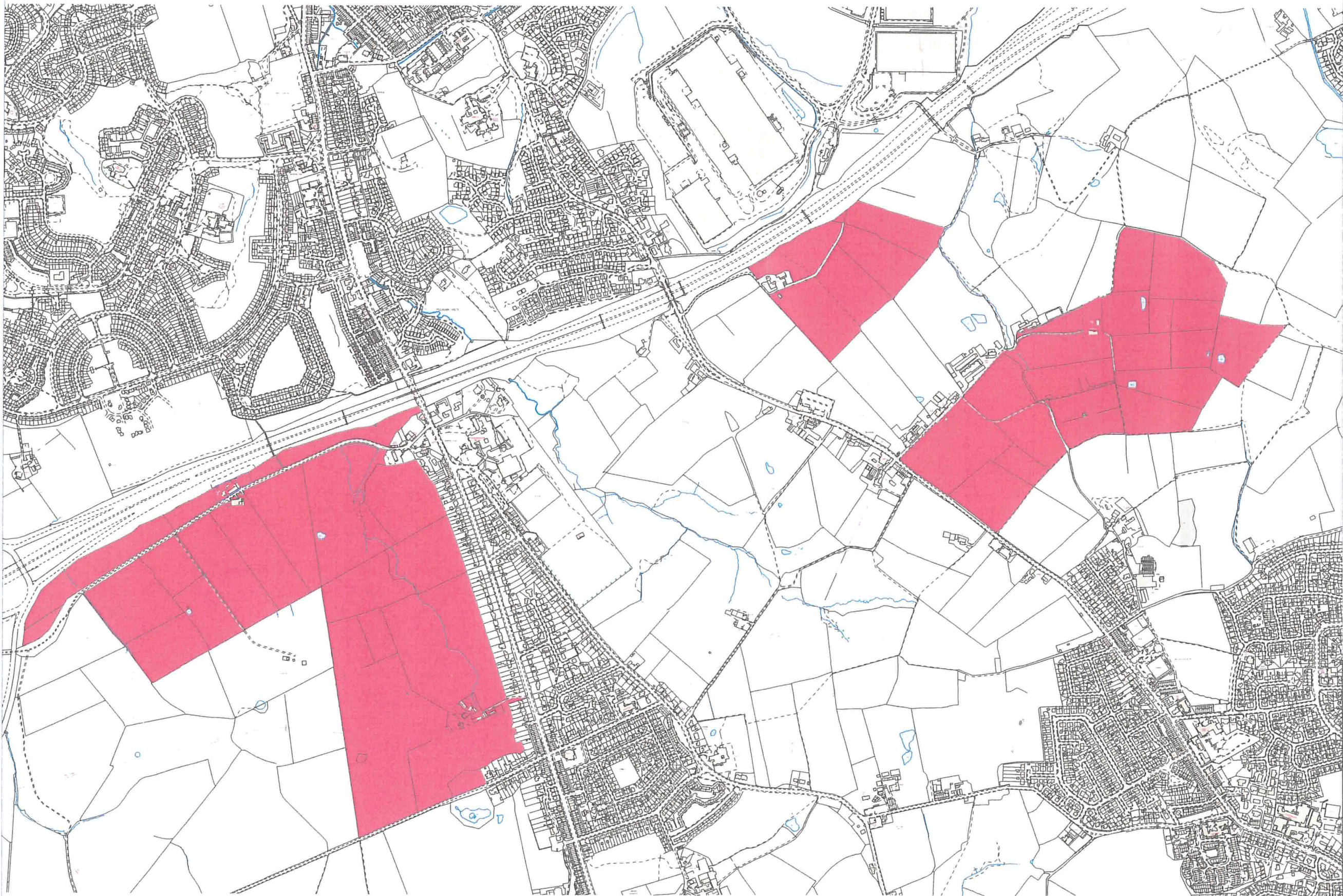
Masterplanning

- 7.6. We do not agree that the whole of the allocation needs be in accordance with a comprehensive masterplan.
- 7.7. Criterion 1, as currently drafted is contrary to paragraphs 11 and 59 of the NPPF. It is also contrary to paragraph 44d) of the NPPF. Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall.
- 7.8. Artificially restricting sustainable development until after a masterplan has been agreed, would be contrary to NPPF paragraph 11 that applies a presumption in favour of sustainable development and paragraph 11a) that requires plans to be sufficiently flexible to adapt to rapid change. It would also be contrary to NPPF paragraph 59 (the Government's objectives of significantly boosting the supply of homes) and paragraph 80 (the Government's ambition to building a strong, competitive economy).
- 7.9. Development of the land promoted by the Milne Trust in the short-term, for which a masterplan is progressing, would constitute sustainable development and it could appropriately be delivered ahead of any masterplan for the wider allocation.
- 7.10. The sites, despite their washed over Green Belt designation, have a number of urbanising features and urban sprawl would be restricted to the limits of the M62 to the north and Rochdale Road to the west, and the site ownership boundaries. It is therefore appropriate that the sites have been identified for mixed-use development in the GMSF.
- 7.11. Given the context, the sites can come forward in advance of any masterplan. Employment land and housing would be designed so that it sensitively integrates with the existing urban area, provides an appropriate mix and quantum of floorspace and housing and delivers affordable housing to meet the identified need. Waiting for an allocation-wide masterplan to be developed would serve no purpose on this particular part of the allocation which already has a masterplan progressing. Instead, it would frustrate the delivery of sustainable development in the short-term.

Criterion 5

- 7.12. Noting that access to and from the allocation will be required via a new spur from junction 21 of the M62, secondary access points are crucial in bringing forward available and deliverable parcels within the allocation in the short-term. The significant infrastructure requirements to facilitate a single in and out access from junction 21 of the M62 and the associated internal allocation highways works will constrain development in the short-term.

Appendix 1



All levels and dimensions must be checked on site by contractor prior to commencement of works. Any variations must be reported to Millson Associates Ltd.

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XX REVISION HISTORY		XX	XX/XX/XX
Rev:	Comments	By	Date
Client:			
Mline Trustees			
Project:			
BUERSIL HEAD - OLDHAM ROAD			
Drawing:			
LAND OFF OLDHAM ROAD FOR SUBMISSION TO GMSF			
Drawn:	Checked:	Date:	
LS	PJM	25/06/18	
Scale:	Size:	Rev:	
NTS	A1	-	
Status:	SUBMISSION		
Byron House 10-12 Kennedy St Manchester M2 4BY		0161 228 0558 www.millsonassociates.co.uk info@millsonassociates.co.uk	
Project Number: 2299		Drawing Number: 2299-PL-01	
Project - Origin - Zone - Level - Type - Role - Number			

