



Places for Everyone Consultation Response

REPRESENTATIONS ON BEHALF OF
SAVE GREATER MANCHESTER'S GREEN BELT (SGMGB)

SEPTEMBER 2021

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Professional Qualifications and Experience

Leith Planning Ltd

Chris Plenderleith BA (Hons) MRTPI is the Executive Chairman of Leith Planning Ltd and recognised nationally as an 'expert' in relation to Town and Country Planning. Chris Plenderleith's experience includes:

Publications

Chris has written in the Parliamentary Review in 2017, 2018, 2019, 2020 and 2021 on best practice in town and country planning. For over 20 years he has also contributed to the updating of a leading work, "Planning Law Practice and Precedents", published by Sweet and Maxwell, co-authors Robert Turrall-Clarke and Stephen Tromans QC. Chris wrote an article with Sasha White QC of Landmark Chambers, published in Issue 4 [2015] of the Journal of Planning and Environmental Law, entitled 'Access to Environmental Information: 30 Years On [2015] J.P.L. 409. Chris has also written an article with Michael Bullock in the Journal of Planning and Environmental Law entitled: "Holy Grail: Delivering Housing Need".

Beachcroft Wansboroughs (Solicitors)

For over 10 years Chris was retained as a planning consultant to the Planning and Property Litigation Law Group of DAC Beachcroft (Solicitors) based at their London offices, who have a national practice. Whilst working for DAC Beachcroft he regularly acted for the Secretary of State for Health. Chris presently acts for and alongside several national and international law firms, including DAC Beachcroft, Nicholas Solicitors, Thomas Eggar and Field Fisher, providing expert planning advice and evidence in High Court Proceedings.

High Court Litigation

Chris has acted as a planning consultant on several matters involving High Court litigation which are reported in the Journal of Planning Law. These include:

(1) Conditions – Implied Clauses: R. (on the application of Sevenoaks DC) v The First Secretary of State and Pedham Place Golf Centre [2005] J.P.L. 116 and see article [2004] J.P.L. 1174 which is considered to be one of the leading cases on conditions - implied clauses. The case is referred to in Lord Hodge's Supreme Court judgement in Trump International Golf Club Scotland Limited v Scottish Ministers [2015] UKSC 74. See also Current Topics, 'Construction of planning permissions: Whether possible to imply terms' [2016] J.P.L.315.

(2) Appearance of Bias (Listed Building): Also, Georgiou v London Borough of Enfield, Cygnet Healthcare Ltd, Rainbow Developments, Mr J C and Mr J Patel [2005] J.P.L. 62, which involved the appearance of bias.

(3) Unlawful Highway Works: Chris acted as the planning consultant in a High Court Litigation Case against Transport for London (Claim No HQ01X04923) in relation to re-instatement of an access and unauthorised highway works, Transport for London conceded

that their works were carried out unlawfully. Resolving this matter, Chris instructed Stephen Sauvain QC.

(4) Trespass Associated with a Gas Main: Chris also acted for Southern Gas advising on the matter of trespass associated with a high-pressure gas main.

(5) Professional Negligence: Chris has previously acted as a planning expert in relation to a matter in the High Court, Chancery Division (Claim HC10C04261) advising on professional negligence and town and country planning.

(6) General Permitted Development Order (Part 3 Class F): Chris also acted for Eames London Estates Ltd. in connection with Valentino Plus Ltd v Secretary of State for Communities and Local Government (CO/3138/2014) involving the interpretation of the General Permitted Development Order (Part 3 Class F) see Valentino Plus Ltd v Secretary of State for Communities and Local Government, Cowan, Eames London Estates Ltd and Kensington and Chelsea RLBC [2015] J.P.L. 707-713.

(7) Legal Duty under S 38(6) of the Planning and Compulsory Purchase 2004 Act (Listed Building): Chris acted for Nicholas Hofgren and Sophie Conran in High Court proceedings in The Queen (on the application of Nicholas Hofgren and Swindon Council and INRG (Solar Parks)12 Ltd CO/143/2015. There were four grounds of challenge in these proceedings:

Ground One: *The Council failed to comply with its legal duty under section 38(6) of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act") to determine the application for planning permission in accordance with the development plan unless material considerations indicated otherwise.*

Ground Two: *The Council misapplied paragraph 14 of the National Planning Policy Framework ("NPPF"), which was a material consideration in determining the planning application.*

Ground Three: *The Council failed to comply with its duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act") to have special regard to the desirability of preserving the setting of listed buildings in the vicinity of the Site; and*

Ground Four: *The Council breached a legitimate expectation created by its Statement of Community Involvement in respect of the publication on its website of documents associated with the application prior to the determination of the application.*

(8) Procedural Unfairness: Chris acted for Manou Radpour in High Court proceedings in Manou Radpour v Trafford Council and Dr.Z.Alvi re. 9 Bow Green Road, Bowden, Altrincham C/O/2066/2016. The Claimant's submissions in summary that the Defendant – by failing to require a tree survey, failing to consult the relevant Tree Officer, failing to consult the relevant Tree Officer, failing to require a bat survey, and failing to consider parking provision, highway safety and impact on residential amenity – (1) breached the statutory duty under section 197 of the Town and Country Planning Act 1990 to ensure appropriate provision for the preservation of trees adjacent to the site; (2) failed to understand and apply

planning policy and guidance concerning the protection of trees and bats; (3) failed to take into account material considerations and to exclude immaterial considerations and (4) caused procedural unfairness.

Position Statement

The Places for Everyone (PfE) Publication Plan sets out the vision for development within Greater Manchester up to the year 2037, within the nine authorities signed up to the Places for Everyone Plan. The vision sets out growth plans for jobs, new homes, and sustainable growth across the Plan area.

The Plan sets out the amount of new development that will come forward across the nine authorities in terms of housing, offices, industry, and warehousing. It supposedly identifies the important environmental assets across the conurbation which will be protected and enhanced. Furthermore, it defines a new Green Belt boundary for Greater Manchester.

We have been instructed by Save Greater Manchester's Green Belt (SGMGB), which is an umbrella group for Green Belt and Green Space groups across Greater Manchester (full details of which have been included at Appendix 1), to review the publication draft Plan and to comment as appropriate.

There are aspects of the PfE Publication Plan which have considerable merit and our client (SGMGB) wholeheartedly supports inclusive economic growth, provision of much needed homes and protection and enhancement of the natural environment. However, our clients have a number of significant concerns with the Plan as drafted, and its ability to meet the tests of soundness for the reasons laid out below:

- **Homes:** Our clients have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be seen to be being realistic. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.
- **Affordable housing:** The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound. We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.
- **Green Belt:** The Plan sets out an area of Green Belt release to meet the perceived housing need across the nine authorities. However, insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been

insufficient assessment of reasonable alternatives. In order to address this issue, the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.

- **Case for Very Special Circumstances:** The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.
- **Evidence Base:** As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.
- **Allocations:** A significant number of the proposed site allocations are unjustified and not well located. Many of the sites will have detrimental impacts on the highway network, are at risk from flooding and not well located for access to services, facilities and public transport. Many others will have significant impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. These proposed allocations are therefore deemed to be unsustainable and unjustified and should not be being promoted. The proposed allocations should be re-assessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan. In short, we are asking that the Plan ensure the delivery of the right homes in the right places, and the deletion of inappropriate and undeliverable sites from the Plan.
- **Covid-19:** Insufficient consideration has been paid within the Plan to the long term impacts of Covid, both on the economy and on human behaviours. It is clear that Covid has had a significant impact on the national economy, and whilst we are in a period of recovery, the long-term impacts on the high street are clear to see. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. Whilst the GMCA argue that the impact of the pandemic is too early to fully understand, there are clear trends resultant that are already apparent, and which could have a determinative impact on development within Greater Manchester. The Plan is therefore unsound as it fails to adequately assess current circumstances and is once again not prepared on the basis of a sound and robust evidence base. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, its High Streets and general housing and employment land requirements.

Section 1 - Context

Greater Manchester Combined Authority's Invitation

- 1.1 The Greater Manchester Combined Authority (GMCA) has invited comments on the Places for Everyone (PfE) – Publication Plan as part of Regulation 19 consultation - a statutory stage that provides an opportunity for organisations and individuals to submit their views on the soundness of the plan. The PfE Plan is a strategic regional planning policy document which seeks to identify and allocate land for development across Greater Manchester, and across nine local authority areas including Bury, Bolton, Manchester, Oldham, Rochdale, Tameside, Trafford, Wigan, and Salford. Once adopted the document will form part of the Development Plan and will need to be addressed within each authorities Local Plans as they evolve. The deadline for submission of representations is 3rd October 2021.

Instruction

- 1.2 Leith Planning Ltd has been instructed by the Save Greater Manchester Green Belt (SGMGB) Action Group to review the PfE Publication Plan 2021, and to make representations on their behalf. We can confirm that the SGMGB Action Group is a collective of 50 sub-action groups across Greater Manchester. The details of the action groups we are collectively instructed by has been included at Appendix 1. It should be noted that our clients represent the interests of in the order of 60,000 residents of Greater Manchester, and as such the weight to be attached to this submission is significant.

Submission Content

- 1.3 Having reviewed the content of the PfE – Publication Plan 2021, it is understood that the document is a joint development plan of nine districts which will determine the kind of development that takes place in their boroughs, maximising the use of brownfield land and urban spaces while protecting Green Belt land from the risk of unplanned development. Whilst we welcome the change in position to securing additional development in urban and brownfield locations over earlier drafts of the Plan, we have significant concerns with the consultation documentation as published, specifically in relation to the robustness and reliability of the evidence base, and we wish to object to the proposed release of land from the Greater Manchester Green Belt. We consider that as drafted, and for the reasons laid out below, the Plan does not meet with the Tests of Soundness.
- 1.4 It is noted that this is the final opportunity to comment on the draft plan prior to submission to the Secretary of State for Examination.

Section 2 - Legislation and Regulations

Legislation

Planning and Compulsory Purchase Act 2004

- 2.1 In drafting these representations due regard has been paid to the content of The Planning and Compulsory Purchase Act 2004 and the duties it places on Local Planning Authorities. Particular attention is drawn to the following sections:
- 2.2 Section 19 refers to the need to keep an up-to-date evidence base. Section 19 details the process required in the preparation of Local Development Documents and reads:

19. Preparation of Local Development Documents

(1)[F1Development plan documents] must be prepared in accordance with the local development scheme.

[F2(1A)Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.]

[F3(1B)Each local planning authority must identify the strategic priorities for the development and use of land in the authority's area.

(1C)Policies to address those priorities must be set out in the local planning authority's development plan documents (taken as a whole).

(1D)Subsection (1C) does not apply in the case of a London borough council or a Mayoral development corporation if and to the extent that the council or corporation are satisfied that policies to address those priorities are set out in the spatial development strategy.

(1E)If a combined authority established under section 103 of the Local Democracy, Economic Development and Construction Act 2009 has the function of preparing the spatial development strategy for the authority's area, subsection (1D) also applies in relation to—

- (a)a local planning authority whose area is within, or the same as, the area of the combined authority, and
- (b)the spatial development strategy published by the combined authority.]

(2)In preparing a local development document the local planning authority must have regard to—

(a) national policies and advice contained in guidance issued by the Secretary of State;

[F4(aa) the local development documents which are to be development plan documents;]

(b) [F5 the regional strategy] for the region in which the area of the authority is situated, if the area is outside Greater London;

(c) the spatial development strategy if the authority are a London borough or if any part of the authority's area adjoins Greater London;

(d) [F6 the regional strategy] for any region which adjoins the area of the authority;

(e) the [F7 Wales Spatial Plan] [F7 National Development Framework for Wales,] if any part of the authority's area adjoins Wales;

(h) any other local development document which has been adopted by the authority;

(i) the resources likely to be available for implementing the proposals in the document;

(j) such other matters as the Secretary of State prescribes.

(3) In preparing the [F10 local development documents (other than their statement of community involvement)] the authority must also comply with their statement of community involvement.

(4) But subsection (3) does not apply at any time before the authority have adopted their statement of community involvement.

(5) The local planning authority must also—

(a) carry out an appraisal of the sustainability of the proposals in each [F11 development plan document];

(b) prepare a report of the findings of the appraisal.

(6) The Secretary of State may by regulations make provision—

(a) as to any further documents which must be prepared by the authority in connection with the preparation of a local development document;

(b) as to the form and content of such documents.

2.3 Sections 20 to 23 relate to the Examination of local development documents through to document adoption and will clearly be addressed at later stages of the Plan Review process. It is assumed that the Greater Manchester Combined Authority has been mindful of the relevant sections of the Planning and Compulsory Purchase Act in the preparation of this plan. However, for the reasons laid out throughout this report we are concerned that the evidence base as currently draft is insufficient to

meet the tests of soundness. The documentation is inconsistent, incoherent in parts and does not currently justify and support the Plan as drafted.

Regulations

2.4 The referable regulations governing Local Plans are contained in The Town and Country Planning (Local Planning) (England) Regulations 2012 (the 'Regulations'). The Regulations set out the Duty to Cooperate, the form and content of Local Plans, public participation, Local Plan preparation, Independent Examination through to document adoption. Once again, it is assumed that the Greater Manchester Combined Authority will have paid the necessary regard to the content and requirements laid out within the Regulations in the preparation of this plan.

2.5 We specifically would like to address the issue of the Duty to Cooperate with Stockport Council following their withdrawal from the wider Greater Manchester Spatial Framework process in December 2020. In that regard attention is drawn to paragraph 7.23 of the Statement of Common Ground dated August 2021, and which advises that:

“In March 2021, Stockport Council requested whether the nine districts were still willing to accommodate similar levels of Stockport Council’s housing and employment need as in GMSF in PfE. As outlined in paragraph 15 above, the 30% of housing need which Stockport was not accommodating in GMSF 2020 was never identified as an ‘unmet’ need, it was the outcome of the agreed spatial strategy. Paragraph 11(b) of the NPPF applies a presumption in favour of sustainable development and requires strategic policies to provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, subject to the caveats set out in that paragraph. To the best of our knowledge, Stockport have not yet carried out an assessment of capacity to meet its own needs and have not indicated whether they have unmet need, and until this assessment is carried out it is too early to be able to have conclusive discussions on potential distribution of development needs.”

2.6 Further attention is drawn to paragraphs 7.25 through to 7.27 of the Statement of Common Ground which go to detail that:

“7.25 The timetable for Places for Everyone, anticipates a consultation on a Regulation 19 plan anticipated in August 2021, Submission January 2022 and Examination and Adoption by 2023. Papers to begin the process are scheduled to be published on 12 July 2021. At this point in time, the nine districts do not have an evidenced understanding of what the Stockport land supply position is, and the assumptions underpinning Stockport’s assessment of it.

7.26 Stockport is intending to consult on a Regulation 18 (Issues and Options) in Summer 2021.

7.27 In the light of this, the districts are seeking to agree a process for future engagement between Stockport Council and the other nine districts regarding the proposed scale and distribution of development across Greater Manchester, which both respects the process for developing the Stockport Local Plan and does not hinder the timely progression of Places for Everyone.”

- 2.7 There are serious concerns that the PfE Plan is going ahead at this stage without sufficient clarity on the Duty to Co-operate with Stockport Council. Given that the statement of Common Ground appears to intimate that the remaining 9 authorities may be willing to accommodate some of Stockport’s housing and industrial land needs within the plan, but that the level of need in some areas is as yet unspecified, does raised serious concern as to the robustness of the Plan as consulted on and its ability to meet the test of soundness on effectiveness. It would also appear to indicate that in reality that Stockport Council remains within the Plan area in all but name, and the associated impacts of that have not now been suitably considered, despite paragraph 11.23 advising that the publication document does not accommodate any unmet need from a neighbouring authority.

Section 3 - National Planning Policy Framework (NPPF)

- 3.1 The latest draft of the National Planning Policy Framework was published in July 2021. The relevant key determinative extracts of the NPPF have been included at Appendix 2 of this submission as they relate Local Plan preparation, housing needs and changes to Green Belt boundaries.

Comment on the NPPF

- 3.2 It is our view that the draft PfE Publication Plan has failed to meet the tests of soundness as laid out within the National Planning Policy Framework. As published the document does not adequately address the delivery of affordable homes, nor does it sufficiently demonstrate exceptional circumstances to justify the release of land from the Green Belt. The Publication Plan has not had due regard to the provisions of the latest draft of the NPPF, and specifically Section 13, Paragraph 141 and the strategy to be assessed in relation to justifying that exceptional circumstances exist to change Green Belt boundaries. Further, that the tests of soundness have not been achieved, in that the Plan as published is not justified (as there are serious questions in relation to the evidence base documentation), has not been positively prepared with an inadequate lack of focus on urban first land allocations, and will not be effective at protecting future Green Belt release across the Plan area, or promoting the regeneration of the urban areas of Greater Manchester.
- 3.3 We therefore cannot support the Publication draft of the PfE Plan in its current form, in circumstances where it is not consistent with the provisions of the NPPF with regard to Plan Making, meeting housing needs and Green Belt release.
- 3.4 We are willing to work proactively with the GMCA to discuss matters raised within our representations such that the views and concerns of the Greater Manchester community can be fully understood. We have also set out within these representations how the Plan can be duly amended to secure its soundness, and to address the key concerns of the communities affected by these development proposals.

Section 4 - National Planning Practice Guidance (NPPG)

- 4.1 The Greater Manchester Combined Authority must pay regard to the relevant extracts of the National Planning Practice Guidance, including the Duty to Cooperate, Local Plans and Housing and Economic Development Needs Assessments. Included at Appendix 3 are extracts of the guidance on Plan Making and the Duty to Co-Operate.

Comment on the NPPG

- 4.2 Given that Stockport Council have now withdrawn from the Greater Manchester Spatial Framework it is imperative that the GMCA ensure that any agreement reached on the Duty to Co-Operate, with this now neighbouring authority, as well as other neighbouring authorities, is clearly and transparently negotiated and published. As set out in earlier sections of this consultation response, it is our view that the PfE Plan does not currently comply with the requirements of the National Planning Practice Guidance as it has not secured cooperation and clarity on cross boundary issues with Stockport prior to undertaking the Regulation 19 consultation.
- 4.3 It is assumed that the PfE Plan has been produced in line with the requirements of the National Planning Practice Guidance, when read as a whole and not just in relation to the elements referred to above.

Section 5 – Places for Everyone - Evidence Base

5.1 In reviewing the context of the PfE Publication Plan due regard has been paid to the background evidence base (supporting reports) published alongside the consultation documentation. It is noted that the Plan is being taken forward on the basis of some of the documents supporting the GMSF2020 draft report, and in our view, this results in an incoherent plan, with inconsistent references to plan periods, development needs etc. Therefore, it would appear that the GMCA cannot demonstrate that the Plan will be based on a robust and justified evidence base and should not therefore pass the tests of soundness.

5.2 We would comment as follows on the content of the evidence base:

Integrated Assessment - Non-Technical Summary (July 2021)

5.3 From a detailed review of the document there are serious concerns in relation to the limited assessment of the Green Belt. Further that no assessment criteria have been proposed which are specific to the Green Belt to ensure that this important land asset is protected.

5.4 Given the protections afforded to the Green Belt within national and local planning policy, and the importance placed on its retention within the community, it is unacceptable that this key consideration does not feature more prominently within this report, and the other integrated assessment submissions. In short, how can the GMCA start from a position of urban first, and protection of the Green Belt, without having objectives and assessment criteria which seek to support that. It would appear that the release of land from the Green Belt to facilitate development was pre-determined, and the GMCA were keen to ensure that the Plan was drafted to allow this to be accepted as a matter of principle, as opposed to starting from a position of protection and retention of all Green Belt allocations, and a genuine urban first approach to growth.

Scoping Report (July 2021)

5.5 As was the case within the Integrated Assessments, the Green Belt is noted to not been listed as a key issue/objective within the scoping report. It would appear as though the Green Belt has been included within the wider issue of Green Infrastructure. Given the protections afforded to the Green Belt at a national level, and the importance of its retention to the local community this is simply not deemed to be sufficient or acceptable. In our view the Green Belt is an issue of such significance that it warrants its own assessment and consideration. Further, that the Plan should state at the outset the importance of the protection of the Green Belt as a matter of principle and key objective of the Plan.

5.6 In relation to another key Plan consideration of nature conservation, it is noted that the Scoping Report details the need to avoid damage/destruction to wildlife. In our view given the protections afforded to protected and priority species and their habitats within national legislation, the Plan should go further than to state 'avoid' The objectives in

the Plan should make it clear that the Plan will protect species diversity and habitat and will seek to promote biodiversity enhancement. Further, that destruction of wildlife will not be permitted, with extensive mitigation required to address any potential detrimental impacts.

- 5.7 As drafted the Scoping Report does little to provide comfort to the local community that matters such as landscape protection, wildlife protection and protection of the Green Belt are at the forefront of the Plan process. These elements should therefore be set out more clearly within the document and evidence base as detailed objectives and points of principle.
- 5.8 From a review of the Scoping Report and the draft Publication Plan it is understood that there are only limited policy changes proposed from earlier drafts of the GMSF. Such lack of active change to respond to earlier representation, and the failure to respond to the concerns of the local community in relation to the release of Green Belt land only adds further weight to the concerns that the proposed release of land from the Green Belt was pre-empted. Further, for the reasons laid out within this submission that such an approach has still not been sufficiently justified, in relation to the assessment of reasonable alternatives and as such the Plan could be deemed to be unsound.
- 5.9 From a detailed review of the Scoping Report clarification is sought as to why differing time periods have been included within the assessment of population projections, households projections etc. Specific attention is drawn to the following:
- ONS pop projections Table 7 – 2018-2043
Table 9 Households. 2018-2037
Table 6 Onwards varying dates/time periods
- 5.10 Given that the Plan period is understood to run until 2037 there is no justification for the use of ONS projections up to 2043. In addition, the use of changing time periods provides a lack of clarity and consistency in relation to the justification of the OAHN and one would question whether such inconsistency would in fact render the plan unsound. For simplicity, ease of understanding, transparency and consistency we would ask that the GMCA ensure that the draft Plan and associated evidence base is suitably amended to ensure consistency in its use of time periods and other important statistical and time-based information including the OAHN.
- 5.11 Table 10 is noted to use using 2014 projections, however in light of the recent amended guidance from the MHCLG we would ask that the housing projections be revisited and the case for the proposals set out in the draft Plan suitably justified.
- 5.12 As per the concerns raised above in relation to the inconsistent use of dates and time periods, it is noted at page 40 of the Scoping Report that the GMCA make reference to housing market data. Once again, this section includes an inconsistent use of dates across the nine authorities. For transparency and clarity once again any assessment and comparison of data sets needs to be consistent in relation to the use of time periods, otherwise a case could be made that the Plan as drafted is unsound. There

are also legitimate concerns that the document has failed to include the latest data sets on house sales. Given the ease of access to data from the Land Registry one would have expected some indication of data from 2020/2021 to have been provided.

- 5.13 The Scoping Report makes reference to the difficulty in predicting long term house prices due to market volatility (page 61). Clearly this is accepted, however on that basis one would argue how can you justify such a robust approach to the provision and calculation of the LHN, as clearly house prices and market volatility are directly linked to housing delivery and housing need.
- 5.14 Table 20, as included at page 67, sets out the information on empty homes. It is clear from the tabulation that there are a good number of empty homes within Greater Manchester which could be repurposed to assist in meeting housing needs. The significance of this issue should not be underplayed.
- 5.15 Table 21 as included at page 68 sets out housing completions for the period 2007-2018. Where is the evidence for housing completions for 2019 and 2020 as this information is readily available? Use of out of date information will raise questions on the soundness of the Plan.
- 5.16 On page 69 reference is made to the delivery of 200,000 homes between the period 2018-2037 as LHN. Clarification is sought as to whether this number is correct in circumstances where the draft Plan itself makes reference to almost 165,000 units at paragraph 1.36 (as well as 164,880 within draft Policy JP-H1 and 190,752 at table 7.1). Inconsistency within the evidence base and the draft Plan itself on such an important issue raises the question of soundness, including as to whether the Plan as drafted is effective. In addition, such an inconsistent reporting on a key aspect of the Plan will result in questions by the local community as to whether a Plan Review will be forthcoming shortly after adoption (if the inspectors find the Plan sound) which will simply result in an uplift in housing figures once the main principles of the Plan have been established. The Plan and evidence base should therefore be duly amended to ensure clarity and consistency on the OAHN figure.
- 5.17 In terms of Gross Value Added (GVA) addressed at page 73, clarification is sought as to whether the impact of Covid and the current economic challenges have been included and taken account of, in circumstances where there is no reference to this major economic impact at this part of the report. The impact of Covid on build rates and the economy will take some time to address, but it is clear that the impact will be severe and its effect on build rates, affordability and housing need will need more careful consideration to ensure the Plan is effective and positively prepared.
- 5.18 Another factor which will need to be carefully considered is the direct impact on the housing market from the increased need/ability to work from home. This will affect the nature and mix of new homes needed over the Plan period. Furthermore, it will have knock on implications on the need for office and general employment land. Should the trend of working from home continue, there will be reduced need for large office accommodation, with a potential move towards smaller shared spaces. The potential to repurpose buildings within High Streets and wider town centres also needs to be

evaluated. This could then potentially release additional brownfield sites and allocated employment sites for re-use for housing, further negating the need to release land from the Green Belt. In our view these new work trends will only increase as the country continues support and promote professional jobs which can be facilitated through working from home, and this will have a significant impact on the case for exceptional circumstances.

- 5.19 Whilst the document seeks to indicate a projected decline in the services sector, we would ask for evidence as to whether this trend is justified. From a review of the data, it would appear that there is a projected decline in Primary services in Salford, with growth in all other services. However, the document overall reads negatively, raising concern as to whether the data is reliable/skewed. Clarification is also sought as to how the impact of Covid on the jobs market has been considered in relation to jobs within the services sector.
- 5.20 On page 179 of the Scoping Report it is noted that there is very limited information on the Green Belt, with no detailed assessment on this key issue. The document does not sufficiently detail all approved incursions into the Green Belt in recent years. Residents would be keen to understand the total area of Green Belt lost to development in the last 5-10 years, such that an assessment of the incremental loss of this precious resource can be truly understood.

Statement of Community Involvement

- 5.21 It is of concern that the GMCA after a significant period of time have determined to consult on the draft Publication Plan during the main holiday season within the UK. Whilst the consultation period extends up to until the 3rd October, after a difficult and challenging year it is clear that this summer a significant number of interested parties would be away for a large part of the consultation period. This has severely limited third parties' ability to review and comment on the draft document, particularly given the scale of documentation being published. This has the potential to have prejudiced a number of third parties from participating in the consultation process.
- 5.22 When factoring in the extensive response process, and the completion of the relevant forms and surveys etc, it is clear that the consultation process is not straight forward, nor is it easy to engage and make considered representation. A number of third parties may therefore be put off from simply writing in to put their views forward as the consultation process is being presented as being unduly and unnecessarily complex. This may limit the number of objections and comments received on the draft Plan and given a misleading indication of a lack of community concern with the proposals. It is clear from our discussions with the action groups we represent that this is not the case, and the community at large are robustly against the release of Green Belt land to meet housing need, and their voice should be heard. E would therefore ask that additional time be provided to those who need it and that the GMCA make it clearer to people the various avenues available to make representations on the draft Plan.

- 5.23 We have been advised by local residents that in Rochdale a large number of residents were excluded from participating in the consultation. On 5th August 2021 RMBC adopted a new Statement of Community Involvement which stated:

“1.3 In light of the Government’s current guidance to help combat the spread of coronavirus (COVID-19), the Council has undertaken a review of this SCI. As a result, it has been necessary to make temporary amendments to the consultation methods contained in it to allow plan making to progress in line with guidance including requirements for social distancing and to stay at home and away from others. Along with these temporary changes, the Council is also proposing to remove its requirement to consult on future updates to SCIs. There is now no longer a requirement in legislation to consult on updates to an SCI which was confirmed in recent Government Guidance on plan making issued in response to the COVID-19 Pandemic.

1.4 We hope to provide appropriate opportunities for engagement by consulting the community where we can, and increasing the ways in which information is made available. We will prepare all future planning documents and determine all planning applications in line with the procedures established by this statement”

- 5.24 These changes to community engagement are understood to have been put forward despite the fact that all Covid restrictions ended on the 19th July over 2 weeks before, and as such residents have concluded that RMBC have taken the opportunity to exclude several vulnerable groups from planning consultations forever.
- 5.25 The impact of these changes includes the fact that RMBC have only provided minimum opportunities for residents without internet access to participate, in the form of 2 copies of the Main plan along with a Map of Policies (which was illegible) in each of the libraries that were open. There were no workshops or drop-in sessions. Anyone who does not have access to the internet at home is only able to see one of the many documents by going to a public library between 9.30 and 4.30 Monday to Friday (i.e. during normal working hours) and sitting down to read through the 123,350 words over 468 pages and the in excess of 90 supporting reports. It should be noted that the supporting documents were not available in the libraries so there was no way for members of the public to view them without internet access. This effectively excludes several vulnerable groups from the consultation, particularly the elderly and the poorer members of society who would find it impossible to participate using just a mobile phone, even if they could afford to pay for the data allowance it would need to access the portal and respond. It is our understanding that local councillors have had numerous requests for help from bewildered pensioners who have no access to any information but who are keen to review the Plans and to participate in the consultation.
- 5.26 As a result, certainly in Rochdale and probably in other boroughs, it is considered that the PfE plan is unsound as it has failed to comply with the statutory duty to consult with members of the public as stated in their own SCI:

“2.4 Ensure all consultation stages and the methods used are fully inclusive and provide all groups with the opportunity to become involved should they wish to.”

- 5.27 It is our view therefore that the consultation process has been flawed with insufficient active engagement with wider community groups and those harder to reach within the local community. The PfE is not therefore deemed to be legally compliant and further active engagement is required in advance of submission of the Plan for Examination in order to demonstrate that the Plan is effective, justified and sound.

Habitat Regulation Assessment (HRA) (June 2021)

- 5.28 From a review of the HRA published on the GMCA website it would appear to be somewhat lacking in detail, in particular the detailed assessment of cumulative impacts of proposed developments on protected species. Whilst it is understood that some limited additional information is provided on the strategic site allocations, there does not appear to be a comprehensive environmental assessment of the cumulative effects of such significant growth and development across the Plan as a whole, this clearly needs to be urgently addressed.

- 5.29 The published HRA does not provide any conclusions in relation to the likely impacts of the development and it is not therefore possible to provide meaningful representation, which is clearly unacceptable. Further, we have been unable to locate the details as to what true mitigation is proposed and where it will be provided. Clearly without clarity on such matters, and a clear demonstration of biodiversity net gain, the Framework will not address the requirements and the document will fail the test of soundness and is it will not be compliant with national guidance. Additional assessment and information on the ecological impact of the Plan therefore needs to be provided.

Site Selection Criteria (July 2021)

- 5.30 From a review of the site selection criteria report it is important to note that it does not appear to include any assessment of urban sites. Clarity as to why this has not been undertaken needs to be provided, as otherwise this would indicate an initial bias towards the release of Green Belt sites over and above the re-use/regeneration of brownfield and urban development sites. This approach does not reflect the wording at the outset of the draft Plan, and is clearly not compliant with national guidance, and would in fact result in the Plan being found to be unsound given the lack of due assessment of reasonable alternatives.
- 5.31 It is the view of the SGMGB that whilst the Plan as drafted sets out a policy of 'brownfield preference', the site assessment process fails to follow this approach and support its delivery as the GMCA have not identified all available brownfield sites at several stages, including:

1. Prior knowledge of Green Belt release - During the call for sites process it was widely known that Green Belt may be released. There was therefore a massive

incentive for developers to utilise this “once in a generation “opportunity to monetise their stocks of Green Belt land (in many cases held for decades), and no incentive to put forward brownfield sites. The increase in value from Green Belt agricultural land to land with potential for development is significant and unsurprisingly will have attracted numerous land owners to put their sites forward for development. Conversely brownfield sites are more difficult to develop, less profitable, and it will be easier to obtain planning permission in future so there was no incentive to submit brownfield sites.

2. Failure to properly identify Green Belt - As a result of the above in 2015-16 999 sites were submitted of which 59% were greenfield, a further 29.5% mixed greenfield / brownfield and only 11.5% PDL. With many developers understood to fail to confirm the Green Belt status of their sites within the submission forms.
 3. Preference for Large Sites - In accordance with NPPF para 73 (ex72), the site selection process showed a preference for large sites over small sites. As brownfield sites tend to be smaller there was an immediate bias in favour of the submission and delivery of greenfield sites, which directly contradicted the stated PFE policy of preference for brownfield.
 4. Confined search areas - Finally, the search was confined to Broad Areas of Search, which meant any site which was not in these areas was excluded at an early stage – despite the fact these sites may have been brownfield and more suitable and sustainable for development. Given that a stated policy aim of PFE is a preference for brownfield first the issue of early site identification needs to be re-assessed.
 5. Brownfield sites excluded - As a result, of the total number of PDL/mixed sites submitted it is understood that 249 available brownfield or mixed sites were excluded from the GM Allocations (see PFE 1452769656892 and PFE 1452773607228 in Rochdale alone). In total 1,738ha of available, non-greenfield land was excluded and could have been used to ease the pressure to release land for development in the Green Belt. If these sites were included large areas of the Green Belt could be protected for future generations.
- 5.32 The lack of a detailed assessment of all the reasonable alternatives to the delivery of new homes over the Plan period (in advance of the release of Green Belt) also supports the case that the Plan as drafted would fail to meet the tests of soundness. The GMCA therefore need to re-examine the assessment of alternatives, to allocate previously undesignated large areas of brownfield land for development within the main urban areas and to delete the proposed release of Green Belt land.
- 5.33 It is noted at Para 3.2 that the report states that the Local Housing Need (LHN) for the plan area is around 163,000. Clarification is therefore sought as to why the consultation draft report proposes 200,000 units in the scoping report. It is understood that the GMCA consider there to be sufficient baseline land supply. It would therefore appear as though there is already sufficient land provision within the Plan area when also factoring in empty homes to meet the needs of Greater Manchester without the requirement to release land from the Green Belt. Whilst the GMCA will no doubt argue the need for additional sites to secure flexibility in delivery, which is understood, there is no justification as to the level of flexibility and over provision being proposed, particularly in light of the removal of Stockport Council from the Plan area.

Furthermore, insufficient justification is made for the level and extent of Green Belt release and development on other forms of protected land.

- 5.34 In relation to the proposed employment needs it is noted that there is a stated need for around 3,330,000 of industry and warehousing land, with a baseline supply of 1,800,000, meaning a residual shortfall of around 1,500,000 sqm. However, the report also indicates that there is a need for 1,900,000sqm of office accommodation, but from a baseline of over 3,100,000sqm indicating an oversupply. Given that the provisions of the new E Class provide sufficient flexibility to move between commercial uses without the need for planning permission, it can be argued therefore that the real shortfall in provision is very limited, and further assessment should in fact be undertaken as to how much of that will be required in a changing economy with a projected long term increase in people working from home. The figures are clear, there remains insufficient justification to propose the release of Green Belt sites to meet the development needs of the GMCA over the plan period.
- 5.35 It is understood that the GMCA undertook an extensive authority based Call for Sites with a view to identifying potential land parcels for development and allocation. Given the concerns of local residents about the nature and scale of Green Belt release we would ask for further clarity as to why sites in urban areas have been dismissed, and why such sites which could offer regeneration and improvement of brownfield land in line with good planning practice was not deemed appropriate over the preferred release of land in the Green Belt. As drafted the consultation draft report, and the supporting evidence simply do not give residents sufficient comfort on this vital point and is therefore deemed to be unsound, given the lack of detailed assessment of reasonable alternatives.
- 5.36 In relation to the review of Green Belt release since the previous consultation it is noted that the statement indicates that 55 sites were being proposed for release from Green Belt in 2016. At which point the decision was taken by the GMCA to focus on fewer large sites rather than more smaller sites, hence the reduction to 51 sites proposed for allocation in the Green Belt in 2019. The evidence base report does not sufficiently justify why this approach was taken, how it best meets the needs of the Plan area, and how a simple reduction of just 4 sites can be seen to demonstrate a change in approach. In our view the approach has not been justified, is not effective and is unsound as it does not comply with national guidance, particularly in relation to the assessment of reasonable alternatives.
- 5.37 The site selection report goes on to address the issues of the GMSF Growth Options with paragraph 6.10 advising that the GMCA have not assessed all POS or safeguarded land, which would indicate that these areas are being protected from development on the understanding that there are not enough such protected areas in the urban area to meet the needs of the Plan. As such, there is perceived justification for the release of Green Belt land. However, we would seek confirmation that sufficient assessment has been undertaken on the amenity value of the existing greenspaces in urban areas, and why they require further protection over and above Green Belt development. We would reiterate our proposal that further assessment should be undertaken of all land parcels within the built up areas, and specifically previously

developed land to assess the potential for enhanced densities and effective build rates, and for these sites to come forward in advance of the release of precious greenspaces which simply cannot be reclaimed. Failure to undertake this assessment will simply render the Plan unsound.

- 5.38 This evidence base report also goes on to address the definition of previously developed land, and states that within each authority area this was based on officer judgement. This approach gives significant rise to the potential lack of consistency from authority to authority and raises the issue of potential bias within some authorities to limit their definition in order to protect their area from extensive new development. In reality, the definition of previously developed land should have been based on the NPPF definition, or alternatively a GMCA wide agreed set of tests/criteria against which sites were to be evaluated, with independent review of how the tests were being applied.

Growth and Spatial Options (July 2021)

- 5.39 It is of significance that within the Growth and Spatial Options report it is made clear that options could be brought forward within the GMCA which include no Green Belt release, options where no Green Belt release would be anticipated and options where no Green Belt, or only limited Green Belt would be needed for development. Given the importance placed not only by local residents, but also the community on a national level to the protection of Green Belt land, and given the provisions of section 13, paragraph 141 of the National Planning Policy Framework, it is our view that these further growth options need more detailed review, alongside options including increasing density of development on previously developed land. On the basis of the information currently available this approach does not seem to have guided the decision making process within the GMCA. In short, residents simply do not agree that all other options to meet the needs of the GMCA area have been sufficiently evaluated at this stage to justify the proposed release of Green Belt. The plan is therefore deemed to be unsound given the lack of assessment of reasonable alternatives.
- 5.40 It is also noted that the withdrawal of Stockport from the Joint plan has not resulted in any material changes to the growth options. However, the loss of one large authority surely needs to have been greater consideration in relation to its impacts on land release and Green Belt protection than simply minor amendments to the draft Plan.

Strategic Viability Report (2020)

- 5.41 It is noted that paragraph 3 indicates that it is too early to assess the impact of Covid on the strategic viability of sites. However, we would disagree. It is clear that the pandemic will have lasting and significant impacts on the national and local economy, and on the viability and deliverability of sites, particularly in relation to the provision of wider planning gain.
- 5.42 Concern is raised that paragraph 12 of the viability report states that within the GMSF there is a 50,000 affordable homes target, however this is not understood to be supported with a % target provision on housing sites. Clearly in order to secure delivery

and meet this identified need fairly across the nine boroughs, this issue needs to be urgently reviewed and clear guidance provided within the draft Plan in relation to the expectations on developers in assisting in meeting the needs of the GMCA community over the plan period. This will ensure consistency and a coherent approach to affordable housing delivery across the nine authority areas, will inhibit individual boroughs from proposing varied affordable housing targets within their own local plans, and secure the delivery of housing to those in need. Given that the GMCA report states at paragraph 22 that the 50,000 target cannot be met, this issue holds greater prominence and a failure to secure delivery of homes to meet identified needs is likely to render the plan unsound, given it fails to comply with the provisions of national planning policy.

- 5.43 Paragraph 8.3.6 identifies a potential significant shortfall in supply as a result of viability, although the level of shortfall is not noted to have been defined. Given the importance of meeting the housing needs of all persons within the Plan area, this needs to be addressed within the Plan with the GMCA bringing forward incentives and planning policies to support the redevelopment of brownfield sites in urban areas, and in the delivery of affordable housing.

Strategic Viability Report Stage 2 (June 2021)

- 5.44 Para 1.3.1 of the stage 2 assessment acknowledges the Planning White Paper but fails to consider it. Whilst the White Paper is yet to be brought into the force and may yet be scrapped, given the significant changes proposed to the planning system within the White Paper (with a focus on zonal planning) it simply cannot be ignored and should be addressed as the Plan progresses.
- 5.45 Para 2.2.1 set out a benchmark land value of £250,000 per gross ha for the viability assessment. However, given the size of the Plan area, there are widely varying land values, and we would therefore question whether the use of the £250,000 ha figure is sound and robust, when reviewing the viability particularly of sites within urban areas. In order to ensure a robust assessment on viability and housing delivery and to support a sound Plan, it is our view that viability and land values should be more location specific.
- 5.46 Unsurprisingly it is noted that the report summarises that the proposed sites within the GMSF are mostly viable. Given that the majority of land is proposed to be developed on Green Belt then clearly the costs as a matter of principle will be significantly reduced and sites will be found to be more deliverable. However, as shown within the site assessments included at appendices 5,6,7, 8 and 9 a significant number of these sites remain unviable given the issue of site constraints, and the Plan is not therefore sound as it is not being realistic in the sites being proposed for development.
- 5.47 We of the opinion that there are plenty more viable brownfield sites within the urban area which could deliver the much needed new homes and jobs across the Plan area, but the Plan needs to be more supportive of such an approach and to offer the necessary incentives to developers to deliver these in advance of developing land within the Green Belt. Once again, the Plan sets out a strategy for delivery of brownfield

land, however the policy framework fails to support such an approach. In fact, the Plan has failed to suitably assess a number of brownfield sites or to assess other reasonable alternatives in advance of the release of land from the Green Belt. The Plan as drafted is therefore unsound, and further assessment of alternatives and the release of urban sites for development needs to be given greater consideration, and sites proposed for release from the Green Belt should be deleted from the Plan.

Strategic Viability Stage 1 – Addendum (June 2021)

- 5.48 It is noted that the Addendum report does seek to address in further detail the impact of Covid-19 than the original Assessment, and this is clearly welcomed. However, it once again appears as though the consultants indicate that it remains too difficult to assess the longer term effect on housing market values and costs. Clearly, this takes us no further forward than the 2020 documentation and leaves a number of important unanswered questions, further raising concern in relation to the soundness of the Plan, and whether is it realistic and positively prepared.
- 5.49 The document does draw attention at paragraph 5.5 to an additional 120 sites within Manchester City Centre which will provide circa 5,000 units, and clarification is sought as to how these have been embedded into the land calculations and why there remains such a need for large tracts of Green Belt release.

Strategic Viability Report – Stage 2 Allocated Sites Viability Report (June 2021)

- 5.50 It should be noted that the concerns laid out at paragraphs 5.44 to 5.47 above on the original report appear to remain in force and have not been addressed within this addendum.

Carbon and Energy Policy Implementation Study

- 5.51 As we are all aware a climate emergency has been declared across the UK, and in fact by the GMCA in relation to the Greater Manchester region. As such the issues of carbon reduction and energy policies have never been more important. This study, which supports the draft Plan, highlights a lack of consistency and correlation within adopted Local Plan's with Plan targets on carbon neutrality. Not only does this raise concern regarding the issue of soundness, but would indicate a lack of commitment on the part of the GMCA to addressing climate change. This conclusion is only heightened by the preferred release of Green Belt over previously developed sites in urban areas, and the lack of assessment of reasonable alternatives, particularly in relation to sites which are well located and more sustainable than those currently proposed for allocation. Such an approach cannot be defined to be sustainable and is one the residents of Greater Manchester are simply unable to support. They therefore ask that the GMCA revisit the draft Plan and promote development on land well related to existing services, in urban areas and to delete all proposed development within the Green Belt. Further, that robust policies are put in place in relation to carbon emissions and energy generated within the developments.

GMCA Carbon and Policy Implementation Study part 2 – carbon off setting

- 5.52 This part 2 study indicates a potential commuted sum payment to assist in carbon off setting, with the fee understood to be being based on comparables elsewhere. The study does not however indicate whether the proposed cost of the carbon off set has been included in the viability assessment and deemed to deliverable and not to undermine sites from coming forward. Without clarity on this point the sites proposed for development and their associated draft policies simply cannot be found to be sound, as they are unjustified and the Plan cannot be seen to be positively prepared in relation to this issue of global importance.

Level 1 – SFRA Update (March 2019)

- 5.53 Having reviewed the strategic flood risk documentation published as evidence for the Plan, residents have serious and legitimate concerns regarding the potential impact of the scale and location of new development on surface water drainage and flood risk. This concern is heightened by the number of sites proposed for allocation within areas at risk from flooding. Despite the fact that such an approach does not represent good planning practice, this cannot be seen to be compliant with the objectives of the Plan, or to be demonstrating a sustainable pattern of development.
- 5.54 We would ask that clarity is provided by the GMCA as to which sites outside of an area at risk from flooding, and outside of the Green Belt have been discounted for development, and whether such sites could be reassessed as being more suitable to be brought forward for development as a 'reasonable alternative'.
- 5.55 Clarity is also sought as to whether all of the sites included in the 2020 consultation draft GMSF have been suitably assessed, in circumstances where the evidence base report would indicate that has been based on the 2018 call for sites.
- 5.56 It is noted that 91 proposed allocations will be required to pass the Exception Test, indicating that a large number of the proposed allocations are wholly unsuitable to be brought forward for development in relation to the matter of flood risk. Such an approach is clearly not fit for purpose and cannot meet the tests of soundness as there is insufficient certainty that the sites are deliverable.
- 5.57 It is noted that the report recommends that there are no allocations in flood zone 3b unless in exceptional circumstances, as well as other strategic approaches to limit flood risk including reviews of run-off rates, site specific flood risk assessments, use of SuDs, natural flood management techniques and phasing of development. Whilst one could argue that these are standard drainage principles on all development sites, they do not overcome the fundamental issue with the proposed development of sites on land at risk from flooding, which goes to the principle of the Plan and should be robustly rejected.

- 5.58 The SFRA appears to identify gaps in the data required to support the report. Clarification is sought as to whether those gaps have been filled, and the elements absent from the report addressed. It would appear that the consultants were rushed into completing the assessment in order to meet the original October 2020 Publication date. However, if the evidence base is not found to be robust the Plan simply cannot be deemed to be sound. As such, we would ask that time be taken to prepare an appropriately justified Plan, and whether some of the work has in fact been completed.
- 5.59 In relation to our concerns on the deliverability of sites at risk from flooding, attention is drawn to the following extract of the Level 1 SFRA which confirms the impact of proposing to allocate unsuitable sites which are at risk from flooding:

“GMCA will need to provide evidence through the GMSF to show that the housing numbers (and other sites) can be delivered, as will the individual LPAs through their Local Plans. The GMSF and Local Plans may be rejected if large numbers of sites require the Exception Test to be passed but with no evidence that this will be possible.”

Flood Risk Management Framework (March 2019)

- 5.60 The Flood Risk Management Framework makes reference to the January 2019 draft, so concerns are raised that the document would not appear to have been updated to reflect earlier consultation responses, and other recent legislative changes. The document would not therefore appear to be up to date, is not effective and is unlikely to be found to be compliant with national guidance, impacting on the soundness of the Plan.
- 5.61 The Framework states that more than 2/3 of proposed development sites require further action on flood management. This only heightens the case that the Plan as prepared is proposing to allocate sites that are simply not appropriate for development. In relation to the very large sites based in strategic locations and of strategic importance for future development, it is noted that most are at medium flood risk requiring action on layout and density, further highlighting how unacceptable they are, raising significant queries on deliverability and whether the Plan as drafted is effective and positively prepared. In our view for the reasons laid out above, and others set out within this submission, the Plan is not currently sound.

Greater Manchester Level 2 Hybrid SFRA (October 2020)

- 5.62 Paragraph 3.1 raises some concern on the reliability of the modelling data given the constraints to do a thorough assessment. As a result of these constraints, it is noted that more modelling is recommended. Once again raising concern about the reliability and robustness of the evidence base supporting the GMSF. Given the time lapsed from the draft 2020 report, we do not understand why such modelling information has not been collated and made publicly available.
- 5.63 Section 4 of the Level 2 SFRA states that the project brief included identification of broad opportunity areas for flood management including natural techniques such as

provision for flood storage areas in flood zone 2. It is noted that these areas are identified as 'opportunity areas' not 'safeguarded areas', as formally safeguarding these spaces in Local Plan's is not understood to be straight forward. However, there is no detail as to where these opportunity areas are proposed to be located and whether the landowner has given consent for the land to be turned over for flood storage. There also appears to be a lack of detail in relation to the implications of flooding certain parcels of land on the wider local areas and flood risk in general. The failure to demonstrate a robust case for allocation of sites means the Plan as drafted cannot meet the tests of soundness, and therefore more work needs to be undertaken to overcome these concerns and secure the delivery of a robust Plan.

- 5.64 The SFRA does not set out details for potential storage volumes and construction costs and indicates that more work is required in that regard. The lack of clarity on such key points once again raises questions on the reliability of the evidence base, and the overall soundness of the Plan. If you cannot demonstrate that proposed allocations have been assessed in detail and all found to be deliverable, then in reality you are not able to demonstrate that the needs of the Plan area are being met within the Plan period. Whilst there is an indication that some of these issues will be addressed at Local Plan stage, this will clearly be too late if the regional Plan has been adopted, and there is an expectation that allocated sites will come forward. If these sites are subsequently found to be undeliverable in relation to the matter of flood risk, it undermines confidence on the Plan led system, and will potentially result in additional Green Belt land being brought forward by developers as the GMCA and local authorities may not be able to meet their housing land supply requirements. This means that without ensuring the delivery of proposed allocations at this stage, the Plan simply cannot be found to be sound.
- 5.65 Once again it is noted that not enough time has been provided to complete the SFRA assessment, and that there will be an addendum at a later stage. However, no clarity is provided as to when this additional work will be undertaken. In short, what is clear in relation to the matter of flood risk is that a large number of sites are needing more assessment, and some may not pass the exception test. As such, more assessment needs to be done in advance of submission of the Plan to ensure that only sites that are available, achievable and deliverable are being proposed to be brought forward for development.

Flood Risk Sequential Test and Exception Test Evidence Paper (July 2021)

- 5.66 This report provides further detail on the use of the sequential and exception test with paragraphs 10.9 and 10.10 setting out the sequential test conclusions. The report states at paragraph 10.11 that sites are needed for development and therefore they are deemed to be sequentially accepted. Given that we remain concerned that insufficient assessment has been undertaken of land within built up areas and sites on land potentially at lower risk from flooding, we simply do not consider this to be a sound approach to Plan Making, does not justify the allocation of the requisite sites, nor is such an approach sustainable.

- 5.67 The report indicates that a number of sites will need to go through the exception test, with the exception test results being decided by the local authorities. This once again raises concerns about the independence of the assessments undertaken, and whether the outputs from each authority area will be reliable and consistent. Further, the consideration of future implications should these new homes be brought forward solely on the issue of need and at some point flood. It is our view that new homes should be located on safe and sustainable sites, and the Plan needs to give greater focus on the alternatives in areas which are more well located, outside of the Green Belt and in areas at lower risk from flooding.
- 5.68 It is noted that there is a proposal to keep in sites within the Plan which don't pass the Exception Test. This is not compliant with national guidance; albeit it is noted to be being justified on the basis that they are being identified for delivery in 10 years and will therefore allow more time for these sites to be revisited. As it stands 11 of the sites are not shown to be deliverable. Given that the timed release of sites within Development Plans are indicative, and that in reality many of the sites come forward once the Plan is adopted, there is an indication that sites are being proposed for development which are simply not suitable, nor that can be deemed to be achievable and deliverable at the time of adoption. This is clearly not acceptable, nor will this meet the tests of soundness in relation to an effective Plan and one that has been positively prepared.
- 5.69 Whilst paragraph 12.4 states that the sequential test and exception test has been met, for the reasons given above this is clearly incorrect.

Economic Forecasting (February 2020)

- 5.70 Whilst it is noted that the report date is Pre-Covid, there is some concern that the issue was not at least identified in the report given that the first cases had already been found in the UK, and the potential impact of the virus was already under discussion. Given this fact, and the significant impact of the global pandemic on the local and national economy, it is our view that the forecasts on growth and jobs growth are unreliable.

Note on Employment Land Needs for Greater Manchester (February 2020)

- 5.71 Page 1 of the report acknowledges Covid and the potential short and medium term impacts, but states there will be no long term impacts over 15 years. However, this cannot be confirmed, and the impact of changing lifestyles and work patterns and job creation could well be different over that time period and needs to be addressed.
- 5.72 The report focuses on B1, B2, B8, and we assume these references will be updated in due course to reflect the changes in the Use Classes Order and other potential impacts on the changes in the freedoms of the General Permitted Development Order.
- 5.73 Section 5 of the report sets out clear caveats and indicates a lack of confidence in the projections. This lack of reliability needs to be factored into the weight given to the report as part of the evidence base and whether it ensures an effective Plan.

Note on Employment Land Needs for Greater Manchester (March 2021)

- 5.74 This statement simply indicates the justification for the updated industrial, warehousing and office requirements laid out within the consultation draft of the Plan and as such we have no additional comments to make over and above those laid out elsewhere within this report.

Covid-19 and the GM Economy – implications for GMSF (August 2020)

- 5.75 This report is noted to be dated August 2020 and clearly the impact of Covid since that date has been extensive. In that regard this report is already out of date and unreliable. However, attention is drawn to the provisions of paragraph 1.4 where the authors outline that Accelerated Growth scenarios of 2019 were deliberately ambitious. Whilst we have no objection to the provision of an ambitious Development Plan, it is also important that the document is realistic and reflective of the current and future challenges faced over the Plan period. The Nicol Economic report (doc 50.01.03 para 1.7) GMSF Growth Option 2 uses a growth rate of 2.4% per annum. Over 16 year that results in a compound total growth of 46%, which seems unrealistic. Concern is therefore raised in light of Brexit and Covid, as to whether the Plan remains unrealistically positively prepared, and is projecting unnecessary levels of growth to support the growth projections. As it stands on the basis of the evidence available to us, the Plan is unrealistic and promoting levels of growth beyond what is deemed to be meeting identified needs. The Plan must therefore fail the tests of soundness and needs to be redrafted to reflect the current and future economic challenges and long-term impacts of Covid.

Covid-19 and the GM Economy – implications for GMSF (March 2021)

- 5.76 Attention is drawn to paragraph 1.8 which states that:

“In summary, to some degree as we are now a further seven months into the pandemic there is slightly less uncertainty. In part this is because as a result of the vaccine roll out there is more certainty about a route out of the wider economic lockdown restrictions. Furthermore, a TCA has been reached with the EU removing the prospect of a no-deal Brexit. Nevertheless, in reality, the path out of Covid-19 for the UK (and so GM) economy remains uncertain both in terms of speed and scale.”

- 5.77 The Plan continues to fail to seek to address the pressing impacts of covid-19 on the regional and national economy, which in itself continues to undermine the soundness of the Plan.

GM – SHMA (April 2021)

- 5.78 The document indicates an annual housing need for Greater Manchester of 11,392 new homes per year which actually equals 182,272 units over the plan period, which does not correlate with the need laid out within the Plan.

- 5.79 It is noted that table 5.10 sets out the provision of empty homes across the Plan area and it is noted that there are 11,081 empty homes within Greater Manchester, although this figure does include Stockport Council.
- 5.80 As laid out above there is concern that the OAHN has not been clearly defined within the draft Plan itself or within the supporting evidence base, with varying figures having been provided. The lack of clarity and certainty on this vital issue seriously undermines the Plan and its ability to meet the tests of soundness. We therefore ask that a defined OAHN figure be confirmed, and the plan duly amended to robustly justify this figure, and to ensure consistency across the Plan and relevant supporting documents.

Gypsy and Traveller and Travelling Showperson Accommodation (July 2018)

- 5.81 This report sets out a need for 58 additional pitches between 2017/18-2021/22 and 76 pitches between 2022/23-2035/36.
- 5.82 The report goes on to state that Gypsy and Traveller sites needed over the plan period is 134, but it is noted that 31 pitches are currently vacant, and as such there is only a need for 103 pitches. There is understood to be a need for 204 additional Travelling Showpeople pitches over the Plan period.
- 5.83 Given this report is dated 2018 confirmation is sought that this remains up to date and reliable.

Guidance for GM – Embedding GI principles – October 2019

- 5.84 This report is noted to set out a strategy in relation to how to create Green Infrastructure strategy/policy, and confirmation is sought that this can also be used to justify the protection of the Green Belt from development and encroachment.

Biodiversity Net Gain – February 2021

- 5.85 The document sets out guidance on achieving biodiversity net gain. However, it is important that this guidance is delivered within the Plan itself and the proposed allocations for development, particularly given the proposed scale for development on greenfield sites. Without a clear commitment and policy framework enforcing biodiversity net gain, it is our view that the Plan will not be compliant with national guidance and will not therefore be deemed to be sound.

Green Belt Assessment Stage 1 – July 2016

- 5.86 Section 4 of the Green Belt assessment sets out the quality of sites and the 5 purposes of allocating land within the Green Belt. On this basis it is noted that very large areas of Greater Manchester Green Belt make moderate-strong contributions to meeting the five purposes, and therefore only exceptional circumstances should come forward to justify its release.

- 5.87 It is therefore clear that the Green Belt in the Plan area serves many purposes and should in all aspects be protected from encroachment, particularly as very few areas are deemed to represent few or no contribution to the purposes set out in the NPPF.
- 5.88 Attention is drawn to paragraph 5.1 of the assessment which states that Greater Manchester Green Belt plays a particularly important role in restricting unplanned development and prevents coalescence and protects historic settings. The question therefore must be raised as to why such large expanses of release are being proposed, when clearly the Green Belt plays a vital role in urban regeneration and protecting sprawl and encroachment. As it stands there is simply not enough justification to progress the Plan as prepared, and we would ask the GMCA to reconsider their approach and to revisit sites discounted for development in urban areas, and to delete the proposed allocations that result in development coming forward on land currently falling within the Green Belt.

Stage 2 Green Belt Study – Assessment of 2020 Allocations

- 5.89 The Stage 2 assessment states that 46 sites are proposed for allocation across Greater Manchester, with 42 of those are partly or wholly in the Green Belt. This represents 91% of proposed allocations, which is completely unacceptable and indicates a real lack of consideration to the brownfield first approach.
- 5.90 Whilst it is noted that 56 new areas of Green Belt areas being proposed, there is no detail as to whether the new areas of Green Belt better meets the five purposes of than those being removed. In reality, reallocating Green Belt is not simply a case of quantum of replacement, but also quality and there appears to be no assessment or justification in that regard.
- 5.91 In our view a detailed assessment of both sites being proposed for release and those proposed to be allocated as Green Belt should be undertaken on a site by site basis, with separate assessments of harm. The individual sites should not be assessed as large swathes given the potential to outweigh the benefits and unfairly evaluate the impacts.

Stage 2 – GB Study 2019 Allocations

- 5.92 In reality the evidence base should simply be focusing on the 2021 proposed allocations and not those previously put forward.

Stage 2 – Green Belt study – Contribution Assessment of Proposed 2021 PfE Green Belt (June 2021)

- 5.93 The document provides some clarity on the extent of Green Belt changes to the Plan following the GMSF2020. It is noted that very limited changes have been proposed to have any meaningful impact on the extent and level of overall Green Belt release being proposed, and as such our concerns on the principle and level of release remain.

Our case for Exceptional Circumstances (July 2021)

5.94 The document is noted to fail to make reference to the most recent draft of the NPPF, and specifically the requirements of section 13, paragraph 141. Having read the case for exceptional circumstances we wish to comment as follows:

1. **No other viable development options** – This is incorrect, as demonstrated within the GMCA’s own Growth Options report which shows that there are options which could deliver identified needs without the need for Green Belt release. In addition, for the reasons laid out throughout this report we consider that there are reasonable alternatives which should be assessed, and which could be delivered without the need to develop within the Green Belt. On that basis this case for exceptional circumstances fails.
2. **Increased need for opportunities for employment** – Given the question marks over the long term impacts of Covid and Brexit, as well as the changes to people’s working patterns and increased working from home, it is our view that this statement is no longer justified and cannot be seen to support the case for exceptional circumstances.
3. **Need for more housing and buffer** – Whilst we have reservations about the methodology used to calculate housing need, and the lack of clarity on the OAHN, it is clear that over the plan period that there will be a need for more homes. However, the GMCA’s own evidence base would appear to indicate that there are growth options which can be brought forward to meet those needs without the requirement to release land from the Green Belt. These reasonable alternatives have simply not been robustly evaluated. Given that housing needs could be addressed without the need for Green Belt release it is our view that this cannot be used to support the case for exceptional circumstance.
4. **Provision of Sustainable Communities** – It is the view of the residents of Greater Manchester that the development of Green Belt land in advance of the efficient and effective use of urban sites simply does not meet the creation of sustainable communities. The fact that a number of these sites are in areas at risk from flooding, will result in detrimental impacts on the highway network, will result in environmental damage and many are poorly related to a settlement, only seeks to exacerbate this concern, and fails to make the case for exceptional circumstance.
5. **Harm to Strategic functioning of GB can be justified and net loss has been minimized** – Given that the majority of the Greater Manchester Green Belt is identified within the GMCA’s own Green Belt Assessment as being moderate to strong in meeting the five purposes of the Green Belt, we simply cannot agree with this statement. Furthermore, whilst a case can be made through allocation of new Green Belt land that the area of net loss has been minimized, no assessment appears to have been undertaken on the quality of the sites proposed for allocation and whether their allocation replaces quality of Green Belt land. Whilst deducting the “new” Green belt gives a reduced net loss of Green Belt land, the alternative Green Belt land is already green space and so this figure is meaningless. Also, whether the new areas of Green Belt meet the five purposes better than those proposed for release. It is clear from the site assessments of a number of proposed allocations (contained within the appendices to this report) that a significant number of sites being proposed for development will result in detrimental harm on the Green Belt, and there are no other material considerations which weigh in

favour of this case for exceptional circumstance. The true loss of Green Belt is 2,336.9 ha and the true loss of greenfield land is estimated to be 3,511 ha. In reality, the sites proposed for development within the Green Belt should be deleted from the Plan.

6. **Opportunities for beneficial use of remaining GB** – From a review of a number of allocations there are concerns that accessibility and linkages between sites and which facilitate access to the Green Belt have not been maximized. Further, that no provision is made within the Plan to offer wider beneficial use of the land either retained within the Green Belt or now being proposed for allocation. The Plan has failed to detail the opportunities for beneficial use of the sites now being proposed to be released from the Green Belt and the value these spaces offer to the local community. Such considerations are material to the Plan making process and clearly would not support the case being made for exceptional circumstance.
- 5.95 For the reasons set out above we do not believe that a robust case has been made for exceptional circumstances to justify either the scale or nature of Green Belt release proposed within the Plan. Further, nor is there any unmet need to justify 'exceptional circumstances'. The Plan as drafted is therefore unsound as it is not consistent with national policy, namely section 13, paragraph 141 of the National Planning Policy Framework and has not been justified or positively prepared in that it has not objectively assessed the area's needs. This is evidenced within the tabulation included below which shows that Green Belt release was originally proposed in 2016 to address the region's unmet need of 45,763 homes. However, since that earlier consultation population forecasts have reduced, the LHN has reduced and therefore the deficit in meeting housing need has been reduced. For example, the GMSF2019 had a land supply deficit of 11,697 homes but proposed to release Green Belt land to deliver 29,266 homes. The 2021 PfE population forecasts are noted to have further reduced the level of housing need, and alongside an increase in land supply there is now noted to be a surplus land supply of 5,529 homes. As such, there is no unmet need within the Plan to justify the release of Green Belt land, and certainly not to deliver 20,367 homes as currently proposed by the GMCA.
- 5.96 Whilst the case will no doubt be made in relation to the need for flexibility in the Plan, it is clear that once Green Belt sites are allocated for development they will be delivered, regardless of the delivery of development on brownfield sites and other land within the urban area. This is simply as a result of lower developer costs, ease of construction and speed for delivery. The document has chosen an unrealistic growth forecast over the life of the plan and no attempt has been made to seek to reduce local housing need despite the government allowing for this action. We therefore remain of the view that the case to justify the release of Green Belt land has not been made, the Plan is not consistent with national policy and is therefore unsound. The GMAC need to go back and reassess the provisions of brownfield and urban sites in light of the provisions of section 13, paragraph 141 of the National Planning Policy Framework, and should delete the proposed allocations which result in the release of Green Belt.

History of GMSF - Government minimum homes v GM land supply		GMSF 10		P4E 9	
	ONS version	ONS2014	ONS2014	ONS2014	use ONS2016
	Date of publication	Oct-16	Jan-19	Jul-21	Jul-21
	Years covered	2015-2035	2018-2037	2021-2037	2021-2037
	Plan duration	20 years	19 years	16 years	16 years
	Notes	original version	Burnham rewrite	2nd consultation, no Stockport	Illustrative using ONS2016
Population growth (1)	for information only	294,800	250,000	158,194	158,194
Minimum required new homes using ONS2014 (2)	IDENTIFIED NEED	227,200	200,980	164,880	111,113
per annum		11,360	10,578	9,699	6,536
Housing land supply before GMSF allocations (3)	LAND SUPPLY	181,437	189,283	170,409	170,409
Check for "unmet need"	DEFICIT/(SURPLUS)	45,763	11,697	(5,529)	(59,296)
	IS THERE UNMET NEED ?	YES - significant	YES - some	NO	NO
GMSF allocations - new homes on green belt from developer led call for sites (3)		45,763	29,266	20,367	20,367
				not needed	not needed
GMSF total land supply (4)	NEED/WANT	227,200	218,549	190,752	190,752
Total homes per person		0.77	0.87	1.21	1.21
Buffer BEFORE allocations		none	none	3.4%	53.4%
Conclusion of unmet need		"unmet need" some logic for green belt		no unmet need - allocations not required	
PFE Figures - source:					
(1) p130 - PFE Main plan	check	227,200	218,549	190,776	190,776
(2) From 06.01.02 GM Structural Housing Market Assessment					
(3) derived from Table 7.1 p129 PFE Main doc		unmet need	some unmet need	no unmet need	no unmet need
(4) Table 7.1 p129 PFE Main Plan		reasoned justification	some justification	no justification	no justification
ONS2016 LHN is calculated					

GMSF – Historic Environment Assessment – 2019

5.97 From a review of the heritage assessment it is clear that further assessment is required on 47 sites in relation to the impact of development on heritage assets. This is clearly not acceptable when they are being proposed for allocation. The impact of the scale and nature of development on heritage assets should be assessed prior to such sites being brought forward for allocation. Otherwise there is a risk that such sites will be removed from the Plan at a later date and the Plan will no longer be fit for purpose.

Evidence Base Commentary

5.98 As clearly shown in the above summaries there are a significant number of inconsistencies, anomalies and lack of clarity in a number of important and key evidence base documents to make the case that the draft Plan is unsound. Some of the evidence base would appear flawed and simply does not justify the scale and location of development being proposed across Greater Manchester.

5.99 It is therefore essential that the GMCA revisit the various reports and address the matters detailed above, in order to ensure that the plan is robust, fit for purpose, meets the tests of soundness and meets the needs of Greater Manchester’s residents in a suitable and sustainable manner.

Section 6 - Comments on the Places for Everyone (PfE) – Publication Plan

- 6.1 We have reviewed the PfE Publication Plan consultation draft report and would comment as follows on the proposed policies and paragraphs (please note that assessment of the proposed strategic allocation has been undertaken at section 7 and the relevant policy extracts from the Publication Draft have been included at Appendix 4):

Foreword

- 6.2 The GMCA set out that:

“We have a bold and ambitious vision for our city-region. We believe now is the time to be moving forward with an ambitious vision for a recovery focused on delivering good-quality affordable homes, creating good jobs, and boosting transition to a low carbon economy.”

- 6.3 We support this vision; however, we have concerns that the Plan as drafted is not suitably prepared to support and meet the needs of the Plan area. For example, the lack of policy direction on the provision of affordable housing is particularly of concern.

- 6.4 They go on to advise that:

“We all share the same priorities: we want to see better homes, better jobs, and better transport for everyone in our boroughs; we want to make the best use of brownfield land while protecting green spaces including Green Belt from unplanned development; we want development to happen in places where we want it, supported by necessary infrastructure and not be dictated by planning appeals...”

- 6.5 Once again, we would support the principles being put forward within the above statement. However, there are some concerns that the protection of Green Belt appears to be focused on preventing unplanned development, and not on protection of Green Belt from unnecessary release, within the Plan itself. The Plan does not therefore appear to be starting from a point of protecting the Green Belt, simply protecting it from unplanned developments. We would ask that this issue be revisited, and the Plan duly amended to offer stronger support to the protection of Green Belt land as a matter of principle.

- 6.6 The Foreword is noted to conclude with the following paragraph:

“We have now produced what we consider to be our final plan and the one we want to submit to the Secretary of State. But before we do that, we want you to tell us if you think we have provided the necessary evidence and complied with

the legal requirements and those arising from the duty to co-operate, the tests of soundness....”

- 6.7 For the reasons laid out at Section 5 of this consultation response (and below) on behalf of SGMGB Action Group we have significant concerns in relation to the evidence base to support the PfE Plan and the overall approach to growth and the extensive release of Green Belt land to deliver development. In that regard we do consider that the Plan meets with the tests of soundness and the necessary legal requirements and as such would ask that the Plan be duly amended to reflect the comments laid out within this report.

Introduction

- 6.8 **Paragraph 1.1** states that in January 2019 Greater Manchester set out bold plans to give people, communities and businesses hope and confidence for the future. They described how a pioneering Greater Manchester was ‘open for business’ globally, how we would thrive and prosper into the future, how we would support everyone to reach their full potential, and how we would ensure that nobody was left behind - the Future of GM.
- 6.9 Paragraph 1.2 outlines that ‘*our plans focused on delivering the collective ambitions in the Greater Manchester Strategy: a good start in life for everyone; good opportunities for our young people to equip them for life; good work and the best jobs in a valuable, productive, zero carbon economy; safe, secure housing in inclusive and diverse communities; a good cultural and leisure offer for everyone; a green city-region; good health and support for people to live fulfilling lives, with quality care for those who need it; to be a good place to grow older and to be a place where everyone is connected – socially, digitally and by a clean, integrated and accessible transport system*’.
- 6.10 Clearly no resident or business within Greater Manchester would object to the positive ambitions laid out above. However, it is gravely disappointing and of some concern that none of the ambitions detailed relate to the protection and enhancement of the natural environment, including the Green Belt. By failing to set out a clear strategy and ambition to protect the environment and Green Belt from inappropriate development has opened the GMCA up to the proposed case to build on precious and protected greenspaces. The loss of such land from within the Plan area will in fact undermine a number of the other ambitions including zero carbon economy, inclusive and diverse communities, good health, good leisure offer etc. We therefore ask the GMCA to revisit their proposals and set out a clear statement and ambition to protect Green Belt and wider environmental allocations and spaces from development as a matter of principle, to enhance the amenity of local communities, promote social inclusion, promote access to outdoor spaces (which is now more important than ever before) and promote biodiversity net gain and sustainable communities.
- 6.11 **Paragraph 1.4** notes that since the GMCA set out that vision and plans for the Future of GM, Covid-19 has had an unprecedented health and economic impact on the city region. It has affected every person and every business in every part of the boroughs; however, the impact has been unequal and unfair, starkly highlighting and deepening

the inequalities that have existed for many years and which they were beginning to change. There is now a substantive body of evidence proving that more deprived areas and ethnic minority communities are experiencing higher mortality rates from Covid than other areas and communities.

- 6.12 **Paragraph 1.5** indicates that the health impacts are ongoing, however the impacts on the economy are only just beginning to be understood. Many more people in our boroughs are now experiencing unemployment, businesses have closed or reduced staff numbers, with far more redundancies and business closures anticipated.
- 6.13 **Paragraph 1.6** states that Covid 19 has had a major impact on the way people live and work over the shorter term with a high degree of uncertainty over its impact in the long term. In response the Government has been very clear that we need to positively plan for recovery. The Government first made commitments to supporting economic recovery in mid-2020, for example with the Prime Minister's Build, Build, build announcement at the end of June 2020 setting a context for England as we recover from Covid-19.
- 6.14 **Paragraph 1.9** outlines that the emergence of a global pandemic in March 2020 rightly resulted in the Greater Manchester authorities pausing the production of the then joint development plan, the GMSF 2020, to understand what, if any, actions should be taken in relation to the level of development being proposed. An initial assessment of the potential impacts of Covid-19 on the economy, including the housing market, was carried out prior to the draft GMSF 2020 being considered by the Greater Manchester authorities. At that time, it was considered there was insufficient evidence (either at a national or local level) to change the assumptions behind our growth targets. An update to that initial assessment has since been carried out to inform the production of this Plan and although slightly over a year has passed since the pandemic emerged, the update concluded that there remains insufficient evidence to amend the assumptions behind the growth targets underpinning the PfE Plan.
- 6.15 Given that we are now some 18 months into the pandemic it is our view that the impact on health and the wider economy is better understood. It is therefore essential that the impact of the health crisis not only in relation to the social and economic impacts are better reflected within the Plan, but also the potential long term strategic impacts and behaviour changes the pandemic has had, including the acceleration of the deterioration of the High Street, the significant growth in working from home, reducing the need to travel for business and meetings etc. All of these and more have been directly affected by changes in behaviours as a direct consequence of the pandemic, and these behavioural changes will have long term impacts on the need for employment land, office spaces, retail, logistical warehousing etc as well as changing patterns of where people will choose to live and the ability to better use buildings within urban areas to meet the challenge of increasing housing supply over the plan period. We do not therefore agree that we are not far enough down the road to understand and address these issues within the PfE Publication Plan and the Plan should be duly amended to better reflect the known facts.

- 6.16 **Paragraph 1.10** sets out that whilst it is recognised that the country is in a state of flux, it is very clear that to delay the production of the Plan further could have a negative effect on the proper planning of the nine boroughs and therefore its recovery. Instead, it is considered appropriate to proceed, but to use the process of Plan review to monitor the situation and if necessary to undertake a formal review outside of statutory review timetable.
- 6.17 **Paragraph 1.12** indicates that it is vital that GM has bold plans, shaping a better future for GM – building back better - rather than a future being shaped by others, building back the same. Covid has exposed economic and societal issues to address, and the need for a new approach with people at its heart, which embraces diversity, tackles inequalities, builds resilience and rebuilds productivity.
- 6.18 Whilst it is important that emerging development plans are bold and ambitious, it is also vital that they are realistic and based on a sound and robust evidence base. In relation to the draft Plan the concern is that by failing to undertake a sufficiently robust assessment of the impact of Covid-19 on travel and behaviour patterns, the impact on the future of the High Street and the potential impact on meaningful jobs growth, and the impact of increased working from home, that the Plan is in reality set to fail. Being unduly positive can create a Plan which is unjustified and ineffective, and again whilst ourselves and our clients support the promotion of jobs, economic growth and the need to meet housing requirements across the nine boroughs, it must be based on a thorough assessment of the facts at the time of the plans production. Plans and proposals should not set unrealistic targets for growth, which are applying undue pressure to release land from the Green Belt, and certainly not before other viable alternative options have been rigorously evaluated.
- 6.19 It is our view that with changes to lifestyle and the acceleration of the decline of the High Street, that there could well be additional development opportunities within the urban area than were previously identified. We are simply asking the GMCA to revisit these proposals, ensure land is being effectively and efficiently used and that the GMCA protect the Green Belt from unjustified encroachment. It is noted that the GMCA support and agree with such proposals at **paragraph 1.12 to 1.15** where it is stated that:

“1.12 In these extremely challenging times, the need for bold ambitious plans for good quality employment are critical. We are striving to define our new ‘normal’ however we know that we need to continue to invest in our city and town centres to drive our recovery...”

“1.14 Our vision is to have capitalised on the opportunities highlighted by the recent pandemic, for example the increase in cycling and walking and the acceleration in flexible working and harnessed this to cement real benefits for our towns and cities. This offers a real opportunity to support the transition of our centres as they experience the continued (and possibly accelerated) decline in their traditional retail role.”

- 6.20 It is noted that the GMCA go on within **paragraph 1.14** to address the importance of greenspaces (copied below for ease of reference) and we look forward to working with the authorities as the plan progresses to ensuring this objective is met and the Greater Manchester Green Belt protected for future generations.

“...And one of the biggest lessons of the pandemic is the importance of good quality greenspace close to where people live. This is particularly important in our densely populated and deprived neighbourhoods. Urban greenspace is under pressure and needs to be protected and enhanced wherever possible. The proposals for the first city centre park at Mayfield is leading the way.”

- 6.21 In relation to the changes to the draft Plan following Stockport withdrawing from the process, attention is drawn to paragraph 1.24 which states that following an assessment on the impact of the changes, the conclusion was that the resultant impact on the overall strategy of the joint plan and its effect on the remaining nine districts is limited, and therefore PfE 2021 has substantially the same effect on the nine boroughs as the GMSF 2020. Our point would be that this clearly cannot be correct. The loss of Stockport and its associated land needs both within their area and outside, are still unclear, as set out within the Statement of Common Ground. Further, much has changed since GMSF 2020 was drafted that the Plan must be significantly different, and the approach for the nine boroughs directly affected to a degree which means it is more imperative that the supporting evidence is robust and justified.

- 6.22 We support the commitment and principles laid out at **paragraph 1.27** which states that:

“The Places for Everyone Plan reinforces our ambition to bring forward brownfield land, it reduces the net loss of Green Belt further from previous versions of the GMSF by reducing the number of sites being allocated, identifying a Broad Location and provides stronger protection for our important environmental assets. It enables us to meet our Local Housing Need, supports increased provision of affordable housing, promotes our new approach to town centres, supports wider strategies around clean air, walking and cycling and underpins the ambition to be a carbon neutral city-region by 2038.”

- 6.23 However, the Plan as drafted does not go far enough in relation to protecting Green Belt land from release, and insufficient consideration continues to have been paid to lifestyle and behaviour changes resultant from the pandemic on the ability to increase development for office and residential uses within main town centres, nor to increase densities etc on existing brownfield sites. It remains our view that the Plan simply does not go far enough to support the brownfield first strategy and needs to be rigorously reviewed. We would draw the GMCA's attention to the Inspector's report on the joint plan for Bristol, South Gloucestershire, North Somerset and Bath and Northeast Somerset, which has concluded that the Inspector's had significant concerns about fundamental aspects of the regions; housing plan, and how areas for development had been identified, including some sites within the Green Belt which may not pass the exceptional circumstances test. The issues raised by the Inspectors on that joint plan would appear to be of equal relevance to the Places for People Plan and sets a clear

warning to the GMCA that further work needs to be done on site finding, the assessment of reasonable alternatives and the need to protect the Green Belt.

6.24 In relation to job creation attention is drawn to **paragraph 1.28** which states:

“The majority of new jobs will be in the City Centre and wider Core Growth Area stretching from Port Salford in the west to the Etihad campus in the east as well as around Manchester Airport. This area encompasses established employment areas such as Trafford Park, locations such as MediaCity which has seen strong growth over more recent times and our Universities which are driving growth in world leading research and development.”

6.25 Given the need to secure sustainable development it is imperative that new job opportunities are located within areas well served by public transport. Such locations can be found within the main urban areas, and with a changing landscape within the High Street there would appear to be no need to release Green Belt land outside of the key urban areas to deliver these jobs. Development within the proposed allocations will lead to a significant increase in traffic and vehicle movements, and will not ensure jobs are well located for access to other key local services and facilities which could benefit economically from additional job creation in their local area, for example restaurants etc.

6.26 In relation to the issue of housing it is noted at **paragraph 1.36** that the number of homes now being proposed has been reduced to 165,000 over the plan period 2021-2037. However, we also note that the housing needs of Stockport have yet to be quantified and may impact on the Plan area within a Statement of Common Ground. Further, that the Plan is more than likely going to the subject of an early review which could see those figures increase further and applying greater pressure on the Green Belt. Our point is clear, it is essential that a robust and justified Plan is adopted in the first instance, setting clear development needs and limiting the potential for reviews, and further Plan changes in the years to come. Without such an approach there is clear uncertainty for local communities as to what can be expected in the years ahead and this undermines confidence in the Plan led system.

6.27 In relation to the delivery of new homes it is noted at **paragraph 1.37** that the GMCA indicate that they have been able to direct development to the most sustainable areas – primarily the city and town centres - and enable most efficient use of our brownfield land supply. For the reasons laid out within this report and the representations put forward by our clients, including the extensive provision of additional brownfield land for development, we simply cannot support or agree with the provisions of paragraph 1.37. We are of the view that the GMCA need to carefully reevaluate the urban sites previously assessed, and review the potential for increased development density, support for the remediation of brownfield land to enhance viability and to remove the proposed allocations on land currently situated within the Green Belt.

6.28 In relation to the provision of affordable housing **paragraph 1.38** indicates that the GMCA will have an ambition for 50,000 additional affordable homes over the plan period. Our clients have significant concerns that the level of provision of affordable

homes has only been identified as an ambition, not a target or a requirement, which raises significant questions as to how these homes will be secured and delivered, and the housing needs of the poorest households met and protected. Furthermore, additional clarity is required as to the mechanism by which these vital homes will be secured because in our opinion this is not sufficiently clear to secure their delivery and raises question on consistency of affordable housing policy across the Plan area.

- 6.29 The GMCA commitment to protecting green spaces is noted to be addressed at paragraph 1.40 which reads as follows:

“As part of this work we have identified our most important ‘Green Infrastructure’ – for example our parks, open spaces, trees, woodlands, rivers and canals which provide multiple benefits and make a huge contribution to quality of life, promote good mental and physical health and supports economic growth. Our strategic Green Infrastructure network is extensive. Around 60% is within the Green Belt and therefore is afforded significant policy protection. The remaining 40% does not meet the tests of Green Belt but it is very important for the continued wellbeing of our boroughs.”

- 6.30 The GMCA are clear in their commitment to protecting greenspaces for all. However, in our view the Plan as drafted fails to achieve this, with large areas of Green Belt land still being proposed for release and development. In short, the objective cannot be met, and the commitment not delivered. The Plan needs to be duly amended to ensure that commitments, aspirations and objectives are duly reflected within the Plan policy and allocations.

- 6.31 The GMCA go on to address issues associated with brownfield preference and advise at **paragraphs 1.42 and 1.43** as follows:

“1.42 The majority of development between 2021 and 2037 (the “plan period”) will be on land within the urban area, most of which is brownfield land. Within the plan period around 90% of housing, 99% of offices and 47% of industrial and warehousing development is within the urban area.

1.43 National planning policy does not support an explicit ‘brownfield first’ approach, as Local Authorities are required to be able to provide a 5-year supply of housing sites which are available and deliverable. If we cannot demonstrate that our brownfield land is available and then we are required to identify other land which is – this may be Protected Open Land or Green Belt.”

- 6.32 Once again we would support such an approach if our clients felt that a sufficiently robust assessment had been undertaken of development within the urban area, as opposed to the on-going release of Green Belt land. Whilst it is correct to say that authorities need to maintain a five-year supply of housing land, it is not reasonable to conclude that other land identified for development could include Green Belt. Case law and the NPPF is clear that a lack of a five-year land supply is not sufficient to justify exceptional circumstances to release land within the Green Belt, it is the exceptional circumstances test which the GMCA need to address before sites can come forward.

Furthermore, section 13, paragraph 141 of the NPPF sets out the clear tests against which exceptional circumstances can be made including making as much use as possible of suitable brownfield sites and underutilised land. The GMCA have failed to meet this test and as such the Plan will fail the tests of soundness. The GMCA therefore need to revisit the issue of reasonable alternatives and reassess the proposed allocations.

6.33 We wish to draw attention to the provisions of **paragraph 1.44** which reads as follows:

“We are however adopting a ‘brownfield preference’ policy – we will do all that we can to make sure that our brownfield sites come forward in the early part of the plan period however to do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.”

6.34 As the GMCA will be aware once the Plan is adopted there is little the nine boroughs can do in relation to which sites earmarked for development will come forward first, as once allocated a planning application can be submitted at any time thereafter. Furthermore, the reality is that the Green Belt sites will be the first to be developed given their ease, lack of contamination and enhanced viability. In our view the PFE Plan should not be being brought forward until the issue of support for remediation has been explored in full (as they have proposed at paragraph 1.45), as this could also assist in bringing forward other brownfield sites which have previously been found to be unviable and could then negate the need to release Green Belt sites over the plan period.

6.35 It is noted that the impact on viability on the delivery of previously developed sites is addressed at **paragraphs 1.45 and 1.46** which state as follows:

“1.45 Our Strategic Viability Study identifies challenges with a significant proportion of our land supply, and this is acknowledged within the plan by the provision of a land supply ‘buffer’. The recently announced Brownfield Land Fund is targeted at Combined Authorities and begins to help to address viability issues across the conurbation, but it is not enough. We are bidding for more funding but further discussions with Government are critical to enable the full potential of our brownfield land supply to be realised.

1.46 The plan supports the continuing renewal of our town centres, with an increase in the supply of land identified for housing. Our strategic approach to town centres is complemented by initiatives co-ordinated by the GMCA. Government has also recognised the need to strengthen the role of town centres and several of our towns have been successful in accessing funding through the Future High Street Fund and Towns Fund.”

6.36 We fundamentally and wholeheartedly do not agree with the justification as set out above. The reality is that Greater Manchester benefits from extensive areas of derelict, vacant and underutilized land within the urban areas, and all tools should be used to encourage and promote redevelopment and housing delivery within the locations.

Clearly it is more viable to build on Green Belt land given the limited costs and lack of contamination and remediation etc. However, in order to promote sustainable growth, safe places for people to live and work, and to meet the issues climate change etc, it is imperative that developers are supported in delivering brownfield sites in advance of unjustified greenfield development.

6.37 Factors which can be used to assist in the delivery of additional brownfield sites will include increased density of development, more effective use of space, use of increased height of development etc. To simply state that it is too costly to redevelop derelict sites is not sufficient to demonstrate strategic exceptional circumstances and justify the extensive release of large swathes of Greater Manchester Green Belt. We would therefore reiterate our request that urban sites be looked at once again, and if needs be by an independent body to ensure that all development options have been extensively evaluated as reasonable alternatives, and all land parcels are being delivered in an effective and efficient manner.

6.38 In relation to Green Belt sites the PfE2021 states at **paragraphs 1.47** and **1.48** that:

“1.47 Given the lack of sufficient land to ensure that our overall housing and employment needs can be met, it is considered that there is a strategic exceptional circumstances case to be made to release Green Belt for development. However, this release has been kept to the minimum and has been done in locations which will help to meet our overall vision and objectives. The strategic case and the detailed case for each strategic allocation is set out in the ‘The Green Belt Topic Paper’.

1.48 The release of Green Belt has not been proposed lightly and evidence has been prepared to demonstrate how the harm that this could cause to the remaining Green Belt land can be mitigated, including identifying opportunities to improve and enhance green infrastructure within the remaining Green Belt land. We are also proposing to add new Green Belt where we have identified land that meets the purposes of Green Belt. These proposals have been incorporated into the Places for Everyone Plan as part of the overall proposals.”

6.39 As set out above we do not consider that sufficient review and assessment of brownfield sites and reasonable alternatives has been undertaken to justify the scale and nature of land release from the Green Belt. The findings of the Inspectors report into the joint plan in Somerset would support this position. We would also draw attention to the comments made at Section 5 of this report in relation to the need to ensure that any additional land now being allocated for use as Green Belt is commensurate with that proposed to be lost, not just in terms of quantity, but also quality and amenity. It is not simply a like for like replacement in relation to hectare size, there needs to be a careful and detailed assessment as to the impact on the Green Belt and the local communities it serves from the loss of the sites proposed for release, and how the sites now proposed for allocation can be seen to better meet the Green Belt tests. We would also seek clarification as to why those sites proposed to now be allocated as Green Belt have themselves not been earmarked and or

considered suitable for development over and above the Green Belt sites they are understood to be replacing.

6.40 **Paragraphs 1.49 to 1.51** go on to outline that:

“1.49 The net loss of Green Belt has been reduced by nearly 60% since 2016 through: reducing the number of proposed sites reducing the loss of Green Belt within sites proposing ‘new’ Green Belt additions

1.50 The net amount of Green Belt land proposed for release is 1,754 hectares – in relation to the nine districts preparing this Plan, this means a 3.3% reduction in the size of the Green Belt compared to an 8.1% reduction in 2016.

1.51 The nine boroughs cover some 115,084 hectares, almost half (46.7%) is designated as Green Belt. The proposals in the Places for Everyone: Publication Plan 2021 would result in Green Belt covering just over 45% of the nine districts.”

6.41 If nearly 50% of the land in the nine boroughs is Green Belt as outlined in para 1.51, then why does the plan focus solely on the urban economy, industry and housing. No mention is made in the plan to the contribution that the existing rural economy makes to the prosperity of the region and the impact on that economy should Green Belt be lost. Whilst residents welcome the quantitative reduction in Green Belt release from earlier drafts of the Plan, communities continue to be concerned at the lack of effective delivery of brownfield development, particularly given the plethora of vacant and derelict sites within the conurbation, and the changes to come as a result of covid on both the High Street and demand for office and employment spaces. Our clients are simply asking the GMCA to adhere to their commitment to the Green Belt, and to ensure that the needs of the Plan area are met in the most appropriate and sustainable locations, and which protect the amenity and value of the Green Belt.

6.42 **Paragraph 1.52** of the Plan states that:

“This Plan sets out proposals to support the Greater Manchester ambition to be a carbon neutral city-region by 2038. A key element of this is to require all new development to be net zero carbon by 2028 at the latest – we do not want to build homes and workplaces which require retrofitting in the future, and we have set an ambitious target, backed up by our evidence to achieve this as soon possible. Our commitment to keep fossil fuels in the ground remains, at this time therefore we will not support fracking.”

6.43 Put simply, in order to meet the tests of climate change and limit the impact of development on the local, national and global environment, it is important to seek to identify and promote development in sustainable and suitable locations with good links to public services, facilities and public transport links. For the reasons set out at section 7 it is clear that a number of sites being proposed for development do not meet these requirements, and in reality, should not be deemed appropriate for development. In addition, securing development in locations which are well located for jobs, education

etc will limit the need to travel further reducing emissions, and the regeneration of urban areas, and redevelopment of vacant and derelict land all help to demonstrate the GMCA's commitment to climate change and the environment. As set out above there are elements of the approach to development by the GMCA which are simply not compatible with their declared aspirations and commitments and need to be redrafted.

Key Challenges

6.44 At paragraph 2.33 the GMCA list the key challenges for the Places for Everyone Plan and states:

“In light of these issues, the PfE Plan will need to:

- *Deliver high levels of economic growth to support prosperity of Greater Manchester, whilst ensuring that all parts of our boroughs and all our residents share in the benefits;*
- *Deliver the highest possible quality of life for all our residents and address existing problems such as health disparities and air quality that currently detract from it.”*

6.45 The key challenges are noted to fail to address important environmental issues such as climate change, and protection and retention of green networks, greenspaces and environmental networks. Given the importance to be placed on the benefits of greenspaces and the value of the Green Belt to local communities, as well as the declared climate emergency, it is clearly unacceptable that such a challenge is not being addressed as a key challenge within the Plan. The Plan should be duly amended to recognize these challenges.

Our Vision

6.46 The Vision for growth in Greater Manchester is detailed at page 37 of the consultation draft report and reads as follows:

“Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:

- *A place where all children are given the best start in life and young people grow up inspired to exceed expectations.*
- *A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand, you'll get it.*
- *A place of ideas and invention, with a modern and productive economy that draws in investment, visitors, and talent.*
- *A place where people live healthy lives and older people are valued.*
- *A place at the forefront of action on climate change with clean air and a flourishing natural environment.*

- *A place where all voices are heard and where, working together, we can shape our future”*

6.47 Residents support the overall objectives and principle of the Vision as laid out above, but do not consider that this has been duly reflected and promoted within the provisions of the draft Plan. For example, given the extensive release of Green Belt land it may be difficult to secure a flourishing natural environment, the lack of focus on remediating and developing derelict and vacant urban sites could undermine the aspiration to secure places where people live healthy lives. We therefore ask that the aspirations laid out within the vision be duly reflected with the draft Plan, policies and allocations and a coherent and consistent voice given to the protection of the Green Belt and wider environment.

Objectives

6.48 It is noted that the GMCA set out a number of objectives for the PfE Production Plan. Particular attention is drawn to the following examples:

- **Objective 1 - Meeting our Housing Need** – For the reasons set out within this consultation response there are legitimate concerns in relation to the robustness of the evidence base and the lack of clarity in relation to the potential for additional sites to come forward (1) once the Stockport area need has been confirmed and (2) when the Plan is inevitably revised shortly after adoption. Further, the Plan would appear to be unreasonably ambiguous when it comes to confirming the OAHN, for example table 7.1 would appear to indicate a need for 190,752 but from 2020 to 2037, where draft policy JP-H1 states a minimum of 164,880 net additional dwellings from 2021-2037 set against a forecast population growth over the plan period of 158,000. Again, this lack of clarity and consistency falls to the soundness of the Plan and as drafted, it is simply too ambiguous and inconsistent, and the Plan needs to be modified to show one clear and consistent OAHN figure;
- **Objective 2 – Create Neighbourhoods of Choice** – it is noted that this objective sets out a priority for the use of brownfield land, to focus new homes on the Core Growth Area and town centres, to focus development within 800m of public transport hubs, no increase in homes and premises at a high risk of flooding and prioritise sustainable modes of transport. As set out in detail at Sections 5 and 7 of this consultation response, the GMCA are failing to secure development which adheres to these principles, and as such it is clear that this objective of the Plan will not be met. This raises issues in relation to soundness with a focus on the effectiveness of the Plan and whether it has been robustly justified;
- **Objective 3 – Ensure a Thriving and Productive Economy in all Parts of Greater Manchester** – Once again it is noted this objective focuses on development of brownfield sites, ensuring adequate development land to meet the employment needs and securing a diverse range of employment sites and premises. However, the Plan as drafted has paid no regard to the impact on employment needs and growth patterns as a direct consequence of the Covid-

19 pandemic. Furthermore, we have not seen evidence as to how the GMCA are providing for a diverse range of employment needs, and in locations which the Plan itself identifies as a focus for growth, which is well served by new homes and potential staff.

- **Objective 6 – Promote Sustainable Movement of people, goods and information - For** the reasons laid out within this detailed representation and those put forward by third parties, the draft Places for Everyone report is not sustainable. The Plan is proposing sites for allocation in areas not well located for access to local services and facilities, and a number which are not well related to existing settlements. Sites are proposed in areas at risk from flooding, and a number with poor access to public transport connections. The Plan as drafted cannot therefore be deemed to be sound and needs to be duly amended to secure the right development in the right places, namely those outside of the Green Belt with good public transport connections, in areas well related to existing settlements and services, and not in areas at risk from flooding or which have significant environmental impact. If the GMA re-assess the reasonable alternatives in relation to land within the main urban areas, it is apparent that the needs of the region can be met more suitably and sustainably to ensure the tests of soundness can be met, and without the need to release land from the Green Belt;
- **Objective. 7 – Ensure that Greater Manchester is a more resilient and carbon neutral city-region** – It is noted that the GMCA propose to promote carbon neutrality by 2028, sustainable patterns of development, reduce car dependency etc. As detailed throughout this report there are concerns that in reality the Plan does not focus development in the right place, in areas with good access to public transport and with a joined up approach to jobs and housing delivery to limit the need to travel. The plan sets out good objectives and commitments on the environment, but sadly the draft policy framework and proposed allocations are not consistent with the same. The Plan is therefore incoherent and ineffective, and by virtue unsound. We therefore ask that the Plan be modified to ensure that the impact of development on the environment runs through each policy and allocation as a key issue;
- **Objective 8 – Improve the Quality of Our Natural Environment and access to Green spaces** – By simply not providing sufficient protection of Green Belt land, by proposing development in areas at high risk from flooding, and the proposed levels and scale of development with associated impacts on ecology, biodiversity and wider environment, it is clear that PfE will cause harm to green spaces, and will reduce people’s access to outdoor spaces in total conflict with objectives 7 and 8. The PfE clearly needs to be reconsidered. The lack of specific reference to protecting Green Belt land as an objective is also of significant concern.

Strategy

- 6.49 We have had regard to the Strategy section of the draft Plan and would advise that the comments as set out below and throughout this report set out the clear concerns the local community has with the strategy as currently presented by the GMCA, and its

ability to meet the plan objectives and meet the needs of the community. The Plan as drafted is in parts inconsistent with the strategy and plan objectives, and this needs to be addressed in order for the Plan to be found sound and effective.

Draft Policies

- 6.50 We wish to address a number of draft strategic policies as detailed below (the full wording of each policy referred to has been included at Appendix 4).
- 6.51 **Policy JP-Strat 1 – Core Growth Area:** Our client, the SGMGB Action Group, support the provisions and principles of the above policy in relation to siting employment and housing needs in sustainable locations if it was seen to be being reflected within the sites being proposed for development. However, the PfE Plan as drafted proposes a number of sites in unsustainable locations, with poor access to local transport, at risk from flooding and with no inter-connectivity between homes and employment opportunities. Given the change in the character of our High Streets we would ask that the GMCA go back and review the development potential of these major centres for mixed use employment and residential schemes, as well as other urban locations which are well located for transport and service access, and which can assist in removing the need to develop within the Green Belt. This will also ensure a sound plan which is consistent, coherent, and justified.
- 6.52 **Draft Policy JP-Strat 2 – City Centre:** We welcome and support the focus on the development within the city centre and the newly proposed increase in the number of homes within this area from that proposed within the GMSF 2020. However, (1) the plan period has been incorrectly stated within the policy, which is clearly just a typing error which has not been corrected from the earlier draft and (2) the focus on not displacing the area's non-residential function whilst understood, does not appear to reflect current lifestyle and behavior changes with more people shopping online. This change in character will have an impact on the scale of employment and housing schemes which can now come forward within the city centre and should be being further promoted given the sustainable credentials of the main urban area. We therefore ask that in order to ensure an effective and positively prepared Plan, that the GMCA revisit the ability to develop within the core urban locations.
- 6.53 **Draft policy JP-Strat 5 – Inner Areas:** Once again it is noted that the plan period is incorrectly detailed within the policy. Furthermore, whilst the wording of the policy appears to support using development to regenerate and reduce deprivation within the inner areas, the fact that significant levels of growth will take place within the outer areas, and insufficient consideration has been given to the development of brownfield sites, and increased densities within the main urban areas, the Plan would appear to be somewhat incoherent and inconsistent. The Plan sets out a clear approach to focus development within the urban area and on brownfield sites, however, there remains a significant area of Green Belt release being proposed, and we are of the view that as drafted such an approach has not been sufficiently justified, nor does it secure a coherent and sound plan which is consistent with national guidance. As set out within the Inspectors Report associated with joint plan in Bath and Somerset it is essential that sites proposed for allocation are robustly justified, and alternatives correctly

examined. We therefore ask that the GMCA re-assess the potential for reasonable alternatives and delete sites proposed for allocation within the Green Belt.

- 6.54 **Draft Policy JP-Strat 6- Northern Areas:** We would draw attention to a simple typographical error in relation to the wording of policies GM-Strat-7 and GM-Strat-8, which should now read JP-Strat-7 and JP-Strat-8. Furthermore, the policy would appear to be inconsistent in its approach by prioritising the re-use of brownfield land, but also setting out the release of Green Belt land. Clarity is therefore sought that the sites being prioritised for regeneration are being effectively and efficiently developed, that all brownfield sites within the urban area have been reviewed and proposed for development in advance of Green Belt sites and how the Green Belt sites proposed for release can be found to be key locations. Without a clear demonstration of the same, the proposals within the policy to support the northern authorities is simply a statement with no clear action on how these areas will be regenerated, which simply cannot be achieved if large tracts of derelict and brownfield land are not brought forward for development.
- 6.55 The proposal to *'seek to identify opportunities to protect and enhance the natural and historic environments to improve the local character'* on sites being released from the Green Belt do not in our opinion go far enough, and the policy should be duly amended to set out how such improvements will be achieved, and the nature and scale of mitigation and protection developments will be required to deliver. As drafted, the policy is too ambiguous to provide residents with the certainty they require that developers will be required to protect the local environment and much cherished historic environments, and to what extent this would be achieved.
- 6.56 **Draft Policy JP-Strat 7 – North-East Growth Corridor:** In addition to the correction required to the plan period referred to within the policy (and further addressed at Draft Policy JP-J 1), residents are concerned that the northeast corridor is being asked to accommodate an unsuitable, unsustainable and unreasonable level of development over the plan period. The scale of development being proposed will wholly alter the character of the local area and have direct impact on local communities in terms of integration, access to services, facilities traffic congestion etc. The strategic sites have been assessed in more detailed at Section 7, but in all reality require the loss and removal of extensive tracts of Green Belt land and will result in coalescence of settlements to the detrimental of the local area.
- 6.57 Oldham and Rochdale already account for around a quarter of warehousing in Greater Manchester. The North-East Growth Corridor may have unforeseen consequences leading to an over-supply of fulfilment warehousing in a small geographic area; a scenario may be envisaged where the three boroughs (Oldham, Bury and Rochdale) are effectively competing for the same business. This would greatly reduce the competitive effectiveness of the Northern Gateway and Stakehill. It seems that this is being dictated not by actual need in the North of Greater Manchester, but by the desire to outsource the demographic/geographic problems of the boroughs in the South of Greater Manchester. As such Oldham and especially Rochdale would be tying themselves to the economic needs of the southern boroughs.

- 6.58 It is also unclear whether the site at High Crompton will be delivering development over and above that set out within the policy, and how reference can be made to this site if it is not proposed for release at this stage. PfE as drafted would appear to indicate that the site will be released from the Green Belt within the Oldham Local Plan, regardless of the fact it is not addressed in detail within the regional plan. The lack of clarity as to what would constitute it being necessary for release is also of concern. In reality on the basis of the information currently available, the land should be retained within the Green Belt.
- 6.59 As drafted the policy is unduly ambiguous and weighs unreasonably in favour of land release and not land protection. The policy is therefore deemed to be unsound as it has not been sufficiently justified. To address the test of soundness we would suggest that draft policy JP-Strat 7 be deleted, alongside Draft Allocations JPA1.1 and JPA 2. Further, that Draft Allocation JPA 1.2 be reviewed.
- 6.60 **Draft Policy JP-Strat 8 – Wigan-Bolton Growth Corridor:** Once again attention is drawn. To the plan period reference, and it remains of concern that the GMCA are proposing to release land from the Green Belt in order to support the success of a growth corridor, as opposed to simply representing good and justified planning. In our view such a stance would not meet the tests required to demonstrate exceptional circumstances, nor is this an approach supported within the NPPF. We would therefore ask that the GMCA carefully consider the proposed allocation and in reality, to focus once again on sites within the urban area which are better placed to meet housing and employment needs.
- 6.61 **Draft Policy JP-Strat 9 – Southern Areas:** Draft Policy JP-Strat-9 is noted to fail to make clear commitments in relation to the level of new development proposed within this area. Given the focus on improved transport links, connectivity, and a focus on enhancing access to employment, the GMCA should set out within the policy the proposed level of housing within this location. The reference to selective release of Green Belt land does not provide certainty and clarity to residents as to how sites have been assessed and identified, nor how such release then corresponds with the focus on prioritising the re-use of brownfield land. As it stands the policy is ineffective and unjustified and is therefore unsound.
- 6.62 We support the importance of promoting the role of town centres, and in fact would go further and set out how such key locations could support overall levels of growth and delivery, given their sustainable nature. We also believe that such an approach should be being put forward across the board, and not simply in relation to this part of Greater Manchester. This would demonstrate a more cohesive and consistent approach to site identification and would demonstrate and support the commitment of the GMCA to the delivery of brownfield sites and the protection of the Green Belt.
- 6.63 **Draft Policy JP-Strat 10 – Manchester Airport:** Once again there are concerns with the extent of Green Belt release being proposed within the plan, and whether this has been suitably justified. Further, that the sites identified for development are suitable and sustainable. For these reasons the draft policy is deemed to be ineffective and fails to adhere to national policy and should therefore be deleted.

- 6.64 **Draft Policy JP-Strat 11 – New Carrington:** It is noted that GMCA are proposing a further large-scale allocation at New Carrington, which will, like many others proposed alter the character of the locality. We recognise that the GMCA are proposing major investment in active travel, public transport, and highway infrastructure, such as the Carrington Relief Road, improvements to Junction 8 of the M60 and public transport corridors to support the development, however it is noted that such investments are required to ensure the development is well connected with the rest of Greater Manchester. This supports our view that allocations, and large-scale ones at that, are being sought to be brought forward for development in unsustainable and unsuitable locations. The wording of the policy also heightens residents' concerns in relation to the likely traffic, noise pollution and air pollution resultant from a development of this scale. It is therefore the view of SGMGB that the proposed policy and supporting allocation are insufficiently justified and fail to be consistent with national planning policy. The policy and allocation are both therefore deemed to be unsound and should be deleted from the Plan.
- 6.65 **Draft Policy JP-Strat 12 – Main Town Centres:** Draft Policy JP-Strat 12 appears to set out clear support for increasing the provision of new homes within main urban areas which is clearly supported for the reasons set out throughout this submission. However, the policy as drafted does not set out a numerical commitment to the extent and nature of residential provision within town centres, nor the ability to promote growth and development given changing shopping habits and the enhanced access to public transport and facilities. As made clear previously, it is imperative that the changing environment of the High Street and the benefits this could foster in relation to employment and housing development is fully garnered within the Plan, and as such further work is required to examine and assess town centre locations and to draft suitable policies which support development within these sustainable locations.
- 6.66 **Draft Policy JP-Strat 13 – Strategic Green Infrastructure:** Given the importance placed on the protection of the Green Belt both within the Plan and the NPPF, and its value to the residents of Greater Manchester, it would unreasonable and unsound for the protection of such land allocations and assets not to be reflected within the above draft policy. The same could also be said in relation to other urban greenspaces, and countryside locations. Whilst elements of these spaces may well be addressed elsewhere within the Plan, to secure consistency, coherency, and clarity that these important spaces are valued their protection needs to be included within draft Policy JP-Strat13. The policy needs to be duly amended to sate a clear commitment to the protection and promotion of green infrastructure.
- 6.67 **Draft Policy JP-S 1 – Sustainable Development:** The provisions of draft policy JP-S1 are wholly supported. Our concern however is that the requirements and principles laid out within the policy are not being reflected within the approach to land release and allocating sites. The issue of viability justifying additional Green Belt release is not defensible and more needs to be done to maximise and accelerate the discussions with Government on securing funding to assist in the delivery and redevelopment of brownfield sites. Until more clarity can be provided on the funding that can be achieved, and the impact this may have on regenerating vacant and derelict sites, there should

be no proposed release of land from the Green Belt. We therefore simply request that the Plan as drafted be duly amended throughout to ensure a consistent and justified focus on brownfield and previously sites, and the ongoing protection of the Green Belt. Further that a new Spatial Option be brought forward as a 'reasonable alternative'. This new Spatial Option will prioritise the key objectives of the Climate Action Plans of the nine member districts of PfE, over economic, social and housing objectives.

- 6.68 Policy JP-S 1 states that “to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously”. In reality the environment seems to have been a secondary consideration throughout all permutations of the plan. The Growth and Spatial Options prioritised economic and population growth and the environmental consequences were always something that needed to be “mitigated”. All the compromises have come at the expense of the environment and continue to do so.
- 6.69 Since the Regulation 18 consultation in 2019, all nine district members of PfE have declared climate emergencies and are required to bring forward and implement a Climate Action Plan. Given the increasing international gravity of the climate crisis, it will in all likelihood become the most dominant political issue of our lifetimes, and some major economic and demographic concessions are likely going to have to be made over the next couple of decades in our collective effort to combat its causes and mitigate its effects. A report by Shelley Phelps for the BBC (<https://www.bbc.co.uk/news/science-environment-58102578>) recently found that a third of councils had policies incompatible with their climate goals. In this context it is difficult to argue against the merit of including a Spatial Option that prioritises the core objectives of each council’s climate action plan, where the compromises come on the economic and housing side, with the priority clearly weighted on environmental matters.
- 6.70 It is likely some of the objectives and policies advocated by the action plans will become mandatory over the next few years as we get to grips with climate change, so it will be useful to try and understand their impact now and to draft and implement robust planning policies which seek to set out clear targets for reductions in climate change and clear commitments to environmental enhancement. It may well be the case that the Plan that is best placed to respond to climate change will also be the most resilient over the next couple of decades as climate change escalates.
- 6.71 **Draft policy JP-S 2 – Carbon and Energy:** The principles of Draft Policy JP-S2 are supported, and we welcome the GMCA’s commitment to the protection of the environment. However, in order to achieve these targets and demonstrate that climate and environment protection is an objective and not an aspiration, we would ask that careful consideration be given to the reassessment of all previously developed land and the protection of vital greenspaces across Greater Manchester, including the Green Belt, which offer significant ecological and environmental value, and once lost simply cannot be replaced.

- 6.72 In that regard we ask that the Plan be re-evaluated in light of the issue of climate change and the environment (attention is drawn to the current Lancaster Local Plan Review which is wholly focussed on this issue), and sites within the Green Belt, unsustainable locations and at risk from flooding are deleted from the Plan. Further, that the Plan sets out a clear objective of developing brownfield sites in urban and sustainable locations and to protect the Green Belt from release. By leading the way on environmental commitments, the GMCA has the potential to set a benchmark for evolving planning policy, and to create an effective and positively prepared Plan which meets the current needs of Greater Manchester, whilst protecting and respecting the needs of future residents to live in a green and health city region.
- 6.73 **Draft Policy JP-S 4 – Resilience:** Once again the basis and principles of draft Policy JP-S4 are supported and welcomed, however, the PfE as drafted fails to adhere to its requirements. There are a significant number of sites proposed for allocation which simply cannot meet the tests of resilience, including in relation to flood risk and other environmental considerations. A number of sites are poorly located and will in reality have detrimental impacts on the communities within which they are proposed to be situated. The PfE therefore simply cannot be found sound when the principles of one of the key policies are not being met with the proposed allocations, these issues are addressed in more detail at Section 7.
- 6.74 Concern must also be raised in relation to point 10 which is noted to have been amended from the GMSF2020 draft. The Policy indicates a contribution towards the provision of affordable housing. Currently there are 70,000 people on housing waiting lists across Greater Manchester. The plan “aspires” to deliver 50,000 affordable homes but the final figure delivered could be significantly less. This is simply unacceptable. In a post covid economy and with housing affordability more of an issue than ever before, it is vital that housing is provided to meet the current and future needs of the community, with affordable provision being a key consideration, given the high house price values in many of the nine boroughs. PfE should be drafted so as to ensure the delivery of the 50,000 units, and not just a contribution, as the level of contribution could be significantly less than the identified need, meaning the Plan will fail to meet the needs of the local community. In order to meet the tests of soundness we ask that the policy framework be duly amended to address these concerns.
- 6.75 **Policy JP-S 5- Flood Risk and the Water Environment:** As set out within the site assessments at section 7 and the assessment of the evidence within Section 5, there are serious concerns in relation to the proposed release of Green Belt land and allocation of development sites generally within areas at risk from flooding. This is wholly unacceptable and cannot be justified on the basis of the evidence as currently put forward. It has been a clear planning principle for some time to avoid development within and on land at risk from flooding, and to be proposing large tracts of development in such areas would appear dangerous and ill-considered. The PfE Plan needs to be revisited to ensure that all development being proposed to be brought forward is located within areas at no to lower risk from flooding, and to be able to demonstrate to the Examination that any such sites being proposed can be suitably mitigated and safely accessed and egressed without creating flooding elsewhere.

Without such measures in place these sites should simply be deleted from the PfE Plan.

- 6.76 **Draft policy JP-S 6 – Clean Air:** Given the extensive levels of development being proposed within the Plan area, and particularly within the outer areas, our client (SGMGB Action Group) have particular concern in relation to the likely impact on air quality and health as a result of increased traffic and general activity. The evidence base as drafted does not address their concerns sufficiently to provide the comfort they are seeking that their lives, health, and amenity will not be detrimentally affected by the nature and scale of development being proposed within the draft Plan. The evidence base should include additional assessment of the impact of proposed development levels on air quality and be used to support a policy which sets out clear commitments to the reduction of air pollution, and how developments are required to ensure the health of existing local communities.
- 6.77 **Draft policy JP-J 2 – Employment Sites and Premises:** It is noted within draft policy JP-J2 that the GMCA propose to release land from the Green Belt in order to provide the quality of well-connected employment land supply necessary to deliver the required scale of long-term economic growth. This statement raises two key questions, namely:
- (1) As a result of the increased provision of working from home, and the likelihood of such an approach becoming a more normal feature of the work environment, is there still sufficient demand for the level of employment land being proposed within the Plan, particularly of a sufficient scale to justify the release of Green Belt land? and
 - (2) What additional consideration has been paid in relation to securing the provision of employment uses within town centre locations given lifestyle changes and the increased levels of online shopping?
- 6.78 It would appear as though the GMCA have made the decision to secure significant areas of employment land without adequately assessing the alternatives. In our view the level of demand for office accommodation in particular will be directly affected by the change in work patterns. The changes being seen in our High Street offers an ideal situation to increase employment opportunities for non-retail uses in locations which are the most accessible and sustainable. This could facilitate a significant reduction in the land being development on the edge of urban areas and could remove the need to release land from the Green Belt.
- 6.79 Warehousing comprises a disproportionate share of Oldham's and Rochdale's economies, accounting for around a quarter of all the warehousing space in Greater Manchester. The North-East Growth Corridor would further exacerbate this problem. The old mill towns such as Oldham and Rochdale have been the hardest hit by de-industrialisation; warehousing and distribution have filled the gap and been effective at reconfiguring the mills as distribution centres. For this reason, storage and distribution have been embraced politically. However, what has provided a convenient short-term political quick-fix is in danger of becoming long-term economic folly.

- 6.80 Firstly, storage and distribution are low-density employment i.e. it is not an efficient use of employment space. This type of employment is also typically low skilled and low paid. This will stifle economic growth rather than accelerate it because it imposes a ceiling on productivity. For example, for a warehouse operator, the GDP per capita for grocery storage is more or less hard-capped. This cap essentially does not exist for a tech start-up, and in the case of R&D and green technology it is far less imposing. There is a perception amongst residents that the less productive industries are being forced into the north of the conurbation to free up premium employment space in the south. The key to boosting northern competitiveness is to diversify industry and increase opportunity across the region.
- 6.81 Secondly, storage and distribution are extremely vulnerable to automation. In its employment land projections, PfE bases its projections on the assumption that the employment density of I&W will not change, but this is unrealistic. The North-East Growth Corridor just forecasts more unemployment into Oldham's and Rochdale's economic futures. The SGMGB therefore consider that the policy as drafted is unsound as it has not been positively prepared and once again has not been sufficiently justified. We therefore ask that the draft policy be modified to prohibit warehousing and distribution premises on the following draft allocations (which we have already requested to be deleted from the Plan):
- JPA 1.1 (Heywood/Pilsworth)
 - JPA 2 (Stakehill)
- 6.82 **Draft policy JP-J 3 – Office Development:** The focus on office uses within urban areas is understandably supported, given the overall position set out within these representations. We also welcome the recognition of the role that town centres can play in meeting office accommodation needs over the plan period.
- 6.83 We also appreciate the basis and justification for the potential for the individual boroughs to limit the freedom to change current office provision to residential under the prior approval process. However, it is also important to ensure that the Plan is flexible and justified and would suggest that the wording of policy JP-J3 be amended to ensure that the use of article 4 directions is not unreasonably imposed and that the local plans does provide sufficient flexibility to allow residential uses within town centres where appropriate and justified. Otherwise, there is a risk that such an approach could limit development opportunities and simply result in new buildings remaining vacant and under-used in the future.
- 6.84 **Draft Policy JP-J4 – Industry and Warehousing Development:** In order for developments to meet the tests laid out within draft policy JP-J4, it is imperative for them to be well located for access to sustainable modes of transport. In reality this can only be achieved within the main urban areas and not by the release of Green Belt land in rural areas, or areas currently not well served by public transport links and good road access for large vehicles. The GMCA therefore need to revisit their proposed employment land allocations to ensure they meet with their own draft policies and development vision, in circumstances where there are questions on the suitability and

sustainability of a number of the current proposed locations. Failure to ensure the proposed allocations meet with the requirements of draft policies would raise significant issues in relation to consistency and coherence and could render the Plan unsound.

- 6.85 Over the plan period 3,960,389 sqm industrial and warehouse floor space will be provided. This is essentially the same amount of floor space as the 2020 draft of the Greater Manchester Spatial Framework (4,185,793 sqm), but with Stockport and the 2020–2021 completions removed. There is also a 5,000 sqm reduction at Stakehill, but apart from that the quantities of floor space appear to be identical to the 2020 draft. The crucial difference between PfE and previous drafts of the GMSF is that PfE has switched to a “past completions” model. This has resulted in a crucial policy change: the industrial land target for the duration of the plan has dropped from 4,100,000 sqm to 3,330,000 sqm. It could be suggested that the PfE is fundamentally different in terms of employment than proposed within the GMSF and so this should be a Reg 18 and not a Reg 19 consultation.
- 6.86 However, the reduction in industrial land need has not been accompanied by a reduction in supply: a land supply of 3,960,389 sqm (which includes 2,154,880 sqm of allocations) equates to a 56% buffer in total. Earlier reports included in the GMSF documentation noted that a “supply margin of 50% falls well outside the bounds of what has been generally used elsewhere” (“Note on Employment Land Needs for Greater Manchester”, Nicol Economics, February 2020, p. 28). Nicol Economics further notes that supply margins are “up to around 25% or at most 5 years of supply”. Taken in conjunction with the policy, the allocations are not compliant with NPPF paragraph 140 (Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...). It is the view of the SGMGB that the policy as drafted is not compliant with national policy and does not therefore pass the tests of soundness. The policy should therefore be amended to remove any proposed allocations from the Green Belt, and to refocus employment uses within the main urban areas.
- 6.87 **Draft Policy JP-H1 – Scale, Distribution and Phasing of New Housing Development:** The policy as drafted appears to indicate the need to deliver 164,880 new dwellings over the Plan period. On the basis of that figure, we do not believe that there is a justifiable case to be made for the release of Green Belt land (i.e. there are no exceptional circumstances) to meet the needs of Greater Manchester over the Plan period, particularly in light of section 13, paragraph 141 of the National Planning Policy Framework, and when assessing the reasonable alternatives as laid out elsewhere in this report. The plan as drafted is therefore deemed to be unsound and needs to be duly modified to secure the removal of all sites proposed for allocation which are currently designated as falling within the Green Belt, and additional land made available within the main urban areas and on previously developed land.
- 6.88 Attention is drawn to paragraph 7.12 of the draft Plan which reads as follows:

“Table 7.1 illustrates that, in numerical terms, the existing supply of potential housing sites identified in the districts’ strategic housing land availability assessments and small sites is adequate to meet the overall identified need.

However, meeting the numerical needs alone, is not enough. We must be able to demonstrate that its land supply has sufficient flexibility within it to demonstrate that it represents a deliverable, viable and robust land supply and will deliver a balanced and inclusive growth, thereby achieving the overall spatial strategy. In light of this and the need to ensure the Green Belt boundary can endure beyond the plan period it has been necessary to identify additional new sites across the city-region, over and above those in the existing land supply. Having considered a number of spatial options, it has been concluded that it in order to achieve this, it has been necessary to remove some land from the Green Belt and to allocate this land within this Plan for residential development.”

- 6.89 Paragraph 7.12 makes it clear that the nine boroughs have sufficient sites to meet the identified housing needs, with 135,140 units to be sourced from brownfield land. In our view the level of existing land supply does not justify the proposed release of Green Belt to meet needs, and in fact cannot be used as part of the case for exceptional circumstances, as alternatives including a more detailed assessment of the impact of the pandemic on behaviours and general development needs, and the potential for more effective and efficient use of previously developed land can be delivered.
- 6.90 It is noted that table 7.2 sets out a potential programme of housing delivery. However, as we all know the tabulation is merely an exercise to show how development needs could be spread out over the plan period. However, once adopted any of the allocated sites could well be brought forward for development at any time, and it is clear that those easier to develop sites on greenfield locations and within the Green Belt will come forward in advance of those previously developed and brownfield sites, which require remediation and additional cost. Simply relying on future local plan reviews to correct any under or over provision does not address the fundamental concerns raised within this representation on overall levels and locations of delivery, and the concerns raised by the local community within their own submissions. It is the view of the SGMGB that the sites being brought forward for release from the Green Belt are in fact being delivered to serve the issue of a housing buffer, or flexible delivery within the Plan. However, Green Belt sites can now only be brought forward for delivery and allocations once all other reasonable alternatives have been explored, and for the reasons laid out throughout these representations this test (as set out at section 13, paragraph 141 of the National Planning Policy Framework) has simply not been met.
- 6.91 When the GMSF went out to a Regulation 18 consultation in 2019 its key message was that the two cities would absorb housing need using high density formations from the surrounding boroughs and limit Green Belt loss. While many people opposed the housing allocations in the Green Belt, many were supportive of the general approach of using a city region masterplan to minimise the loss of green space. Indeed, many of the groups campaigning against the Plan favoured remaining in the Plan on this basis. Stockport’s withdrawal notwithstanding, the GMCA and the councils have concluded that the PfE has substantially the same effect as the GMSF, and it is on this basis that PfE has dispensed with a further Regulation 18 consultation and progressed to a Regulation 19 consultation.

- 6.92 However, it is not as straightforward as this. As well as Stockport withdrawing, the City of Manchester's housing target was subject to a 35 percent uplift. Even after taking Stockport's withdrawal into account, this means that the City of Manchester is no longer absorbing housing need for the boroughs. In fact, the uplift has inverted this principle: the 2019 draft of the GMSF saw the City of Manchester absorb housing need and included a 9 percent buffer on the overall land supply. In PfE the City of Manchester no longer absorbs housing need and there is now a 15 percent buffer on the overall supply. This buffer is provided mostly by the boroughs: the buffer on the land supply for the City of Manchester stands at just 5 percent, whereas it collectively stands at over 20 percent for the other districts.
- 6.93 So in 2019 the residents of Greater Manchester were consulted on the basis that the two cities would absorb housing need, and this would reduce the loss of Green Belt. In PfE, Salford and the seven boroughs are now propping up the buffer for Greater Manchester through allocations on their Green Belt, which is wholly unacceptable to the residents within these communities. If the City of Manchester were dropped from PfE, the allocations on the Green Belt could be reduced by thousands of homes by bringing the buffer down to the standard 10–15 percent range. In terms of Green Belt, PfE now has the exact opposite stated effect to the 2019 draft of the GMSF. Many people who supported a joint plan because it would save Green Belt, would realistically now oppose it on the same grounds. PfE not only has a substantially different stated effect to the GMSF, in reality it now has the opposite effect. The policy as drafted is therefore not deemed to be legally compliant, and not sufficiently justified or consistent and does not therefore pass the test of soundness. The draft policy should therefore be amended to secure an uplift on housing provision within the City of Manchester to promote the provision of previously developed land and prevent encroachment onto the Green Belt.
- 6.94 **Draft policy JP-H2 – Affordability of New Housing:** For the reasons laid out at above we firmly believe that as draft policy JP-H2 is not fit for purpose and offers no serious requirement for the affordable housing needs of the nine boroughs to be met. This is wholly unacceptable and cannot be justified, nor will it be effective, and as such the Plan is likely to be found to be unsound. Clarification is also sought that the land supply tabulation set out in table 7.3 remains correct in review of the change in the Plan period.
- 6.95 In relation to the issue of housing affordability, and the level of affordable housing being proposed, attention is drawn to paragraph 7.23 of the draft Plan which states:
- “There are around 72,000 households on the local authority registers, with over 26,000 of these identified as being in reasonable preference for housing. (79) It is estimated that around 38% of newly forming households are unable to afford to buy or rent a home at lower quartile prices. (80) New build is just one of the ways to meet this need.”*
- 6.96 Given that the level of need is some 22,000 higher than what is being proposed within the Plan we have significant concerns with the policies referred to above and the overall approach to housing delivery set out within. There is a clear of commitment on

levels of provision, however a mere statement on contributions to the levels of delivery. In order to secure the future of the Greater Manchester area, it is imperative that young families and persons who wish to remain within the local area can afford to purchase homes close to their existing families and communities. The Plan should therefore be offering those residents in need more comfort and certainty that their voices and needs are being heard, and that they will be supported to find decent homes in their local area, and not simply the potential for a limited contribution which may not meet their requirements.

- 6.97 It is noted that each authority will set their own affordable housing threshold for applications. In our view this is the incorrect approach if you are proposing a regional plan and wish to spread growth, investment and development fairly and equally across all nine boroughs. In our view there should be a consistent approach to the level and requirements of affordable housing across the Plan area, otherwise there is a danger that one authority could become more attractive for development impacting on wider delivery. We therefore ask that the policy be duly amended to send a standardised affordable housing target from new developments across the Plan area and to support the case that the Plan is sound.
- 6.98 **Draft Policy JP-H4 – Density of new Housing:** In order to limit the need for Green Belt release we suggest that the tabulation and overall proposal for 35 dwellings per hectare be revisited, particularly for brownfield sites in sustainable locations, in order to ensure that existing land available for development is being used as effectively and efficiently as possible. It is accepted that the policy goes on to differentiate between house types and density levels, but our clients are keen to ensure that the GMCA are doing all they can to promote and maximise the benefits to be achieved from development of land within urban areas, in order to protect the key natural asset of the Green Belt.
- 6.99 It is the view of SGMGB that ambiguous definitions in Policy JP-H 4 and outdated brownfield registers make it difficult to determine whether a site satisfies the criteria of the minimum density specification, and if the prescribed minimum density will be delivered. However, assessment of a sample of sites in Oldham, Rochdale and Tameside (that in our client's judgement satisfy the criteria) suggests that the minimum density specification is not being delivered, especially outside of the main town centres. If so, then Policy JP-H 4 is not deliverable by PfE.
- 6.100 If this is the case then the strategic objectives of the plan are compromised. If PfE is not efficient in its use of existing land resources, especially those that directly support the spatial strategy, then that will lead to it failing to fully capitalize on economic assets and its sustainable transport infrastructure. If the Plan is not able to demonstrate the deliverability of Policy JP-H 4 then this also means it is not compliant with NPPF para. 141 (Before concluding that exceptional circumstances exist...), nor is the draft policy deemed to be effective. The policy as drafted is therefore deemed to be unsound.
- 6.101 The SGMGB therefore request the following modifications;

- Policy JP-H 4 should provide precise definitions for city centres, town centres, large designated centres and other designated centres. All the centres that these definitions apply to should be clearly identified i.e. all town centres should be listed, all designated centres etc.
- In addition to identifying the proposed density at the site, the SHLAAs should also clearly indicate if the site meets the criteria for the minimum density specification and state the prescribed minimum density, regardless of whether it will deliver the density.
- The plan should clearly state the average density projected in the SHLAAs for each density categorization in the specification, for each of the nine districts.
- The plan should clearly state how many of the sites are projected by the SHLAAs to deliver the prescribed density, and how many will not, for each density categorization in the specification, for each of the nine districts.
- All brownfield registers should be brought up to date.

6.102 We request that no Green Belt allocated for housing should be released until the plan demonstrates the deliverability of its minimum density specification.

6.103 **Draft Policy JP-G10 – The Greater Manchester Green Belt:** As laid out throughout this consultation response the SGMGB have several concerns with the PfE Plan as drafted, but their overriding concern is with the proposed loss of Green Belt as a matter of principle. It is accepted that there has been an overall reduction in the level of Green Belt proposed for development from earlier drafts of the Plan, however our clients still consider the scale proposed to be unacceptable and unjustified to demonstrate exceptional circumstances. It is our view, and that of our client that additional work is required to be undertaken in relation to the assessment of alternatives and a clear demonstration that all has been done to evaluate the development potential within urban areas, taking account of realistic levels of development demand, development need and the impact of changing lifestyles and on the character of the High street, the need for employment allocations and general activities and land availability within the urban area.

6.104 As it stands it is our view that the case for exceptional circumstances to release land from the Green Belt has not been robustly made, and the evidence base as drafted is not fit for purpose. We therefore consider the plan to be unsound and in need of significant amendment, including the deletion of proposed development allocations within the Green Belt, before the tests of soundness can be seen to have been met.

6.105 In evaluating the comment made above we would advise that the Green Belt of Greater Manchester functions at three levels: it operates at the city region level, (preventing Greater Manchester from merging with other counties), at the city and borough level (preventing districts from merging into each other) and the town level (preventing the smaller towns and villages that make up the boroughs from merging into each other).

6.106 PfE appears to assign far less importance to the Green Belt that separates the boroughs and towns within, than to the Green Belt which encases Greater Manchester. PfE not only treats the internal Green Belt with a reckless disregard in many cases,

but in some instances merging neighbouring boroughs and towns looks to be a design feature e.g. one of the main aspects of the Northern Gateway seems to be the joining of Bury and Rochdale, which runs completely against the original principles of allocating land within the Green Belt.

- 6.107 This will be counter-intuitive for many residents who do not perceive their identity in city-region terms. PfE is an assault on the character of small towns and local identities. At a fundamental level the proposed re-designation of the Green Belt boundaries will change Greater Manchester into something most respondents to the 2019 consultation overwhelmingly rejected. It is therefore the view of SGMGB that the policy as drafted is not effective and nor is it consistent with national policy. The policy as drafted is therefore deemed to be unsound.
- 6.108 In terms of modifications to the Plan to address the tests of soundness, it is imperative that a thorough, consistent and coherent re-evaluation takes place of all proposed Green Belt allocations, alongside a more detailed assessment of land within built up areas in line within section 13, paragraph 141 of the National Planning Policy Framework. It is the view of the SGMGB that there is more than sufficient land available within the region, within cities, towns and villages to meet the needs of Greater Manchester over the plan period, and as such all allocations proposed beyond defined settlement boundaries and those within the Green Belt should be deleted from the Plan, with development reallocated within the urban areas.

Section 7 - Strategic Allocations

Cross Boundary Allocations

- 7.1 Whilst the Plan proposes a number of areas and land parcels for development over the plan period, this report is to draw specific attention to the cross boundary strategic allocations. These are addressed in summary below and within more detail within the various site assessments included at appendix 5. For ease however we can confirm that there are serious concerns in relation to the suitability and delivery of the sites as detailed below.
- 7.2 **Policy JPA1.1 - Heywood and Pilsworth (Northern Gateway):** Heywood and Pilsworth (Northern Gateway) represents a huge incursion into the Green Belt and a gross scale of development which will have significant detrimental impact on the local community, ecological networks, the environment and the road network. The wording of the above policy accepts that the site is poorly located for access to public transport networks, and in reality, is also poorly related for access to key local services and facilities. The development will place a significant burden on the local transport network and regardless of junction improvements with the M66/M62 will worsen an already congested and busy stretch of the Manchester Motorway Ring Road to the danger of highway users. It is noted from paragraph 11.25 that the local authorities will continue to explore opportunities for a new junction at Birch, however this should have been addressed within any earlier applications on site, and if not within the proposed allocation, as without a clear demonstration that the scale of development can be safely and suitably accommodated within the existing road network, or with viable and agreed highway improvements, the reality is that the site should not be being supported for development and should be deleted from the Plan.
- 7.3 Whilst the allocation includes an element of on-site education provision it is accepted that there will be financial contributions for off site places. However, in reality these are unlikely to be sufficient to fully address the impact of this scale of development on the local education service and could well be reduced through negotiations as part of any legal agreement in relation to viability etc, particularly when factoring in the potential cost of a cycle/pedestrian footway over the M62. The Plan and policy do not give assurances to the public about the siting and form of development, it is simply a numerical proposal with the masterplan proposals to be approved at a later date (although it is noted that the Plan makes reference to the fact that planning permission has already been granted on the site).
- 7.4 The site is currently greenfield with some extensive areas of vegetation which will be lost as a result of the development. The loss generally of such a large area of greenfield will have detrimental impact on biodiversity and wider ecological networks, which in all reality will not be compensated for or mitigated to a degree which can override the loss. The allocation could result in the loss of an existing golf course, and clarification is sought that this has the support of Sport England and that the facility is no longer required to meet the needs of the community.

- 7.5 There is noted to be a brook running through part of the site and there are therefore legitimate concerns in relation to flood risk and specifically surface water flood risk once the development is completed and the impact on the wider local area.
- 7.6 When viewing the proposed allocation, with land adjacent also being proposed to be brought forward, it will result in the coalescence of two large urban areas and the total loss of a strategic gap to maintain separation. This is wholly unacceptable and flies in the face of the reasoning behind allocating land as Green Belt in the first place.
- 7.7 The site's location adjacent to a major motorway junction also raises concern regarding the impact of developing the site on the amenity of future residents both in terms of noise, but also air quality and health. Whilst reference is made at paragraph 11.34 to potential mitigation, there is no clarity at this stage as to what that could constitute and given the well publicised impact of poor air quality on health and respiratory issues, and the impact of detrimental levels of noise on mental health and well-being, these issues simply cannot be ignored.
- 7.8 Paragraph 11.35 makes reference to the existing grade II listed buildings within the allocation boundary, as well as to significant archeological sites including meadow Croft Fold, as well as numerous other designated heritage assets within the local area. Whilst the plan proposes that the impact of development on these assets be addressed at application stage within a Heritage Impact Assessment, it is our view that the impact on the setting and character of such important structures and features needs to be addressed prior to allocation in order to protect the assets for future generations.
- 7.9 **JPA1.2 - Simister/Bowlee (Northern Gateway):** Once again the Simister and Bowlee (Northern Gateway) Allocation represents a significant development which will have grossly detrimental impacts on local residents, the local highway network, ecological networks and local services. When you factor both parts of the Northern Gateway together, it is clear that the impact of this scale of development will be worse than significant. It is the view of our clients that both allocations individually and cumulatively are unacceptable and represent the wrong development, at the wrong scale in the wrong place. The SGMGB therefore request that the proposed allocation be deleted from the Plan.
- 7.10 It is noted that the Plan proposes that the allocation will deliver around 1,550 homes, with some other improvements in the local highway network and public transport provision, although the clarity on what this may entail is clearly lacking at this stage. The Policy also requires the provision of cycle routes, affordable housing and a two form entry primary school, as well as a financial contribution to off-site secondary school provisions. Other requirements include investment in infrastructure and utilities and a new local centre in an accessible location to include a range of retail, health and community facilities. Clearly the other benefits to be achieved from the allocation have been set out and are supported, however the scale of those benefits and the ability for a developer to negotiate out of these requirements as part of any section 106 discussions and section 278 negotiations is of significant concern, in circumstances where should these be demonstrated to make the scheme unviable and removed from

the development, the impact of this scale of development on this location will only be exacerbated.

- 7.11 The concerns on technical issues including flood risk, surface water run-off, ecology, biodiversity and the highway network set out in relation to the Heywood and Pilsworth allocation apply in equal measure to this further allocation. Whilst the wording of the above policy seeks to address some of those, in reality all it is doing is pushing the issue back to be addressed at application stage once the principle of development has been established within the Plan. However, without clear demonstration on matters including highway impact, ecological issues and flood risk at this stage we would argue that this proposed allocation cannot be found to be sound and should in fact be deleted from the Plan.
- 7.12 We are not aware of any heritage assets being located within the allocation boundary, however as set out at paragraph 11.35 above we are aware of various heritage assets being located within the wider local area and would ask that greater regard be paid to the impact of the scale and form of development on their setting, character and long-term future as a result of these development proposals.
- 7.13 Paragraph 11.39 accepts that this is a semirural location and draws attention to the small villages of Simister and Bowlee and advises that they will be respected and will inform the layout, density and built form of development. However, as a result of the scale and form of development being proposed, the character and setting of these semi-rural villages will be totally lost and swallowed up by the new community being proposed within this major allocation. The character of the area will be completely changed and, in all reality, this will now become a large part of the general Greater Manchester urban area, as opposed to the semi-rural setting it currently benefits from.
- 7.14 **JPA2 – Stakehill:** Whilst this is a strategic allocation it is noted to be located in an area where a number of other sites are being proposed for development, and in that regard, attention should be paid to the detrimental cumulative impacts of these allocations on the extent and character of the Green Belt, the local community, transport networks etc. It is our view that individually and cumulatively the sites will be significantly detrimental with insufficient provision being made to mitigate the severe impact this scale of development will have on the local area. The smaller sites of interest have been addressed in other submissions being submitted under separate cover as part of the consultation process but have been summarised in the site assessments included at appendices 6,7 and 8.
- 7.15 This is once again a greenfield site on the edge of a settlement that will result in the joining up and coalescence of a number of smaller settlements to create a large urban mass. This completely disregards the purposes of the Green Belt and will fundamentally change the character of the local area. This will not secure a robust defeasible boundary as set out in the policy. There are concerns that the site is not best placed for access to local services, facilities and public transport, and once again is of scale that will result in detrimental issues and congestion on the local transport network. The primary access intended for 1000+ houses for the north area of Stakehill is onto an existing heavily congested A664 road main artery between Rochdale and

Manchester. The Stakehill Ind Est access roundabout, Cardinal Langley RC High School, and Hopwood Hall College, already render the road almost unusable at peak times. This congestion causes severe and dangerous tailbacks and stationary traffic onto the A627(M). The proposed secondary/emergency access route onto Thornham New Road will create further difficulties. We suggest that a full on-site assessment would render this proposed access as unviable and unsafe.

- 7.16 In addition to concerns on the impact of flooding from surface water within the wider local area given the significant increase in built development on site, it is noted that there are watercourses and ponds within and adjacent to the site, and as such assurances are sought that sufficient safeguards will be put in place to relation to flood risk, both on site and in the wider local area.
- 7.17 As a greenfield site there are extensive areas of existing vegetation and potential habitats for protected species. It is of significant concern that this development will obliterate these environmental and ecological networks, and that insufficient mitigation will be secured to justify the scale of development. The impact on the adjacent SSSI and Country Park both in terms of views and the potential for increased footfall from the new residents and future users to pathways etc. also needs to be given greater consideration at this stage.
- 7.18 The utilities report for the entire site is focused on the small area of industrial space to the south. The utility requirements for the 1650 houses are general and reported to be accessible from existing local networks. The energy and water capacity requirements for this number of dwellings is likely to be more than local networks can deliver. No statement or evidence of local deliverable energy, water or wastewater capacity is offered in the plan. If the capacity required is not technically or economically available to the site, then it could render the development economically unviable and brings into question the soundness of the whole plan.
- 7.19 Clarification is sought that this allocation will ensure the provision of much needed affordable homes, in circumstances where the policy itself makes reference to larger higher value properties. A development of this scale needs to be meeting identified housing needs and not simply securing the provision of executive homes. Failure to do so does not represent sound planning principles, will not be meeting identified housing needs, will be ineffective and therefore will not meet the tests of soundness and should therefore be deleted from the Plan.
- 7.20 We note from Historic England mapping service that there are listed buildings within the allocation and numerous other heritage assets within the local area. Ourselves and our client have serious concerns in relation to the impact of this allocation on the setting and character of these designated assets, particularly given that the development will fundamentally change the character of the wider local area.
- 7.21 Whilst the allocation seeks to secure the provision of some improvements in the local area, including investment in a new railway station, contribute and make provision for additional school places, cycle routes etc, these are not deemed to be sufficient to overcome the impact this level of new development will have on the local area.

Proposals include an intention to extend the local Primary School St Johns Thornham to accommodate the additional places required for the 1650 houses to be built. The school currently has capacity for 105 pupils and is full and oversubscribed by over five times each year. Construction Industry pre-development criteria indicates for 1650 houses the primary places requirement will be in excess of 300 which would mean a four-fold physical increase in the primary school size not simply an extension. The school Governing Board and the Church of England Diocese have neither been approached and therefore not suggested support or provided approval for any future extensions. The existing school is a voluntary aided small school and therefore not subject to Local Authority control or direction. Without planned and deliverable additional primary school places the site cannot be delivered and therefore raises the question of soundness of the Plan.

- 7.22 The Plan makes it clear at paragraph 11.52 that this allocation will increase traffic in local area and will lead to increased levels of traffic pollution. In an era of climate emergency and the need to reduce carbon emissions and improve health, it's unclear how such an impact can be found to be acceptable.
- 7.23 In relation to the final two remaining cross boundary allocations at Medipark and Timperley Wedge, given their proximity to one another it is clear that they are in fact one single large strategic allocation and the impacts of them individually and cumulatively will once again be significant. Whilst paragraph 11.56 within the Plan indicates that these are well-located, we would dispute such a statement given that whilst the sites are well located for access to the motorway network, they do not appear to be well positioned for access to wider public transport modes. Further, that access to local services and facilities will likely need to be undertaken in private vehicles as the distance on foot will likely not be acceptable. One of the reasons for justifying the location is noted to relate to the provision of HS2. However, given that this is unlikely to be brought forward for a significant period, and potentially towards the end of the Plan period, concern is raised as to whether these sites should be being brought forward within this plan period.
- 7.24 Our clients for the reasons set out above and below consider that like the other strategic Green Belt sites identified for release, that these two further cross boundary allocations should in fact be deleted from the Plan, with more consideration given to the development of brownfield and urban sites, and other reasonable alternatives.
- 7.25 **JPA3.1 – Medipark:** It is noted that the reasoned justification for this proposed allocation is somewhat limited in detail, providing third parties with very little clarity as to what they can expect from the proposed allocation and the technical issues which would need to be addressed at application stage. This would include the fact that the allocation is located adjacent to an area at risk from flooding, has existing vegetation and habitat potential which could be lost despite proposals for mitigation and green infrastructure through the site. There are also noted to be a number of Grade II listed heritage assets at Newall Green Farmhouse which will be affected by the development of this land parcel, and the impact on their setting and character need to be carefully considered with any harm robustly justified.

- 7.26 **Policy JPA3.2 – Timperley Wedge:** This is a significant development that would lead to the coalescence of existing urban areas. The area contains a significant rural park which does not require release from the Green Belt to be delivered. In any event the proposed boundary should exclude the area currently shown as a 'Rural Park'. As set out above and within the detailed site assessment within appendix 5, this allocation is unsustainable and unsuitable and should be deleted from the Plan.

Section 8 Conclusions

- 8.1 As set out throughout this consultation response, residents understand and support the need to secure jobs, homes and growth across the nine boroughs. Residents are however keen to ensure that the levels of development are commensurate with the scale of the GMCA area, are robustly justified with a sound evidence base, and that development is located in the most accessible and sustainable locations.
- 8.2 The PfE Publication Plan as prepared is unduly weighted on the release and delivery of Green Belt sites to meet the identified needs over the plan period. However, there are clear questions to answer in relation to the need for further examination of urban areas and particularly brownfield sites in meeting these needs. Given that this is now a requirement of the National Planning Policy Framework (section 13, paragraph 141) this test simply cannot be ignored, and we therefore ask that the GMCA review a further growth option and delete proposed allocations from within the Green Belt, in favour of the 'reasonable alternatives'.
- 8.3 The Covid-19 pandemic has had significant impact on the health and the economy of the region and nation, and we consider that greater regard should be paid to the impact on changes of lifestyle and behaviours on the need for development, and the role and development potential of the High Street and wider urban areas, which could release additional land for development and negate the need to release land from the Green Belt.
- 8.4 PfE focuses on addressing the issue of climate change, however the plan as drafted does not deliver on this. We therefore ask that the GMCA prepare a revised plan which focuses on delivering development on sustainable previously developed land, remediating and regenerating the areas within Manchester that need the investment, and to protect the amenity and quality of the Greater Manchester Green Belt from unjustified and unnecessary encroachment.
- 8.5 As drafted the Places for Everyone Publication Plan whilst having many positive objectives and aspirations, does not meet the tests of soundness. The Plan is not robustly justified, it is ineffective, inconsistent, incoherent, has not been positively prepared taking account of local circumstances, and in many areas is inconsistent with national guidance. We have laid out within the report our recommendations to overcome these issues, with a focus on the retention of land within the Green Belt.



Appendix 1 Action Groups within the Save Greater Manchester's Green Belt Umbrella Group

On the 29th of September 2021, the Management Committee of Save Greater Manchester's Greenbelt voted unanimously on behalf of our greenbelt and greenspace groups to approve our representation and submission to the Places for Everyone 2021 consultation by our agent Leith Planning Ltd.

Appendix 2 Extracts from the National Planning Policy Framework

Section 2 – Achieving Sustainable Development

Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Section 3 - Plan Making

Paragraphs 15 to 37 outline the requirements on plan making. Of particular note are paragraphs 16 and 35 which set out how plans should be prepared, maintaining effective cooperation and the tests of soundness:

Paragraph 16: Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;
- b) be prepared positively, in a way that is aspirational but deliverable;
- c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

Paragraph 24: Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

Paragraph 31: The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerns, and take into account relevant market signals.

Paragraph 35: Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

Section 5 – Delivering a Sufficient Supply of Homes

Paragraph 61: To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

Paragraph 62: Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travelers, people who rent their homes and people wishing to commission or build their own homes).

Paragraph 63: Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

- a) Off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- b) The agreed approach contributes to the objective of creating mixed and balanced communities.

Paragraph 65: Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:

- a) provides solely for Build to Rent homes;
- b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students);
- c) is proposed to be developed by people who wish to build or commission their own homes; or
- d) is exclusively for affordable housing, an entry-level exception site or a rural exception site.

Section 11 – Making Effective Use of Land

Paragraph 119: Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy as much as possible of previously developed or ‘brownfield’ land.

Section 13 – Protecting Green Belt Land

Paragraph 140 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 141 states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

Paragraph 142 outlines that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

Paragraph 143 notes when defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;

- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Paragraph 145 outlines that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use. Such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land

Appendix 3 Extracts from the National Planning Practice Guidance

Paragraph 001 - ‘The development plan is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. It is essential that plans are in place and kept up to date.’

Paragraph 005 – ‘Section 28 of the Planning and Compulsory Purchase Act 2004 enables 2 or more local planning authorities to agree to prepare a joint local plan. This can be an effective way of planning for an area’s strategic priorities, addressing cross-boundary issues through the duty to cooperate, and sharing specialist resources and reducing costs (e.g., through the formation of a joint planning unit, sharing of evidence base work or examination costs). Joint plans may also offer a more strategic framework across the joint area, setting the framework for future plans.

Preparation and adoption of joint local plans may be overseen either by the individual authorities involved or by a voluntary joint committee structure. Powers also exist for the Secretary of State to create a statutory joint committee, which would be the decision maker in relation to such matters as specified. Section 29 of the Planning and Compulsory Purchase Act 2004 enables local planning authorities to form a separate joint planning committee to take forward a joint local plan. This is a more formal step toward joint planning, with the respective local planning authorities delegating appropriate plan making powers to the Joint Committee.’

Paragraph 009 – ‘Strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans (including minerals and waste plans), spatial development strategies, and marine plans.

The National Planning Policy Framework sets out that these authorities should produce, maintain, and update one or more statement(s) of common ground, throughout the plan-making process. Local planning authorities are also bound by the statutory duty to cooperate. Neighbourhood Planning bodies are not bound by the duty to cooperate, nor are they required to produce or be involved in a statement of common ground.’

Paragraph 011 – ‘What is a statement of common ground expected to contain?’

It is expected to contain the following:

- a. a short written description and map showing the location and administrative areas covered by the statement, and a brief justification for these area(s);
- b. the key strategic matters being addressed by the statement, for example meeting the housing need for the area, air quality etc.;
- c. the plan-making authorities responsible for joint working detailed in the statement, and list of any additional signatories (including cross-referencing the matters to which each is a signatory);
- d. governance arrangements for the cooperation process, including how the statement will be maintained and kept up to date;
- e. if applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement;

- f. distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area;
- g. a record of where agreements have (or have not) been reached on key strategic matters, including the process for reaching agreements on these; and
- h. any additional strategic matters to be addressed by the statement which have not already been addressed, including a brief description how the statement relates to any other statement of common ground covering all or part of the same area.

The level of cooperation detailed in the statement is expected to be proportionate to the matters being addressed. The statement is expected to be concise and is not intended to document every occasion that strategic policy-making authorities meet, consult with each other, or for example, contact prescribed bodies under the duty to cooperate. The statement is a means of detailing key information, providing clear signposting or links to available evidence on authorities' websites.'

Paragraph 012 – 'When authorities are in a position to detail the distribution of identified needs in the defined area, the statement will be expected to set out information on:

- a. the capacity within the strategic policy-making authority area(s) covered by the statement to meet their own identified needs;
- b. the extent of any unmet need within the strategic policy-making authority area(s); and
- c. agreements (or disagreements) between strategic policy-making authorities about the extent to which these unmet needs are capable of being redistributed within the wider area covered by the statement.'

Paragraph 014 – 'Paragraphs 20-23 of the National Planning Policy Framework sets out the matters that the strategic policies should make provision for, this is not an exhaustive list and authorities will need to adapt this to meet their specific needs. For local planning authorities this is linked to matters set out in sections 19(1B to 1E) and 33A(4) of the Planning and Compulsory Purchase Act 2004'

Paragraph 22 – 'Strategic policy-making authorities should explore all available options for addressing strategic matters within their own planning area, unless they can demonstrate to do so would contradict policies set out in the National Planning Policy Framework. If there they are unable to do so they should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their plans for examination. Authorities are not obliged to accept needs from other areas where it can be demonstrated it would have an adverse impact when assessed against policies in the National Planning Policy Framework.'

Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates or are not relying on the inspector to direct them. Where a strategic policy-making authority claims it has reasonably done all that it can to deal with matters but has been unable to secure the cooperation necessary, for example if another authority will not cooperate, or agreements cannot be reached, this should not prevent the authority from submitting a plan for examination. However, the authority will need to submit comprehensive and robust evidence of the efforts it has made to cooperate and any outcomes achieved; this will be thoroughly tested at the plan examination.'

Paragraphs 27 and 28 – 'Where the Mayor or combined authority has responsibilities to deliver cross-boundary strategic matters, such as economic development and transport improvements they can be included as an additional signatory to a statement of common

ground prepared by local planning authorities, where their involvement will help deliver the matters identified in the statement.'

'It is not expected that each local planning authority (or London borough) within the combined authority area will be signatories on statements prepared for a spatial development strategy, or that the Mayor or combined authority will be a signatory to each local planning authority's statement.'

Paragraph 29 – 'The duty to cooperate was introduced by the Localism Act 2011, and is set out in section 33A of the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities and county councils in England, and prescribed public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters.'

Appendix 4 Places for Everyone Proposed Policy Wording

Policy JP-Strat 1 – Core Growth Area: States that:

“The economic role of the Core Growth Area will be protected and enhanced, with sustainable development supporting major growth in the number of jobs provided across the area providing opportunities to create jobs for local communities.

Complementary to, but not at the expense of, its economic function it will see a significant increase in the number and range of homes in areas with good connections to employment, training and education facilities. These homes will be supported by necessary green spaces and social infrastructure and will be of an appropriate design. In total sufficient land has been identified in the Core Growth Area for almost 98,000 new homes.

Infrastructure provision will support the growth and continued capacity of the Core Growth Area having particular regard to the Greater Manchester Transport Strategy 2040 refresh and accompanying Delivery Plans.”

Draft Policy JP-Strat 2 – City Centre states that ‘the role of the City Centre as the most significant economic location in the country outside London will be strengthened considerably. The City Centre will continue to provide the primary focus for business, retail, leisure, culture and tourism activity in Greater Manchester, but the increasingly important residential role of the City Centre will be expanded considerably by a range of high-density new homes, supported by necessary infrastructure. Development will enable people to take advantage of the access to education and training and the extensive public transport offer, reducing the need to travel to work whilst supporting economic growth and reducing levels of poverty.

It will be a priority for investment in development and infrastructure. This will include addressing current network capacity issues in the City Centre which will enable the future expansion of the rapid transit public transport network across Greater Manchester. Improvements in the public realm, walking and cycling facilities, and green infrastructure will help to enhance the local character and environmental quality of the City Centre so that it can rival city centres across the globe, enabling it to compete effectively at the international level for investment, businesses, skilled workers, residents and tourists. A broad range of commercial accommodation will be delivered, helping the City Centre to capture growth across key economic sectors.

The new functions within the City Centre will be delivered in a way that complement, rather than displace the area’s non-residential functions and will seek to protect and enhance the city centre’s historic environment and assets.

Over the period 2020-2037, land to accommodate around 2,200,000 sqm of office floorspace, over 56,000 new dwellings and minimal industry and warehousing (just over 35,000 sqm) has been identified within the City Centre.’

Draft policy JP-Strat 5 – Inner Areas indicates that ‘the continued regeneration of the inner areas will be promoted and will be linked to reducing levels of deprivation and poverty and supporting the improved health and wellbeing of the communities. High levels of well-designed new development will be accommodated in this highly accessible and sustainable location, prioritising the use of previously developed land.

New development will be of high quality, predominantly, residential (in a mix of size, type and tenure). It will be supported by necessary infrastructure, including high quality open space and improved access to the wider green infrastructure network, together with improved transport and social infrastructure.

Where a mix of uses is being proposed, it will seek to protect the amenity of existing and new residents and it will seek to protect and enhance the location's historic and natural environment and assets.

New development will be integrated with existing communities, enhancing the quality of places and their local character, including through good quality design, enhanced green infrastructure (and access to it) and improvements in air quality.

Over the period 2020-2037, land to accommodate around 270,000 sq m of office, around 132,000 sq m of industry and warehousing and around 30,000 new dwellings has been identified within the inner areas.'

Draft Policy JP-Strat 6- Northern Areas notes that a significant increase in the competitiveness of the northern areas will be sought 'There will be a strong focus on prioritising the re-use of brownfield land through urban regeneration, enhancing the role of the town centres and increasing the mix, type, quality and range of residential offer. This will be complemented by improvements to transport connectivity and the selective release of Green Belt and previously safeguarded land in key locations that will help to boost economic opportunities and diversify housing provision (GM-Strat 7 and GM-Strat 8). Improving transport connections and accessibility by public transport, cycling and walking will be a priority to ensure access to key employment opportunities. In supporting the principles of inclusive growth, the significant increases in economic growth in this location will help to reduce deprivation.

Development in this location will be of good quality and design, supported by the necessary infrastructure and amenities including improved access to green spaces.

Development in this location, particularly that on land which is being proposed to be released from the Green Belt, will seek to identify opportunities to protect and enhance the natural and historic environments to improve the local character.'

Draft Policy JP-Strat 7 – North-East Growth Corridor outlines that lying within the area and policy framework covered by JP-Strat 6, 'the North-East Growth Corridor which extends eastwards from Junction 18 of the M62 will deliver a nationally-significant area of economic activity and growth which will be supported by a significant increase in the residential offer in this location, including in terms of type, quality and mix, thereby delivering truly inclusive growth over the lifetime of the plan.

Over the period 2020-2037, land to accommodate almost 1 million sqm of new employment floorspace and almost 1,000 new dwellings has been identified within the whole Growth Corridor.

Specifically, this Plan allocates two major sites within the area, and makes associated changes to the Green Belt boundaries, to support this growth:

- Policy JP Allocation 1.1 'Heywood / Pilsworth (Northern Gateway)'
- Policy JP Allocation 1.2 'Simister and Bowlee (Northern Gateway)'
- Policy JP Allocation 2 'Stakehill'

In addition to these two allocations, there is considered to be a potential opportunity for further expansion of the economic and residential offer in the eastern most part of this key gateway

location. As such the Key Diagram identifies the High Crompton Broad Location. The land will remain in the Green Belt until such time that a review of this Plan and / or the Oldham Local Plan can demonstrate that it is necessary. The opportunity presented by the High Crompton Broad Location would serve to meet future employment and housing needs and demand of businesses and local communities in this part of the conurbation well beyond the end of the plan period. Well designed, sustainable development at this Broad Location would diversify further the employment and housing offer in Oldham by ensuring truly inclusive growth could be achieved which would help to reduce further the levels of deprivation and poverty.

The development of the area must ensure that necessary infrastructure is delivered to accommodate the likely scale of development.'

Draft Policy JP-Strat 8 – Wigan-Bolton Growth Corridor states that 'lying within the area and policy framework covered by GM-Strat 6, the Wigan – Bolton Growth Corridor will deliver a regionally-significant area of economic and residential development.

New highway infrastructure will connect Junction 26 of the M6 and Junction 5 of the M61 including public transport provision. Measures to improve the provision of bus services and to increase the use of rail lines will be implemented, potentially including a Wigan to Bolton Quality Bus Transit corridor, conversion of the Atherton line to allow for metro/tram-train services, and the electrification of the Bolton to Wigan line.

Over the period 2020-2037, land to accommodate just over 1million sqm of new employment floorspace and approximately 13,000 new dwellings has been identified within the area.

The majority of this new development will be on previously-developed land, within the urban area. However, in order to meet the overall spatial strategy, this Plan allocates the following sites within the area, and makes associated changes to the Green Belt, to further support the success of the growth corridor:

- Policy JP Allocation 4 'Bewshill Farm'
- Policy JP Allocation 5 'Chequerbent North'
- Policy JP Allocation 6 'West of Wingates / M61 Junction 6'
- Policy JP Allocation 34 'M6 Junction 25'
- Policy JP Allocation 37 'West of Gibfield'

In addition, the following will also be supported:

- The restoration of Hulton Park, and the provision of a Ryder Cup standard golf course and associated leisure and tourism facilities,
- The development of land at Royal Bolton Hospital, including a health village.'

Draft Policy JP-Strat 9 – Southern Areas outlines that 'the economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced. There will be a strong emphasis on prioritising the re-use of brownfield land and promoting the roles of the areas' town centres and its other key assets, including education and training facilities enabling people to gain access to employment opportunities. There will be an increase in the mix, type, quality and range of residential offer and a strengthening of its economic role. This will be complemented by improvements to transport connectivity, local character and the selective release of Green Belt in key locations.

The economic potential of, and benefits of investment in, Altrincham Trafford's Main Town Centres and Manchester Airport, along with associated transport infrastructure will be maximised. There will be an emphasis on improving transport connections and accessibility

by public transport, cycling and walking, ensuring access to key employment opportunities in this area. Development in these areas will contribute to reducing poverty and will be inclusive.

Development in these locations will be of good quality and design, supported by the necessary infrastructure and amenities and will seek to identify opportunities to protect and enhance the natural and historic environments and to improve the local character.'

Draft Policy JP-Strat 10 – Manchester Airport details that 'lying within the area and policy framework covered by JP-Strat 9 this policy seeks to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and its surrounding locality. Development which is in line with:

- Government policy
- Manchester's Local plan policies and
- Manchester Airport Group's Corporate Social Responsibility Strategy

will be supported delivering a sustainable world class airport which will help to address issues raised by climate change. With high quality services and facilities, it will be the UK's principal international gateway outside London. The airport and its surrounding locality will make a major contribution to the competitiveness of the North, Midlands and Wales by supporting inward investment, international trade and tourism, high quality new homes and supporting the economic and social regeneration. It will be central to raising our global profile and economic performance.

The accessibility and connectivity of the area will be greatly enhanced, including through:

- A. The development of a new HS2 station immediately to the west of the airport;
- B. Northern Powerhouse Rail connections to other city regions;
- C. The construction of the Western Leg extension of Metrolink via the proposed HS2 station, connecting through Davenport Green back to the existing line near Wythenshawe Hospital;
- D. Improved local public transport services and connections such as Bus Rapid Transit links by a new spine road through the Timperley Wedge allocation towards Altrincham;
- E. Improved local public transport services and connections, including to Stockport and Cheshire East areas;
- F. The provision of a network of cycling and walking routes.

The benefits of the exceptional connections will be maximised, including by:

1. Completing the development of Airport City immediately around the airport, which will provide a total of around 500,000 sqm of office, logistics, hotel and advanced manufacturing space;
2. Continuing to develop Medipark and Roundthorn Industrial Estate as a health and biotech cluster, taking advantage of the research strengths of the adjacent Wythenshawe Hospital and the wider Manchester University NHS Foundation Trust;
3. Delivering approximately 60,000 sqm of office floorspace around the new HS2 station;
4. Providing a minimum of 1,700 new homes to the west of the M56 at Timperley Wedge, up to 2037;
5. Providing sufficient development opportunities to take full advantage of the introduction of HS2 and NPR into this location.

This Plan allocates three sites near the airport, and makes associated changes to the Green Belt boundaries, to support these developments:

- Policy JP Allocation 3.1 'Medipark'
- Policy JP Allocation 3.2 'Timperley Wedge'
- Policy JP Allocation 10 'Global Logistics'

Draft Policy JP-Strat 11 – New Carrington states that 'lying within the area and policy framework covered by JP-Strat 9 this policy seeks to deliver a significant mixed-use development. Over the period 2020-2037 land to accommodate around 4,300 dwellings and 350,000 sqm of employment floorspace has been identified and will be delivered together with a new local centre.

New development will be fully integrated with the existing communities of Carrington, Partington and Sale West, enhancing the quality of places and their local character, including through good quality design, enhanced green infrastructure (and access to it) ensuring that maximum regeneration benefits are secured.

Major investment in active travel, public transport and highway infrastructure, such as the Carrington Relief Road, improvements to Junction 8 of the M60 and public transport corridors will be delivered to support the development of New Carrington, ensuring it is well-connected to the rest of Greater Manchester.

Policy JP Allocation 33 'New Carrington' allocates the development site and provides more detailed requirements for its implementation.

Draft Policy JP-Strat 12 – Main Town Centres outlines that 'the role of the main town centres as local economic drivers will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Development here will offer a significant opportunity to reduce levels of poverty and deliver inclusive growth.

Opportunities to further increase the population catchments of these centres will be taken, including significantly increasing the resident population of the main town centres by providing a mix of type and size of dwellings supported by the necessary infrastructure and amenities including new and improved public spaces and green infrastructure. This will be achieved alongside, rather than displacing, the range of non-residential uses in the centres. Housing growth along the key public transport corridors into the main town centres will also be promoted, further increasing the population catchments of those centres.

The role of the main town centres as major public transport hubs will be developed and supported by a network of active travel routes, enabling residents to have improved access to opportunities across Greater Manchester as well as within the centres themselves.

Development will be carefully managed to ensure that the local distinctiveness of each main town centre is retained and enhanced. Opportunities will also be taken to protect and enhance natural and historic assets in the town centres.

A new town centre is proposed for designation at Salford Quays in the Publication Draft Salford Local Plan: Development Management Policies and Designations. Should that designation become part of Salford's Adopted Local Plan, development in that location will be subject to this policy.'

Draft Policy JP-Strat 13 – Strategic Green Infrastructure notes that the following strategic green infrastructure assets will be protected and enhanced as key features:

1. River valleys and waterways (see Policy JP-G 3 'River Valleys and Waterways')
2. Lowland wetlands and mosslands (see Policy JP-G 4 'Lowland Wetlands and Mosslands')

3. Uplands (see Policy JP-G 5 'Uplands')
4. Trees and woodland (see Policy JP-G 7 'Trees and Woodland').

The protection and enhancement of these key strategic green infrastructure assets is complemented by a suite of policies to protect and enhance our network of green infrastructure, including protecting and enhancing sites of ecological value. This will enable our residents to access and maximise the benefits of green infrastructure on their health and wellbeing.

Draft Policy JP-S 1 – Sustainable Development advises that ‘to help tackle climate change, development should aim to maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts, utilise sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.

Preference will be given to using previously developed (brownfield) land and vacant buildings to meet development needs.

In bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively.’

Draft policy JP-S 2 – Carbon and Energy outlines that ‘the aim of delivering a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions, will be supported through a range of measures including:

- 9 Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling;
- 10 Promoting the use of life cycle cost and carbon assessment tools to ensure the long term impacts from development can be captured;
- 11 Taking a positive approach to renewable and low carbon energy schemes, particularly schemes that are led by, or meet the needs of local communities;
- 12 Keeping fossil fuels in the ground;
- 13 Planning for a balanced and smart electricity grid by identifying geographical locations which could support energy assets;
- 14 Increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree planting and natural flood management techniques;
- 15 Development of Local Area Energy plans to develop cost effective pathways to achieve carbon targets;
- 16 An expectation that new development will:
 - a. Be net zero carbon from 2028 by following the energy hierarchy (with any residual carbon emissions offset), which in order to importance seeks to:
 - i. Minimise energy demand;
 - ii. Maximise energy efficiency;
 - iii. Utilise renewable energy;
 - iv. Utilise low carbon energy; and
 - v. Utilise other energy sources.

With an interim requirement that all new dwellings should seek a minimum 19% carbon reduction against Part L of the 2013 Building Regulations.

- b. Incorporate adequate electric vehicle charging points to future proof for the likely long-term demand, taking account of the potential maximum energy demand for the site;
- c. Where practicable, prioritise connection to a renewable energy/heating/cooling network in the first instance or a low

carbon energy/heating/cooling network that is adaptable to non-fossil fuels at a later date;

- d. Achieve energy demand reductions for residential development in terms of space heat demand; hot water energy demand and the delivery of on-site renewable energy generation.

For renewable energy generation priority should be given to PV installation where technically feasible, alternative technologies will be appropriate where the equivalent generation is evidenced.

- e. For non-residential developments, achieve at least BREEAM excellent standard (or equivalent) for the 'Ene 01 – reduction of energy use and carbon emissions' category rising to 'BREEAM outstanding' equivalent for ENE 01 from 2028.
- f. Include a detailed energy statement to demonstrate via site relevant evidence how the development has sought to maximise reductions in carbon emissions in line with relevant policy targets, including the minimalisation of overheating risks and appropriate measures for post occupancy evaluation. Whole life cycle emissions should be considered where possible.

District Local Plans may set out specific carbon emission reduction targets, particularly if carbon neutral targets have been met sooner than 2038 or promote other measures through which energy efficiency of building and renewable energy generation can be achieved.

Draft Policy JP-S 4 – Resilience states that 'development will be managed so as to increase considerably the capacity of its citizens, communities, businesses and infrastructure to survive, adapt and grow in the face of physical, social, economic and environmental challenges, including climate change. Key measures will include:

1. Ensuring that developments make appropriate provision for response and evacuation in the case of an emergency or disaster;
2. Supporting the retrofitting of existing buildings, infrastructure and places to enhance their resilience;
3. Locating critical infrastructure and vulnerable uses away from locations at a high risk of acute shocks;
4. Providing adaptable buildings and places that can easily respond to changing needs, future climate impacts and new technologies;
5. Designing out opportunities for crime, anti-social behaviour and terrorism;
6. Designing indoor and outdoor environment to provide a reduction and respite from more extreme temperatures and winds associated with climate change and greater urbanisation;
7. Increasing the size, spread, quality and interconnectedness of the green infrastructure network, enabling the city region, its citizens and wildlife to adapt to changing conditions;
8. Taking an integrated catchment-based approach to managing flood risk;
9. Maintaining a very high level of economic diversity across Greater Manchester;
10. Contributing to the delivery of at least 50,000 additional affordable homes up to 2037;
11. Promoting significant enhancements in education, skills and knowledge;
12. Supporting healthier lifestyles and minimising potential negative impacts on health including air pollution; and
13. Carefully controlling the location of hazardous installations and new development that could be adversely affected by them.'

Policy JP-S 5- Flood Risk and the Water Environment advises that 'an integrated catchment-based approach will be taken to protect the quantity and quality of water bodies

and managing flood risk, by:

1. Returning rivers to a more natural state, where practicable, in line with the North West River Basin Management Plan;
2. Working with natural processes and adopting natural flood management approach to slow the speed of water drainage and intercept water pollutants;
3. Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding;
4. Expecting development to manage surface water runoff through sustainable drainage systems and as close to source as possible (unless demonstrably inappropriate) so as to not exceed greenfield run-off rates or alternative rates specified in district local plans, such as those identified for areas with critical drainage issues.
5. Ensuring that sustainable drainage systems:
 - i. Are designed to provide multifunctional benefits wherever possible, including for water quality, nature conservation and recreation;
 - ii. Avoid adverse impacts on water quality and any possibility of discharging hazardous substances to ground;
 - iii. Are delivered in a holistic and integrated manner, including on larger sites split into different phases; and
 - iv. Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development.
6. Securing the remediation of contaminated land and the careful design of developments to minimise the potential for urban diffuse pollution to affect the water environment;
7. Securing further investment in wastewater treatment to reduce the frequency of intermittent discharges of storm sewage; and
8. Conserving water and maximising water efficient in new development.’

Draft policy JP-S 6 – Clean Air: Outlines that a ‘comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met, including:

1. Locating and designing development, and focusing transport investment, so as to reduce reliance on forms of transport that generate air pollution;
2. Determining planning applications in accordance with the most recent development and planning control guidance published jointly by the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), and the most recent IAQM Guidance on the Assessment of Dust from Demolition and Construction, or relevant successor guidance, including the requirement for developers to submit construction management plans as appropriate;
3. Requiring applications for developments that could have an adverse impact on air quality to submit relevant air pollution data and, if approved, to make appropriate provision for future monitoring of air pollution;
4. Restricting and carefully regulating developments that would generate significant point source pollution such as some types of industrial activity and energy generation;
5. Significantly expanding the network of electric vehicle charging points, both for public and private use, including as part of new developments;

6. Implementing the charging Clean Air Zone within the Plan area, as directed by Government and associated measures;
7. Facilitating the more sustainable distribution of goods within the urban area, including through accommodating urban consolidation centres and urban distribution centres that use ultra-low-emission vehicles, and local delivery facilities to reduce repeat delivery attempts;
8. Designing streets to avoid trapping air pollution at ground level, including through the appropriate location and scale of buildings and trees;
9. Controlling traffic and parking within and around schools and early years sites;
10. Promoting actions that help remove pollutants from the air, such as enhancing the green infrastructure network and using innovative building materials that capture air pollutants; and
11. Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution, particularly for vulnerable users.'

Draft policy JP-J 2 – Employment Sites and Premises: notes that 'a diverse range of employment sites and accessible premises, both new and second-hand, will be made available across the Plan area in terms of location, scale, type and cost. This will offer opportunities for all kinds and sizes of businesses, including start-ups, firms seeking to expand, and large-scale inward investment, which will help to tackle inequalities.

A strong portfolio of prime investment opportunities for new floorspace will be brought forward in the key locations identified in Policy JP-J 1 'Supporting Long-Term Economic Growth' and in complementary locations, with many being particularly suitable for prime growth sectors and specialisms. This includes the selective removal of land from the Green Belt and other land previously safeguarded for development to provide the quality of well-connected employment land supply necessary to deliver the required scale of long-term economic growth, as set out in Policy JP-J 3 'Office Development' and Policy JP-J 4 'Industry and Warehousing Development'. We will work with Government and other stakeholders to increase the delivery of previously-developed sites for employment use, and hence minimise the need for any further Green Belt release.

Existing employment areas that are important to maintaining a strong and diverse supply of sites and premises in our boroughs will be protected from redevelopment to other uses, nurtured to ensure they remain competitive and their accessibility improved where necessary. This will include local employment areas as well as strategic locations such as the Tame Valley and the core of Trafford Park, and associated transport infrastructure such as the Trafford Park Freight Terminal'.

Draft policy JP-J 3 – Office Development states that 'at least 1,900,000 sqm of accessible new office floorspace will be provided in Greater Manchester over the period 2021-2037, with a focus on:

1. The City Centre, accounting for more than half of all new office floorspace in the sub-region and taking advantage of existing and proposed transport connectivity, including the proposed new HS2 and Northern Powerhouse Rail links which will further enhance its position as the premier office location outside London
2. The Quays, significantly expanding this distinctive office location and the continued growth of the nationally significant MediaCityUK
3. Manchester Airport Enterprise Zone and its environs, taking advantage of the extensive international connections, public transport accessibility, and proposed HS2 and Northern Powerhouse Rail links.

4. Town centres, offering a strong local profile and lower cost options with excellent public transport connections and access to services, with opportunities being sought to significantly increase the supply of new office floorspace beyond that currently identified especially in the northern parts of Greater Manchester.

The refurbishment of existing office accommodation will be encouraged including improving standards of accessibility.

Individual districts through Local Plans or other mechanism(s) may restrict the changes of use of existing office space to non-employment uses such as housing where this could compromise the continued supply of a diverse range of office floorspace.'

Draft Policy JP-J4 – Industry and Warehousing Development advises that 'at least 3,330,000 sqm of new, accessible, industrial and warehousing floorspace will be provided in Greater Manchester over the period 2021-2037.

To achieve this, a high level of choice and flexibility will be provided in the supply of sites for new industrial and warehousing floorspace, with a focus on:

1. Offering a range of opportunities
2. Making the most of the key locations identified in Policy JP-J 1 'Supporting Long-Term Economic Growth'
3. Significantly increasing the supply of high quality sites across the northern parts of Greater Manchester to help increase the competitiveness of that area, including a major strategic opportunity at Northern Gateway

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;
- C. Overnight parking for heavy goods vehicles; and
- D. Promote and support access by sustainable modes of transport.'

Draft Policy JP-H1 – Scale, Distribution and Phasing of New Housing Development outlines that 'a minimum of 164,880 net additional dwellings will be delivered over the period 2021-37, or an annual average of around 10,305.

Table 7.1, defines the land supply across Greater Manchester, demonstrating that brownfield land will be the predominant source of land over the plan period.

The new homes will be of good quality and design, adaptable, supported by the necessary infrastructure and amenities and their distribution (as set out in Table 7.2) will support the overall Plan's overall strategy which enables people to reduce the need to travel when taking advantage of Greater Manchester's key assets.

The phasing of development is set out in Table 7.2. Each local authority will monitor delivery rates within their area and will take action as necessary to ensure that delivery rates are maintained as anticipated in this plan. If this regular monitoring reveals significant deviation from the phasing in this plan, the factors resulting in these changes will be determined and consideration will be given to what action would be appropriate, including development management action and review of the policies in this plan. Any shortfall or surplus will be distributed over the remainder of the full plan period when calculating five-year supply. This work would feed into the regular reviews of this plan, although individual authorities may wish

to take specific local action outside the formal review process to ensure that they can maintain delivery rates.’

Draft policy JP-H2 – Affordability of New Housing: States that ‘substantial improvements will be sought in the ability of people to access housing at a price they can afford, including through:

1. Significantly increasing the supply of new housing, in accordance with Policy JP-H 1 'Scale, Distribution and Phasing of New Housing Development', thereby reducing the potential for a shortfall to lead to large house price and rent increases 2
2. Aiming to deliver our share of at least 50,000 additional affordable homes across Greater Manchester up to 2037, with at least 60% being for social rent or affordable rent(81)
3. Support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities), with locally appropriate requirements being set by each local authority 4. Working with Government to maximise the amount of public funding being directed towards the provision of new affordable housing 5. Increasing the supply of low-cost market housing, to complement the provision of affordable homes and diversify options for low-income households.’

Draft Policy JP-H4 – Density of new Housing: Advises that ‘new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport, in accordance with the minimum densities set out below.

Location (use highest density that applies when a site falls within more than one location)	Minimum net residential density (dwellings per hectare)		
	Within the location	Within 400 metres	Within 800 metres
Designated centres:			
City Centre	200	120	70
Designated town centres	120	70	50
Other designated centres	70	50	35
Public transport stops:			
Main rail stations and Metrolink stops in the City Centre	N/A	200	120
Other rail stations and Metrolink stops in large designated centres	N/A	120	70
Other rail stations with a frequent service and all other Metrolink stops	N/A	70	50
Leigh Guided Busway stops	N/A	50	35
Areas within GMAL 6 and above or its equivalent	50	35	35
All other locations: minimum net residential density of 35 dwellings per hectare			

Draft Policy JP-G10 – The Greater Manchester Green Belt notes that ‘the Green Belt as defined on the policies map will be afforded strong protection in accordance with the National Planning Policy Framework. The Green Belt as shown in figure 8.6 ‘The Green Belt 2021’ will

continue to be managed positively to serve the five purposes set out in national policy:

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

Positive and beneficial use of the Green Belt will be supported where this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for the residents and providing the high quality green spaces that will support economic growth.

Within the allocations identified on the Policies Map, 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').

Policy JPA1.1 - Heywood and Pilsforth (Northern Gateway): It is noted that policy JPA1.1 to support the allocation reads as follows:

Any proposals for this allocation must be in accordance with a comprehensive masterplan relating to the area to come forward in the plan period that has been previously approved by the LPA(s). It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development in line with Policy JP-D 1 'Infrastructure Implementation'. This should include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband and electric vehicle charging points, recreation provision and social infrastructure and ensure coordination between phases of development. Development at this allocation will be required to:

1. *Be of sufficient scale and quality to enable a significant rebalance in economic growth within the sub-region by boosting the competitiveness of the north of the conurbation and should;*
 - i. *Deliver a total of around 1,200,000 sqm of industrial and warehousing space (with around 700,000 sqm being delivered within the plan period). This should comprise a mix of high quality employment premises in an attractive business park setting in order to appeal to a wide range of business sectors including the development of an Advanced Manufacturing Park;*
 - ii. *Deliver around 1,000 additional homes along with a new primary school in the eastern part of the allocation to support the early delivery of the infrastructure and provide a buffer between existing housing and the new employment development;*
 - iii. *Deliver around 200 new homes, which includes an appropriate mix of house types and sizes and the provision of plots for custom and self-build housing, in the west of the allocation off Castle Road ensuring that an appropriate buffer is incorporated to separate this part of the allocation from the wider employment area and that appropriate highways measures are in place to prevent the use of residential roads by traffic associated with the wider employment area; and*
 - iv. *An appropriate range of supporting and ancillary services and facilities.*
2. *Make provision for significant new and improved highways infrastructure to enable the proposed level of development to be accommodated, including:*
 - i. *Improvements to Junction 3 of the M66;*

- ii. Improved links between Junction 3 of the M66 and Junction 19 of the M62;*
 - iii. Other off-site highway works where these are necessary to ensure acceptable traffic movement, including a contribution towards the mitigation proposed at Croft Lane, Hollins Lane/Hollins Brow*
- 3. Support the delivery of improved public transport infrastructure through the site allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential tram-train on the East Lancashire rail line between Bury and Rochdale) to enhance sustainable connectivity to the wider sub-region and adjoining districts and neighbourhoods;*
 - 4. Deliver a network of safe and convenient cycling and walking routes through the allocation designed to national and GM standards of design and construction and local planning requirements;*
 - 5. Make provision for affordable housing in accordance with local planning policy requirements;*
 - 6. Provide financial contributions for offsite additional primary and secondary school provision to meet needs generated by the development;*
 - 7. Make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points in accordance with relevant joint plan or local planning policies;*
 - 8. Ensure the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services, employment opportunities and over the M62 to proposed new development at Simister/Bowlee (JPA1.2);*
 - 9. Retain, enhance and replace existing recreation facilities, where required, and make provision for new recreation facilities to meet the needs of the prospective residents in accordance with local planning policy requirements;*
 - 10. Make provision for new, high quality, publicly accessible multi-functional green and blue infrastructure to provide health benefits to workers and residents as well as creating a visually attractive environment and providing linkages to the site's wider drainage strategy in accordance with Policy JP-G 2 'Green Infrastructure Network' and Policy JP-G 8 'Standards for Greener Places'. This should include the integration and enhancement of existing features such as Hollins Brook/Brightly Brook SBI and Whittle Brook;*
 - 11. Minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity';*
 - 12. Ensure that any development is safe from and mitigates for potential flood risk from all sources including Whittle Brook, Castle Brook and Brightley Brook and does not increase the flood risk elsewhere. The delivery of the allocation should be guided by an appropriate flood risk and drainage strategy which ensures co-ordination between phases of development;*
 - 13. Ensure that sustainable drainage systems are fully incorporated into the development to manage surface water and control the rate of surface water run-off, discharging in accordance with the hierarchy of drainage options. Where possible, natural SuDS techniques should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and be designed as multi-functional green infrastructure connecting to the wider green and blue infrastructure network in accordance with Policy JP-S 5 'Flood Risk and the Water Environment' and nationally recognised SuDS design standards. Proposals to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available;*
 - 14. Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and other areas of open space and sustainable drainage features;*
 - 15. Carry out a project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more;*

16. Provide an appropriate buffer between the development and the motorway/local road network where required to serve multiple functions including air quality, noise, visual mitigation and high quality landscaping;

17. Protect and, where appropriate, enhance heritage assets and their setting within the allocation, including the Grade II Listed buildings Brick Farmhouse and Lower Whittle Farmhouse and the wider historic character of the surrounding setting in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process; and

18. Carry out a detailed assessment and evaluation of known and potential archaeological sites including Meadow Croft Farm, historic landscape features and built heritage assets, to establish specific requirements for the protection and enhancement of significant heritage assets.

JPA1.2 - Simister/Bowlee (Northern Gateway): Policy JPA1.2 states that:

“Any proposals for this allocation must be in accordance with a comprehensive masterplan that has been previously approved by the LPA(s). It shall include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the whole development in line with Policy JP-D 1 'Infrastructure Implementation'. This should include the delivery of highways infrastructure, surface water drainage, grey infrastructure including utilities provision, green and blue infrastructure, broadband, electric vehicle charging points, recreation provision and social infrastructure and ensure coordination between phases of development. Development at this allocation will be required to:

1. Deliver a broad mix of around 1,550 homes to diversify the type of accommodation across the Simister, Bowlee and Birch and Langley areas. This should include an appropriate mix of house types and sizes, accommodation for older people, plots for custom and self-build and a mix of housing densities with higher densities in areas of good accessibility and potential for improved public transport connectivity and lower densities adjacent to existing villages where development will require sensitive design to respond to its context;
2. Facilitate the required supporting transport services and infrastructure including:
 - i. An upgrade of the local highways network
 - ii. Traffic restrictions on Simister Lane to prevent this route from being a form of access/egress to and from the allocation;
 - iii. Improved public transport provision through the allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential Bus Rapid Transit or Metrolink extension to Middleton) in order to serve the development; and
 - iv. Other off-site highway works where these are necessary to ensure acceptable traffic movement.
3. Deliver a network of safe and convenient cycling and walking routes through the allocation designed in accordance with national and GM standards of design and construction and local planning policy requirements;
4. Make provision for affordable housing in accordance with local planning policy requirements;
5. Make provision for a new two form entry primary school;
6. Make financial contribution towards off-site secondary school provision to meet the needs generated by development;

7. *Make provision for a new local centre in an accessible location which includes a range of appropriate retail, health and community facilities and ensure it is integrated with existing communities;*
8. *Make provision for other necessary infrastructure such as utilities, broadband and electric charging points in accordance with relevant joint plan or local planning policies;*
9. *Ensure the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services and the new areas of employment at Heywood/Pilsworth (JPA1.1);*
10. *Retain, enhance and replace existing recreation facilities where required and make provision for new recreation facilities to meet the needs of the prospective residents in accordance with local planning policy requirements;*
11. *Make provision for new, high quality, publicly accessible, multi-functional green and blue infrastructure within the allocation to provide health benefits to residents as well as creating a visually attractive environment and providing linkages to the sites wider drainage strategy in accordance with Policy JP-G 2 'Green Infrastructure Network' and Policy JP-G 8 'Standards for Greener Places'. This should include enhancement of existing watercourses throughout the allocation;*
12. *Minimise impacts on and provide net gains for biodiversity assets within the allocation, including the Bradley Hall Farm SBI, in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity';*
13. *Ensure that any development is safe from and mitigates for potential flood risk from all sources including Whittle Brook, Castle Brook and Brightley Brook and does not increase the flood risk elsewhere. The delivery of the allocation should be guided by an appropriate flood risk and drainage strategy which ensures co-ordination between phases of development;*
14. *Ensure that sustainable drainage systems are fully incorporated into the development to manage surface water and control the rate of surface water run-off, discharging in accordance with the hierarchy of drainage options. Where possible, natural SuDS techniques should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and be designed as multi-functional green infrastructure connecting to the wider green and blue infrastructure network in accordance with Policy JP-S 5 'Flood Risk and the Water Environment' and nationally recognised SuDS design standards. Proposals to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available;*
15. *Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features, other areas of open space and sustainable drainage features;*
16. *Carry out a project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more;*
17. *Incorporate appropriate noise and air quality mitigation measures and high quality landscaping along the M60 motorway corridors and local road network if required within the allocation;*
18. *Incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes;*
19. *Protect and enhance the heritage and archaeological assets within the vicinity of the allocation and their setting in accordance with the findings and recommendations of the assessment of heritage assets that forms part of the Plan's evidence base and any updated assessment submitted as part of the planning application process."*

JPA2 – Stakehill: The policy indicates that:

“Development at this site will be required to:

1. *Deliver around 150,000 sqm of high quality, adaptable, employment floorspace within a 'green' employment park setting, with a focus on suitable provision for advanced manufacturing and other key growth sectors, taking advantage of its accessible location and proximity to Junction 20 of the M62, and complementing the other opportunities within the North-East Growth Corridor;*
2. *Provide around 1,680 high quality homes, including larger, higher value properties, to support the new jobs created within the North-East Growth Corridor and create a sustainable and high quality extension to the urban area;*
3. *Achieve excellent design and sustainability through masterplanning and the use of design codes for the whole site to ensure comprehensive development. The scale of the residential development on the northern part of the allocation provides an opportunity to adopt a 'garden village' approach to create a locally distinctive residential offer;*
4. *Ensure that the design of the scheme preserves or enhances the setting of the listed St John's Church and war memorial in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated assessment submitted as part of the planning application process;*
5. *Protect and enhance archaeological features and where appropriate carry out archaeological evaluation in the form of geophysics, field walking and trial trenching for areas specified in the Stakehill Historic Environment Assessment 2020 to understand where especially significant archaeology must be preserved in situ;*
6. *Have regard to views from Tandle Hill Country Park in terms of the design, landscaping and boundary treatment in order to minimise the visual impact as much as possible;*
7. *Retain a strategic area of Green Belt between the A627(M) spur and Thornham Lane to maintain separation between the urban areas of Rochdale and Middleton;*
8. *Support the delivery of improved public transport to and within the area to promote more sustainable travel and improve linkages to the employment opportunities from surrounding residential areas;*
9. *Contribute to the proposed new railway station at Slattocks which is currently being investigated by TfGM and ensure that new development is designed in a way to maximise the benefits of the new rail station through the creation of high quality walking and cycling routes;*
10. *Provide good quality walking and cycling routes to connect to new and existing residential areas and local transport hubs in order to encourage sustainable short journeys to work and promote healthier lifestyles;*
11. *Provide appropriate access to electric vehicle charging infrastructure and cycle storage;*
12. *Provide financial contributions to mitigate impacts on the highway network identified through a transport assessment;*
13. *Improve access arrangements in and around Stakehill Industrial Estate to assist in the separation of residential and employment traffic as much as possible and to make appropriate provision for lorry parking;*
14. *Ensure that the existing settlements and pockets of housing are taken fully into account through the masterplanning of the area;*
15. *Deliver high quality landscaping and green and blue infrastructure within the site both to enhance the attractiveness of the scheme and provide opportunities for recreation to both residents and people working in the area. This should include good quality boundary treatment, particularly on the boundary separating the development area and land to be retained as Green Belt to the south to provide an attractive defensible Green Belt boundary;*

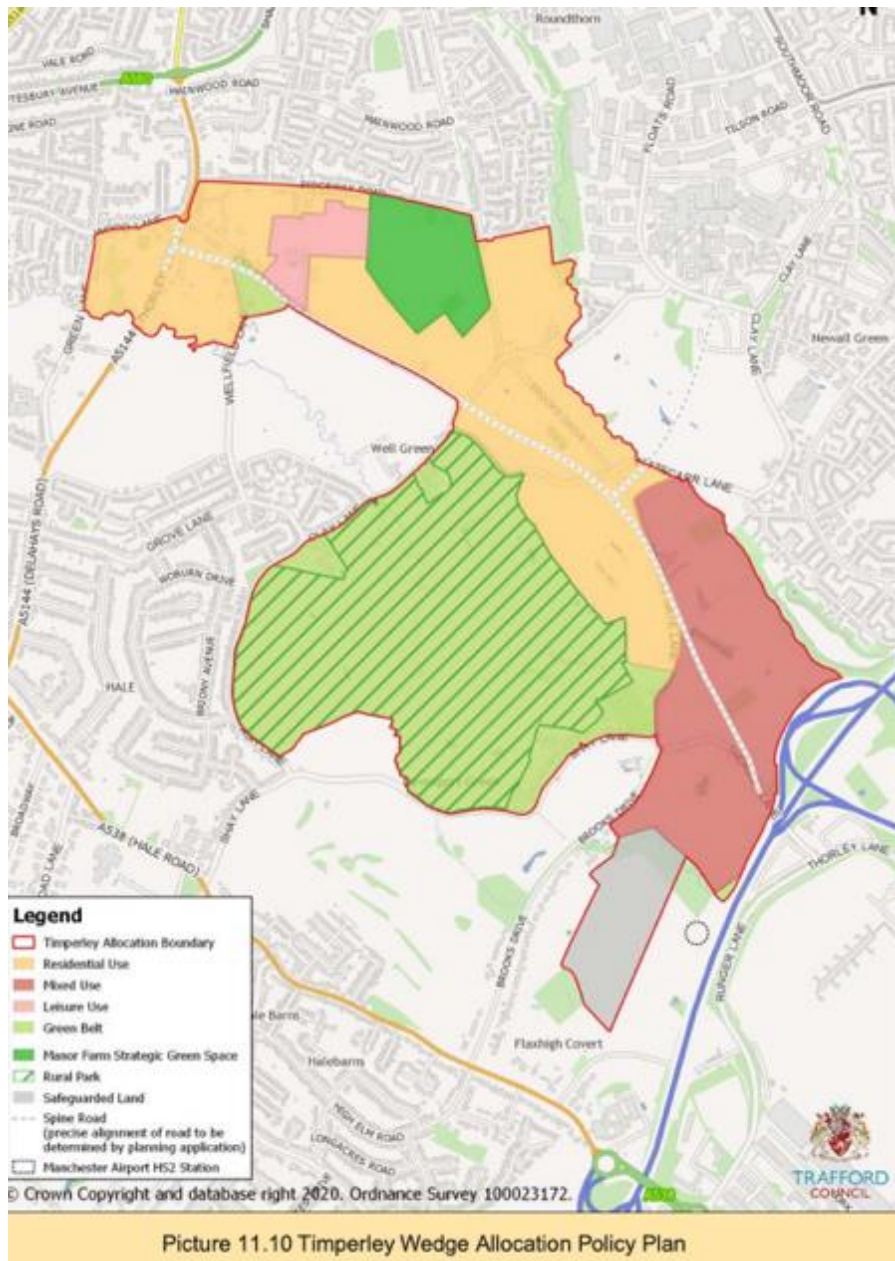
16. Retain and where possible enhance areas of biodiversity within the area, notably the Rochdale Canal Site of Special Scientific Interest, along with the existing brooks and ponds within the site;
17. Carry out a project specific Habitats Regulation Assessment for planning applications of 1,000 sqm / 50 dwellings or more;
18. Contribute and make provision for additional primary and secondary school places to serve the development. This will include provision of land and financial contributions to deliver the expansion of Thornham t John's Primary School located within the allocation;
19. Given the scale of the new housing provision it will be necessary for the proposal to deliver social infrastructure to ensure that the needs of new and existing communities are properly met; and 20. Incorporate appropriate noise and air quality mitigation taking account of the M62 and A627(M) motorway corridors.”

JPA3.1 – Medipark: The draft policy states that:

“Development on this site will be required to:

1. Deliver about 86,000 sqm B1-focused floorspace;
2. Development should be configured to take advantage of transport infrastructure in the area including the need to accommodate and contribute to the delivery of the proposed Metrolink Manchester Airport Line Western Leg extension;
3. Deliver a new spine road through the site with connections to the existing road network;
4. Facilitate improvements to the surrounding Strategic, Primary and Local Road Networks, including entry / egress and links to the strategic highway network, to enable safe access to and from the area;
5. Improve access to the site by providing links to local cycling and walking networks where appropriate;
6. Complement the wider Roundthorn Medipark development and the development proposed in Timperley Wedge;
7. Ensure development within the site should not impact the listed buildings of Newall Green or the adjacent playing field;
8. Incorporate suitable site mitigation to account for the historic landscape features within the site; and
9. Reflect the sequential approach to flood risk management, focusing more sensitive development furthest from Fairywell Brook. High quality natural landscaping, including the provision of native species, should be delivered adjoining the brook to help mitigate flood risk and promote biodiversity and green infrastructure.”

Policy JPA3.2 – Timperley Wedge: The policy states:



7.29 The policy is noted to go on as follows:

“Development of the site will be required to:

1. Be in accordance with a masterplan or SPD agreed by the Local Planning Authority to ensure the site is planned and delivered in a coordinated and comprehensive manner; Residential Development
2. Deliver around 2,500 homes of which 1,700 will be in the plan period as set out in the Allocation Policy Plan;
3. Deliver high quality residential units which are accessible, integrated with the existing community and well designed to create a genuine sense of place;
4. Deliver a range of house types, sizes, layouts and tenures through a place-led approach;
5. Deliver residential development at an average density of 35 dph in the northern part of the allocation area, reflecting the existing urban area. Higher

density development at an average of 70 dph will be appropriate close to the new local centre, Davenport Green Metrolink stop and the HS2 / NPR Manchester Airport station;

6. Provide a minimum of 45% affordable housing throughout the site;

7. Make specific provision for self-build custom build plots, subject to local demand as set out in the Council's self-build register; Employment Development

8. Deliver around 60,000 sqm B1 office employment land within a mixed employment residential area set out in the Allocation Policy Plan; of which 15,000 sqm will be in the Plan period;

9. Create legible streets and space within the employment area with attractive buildings that respond positively to the landscape and provide accessible linkages to residential areas and the local centre;

10. Create employment and training opportunities for local people, in particular through the construction phase, to be set out in a Local Labour Agreement in accordance with Local Plan policies; Delivery and Phasing

11. Co-ordinate the phasing of development with the delivery of infrastructure on the site, ensuring sustainable growth at this location;

12. Make a proportionate contribution, by means of an equalisation mechanism, to infrastructure delivery. Detailed requirements will be set out in the masterplan/SPD;

Transport Integration and Accessibility

13. Deliver accessible streets which prioritise cycling, walking and public transport over the private car;

14. Deliver a network of new safe cycling and walking routes through the allocation, including enhancements of Brooks Drive and creating new/enhancing existing Public Rights of Way;

15. Accommodate and contribute to the delivery of the Manchester Airport Metrolink Line Western Leg extension including Metrolink stop(s);

16. Deliver a new spine road through the site with connections to the existing road network and local access to development sites, incorporating separate pedestrian and cycling space and provision for future bus rapid transit to improve east west connections between Altrincham and Manchester Airport;

17. Make the necessary improvements to the Strategic, Primary and Local Road Networks to enable the proposed level of development and mitigate the impact of increased vehicle numbers, including:

- i. Road Widening at Dobbinetts Lane
- ii. Junction improvement to Thorley Lane/Runger Lane
- iii. New roundabout junction at Thorley Lane/Green Lane/Clay Lane
- iv. Contributions to improvements at M56 Junction 3 and Terminal 2 roundabout Community Facilities

18. Provide a new local centre with convenience shopping facilities as a hub for local services in the region of 3,000 sqm of retail floorspace close to the Davenport Green stop of the Metrolink Western Leg extension;

19. Provide additional primary school places, including a new primary school and contribute to the provision of secondary school places;

20. Provide and contribute to new health facilities to support the new community;

Green Belt

21. Create defensible Green Belt boundaries utilising, where appropriate, existing landscape features;

22. Mitigate any impact on and improve the environmental quality and accessibility of remaining Green Belt land; Green Infrastructure

23. Provide a significant area of enhanced and accessible green infrastructure (including new public rights of way) within a rural park to remain

in the Green Belt identified on the Allocation Policy Plan, ensuring protection of heritage assets in this area;

24. Create wildlife corridors and stepping stone habitats within the development areas to support nature recovery networks, provide ecosystem services and accessible green infrastructure including green links:

- i. From Clay Lane through to Brooks Drive and Fairywell Brook
- ii. Through Davenport Green Ponds SBI to Medipark

25. Provide a range of types and sizes of open space within the allocation boundary in accordance with the Council's open space standards, including local parks and gardens; natural and semi-natural greenspace, equipped and informal play areas; outdoor sports pitches and allotment plots, ensuring arrangements for their long term maintenance;

26. Protect Manor Farm identified in the Allocation Policy Plan and promote its use for future sports provision including, where appropriate, new access and car parking;

27. Promote improvements to leisure facilities at Hale Country Club; Natural Environment

28. Protect and enhance natural environment assets within the site and surrounding area, including SBIs, woodland and hedgerows;

29. Deliver a clear and measurable net gain in biodiversity, including provision for long-term management of habitats and geological features which may include SUDs systems of high biodiversity value created as part of the overall flood risk and drainage strategy;

30. Protect and enhance the habitats and corridors along Fairywell Brook and Timperley Brook to improve the existing water quality and seek to achieve 'good' status as required under the North West River Basin management plan (2019); Landscape

31. Retain important landscape views and landscape features such as ponds, woodland and hedgerows and use these features to develop a distinct sense of place;

32. Provide appropriate landscape buffers across the site, including a substantial landscape buffer along the Green Belt boundary to mitigate the impact on the rural landscape to the south west of the allocation area; Design

33. Ensure new development is place-led, creative and contextual in its response, respecting the local character and positive local design features of the area;

34. Be in accordance with the Council's adopted Design Guide embracing strategic design principles, including creating connected communities, redefining streets, delivering inclusive characterful design and responding to heritage;

35. Respect the urban/rural fringe setting in the design of the development, in terms of its height, scale and siting and demonstrate high standards of urban design;

Historic Environment

36. Conserve and enhance the historic environment in line with the findings and recommendations of the Historic Environment Assessment (2020) in the Plan's evidence base and any updated HIA submitted as part of the planning application process;

37. Protect and enhance archaeological features and, where appropriate, carry out archaeological evaluation in the form of geophysics, field walking and trail trenching for areas specified in the Timperley Wedge Heritage Assessment 2020 to understand where especially significant archaeology must be preserved in situ; Utilities, Environmental Protection and Climate Change

38. Mitigate the impacts of climate change and utilise the most energy and water efficient technologies to achieve zero carbon by 2028;
 39. Explore and deliver the most appropriate solutions to providing decentralised low carbon heat and energy as part of new residential and employment development. This will include exploring the potential for the development of district heat, cooling and energy networks, energy centres, the implementation of renewable and low carbon heat and energy technologies in design and the co-location of potential heat and energy customers and suppliers;
 40. Ensure new development maximizes on-site renewable energy measures in line with the energy hierarchy, for example, via solar PV and other low carbon technologies, linked to the provision of and supply to electric vehicle charging infrastructure;
 41. Make provision for other necessary infrastructure such as utilities, full fibre broadband and electric vehicle charging points in accordance with relevant Places for Everyone or Local Plan policies;
 42. Mitigate flood risk and surface water management issues including provision of SUDS through the design and layout of development in accordance with a flood risk, foul and surface water management strategy. The allocation-wide drainage strategy should be prepared after having fully assessed site topography, flood risk, existing water features and naturally occurring flow paths to identify where water will naturally accumulate. The strategy will demonstrate how each phase interacts with other phases of development and further detail will be set out in the Masterplan / SPD;
 43. Incorporate on-site measures to deal with surface water and control the rate of surface water run off. Planning applications will be expected to apply the full surface hierarchy and ensure water is managed close to where it falls by mimicking the natural drainage solution;
 44. Demonstrate that development proposals will not adversely affect existing water supply infrastructure that passes through the site. This will include consideration of any changes in ground levels and management of the construction process;
 45. Seek to actively reduce the impact of potential flood risk both within and beyond the site;
 46. Incorporate appropriate noise and air quality mitigation, such as woodland buffers, particularly along the M56 motorway, the Metrolink and HS2/NPR corridor in line with Environmental (Noise) Regulations;
- Safeguarded Land - HS2 Growth Area
47. The land identified to the south and west of the HS2 Airport station as shown on the Allocation Policy Plan, although removed from the Green Belt, is not allocated for development at the present time;
 48. The land is safeguarded in accordance with Policy JP-G 11 'Safeguarded Land';
 49. Any future allocation is subject to an assessment that the land directly contributes to the Greater Manchester HS2 / NPR Growth Strategy and it should only be developed after completion of development set out in the Timperley Wedge masterplan/SPD and following the delivery of HS2 Airport station; and
 50. Should a HS2 Airport station not be developed, the land will return to Green Belt following a future Plan review."

7.30 This is a significant development that would lead to the coalescence of existing urban areas. The area contains are significant rural park which does not require release from the Green Belt to be delivered. In any event the proposed boundary should exclude the area currently shown as a 'Rural Park'

Appendix 5 Site Assessments of Proposed Strategic Allocations

Site Assessment Heywood/Pilsworth

Site Plan

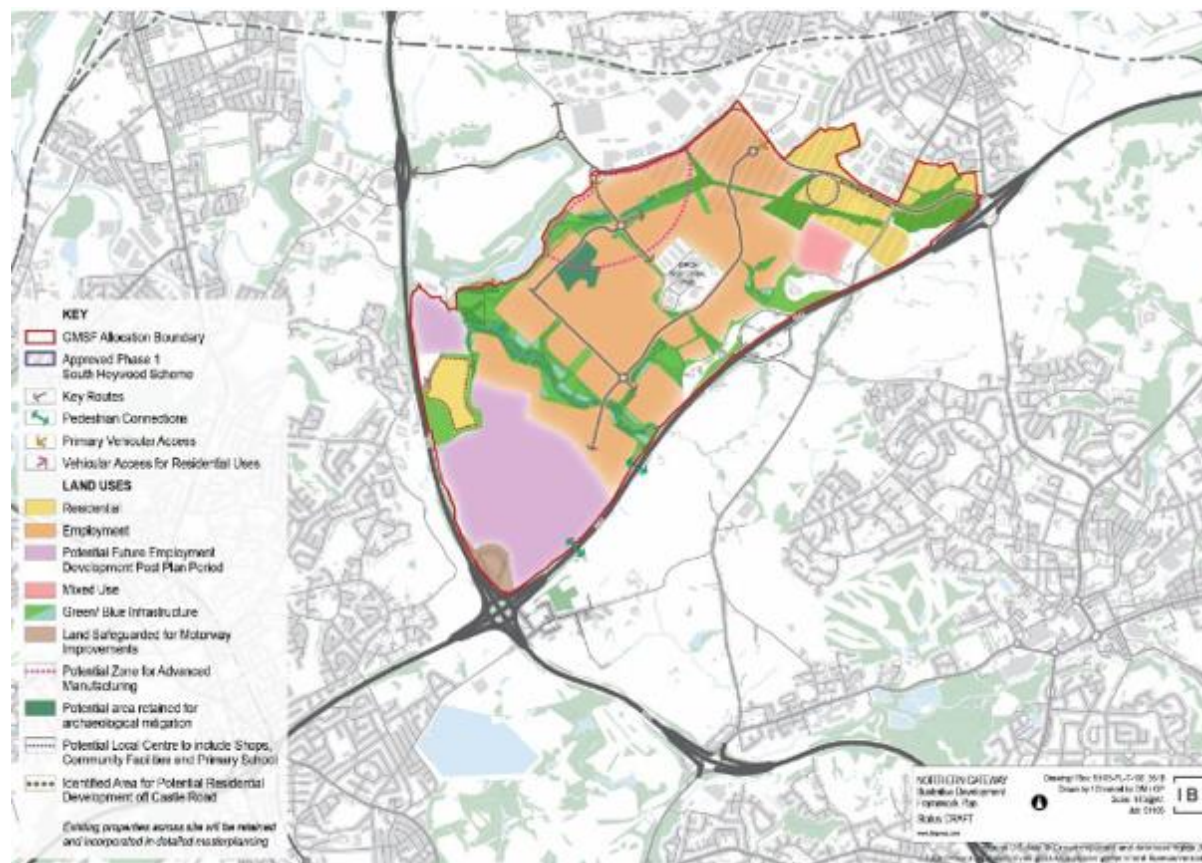


Image Source: PFE – Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 1.1		
Site Address	Land to the north of Junctions 18 and 19 of the M60/M62		
Postcode	-	Site Area (HA)	640 ha – 330 hectares within Bury and 310 hectares within Rochdale
Description of Site	The majority of the proposed allocation (99.4% of the site /636 hectares) is located within designated Green Belt as defined by the adopted Development Plan. The site is majority vacant greenfield land, but is also noted to contain a golf course on the western boundary.		

Current Land Use	Predominantly greenfield agricultural land but also understood to include a fishery and a golf course.
Brownfield/Greenfield	Other than a small portion of the proposed development site the significant majority of the allocation is currently greenfield.
Surrounding Details	
Land Uses	The site is bounded to the south west by junction 18 of the M60 motorway, to the south by the M62, to the west by the M66, to the east by the settlement of Hopwood and to the north by vacant greenfield land and Pilsworth Road.
Character of Surrounding Area	Whilst situated on a major motorway interchange, the site and immediate surrounding area is currently predominantly rural and green in character.
Constraints	
Policy Constraints	The majority of the site is designated as falling within the Green Belt.
Ground Conditions	<p>Indicative information suggests the majority of site is uncontaminated, but there are noted to be some potential areas requiring further investigation and some potential risks, including around the former bleach works. Given that the allocation includes for vulnerable uses it is important that the impact of contamination is fully understood, remediation duly confirmed and the costs of such works assessed within the overall viability of the site delivery.</p> <p>In terms of geotechnical matters it is noted that there remain many unknowns in relation to potential mine shafts, quarry pits etc. These elements should be explored further in advance of allocation/development on site. It is noted that the reports supporting the allocation also confirm the same.</p>
Flood Risk & Drainage	Whilst the site is understood be located within flood zone 1 there are noted to be 3 watercourses within the allocation boundary, with some areas along these watercourses located within flood zone 3. Whilst the Topic Paper for the site indicates that these areas of flood zone 3 do not present any restriction to development further work is still required in relation to the impact of such a large loss of permeable greenfield on surface water flows. The impact of flow rates within the existing water courses and to confirm that there will be no surface water flooding within the wider local area given the scale of development being proposed. Given that paragraph 12.6 of the Topic Paper confirms that 'this is a large allocation with the potential to create significant volumes of runoff if infiltration is not possible, only exacerbates these concerns. The paragraph goes on to confirm that downstream areas at risk and additional volumes of water, even if the runoff rate is controlled, could increase scale or duration of flooding downstream'.

	<p>It is not therefore our view that just because the site is within flood zone 1 that is capable or suitable for development in relation to drainage and flood risk.</p>
<p>Transport</p>	<p>Given the proximity of the site to the motorway network and the scale of development being proposed it is clear that to deliver the allocation significant investment will be required and large scale changes made to the highway network. In fact paragraph 11.1 of the Topic Paper states that ‘due to the current undeveloped nature of the allocation, much of the immediate local highway network is currently not of a nature that could accommodate strategic development without an appropriate upgrade.’</p> <p>Paragraph 11.2 of the Topic Paper goes on to confirm that the allocation is expected to give rise to significant levels of traffic demand over both the strategic and local road roads. Whilst improvements and mitigation is being proposed in reality, this scale of development, in this location will result in congestion and highway safety concerns both on the local highway network and surrounding motorways. The M66/M62/M60 motorway interchange is ready regularly congested with vehicles queuing unsafely on the motorways, particularly at peak times. The delivery if this large scale allocation will in reality only add to the existing challenges and therefore raises significant concern in relation to highway safety and the increased of accidents form vehicles queuing to get on and off the motorway network. This will then lead to additional queuing and congestion on local roads, with vehicles idling, increasing pollution etc to an unacceptable degree.</p> <p>The site is not well located for access to public transport connections or local services and facilities, many of which are located on the other side of the major motorways, meaning access on foot will be limited, further increasing the demand on the highway network. Whilst mitigation is being proposed it is noted deemed sufficient to demonstrate that this is a sustainable location for development.</p> <p>The extent of works required to deliver this site in relation to the highway network and mitigation to enhance access to public transport is noted to be extensive, and does raise the question of the viability and deliverability of the site.</p>
<p>Utilities</p>	<p>There is noted to be a water main within the north western part of the allocation which will need to be diverted or accommodated within the masterplan. Clarification should be provided at this stage that existing water supplies will be protected both during construction and once the site has been developed. Further, it is noted that additional information is required in relation to foul sewerage given that there are no existing sewers on site. These fundamental issues ned to be addressed to ensure that the site will not pose a danger to local water sources, ground water or human health.</p>

	<p>There is also noted to be a high-pressure gas main running through the northern part of the allocation and it is essential that this will be unaffected by the development and that assurances can be made in relation to community safety. Proposing a buffer and green landscape corridor is noted but clarity is sought that this will be safe with no danger of root encroachment and root damage to the pipeline.</p>
<p>Environmental</p>	<p>As Green Belt, and predominantly green field land, any development within the proposed allocation area will have an impact on the existing site environment, with the proposed removal of 636 hectares of land from the Green Belt.</p> <p>It is noted that the land within the allocation performs strongly in relation to meeting the unrestricted sprawl of large built up areas, and in preventing neighbouring towns from merging into one another. In reality given the scale and form of development being proposed the release of this site from the Green belt will result in coalescence of settlements, and the creation of one large urban mass to the detriment of the character and visual amenity of the local area..</p> <p>The assessment acknowledges that the release of the land from the Green Belt will result in harm to the purposes of the Green Belt – the mitigation proposed is not of substantial weight to justify the harm, and the proposed land additions simply do not alleviate the concerns of the local community. The provision of green gaps will simply not prevent the settlement coalescence when viewing the development as a whole.</p> <p>As laid out within the overarching objection to the Plan, the GMCA have simply failed to make a sufficient case for exceptional circumstances to support the release of this site for development and it should therefore be protected and retained within the Green Belt.</p> <p>Given the prominence and visibility of large parts of this site from the motorway network and wider surrounding areas the visual impact from the development will be significant and the provision of landscaping is simply not going to be sufficient to mitigate the loss of this green gap, or to address the concerns relating to the impact of this development on the environment.</p> <p>There is insufficient evidence to support the statement that the development will ultimately achieve net gains in biodiversity, particularly given the loss of such an extensive areas of green space. Whilst the Topic Paper at section 16 indicates that existing trees, hedgerows and water features will be retained where possible, the reality is that deliver a scale and layout of development this will not be possible. This will therefore result in the destruction of habitat and ecological networks that cannot be replaced.</p>

	<p>The allocation is noted to be located within the National Character Area 54, Manchester Pennine Fringe and occupies a transition zone between open moorlands of the Peaks and the Southern Pennines. The Topic Paper confirms at paragraph 18.1 that the landscape is mostly farming, characterised by open fields bounded by hedgerows and field trees, with areas of woodland. Clearly this character will be lost should the site be brought forward for development.</p> <p>There are noted to be a number of areas on which tree preservation orders have been applied, and these should be protected and retained.</p> <p>In terms of protected species it is clear that insufficient assessment has been undertaken in that regard. Further, that given the scale of development and loss of greenspace that there will be loss of habitat and species loss. This is unacceptable to local residents who request that this important environmental and ecological features be retained and protected.</p> <p>Paragraph 19.5 of the Topic Paper indicates that peat has been confirmed as present on Unsworth Moss and that further discussions will be required with Natural England and GMEU to determine whether this is restorable. Given the environmental importance of peat this should be protected at all costs and any potential impact or loss should not be deemed acceptable. Given the damage and loss caused in recent years from wild fires on the moorland with the associated loss of peat and important protected species this issue is of significant concern to the local community.</p> <p>Given the proximity of the proposed allocation to a number of major strategic road networks there are real concerns unrelated to the impacts on air pollution, health and noise, both in terms of impacts created by the development, but also the amenity of the proposed occupiers of the dwellings from noise from the motorways, and potential air pollution. The mitigation measures proposed to address these concerns are simply not deemed to be sufficient to justify the development of the site.</p>
<p>Historic Environment</p>	<p>There are noted to be two listed buildings within the allocation boundary, both of which are understood to be 17th century farmhouses. One of which is thought to be the oldest brick-built farmhouse in the area. Whilst the buildings will be retained and incorporated into the development, there are concerns that there will be resultant harm on the character and setting of these important buildings, given the scale and form of development being proposed.</p> <p>It is further understood from section 21 of the Topic Paper that there is the potential for significant archaeological finds on parts of the site, to a degree that the site has the potential to be Scheduled as a nationally important archaeological site. The</p>

	<p>potential harm resultant on this nationally important site therefore needs to be given due consideration.</p> <p>There are understood to be a number of other potential areas of archaeological interest that in our view should be explored and better understood prior to agreeing to release the site for development.</p>
Social	<p>The site is noted to be delivering a primary school and local centre to support the development. Whilst welcomed, this will impact on social integration and runs the risk of creating a stand alone community. The impact on secondary school [places is noted to need further consideration, and in our view this is unacceptable. It is imperative that developments being brought forward can be accommodated within their local area or make the necessary contributions to ensure that there impact on social networks is mitigated. Failure to secure confirmation on this point at this stage of the Plan process, raises the question as to whether the site should be being brought forward as an allocation.</p> <p>There will clearly be increased pressure placed on local health services and simply indicating that further work is required to determine levels of existing capacity is simply unacceptable and does not provide existing local communities the assurances they need that they can access their GP and other health service as they can currently, with the proposed allocation not placing additional undue pressure on the NHS.</p>
Requirements to overcome constraints	<p>There are extensive mitigation proposals to deliver this site including in relation to transport, highways, landscape, green Belt, education, with many other potential additional contributions required once further work has been completed including in relation to flood risk, drainage, health etc.</p>
Planning History	<p>It is understood that on the part of the site falling under the jurisdiction of Bury Council that there have been no planning applications of interest/relevance to the proposed allocation of the site.</p> <p>In Rochdale it is understood that planning permission was granted in March 2020 for development including a new link road, 135,000sqm of employment floorspace, 1,000 new homes, a new local centre, primary school, landscaping and sports pitches. It is understood that this approval is currently being delivered.</p>
Deliverability	<p>It is noted that when factoring in the strategic transport costs required to deliver this allocation that the scheme results in a £16.5m pound shortfall. This is noted to not account for potential increases in costs in transport delivery, and given the on going rising construction prices is therefore deemed to be under estimating the potential loss. When factoring in other elements which are still unknown such as health contributions</p>

	<p>drainage requirements, archaeological issues etc it is clear that this allocation is unviable, and is therefore undeliverable. We therefore ask that the site be deleted from the Plan.</p>
<p>Anticipated timeframe for availability</p>	<p>Not known</p>
<p>Commentary</p>	
<p>This allocation proposed the loss of 636 hectares of Green Belt land. This scale of loss can do nothing but result in harm to the character and purposes of Green Belt and will result in coalescence of settlements and the loss of an existing strategic green space. The case for exceptional circumstances is not sufficient to justify the release of this site.</p> <p>The development will result in significant detrimental impact on the strategic and local transport network and is poorly located for access to services, facilities and public transport connections. This site is not therefore deemed to be sustainable.</p> <p>The scale of development, and the associated loss of permeable greenspace is likely to result in surface water flooding in the local area. The scheme will have detrimental impacts on the environment, result in the loss of habitat, potential damage to peat and loss of protected species and increase noise and air pollution to an unacceptable degree.</p> <p>There are listed buildings within the allocation boundary whose setting will be harmed by the scale and form of development, and there is a potentially nationally significant archaeological site which needs to be protected.</p> <p>The development given its prominent location and gross scale will result in detrimental impact on local visual amenity and views across the site from the motorway network.</p> <p>The site will not enhance social integration given it seeks to create an almost self contained community, bounded to the south and west by major highways.</p> <p>The scheme has been shown to be unviable and as such the allocation is not shown to be deliverable and should therefore be deleted from the Plan.</p>	

Site Assessment Medipark

Site Plan

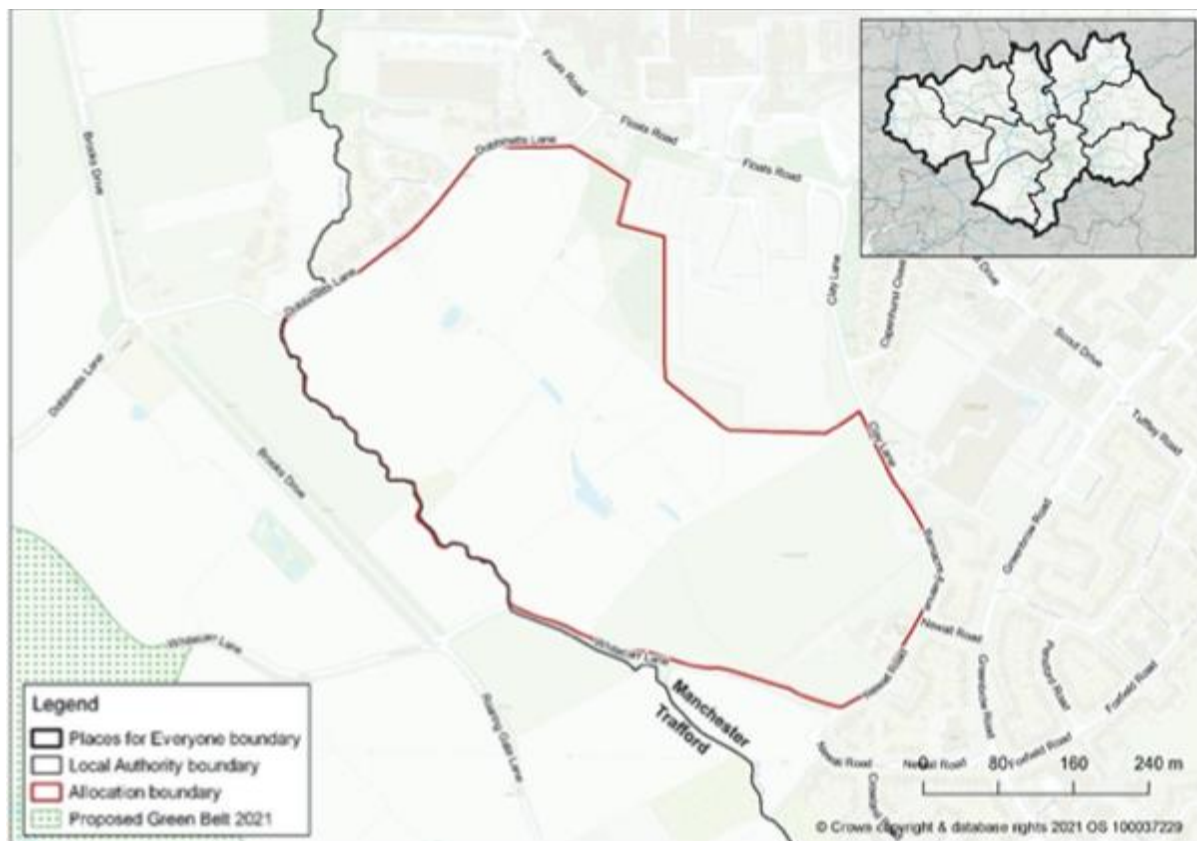


Image Source: PfE – Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 3.1		
Site Address	- land to north east of Whitecarr Lane, Trafford		
Postcode	-	Site Area (HA)	21.4 ha
Description of Site	The proposed allocation is sited wholly within Green Belt as designated within the adopted Development Plan.		
Current Land Use	The site is currently greenfield agricultural land used for the keeping and stabling of horses.		
Brownfield/Greenfield	This is a greenfield site		
Surrounding Details			
Land Uses	This is a vacant greenfield site with open countryside located to the north, west and south. The settlement of Wythenshawe is located to the east and south east of the proposed		

	allocation, with Wythenshawe Hospital and staff car parking located adjacent to the site.
Character of Surrounding Area	Whilst there is built development within the settlement of Wythenshawe located to the east, north east and south east of the allocation, the character of the surrounding areas is rural.
Constraints	
Policy Constraints	The site is located within Green Belt as designated within the adopted Development Plan.
Ground Conditions	<p>It is noted from the Topic Paper supporting this proposed allocation, that there have been no site surveys undertaken as the site is planned for development later in the plan period. This is clearly unacceptable, as once adopted any allocations proposed within the Plan could come forward for development. It is therefore imperative that any sites proposed to be brought forward within this Plan period are suitably assessed in advance of the Examination, to ensure that they are available, suitable and deliverable. Failure to do so will render the proposed allocation and associated policy unsound.</p> <p>Whilst it is accepted that the land is greenfield there still needs to be an assessment of the ground conditions to ensure that any potential contamination or geological issues are understood and suitably addressed and assessed in relation to the viability and deliverability of the proposed allocation. The allocation is not therefore deemed to have been justified given the lack of detail on this important issue.</p>
Flood Risk & Drainage	<p>The Topic Paper supporting the allocation of this site indicates that no level 2 Strategic Flood Risk Assessment has been required for this site. However, the site is noted to be located within the Upper Mersey Catchment Flood Management Plan, and areas in the south and south western portion of the site are noted to be located within flood zone 3. As such, the development of this site should reflect the sequential approach to flood risk management.</p> <p>Given that areas of the site are known to be at risk from flooding, and given the extensive areas of development and associated hardstanding being proposed, it is clear that there may well be issues in relation to flood risk generally, but more specifically in relation to surface water run off and localised flooding. This issue needs to be duly assessed in advance of the allocation of the site to ensure that the tests of soundness can be met.</p>
Transport	Whilst the allocation is located on the edge of the urban area it is not deemed to be well related to the settlement, and does not have good access to a number of key services, facilities and wider public transport links. Further, that in order to deliver the proposed allocation significant investment and improvement will be required on the wider road network. When factoring in the delivery of the allocation at Timperley Wedge (located adjacent to the site), it is clear that there will be a significant increase in traffic in the local area, increased

	<p>congestion, increased air pollution, increased noise and increased disturbance to an unacceptable degree.</p> <p>Furthermore, residents simply do not believe that the highway infrastructure in this locality (both local and motorway networks and junctions) can cope with the increased pressures being placed on them from the scale of development being proposed given the existing levels of congestion. This is supported at paragraph 10.2 of the Topic Paper which states that the development will have a material impact on the strategic and local road networks, both in isolation and in consideration of the cumulative impacts of JPA3.2, and at paragraph 10.8.</p> <p>The proposed mitigation is not deemed to overcome the principle transport objections to this allocation, and it is noted that delivery and cost (given the relationship with the adjacent proposed allocation) are yet to be confirmed, raising concern in relation to the viability and deliverability of this allocation.</p>
<p>Utilities</p>	<p>It is noted that there has been no engagement with utilities and power suppliers. Given the reliance on the fact that the site is earmarked to be delivered later in the plan period, this is simply unacceptable. If the site is being proposed for allocation, then the Inspector and third parties must be provided with all of the information they require to make a suitable assessment of the acceptability of the proposals. Failure to ensure that the site can be accommodated, nor that there are potential utility issues to be factored into the delivery of the site does not ensure that the site can be found to be suitable, available and deliverable. As such, the proposed allocation does not meet the tests of soundness.</p>
<p>Environmental</p>	<p>The site is within the Green Belt and will therefore result in the loss of in excess of 20 hectares of Green Belt. The Green Belt assessment confirms that the site performs well in relation to a number of the tests for land within the Green Belt including, in relation to checking the unrestricted sprawl of large built up areas, in relation to preventing neighbouring towns from merging and in safeguarding the countryside from encroachment. The loss of this Green Belt site will therefore result in harm, and harm which is not outweighed by the case being made for exceptional circumstances. The proposed allocation does not meet the tests for release as laid out within the National Planning Policy Framework and should therefore be deleted from the Plan.</p> <p>The scale and form of development being proposed within this allocation will also result in detrimental impacts on the visual amenities of the local area and on the character of the local landscape. The mitigation proposed to limit the effects of this development do not override the fundamental principle objections to the release of the site.</p> <p>The site is currently vacant greenfield with extensive areas of existing trees and hedgerows, that offer potential for protected species habitat. From a review of the documentation</p>

	<p>associated with the allocation it does appear as though this important issue has not been duly considered, with no detail provided on any assessments undertaken or the potential for species to be found within the allocation boundary. Failure to suitably consider and address the ecological and biodiversity impacts of the proposed release of this site cannot be deemed to be acceptable, and the site simply cannot be brought forward for development without some assessment of these important issues.</p> <p>The scale of development being proposed will result in increased vehicle movements and general activity in the local area. This will also then result in an increase in levels of air and noise pollution to an unacceptable degree. Once again these important issues do not appear to have been duly considered in the proposal to allocate the site, and the site is not therefore deemed to be suitable for allocation.</p>
Historic Environment	<p>It is noted that there are three Grade II listed buildings located within the southern portion of the site. Whilst the Topic Paper makes limited reference to these designated heritage assets at paragraph 20.1, there is noted to be no assessment of the impact of the proposed allocation on the setting of these structures, nor on the need for their retention etc. The report simply advises that further assessment is required. Given the scale of development being proposed, both independently on this site and on land adjacent, it is not acceptable to simply fail to assess the impact on designated heritage assets.</p> <p>It is noted that there is also the potential for archaeological finds within the site boundary, but again no detail has been provided in relation to the likely finds or the impact of the development on these important features.</p> <p>Put simply, once again insufficient information has been provided at this stage in the Plan process in relation to the impact on the historic environment to justify the development of this site. The proposed allocation should therefore be deleted from the Plan.</p>
Social	<p>The Topic Paper is not sufficiently clear in relation to the social benefits to be achieved from the development. Whilst it is accepted that this scheme relates to the creation of a Medipark, it does not address potential impacts on services and associated contributions and obligations required to deliver the development. These elements need to be factored into the assessment on viability at an early stage and should therefore be clarified in advance of the adoption of the Plan.</p>
Requirements to overcome constraints	<p>Investment is noted to be required in relation to transport. However, contributions and obligations on all other matters appear to be awaiting further detail.</p>
Planning History	<p>There is no known planning history of relevance to the allocation of this site.</p>

<p>Deliverability</p>	<p>Section E of the Topic Paper confirms that this site is not viable and will need to be delivered with ‘a significant ask of public investment in order to improve the surrounding transport infrastructure to the capacity necessary to deliver the site’. However, no detail has been provided as to where this funding will come from or whether it is available to deliver this site.</p> <p>The conclusion therefore must be reached that this site is not deliverable and is unviable and should therefore be deleted from the Plan.</p>
<p>Anticipated timeframe for availability</p>	<p>Not known</p>
<p>Commentary</p>	
<p>The proposed allocation will result in the loss of in excess of 20 hectares of Green Belt land, the proposal will therefore result in harm. The case for exceptional circumstances and not been sufficiently made to justify the release of land from the Green Belt, including this site.</p> <p>The allocation has not been supported with the necessary level of information and documentation as to warrant support for the proposal with a lack of detail on matters such as ecology, heritage, contamination etc. The proposal to develop the site has not therefore been robustly justified and will not meet the tests of soundness.</p> <p>The site is not well located for access to public transport and will result in significant increases in traffic in an area already challenged with congestion. The proposals is therefore unacceptable in relation to transport infrastructure and the extensive and costly mitigation proposed will not alleviate the concerns of local residents.</p> <p>The allocation has been shown to be unviable and is therefore not deemed to be deliverable or meet the tests of soundness. We therefore ask that the allocation be deleted from the Plan.</p>	

Site Assessment Simister and Bowlee

Site Plan



Image Source: PfE – Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 1.2		
Site Address	- land to north west of A6045		
Postcode	-	Site Area (HA)	74 ha
Description of Site	The site is located within the designated Green Belt as allocated within the adopted Development Plan.		
Current Land Use	Predominantly greenfield agricultural land with a small number of existing farm related buildings on site		
Brownfield/Greenfield	This is a greenfield site		
Surrounding Details			

Land Uses	The site is bounded to the west by the M60 Motorway, to the south by the A6045 and the settlement of Rhodes, to the north by the village of Simister and to the east by open countryside.
Character of Surrounding Area	Whilst there are some areas of built development on the southern fringes of the site, the main area is rural in character.
Constraints	
Policy Constraints	The site is located within the Green Belt as designated within the adopted Development Plan.
Ground Conditions	Indicative information suggests majority of site is uncontaminated but there remains potential for areas to be at risk including from landfill, ground gas, groundwater. In order to ensure that the site is suitable for development and deliverable it is important that further clarity is obtained on the extent of potential contamination and potential cost for remediation.
Flood Risk & Drainage	<p>It is understood that the majority of the site is located within flood zone 1. However, there are noted to be existing watercourses within the allocation boundary and ponds which could pose a risk. In addition, given the scale of development being proposed, the significant increase in the provision of hard surfacing there is a real danger that the site could result in flooding on adjacent sites and localised flooding as a result of increase surface water runoff.</p> <p>Paragraph 12.2 of the Topic Paper supports these concerns and also draw attention to potential issues on groundwater flooding.</p> <p>Given the need to ensure developments are proposed in the most appropriate and safe locations we consider that the important issue of flood risk should be given greater consideration at this stage of the Plan process in advance of adoption to ensure that the allocations are appropriate and deliverable. Leaving these issues to the design stage is simply inappropriate as they fall to the principle of development.</p>
Transport	<p>Paragraph 11.1 of the Topic Paper supporting this allocation makes it clear that in order to secure its delivery there is a requirement for significant investment in infrastructure including a wide range of public transport improvements. This seeks to support the case that as existing the site is unsustainable and not well related to an existing urban area or settlement. The site is not therefore deemed to be suitable for allocation.</p> <p>Paragraph 11.2 goes on to confirm that his development, both in isolation and in consideration of the cumulative impacts with other nearby GMSF allocations, is expected to materially impact both the strategic and local road networks. The Strategic Road Network (SRN) impacts are expected to be concentrated at M60 Junction 19 and M62 Junction 19, whilst</p>

	<p>the Local Road Network (LRN) impacts mostly impact the junctions on the A6045 Heywood Old Road.</p> <p>Having reviewed the proposed highways works and mitigation it is clear that significant investment and changes to the highway network will be required to facilitate and deliver this site. These works are of such a scale as to potentially render the scheme unviable. Furthermore, the works will have significant detrimental impact on existing residents from congestion and roadworks during construction, but also congestion, increase idling vehicles and increased travel times once the development is delivered. The investment in public transport provision is unlikely to be sufficient to mitigate these realistic concerns, particularly when factoring in the cumulative effects of all of the development prosed in the wider local area.</p>
<p>Utilities</p>	<p>The Topic Paper supporting the allocation of the site indicates that there aren't any utilities constraints to the delivery of the allocation. Whilst this may well be the case we would seek assurances as to the dialogue with statutory stakeholders in relation to capacity of the various networks to accommodate the gross scale of development being proposed within the immediate local area cumulatively and not simply on a site by site basis.</p>
<p>Environmental</p>	<p>This proposed allocation will result in the loss of approximately 74 hectares of Green Belt. This area of Green Belt currently performs strongly in relation to checking the unrestricted sprawl of large bult up areas and in preventing neighbouring towns from merging. The loss of this land from the Green Belt will therefore clearly result in harm which cannot be mitigated.</p> <p>The case for exceptional circumstance to release this site for development has simply not been made given the lack of suitable assessment of reasonable alternatives.</p> <p>The allocation falls within a number of landscape character areas including National Character Area (54), within the Manchester Pennine Fringe, within Simister, Slattocks and Heald Green, Fringe Settled Valley Pasture and Settled Farmlands. The character of the area is described within the Topic Paper at paragraph 18.3 and includes reference to undulating pastoral and rough grassland, existing mature vegetation including hedgerows and woodland blocks, tranquillity, scattered farmsteads etc. All of which will be destroyed should this allocation be brough forward for development.</p> <p>Views of the site can be achieved from a number of longer vantage points, as well as within the immediate locality. Given the scale, form and nature of development being proposed visual amenity will be detrimentally harmed by the delivery of this allocation. The landscape mitigation proposals will not address these fundamental concerns.</p> <p>The site is in close proximity to local nature reserves and there is a Site of Biological Importance in the eastern part of the</p>

	<p>allocation. The site provides a number of key habitats including wetlands, woodland, grassland etc all of which will be damaged and potentially lost through this scheme. This will have detrimental impacts on protected and priority species and wider ecological networks which have not been sufficiently addressed at this stage in the Plan.</p> <p>Given the scale of loss of existing vegetation and greenspace we do not agree that biodiversity net gain is an opportunity at this site. Further, it is noted within the Topic Paper at paragraph 191.0 that net gain will be sought but does not confirm that it will be delivered. This is contrary to current national planning policy and could render the allocation unsound.</p> <p>The impact from air and noise pollution both from the development itself and given the relationship between the site area and adjacent major highways is also of concern.</p>
Historic Environment	<p>There are no listed buildings understood to be within the site allocation area although there is a grade II listed building close to the northern boundary. The impact of the scale of development of the setting of this heritage asset is likely to result in a significant level harm.</p> <p>There are a number of other historic features within the site which need to be retained and protected.</p>
Social	<p>Any development within the proposed allocation site would need to assess the requirement for additional social infrastructure (education, healthcare etc). The impact of these contributions on the viability of the site also needs careful consideration to ensure that the allocation is in fact deliverable.</p>
Requirements to overcome constraints	<p>To deliver this allocation there are requirements for investment in the transport network, public transport provision, school places, health, historic assets etc. All of which could well have a detrimental impact on the viability and delivery of the site</p>
Planning History	<p>There are no known planning applications on the site of relevance to this assessment.</p>
Deliverability	<p>The viability of this site is noted to have been calculated with a 25% contribution towards affordable housing in Bury and at 7.5% of GDV in Rochdale. However, given the Places for Everyone Plan fails to confirm the parameters for the delivery of affordable housing across the Plan area it is unclear whether these calculations are based on accurate and realistic assumptions.</p> <p>Whilst the site is deemed to be viable by the GMCA there remain a significant number of issues which need to be factored in which could result in the site being found to be undeliverable.</p>
Anticipated timeframe for availability	<p>Not known</p>
<p>Commentary</p>	

This allocation will result in the loss of approximately 74 hectares of land from the Green Belt. This portion of Green Belt serves a number of strategic purposes and its loss will result in harm which has not been justified. Further, the case for exceptional circumstances to justify release are not deemed to be acceptable, particularly given the lack of assessment of reasonable alternatives.

The site both individually and cumulatively with other allocations proposed within the local area will have significant impact on the strategic and local highway network and will result in an increase on congestion, vehicles idling and concerns over highway safety. The site is not sustainably located and is poorly related to existing services and facilities.

There are concerns in relation to surface water flood risk, the loss of habitat, loss of trees and wider impacts on the local environment.

The allocation will result in detrimental impacts on visual amenity and damage views of the wider local area.

There remain outstanding concerns on the viability of the allocation and the resultant deliverability of this site. Therefore, for the reasons laid out above it is our view that this allocation should be found unsound and should be deleted from the Plan.

Site Assessment Stakehill

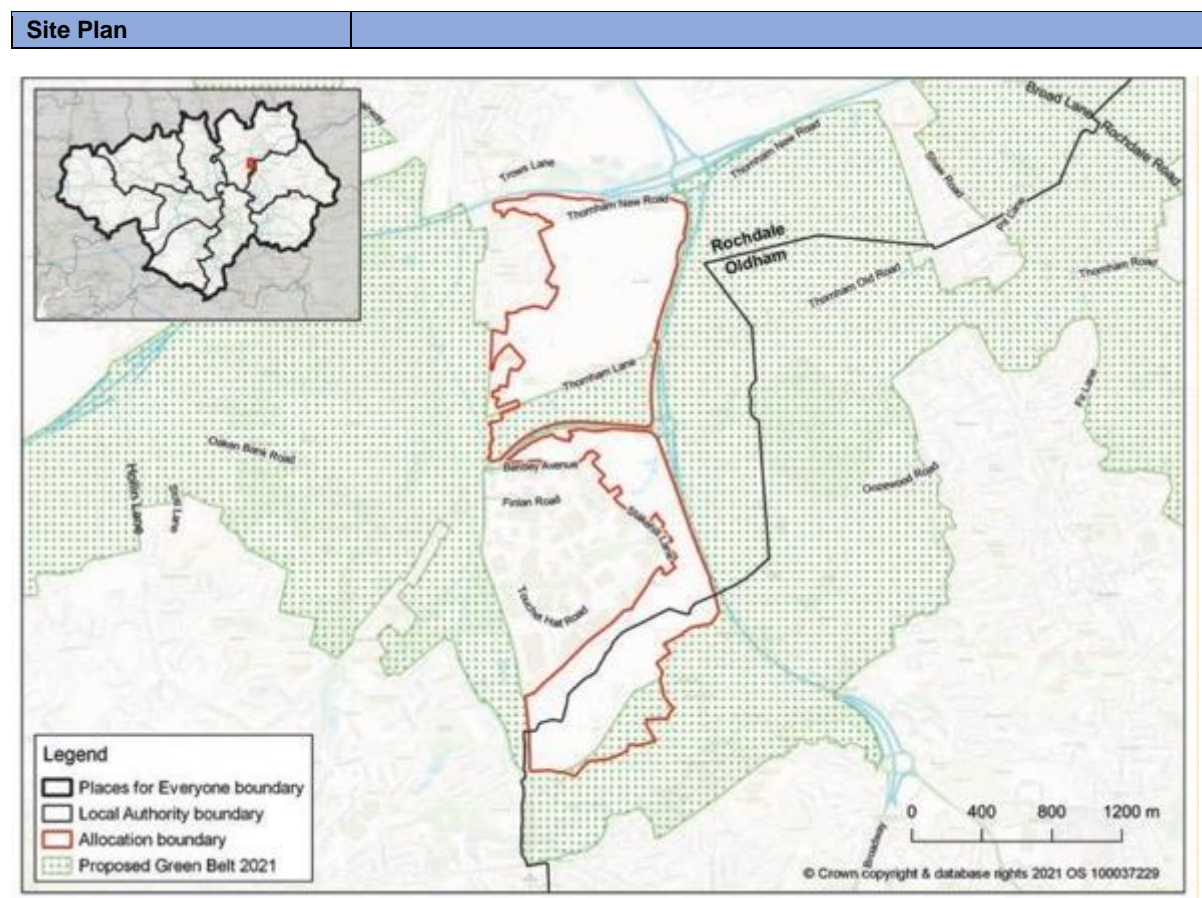


Image Source: PfE – Consultation Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 2		
Landowner	The Stakehill Allocation Topic Paper (SATP) fails to state who owns the land. Ownership is held by at least eight different landowners: three/four working farmers; a PLC; a family trust; three individuals/families and with key access (from the north) coming through the All-in-One Garden Centre		
Site Address	Split into North (bordered by M62 to north, A627M to east, A627M Slattocks Spur to south, A664 Rochdale Rd to west) & South (A627M Slattocks Spur to north, A627M to east, farmland towards Chadderton Heights to south, Rail line/Stakehill Ind Est to west). These should be presented as two separate sites split by the A627(M)		
Postcode	Various M24/OL11	Site Area (HA)	200 ha

Description of Site	The site is currently designated as Green Belt within the adopted Rochdale Core Strategy and Oldham Local Plan (currently being updated). The site is largely vacant Green Belt other than existing farmsteads and a garden centre business.
Current Land Use	Predominantly vacant Green Belt but with some scattered development as detailed above albeit limited to appropriate developments within the Green Belt and within a mineral safeguarding area. The land is Grade 4 agricultural land which is currently used for grazing and grass crops.
Brownfield/Greenfield?	Green Belt, other than the structures and uses referred to above.
Surrounding Details	
Land Uses	<p>The site lies between Royton and Middleton, across the boundary of the Oldham and Rochdale Local Authority Areas and 5km south-west of Rochdale and 5km north-west of Oldham. The site is around 200ha in size, and is split into two separate allocations north and south of the A627(M) Junction 2:</p> <ul style="list-style-type: none"> •GMA2 Stakehill (north): this part is 108.6ha in size and bounded by A627(M) to the south and east, M62 to the north and Manchester Old Road to the west. • GMA2 Stakehill (south): this part is 93.7ha in size and bounded by A627(M) to the north and east, Stakehill Industrial estate to the west and Chadderton Fold to the south. <p>The above is quoted directly from the SATP. It immediately refers to the site as “<i>two separate allocations north and south</i>”. Section 26 Phasing indicates a three-pronged approach to the JPA2.</p> <p>We submit that although agreeing there is a linked infrastructural element to JPA2 as a whole, along with upgrades/additions mentioned elsewhere, JPA2 should be seen as two/three separate allocations and dealt with accordingly. Policy JPA2, para 7, indicates the creation of a natural separation (Green Belt/wildlife corridor). This, along with the A627M Slattocks Spur, provide an obvious north/south divide to the allocation as proposed. This is not a sustainable location.</p>
Character of Surrounding Area	<p>The allocation whilst on the urban fringe with the settlements of Slattocks, Stakehill, Chadderton Heights, Boarshaw, and Chesham Estate, is rural in character.</p> <p>We submit that the natural separation of these settlements, and that at Thornham Fold, would be significantly compromised and is contrary to PfE plan paras 8.2, 8.56, 8.61, Policy JPA2 para 14, NPPF para 138b & c.</p> <p>We also submit that Thornham Fold will not be treated “<i>sensitively</i>” and there will be “<i>an unacceptable impact on</i>”</p>

	<p><i>local roads</i>" (NPPF para 85). The proposals would damage the identity of the existing settlements.</p>
<p>Constraints</p>	
<p>Policy Constraints</p>	<p>The site is within the Green Belt and borders (North section) a Grade II listed Church which is protected. This section also borders the Thornham Cricket Club which should be afforded protection as a sporting facility. Spatial Aspect: There are no exceptional circumstances to redraw Green Belt boundary in respect of JPA2 as Rochdale Council have failed to examine all the alternatives including:</p> <ul style="list-style-type: none"> • Optimising the density of developments: Rochdale are not building to the recommended densities in the sites within 400m and 800m of current transport hubs and town/local centres. • There is a significant 74 acre Brownfield site, the former Turner Newall Asbestos Ltd at Healey and desperately in need of remediation/regeneration. • JPA2 fails to comply with 6 of the 7 Site Selection criteria. It only complies with Criteria 7 Land that would deliver significant local benefits by addressing a major local problem/issue. • Building on this Green Belt site does not comply with promoting sustainable development, it is the complete opposite and causes multiple problems in the area • Loss of protected Green Belt including: <ul style="list-style-type: none"> ▪ Loss of public access to green space ▪ Increased congestion on roads. Peak period traffic is currently 900 cars/ hour. ▪ Increased urban sprawl by the addition of 1,680 houses & expansion of employment space. ▪ Significant deterioration in air quality near an AQMA and a primary school ▪ Increased pollution and CO2 from additional buildings and traffic ▪ Increased flooding risk ▪ Loss of a carbon sink ▪ Poor access to GP surgeries ▪ Risk of unsafe building on old mine workings ▪ Loss of ancient hedgerows ▪ Loss of habitats for wildlife <p>The NPPF para 120, Planning policies and decisions should: <i>"b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production,"</i></p>

	<p>We submit that proposed development at JPA2-Stakehill does conform with the NPPF as quoted.</p> <p>The SATP para 14.12 states “ <i>Whilst the assessment concludes that its release would result in some harm to the Green Belt the council’s consider that the benefits ... outweigh its overall harm, including its Green Belt harm, representing exceptional circumstances in accordance with national planning policy. The exceptional circumstances are set out in the Green Belt Topic Paper</i> “. We do not consider exceptional circumstances as per the NPPF para 137 have been demonstrated, specifically: <i>before concluding that exceptional circumstances exist ... all other reasonable alternatives have been explored for meeting identified needs for development ... Maximise opportunities on previously developed land and underutilised land ... Optimised densities on sites at accessible locations within the existing land supply.</i></p>
Ground Conditions	<p>The Northern section slopes downwards from the North & East with several undulations and gullies and currently comprises open fields with some limited buildings. It contains a number of ponds, some dating from 1600’s, a number of natural springs and field drains</p> <p>The allocation abuts a number of old mine workings which is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed.</p> <p>The potential for ground contamination particularly from adjacent uses and impacts on ground water and safety of the development on site need to be more carefully considered prior to the allocation of the site.</p> <p>The SATP para 12.2 states “... a <i>Preliminary Risk Assessment (PRA) would still be required to determine whether any further intrusive investigations are required to establish if and what remedial techniques are necessary to ensure the site is suitable for its intended end use. This would be a condition relating to any future planning approval</i>”.</p> <p>And para 12.3 “<i>The site promoters for the northern part of the allocation, which would be housing, ... recommends that a Phase II Geo-environmental Site Investigation is undertaken in order to qualitatively assess any potential contamination</i>”.</p> <p>Para 12.4 goes on: “<i>The site promoters for the land to the north and east of Stakehill ... recommends that further targeted investigations be carried out on parts of the site e.g. pond, motorway embankments and further areas that may have been backfilled.</i>”</p> <p>These measures should be undertaken prior to deciding if the allocation is viable and this lack of process does not offer confidence.</p>
Flood Risk and Drainage	<p>There are several natural springs, ponds, and field drains throughout the allocation site. Recent adverse weather</p>

	<p>events/conditions have seen areas adjacent to the site often flooded from both surface water run-off and higher than average water table levels. The limited flood risk assessment significantly underestimates reality and acknowledges further detailed survey work is needed. This ends up as regular spills from Church Avenue and Bentley Avenue onto the main A664 Rochdale Road and causing very difficult driving conditions at Slattocks Roundabout. Whilst drainage works have been undertaken at the roundabout the problem has not been resolved as proved following further heavy rainfall.</p> <p>Replacing the green fields which act as a soakaway with the hard standings for housing and impermeable roadways/pavements is likely to result in a significant increase in the severity of the flooding. Combined with an antiquated main sewerage/drainage system there is likely to be many more frequent incidences of flooding. If the natural soakaway is lost this will severely exacerbate the flooding which is already occurring regularly. Mitigation through the use of SUDS and semi-permeable vehicle standings will not adequately compensate. The proposed expansion of Stakehill Ind Estate will exacerbate the effects of water run-off significantly causing greater problems further down watercourses which continue through Manchester City Centre.</p> <p>The L1 Strategic Flood Risk Assessment for Greater Manchester states that Rochdale is amongst the worst areas for high flood risk.</p> <p>The SATP para 11.4 states: <i>“It was concluded that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage”</i>. This leaves questions about the viability of this site unanswered so its inclusion in the PfE plan is unsound. It is of vital importance that detailed investigation, modelling and master planning needs to be undertaken prior to any development. A desktop survey and “look at it later” attitude is not satisfactory when producing plans of this scale.</p> <p>Whilst the indicative plans for the allocation show some mitigation measures (SUDS, permeable vehicle standings – for houses, etc) it remains unclear whether these will be sufficient.</p> <p>Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed, and the concerns of surface water flooding with the significant increase in hard standing on industrial section of the allocation.</p> <p>Data warns of more frequent flooding events UK extreme events - Heavy rainfall and floods - Met Office.</p>
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Transport	<p>The allocation currently has limited accessibility to public transport within the designated parameters. The existing junction of the A627(M) is already rated as poor. The investigation of a new rail station at Slattocks is welcomed but is being used to justify the scale of development as, only when it is a reality, can the allocation be said to be properly accessible and within the criteria used in GMAL calculations. We submit that the use in GMAL of the boundary of the allocation site as a 'distance to' public transport access points is unrealistic and inappropriate. It uses a straight line to/from those points. These are unrepresentative of real-life conditions and could see commuters' journey distances/times to the nearest access point increased dramatically. They should therefore be recalculated for factual authenticity.</p> <p>There is no rail (proposed station) or Metrolink to the area, very limited bus services (particularly Southern employment section) and the local highway network is already severely congested at peak times. Local traffic based on 1,680 homes, suggests anywhere between 1,500 to 4,000 extra private vehicles given the scale of housing & employment space proposed. This will further increase with deliveries to properties and HGV movements to the expanded employment site.</p> <p>Many parents will drive their children to school due to time constraints/safety issues. The proposal to increase the bus service to Stakehill Ind Est is an aspiration with no evidence this will definitely happen.</p> <p>The Transport's Locality Assessment Addendum-Cross Boundary-Stakehill (TLAA-CB-S), shows that pre (Table 8) and post mitigation measures (Table 10), which are merely suggestions, traffic (M62 J20, A627M/A664 Slattocks, A627M/Broadway/Chadderton Way) will continue to be over capacity 'limits' at peak times. Para 12.1.11 states <i>"further modelling work will be required to support the Transport Assessment for the allocation..."</i> whilst Para 12.1.6, in relation to junction capacity, states <i>"a figure of 100% or over illustrates that flows exceed the operational capacity at the Junction and increased vehicle queuing and delay are likely to occur"</i>. This is the case pre and post mitigation.</p> <p>Further strain and knock-on effects will result to the Local Road Network (LRN) on the A664 (North & South) and A6064 from JPA1.1 & 1.2, JPA Castleton Sidings, and JPA25 Trows Farm. This is in addition to other (non-PfE) planned developments in Castleton (Royle Road, Nixon St/Carcraft – circa 300 homes). Furthermore, the proposed cycle lane will narrow the highway through Castleton centre causing a potential traffic bottleneck on the principal route between Rochdale & Manchester. These issues should be addressed as a matter of urgency before this site is given further consideration</p> <p>TLAA-CB-S (para 4.3) suggests <i>"a new southerly link to Mills Hill station could form part of any expansion of the</i></p>
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	<p><i>industrial estate</i>". No modelling or associated investigations are presented for this.</p> <p>The TLAA-CB-S (para 9.1.4) uses a number of irrelevant junctions in its assessment. Ref 7- Boarshaw Lane/Stakehill Lane is immediately dismissed.</p> <p>Ref 6-Thornham Old Road/Oldham Lane would not be used as access to JPA2-Stakehill. It is an unadopted Public Bridleway, principally providing access to local farms at Thornham Fold, East of the allocation.</p> <p>The document also references 'Proposed para 6.1.4 "<i>Resurfacing of the unpaved sections of Boarshaw Lane and Thornham Lane is also proposed</i>". No sections of either of these Lanes is currently paved.</p> <p>Frequent issues (accidents/closures) on the SRN M62, J18-21 cause major problems on the A58/A664 around Castleton and other parts of the LRN through Middleton, Heywood, Milnrow, Newhey, Shaw, and Royton.</p> <p>TLAA-CB-S Section 7 - Parking, notes that Rochdale & Oldham are yet to agree on parking standards for developments.</p> <p>TLAA-CB-S Section 8 - Allocation Trip Generation and Distribution, Table 4, shows a 'Development Quantum' residential build to 2025 of only 55 homes and a total of 1,736. This total figure does not match the allocation proposals of 1,680 and no explanation is given for the difference.</p> <p>Table 5 - Allocation Traffic Generation only gives figures for passenger cars "<i>Units are in PCU (passenger car units/hr)</i>". This excludes commercial vehicle movements.</p> <p>The proposed expansion of Stakehill Ind Estate and potential inclusion of a lorry park (Policy JP Allocation 2, para 13), by over 150% would result in a significant increase in commercial vehicles entering/exiting the LRN and SRN. This would all use the Slattocks Roundabout junction (no other entry/exits are planned for) further contributing to traffic movements and potential congestion issues.</p> <p>The first sentence of TLAA-CB-S para 9.13 makes no sense – it is just wrong.</p> <p>TLAA-CB-S para 10.1.3 makes irrelevant mention of JPA16-Cowlshaw. Its location would not be expected to have any effect on traffic in/around JPA2-Stakehill.</p> <p>TLAA-CB-S para 14.1.3 states "<i>Junction modelling has however demonstrated that the Junction will operate within capacity at 2040.</i>" There is failure to explain how this conclusion has been reached.</p> <p>TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the "<i>17A serves Stakehill in peaks</i>". It is a single time service at approximate 05.30 Monday to Friday only.</p>
Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development</p>

	<p>being proposed. This clarity has not been provided in relation to this site and is therefore the allocation fails the test of soundness.</p>
<p>Environmental</p>	<p>The site will result in the loss of 167.4ha of Green Belt. The site is noted to perform strongly in relation to a number of purposes for allocating land as Green Belt and the Green Belt harm assessment is noted to conclude that the allocation site plays a moderate to relatively significant role in respect of checking the unrestricted sprawl of the large built-up area and preventing encroachment on the countryside.</p> <p>The Stakehill Allocation Topic Paper, Section C- Environmental (14 Green Belt Assessment), confirms, throughout the Section, that “<i>The assessments considers that release of the allocation would cause ‘high’ harm to Green Belt purposes, but would only have a ‘minor’ or ‘no/negligible impact on adjacent Green Belt.’</i>”</p> <p>The allocation is close to Tandle Hill Country Park which provides a highly attractive local viewpoint and whose visual amenity is likely to be detrimentally affected by the development of this site. The proposed mitigations are unlikely to fully mask the development.</p> <p>In relation to ecology, it is noted that the GMCA’s appraisal indicates that any ecological constraints on the site are unlikely to be significant but further surveys are required. It is our view that the evidence base on this important issue is somewhat lacking and is not robust enough to currently warrant allocation of the site.</p> <p>The resultant harm from the release of this Green Belt is significant and the use of ‘exceptional circumstances’ (NPPF para 61 & 160) have not been demonstrated to justify the allocation of this site. Increased urban sprawl in contravention of NPPF para 141. The impact on air pollution and noise pollution from the extensive additional traffic resultant from this development is also of concern to local residents both in its impacts on future residents and on those in the local area. Coupled with this is the fact that there is an AQMA outside a primary school within 150m of the southern end of the site allocation. This will be exacerbated by the fact that proposed residents are likely to need to travel by private car to access key services and facilities etc due to this being an unsustainable development.</p> <p>We welcome the Plan’s aim contained in Policy JP-S 2 Carbon and Energy. However, its emphasis is on housing and suggests there is insufficient focus on industrial, who are higher-level users of energy. Businesses should be encouraged to use green technologies such as PV/air/ground-source heating and/or green roofing. Green roofs have the added advantage of masking large distribution-type units from distant/high viewpoints. Using PV on roofs means that green fields are not needed for</p>

	<p>this purpose, as has been seen across the UK, leaving them available for agriculture/leisure/environmental functions.</p>
Historic Environment	<p>The Topic Paper draws attention to a Historic Environment Assessment created to support the Plan. This sets out a number of recommendations for this allocation including on archaeology and the need to protect existing sites and assets. The need to protect the historic environment from inappropriate development needs to be clearly addressed prior to allocation of the site. Without detailed knowledge of what the site contains and associated impacts on the historic environment should assets be found then the site should not be promoted as identification could make the site un-deliverable.</p> <p>The loss of fields, hedges and trees across the allocation will have a negative impact on the local green infrastructure. The majority of this land has been farmed for centuries and the fields, paths and hedgerows are relatively unchanged from early maps. They form an intrinsic part of the character of the area and help delineate the existing settlements from one another. The GMA2 - 4 Stakehill (North) Ecology report states that further in-depth assessments need to be undertaken. This should be done prior to further consideration of this allocation site.</p>
Social	<p>The development on the Northern section of the allocation will adversely and significantly impact on the setting of the 150+ year old Thornham Cricket Club, reducing its natural rural outlook.</p> <p>The COVID-19 pandemic has meant that the public footpaths and byways across the area have seen significantly increased usage. Whilst this has declined, it remains at higher than pre-COVID levels (anecdotally). It contributes to the physical and mental health and well-beings of both local residents and visitors to the area.</p> <p>This is in contradiction to Policy JP-P 6: <i>“To help tackle health inequality new development will be required, as far as practicable, to:</i></p> <p><i>A. Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;</i></p> <p><i>B. Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice.”</i></p>
Requirements to overcome constraints	<p>Proposed expansion of primary schools in the local area is limited to St John’s CofE on Thornham Lane. This school has just (September 2021) completed a building reconfiguration/expansion. Further expansion would again create additional disruption to the education of its pupils.</p> <p>There is no mention of increasing capacity at other schools close by and no solid mechanism for improving service provision to support the proposed development.</p> <p>Secondary schools are full. This development will only</p>

	worsen existing pressures. This applies in equal weight to existing health care services. The nearest GP surgeries are under strain, which will only increase with the proposed increases to the local population. A national shortage trained GPs is a known fact. (Chronic shortage of GPs is the reason patients are facing long waiting times for appointments (rcgp.org.uk)). Thus in the short/medium term “ <i>the provision of additional ... medical facilities</i> ” could remain an ambition rather than reality.
Planning History	There have been a number of small-scale planning applications (house extensions; repurposing farm buildings; changes/upgrades to industrial units on Stakehill Ind Estate; extension at Thornham Cricket Club). The site is virtually all undeveloped Grade 4 agricultural land adjoining farm buildings/businesses.
Deliverability	<p>Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. Access to the Northern section of the site via the secondary route, Thornham New Road, is made difficult by the narrowness of the roadway. No mitigation has been proposed for this.</p> <p>The possibility of a new rail station at Slattocks is not certain. Further modelling and the securing of funding needs to be undertaken prior to the development going ahead.</p> <p>There appears to have only been a desktop flood risk assessment along with a very limited wildlife study – desktop and one day on-site visit – which give an incomplete description of the actual situation. Current traffic issues have not been taken into account and will not be addressed by PfE.</p> <p>There is potential for regionally significant archaeological remains within the site. A full report on the ecology has been deferred.</p> <p>Local flooding, ground conditions, and the geology of the area has received a scant consideration and should be fully investigated prior to further progress towards proposed development.</p> <p>Local Housing Need is being overridden by the proposal.</p>
Anticipated timeframe for availability	Unspecified although the transport modelling is noted to relate to the period 2025-2040
Commentary	
<p>This allocation will result in the loss of a large area of Green Belt and the resultant harm is deemed to be significant. The GMCA have not presented a sufficiently robust argument to make the case for exceptional circumstances and as such it is our view that the site should not be being released for development.</p> <p>There are significant concerns in relation to traffic levels and impact on the safety of the highway, as well as concerns on congestion, air pollution and general noise and disruption.</p>	

The site may have archaeological value and does have an ecological significance, neither of which have been robustly addressed within the supporting documentation.

In short, the proposed allocation of this site has not been robustly supported with a suitable evidence base or sufficient justification provided in relation to exceptional circumstances for release. The allocation is therefore likely to be found to be unsound.

Site Assessment Timperley Wedge

Site Plan

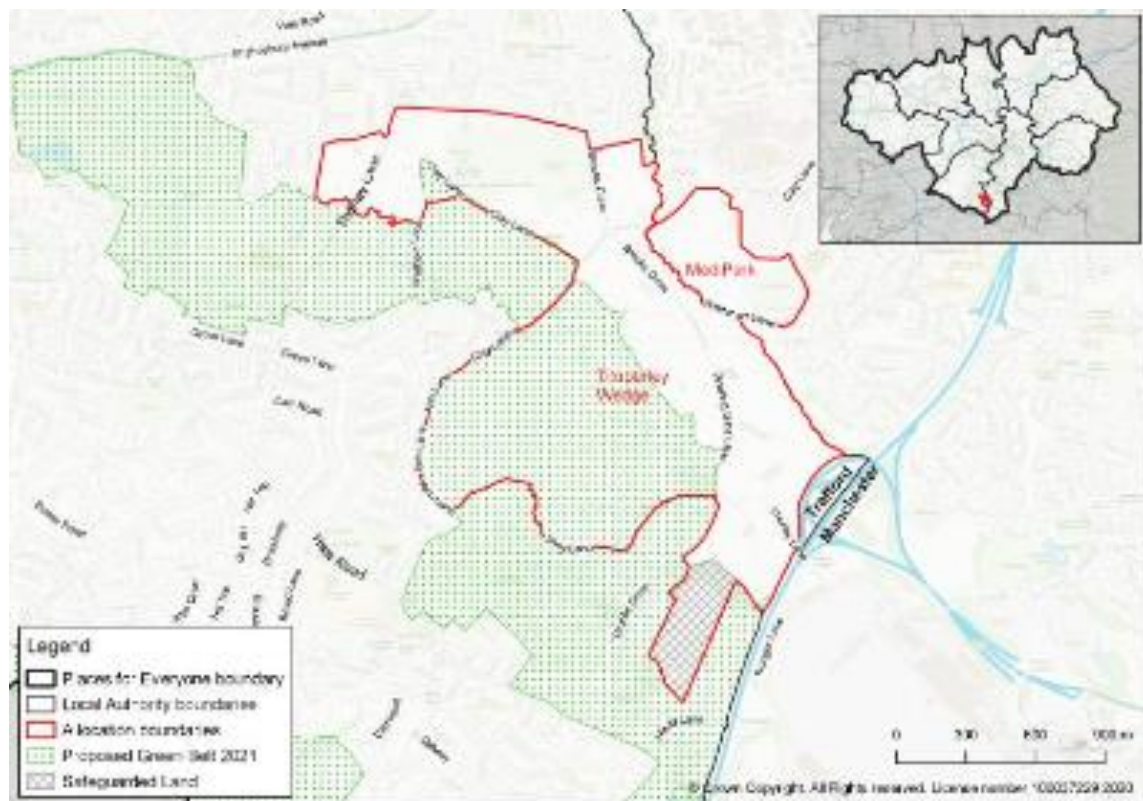


Image Source: PFE – Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 3.2		
Site Address	- land to east of Ash Lane, Trafford		
Postcode	-	Site Area (HA)	226 ha
Description of Site	The majority of the proposed allocation is understood to be located within the Green Belt and is mostly vacant greenfield land		
Current Land Use	The site is mostly vacant greenfield land with a small proportion of existing built development including airport car parking, garden nursery land, Hale Country Club, playing fields and Altrincham Masonic Hall		
Brownfield/Greenfield	The site is mainly greenfield with small areas of existing built development.		
Surrounding Details			
Land Uses	The settlement of Hale Barns is located to the west of the proposed allocation, Timperley is located to the north, Manchester Airport is sited to the south and the proposed		

	allocation of the Medipark on current greenfield is located to the east.
Character of Surrounding Area	Whilst the adjacent land uses described above give an impression of an urban landscape character, it is important to stress that it is simply as a result of the gross scale of development being proposed in this location that the site is bounded by built development. As can be noted from a review of the site currently, it is clear that the site and surrounding areas are rural in character.
Constraints	
Policy Constraints	A large portion of the site is located within designated Green Belt. There are Sites of Biological Interest (SBI) within the allocation boundary, as well as a wildlife corridor and protected open space. It is understood that 36 hectares of land at Davenport Green are allocated for high quality office development.
Ground Conditions	<p>It is noted that the Topic Paper states that the land is broadly flat. Moreover, the land is primarily greenfield and has been used for agricultural or sporting facilities such that it is not anticipated that there will be any constraints associated with pollutants. Detailed assessments of the ground conditions will be undertaken prior to the submission of any future planning application(s).</p> <p>In our view given the gross scale of development being proposed this is simply not an acceptable level of detail and documentation to justify the allocation of this site. A more thorough assessment of potential contamination and geological issues should be undertaken in advance of allocating the site to ensure that it is safe, suitable, deliverable and viable. Failure to do so could render the proposed Plan unsound given the lack of justification and failure to demonstrate the deliverability of the policies and allocations.</p>
Flood Risk & Drainage	<p>It is understood that the majority of the site is located within flood zone 1 with some areas located within flood zones 2 and 3, although it is noted that these will be protected from development and used for parkland. Confirmation is sought however that this is an acceptable use of land given the potential increase in usage as open space and the danger of flood storage in this location to public safety and well being.</p> <p>There also remains significant concern in relation to the gross increase in surface water run off resultant from this allocation, and the potential for localised flooding and surface water flooding within the wider local area.</p> <p>At this stage we consider that insufficient information has been provided in relation to flood risk and drainage to justify allocating this site for development. Without further clarity on these important issues both in relation to addressing residents concerns, but also demonstrating that the site is safe, suitable and deliverable the site should not be being promoted for development.</p>

Transport	<p>Whilst the allocation is located on the edge of the urban area it is not deemed to be well related to the settlement, and does not have good access to a number of key services, facilities and wider public transport links with the airport being located on the opposite side of the motorway for access to train and bus links. Further, that in order to deliver the proposed allocation significant investment and improvement will be required on the wider road network. When factoring in the delivery of the Medipark (located adjacent to the site), it is clear that there will be a significant increase in traffic in the local area, increased congestion, increased air pollution, increased noise and increased disturbance to an unacceptable degree.</p> <p>Furthermore, residents simply do not believe that the highway infrastructure in this locality (both local and motorway networks and junctions) can cope with the increased pressures being placed on them from the scale of development being proposed given the existing levels of congestion. The material impact of this allocation and the adjacent Medipark was correctly summarised at paragraph 10.2 of the Topic Paper for the Medipark site which states that the development will have a material impact on the strategic and local road networks, both in isolation and in consideration of the cumulative impacts of JPA3.2.</p> <p>The proposed mitigation is not deemed to overcome the principle transport objections to this allocation, and it is understood that questions remain in relation to delivery and cost (given the relationship with the adjacent proposed allocation) are yet to be confirmed, raising concern in relation to the viability and deliverability of this allocation.</p>
Utilities	<p>It is noted that United Utilities have had direct input into the proposed masterplanning process. Further, that there will be limitations on the height of proposed buildings given the proximity to the airport. However, the proposed allocation is not supported with detailed justification that the scale and form of developing being proposed can be accommodated within the existing utility frameworks, nor to ensure that existing residents supplies will not be interrupted or affected by the development.</p>
Environmental	<p>The proposed allocation will result in the loss of land from the Green Belt, some 100 hectares, and will therefore result in significant harm.</p> <p>It is noted that the Green Belt assessment supporting the Places for Everyone Plan indicates that this parcel only performs strongly in relation to checking the unrestricted sprawl of large built up areas, with other purposes being moderate or weak. Whilst we would agree that the site does result in preventing unrestricted sprawl, we also consider that the site will prevent neighbouring towns from merging and will safeguard the countryside from encroachment. In reality is that the delivery of this scale of development will simply result in</p>

	<p>the coalescence of a number of settlements and the extension of urban mass into the countryside. This is wholly unacceptable and has not been justified with sufficient exceptional circumstance.</p> <p>Whilst the retention of areas within the allocation as Green Belt are welcomed, we do not consider that these areas need to be included within the allocation red line in order to ensure their protection for the future. The inclusion of these areas within the red line give the impression that they will be brought forward for development at a later date. We would also therefore ask that the proposal to safeguard some portions of land within the Plan be deleted to ensure communities have certainty over the areas where development will come forward during the life of the Plan.</p> <p>Given the scale of the proposed allocation and associated development, it is clear that the proposals will have a detrimental impact on the local landscape and visual amenities. With views from neighbouring land destroyed through the delivery of an overbearing and over dominant scheme.</p> <p>The loss of existing greenfield and vegetation on ecological networks and protected habitats will be significant, as will the impact on the SBI and local wildlife corridor. The proposed mitigation and case in favour of the development simply do not overcome these fundamental issues with the development.</p> <p>It is clear that the scale of development being proposed, along with the associated increase in general vehicle movements etc will significantly increase air and noise pollution within the local area to the detriment of residents health and the wider local environment. The relationship with the existing motorway network and the airport only exacerbates these concerns for both existing and proposed future occupiers.</p>
<p>Historic Environment</p>	<p>There are noted to be a number of listed buildings within the allocation boundary and on adjacent land. The documentation supporting the allocation simply do offer sufficient assurance sin relation to the impact of the proposed development on the setting and character of these important assets. The allocation given its sheer size will result in harm for which wider public benefit has not been justified.</p> <p>The impact on archaeology is also noted to require further assessment.</p>
<p>Social</p>	<p>It is noted that there may be a potential requirement for a financial contribution towards school places in order to help to address the stress being placed on local services by the proposed development. Whilst this is understood to assist in the short term, it is noted that a new primary school will need to be developed at a future date, this only seeks to support the concerns of local residents that the scale of development will result in pressure on existing school provision. Residents do</p>

	<p>not therefore agree that there will be no need for additional secondary school provision.</p> <p>Whilst the site is well located for access to Wythenshawe Hospital, it is clear that existing NHS services are already under extensive pressures following the pandemic, and as such any additional pressures from this scale of development is likely to be too much for this existing service to cope. This will place additional burden on already stretched local health services and will impact further on waiting times for existing residents.</p>
Requirements to overcome constraints	<p>Pressure on existing environment and infrastructure may require site to provide:</p> <ul style="list-style-type: none"> • new and/or improvement of existing open space, sport and recreation facilities – where would these be provided; • infrastructure (above and below ground) across the whole site; • additional school places through the expansion of existing facilities or new provision of new school facilities; • appropriate health and community facilities <p>Also requirements for:</p> <ul style="list-style-type: none"> • transport infrastructure
Planning History	<p>It is noted that the planning history for the allocation is included at paragraph 6.2 of the Topic Paper and includes applications for airport car parking, residential applications (most of which were refusals), and planning permission for serviced accommodation</p>
Deliverability	<p>Whilst the site is indicated to be viable at section E of the Topic Paper, it is noted that this is based on standard development costs, fees etc. However, as a result of increased construction material costs etc there is concern that the assessment may be unrealistic.</p> <p>Further, in relation to the Medipark site it is noted that the costs of the transport improvements are to be split across the two sites, with some public monies likely to be required to deliver the site. Therefore, there remain a number of additional factors on this development which could undermine the viability and deliverability of the site, and which justify further assessment.</p>
Anticipated timeframe for availability	<p>Not known</p>
<p>Commentary</p>	
<p>This allocation will result in the loss of 100 hectares of Green Belt land. This will result in the coalescence of a number of villages within Trafford and the mass extension of the urban area into the countryside. This scale of release will result in significant harm for which insufficient justification has been provided in relation to exceptional circumstances.</p>	

The allocation and Plan as a whole therefore fails to meet the tests laid out within the National Planning Policy Framework and as such the allocation should be deleted.

The gross scale of development being proposed will result in detrimental impacts on the local highway network, and on the motorways and motorway junctions in the local area. The proposed mitigation has yet to be able to demonstrate that (1) it is sufficient and (2) deliverable. In reality, this development will exacerbate an already congested road network and result in detrimental impacts on highway safety and traffic levels to an unacceptable degree.

The development will obliterate the existing greenfield and result in loss of vegetation and habitat and destruction of the wildlife corridor and damage to the SBI. The scheme will increase air and noise pollution and will therefore result in detrimental impacts on the local environment.

The development will result in harm to a number of designated heritage assets and will have detrimental impacts on the amenity of neighbouring properties.

There remain significant concern as to the viability and deliverability of this allocation.

The proposed allocation is therefore deemed to be wholly unacceptable, does not meet the tests of soundness as it has not been justified and is not effective, and the allocation should therefore be deleted from the Plan.

Appendix 6 Site Assessment of Proposed Allocations within Oldham

Site Assessment Beal Valley

Site Plan

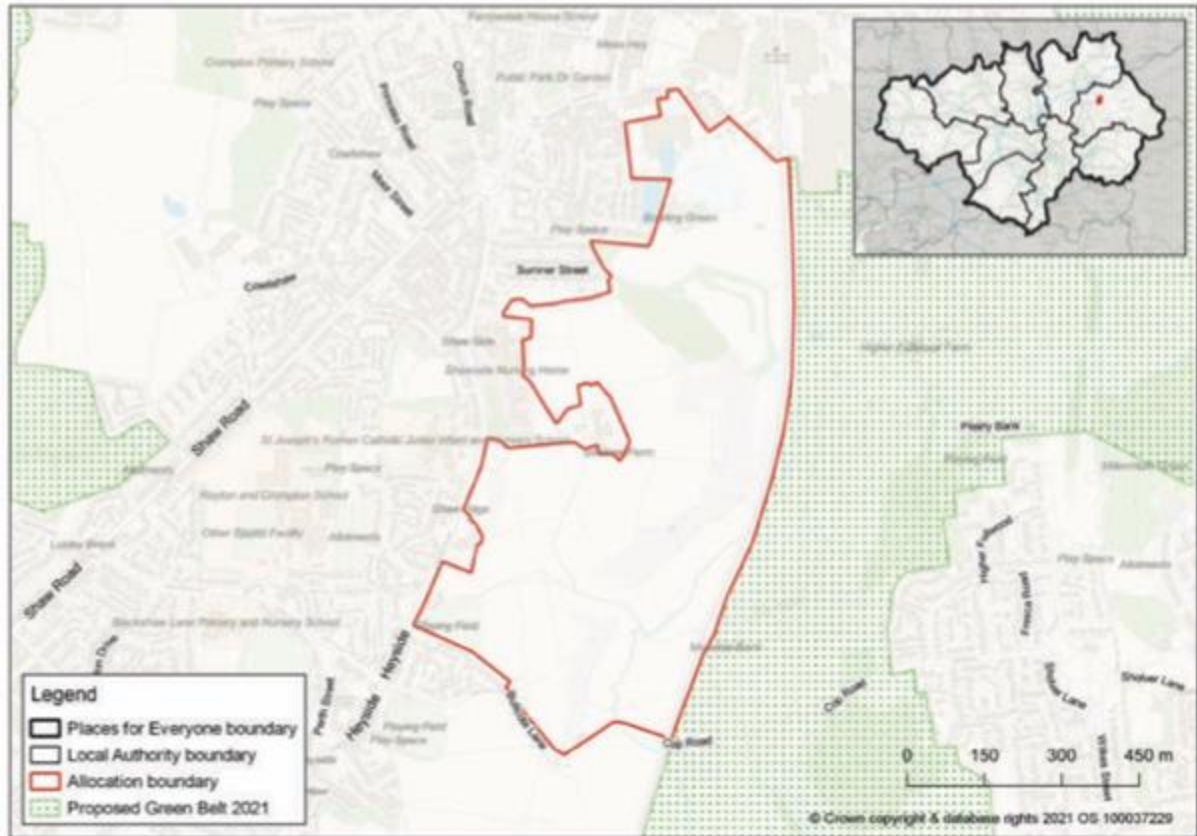




Image Source: PFE – Consultation Report 2021



Site Details			
PfE Reference	JP Allocation 12		
Site Address	- land to east of Birshaw Farm		
Postcode	-	Site Area (HA)	51.2 ha

Description of Site	<p>Site is currently designated as Other Protected Open Land (OPOL) and Green Belt in the Oldham Local Plan – designation anticipates development on the western side and retention of a green wedge on the east. Broadbent Moss allocation to the south (allocation ref 14)</p> <p>The topography is dominated by a prominent hill within the centre of the area, with the steeper side dropping towards the River Beal and part of Shaw Moss located within the land allocation, there are peat deposits in the northern, lower lying areas</p>		
Current Land Use	Predominantly greenfield agricultural land with two small commercial areas to the north/north west corner		
Brownfield/Greenfield	All greenfield excluding the small brownfield area to north/north west corner		
Surrounding Details			
Land Uses	Shaw to west, open space to south and east		
Character of Surrounding Area	Urban to west, rural to south and east		
Constraints			
Policy Constraints	Designated as Other Protected Open Land (OPOL) and Green Belt		
Ground Conditions	Indicative information suggests the majority of the site is uncontaminated but as a large proportion is industrial and landfill there will be a requirement for detailed site investigation and remediation works.		
Flood Risk & Drainage	<p>Northern portion of the site includes an area of Flood Zone 2 and the eastern boundary and SE Corner are in Flood Zone 3 (EA flood zone map extract below).</p> 		

	<p>Site is also in an ‘Outer Zone’ (Zone II) groundwater source protection zone along its eastern boundary (see extract from MagicMap below).</p> 
<p>Transport</p>	<p>Enhancements are required to facilitate improved access, particularly to the south of the site in terms of pedestrian and cycle access, and to the Shaw Metrolink stop which forms part of the Broadbent Moss allocation (ref 14 – immediately to the south).</p> <p>Various vehicular and pedestrian access points are potentially available to the west and a new link to the south would be required – access to east not possible due to presence of metrolink</p>
<p>Utilities</p>	<p>There is currently a lack of utility infrastructure provision across the Site and it will be necessary for preliminary investigation to be undertaken to assess whether there is capacity in the surrounding network to accommodate the scale of development suggested in the allocation.</p> <p>The metrolink line is a potential physical and logistical barrier to running services from the east.</p>
<p>Environmental</p>	<p>As Green Belt, predominantly green field land, any development within the proposed allocation area will have an impact on the existing site environment.</p> <p>The assessment acknowledges that the release of the land from the Green Belt would constitute high harm to the purposes of the Green Belt – the mitigation proposed is not of substantial weight to justify the harm. The majority of the proposed mitigation could be implemented without the need to release the land for housing (such as strengthening the boundary through planting trees which could be undertaken on the existing boundary line if it is considered to be of such</p>

	<p>importance) and is only required due to the proposed release and use for housing.</p> <p>The assessment itself considers there to be cumulative harm for which there is no justifiable reasoning other than to allow for the development of additional homes, the focus of which should not, in the first instance, be Green Belt release.</p> <p>The landscape character assessment suggests that there would be significant mitigation required to facilitate the release of the land for housing and that there would still be an impact of medium sensitivity.</p> <p>The topography of the site presents significant constraints to development.</p> <p>It is acknowledged that much of the site is marshy grassland and contains environmentally sensitive areas including sites of biological importance (SBI), tree preservation orders (TPO) and other protected open land (OPOL). The marshy nature suggests that there would be need for a detailed drainage strategy on a large scale. The implications of the drainage required would need to be considered in terms of the long terms effects it will have on the sensitive environmental areas and this should be assessed in advance of allocating land for development.</p> <p>There is insufficient evidence to be able to accurately assess the direct impact of any development on protected species.</p> <p>The proposals indicate that the metrolink line to the east of the allocation will become the new Green Belt boundary.</p>
<p>Historic Environment</p>	<p>No LB's, SAMs or CAs on the site although there are a number in close proximity that may be impacted by development within their setting.</p> <p>There is high potential for archaeological remains, particularly from the Prehistoric, Post-Medieval and Industrial periods, therefore further archaeological work is recommended (source: Oldham Historic Environment Assessment 2019) which needs to be given more consideration.</p>
<p>Social</p>	<p>Any development within the proposed allocation site would need to assess the requirement for additional social infrastructure (education, healthcare etc).</p>
<p>Requirements to overcome constraints</p>	<p>Pressure on existing environment and infrastructure may require any development at the site to provide:</p> <ul style="list-style-type: none"> • new and/or improvement of existing open space, sport and recreation facilities; • infrastructure (above and below ground) across the whole site;

	<ul style="list-style-type: none"> • additional school places through the expansion of existing facilities or new provision of new school facilities; • appropriate health and community facilities <p>Also requirements for:</p> <ul style="list-style-type: none"> • green infrastructure and preferably a joint approach to ecological enhancement with Broadbent Moss (ref 14)
Planning History	<p>PA/343501/19 – NE corner, reserved matters for 65 dwellings pursuant to outline permission PA/331731/11</p> <p>PA/344572/20 – NE corner, 65 dwellings permitted and conds appear to have been submitted for discharge</p>
Deliverability	<p>Only 21 of the 53 ha suggested for Green Belt release is proposed to be developable.</p> <p>Not known although the initial viability assessment indicated that development would not be viable.</p> <p>Blanket values of £250,000 per ha were applied across the whole of Greater Manchester.</p> <p>The viability assessment considered the anticipated scale of development could provide only 14.9% affordable housing and that strategic transport and infrastructure costs would be high. Factors including the overall net developable area and the likely high abnormalities that would be associated with mitigating constraints such as ecology, topography and drainage would significantly influence the deliverability of any development.</p>
Anticipated timeframe for availability	Not known
Commentary	
<p>Expected to deliver around 480 homes on the greenfield element of the Site – allocation includes some brownfield to the north but this is already accounted for in the SHLAA.</p> <p>Potential for contamination from landfill and industrial use raises questions about the suitability of the site for a high risk use such as residential.</p> <p>Topography may have implications for viability.</p> <p>Net developable area will be impacted on by need for ecological and flood risk mitigation – this should have been considered in advance of setting an indication of predicted residential unit yield.</p> <p>The site is in a groundwater source protection zone, the extent of any development needs to account for this.</p> <p>The transport impact of developments has been considered against a backdrop of proposed enhancement measures set out in the Greater Manchester Transport Strategy 2040, the implementation of which is not guaranteed and therefore there is a potential flaw in the assessments. The statement that ‘Sites that have been selected for inclusion in the Joint DPD have been found to be suitable from a transport perspective and satisfy the</p>	

requirements of NPPF in that they do not place an unacceptable impact on highway safety or severe impact on the road network' (Para 10.7) cannot be so definitive without the anticipated baseline being secured and this is confirmed in the following paragraph which states 'For some allocations it is recognised that there is further work to be done in order to develop a solution that fully mitigates the site's impact on the transport network' (Para 10.8). The proposed access point to the south provides no footpath for pedestrian access and there appears to have been no assessment to ascertain whether there is sufficient land available to facilitate such provision, which would almost certainly be required for the quantum of development being proposed – although the suggestion is to close it to through traffic for vehicles this does not appropriately address the pedestrian connectivity issues – reliance on the implementation of the Bee Network is not appropriate to sufficiently address the safety concerns.

There is no justification for the release of 53 ha of Green Belt land and there is no overriding benefit to offset the acknowledged harm. Although no Green Belt should be lost, if only 21 of the 53 ha is going to be subject to development, the release of the a substantially larger area will only result in future pressure for development on the remaining land at the potential cost of any mitigation secured.

Having regard to the environmental constraints of the site, much of the allocation would be required to remedy the harm that would be caused by residential development – it is not appropriate to release land from the Green Belt solely for a large proportion of it to become a mitigation buffer.

The SBI is already highlighted as a significant constraint and should preclude the site coming forward as an allocation – mitigation in the form of habitat compensation is not an acceptable solution.

In summary, it is inappropriate for any land to be released from the Green Belt to accommodate new development when the impacts, particularly the environmental impacts, are considered to be so significant and much of the land would need to be set aside for green infrastructure, a purpose which it is already satisfactorily performing under the Green Belt designation.

As it stands the aspirational development of the site would appear unviable and this would in turn most likely lead to pressure for development of the 32 ha of the proposed Green Belt release that has been indicated would be set aside for green infrastructure. This would not be acceptable and would further undermine the soundness of the proposals.

Site Assessment Broadbent Moss

Site Plan

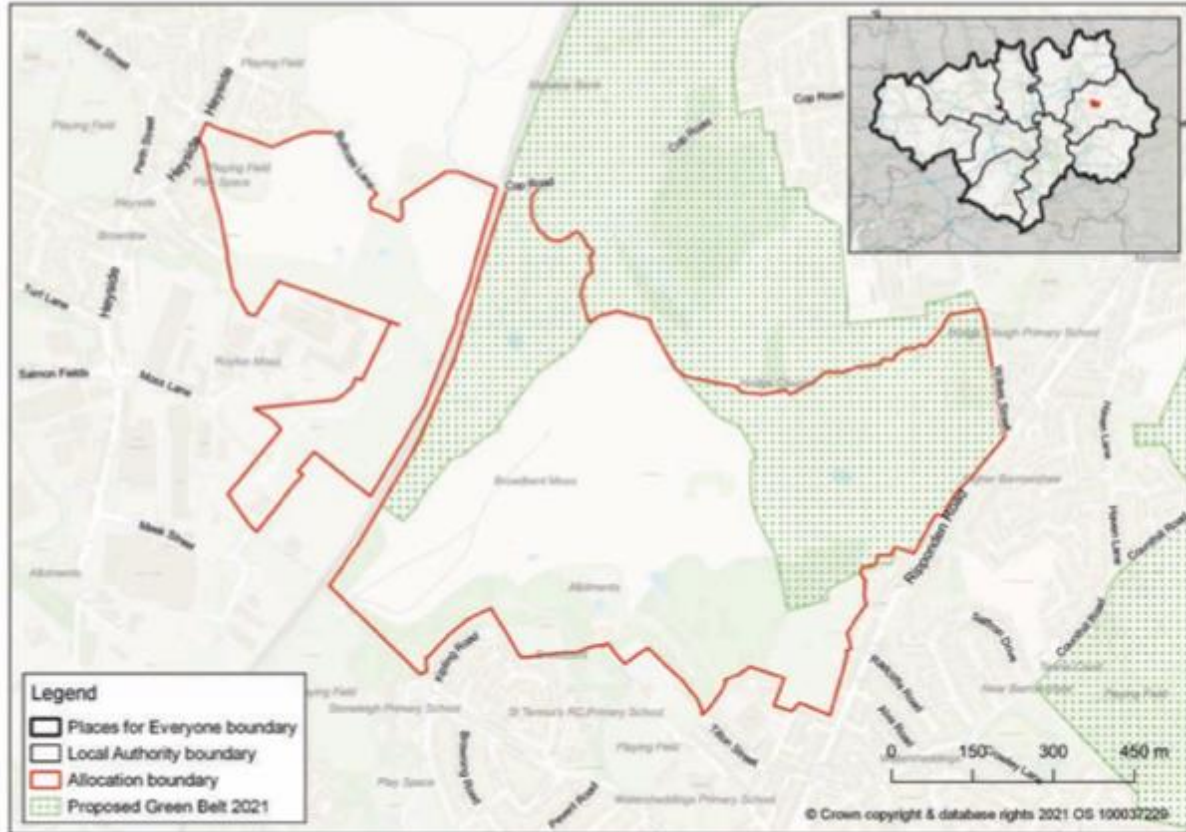
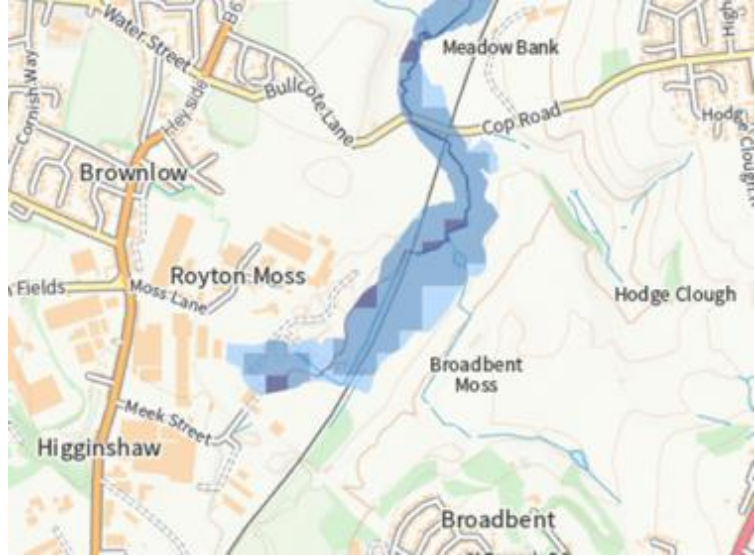
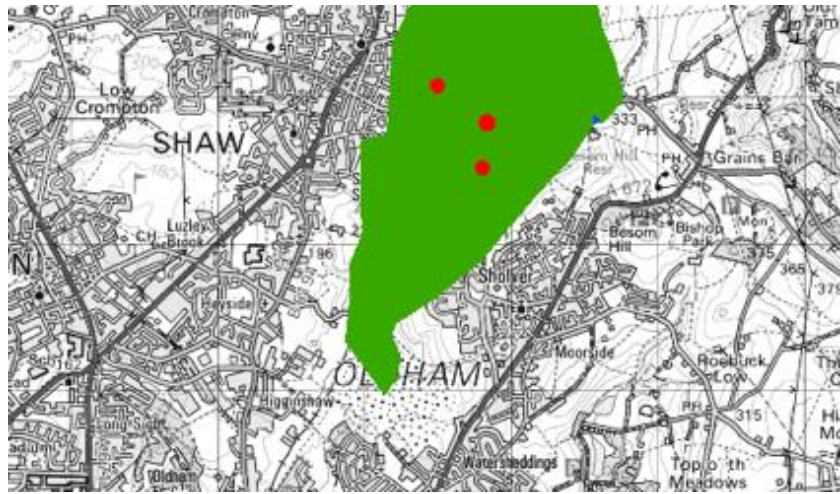


Image Source: PfE – Consultation Report 2021



Site Details	
PfE Reference	JP Allocation 14
Site Address	Three main parcels – land to the east of Hebron Street, south of Bullcote Lane to the boundary with the Metrolink line; land to the east of Mosscote Lane to the boundary with the Metrolink line,

	and; land to the south of Cop Road (east of the Metrolink line to the A672 Ripponden Road).		
Postcode	-	Site Area (HA)	81.63
Description of Site	The eastern portion of the allocation is fairly undulating however the topography has been affected by use of the area for landfill. The western Sites are relatively flat lying at around 180m AOD. The site is dissected by the Metrolink line which presents an existing barrier to the comprehensive development of and infrastructure to facilitate future development.		
Current Land Use	Agricultural to the far east and west, with former landfill/quarry in the central area		
Brownfield/Greenfield	Mixture of both brownfield and greenfield		
Surrounding Details			
Land Uses	Open space to north, residential to east and south and commercial with residential to west. Beal Valley allocation lies to the north (ref JP 12)		
Character of Surrounding Area	Urban to east south and west, open countryside to north		
Constraints			
Policy Constraints	Various designations including partially allocated as Land Reserved for Future Development (LRFD), Other Protected Open Land (OPOL) and Green Belt		
Ground Conditions	Due to the former landfill/quarry use it is anticipated that there is high potential for contamination and in light of the sensitivity of residential use there will be a need for robust testing and potential mitigation works.		
Flood Risk & Drainage	A significant proportion of the central area of the site includes area of Flood Zone 2 and 3. Additional built form in this area would have a potential knock-on effect for the wider site and surrounding area.		

	 <p>There is a groundwater source protection zone and much of the Site is identified as having a peat sub/surface which will have implications for drainage. The Site is in an 'Outer Zone' (Zone II) groundwater source protection zone (see extract from MagicMap below).</p> 
<p>Transport</p>	<p>Enhancements would be required to facilitate access to the Shaw Metrolink stop and an appropriate crossing across the line, along with enhanced links to the west and east, and to the Beal Valley allocation (ref JP 12 – immediately to the north).</p>
<p>Utilities</p>	<p>There is limited infrastructure within the site, with only peripheral water and sewage provision. The dissection of the site with the metrolink means that a comprehensive utilities provision for the whole site would not be practicable.</p>
<p>Environmental</p>	<p>Of the 82ha allocated, it is only anticipated to develop 42ha and the assessment of impact on the Green Belt was approached as three sub-areas to reflect variations in harm to the Green Belt purposes and the distinct land parcels of the allocation. It was concluded that the allocation makes a relatively significant</p>

	<p>contribution to checking the sprawl of Greater Manchester and preventing encroachment on the countryside, and a relatively significant contribution to maintaining separation between Royton and the Sholver / Moorside suburb of Oldham, and the release of the land from the Green Belt was considered to have moderate to high harm on Green Belt purposes and a weakening of the Green Belt boundary.</p> <p>Broadbent Moss falls within the Rochdale and Oldham South Pennines Foothills landscape character area and the Pennine Foothills South/ West Pennine landscape character type as identified within the Landscape Character Assessment, with any development likely to have a medium to high impact on this character and substantial mitigation required.</p> <p>The Site includes priority habitats and potential for protected species which would need to be assessed further prior to development being undertaken and appropriate mitigation implemented.</p>
<p>Historic Environment</p>	<p>No LB's, SAMs or CAs on the site although there are a number in close proximity that may be impacted by development within their setting.</p> <p>There is potential for archaeological remains within the moss areas but not the larger former landfill site, particularly from the Prehistoric, Post-Medieval and Industrial periods, therefore further archaeological work is recommended (source: Oldham Historic Environment Assessment 2019)</p>
<p>Social</p>	<p>Any development within the proposed allocation site would need to assess the requirement for additional social infrastructure (education, healthcare etc).</p>
<p>Requirements to overcome constraints</p>	<p>Mitigation for contamination due to former use.</p> <p>Mitigation for impacts on Green Belt purposes, landscape character, ecological designations and potential protected species habitats.</p> <p>Access provision to and across the Metrolink</p>
<p>Planning History</p>	<p>PA/339409/16 - Land at Mosstown Road, Royton, OL2 6HP: Outline application for use of site for industry, offices, warehousing (Use Classes B1, B2 and B8) and a waste to energy plant, access to be considered, all other matters reserved. This application was refused in March 2018 on OPOL, flood risk, highways and local amenity grounds.</p> <p>PA/343341/19 - Land to the east of Hebron Street and Brownlow Avenue, Royton, Oldham: Erection of 77 no. dwellings, open space and associated works. Amended application relating to PA/341416/18. Planning permission was granted subject to a legal agreement in May 2020. The application site is located to</p>

	<p>the north-east corner of the Broadbent Moss allocation, between Hebron Street and Brownlow Avenue to the west, and Heyside Park (and Bullcote Lane) to the north. The Higginshaw BEA is located to the south.</p>
<p>Deliverability</p>	<p>Not known although the initial viability assessment indicated that development would be marginally viable albeit the employment element would not include a sufficient margin to be able to contribute to infrastructure costs for the wider site.</p> <p>Blanket values of £250,000 per ha were applied across the whole of Greater Manchester.</p> <p>The viability assessment considered the anticipated scale of development could provide only 15% affordable housing and that strategic transport and infrastructure costs would be high. Factors including the overall net developable area and the likely high abnormalities that would be associated with mitigating constraints such as contamination, ecology, topography and drainage would significantly influence the deliverability of any development.</p> <p>The plots which comprise the Site are in 13 ownerships – this may have implications for deliverability.</p>
<p>Anticipated timeframe for availability</p>	<p>874 homes identified for delivery during the current plan period</p>
<p>Other relevant information</p>	
<p>Expected to deliver around 1,450 homes excluding the 77 referred to above (500 of which post 2037) & 21,720 sq m of employment floorspace by extending neighbouring commercial areas (Higginshaw Business Employment Area).</p> <p>There is a high potential for contamination due to the former landfill/quarry use and as such it is questionable as to whether the Site should be released from the Green Belt in advance of any further investigative work being undertaken – residential use is highly sensitive and in addition, many former quarry/landfill locations are key habitat for protected ecological species and this also therefore needs further investigation in advance of any site release.</p> <p>The net developable area will be impacted on by need for ecological and flood risk mitigation – this should have been considered in advance of setting an indication of predicted residential unit yield. The site is in a groundwater source protection zone and the extent of any development needs to account for this.</p> <p>With approximately half of the site needing to be set aside for green infrastructure and mitigation to offset the significant impacts of removing the land from the Green Belt in the first place, alongside facilitating future development with currently unknown mitigation requirements to address aspects such as flood risk/drainage and ecological mitigation, the proposed Green Belt release is not justified or robust. In addition to mitigation for impact on Green Belt purposes, development proposals would also need to mitigate the medium to high impact on designated landscape character.</p>	

The Site has already been identified as containing priority habitats and has potential for protected species but to date insufficient surveys have been undertaken to ascertain the precise level of impact any development would have. These assessments should be a prerequisite for any release of land from the Green Belt if the purpose of such release is to facilitate development.

Site Assessment Cowlishaw

Site Plan

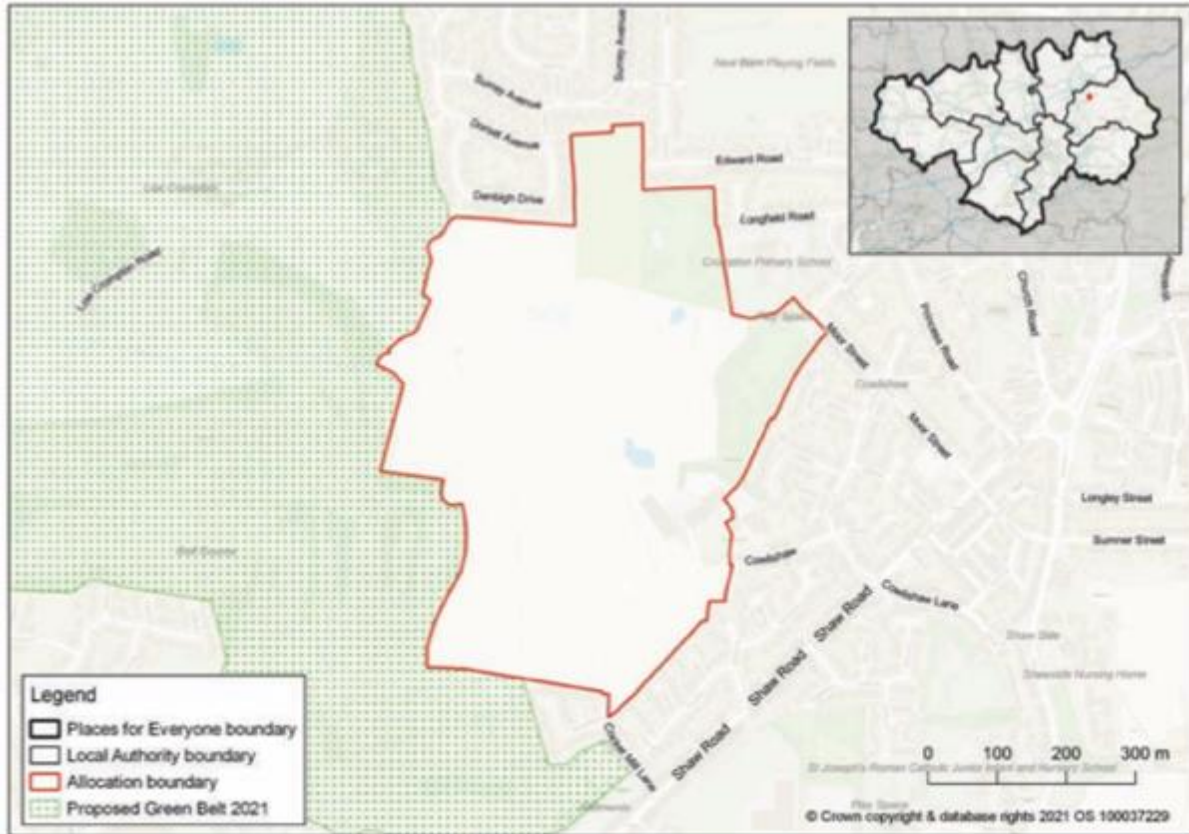



Image Source: PFE – Consultation Report 2021



Site Details			
PfE Reference	JP Allocation 16		
Site Address	Cowlishaw Farm		
Postcode	-	Site Area (HA)	32.2

Description of Site	The topography consists of gently sloping land, which slopes north-east to south-west. The land is predominantly rural in nature and appears to be mostly used for pasture. The area also contains the source for the river Irk.
Current Land Use	Abattoir, school playing fields and agricultural land.
Brownfield/Greenfield	Predominantly greenfield other than for the abattoir complex
Surrounding Details	
Land Uses	The site is bounded by Shaw to the east, Luzley Brook to the south, Crompton and Royton Golf Club to the west and Higher Crompton to the north
Character of Surrounding Area	Open countryside separating the towns of Shaw and Royton
Constraints	
Policy Constraints	Allocated as Green Belt and Other Protected Open Land
Known Contamination	None known but a Phase 1 & 2 contamination report would be required with any future development proposals.
Flood Risk & Drainage	Flood Zone 1 (See EA map extract below) therefore it would be an acceptable housing site in principle but any development proposals would require an FRA (Subject to site area and use). 
Transport	The Site is not considered to be highly accessible and the cumulative impact with other proposed Green Belt release sites is anticipated to have a material impact on the highway network,

	<p>with most mitigation measures required in the short term (0-5 yrs) and the remainder in the medium (5-10 yrs).</p> <p>There is no existing access to the Site other than from Cocker Mill Lane which is the primary access for the existing industrial units in the southern parcel of the allocation but this route does not include pedestrian footpaths. Future access is anticipated to include Cocker Mill Lane to the south, Kings Road/Moor Street to the east, and Denbigh Drive to the north but more work is required to ascertain whether the potential access points are functionally capable of facilitating the quantum of anticipated development.</p>
Utilities	The Site is traversed by electricity cables north to south and these would impact on net developable area (or need to be rerouted).
Environment	<p>Cowlshaw falls within the Rochdale and Oldham South Pennines Foothills landscape character area and the Pennine Foothills South / West Pennine landscape character type as identified within the Landscape Character Assessment and the anticipated nature of residential development is considered to have a medium sensitivity of impact on this character.</p> <p>There are also areas of biodiversity within the site, including the existing Site of Biological Importance (SBI) 'Ponds at Cowlshaw Farm' and the priority deciduous woodland habitat located to the rear of Worsley Drive which are identified as potentially significant constraints to development. No detailed assessment of protected species habitats has been undertaken and this is recommended as part of any future development proposal.</p>
Historic Environment	No heritage assets on the Site but there is potential for preservation of palaeo-environmental evidence and the impact of any development on the setting of nearby heritage assets will need to be taken into account.
Requirements to overcome constraints	<p>Suitable access would need to be provided to all areas of the allocation with further assessment required to ascertain if this is possible.</p> <p>Rerouting of electricity cables or reduction in net developable area to compensate.</p> <p>Ecological sensitivity and impacts on protected species and habitats.</p> <p>Land ownership and therefore availability may be a constraint</p>
Planning History	PA/344179/19 – an outline planning permission was granted in September 2020 for the demolition of existing buildings and for residential development with all matters reserved except for the principal means of access from Cocker Mill Lane for a

	<p>residential development. The proposal is for up to 250 new homes and relates approximately to the mid-south eastern portion of the proposed allocation, including the abattoir, within a single ownership.</p> <p>In 2015 an outline planning application had been submitted for Cowlshaw Abattoir for 125 dwellings and associated works (PA/337616/15). The application site measured 6.33ha, covering the abattoir land parcel but was withdrawn in September 2016.</p>
<p>Deliverability</p>	<p>Not known although the initial viability assessment indicated that development would not be viable and would only become viable with an uplift in anticipated unit values.</p> <p>Blanket values of £250,000 per ha were applied across the whole of Greater Manchester</p> <p>The viability assessment considered the anticipated scale of development could provide only 15% affordable housing and that strategic transport and infrastructure costs would be high. Factors including the overall net developable area (13.5ha of the overall 32.2ha site) and the likely high abnormalities that would be associated with mitigating constraints would significantly influence the deliverability of any development.</p>
<p>Anticipated timeframe for availability</p>	<p>Not known</p>
<p>Other relevant information</p>	
<p>Objective to deliver 465 dwellings excluding the extant permission.</p> <p>More work needs to be done to ascertain whether there is a realistic opportunity to provide access to all of the Site due to constraints in ownership (having implications for the routing of vehicle movements) and existing road widths, as well as mitigating the cumulative impacts of any development on the wider highway network (when considered alongside other proposed green belt release allocations).</p> <p>Presence of electricity overhead cables is a constraint that will need to be addressed – proximity to such infrastructure close to residential development is questionable.</p> <p>Development of the Site would have a medium sensitivity of impact on the protected character area which would require mitigation. The Site is also home to designated sites of biological importance, with the presence of protected species not having yet been assessed in sufficient detail to justify releasing the land for development.</p> <p>There is a substantial portion of the proposed allocation that would be set aside for green infrastructure/mitigation (approximately 19ha of the 32ha site). It is questionable why any development would require such a significant amount of mitigation and, if removed from the Green Belt, what measures would be in place to protect this land from future development.</p>	

Appendix 7 Site Assessments of Proposed Allocations within Rochdale

Site Assessment Bamford/Norden

Site Plan

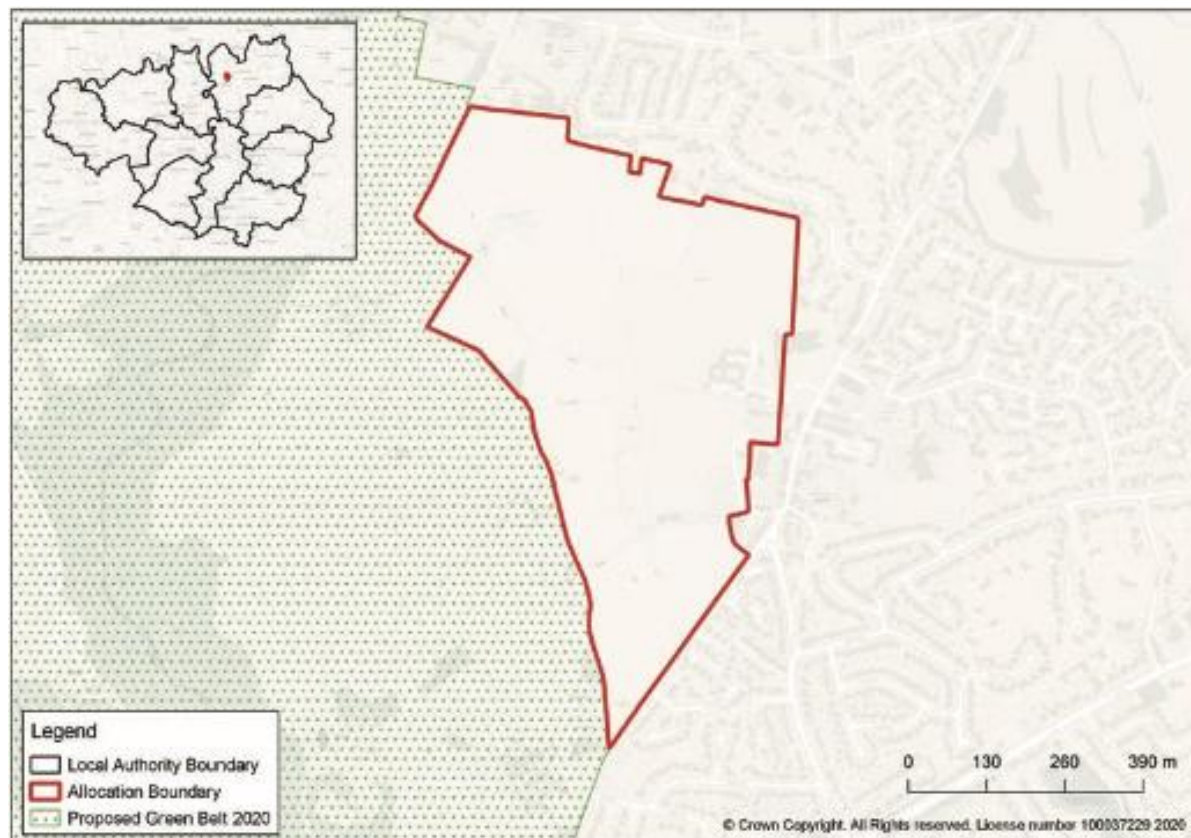
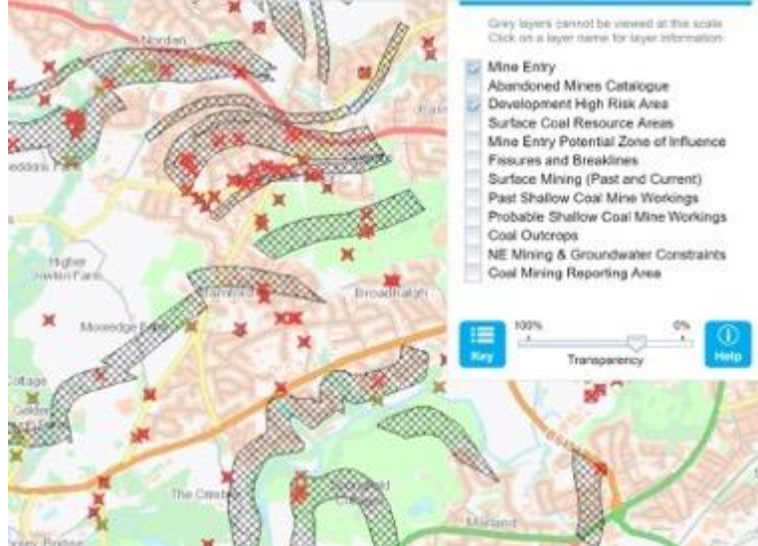



Image Source: Places for Everyone – Publication Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 19		
Landowner	<p>The Topic Paper states at paragraph 7.2 that over 2/3 of the site is in private ownership and that these owners have publicly stated that they are not willing to sell the land for development.</p> <p>The developer owns 24% (8ha) of the site. The sports facilities occupy 30%, the main landowner has 34% (>11ha) and is on public record stating he does not want to sell the land. It is his family business and he is the third generation to farm this land.</p>		
Site Address	Land off Norden Road, Bamford, Rochdale		
Postcode	OL11 5UU	Site Area (HA)	35.6 ha
Description of Site	The site is understood be currently designated as Green Belt within the adopted Development Plan. The site is noted to be vacant greenfield other than existing farmsteads and structures associated with the sport and recreation facilities including		

	Bamford Fieldhouse cricket club, Rochdale Racquets and Bridge Football Club.
Current Land Use	Predominantly vacant greenfield but with some scattered development as detailed above albeit limited to appropriate developments within the Green Belt and within a mineral safeguarding area. The land is Grade 3 agricultural land which is used for grazing and grass crops.
Brownfield/Greenfield?	Greenfield, other than the structures and uses referred to above.
Surrounding Details	
Land Uses	The allocation is bounded by the urban area of Norden to the east, Norden Road and the settlement of Bamford to the south and open countryside to the north and west. The land is the last remaining publicly accessible green space in the community. Other greenfield sites have no public access. It has numerous public footpaths and is in constant use by members of the public. In 2020 over 500 people per week were using the land, during lockdowns in 2021 this had risen to 2,000 per week (surveys undertaken by local residents in response to the proposed allocation).
Character of Surrounding Area	The allocation whilst on the edge of the settlements of Norden and Bamford is rural in character.
Constraints	
Policy Constraints	The site is within the Green Belt and contains a number of sport and recreation facilities which will be protected and need to be retained, particularly as they have been identified within the playing pitch strategy as being as key club site.
Ground Conditions	<p>The site is understood to slope upwards to the north with several undulations and gullies and currently comprises open fields with some limited buildings.</p> <p>It is understood that there is a landfill site to the north of the allocation and is within a Class 1 Radon area. The site was used for coal mining in the 19th century and is marked on Coal Authority maps as having 2 disused mine entrances on the boundaries and a large area is classed as a High Risk Development Area (see extract map below).</p>

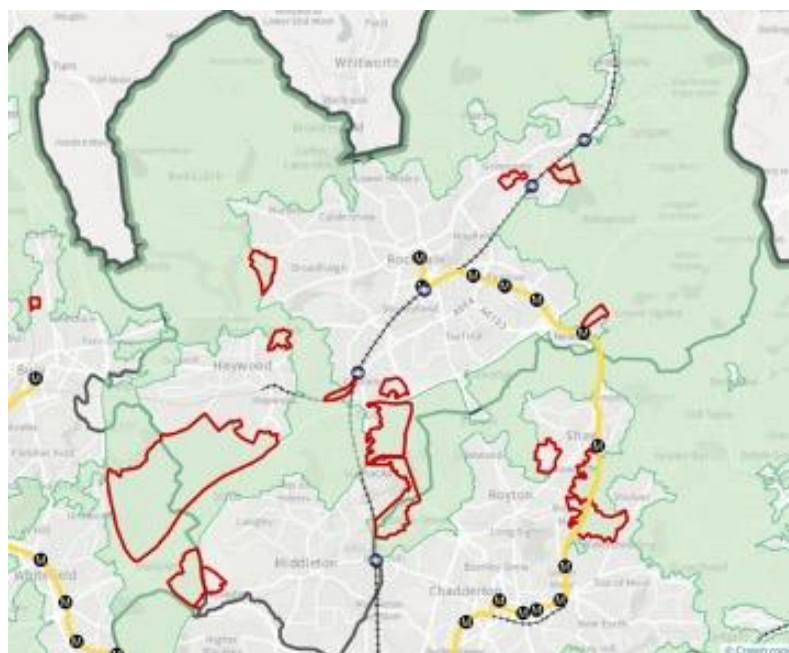
	 <p>The allocation is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed.</p> <p>The potential for ground contamination particularly from adjacent uses, and impacts on ground water and safety of the development on site need to be more carefully considered prior to the allocation of the site.</p>
<p>Flood Risk and Drainage</p>	<p>Large areas of the site are flooded on an annual basis from both surface water run-off and standing levels from the water table rising. The flood risk assessment significantly underestimates reality. The southern corner of the site floods most years and this regularly spills over onto Norden Road. The drains are unable to cope with current levels of surface run off during heavy rainfall and developing the site would reduce the area of land available to act as a natural soak away, and at the same time would increase impermeable surfaces and increase the propensity for localised flooding.</p> <p>The L1 Strategic Flood Risk Assessment for Greater Manchester states that Rochdale is amongst the worst areas for high flood risk and therefore the reference within the Topic Paper to suggest that the issue of flood risk can be addressed at application stage is inappropriate and irresponsible.</p> <p>Below is a photograph taken in February 2020 of surface water flooding into adjacent fields from Jowkin Lane following heavy rainfall.</p>

	 <p>Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed, and the concerns on surface water flooding given the significant increase in hard standing on site.</p>
<p>Transport</p>	<p>The allocation is not in a sustainable location and has poor accessibility by public transport.</p> <p>The site is not “internationally” accessible and not considered nationally accessible.</p> <p>The location of the site does not encourage journeys by walking, cycling and public transport. There is no rail or Metrolink to the area, limited bus services and the local highway network is already severely congested at peak times with an acknowledgement within the Topic Paper at paragraph 10.6 that existing traffic levels on Norden Road already make it difficult to cross. A local traffic survey found that 900 cars use the junction at peak periods, twice a day. If this were to be increased by say another 7-800 cars the queues could be up to 4km long.</p> <p>The proposal to make Norden Road one-way does little to reduce the traffic problem, it merely moves the problem to War Office Road. The nearest Met stop / train station is 6km away. The nearest secondary school is 2.25km away which is a 40 minute walk. Most parents will drive their children to school. The rapid transit bus service to Manchester is merely an aspiration of the Council’s, there is no evidence this will definitely happen.</p>

According to the Transport Locality Assessment Addendum – Rochdale Table 4, Traffic will be dispersed over several roads, however this is disingenuous as to reach 4 of those roads all traffic has to pass along War Office Road first, therefore 69% of AM peak hour traffic will be funnelled along one road using the proposed one way system.

The same document (para 4.3.1) appears to significantly underestimate the number of departures. 450 3-4 bed houses will lead to 155 additional departures AM and 166 arrivals PM seems highly unlikely. 450 houses with potentially have 8-900 cars and the assessment undertaken considers that only 17-18% of morning journeys would be by car at peak times. Finally in para 3.2.1 Table 1 admits that there will be more journeys in 2040 compared to the original estimates but goes on to state there will be no impact from these journeys. Given the poor access to public transport this is highly unlikely and should be addressed as a priority in advance of any site allocation of Green Belt release.

The development is not located to reduce the need to travel by car due to the limited public transport services as can be seen from the map extract below.



There is a disconnect between the type of residential dwellings planned (i.e. executive homes) and the lack of high-paid employment opportunities in the locality. This will lead to a reliance on private car journeys to the development. The site does not appear capable of development on highway capacity grounds and significant alterations are required to facilitate the development in direct conflict with NPPF which advises that transport issues should be considered at the earliest stages of plan making.

Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p> <p>The site contains 7 electricity pylons carrying 2 separate lines. One is 135ghz, the other 270ghz. International studies have shown that children living within 50metres of the power lines (not just the pylons) are at an increased risk of leukaemia, and whilst easement can be provided for thee this could well impact on the developable area of the site and its associated viability. Impacts on health and safety from power lines and the impact on build heights etc will also need to be addressed.</p> <p>Finally, the site is riddled with water mains some redundant others still in use. These include the redundant main watermain to Heywood, the main line to Buersil Trunk Main and various 19th century drains.</p>
Environmental	<p>The site will result in the loss of 35.6ha of Green Belt. The site is noted to perform strongly in relation to a number of purposes for allocating land as Green Belt and the Green Belt harm assessment is noted to conclude that the allocation site plays a moderate to relatively significant role in respect of checking the unrestricted sprawl of the large built-up area and preventing encroachment on the countryside.</p> <p>The Topic Paper confirms at paragraph 14.6 that the release of the allocation would constitute moderate harm to Green Belt purposes, would not increase containment of any retained Green belt ad would have negligible impact on adjacent Green Belt.</p> <p>It is our view that the resultant harm from the release of this Green Belt is significant and that insufficient special circumstances have been put forward to justify the allocation of this site. The site only fulfils one of the 7 Site Selection criteria (Norden & Bamford Allocation Topic Paper para 5.2): Criterion 7 – Land that would deliver significant local benefits by addressing a major local problem/issue.</p> <p>Firstly, there is no “major local problem/issue” that would be addressed by building 450 executive homes in Bamford. There are many houses for sale and Rochdale is an area of very low housing demand. In the Call for Sites Submission, Peel have been selective with the truth, and it appears the inclusion of this site in the PfE is developer led. Using Green Belt land to build executive homes in an area with an extensive number of executive homes, does not in any way satisfy the “exceptional circumstances” required to justify the release of this land.</p> <p>Secondly, there are no local benefits to building 450 homes on this site. Conversely, there will be significant harm caused by:</p>

	<ul style="list-style-type: none"> o Loss of protected Green Belt o Loss of Public access to green space o Possible loss of playing fields and sports facilities o Increased congestion on roads. Peak period traffic is currently 900 cars/ hour. o Inadequate main drainage o Over-crowded schools o Increased urban sprawl as an additional 450 houses will be built in an area which has seen over 2,000 houses built in 60 years. o Significant deterioration in air quality near an AQMA and a primary school o Increased pollution and CO2 from additional buildings and traffic o Increased flooding risk o Loss of a carbon sink o Danger to health through building near power lines o No access to doctors' surgeries o Risk of unsafe building on old mine workings o Loss of ancient hedgerows and mature trees o Loss of habitats for wildlife <p>The allocation is noted to be close to Ashworth Valley which provides a highly attractive natural landscape and whose visual amenity is likely to be detrimentally affected by the development of this site.</p> <p>In relation to ecology it is noted that the GMCA's appraisal indicates that any ecological constraints on the site are unlikely to be significant but further surveys are required. It is our view that the evidence base on this important issue is somewhat lacking and is not robust enough to currently warrant allocation of the site.</p> <p>The impact on air pollution and noise pollution from the extensive additional traffic resultant from this development is also of concern to local residents both in its impacts on future residents and on those in the local area. Coupled with this is the fact that there is an AQMA outside a primary school within 150m of the Southern end of the site. This will be exacerbated by the fact that proposed residents are likely to need to travel by private car to access key services and facilities etc</p>
<p>Historic Environment</p>	<p>The Topic Paper draws attention to a Historic Environment Assessment created to support the Plan. This sets out a number of recommendations for this allocation including on archaeology and the need to protect existing sites and assets. The need to protect the historic environment from inappropriate development simply needs to be clearly addressed prior to allocation of the site.</p>

	<p>The Norden and Bamford Historic Environment Assessment Summary states “there are large areas of the.....site where there is potential for buried archaeological remains to survive in situ.....likely to be of local or regional significance” Para 3.2 states there is high potential for archaeological remains due to lack of disturbance.....(which) have the potential to be regionally important. Para 6.1 “potential for hitherto unknown pre-historic remains which have the potential to be of high local / regional importance”</p>
Social	<p>The loss of fields, hedges and trees in close proximity to Ashworth Valley will have a negative impact on Green infrastructure. Most of this land has been undisturbed for centuries and fields, paths and hedgerows are unchanged from maps as early as 1848 and no doubt 100’s of years earlier.</p> <p>The development of houses on the only current green link between Bamford and Ashworth Valley will adversely affect biodiversity and severely reduce the ability of wildlife to cope with climate change. The remaining Green Belt land in Bamford has no public access unlike this allocation which contains over 2 miles of heavily used footpaths to allow recreation and aid mental health. If this land is developed the nearest public green space is a 20 minute walk away through an AQMA zone. During the recent lockdown, for the week ended 6.3.2021 2,005 people, 49 hose riders and 179 cyclists used just one entrance to this Green Belt land. It is highly valued by locals for fresh air, exercise, leisure and to improve mental health. The public footpaths on this site are all easily accessible without going near heavy traffic or using a car. All of these paths are on the East side of Jowkin Lane. There is NO public access to ANY land on the West side of Jowkin Lane, despite maps on p40 of the Development Framework by Peel implying there is and showing green arrows implying access points.</p> <p>The impact of the development on local service and facilities and the need to protect the existing sport and recreation facilities on site are also of importance.</p>
Requirements to overcome constraints	<p>Primary schools in the local area and understood to be oversubscribed and this development will only worsen existing pressures. This applies in equal weight to existing health care services, the nearest GP Surgery is working at a doctor patient ratio of 1:2000, 2.5 times the national average of 1:800, which will be placed under greater strain by the significant increase in population being proposed.</p>
Planning History	<p>None relevant – the site is undeveloped Grade 3 agricultural land.</p>
Deliverability	<p>Given that the Council determine that the local area is understood to be one of the most significant areas of larger, higher value housing and considered to be desirable and aspirational it is understandable to conclude that the site is</p>

	<p>viable. However, there are many obstacles to the deliverability of this site, including:</p> <ol style="list-style-type: none"> 1. The developer only owns 8 ha. The main landowner owns 11.5ha and is on public record as saying they do not want to sell as they are the third generation of their family to farm this land. 2. There has only been a desktop flood risk assessment. 3. A section across the middle of the site is classified as High Risk Development land due to past mining activities. 4. Traffic issues have not been addressed in any meaningful manner 5. There is potential for regionally significant archaeological remains to be lying buried in the site, especially in the Southern half. 6. A full report on the ecology has been deferred. <p>In relation to the landowners the GMCA have not addressed concerns on the land being available for development and therefore cannot meet the tests of soundness. Furthermore, given the location and the fact that the site is a greenfield only heightens the ease with which the issue of viability can be addressed. However, it is not noted to pay significant regard to the extensive transport improvement required, or the potential impact of flooding or ecological matters, all of which can undermine viability and further questions the deliverability of this allocation.</p> <p>Questions still need to be addressed as to whether the housing being proposed in this location is suitable and can be seen to be meeting identified local housing sites including supporting first time buyers and young families to remain within the area.</p> <p>Despite the developers brochure mentioning affordable homes in several places, the site Viability Assessment shows zero affordable homes.</p>
<p>Anticipated timeframe for availability</p>	<p>Unspecified although the transport modelling is note to relate to the period 2025-2040. The 2019 GMSF stated that an immediate start was planned.</p>
<p>Commentary</p>	
<p>This allocation will result in the loss of a large area of Green Belt and the resultant harm is deemed to be significant., The GMCA have not presented a sufficiently robust argument to make the case for special circumstances and as such it is our view that the site should not be being released for development.</p> <p>There are significant concerns in relation to traffic levels and impact on the safety of the highway, as well as concerns on congestion, air pollution and general noise and disruption.</p>	

The site clearly has archaeological and ecological value, neither of which have been robustly addressed within the supporting documentation.

The potential impact on the existing spiriting facilities within the allocation boundary remain of concern to the community.

In short, the proposed allocation of this site has not been robustly supported with a suitable evidence base or sufficient justification provided in relation to special circumstances for release. The allocation is therefore likely to be found to be unsound and should be removed from the PFE policies.

Site Assessment – Castleton Sidings

Site Plan

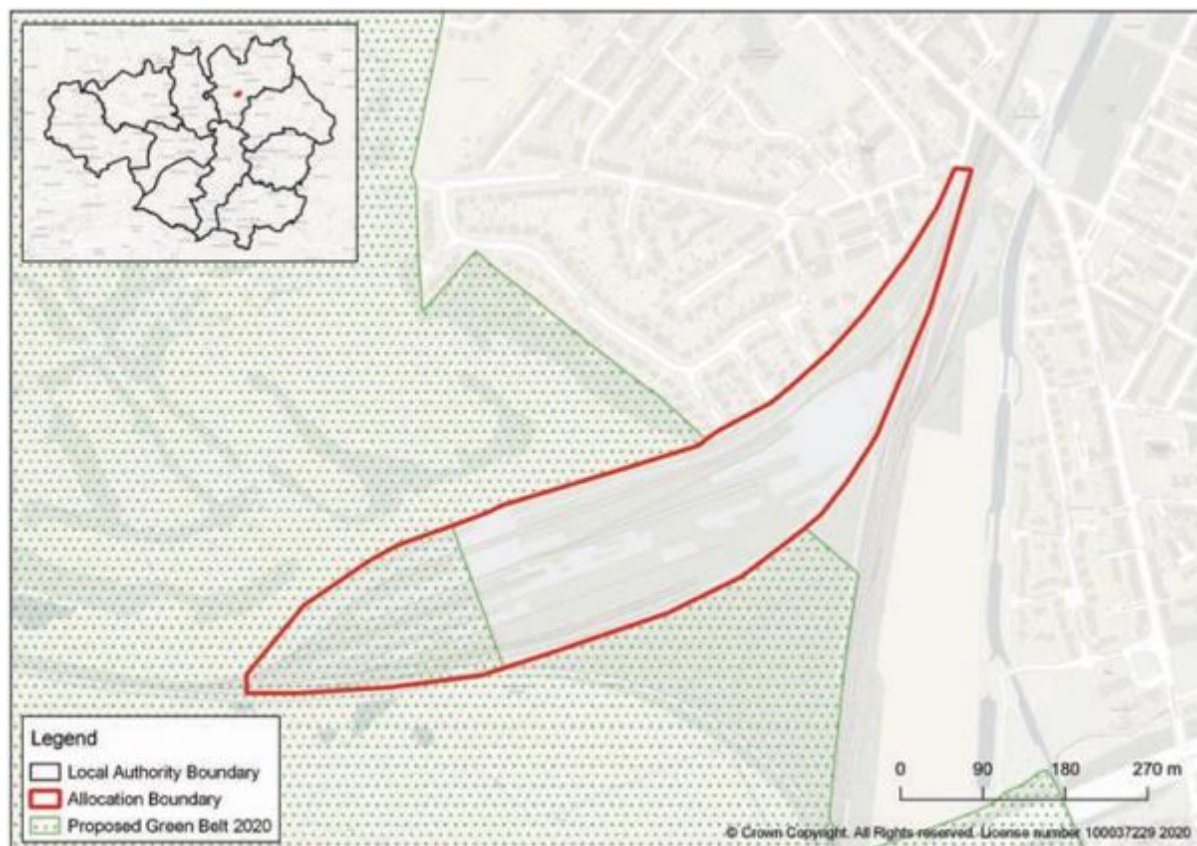


Image Source: Places for Everyone – Publication Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 20		
Landowner	Unknown but has been put forward by site promoters		
Site Address	Castleton Sidings, Fairway, Rochdale		
Postcode		Site Area (HA)	11.5 ha
Description of Site	The site is partly located within the Green Belt but is also in part a previously developed site		
Current Land Use	The western portion of the site is in the Green Belt and is a currently vacant former railway siding.		
Brownfield/Greenfield?	Previously developed site in the Green Belt		
Surrounding Details			

Land Uses	The site is bounded to the south by the railway line, to the east by the urban area of Castleton Moor. Castle Hawk Golf club is located to the north, with open countryside to the west.
Character of Surrounding Area	Whilst there are urban areas in close proximity to the allocation, the site and immediate environs is in fact rural in character.
Constraints	
Policy Constraints	The western portion of the proposed allocation is located within the Green Belt.
Ground Conditions	Given the history of the site it is clear that there will be a need to remediate in order to ensure that the site is safe for the proposed end users. Whilst some initial assessment has been undertaken on this it is noted that more intrusive investigations are still required. In reality without a complete understanding of the scale of contamination and the scale and costs of any remediation it is not feasible to allocate the site for development, as it may well be found to be unviable in due course and undeliverable. This does not address the tests of soundness.
Flood Risk and Drainage	The Topic Paper indicates that the issue of flood risk can be addressed at application stage. Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding, this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed along with the concerns on surface water flooding given the significant increase in hard standing on site.
Transport	<p>The allocation is proposed to be accessed from two new accesses on Fairway. Whilst this will create one-way circulation it does not address the significant concern in relation to likely increase in traffic and traffic movements resultant from the development and the associated impacts on the wider network in terms of congestion and highway safety etc. This would be exacerbated by the scale of growth proposed within the wider area and the issues on the network with current levels of movement.</p> <p>Whilst within walking distance of Castleton Railway Station the site is not sustainably located in relation to access to wider public transport links and local services and facilities to a degree that we do not agree with the conclusion in the Topic Paper at paragraph 10.7 that the ease of access means the potential traffic impacts on the existing network will be moderate. The reality is that people will continue to make short trips via private vehicle and this has not been addressed within this proposed allocation.</p>

Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p>
Environmental	<p>The allocation incorporates an area of Green Belt and will result in the loss of 5.3ha of Green Belt land. Whilst it is noted that the site is not deemed to result in strong impacts on the purposes of the Green Belt, the local community do still consider the site to have value and to be assisting in creating a visual gap and preventing coalescence between Castleton and Hopwood. In that regard residents feel that this proposed allocation will result in harm to a degree which has not been robustly justified, particularly when assessed cumulatively with other Green Belt releases proposed in the local area.</p> <p>Whilst section 17 of the Topic Paper indicates that the site has limited landscape value, it certainly offers greater landscape potential if brought to life for a public park, as opposed to a large area of built development.</p> <p>The fact that the draft policy makes reference to the need for high quality landscaping and boundary treatment only raises concern in relation to visual amenity and the impact of the scale and form of development being proposed in the wider area.</p> <p>The site is noted to be in close proximity to a number of ecological networks including the Rochdale Canal which is a Special Area for Conservation and a local wildlife site. It is noted that the site has potential to be used by bats, common lizards and badgers and has the potential (if not already doing) to support priority habitat types or priority species including broadleaved woodland and species-rich grassland. However, clarification on these important issues and the impact from the development on the environment remain outstanding with the need for surveys pushed back to application stage. Given the need to ensure allocations are supporting development in the right place and the value placed on ecology and the wider environment it is our view that the evidence base on these important issues is severely lacking and mean that the site will not meet with the tests of soundness.</p> <p>Residents are also concerns about the impact on light, noise and air pollution from the proposed scale of development, and this concern is heightened by the fact that the site is within 150m of an Air Quality Management Area. The effects of increased traffic on local health outcomes should also be factored into the decision on allocation. The impact of noise from the railway line on the amenity of the proposed occupiers of the new dwellings also needs more careful consideration.</p>
Historic Environment	<p>There are no known heritage assets on site, however there are a number in the wider local area including views to and from St</p>

	<p>Martins Church, Castleton Conservation Area and the setting of lock 53, the towpath bridge and the United Reform Church.</p> <p>In reality the scale and nature of development being proposed will result in harm to these designated heritage assets for which the wider public benefit to support the development and release of land from the Green Belt has not been provided.</p>
Social	<p>There is understood to be issues in relation to school place provision at primary school level, with secondary provision currently under served, but potentially improved in the coming years with funding for two new secondary schools to be delivered within the next three years.</p> <p>However, it is clear that, due to the scale of development within this allocation, and cumulatively within the area, there will be additional pressures placed on local school provision. The same issues will be felt across the care and health sectors and insufficient assurances have been provided to the local community to address their concerns in relation to accessing these services in the future.</p>
Requirements to overcome constraints	Investment in school and health provision, transport infrastructure etc are all required to support the delivery of this allocation.
Planning History	None relevant
Deliverability	Section 25 of the Topic Paper raises serious questions in relation to the viability of this allocation with a negative residual value of -£5m. This does not even appear to factor in costs associated with site remediation (as this is still somewhat of an unknown) or addressing other technical or environmental considerations on site including flooding and ecology. There are therefore genuine concerns that this allocation is simply not deliverable and does not therefore pass the tests of soundness. Relying simply on increasing land values does not appear robust or reasonable.
Anticipated timeframe for availability	The Topic Paper does not clarify the anticipated date for delivery, however it is noted that the transport modelling has been based on the period 2025-2040.
Commentary	
<p>This allocation is accepted to only result in the release of a small area of Green Belt, however the resultant harm from this loss is deemed to be significant and has not been outweighed by wider public gain.</p> <p>The site is likely to result in increased traffic and congestion within the local area, as well as raising issues on noise, light and air pollution.</p> <p>The site is likely to have significant environmental issues including flooding, ecology and contamination, none of which have been robustly addressed within the evidence to support the allocation.</p>	

There are legitimate concerns that the allocation is in fact unviable and therefore undeliverable and therefore whether this allocation meets the tests of soundness.

Site Assessment Crimble Mill

Site Plan

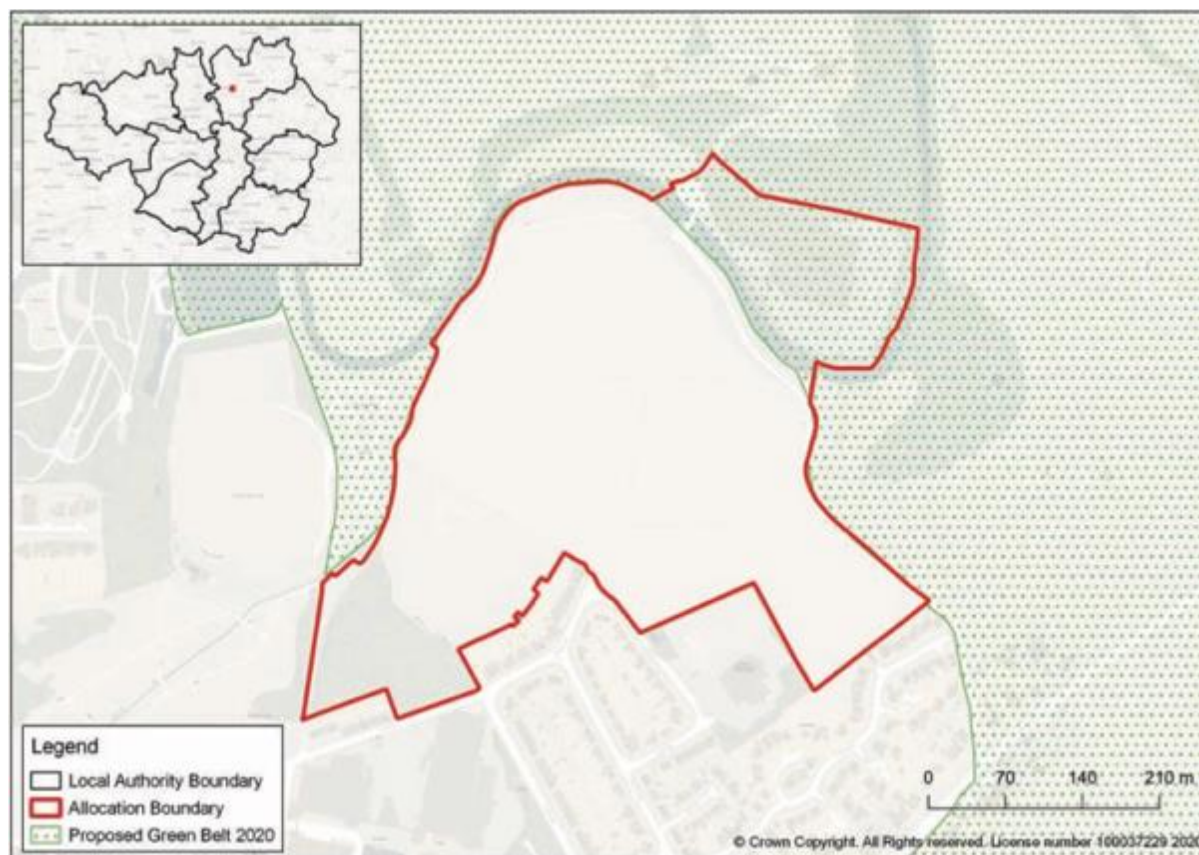



Image Source: Places for Everyone – Publication Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 21		
Landowner	Unknown but the site is being put forward by a site promoter		
Site Address	Crimble Mill, Crimble Lane, Crimble, Rochdale		
Postcode		Site Area (HA)	16.8ha
Description of Site	The site is located within the designated Green Belt and includes a Grade II* listed building.		
Current Land Use	Vacant greenfield site with a vacant and poorly maintained, semi-derelict Grade II* listed former mill building.		
Brownfield/Greenfield?	Greenfield site within the Green Belt which also houses a former mill building		
Surrounding Details			

Land Uses	The allocation is located along the River Roch and is bounded to the west by the settlement of Heywood, to the east by Heywood Cemetery, to the north by the settlement of Bamford and by open countryside to the south beyond Rochdale Road East
Character of Surrounding Area	The area is semi-rural in character.
Constraints	
Policy Constraints	The site is within the Green Belt as designated within the Development Plan and also houses a designated heritage asset. The site may also be within a mineral safeguarding area for sand and gravel with sand with clay and gravel.
Ground Conditions	<p>Potential issues with the structural integrity of the site in relation to the double fault on which the area is built and the impact of construction traffic and the potential for tremors.</p> <p>The historic use of the site may also give rise to concern on potential site contamination and the need for significant remediation. These issues are noted to remain outstanding with further surveys required. In reality, until these issues are addressed, the impact on viability and deliverability cannot be confirmed.</p>
Flood Risk and Drainage	<p>As shown on the Environment Agency Flood Map extract included below, the site is in an area at risk from flooding (part of which is within flood zone 3 and has recently been the subject of major flooding).</p>  <p>The Topic Paper to support this allocation acknowledges this issue and simply states that it will need to be addressed. Given that sites should only be brought forward for development in appropriate locations, and areas at risk from flooding should be avoided, it is clear that as drafted there is no justification in this instance to be proposing to allocate a site for development where flood risk is likely to be a serious concern, especially when viable alternatives have still not been adequately addressed in relation to development in the main urban area.</p>

	<p>It is noted that the site will need to pass both the sequential and exception test and, in reality, across Greater Manchester there must be more suitable land at lower risk from flooding that could accommodate the needs of this development. The justification put forward for land release etc is not deemed sufficiently robust to justify allocations such as this. The safety of proposed residents and neighbouring properties simply cannot be ignored.</p>
Transport	<p>The access to the allocation off Crimble Lane and the junction with Rochdale Road East Lane is simply not suitable or capable of accommodating the likely level of traffic associated with the scale of development being proposed. Safe access and egress in the case of a flood is also of concern. The proposed transport improvements required to facilitate this development are not deemed by residents to be sufficient to meet the needs of the development and will not address their fundamental concerns in relation to increased traffic, congestion, air pollution, noise etc. Pushing these issues to the application stage as opposed to addressing them prior to allocating the site is simply unacceptable.</p> <p>The site is not sustainably located with poor access to public transport links and to key services and facilities particularly on foot. This is noted to be a point raised at paragraph 10.5 of the Topic Paper.</p> <p>The transport impacts of this development are of significant concern and, when considered cumulatively with other proposed developments and allocations in the wider area, indicate that there is insufficient capacity within the highway network to accommodate this scale of development.</p>
Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p>
Environmental	<p>This allocation will result in the loss of 13.7ha of Green Belt. This land is assessed as offering strong and moderate benefits to the purposes of the Green Belt. The GB harm assessment is noted to identify that the land within the majority of the allocation makes a significant contribution to checking the sprawl of Greater Manchester, and preventing encroachment of the countryside, as well as a relatively significant contribution to the separation of Heywood and Rochdale. These are vital reasons to protect this site from development and to remove this allocation from the Plan. Developing the Site would result in high harm and increase the containment of adjacent retained and proposed additional Green Belt land. There is simply insufficient justification to release this important land parcel from the Green Belt.</p>

	<p>The impact of the form and scale of development being proposed on the landscape character of the local area is likely to be significant with detrimental visual impacts on the locale. Mitigation is unlikely to be able to overcome these concerns.</p> <p>In relation to ecology whilst the GMCA indicate that the overall ecological constraints are unlikely to be significant there is insufficient evidence available to reach this conclusion and on which to justify a robust allocation and associated policy without additional surveys.</p> <p>The effect of increased traffic could impact on air quality, alongside the impact on health and associated noise and disruption for traffic movements and general development.</p>
Historic Environment	<p>As set out above, it is noted that Crimble Mill is a Grade II* listed building. It is accepted that the building is in a poor state of repair and would benefit from investment and re-use to secure its future. In that regard an element of development within the mill could well be acceptable and could limit the impact on traffic and the environment. However, the need to secure enabling development does not in itself justify the release of Green Belt land or the scale of allocation currently being proposed. In reality, the additional development would likely only result in harm to the setting of this designated heritage asset.</p> <p>Impact on archaeology also needs further assessment.</p>
Social	<p>Any development at the site is likely to need to provide some land for the adjacent primary school to allow for future expansion and also for additional school places. The need to contribute to any capacity issues within the existing local health and care facilities would also need to be further explored; albeit the scale of contribution and where the monies should be invested remain awaiting confirmation.</p>
Requirements to overcome constraints	<p>See above comments on school places, health, contamination and flooding.</p>
Planning History	<p>It is understood that a request for scoping opinion in relation to the proposed residential development has been submitted (application ref: 19/00005/SCO) and the decision confirmed that an EIA would be required.</p>
Deliverability	<p>Section 25 of the Topic Paper indicates that the development has a negative scheme residual value of -£9.4m which is the worsened when you factor in transport costs. However, this worsening figure does not appear to have accounted for the cost of flood mitigation, ecology mitigation and contamination remediation, as well as the increased costs of rejuvenating a heritage asset. The allocation is not therefore deemed to be viable or deliverable. The reliance on unit types with higher</p>

	land values may not be meeting the identified housing needs of the local area which again could undermine the soundness of the Plan.
Anticipated timeframe for availability	The Topic Paper has not set out a proposed timescale for delivery of the Plan. However, the transport modelling is understood to be based on the period 2025 to 2040.
Commentary	
<p>This allocation will result in the loss of Green Belt land which is of significant value and will result in significant harm which has not been robustly justified.</p> <p>There are concerns that the proposed site access is unsuitable and unsafe and the increase in traffic resultant from the development will result in congestion and impacts on the local highway network. The site is not sustainably located for access to key services and facilities.</p> <p>The site is in part in an area at serious risk from flooding for which insufficient justification has been provided. The same concerns are raised in relation to ecological and wider environmental issues.</p> <p>There are significant concerns that this allocation is in fact unviable and therefore undeliverable and should not therefore be being brought forward for allocation, particularly on the basis of the evidence currently presented which is not felt to meet with the tests of soundness.</p>	

Site Assessment Newhey Quarry

Site Plan

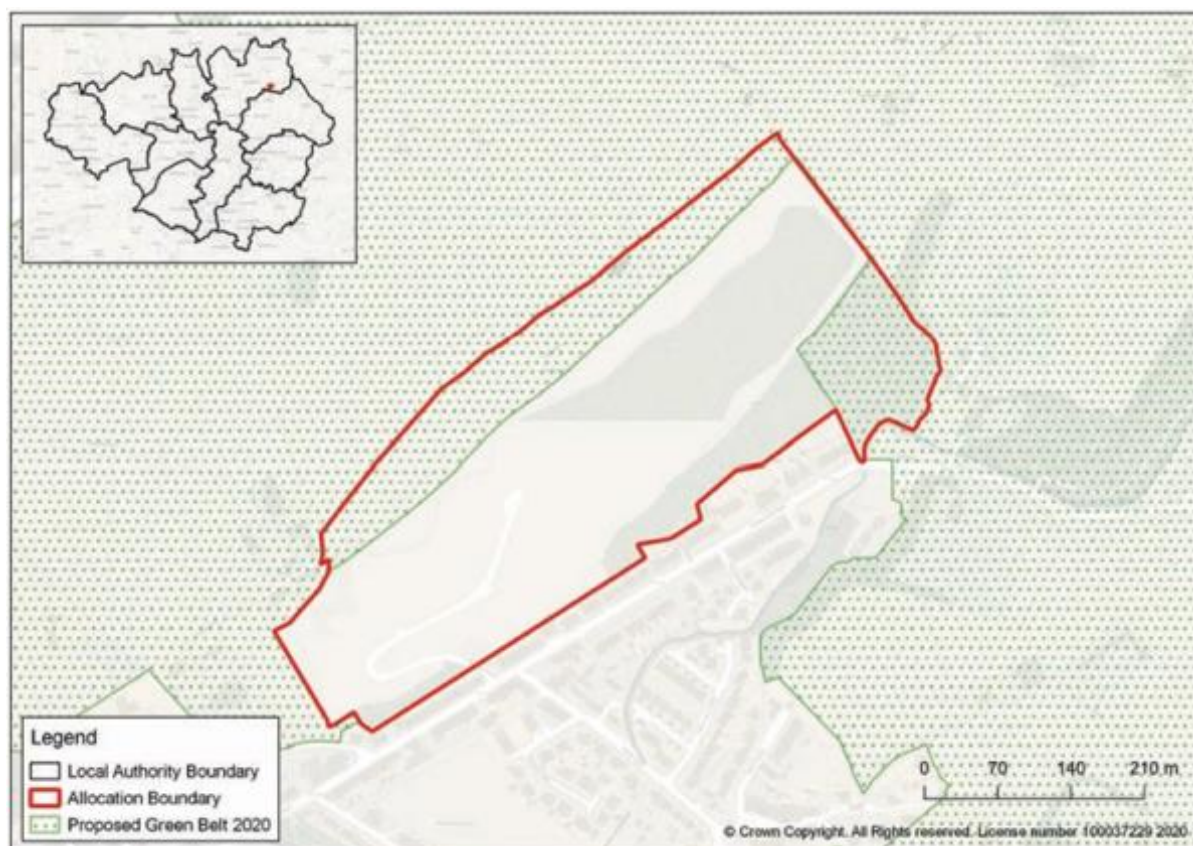


Image Source: Places for Everyone – Publication Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 23		
Landowner	Unknown but the site is being put forward by site promoters.		
Site Address	Newhey Quarry, Huddersfield Road, Newhey, Rochdale		
Postcode		Site Area (HA)	15.2ha
Description of Site	This is a former brickworks located within the Green Belt designated within the adopted Development Plan. The site is currently vacant and is understood to not have been in use for some time, although it does have existing permission for mineral extraction.		
Current Land Use	Vacant former brickworks within the Green Belt.		
Brownfield/Greenfield?	Previously developed site in the Green Belt		

Surrounding Details	
Land Uses	The proposed allocation is bounded to the south by the properties facing onto Huddersfield Road, to the east by the settlement of Newhey and to the north and east by open countryside.
Character of Surrounding Area	Whilst on the edge of the settlement the area is currently rural in character.
Constraints	
Policy Constraints	The site is within the Green Belt and has consent for mineral extraction.
Ground Conditions	<p>The previous use of the site will clearly be a significant factor in relation to the quality of the ground conditions and the remediation works required to make the site safe for residential use. The safety of ground water is also noted to be a potential issue.</p> <p>It is our view that more intensive assessments of the site contamination and associated impacts should have been carried out in advance of proposing to allocate the site for development in order to ensure the issues are fully understood and the implications on viability and deliverability are duly addressed.</p> <p>The need to reprofile and regrade the land is likely to result in air pollution, dust and noise to the detriment of neighbouring properties. The impact of changes to land levels on surface water flows and the risks to flooding of adjacent properties sited on lower ground needs to be addressed.</p>
Flood Risk and Drainage	The Topic Paper indicates that the issue of flood risk can be addressed at application stage. Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding, and the potential impact of Piethorne Brook this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed, and the concerns on surface water flooding as a result of the significant increase in hard standing on site, and the relationship with the properties on Huddersfield Road which are set lower down.
Transport	The proposed access to the site is via Huddersfield Road. Whilst the site benefits from an existing access this was clearly not anticipated to be heavily trafficked. Huddersfield Road is a busy A road often blocked when the motorway is closed or congested with numerous vehicles parked on the street in the local area, further exacerbating issues. In reality there are concerns that the settlement of Newhey and the wider highway network does not have the capacity to accommodate the scale of development being proposed.

	<p>The proximity of the new access and increased traffic in relation to the primary school is of significant concern.</p> <p>Whilst the site is well located for access to the Metrolink and bus service (albeit very limited service) there are few facilities available within Newhey itself to cater to the needs of a development of this scale.</p>
<p>Utilities</p>	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p>
<p>Environmental</p>	<p>This allocation will result in the loss of 10.9ha of Green Belt which is noted to play a significant role in the purposes of the Green Belt.</p> <p>The GM GB Harm assessment identifies that the land within the allocation makes a significant contribution to checking the sprawl of Greater Manchester (purpose 1) and preventing encroachment of the countryside (purpose 3). The allocation also makes a relatively limited contribution to maintaining the separation of Newhey and Milnrow (purpose 2).</p> <p>Release of the allocation would constitute moderate-high harm to Green Belt purposes. This harm has not been outweighed by the benefits of bringing the site forward for development.</p> <p>The area is identified as Open Moorlands and Enclosed Upland Fringes landscape character area of medium-high sensitivity. The scale and form of development being proposed will detrimentally affect this designation and will result in detrimental harm to visual amenity.</p> <p>In relation to ecology it is noted that residents have previously raised concern that the quarry is noted to provide a unique home for habitat and biodiversity. The Topic Paper indicates that the existence of specially protected species may be a constraint to development of parts of the site which would need to be mitigated and that heathland and acid grassland are important habitats which should be protected or compensated. However, no detail is provided as to how this might be achieved.</p> <p>The site is within proximity to an Air Quality Management Area and the impact of increased traffic and development could exacerbate the impacts on health. Noise during construction and from the development once completed including from traffic is also of concern to local residents.</p>

Historic Environment	There are no designated heritage assets within the allocation boundary and there are no known archaeological issues with the site, although there are designated heritage assets adjacent to the allocation boundary on whose setting the impact of any development may need to be assessed.
Social	The stress this development and the others proposed within the wider area on school places, care and health facilities, needs to be carefully considered.
Requirements to overcome constraints	As set out within this assessment.
Planning History	As set out above the site has consent for mineral extraction which was granted in 1996, and gives consent for extraction up to 2042. The need to retain and protect the existing minerals within the site is a matter which needs to be given careful consideration prior to securing an allocation, particularly in light of the on going construction material shortages throughout the globe.
Deliverability	Section 25 of the Topic Paper is noted to indicate that this development is viable with a residual value of circa£7.4m. Whilst this is understood to include transport costs it is not understood to include costs for ecological mitigation, flood risk etc and therefore confirmation is sought that the site remains deliverable.
Anticipated timeframe for availability	The Topic Paper does not set out a potential timeframe for delivery, but it is anticipated to come forward between 2025 and 2040.
Commentary	
<p>The allocation will result in the loss of Green Belt and the loss of land which offers benefit to the purposes of the Green Belt and will therefore result in harm.</p> <p>There are concerns on the safety and suitability of the proposed access and the general traffic impacts of the proposed development on the local area and highway network.</p> <p>There remain concerns with the ecological and environmental issues associated with this allocation and whether sufficient evidence has been put forward to demonstrate the soundness of the allocation and wider Plan.</p>	

Site Assessment Land North of Smithy Bridge

Site Plan

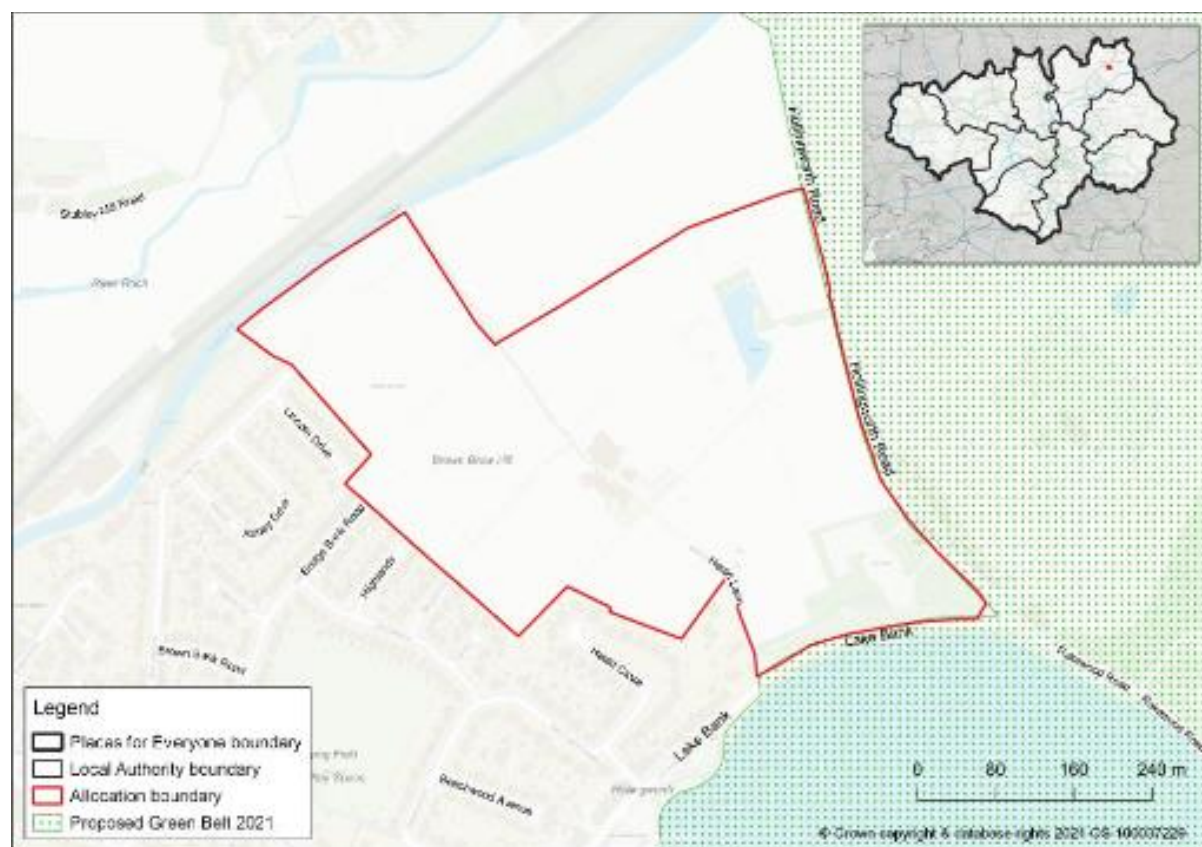


Image Source: Places for Everyone – Publication Plan 2021

Site Details		
Places for Everyone Reference	JP Allocation 22	
Landowner	Unknown but site is being put forward by site promoter Currently unknown, but it is privately owned and used as a Working Cattle farm. The site is being put forward by site promoter	
Site Address	Land off Hollingworth Road, North of Smithy Bridge, Rochdale	
Postcode	Site Area (HA)	20.4ha
Description of Site	The site is located within land designated as Green Belt within the adopted Development Plan.	
Current Land Use	Working cattle farm located in the centre of the site	
Brownfield/Greenfield?	A greenfield site within the Green Belt.	
Surrounding Details		
Land Uses	The site is bounded to the east by Hollingworth Road, by the Rochdale Canal to the north, Hollingworth Lake to the south and the urban area of Smithy Bridge to the west. The land has public footpaths and is used by both walkers and dog walkers daily. It is regularly used as a cut through from Smithy Bridge	

	to Littleborough. Footfall increased significantly during the lockdown months.
Character of Surrounding Area	The character of the local area is open and rural. situated next to Rochdale's 'jewel in the crown' Hollingworth lake, which won Tripadvisor's travellers choice award 2021. And was ranked in the top 10% of attractions worldwide.
Constraints	
Policy Constraints	The site is located within the Green Belt.
Ground Conditions	<p>The Topic Paper indicates that there are credible contaminating features, infilled water features on site including reservoir centre, former quarry, former chemical, colliery and other industrial facilities in the local area.</p> <p>The risk from these potential contaminants to the safety of the end users of the proposed development and on ground water sources if disturbed will be crucial to the developability of the site. The evidence to address these matters must be provided prior to allocation in order to address the queries on viability and public safety.</p>
Flood Risk and Drainage	The Topic Paper advises that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design. However, the report does not provide transparency on the allocations risk from flooding. Given the close proximity of existing watercourses and the existing ponding on site this issue cannot be pushed back to the application stage. It is imperative that the evidence base to support the allocation sufficiently demonstrates that the site can be brought forward for development safely in relation to both onsite and off-site flood risks. Residents have significant concerns in relation to the potential for localised surface water flooding which the evidence base does not currently address, leaving questions on its soundness.
Transport	<p>Access to the site is a major consideration for the local community particularly as the local highway network is already overburdened with vehicles and on street car parking in surrounding streets at peak times with visitors to the lake. As such any development in this location will put additional pressures on an already overstretched highway network.</p> <p>Given the mitigation measures required in the wider local area to facilitate this allocation, concerns in relation to congestion, pollution from idling vehicles and highway and pedestrian safety already exist in the local and wider community and residents do not consider that the mitigation will effectively overcome these principal concerns.</p> <p>The Topic Paper indicates that the allocation will finance a replacement visitor car park of around 300 spaces, replacing those lost and on-street spaces lost following implementation of parking restrictions. The new carpark will be situated on greenfield land next to the old visitors centre. Clarification is sought about the impact of vehicles queuing on the highway etc.</p>

	<p>It is noted that there are bus stops within close proximity of the allocation, however clarification is sought that the current service provision will be sufficient to meet the needs of a development of this scale, as well as the processes to put in place to encourage the use of more sustainable modes of transport to access this development.</p> <p>Whilst there are some limited services within the local area, for the scale of development being proposed this is not deemed to represent a sustainable location.</p> <p>The nearest metrolink is 4km away and has no direct bus route.</p> <p>The rail network already struggles at peak times, with only one or two trains per hour depending on the time of day.</p> <p>The impact on the highway network from this allocation and those cumulatively proposed within the local area will undoubtedly exacerbate an already overburdened and congested highway network, with residents' concerns that these additional developments will lead to gridlock at peak times.</p>
Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p>
Environmental	<p>The allocation of this site will lead to the loss of 18.4ha of Green Belt, and of Green belt which is noted to serve a number of purposes.</p> <p>The GM GB Harm Assessment identifies that the allocation makes a moderate contribution to checking the sprawl of Greater Manchester (purpose 1) and preventing encroachment of the countryside (purpose 3), as well as a relatively limited contribution to maintaining separation between Smithy Bridge and Littleborough (purpose 2).</p> <p>The Allocation also makes a relatively limited contribution to preserving the settlement of Littleborough (purpose 4). It should be noted that these conclusions do not appear to match the summary set out within the tabulation of impacts at paragraph 14.3 of the Topic Paper which identifies all purposes as being either moderate or strong.</p> <p>This once again raises concern in relation to the robustness of the reports and whether they are fit for purpose to justify the release of sites from the Green Belt. The Harm Assessment is understood to conclude that the release of this allocation would constitute moderate harm to the Green Belt. However, in our view this conclusion does not reflect the findings at paragraph 14.3 and the harm is in reality</p>

	<p>significant. The justification to release the land is not deemed to be sufficient or robust enough to warrant allocation.</p> <p>The site is understood to be highly variable in topography, which is characteristic of the surrounding landscape. The site is also noted to be characterised by scattered tree and woodland cover, improved grassland and varied forms of enclosure. The site is traversed by several public rights of way and is highly visible in the local area. The loss of this green space will result in significant harm to the visual amenities of the local area and the associated landscape character. There can be no mitigation sufficient enough to address this major concern.</p> <p>In relation to the matter of ecology the site is adjacent to the Rochdale Canal which is noted to be a Special Area for Conservation and a Site of Special Scientific Interest (SSSI) due to flora and fauna within the vicinity of the canal. There are ponds on site which could be suitable for great crested newts and water voles, and the existing vegetation offers opportunity for other protected and priority species. Whilst the Topic Paper states at paragraph 18.3 that there are no known ecological constraints which are so important as to preclude the allocation of the site, this statement at this time cannot be justified or substantiated and therefore the allocation is being proposed on an unsound and incoherent evidence base. Without mitigation re-evaluation being carried out to address these crucial issues and suitable clarity on the potential scale of development, the decision has to be made to object to this proposal.</p> <p>The impact of increased traffic in the local area as a result of the development and the associated increase in air pollution, light pollution and noise from vehicles, traffic movements and general disturbance must be factored into the decision making process.</p> <p>Impacts on the amenity of proposed residents from the railway also needs further detailed consideration.</p>
<p>Historic Environment</p>	<p>There are no known designated heritage assets within the allocation boundary, however there are some within the local area whose character and setting will need to be preserved.</p> <p>The potential impact on archaeological features is also noted to be a consideration.</p> <p>As it stands, given the scale and form of development being proposed, there is real concern that this development will result in harm to the historic environment and harm to an extent that cannot be justified. The proposal to retain the historic buildings at Lower Cleggswood Farm is welcomed, however the wider development irrespective of a buffer zone will still result in an excessively dominant and harmful development.</p>
<p>Social</p>	<p>As set out below the development will add pressures to the existing local education system and there remain substantial</p>

	<p>concerns that the mitigation proposed will not be sufficient when considering the cumulative impact of all proposed allocations within the local area and their ability to meet the needs of existing and proposed residents</p> <p>These concerns equally apply in relation to health and care sectors and the additional pressures from the significant number of new residents both from this allocation, and others within the vicinity will place on an already overburdened system.</p>
Requirements to overcome constraints	Capacity to facilitate the delivery of a new primary school, associated outdoor playing space and car parking, and provisions for additional primary and secondary school places. Necessity to retain and improve car parking facilities that will accommodate visitors to the lake
Planning History	A screening opinion for a residential development of 350 dwellings, a primary school and associated works (application ref: 19/00910/SO) was submitted in 2019. The decision issued in January 2020 was that an EIA would be required.
Deliverability	<p>Despite the fact that this site is proposed to deliver a high quality housing scheme and the positive impact the local setting will have on land values, it is noted that the viability assessment demonstrates a negative residual value of -£1.6m which worsens to -£4.2m when the transport costs are included.</p> <p>However, it is uncertain whether this residual valuation also assesses the impact of other contributions from environmental mitigation including landscaping, the effect of the buffer on the existing farm, ecological mitigation, flood mitigation etc. The fact that the development is already seen to be unfeasible without these additional costs would indicate that the plan is simply not deliverable. A proposed increase in sales values of 10% would appear to be placing undue reliance on the housing market to deliver the finances to support the development and cannot be seen as being a robust approach to justifying development.</p>
Anticipated timeframe for availability	There is no clarity on anticipated commencement dates but the transport assessment is noted to be based on the period 2025-2040.
Commentary	
<p>The site will result in the loss of land currently falling within the Green Belt. This will result in substantial harm which has not been sufficiently justified as a case for exceptional circumstances.</p> <p>The development raises significant concerns in the local community in relation to traffic impacts, highway safety, congestion, on street car parking and wider demands on the whole travel infrastructure.</p> <p>There are multiple environmental issues with the development including the lack of clarity on the matter of flood risk, ecological impacts and the impact of the development on heritage assets and landscape character.</p>	

The development has been shown within the GMCA's own evidence to be unviable, meaning it is unlikely to be deliverable and is therefore not deemed to be appropriate for allocation.

The evidence base associated with this allocation is not robust enough to meet the test of soundness.

Site Assessment Roch Valley

Site Plan

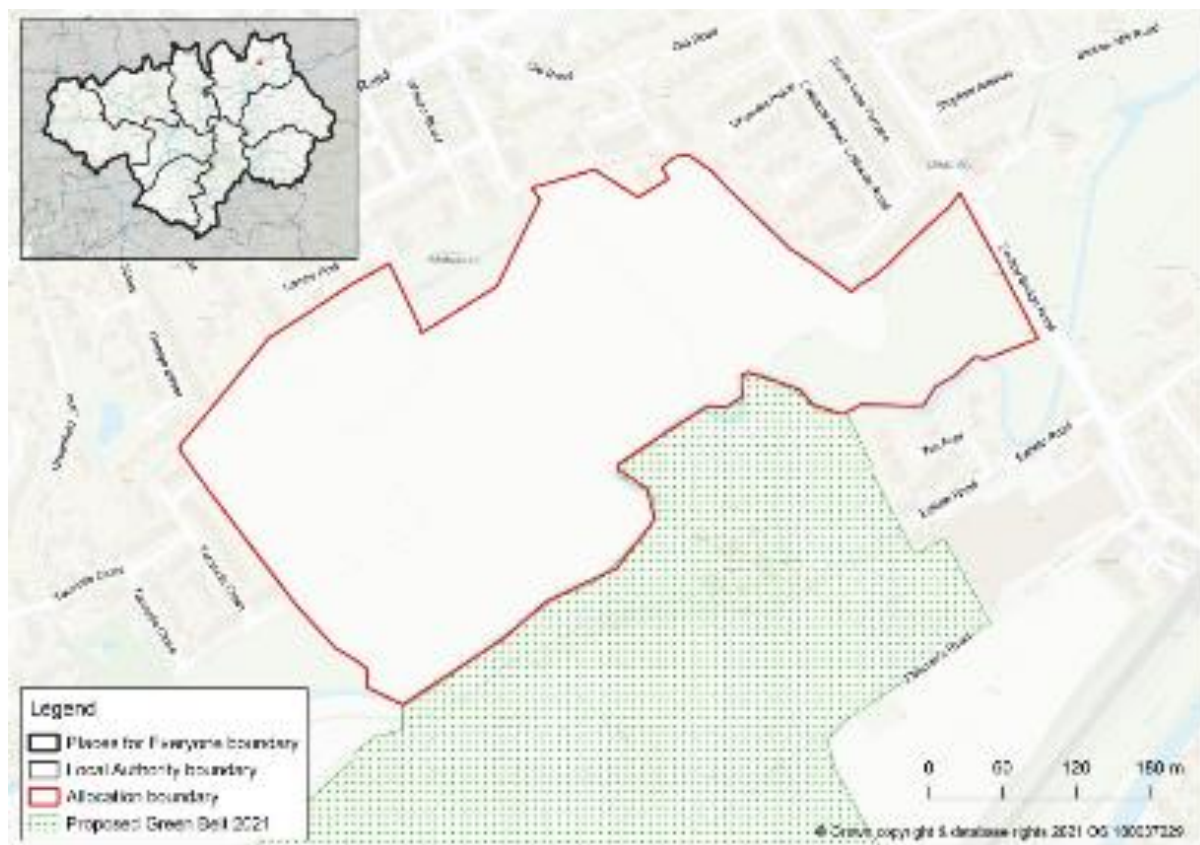


Image Source: Places for Everyone – Publication Plan 2021

Site Details		
Places for Everyone Reference	JP Allocation 24	
Landowner	Unknown	
Site Address	Land off Smithy Bridge Road, Hurstead, Rochdale	
Postcode	Site Area (HA)	14ha
Description of Site	The site is currently designated as Protected Open Land within the adopted Development Plan.	
Current Land Use	This greenfield site is currently vacant.	
Brownfield/Greenfield?	Greenfield site allocated as Protected Open Space	
Surrounding Details		
Land Uses	The site is noted to be bounded by urban development to the east, north and north west, with open countryside to south and south west. The site is bounded by the River Roch on the southern boundary. The site houses an underground sewage tank. This was deemed not suitable by United Utilities 6 years ago and they had to insert and build 3 more tanks. This work impacted the area greatly and the land was used as feed for the livestock the landowner has that grazes further down the	

	land away from the river. The tanks are accessed frequently by united utilities and large machinery used.
Character of Surrounding Area	The site is on the urban fringe but the southern and western portions of the site are rural in character.
Constraints	
Policy Constraints	The site is designated Protected Open Land.
Ground Conditions	The site is a within a class 1 Radon area, but there are no known ground contaminants; albeit potential for ground water contamination which would be worthy of further exploration.
Flood Risk and Drainage	<p>The Topic Paper indicates at paragraph 4.2 that the allocation itself is not at risk from flooding although land to the north of the River Roch has been identified by the Environment Agency and the council as a location where flood water storage capacity should be safeguarded to enhance flood alleviation benefits for the wider catchment area. However, no clarity is provided in relation to the scale of flood storage needed and where within this allocation this is to be located. The fact that the allocation is adjacent to an existing river and the areas on which it is situated currently provides important flood storage capacity raises significant concern (1) as to whether the site is safe and suitable to accommodate the scale of development proposed and (2) the impact developing this site has on flood risk further downstream and within the wider local area. With increased surface water flow rates also resultant from the development, these issues need to be addressed prior to allocation to ensure that the site is safe, suitable and deliverable.</p> <p>Given that the southern portion of the site is noted to be within flood zone 3 with a high probability of flooding these issues are of even greater concern and as to whether the allocation is appropriate and justified, particularly as paragraph 11.3 of the Topic Paper considers that the site is only likely to pass the exception test but it cannot be demonstrated at this point that it actually will pass the exception test. In 2019 the area south of the site in flood zone 3 flooded again quite severely and much further down river too affecting much of the proposed site.</p>
Transport	<p>The Topic Paper indicates that the proposed allocation will not have a severe impact on the local network but that mitigating works will be required to ensure this. The proposed mitigation works are noted to be extensive and include the creation of new junctions, local junction improvements, provision of a toucan crossing and bus stop upgrades. This represents significant alterations to the highway network with potential knock on implications on traffic flows and congestion. These concerns are intensified once the cumulative effect of the wider development proposals for the local area are taken into account.</p> <p>Residents consider that the traffic to be generated by the proposed allocation will be substantial and of a sufficient level to justify not allocating the site for development. The proposal of supporting infrastructure will impact on already congested roads and significantly contribute to increased air pollution in</p>

	<p>an area used by local children to use as a safe place to walk to school.</p> <p>Whilst there are some limited services and facilities in the local area the site is currently not deemed to represent a sustainable form of development,</p>
<p>Utilities</p>	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p> <p>It is further noted within section 13 of the Topic Paper that diversion works will be needed for all utility services including BT to form the proposed new main site entrance. The major costs associated with these works should be factored into the development viability assessment.</p>
<p>Environment</p>	<p>The allocation has been identified as not resulting in the loss of Green Belt, however it will result in the loss of Protected Open Land, and the impact of this loss should be assessed in much the same way as you would assess harm on the Green Belt, particularly where it is currently a functional green gap between Hurstead and Smithy Bridge.</p> <p>The allocation is identified as being within the Pennine Foothills (West & South Pennines) and of medium sensitivity for residential development. Whilst the LVIA indicates that the impact on landscape character and landscape features are not significant, given the prominent location of the site and the number of vantage points including from Public Rights of Way from which the site can be viewed the reality is that this allocation will result in detrimental harm to visual amenity and the quality and character of the Green Belt. The relationship between the development and the visual setting and character of the River Roch is also deemed to be substantial.</p> <p>In terms of ecological impact it is noted at paragraph 18.2 of the Topic Paper that the development of the site may potentially have an indirect recreational disturbance effect on the South Pennines SAC/SPA and that this will affect specifically protected species including bats, newts, badgers and water voles and other protected habitats within the allocation boundary</p> <p>The Topic Paper acknowledges that additional surveys will be required and it is our view that these are essential and should be provided at this stage, prior to allocation of the site such that the impacts of the development on the wider environment can be appropriately assessed. The impact on the ecological network associated with the River will be significant.</p> <p>The impact of the development on noise and levels of air pollution within the local area are also of concern and will clearly be exacerbated given the scale and form of development being proposed. The potential for water pollution</p>

	to the River Roch from run off does not appear to have been considered at any point.
Historic Environment	<p>There are no known designated heritage assets within the allocation boundary. Although there is noted to be potential for archaeological finds connected to prehistoric remains, possible early 19th century cottage and late 19th century coal pit. The location of, and potential impact on these historic finds needs to be duly considered in relation to the potential impact on site layout and development area of the site.</p> <p>It is noted that Green Farmhouse, cottage and attached farm buildings should be preserved and any development should not be overly dominant and plan and design should respect the rural character. The same is noted to be required in relation to Dobwheel Mill and views to and from Clegg Village Conservation Area.</p> <p>Whilst there are no heritage assets on site (other than potential for archaeology) it is clear that the development of this site has the potential to result in significant harm to the character and setting of a number of historic buildings and designations. Further work should be undertaken to assess the impact on these important assets.</p>
Social	<p>As per a number of other allocations within Rochdale the impact on school place provision is a very significant concern for the local community. Whilst some additional provision is being suggested, there is no clarity that it will meet the needs of existing and future residents entirely.</p> <p>Whilst in relation to health, the Topic Paper indicates that there is sufficient existing capacity within the local area to accommodate growth from this development and potential wider development, residents remain concerned that cumulatively the scale of development being proposed within Rochdale is excessive and will place undue demand on health and care services which as we all already know are under significant strain.</p>
Requirements to overcome constraints	Please see comments above
Planning History	Attention is drawn to planning application reference 19/00881/FUL which was submitted for the construction of 200 dwellings with associated public open space and landscaping. The application is understood to remain live and awaiting a decision.
Deliverability	<p>It is noted that this site was not included within the Strategic Viability Report – Stage 2 Allocated Sites Viability Report (October 2020) as the site is the subject of a live planning application. However, the application remains awaiting a decision and the need to ensure deliverable sites is at the forefront of the plan making process.</p> <p>Whilst once again the proposal appears to indicate a preference for high value worth units, we would question whether this is meeting the identified local housing need and</p>

	whether the land values are sufficient to overcome the significant environmental issues with this site.
Anticipated timeframe for availability	There is no proposed delivery timeframe set out for this site, however the transport assessment is noted to relate the period 2035 to 2040.
Commentary	
<p>Whilst the site will not result in the loss of Green Belt land it will result in the loss of Protected Open Space. The site provides an important visual gap between settlements and its loss will result in significant detrimental harm to the local area.</p> <p>Given the scale of development being proposed, and when assessed in light of the other proposed allocation local residents are gravely concerned about the effects on the highway network and the associated congestion, pollution and highway safety issues.</p> <p>The site contains an area at risk from flooding and is one of the crucial concerns with the proposed allocation of the site. The impact of loss of flood storage area both on the site, to public safety and flood risk downstream is likely to be very significant and there is insufficient evidence provided on how the developers will overcome this principle concern.</p> <p>There are clearly multiple other issues with the allocation of this site including impact on the wider environment, local ecology and visual amenity all of which are issues that remain unresolved. The lack of a robust evidence base to support this allocation simply renders the proposals to be unsound.</p> <p>The development of this area will directly impact local children that use the space to walk to and from school safely. The air pollution will be significant to these children as traffic will add to already congested roads. The site is regularly used by United Utilities as there are ongoing problems with the existing tanks that have been built. This would need to be taken into consideration as it would impact directly on movement in this area.</p>	

Site Assessment Stakehill

Site Plan

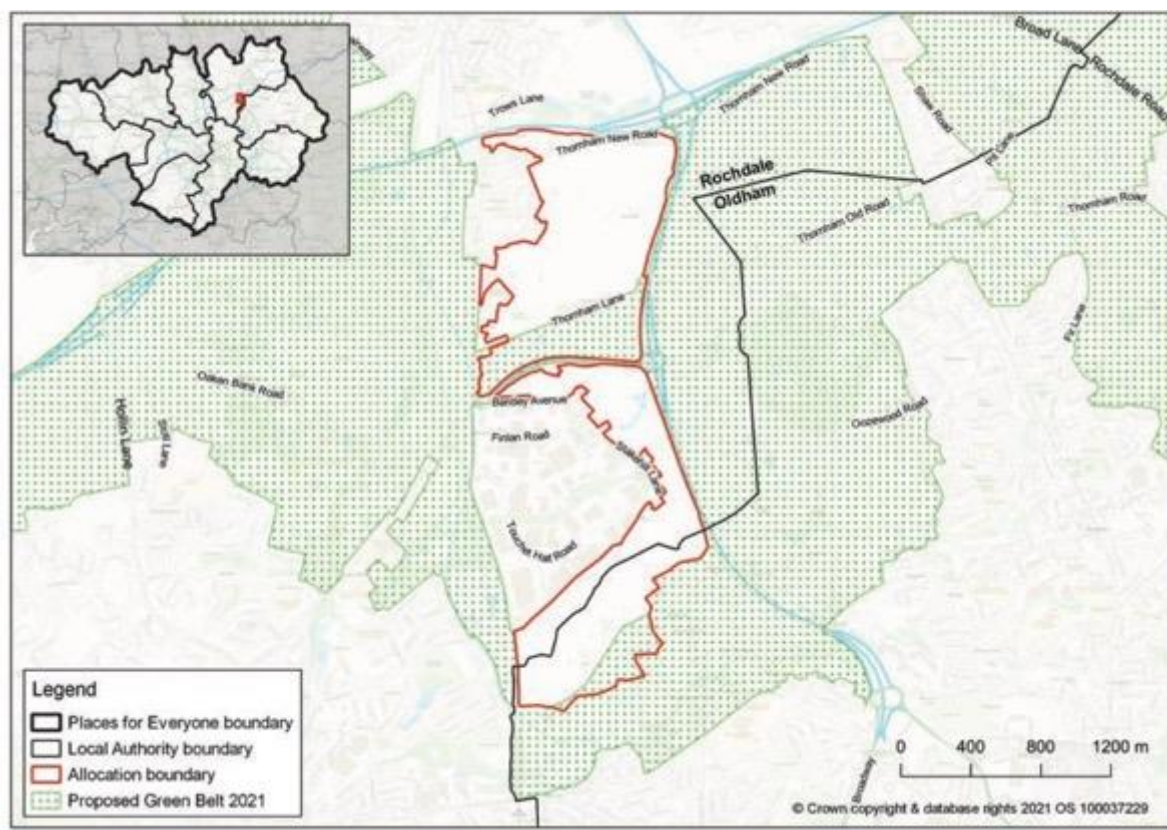


Image Source: PfE – Consultation Plan 2021

Site Details			
Places for Everyone Reference	JP Allocation 2		
Landowner	The Stakehill Allocation Topic Paper (SATP) fails to state who owns the land. Ownership is held by at least eight different landowners: three/four working farmers; a PLC; a family trust; three individuals/families and with key access (from the north) coming through the All-in-One Garden Centre		
Site Address	Split into North (bordered by M62 to north, A627M to east, A627M Slattocks Spur to south, A664 Rochdale Rd to west) & South (A627M Slattocks Spur to north, A627M to east, farmland towards Chadderton Heights to south, Rail line/Stakehill Ind Est to west). These should be presented as two separate sites split by the A627(M)		
Postcode	Various M24/OL11	Site Area (HA)	200 ha
Description of Site	The site is currently designated as Green Belt within the adopted Rochdale Core Strategy and Oldham Local Plan		

	(currently being updated). The site is largely vacant Green Belt other than existing farmsteads and a garden centre business.
Current Land Use	Predominantly vacant Green Belt but with some scattered development as detailed above albeit limited to appropriate developments within the Green Belt and within a mineral safeguarding area. The land is Grade 4 agricultural land which is currently used for grazing and grass crops.
Brownfield/Greenfield?	Green Belt, other than the structures and uses referred to above.
Surrounding Details	
Land Uses	<p>The site lies between Royton and Middleton, across the boundary of the Oldham and Rochdale Local Authority Areas and 5km south-west of Rochdale and 5km north-west of Oldham. The site is around 200ha in size, and is split into two separate allocations north and south of the A627(M) Junction 2:</p> <ul style="list-style-type: none"> •GMA2 Stakehill (north): this part is 108.6ha in size and bounded by A627(M) to the south and east, M62 to the north and Manchester Old Road to the west. • GMA2 Stakehill (south): this part is 93.7ha in size and bounded by A627(M) to the north and east, Stakehill Industrial estate to the west and Chadderton Fold to the south. <p>The above is quoted directly from the SATP. It immediately refers to the site as “<i>two separate allocations north and south</i>”. Section 26 Phasing indicates a three-pronged approach to the JPA2.</p> <p>We submit that although agreeing there is a linked infrastructural element to JPA2 as a whole, along with upgrades/additions mentioned elsewhere, JPA2 should be seen as two/three separate allocations and dealt with accordingly. Policy JPA2, para 7, indicates the creation of a natural separation (Green Belt/wildlife corridor). This, along with the A627M Slattocks Spur, provide an obvious north/south divide to the allocation as proposed. This is not a sustainable location.</p>
Character of Surrounding Area	<p>The allocation whilst on the urban fringe with the settlements of Slattocks, Stakehill, Chadderton Heights, Boarshaw, and Chesham Estate, is rural in character.</p> <p>We submit that the natural separation of these settlements, and that at Thornham Fold, would be significantly compromised and is contrary to PfE plan paras 8.2, 8.56, 8.61, Policy JPA2 para 14, NPPF para 138b & c.</p> <p>We also submit that Thornham Fold will not be treated “<i>sensitively</i>” and there will be “<i>an unacceptable impact on local roads</i>” (NPPF para 85). The proposals would damage the identity of the existing settlements.</p>
Constraints	

<p>Policy Constraints</p>	<p>The site is within the Green Belt and borders (North section) a Grade II listed Church which is protected. This section also borders the Thornham Cricket Club which should be afforded protection as a sporting facility.</p> <p>Spatial Aspect: There are no exceptional circumstances to redraw Green Belt boundary in respect of JPA2 as Rochdale Council have failed to examine all the alternatives including:</p> <ul style="list-style-type: none"> • Optimising the density of developments: Rochdale are not building to the recommended densities in the sites within 400m and 800m of current transport hubs and town/local centres. • There is a significant 74 acre Brownfield site, the former Turner Newall Asbestos Ltd at Healey and desperately in need of remediation/regeneration. • JPA2 fails to comply with 6 of the 7 Site Selection criteria. It only complies with Criteria 7 Land that would deliver significant local benefits by addressing a major local problem/issue. • Building on this Green Belt site does not comply with promoting sustainable development, it is the complete opposite and causes multiple problems in the area • Loss of protected Green Belt including: <ul style="list-style-type: none"> ▪ Loss of public access to green space ▪ Increased congestion on roads. Peak period traffic is currently 900 cars/ hour. ▪ Increased urban sprawl by the addition of 1,680 houses & expansion of employment space. ▪ Significant deterioration in air quality near an AQMA and a primary school ▪ Increased pollution and CO2 from additional buildings and traffic ▪ Increased flooding risk ▪ Loss of a carbon sink ▪ Poor access to GP surgeries ▪ Risk of unsafe building on old mine workings ▪ Loss of ancient hedgerows ▪ Loss of habitats for wildlife <p>The NPPF para 120, Planning policies and decisions should: <i>"b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;"</i></p> <p>We submit that proposed development at JPA2-Stakehill does conform will the NPPF as quoted.</p> <p>The SATP para 14.12 states <i>"Whilst the assessment concludes that its release would result in some harm to the</i></p>
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	<p><i>Green Belt the council's consider that the benefits ... outweigh its overall harm, including its Green Belt harm, representing exceptional circumstances in accordance with national planning policy. The exceptional circumstances are set out in the Green Belt Topic Paper " . We do not consider exceptional circumstances as per the NPPF para 137 have been demonstrated, specifically: before concluding that exceptional circumstances exist ... all other reasonable alternatives have been explored for meeting identified needs for development ... Maximise opportunities on previously developed land and underutilised land ... Optimised densities on sites at accessible locations within the existing land supply.</i></p>
<p>Ground Conditions</p>	<p>The Northern section slopes downwards from the North & East with several undulations and gullies and currently comprises open fields with some limited buildings. It contains a number of ponds, some dating from 1600's, a number of natural springs and field drains</p> <p>The allocation abuts a number of old mine workings which is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed.</p> <p>The potential for ground contamination particularly from adjacent uses and impacts on ground water and safety of the development on site need to be more carefully considered prior to the allocation of the site. The SATP para 12.2 states "... a Preliminary Risk Assessment (PRA) would still be required to determine whether any further intrusive investigations are required to establish if and what remedial techniques are necessary to ensure the site is suitable for its intended end use. This would be a condition relating to any future planning approval".</p> <p>And para 12.3 "The site promoters for the northern part of the allocation, which would be housing, ... recommends that a Phase II Geo-environmental Site Investigation is undertaken in order to qualitatively assess any potential contamination".</p> <p>Para 12.4 goes on: "The site promoters for the land to the north and east of Stakehill ... recommends that further targeted investigations be carried out on parts of the site e.g. pond, motorway embankments and further areas that may have been backfilled."</p> <p>These measures should be undertaken prior to deciding if the allocation is viable and this lack of process does not offer confidence.</p>
<p>Flood Risk and Drainage</p>	<p>There are several natural springs, ponds, and field drains throughout the allocation site. Recent adverse weather events/conditions have seen areas adjacent to the site often flooded from both surface water run-off and higher than average water table levels. The limited flood risk assessment significantly underestimates reality and acknowledges further detailed survey work is needed. This</p>

	<p>ends up as regular spills from Church Avenue and Bentley Avenue onto the main A664 Rochdale Road and causing very difficult driving conditions at Slattocks Roundabout. Whilst drainage works have been undertaken at the roundabout the problem has not been resolved as proved following further heavy rainfall.</p> <p>Replacing the green fields which act as a soakaway with the hard standings for housing and impermeable roadways/pavements is likely to result in a significant increase in the severity of the flooding. Combined with an antiquated main sewerage/drainage system there is likely to be many more frequent incidences of flooding. If the natural soakaway is lost this will severely exacerbate the flooding which is already occurring regularly. Mitigation through the use of SUDS and semi-permeable vehicle standings will not adequately compensate. The proposed expansion of Stakehill Ind Estate will exacerbate the effects of water run-off significantly causing greater problems further down watercourses which continue through Manchester City Centre.</p> <p>The L1 Strategic Flood Risk Assessment for Greater Manchester states that Rochdale is amongst the worst areas for high flood risk.</p> <p>The SATP para 11.4 states: <i>“It was concluded that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage”</i>. This leaves questions about the viability of this site unanswered so its inclusion in the PfE plan is unsound. It is of vital importance that detailed investigation, modelling and master planning needs to be undertaken prior to any development. A desktop survey and “look at it later” attitude is not satisfactory when producing plans of this scale.</p> <p>Whilst the indicative plans for the allocation show some mitigation measures (SUDS, permeable vehicle standings – for houses, etc) it remains unclear whether these will be sufficient.</p> <p>Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed, and the concerns of surface water flooding with the significant increase in hard standing on industrial section of the allocation.</p> <p>Data warns of more frequent flooding events <u>UK extreme events - Heavy rainfall and floods - Met Office</u>.</p>
<p>Transport</p>	<p>The allocation currently has limited accessibility to public transport within the designated parameters. The existing junction of the A627(M) is already rated as poor. The investigation of a new rail station at Slattocks is welcomed but is being used to justify the scale of development as,</p>

	<p>only when it is a reality, can the allocation be said to be properly accessible and within the criteria used in GMAL calculations. We submit that the use in GMAL of the boundary of the allocation site as a 'distance to' public transport access points is unrealistic and inappropriate. It uses a straight line to/from those points. These are unrepresentative of real-life conditions and could see commuters' journey distances/times to the nearest access point increased dramatically. They should therefore be recalculated for factual authenticity.</p> <p>There is no rail (proposed station) or Metrolink to the area, very limited bus services (particularly Southern employment section) and the local highway network is already severely congested at peak times. Local traffic based on 1,680 homes, suggests anywhere between 1,500 to 4,000 extra private vehicles given the scale of housing & employment space proposed. This will further increase with deliveries to properties and HGV movements to the expanded employment site.</p> <p>Many parents will drive their children to school due to time constraints/safety issues. The proposal to increase the bus service to Stakehill Ind Est is an aspiration with no evidence this will definitely happen.</p> <p>The Transport's Locality Assessment Addendum-Cross Boundary-Stakehill (TLAA-CB-S), shows that pre (Table 8) and post mitigation measures (Table 10), which are merely suggestions, traffic (M62 J20, A627M/A664 Slattocks, A627M/Broadway/Chadderton Way) will continue to be over capacity 'limits' at peak times. Para 12.1.11 states <i>"further modelling work will be required to support the Transport Assessment for the allocation..."</i> whilst Para 12.1.6, in relation to junction capacity, states <i>"a figure of 100% or over illustrates that flows exceed the operational capacity at the Junction and increased vehicle queuing and delay are likely to occur"</i>. This is the case pre and post mitigation.</p> <p>Further strain and knock-on effects will result to the Local Road Network (LRN) on the A664 (North & South) and A6064 from JPA1.1 & 1.2, JPA Castleton Sidings, and JPA25 Trows Farm. This is in addition to other (non-PfE) planned developments in Castleton (Royle Road, Nixon St/Carcraft – circa 300 homes). Furthermore, the proposed cycle lane will narrow the highway through Castleton centre causing a potential traffic bottleneck on the principal route between Rochdale & Manchester. These issues should be addressed as a matter of urgency before this site is given further consideration</p> <p>TLAA-CB-S (para 4.3) suggests <i>"a new southerly link to Mills Hill station could form part of any expansion of the industrial estate"</i>. No modelling or associated investigations are presented for this.</p> <p>The TLAA-CB-S (para 9.1.4) uses a number of irrelevant junctions in its assessment. Ref 7- Boarshaw Lane/Stakehill Lane is immediately dismissed.</p>
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	<p>Ref 6-Thornham Old Road/Oldham Lane would not be used as access to JPA2-Stakehill. It is an unadopted Public Bridleway, principally providing access to local farms at Thornham Fold, East of the allocation.</p> <p>The document also references ‘Proposed para 6.1.4 “<i>Resurfacing of the unpaved sections of Boarshaw Lane and Thornham Lane is also proposed</i>”. No sections of either of these Lanes is currently paved.</p> <p>Frequent issues (accidents/closures) on the SRN M62, J18-21 cause major problems on the A58/A664 around Castleton and other parts of the LRN through Middleton, Heywood, Milnrow, Newhey, Shaw, and Royton.</p> <p>TLAA-CB-S Section 7 - Parking, notes that Rochdale & Oldham are yet to agree on parking standards for developments.</p> <p>TLAA-CB-S Section 8 - Allocation Trip Generation and Distribution, Table 4, shows a ‘Development Quantum’ residential build to 2025 of only 55 homes and a total of 1,736. This total figure does not match the allocation proposals of 1,680 and no explanation is given for the difference.</p> <p>Table 5 - Allocation Traffic Generation only gives figures for passenger cars “<i>Units are in PCU (passenger car units/hr)</i>”. This excludes commercial vehicle movements.</p> <p>The proposed expansion of Stakehill Ind Estate and potential inclusion of a lorry park (Policy JP Allocation 2, para 13), by over 150% would result in a significant increase in commercial vehicles entering/exiting the LRN and SRN. This would all use the Slattocks Roundabout junction (no other entry/exits are planned for) further contributing to traffic movements and potential congestion issues.</p> <p>The first sentence of TLAA-CB-S para 9.13 makes no sense – it is just wrong.</p> <p>TLAA-CB-S para 10.1.3 makes irrelevant mention of JPA16-Cowlshaw. Its location would not be expected to have any effect on traffic in/around JPA2-Stakehill.</p> <p>TLAA-CB-S para 14.1.3 states “<i>Junction modelling has however demonstrated that the Junction will operate within capacity at 2040.</i>” There is failure to explain how this conclusion has been reached.</p> <p>TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the “<i>17A serves Stakehill in peaks</i>”. It is a single time service at approximate 05.30 Monday to Friday only.</p>
<p>Utilities</p>	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site and is therefore the allocation fails the test of soundness.</p>
<p>Environmental</p>	<p>The site will result in the loss of 167.4ha of Green Belt. The site is noted to perform strongly in relation to a</p>

	<p>number of purposes for allocating land as Green Belt and the Green Belt harm assessment is noted to conclude that the allocation site plays a moderate to relatively significant role in respect of checking the unrestricted sprawl of the large built-up area and preventing encroachment on the countryside.</p> <p>The Stakehill Allocation Topic Paper, Section C- Environmental (14 Green Belt Assessment), confirms, throughout the Section, that “<i>The assessments considers that release of the allocation would cause ‘high’ harm to Green Belt purposes, but would only have a ‘minor’ or ‘no/negligible impact on adjacent Green Belt.’</i>”</p> <p>The allocation is close to Tandle Hill Country Park which provides a highly attractive local viewpoint and whose visual amenity is likely to be detrimentally affected by the development of this site. The proposed mitigations are unlikely to fully mask the development.</p> <p>In relation to ecology, it is noted that the GMCA’s appraisal indicates that any ecological constraints on the site are unlikely to be significant but further surveys are required. It is our view that the evidence base on this important issue is somewhat lacking and is not robust enough to currently warrant allocation of the site.</p> <p>The resultant harm from the release of this Green Belt is significant and the use of ‘exceptional circumstances’ (NPPF para 61 & 160) have not been demonstrated to justify the allocation of this site. Increased urban sprawl in contravention of NPPF para 141. The impact on air pollution and noise pollution from the extensive additional traffic resultant from this development is also of concern to local residents both in its impacts on future residents and on those in the local area. Coupled with this is the fact that there is an AQMA outside a primary school within 150m of the southern end of the site allocation. This will be exacerbated by the fact that proposed residents are likely to need to travel by private car to access key services and facilities etc due to this being an unsustainable development.</p> <p>We welcome the Plan’s aim contained in Policy JP-S 2 Carbon and Energy. However, its emphasis is on housing and suggests there is insufficient focus on industrial, who are higher-level users of energy. Businesses should be encouraged to use green technologies such as PV/air/ground-source heating and/or green roofing. Green roofs have the added advantage of masking large distribution-type units from distant/high viewpoints. Using PV on roofs means that green fields are not needed for this purpose, as has been seen across the UK, leaving them available for agriculture/leisure/environmental functions.</p>
<p>Historic Environment</p>	<p>The Topic Paper draws attention to a Historic Environment Assessment created to support the Plan. This sets out a</p>

	<p>number of recommendations for this allocation including on archaeology and the need to protect existing sites and assets. The need to protect the historic environment from inappropriate development needs to be clearly addressed prior to allocation of the site. Without detailed knowledge of what the site contains and associated impacts on the historic environment should assets be found then the site should not be promoted as identification could make the site un-deliverable.</p> <p>The loss of fields, hedges and trees across the allocation will have a negative impact on the local green infrastructure. The majority of this land has been farmed for centuries and the fields, paths and hedgerows are relatively unchanged from early maps. They form an intrinsic part of the character of the area and help delineate the existing settlements from one another. The GMA2 - 4 Stakehill (North) Ecology report states that further in-depth assessments need to be undertaken. This should be done prior to further consideration of this allocation site.</p>
Social	<p>The development on the Northern section of the allocation will adversely and significantly impact on the setting of the 150+ year old Thornham Cricket Club, reducing its natural rural outlook.</p> <p>The COVID-19 pandemic has meant that the public footpaths and byways across the area have seen significantly increased usage. Whilst this has declined, it remains at higher than pre-COVID levels (anecdotally). It contributes to the physical and mental health and well-beings of both local residents and visitors to the area.</p> <p>This is in contradiction to Policy JP-P 6: <i>“To help tackle health inequality new development will be required, as far as practicable, to:</i></p> <p><i>A. Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;</i></p> <p><i>B. Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice.”</i></p>
Requirements to overcome constraints	<p>Proposed expansion of primary schools in the local area is limited to St John’s CofE on Thornham Lane. This school has just (September 2021) completed a building reconfiguration/expansion. Further expansion would again create additional disruption to the education of its pupils.</p> <p>There is no mention of increasing capacity at other schools close by and no solid mechanism for improving service provision to support the proposed development.</p> <p>Secondary schools are full. This development will only worsen existing pressures. This applies in equal weight to existing health care services. The nearest GP surgeries are under strain, which will only increase with the proposed increases to the local population. A national shortage trained GPs is a known fact. (Chronic shortage of</p>

	<p>GPs is the reason patients are facing long waiting times for appointments (rcgp.org.uk). Thus in the short/medium term “<i>the provision of additional ... medical facilities</i>” could remain an ambition rather than reality.</p>
Planning History	<p>There have been a number of small-scale planning applications (house extensions; repurposing farm buildings; changes/upgrades to industrial units on Stakehill Ind Estate; extension at Thornham Cricket Club). The site is virtually all undeveloped Grade 4 agricultural land adjoining farm buildings/businesses.</p>
Deliverability	<p>Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. Access to the Northern section of the site via the secondary route, Thornham New Road, is made difficult by the narrowness of the roadway. No mitigation has been proposed for this.</p> <p>The possibility of a new rail station at Slattocks is not certain. Further modelling and the securing of funding needs to be undertaken prior to the development going ahead.</p> <p>There appears to have only been a desktop flood risk assessment along with a very limited wildlife study – desktop and one day on-site visit – which give an incomplete description of the actual situation.</p> <p>Current traffic issues have not been taken into account and will not be addressed by PfE.</p> <p>There is potential for regionally significant archaeological remains within the site. A full report on the ecology has been deferred.</p> <p>Local flooding, ground conditions, and the geology of the area has received a scant consideration and should be fully investigated prior to further progress towards proposed development.</p> <p>Local Housing Need is being overridden by the proposal.</p>
Anticipated timeframe for availability	<p>Unspecified although the transport modelling is noted to relate to the period 2025-2040</p>
<p>Commentary</p> <p>This allocation will result in the loss of a large area of Green Belt and the resultant harm is deemed to be significant. The GMCA have not presented a sufficiently robust argument to make the case for exceptional circumstances and as such it is our view that the site should not be being released for development.</p> <p>There are significant concerns in relation to traffic levels and impact on the safety of the highway, as well as concerns on congestion, air pollution and general noise and disruption.</p> <p>The site may have archaeological value and does have an ecological significance, neither of which have been robustly addressed within the supporting documentation.</p>	

In short, the proposed allocation of this site has not been robustly supported with a suitable evidence base or sufficient justification provided in relation to exceptional circumstances for release. The allocation is therefore likely to be found to be unsound.

Site Assessment Trows Farm

Site Plan



Image Source: Places for Everyone – Publication Plan 2021

Site Details		
Places for Everyone Reference	JP Allocation 25	
Landowner	Unknown but the land has been put forward by a site promoter	
Site Address	Land off Trows Lane, Castleton Moor, Rochdale	
Postcode	Site Area (HA)	21.2ha
Description of Site	The site is understood to be allocated as Protected Open Land within the adopted Development Plan	
Current Land Use	Vacant greenfield site	
Brownfield/Greenfield?	Greenfield Protected Open Space	
Surrounding Details		

Land Uses	The allocation is bounded to the east by the A627(M), by junction 20 of the M62 to the south, Cripple Gate Lane to the north and built development to the west.
Character of Surrounding Area	Outside of the highway network the area is rural in character.
Constraints	
Policy Constraints	The site is noted to be a Protected Open Space and Green Belt.
Ground Conditions	<p>The allocation is adjacent to a motorway and a major highway, both of which could impact on the ground quality and offer opportunities for contamination of both ground and water. The site is next to a Site of Biological Importance and is within a Class 1 Radon area.</p> <p>The need to ensure that the allocated site and proposed development are safe from contamination from sources on site and on adjacent land are essential, and further evidence needs to be provided on these points.</p> <p>The site topography will result in any development on the site being visually prominent.</p>
Flood Risk and Drainage	<p>It is understood that the site is in Flood Zone 1 and as such limited detail is proposed to be provided at this stage in relation to the matter of flood risk. However, given the fact that there are existing water features on site including springs and surface water channels, and there is likely to be a significant increase in the level of surface water run-off from any development, we do not agree that this issue should not be addressed at this stage. Without clarity on the impact of surface water run-off on adjacent areas, and an understanding of the scale and nature of any works required as mitigation, it is not possible to demonstrate that the site is deliverable.</p> <p>The lack of clarity on the disposal of foul drainage is also of concern in relation to the deliverability of the site, particularly given the scale of the site and the associated costs which would have an impact on overall viability.</p>
Transport	As per other proposed allocations it is noted that this development is not deemed to have a severe impact on either the strategic or local networks, but notwithstanding this position statement, it has been acknowledged that mitigation would be required. Additionally, given the scale of development being proposed, this statement is refuted in circumstances where the highway network leading onto the M62 junctions are often congested at peak times and vehicles are often queuing on the motorway. This existing pressure will only be exacerbated by the scale development now being proposed and will result in detrimental highway impacts.

	<p>The proposed mitigation and highway and junction improvements are noted to be extensive. When added to other works being proposed on adjacent allocations, cumulatively the works would significantly impact on traffic flows throughout Rochdale and this has not been taken into consideration. In reality, the overall scale of growth within the area will create queuing traffic, air pollution, noise and highway safety concerns which the GMCA have thus far failed to sufficiently address or overcome.</p> <p>Whilst the site is understood to have access to local bus services no clarity is provided as to whether the existing provision is sufficient to service the needs of existing as well as future demand. In addition, the site is not sufficiently well placed for access on foot to key services and facilities.</p>
<p>Utilities</p>	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site.</p> <p>It is noted that there is a high-pressure gas pipeline crossing the western part of the site which will no doubt require a development buffer/easement. It is noted that this will be achieved by way of a linear park, however confirmation is sought as to whether such a use is appropriate and whether the Health and Safety Executive have been consulted – any easement would have a potentially significant impact on developable area, viability etc.</p>
<p>Environment</p>	<p>The site will result in the loss of Protected Open Land and the loss of an important visual break in development in the local area. The resultant harm on recreational and visual amenity as a result of this will be significant.</p> <p>It is noted that the policy for this allocation also states that the development of this site will be required to provide a positive visual impact given its prominent position adjacent to the M62 and A627(M). As set out in relation to the matter of ground conditions this site is visually prominent and could well result in detrimental visual impacts from a number of localised and wider vantage points. There is insufficient evidence currently available to address this concern.</p> <p>Whilst it is noted that the initial ecological appraisal advises that ecological constraints are limited, it is noted to recommend additional surveys, particularly if woodland, wet grassland and ponds are to be retained within the development. The impact on habitats and transitory routes needs to be more carefully considered in relation to the impact on development layout, siting and mitigation prior to allocation of the site.</p> <p>Given the proximity of this allocation to the both the M62 and A627(M) residents have serious concerns regarding the long term impacts of noise and air pollution on the proposed</p>

	<p>residents of the new dwellings, in addition to the concerns regarding the impact on health, air pollution and noise within the local area created by the scale of development on this site. Health impacts are valid material considerations which need to be addressed. The fact that the M62 and A627 are in a designated Air Quality Management Area only serves to heighten this issue.</p> <p>In relation to the impact of noise from the highway it is noted at paragraph 22.1 of the Topic Paper that the range of noise impact within the allocation varied from low risk to high risk dependent on the proximity to the motorway and A627. In reality, any acoustic mitigation is unlikely to lessen this impact, particularly in garden areas, and simply should not be found to be an acceptable approach to the delivery of new homes.</p>
Historic Environment	<p>There are no known designated heritage assets within the allocation boundary; albeit it is noted that additional work is required in relation to the potential for archaeological finds. It would be preferable to require the preparation of this evidence prior to allocation in order to allow time to review and confirm the total potential developable areas in addition to having a better understanding of other potential barriers to development such as the pipeline easement referred to above.</p>
Social	<p>The need to address the acknowledged existing shortfall in school places remains as per other allocations, with planning gain from the development of this site anticipated to support the delivery of additional school places. However, it is not possible to know whether the scheme would be viable and therefore be able to provide for the existing shortfall irrespective of the additional demand for spaces that the development itself would generate.</p> <p>The impact of a development of this scale on care and health provision in the local area, and then considered cumulatively with reference to the other larger strategic allocations proposed in the local area, raise significant concerns as to whether services will simply be unable to cope and whether the development of the scale proposed could fund the extra demands or whether there would, in turn, be pressure for more development.</p>
Requirements to overcome constraints	Please see comments above
Planning History	<p>It is understood that for a screening opinion in respect of proposed residential development at the site was submitted in December 2018. The decision in February 2019 (19/000006/SO) was that an Environmental Impact assessment (EIA) was not required.</p>

<p>Deliverability</p>	<p>It is noted that the assessment of viability concludes a negative residual value of circa -£20.1m which worsens to -£22m once strategic transport costs are included.</p> <p>Whilst the report goes on to indicate that with a reduction in affordable housing provision and an increase in market values the scheme becomes marginal.</p> <p>There are several concerns with this approach(1) the reliance on an increase in housing market values which cannot be guaranteed, (2) the reduction in affordable housing provision which will ensure the development fails to meet the housing needs of the local area and does not assist in addressing an already challenging supply issue, and (3) the lack of apparent consideration for other mitigation issues to be addressed within the development including on noise, air pollution, ecology, surface water flooding etc. In reality the report indicates that this site is simply not deliverable.</p>
<p>Anticipated timeframe for availability</p>	<p>No timeframe for delivery specified although the transport assessment is noted to have been based on the period 2025-2040.</p>
<p>Commentary</p>	
<p>This allocation will result in the loss of an extensive area of Protected Open Land, and the loss of an important green gap within this part of Rochdale.</p> <p>The traffic impacts of the development, particularly given the proximity of the M62 and A627 will be significant and have not been addressed in relation to the proposed mitigation. Given the scale of development being proposed alongside others in the local area there will be congestion, queuing traffic, increased air pollution, and impacts on highway safety which the evidence base has thus far failed to suitably address or overcome.</p> <p>The site is visually prominent from a larger number of vantage points and the harm resultant from a development so this scale on the character and visual amenity of the local area will be significant.</p> <p>The site has the potential to offer habitat for protected and priority species, however there has been insufficient investigation or consideration of impact in that regard.</p> <p>In reality this allocation is lacking in relation to the supporting evidence base to justify its delivery. Furthermore, there are legitimate concerns in relation to the viability and hence the deliverability of the site. For these reasons the allocation is not robustly justified.</p>	

Appendix 8 Site Assessments of Proposed Allocations within Tameside

Site Assessment South of Hyde

Site Plan

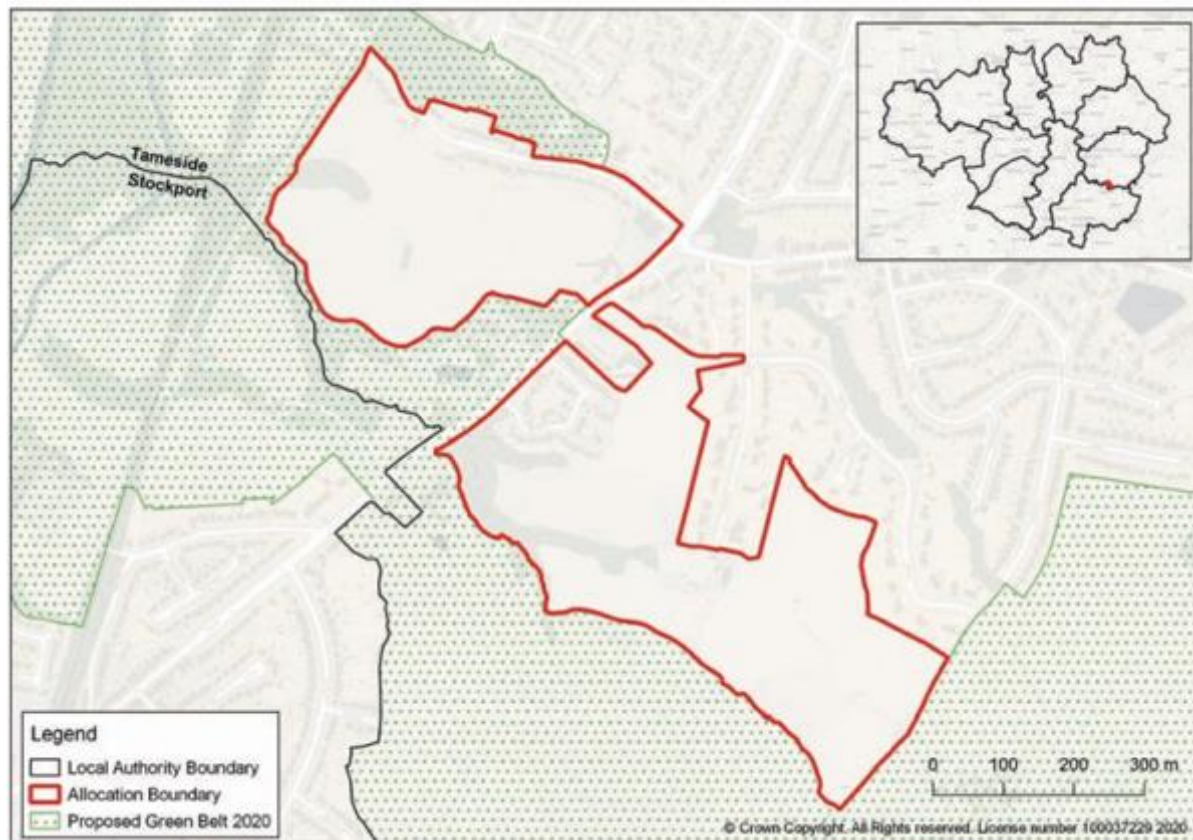


Image Source: Place for Everyone Publication Plan 2021

Site Details			
GMSF Reference	JP Allocation 32		
Landowner	Part Council owned, part privately owned by Bagshaw family, and part owned by Gladman		
Site Address	Bowacre Road, West Park Road, Apethorn Lane, Hyde, Tameside		
Postcode	SK14 5DL	Site Area (HA)	33ha of Green Belt with 29.98ha considered greenfield, 19.5 hectares considered to be developable.
Description of Site	The site is understood to be currently designated as Green Belt within the adopted Unitary Development Plan with a small area (1.8ha) of white land also included within the allocation adjacent to Hilda Road in order to secure access.		

	<p>In respect of the NPPF considerations, the following are relevant:</p> <p>1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness? Rating: strong</p> <p>1b - Does the parcel protect open land from the potential for urban sprawl to occur? Rating: strong</p> <p>2a - Does the parcel prevent the merging or erosion of the visual or physical gap between Neighbouring settlements? Rating: Strong</p> <p>3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Rating: Strong</p> <p>4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)? Rating: Weak</p> <p>The Topic Paper associated with the allocation also confirms that much of the site is designated within the Greater Manchester Joint Minerals Plan as being within the mineral safeguarding areas for brick clay and coal.</p> <p>The Pole Bank Site of Biological Importance (SBI) runs through the site and an SBI on Apethorn, in addition to two areas of Ancient Woodland and protected trees along the boundaries.</p> <p>The site is noted to be described as being primarily vacant greenfield in use for grazing with a number of built structures and development within the site edge including residential properties on Apethorn Lane, a recent Countryside Properties residential development at Broadmeadow Drive and assisted living accommodation at Pole bank Hall. A motor sales garage and a number of farm complexes including the Grade II* listed Apethorn Farmhouse.</p> <p>The list of structures referred to above however does not give a true reflection of vacant, greenfield and rural character of this proposed allocation.</p>
Current Land Use	Predominantly vacant greenfield but with some scattered areas of development as referred to above.
Brownfield/Greenfield?	Greenfield, other than the structures referred to above.
Surrounding Details	

Land Uses	<p>The site is bounded by a public footpath and railway line to the north, the A560 Stockport Road cuts through the centre of both sites, with residential development along the eastern boundary and the smaller settlement of Woodley to the west. The southern allocation is bounded by Lord Derby Road to the south and beyond that is open countryside. The site is also bounded by two areas of ancient woodland.</p>
Character of Surrounding Area	<p>The Site is classified as Greater Manchester Landscape Character Area and, although it is accepted that the character of land to the east and west of the proposed allocation is urban in nature, to the south the area is very rural in character. The area includes a wildlife corridor and a large area of open countryside which lies between the allocations' northern boundary and the settlement of Haughton Green. This area includes the Haughton Dale Nature Reserve. To the south east is the Werneth Low Country Park, beyond which is the Peak District.</p>
Constraints	
Policy Constraints	<p>Green Belt and Mineral Safeguarding Area with a limited portion of white land.</p>
Ground Conditions	<p>The Topic Paper associated with the proposed allocation indicates at paragraph 12.1 that the site is recorded as being of a mix of grade 3 and grade 4 agricultural land. It is understood that the majority of the site is grade 3b meaning it is not included within the best and most versatile. Confirmation is sought in relation what level of independent assessment has been undertaken on this report and whether DERFA agree with the report conclusions as a large area of both sites is classified as urban notwithstanding that the Apethorn and Bowlacre sites have not been building on within the allocation areas (it is recommended that GM Mapping is reviewed in this regard).</p> <p>The site is within a coal development low risk area and parts of the site are identified as mineral safeguarding areas for brick clay and coal. Given the national and international shortages in building supplies clarification is sought that there is no need to retain access in the longer term to these mineral assets. It would appear that developing over such assets could well be inappropriate and unsound.</p> <p>Two small areas of landfill are adjacent to but outside of the allocation boundary, albeit leaching from this historic use and impact on safety of ground water etc within the allocation still need to be carefully addressed.</p> <p>There are also noted to be ground fuel storage tanks at a number of adjacent uses on Stockport road and the potential for remediation and contamination from such developments also needs to be assessed and addressed prior to allocating the site for development. Leaving such questions and the need for primarily</p>

	<p>assessments simply to be addressed within any future application on site, is deemed wholly unacceptable.</p>
<p>Flood Risk and Drainage</p>	<p>Section 11 of the Topic Paper addresses the matter of flood risk and confirms that within the Level 1 SFRA that other land parcels were identified as being more vulnerable. In fact at paragraph 11.4 the Topic Paper advises that 9% of the site could be subject to a flood depth of an average of 40mm and as such development should be focused on the areas within flood zone 1 with other management and controls required. With the site only being developable with mitigation measures. Given the need to focus development in areas at lower risk from flooding we do not accept that sufficient safeguards have been provided at this stage to justify allocating the site for development within the Plan. It is recommended that an updated assessment is undertaken as the existing flood risk data is considered outdated and not representative of the true baseline.</p> <p>Local residents have made a video of the flooding experienced within the area which can be viewed here:</p> <p>https://www.youtube.com/watch?v=vMIWwmxL_Pc&t=485s</p> <p>The extent of built development being proposed also raises concern in relation to the potential for future surface water flooding in the local area and any associated impact on the neighbouring areas and safe access and egress within the development. The justification to release this site for development is simply not justified to (1) secure the release of this Green Belt site and (2) to justify developing a vulnerable use in an area at risk from flooding without clarity on safeguards and mitigation. New properties already building in the surrounding area, in particular along Broadmeadow Drive, have experienced flooding notwithstanding purported mitigation measures having been implemented.</p> <p>The risk to the safety of ground water from disturbing former landfill and potential contamination on neighbouring sites is also clearly of concern.</p>
<p>Transport</p>	<p>It is understood that access to the site could be secured from the A560 Stockport Road. This will significantly increase traffic in and around an already busy A560 and could lead to increased congestion, and impact on the highway network and highway safety given the gross scale of development being proposed. When factoring the scale and nature of other proposed allocations in the local area the cumulative impact on the highway network will be significant. No allocation for new development should be made without at least a baseline assessment of capacity/additional users having been undertaken.</p> <p>The fact that paragraph 10.11 of the Topic Paper confirms that a number of motorway junctions in the local area were identified as nearing or exceeding operational capacity which has been accepted to worsen as a result of this allocation, the impacts on the</p>

	<p>highway network cannot be understated and do not currently justify the proposed allocation. The proposed transport mitigation options are not deemed to be sufficient to address the concerns of residents in relation to this proposed allocation either in isolation or in relation to the cumulative impacts from other proposed allocations in this local area.</p> <p>The following quote from the background papers is extremely telling in respect of the significance of the existing problems, to exacerbate these would be irresponsible and a risk to highway safety:</p> <p><i>‘The morning and afternoon peak traffic periods on the A560 extend for about two hours. The morning peak commencing at around 6.30am and finishing at 8.30am. Through the morning and in the afternoon until the PM builds up, the traffic is more free flowing but there are extended periods when the traffic flow is heavy and slow. During the morning peak traffic period, the west bound traffic on the A560 is continuous and unrelenting. Traffic moves very slowly at about 2mph in a continuous nose to tail queue’.</i></p> <p>The Topic Paper indicates that the site is well located for access to sustainable modes of travel. However, it is noted at paragraph 10.7 that further improvements in bus services along the A560 would be of benefit. Given the scale of development being proposed it is important that issues such as access to services, facilities and public transport are at the forefront of the decision making process, and as it stands there are too many unknowns in relation to public transport provision and general improvements to justify this allocation. Access to services etc on foot is a particular concern. Woodley can only accommodate approximately 6 cars on the station car park, with parked vehicles often causing congestion on surrounding roads. The trainline itself is not electrified and as such can only accommodate diesel trains – it is unlikely that the proposals would provide sufficient planning gain to enable an upgrade to this facility.</p>
<p>Utilities</p>	<p>The localised issues with water distribution and sewerage raises significant concern in relation to the potential for environmental impacts on ground water and surface water flooding and the capacity of existing infrastructure to accommodate development of this scale. Existing waste water is pumped uphill and there is insufficient infrastructure to accommodate a further 440 homes.</p>
<p>Environmental</p>	<p>Paragraph 14.1 of the Topic Paper confirms that this allocation will lead to the loss of 32.35 hectares of Green Belt land. It is noted that the Stage 1 Green Belt Assessment evaluated that the site plays a strong role in checking the unrestricted sprawl between Gee Cross, Greave and Woodley, plays a strong role in preventing the neighbouring settlements of Hyde, Woodley and Romiley from merging into one another, play a strong role in safeguarding the countryside from encroachment and plays a weak role in preserving the setting and special character of historic</p>

towns. The important role therefore that these sites play in relation to the purposes of the Green belt simply cannot be understated. Paragraph 14.4 states that the parcel contributes strongly to the sense of openness and plays a strong role in checking the unrestricted sprawl of Gee Cross, Greave and Woodley and in inhibiting ribbon development along internal and bordering roads.

The parcel is understood to play a critical role in preventing the physical coalescence and perception of merging of Hyde and Woodley – these settlements are only 400m apart and it is imperative to be able to maintain this separation if the area is not to become completely urbanised.

The stage 2 assessment confirmed that the overall harm from the release of this site from the Green Belt would be moderate-high constituting significant sprawl and encroachment into the countryside. The case for special circumstances simply does not override or outweigh the harm resultant from this proposed allocation, and the national policy presumption against its release. The need for mitigation to secure a more defensible boundary only heightens the fact that this is not the right site to be being brought forward for development.

It is noted that the allocation is within the Urban Fringe Valleys landscape character type, transitioning into the Pennine Foothills (dark Peak) landscape character type to the east. and that the careful siting of development and tree planting will be required to ensure that the land and visual impact of the new development is appropriately considered and minimised. The fact that the site is visible from a significant number of vantage points also needs to be duly considered and as it stands there is insufficient demonstration that landscape character and visual amenity can be protected.

The site is greenfield and on the boundary of ancient woodland. The topic paper indicates that there are no known ecological constraints which are so important as to preclude the allocation of the site, although mitigation or compensation will be required. However, the site includes a Site of Biological Importance, is adjacent to a nature reserve and ancient woodland, and a number of protected species and potential specially-protected priority species have been identified. Therefore, the conclusion that there are no ecological impacts sufficient to negate the allocation of the site on the basis of the evidence as put forward is simply incoherent and will not pass the tests of soundness.

Given the proximity of the railway and the A560 there are also concerns in relation to the impact from air pollution and noise in relation to the proposed end users of the new development, and on the increase in noise and air pollution in the local area from the scale of development now being proposed. The impact of development on health of existing and future residents is a significant issue that needs to be carefully considered prior to allocating this site for development, especially in light of the Council acknowledging the state of climate emergency.

<p>Historic Environment</p>	<p>It is understood that the archaeological resource of the site is largely unknown but there is potential for remains of high local/regional importance.</p> <p>It is noted that within the allocation is an at risk grade II* listed building, namely the Apethorn Farm complex. Whilst our clients would be supportive of the reuse of this building and the case for enabling development, to secure an allocation of this scale simply to secure the future of this heritage asset would appear unreasonable and disproportionate. This is heightened by the fact that consent was granted again in 2017 for the renovation and conversion of the farmhouse etc, the third time permission had been granted, and without the requirement for the significant scale of development proposed pursuant to this allocation within the wider local area. Additionally, the setting of a heritage asset of such significance would surely be detrimentally affected by the scale of development anticipated within the allocation.</p> <p>It is noted that there are a number of other designated heritage assets in the local area and a number of non-designated heritage assets within the allocation boundary, and there are concerns that the harm on the historic environment has not been sufficiently evaluated at this stage in the Plan process to robustly justify a sound evidence base and allocation of the site.</p>
<p>Social</p>	<p>The Topic Paper sets out the existing issues with job opportunities skills, training, productivity and poor health outcomes in the local area. These issues could well be addressed through investment and development in the local area and by investing and generating areas and existing previously developed sites, without being used as case to justify removal of a site from the Green Belt.</p> <p>Our clients also do not accept that the development will not lead to future pressures on existing services within the local area. A development of this scale would not be able to secure sufficient planning gain to facilitate the required improvements to local services and facilities needed by the existing local population and would certainly not be sufficient to then facilitate the pressure on those services and facilities that the extra population would bring. There is already a need for more school places, better highway and rail infrastructure, GP and hospital facilities, and social care. Additional homes will only add to this existing under provision. When issues such as the potential for enhancement to heritage assets, ecological areas, and ground conditions are factored in, it is impossible to see how there could be any viable return for a developer without putting pressure on further Green Belt release.</p>
<p>Requirements to overcome constraints</p>	<p>Pressure on existing environment and infrastructure may require the site developer to make contributions to public services, albeit the scale and nature of such contributions will be determined at a later date and the local community will have no say on what they would entail or the scale of contribution being proposed to support their community. It is likely that the scale of contributions required</p>

	<p>by the development would put pressure on the Local Authority to grant permission for more development than currently anticipate or fail in providing for the service and facilities that are already required, thereby exacerbating the existing problems.</p>
Planning History	<p>Appendix 7 of the Topic Paper is noted to detail the planning history associated with the site including applications for the car showroom and previous applications for residential development and renovation of the farmhouse. However none are deemed to be of sufficient scale to be used in support of the release of this large Green Belt parcel.</p>
Deliverability	<p>Paragraph 25.1 of the Topic Paper confirms the site to be viable taking account of transport mitigation measures and requirements of the policy, including green infrastructure. However, at this stage without clarification on the site area to be given the potential impact of historic landfill and other environmental site constraints including the potential loss of protected species and habitat, and the areas safeguarded for mineral extraction there are concerns that such a conclusion has been incorrectly confirmed.</p> <p>As set out above, the reality is that development of the scale proposed would not be viable when factoring in all the anticipated remediation and planning gain, the result of which would likely be pressure for additional Green Belt release or development which exacerbates existing service and facility problems.</p>
Anticipated timeframe for availability	<p>Development projected to be delivered between 2026 and 2033.</p>
<p>Commentary</p>	
<p>The site subject of this proposed allocation is noted to result in significant harm to the Green Belt.</p> <p>There are concerns in relation to the impact of increased traffic in the local area in relation to congestion, highway safety, air quality, pollution, noise etc.</p> <p>The site has historic land uses on adjacent sites which could undermine the safety of any associated future built development in relation to contamination and remediation and is an issue which has thus far not been sufficiently addressed.</p> <p>The allocation has been shown within the GMCA's own evidence to result in detrimental impacts on ecological networks and there remain concerns in relation to the robustness of the conclusions on viability given the numerous technical and safety issues associated with the development of the site which could impact on the delivery of the site.</p> <p>Residents remain concerned that this allocation represents a gross scale of development wholly unacceptable to be accommodated within the local area, and will result in significant detrimental impact on the local environment including on ecological networks and the potential for surface water flooding given drainage issues in the local area and the extent of built development being proposed.</p>	

The impact on the historic environment is also of concern and the renovation of listed structures simply does not justify such a significant release of Green Belt where there has been shown to be resultant harm.

It is our view that as it stands the GMCA have failed to robustly justify the allocation of this site, with serious questions outstanding that need to be addressed before the Plan and this allocation in particular can be found to be sound.

To date there have been no amendments to the proposed Green Belt release in this location notwithstanding significant objection. Schools are at capacity, highway infrastructure is barely able to cope with existing demands, and the anticipated impacts on the environment are unacceptable. There is a real and demonstrable likelihood that any development allowed on the land proposed to be released from Green Belt in this location would only lead to further pressure down the line for additional development and in releasing an area so substantially larger than required there would likely be no way for anyone to prevent it. NPPF requires that Green Belt boundaries only be altered where exceptional circumstances are evidenced and fully justified – this has not been done to date and the reasonable alternatives have not been given due consideration.

Additionally, the Secretary of State had stated that 'the housing figure is not a target. Local authorities should make a realistic assessment of the number of homes their communities need using the standard method as a starting point'. It has not been demonstrated that this has been done and therefore the figures proposed cannot be justified.

Appendix 9 Site Assessments of Proposed Allocations within Bury

Site Assessment Elton Reservoir

Site Plan

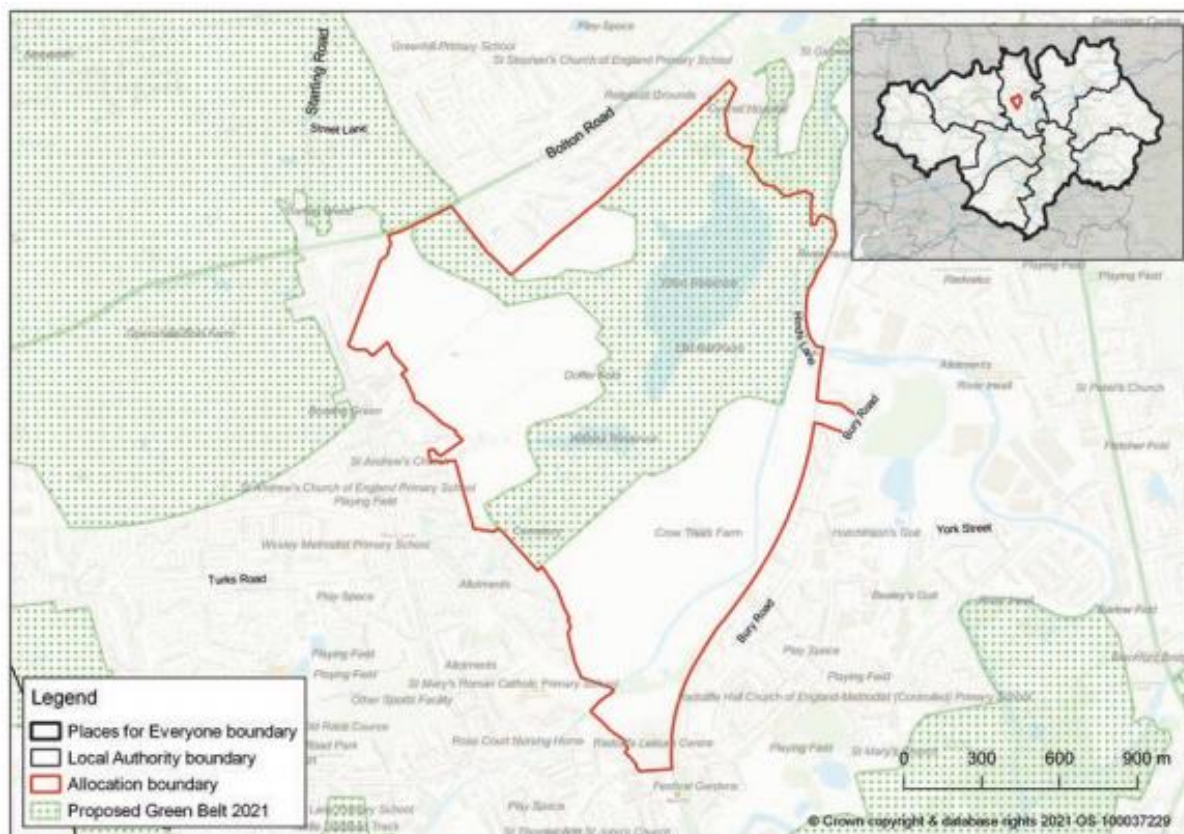
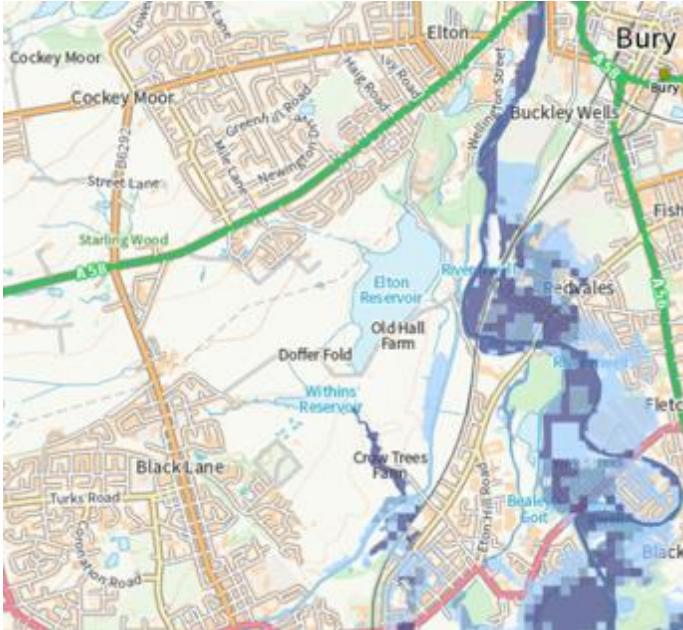


Image Source: PfE Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 7		
Site Address	-		
Postcode	-	Site Area (HA)	251.6ha
Description of Site	Agricultural with hydrological infrastructure (2 x reservoirs and dams etc)		
Current Land Use	-		
Brownfield/Greenfield	Greenfield		
Surrounding Details			
Land Uses	Residential and commercial to the north, east and south, agricultural to the west.		
Character of Surrounding Area	Urban areas of Bury to the north and east and Radcliffe to the south, open agricultural to the west.		

	<p>The Manchester, Bolton & Bury canal borders the site to the east alongside the Metrolink line.</p>
<p>Constraints</p>	
<p>Policy Constraints</p>	<p>Other Protected Open Land & Green Belt allocations – the allocation ostensibly reduces the area of Green Belt, indicating that 124.9 ha of the 251.9 ha site will remain within the green belt (shown on the plan above).</p>
<p>Ground Conditions</p>	<p>Previous uses include farm yards, former railways, areas of infilling, collieries, allotments, marshlands and reservoirs. Also, partially within a Radon Class 2 Area.</p> <p>The geological mapping indicates the allocation is underlain by glacial till and glaciofluvial deposits underlain by the Penning Middle Coal Measures and Pennine Lower Coal Measures Secondary Aquifers, with at least 6 faults across the allocation. Japanese knot weed is present across the site.</p> <p>All the above would need to be taken into consideration along with a phase 2 contamination assessment for any site being brought forward for development.</p>
<p>Flood Risk & Drainage</p>	 <p>Areas fall within in flood zones 1, 2 & 3 (see above extract from EA mapping).</p> <p>There are implications for building close to the existing reservoirs and dams, with mitigation and structural works required to minimise potential risk to life.</p> <p>Detailed drainage strategy would be required including identifying the effects of introducing impermeable surfaces – as the effects of development on existing flood zones is not known it is not possible to define areas appropriate for development.</p>

	<p>There is unlikely to be capacity for surface water in the existing water courses and mitigation will be required.</p>
Transport	<p>Existing issues of road congestion and constraints - the allocation anticipates that development can alleviate the existing pressures through new infrastructure and contributions to enhancements of/access to the metrolink with a park & ride facility.</p>
Utilities	<p>There is a large pressurised water main and sewers which cut through the allocation, along with various easements.</p> <p>The majority of the allocation is not currently served directly by utilities and the infrastructure would need to be connected to adjoining facilities if/where capacity allows.</p>
Environmental	<p>The land within the allocation makes a moderate to significant contribution to preventing the sprawl of Greater Manchester and a significant contribution to maintaining the separation of Bury and Radcliffe. Although an area of Green Belt would be retained as part of the allocation, the assessment concludes that the contribution of this retained Green Belt would be diminished as a result of some weakening of the Green Belt boundary, increasing urbanising containment and a reduction in connectivity with the wider Green Belt.</p> <p>As Green Belt, any development within the proposed allocation area will have an impact on the existing site environment. The mitigation proposed by way of the creation of Elton Parkland on the remaining Green Belt land is not of substantial weight to justify the harm caused by the extent of proposed Green Belt release and the associated scale of proposed development.</p> <p>Within the allocation there are 6 SBIs, with SSSIs and a SAC in proximity to the allocation – all of which would be impacted on by the scale of development proposed, five within areas identified for prospective development, and for which substantial mitigation would almost certainly be required. Such impact is not only direct, through physical development, but indirect, as a result of recreational activity.</p>
Historic Environment	<p>There is a single Grade II listed building within the Site and another three in close enough proximity to require any development to consider impacts on setting and context.</p> <p>The Roman Road runs through the allocation and 17 sites of archaeological interest have been identified.</p>
Social	<p>Any development within the proposed allocation site would need to facilitate additional social infrastructure (education, healthcare etc).</p>

Requirements to overcome constraints	<p>Flood mitigation and structural works to minimise risk to life from the reservoirs/dams being breached and flooding.</p> <p>Detailed drainage strategy.</p> <p>Phase 2 contamination assessment and mitigation.</p> <p>Ecological mitigation and Appropriate Assessments (relating to Habitat regs) will be required.</p> <p>Impacts on heritage assets, including listed buildings, non-designated heritage assets, and archaeologically important areas will need to be given due consideration.</p>
Planning History	No relevant history for the Site
Deliverability	<p>Not known although the initial viability assessment indicated that development would be viable albeit forward funding may be necessary due to the requirement for infrastructure to be in place at an early stage in the process.</p> <p>Blanket values of £250,000 per ha were applied across the whole of Greater Manchester.</p> <p>The viability assessment included for a full 25% affordable housing contribution along with strategic transport and infrastructure costs which would be high.</p> <p>The Site is predominantly in the private freehold ownership of Peel L&P who have an in-house house building arm and as such there is a realistic chance of deliverability.</p>
Anticipated timeframe for availability	Phased gradually from 2025-2037
Other relevant information	
<p>Aspiration is to deliver an urban extension comprising approximately 3,500 new homes within a parkland setting, alongside recreational facilities, provision of new facilities for primary and secondary education, small local centres, community amenities and strategic transport infrastructure which includes a new link road, a new Metrolink stop with associated park and ride facilities.</p> <p>Development of the Site would remove the green buffer between the settlements of Radcliff to the south and Bury to the north and east.</p> <p>The justification for this area of green belt release would appear to be weighted heavily on how it could contribute to improving <u>existing</u> infrastructure capacity issues – driving the need for a new trunk road through the allocation and creation of a metrolink stop and associated park and ride – it's questionable whether the residential element is required as much to facilitate raising the funds necessary for this infrastructure as to meet housing need.</p> <p>Although the proposals would appear viable, by including an area of Green Belt substantially larger than the area anticipated for development, there remains the real</p>	

potential for future pressure to develop the wider site, foregoing any of the purported mitigation.

The presence of protected species and use of the allocated area by migratory birds has been identified and yet this has not been given due consideration in terms of defining 'developable' areas within the wider green belt release – no land should be specifically set aside as being appropriate for potential development when there is existing knowledge of protected species and habitats, especially where the defined impact of such works has not been assessed.

There are no exceptional or mitigating circumstances that would justify circumventing appropriate assessments of impact in advance of making any site allocations or releasing land from the green belt.

Site Assessment Walshaw

Site Plan

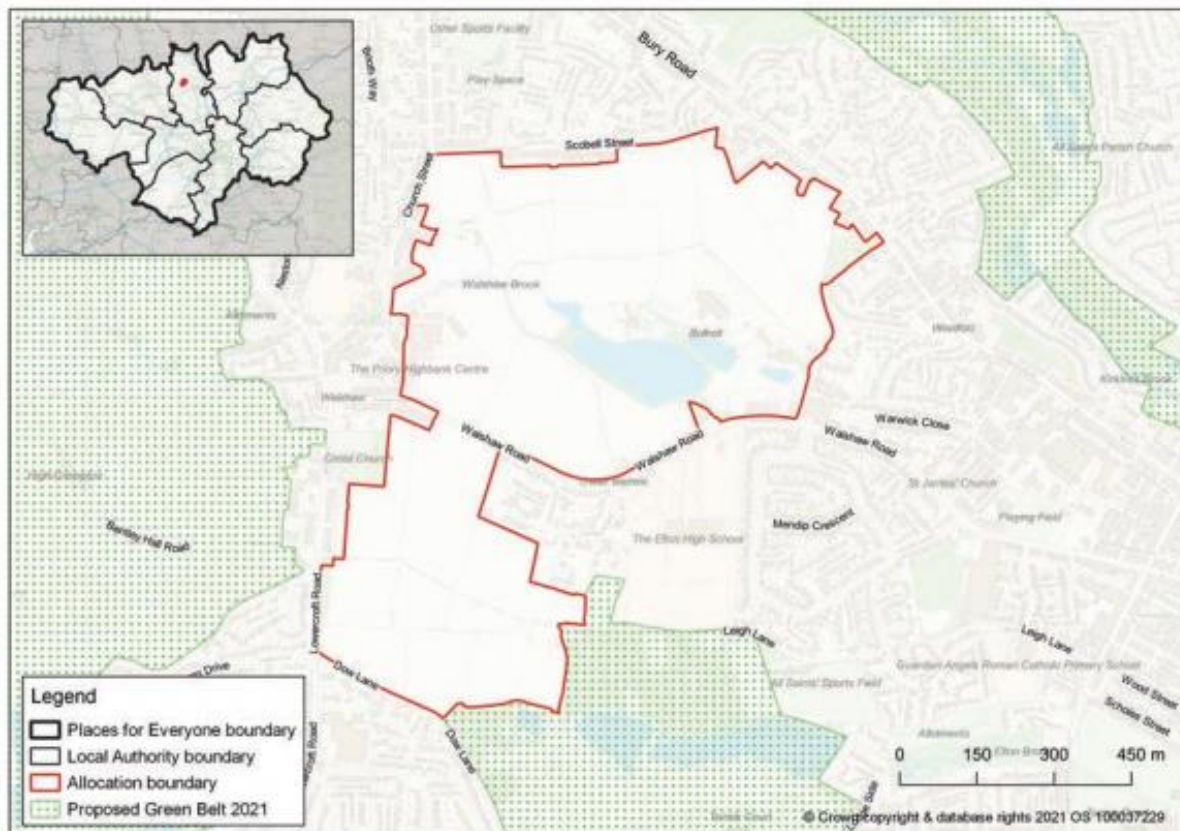
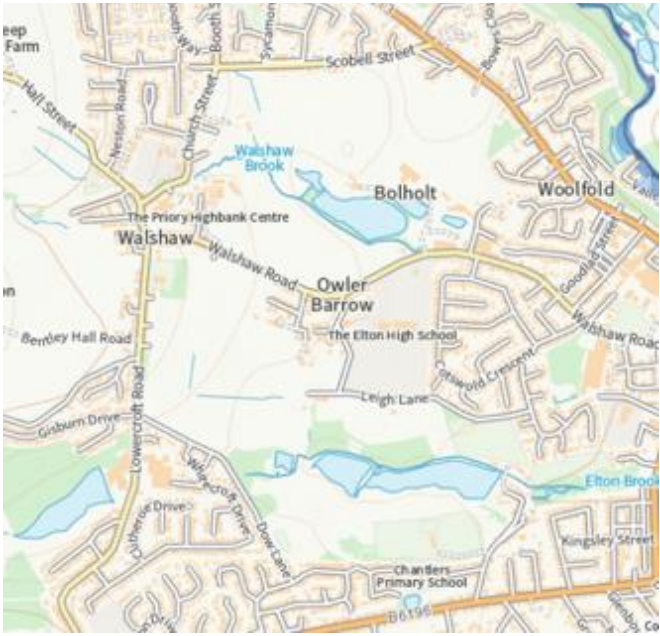


Image Source: PfE – Consultation Report 2021

Site Details			
PfE Reference	JP Allocation 9		
Site Address	-		
Postcode	-	Site Area (HA)	64 ha
Description of Site	Mainly agricultural with three reservoirs fed by Walshaw Brook		
Current Land Use	As above with the Bolholt Hotel and Stables Country Club and Lake Hill private residence located to the north of the reservoirs but excluded from the proposed area for development		
Brownfield/Greenfield	Greenfield with hydrological infrastructure		
Surrounding Details			
Land Uses	Residential around most of the Site other than a small area to the south east which is bounded by open countryside/ agricultural land.		

<p>Character of Surrounding Area</p>	<p>Bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east, Lowercroft to the south and Walshaw to the west.</p>
<p>Constraints</p>	
<p>Policy Constraints</p>	<p>Green Belt and Wildlife Links and Corridors designations</p>
<p>Ground Conditions</p>	<p>Previous uses of the allocation include agricultural fields, farmland, sewage works, bleach and print works, outbuildings and reservoirs and located in an area of historic quarrying/mining activity and also within an identified coal mining area.</p> <p>There is potential for ground gas and groundwater which will require monitoring, and due to the presence of coal seams and 2 historical mine shafts on parts of the allocation additional assessment/monitoring needs to be undertaken.</p>
<p>Flood Risk & Drainage</p>	 <p>Predominantly flood zone 1 with areas of surface water (extract from EA mapping).</p>
<p>Transport</p>	<p>Limited transport routes through the allocation.</p> <p>Development proposals would need to facilitate a north-south link along with peripheral connections.</p>
<p>Utilities</p>	<p>The majority of the allocation is not currently served directly by utilities and the infrastructure would need to be connected to adjoining facilities if/where capacity allows.</p>
<p>Environmental</p>	<p>The land within the allocation makes a moderate to significant contribution to preventing urban sprawl and safeguarding the countryside from encroachment.</p>

	<p>The allocation recommends works to the wider green infrastructure as mitigation/compensation for the loss of Green Belt.</p> <p>The allocation lies within the 'Manchester Pennine Fringe' Landscape Character Area and there are no identified benefits to the area brought about by the allocation.</p> <p>An SBI and Recreation Ground a within the southernmost section of the allocation located with a Wildlife Links and Corridors Unitary Development Plan (UDP) designation.</p>
Historic Environment	No on site heritage assets
Social	Any development within the proposed allocation site would need to facilitate additional social infrastructure (education, healthcare etc).
Requirements to overcome constraints	<p>Potentially FRA to address any localised areas of surface water flooding.</p> <p>Off-site green infrastructure enhancements.</p>
Planning History	None
Deliverability	<p>64 ha with a developable area of 28 ha.</p> <p>Not known although the initial viability assessment indicated that development would not be viable but with an uplift in anticipated sales values of 5% the proposals would potentially be viable. Blanket values of £250,000 per ha were applied across the whole of Greater Manchester.</p> <p>The viability assessment considered the anticipated scale of development could provide 25% affordable housing and that strategic transport and infrastructure costs would be high.</p>
Anticipated timeframe for availability	Gradually increased phasing from 2025-2030 and then reduced phasing to 2037.
Other relevant information	
<p>The allocation seeks to deliver 1,250 homes in the existing urban area alongside recreation facilities, a new primary school, a local centre and strategic transport infrastructure which includes a new link road.</p> <p>The allocation relies on wider off site enhancement to green infrastructure as mitigation for the loss and harm notwithstanding proposing a substantially larger area of Green Belt release than proposed for development. The release of a larger area of Green Belt than required for development would most likely result in additional pressure to develop the remainder of the allocation in future years.</p>	