

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	Stakeholder Submission
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentBamford.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentBamford.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	We 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. In fact the PfE aims to build 190.8k houses for a population increase of 158.2k people. More than one house per person.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance	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.

Places for Everyone Representation 2021

or soundness matters you have identified above.	
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JP-H 2 Affordability of New Housing
Agent Company / Organisation	Leith Planning Ltd
Type	Web
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Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	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.
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 2: Stakehill
Agent Company / Organisation	Leith Planning Ltd
Type	Web

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<p>Include files</p>	<p>PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_LeithRep.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Land Uses - 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 "two separate allocations north and south". 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. Character of Surrounding Area</p> <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 "sensitively" and there will be "an unacceptable impact on local roads" (NPPF para 85). The proposals would damage the identity of the existing settlements. Constraints 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:
 - ? 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

The NPPF para 120, Planning policies and decisions should: "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;" We submit that proposed development at JPA2-Stakehill does conform with the NPPF as quoted.

The SATP para 14.12 states "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".

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.

Ground Conditions - 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. 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.

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".

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". 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." These measures should be undertaken prior to deciding if the allocation is viable and this lack of process does not offer confidence.

Flood Risk and Drainage - 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 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.

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.

The L1 Strategic Flood Risk Assessment for Greater Manchester states that Rochdale is amongst the worst areas for high flood risk. The SATP para 11.4 states: "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". 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.

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.

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.

Data warns of more frequent flooding events UK extreme events - Heavy rainfall and floods - Met Office.

Transport - 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.

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.

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.

The Transport Localities 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 "further modelling work will be required to support the Transport Assessment for the allocation..." whilst Para 12.1.6, in relation to junction capacity, states "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". This is the case pre and post mitigation. 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

TLAA-CB-S (para 4.3) suggests "a new southerly link to Mills Hill station could form part of any expansion of the industrial estate". No modelling or associated investigations are presented for this.

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. 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.

The document also references "Proposed para 6.1.4 "Resurfacing of the unpaved sections of Boarshaw Lane and Thornham Lane is also proposed". No sections of either of these Lanes is currently paved.

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.

TLAA-CB-S Section 7 - Parking, notes that Rochdale & Oldham are yet to agree on parking standards for developments. 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. Table 5 - Allocation Traffic Generation only gives figures for passenger cars "Units are in PCU (passenger car

units/hr)". This excludes commercial vehicle movements. 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. The first sentence of TLAA-CB-S para 9.13 makes no sense □ it is just wrong. TLAA-CB-S para 10.1.3 makes irrelevant mention of JPA16-Cowlishaw. Its location would not be expected to have any effect on traffic in/around JPA2-Stakehill. TLAA-CB-S para 14.1.3 states "Junction modelling has however demonstrated that the Junction will operate within capacity at 2040." There is failure to explain how this conclusion has been reached. TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the "17A serves Stakehill in peaks". It is a single time service at approximate 05.30 Monday to Friday only.

Utilities - 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.

Environmental - 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.

The Stakehill Allocation Topic Paper, Section C-Environmental (14 Green Belt Assessment), confirms, throughout the Section, that "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."

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.

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.

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.

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.

Historic Environment - 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. 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.

Social -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. 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. This is in contradiction to Policy JP-P 6: "To help tackle health inequality new development will be required, as far as practicable, to:

A. Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;

B. Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice."

Requirements to overcome constraints - 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. 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. 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 GPs is the reason patients are facing long waiting times for appointments (rcgp.org.uk). Thus in the short/medium term "the provision of additional □ medical facilities" could remain an ambition rather than reality.

Planning

Deliverability - 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. 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. 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.

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	<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. Local Housing Need is being overridden by the proposal.</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> <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.</p>
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Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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).

Ground Conditions - The site is understood to slope upwards to the north with several undulations and gullies and currently comprises open fields with some limited buildings.

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.

The allocation is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed. 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.

Flood Risk and Drainage - 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. 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. Below is a photograph taken in February 2020 of surface water flooding into adjacent fields from Jowkin Lane following heavy rainfall.

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.

Transport - The allocation is not in a sustainable location and has poor accessibility by public transport. The site is not "internationally" accessible and not considered nationally accessible. 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. 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.

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 - 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. 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. 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.

Environmental - 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. 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. 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. 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. Secondly, there are no local benefits to building 450 homes on this site. Conversely, there will be significant harm caused by:

- 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

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. 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.

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

Historic Environment - 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.

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"

Social - 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.

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 horse 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.

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.

Requirements to overcome constraints - 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.

Deliverability - 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

viable. However, there are many obstacles to the deliverability of this site, including:

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.

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.

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.

Despite the developers brochure mentioning affordable homes in several places, the site Viability Assessment shows zero affordable homes.

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.

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.

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

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	<p>The potential impact on the existing spirting facilities within the allocation boundary remain of concern to the community.</p> <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 special circumstances for release. The allocation is therefore likely to be found to be unsound and should be removed from the PfE policies.</p>
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 20: Castleton Sidings
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentBamford.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>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. I 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.</p> <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, 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.</p> <p>Transport - 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</p>

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.

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.

Utilities - 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.

Environmental - 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.

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. 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.

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.

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.

Historic Environment - There are no known heritage assets on site, however there are

a number in the wider local area including views to and from St Martins Church, Castleton Conservation Area and the setting of lock 53, the towpath bridge and the United Reform Church. 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.

Social - 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. 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.

Requirements to overcome constraints - Investment in school and health provision, transport infrastructure etc are all required to support the delivery of this allocation.

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.

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.

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.

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.

There are legitimate concerns that the allocation is in fact unviable and therefore

undeliverable and therefore whether this allocation meets the tests of soundness.

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 21: Crimble Mill
Agent Company / Organisation	Leith Planning Ltd
Type	Web

Places for Everyone Representation 2021

<p>Include files</p>	<p>PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentBamford.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</p>	<p>Ground Conditions - 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> <p>Flood Risk and Drainage - As shown on the Environment Agency Flood Map, 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). 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> <p>Transport - 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.</p>

Pushing these issues to the application stage as opposed to addressing them prior to

allocating the site is simply unacceptable. 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.

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.

Utilities - 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.

Environmental - 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.

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.

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. 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.

Historic Environment - 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.

Impact on archaeology also needs further assessment.

Social - 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.

Requirements to overcome constraints -See above comments on school places, health, contamination and flooding.

Deliverability - 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 herniate asset. The allocation is not therefore deemed to be viable or deliverable. The reliance on unit types with higher

land values may not be meeting the identified housing needs of the local area which again could undermine the soundness of the Plan.

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. 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.

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.

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.

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 22: Land North of Smithy Bridge
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentBamford.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No

Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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.

Ground Conditions - 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.

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.

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 - 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.

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.

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.

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.

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. The nearest metrolink is 4km away and has no direct bus route. The rail network already struggles at peak times, with only one or two trains per hour depending on the time of day.

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.

Utilities - 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.

Environmental - 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. 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).

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.

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 significant. The justification to release the land is not deemed to be sufficient or robust enough to warrant allocation.

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.

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.

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.

Impacts on the amenity of proposed residents from the railway also needs further detailed consideration.

Historic Environment - 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. The potential impact on archaeological features is also noted to be a consideration.

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 Cleggswold Farm is welcomed, however the wider development irrespective of a buffer zone will still result in an excessively dominant and harmful development.

Social - As set out below the development will add pressures to the existing local education system and there remain substantial 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.

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.

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.

Deliverability - 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.

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.

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.

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.

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.

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.

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 23: Newhey Quarry
Agent Company / Organisation	Leith Planning Ltd
Type	Web

Places for Everyone Representation 2021

Include files	PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_LeithRep.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Ground Conditions - 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> <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.</p> <p>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. The proximity of the new access and increased traffic in relation to the primary school is of significant concern. Whilst the site is well located for access to the Metrolink and bus service (albeit very limited service) there are few available within Newhey itself to cater to the needs of a development of this scale.</p>

Utilities - 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.

Environmental 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.

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). 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.

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.

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. 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. 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.

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.

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. There are concerns on the safety and suitability of the proposed access and the general

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	<p>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>
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 24: Roch Valley
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentBamford.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>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.</p> <p>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.</p> <p>Flood Risk and Drainage - 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</p>

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.

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.

Transport - 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.

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 an area used by local children to use as a safe place to walk to school.

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.

Utilities - 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. 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.

Environment - 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.

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.

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.

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.

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 to the River Roch from run off does not appear to have been considered at any point.

Historic Environment - 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.

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.

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.

Social - 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.

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.

Requirements to overcome constraints - Please see comments above

Deliverability - 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.

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 whether the land values are sufficient to overcome the significant environmental issues with this site.

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.

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.

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.

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	<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>
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JPA 25: Trows Farm
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentBamford.pdf PFE1287367_LeithRep.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Ground Conditions - 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. 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> <p>Flood Risk and Drainage - 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 runoff 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>

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.

Transport - 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. 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.

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.

Utilities - 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.

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.

Environment - 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.

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.

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.

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 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.

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.

Historic Environment - 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.

Social - 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.

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.

Requirements to overcome constraints - Please see comments above

Deliverability - 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. 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.

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.

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.

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.

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.

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.

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.

Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	Supporting Evidence
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_LeithRep.pdf

Places for Everyone Representation 2021

	PFE1287367_SiteAssessmentBamford.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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. In Rochdale, the LHN is 8,048 and there is land available for 7,997 houses with no release of Green Belt. Rochdale Council are seeking approval for 7,000 houses on sustainable, brownfield sites around local stations. This, alongside planning permission already granted for 1,000 homes in South Heywood should supply nearly all the housing requirements for the next 16 years. However, Rochdale are seeking to release enough Green Belt / greenfield land to build an additional 4,000 houses. There is no justification for this release. 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.
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	JP-G 10 Green Belt
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentBamford.pdf PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
Person ID	1287367
Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287367_SiteAssessmentNewheyQuarry.pdf PFE1287367_SiteAssessmentStakehill.pdf PFE1287367_LeithRep.pdf PFE1287367_SiteAssessmentBamford.pdf
Soundness - Positively prepared?	Unsound

Places for Everyone Representation 2021

Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Company / Organisation	SaveGreaterManchestersGreenBelt(SGMGB)RochdaleGroups
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Places for Everyone Representation 2021

Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No