

Land south of Thornham Lane
and west of Stakehill Lane,
Slattocks

Greater Manchester Spatial
Framework

Representations to revised draft plan

indigo.

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west of Stakehill Lane, Slattocks**

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March 2019

Indigo

indigo.

St James' Tower
7 Charlotte Street
Manchester, M1 4DZ

T 0161 836 6910
E info@indigoplanning.com
W indigoplanning.com

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Greater Manchester Spatial Framework

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Appendices

Appendix 1

Site Plan (Ref: P11178-AEW-XX-XX-DR-A-0002 P2)

1. Executive summary

- 1.1. We write on behalf of the Trustees of J.P. Milne (dec'd) Will Trust (herein referred to as "the Milne Trust") to make representations to the Greater Manchester Spatial Framework (GMSF) Revised Draft 2019.
- 1.2. The Milne Trust is actively promoting land immediately to the south of Thornham Lane and west of Stakehill Lane, Slattocks, for mixed-use development. This substantial land holding land extends to approximately 5ha and forms part of draft Policy GM Allocation 2 (Stakehill). The extent of the site boundary is shown at **Appendix 1**.
- 1.3. Indigo has also submitted separate representations on behalf of the Milne Trust in relation to its land north and east of Stakehill Industrial Estate, Middleton, also within the draft Policy GM Allocation 2 area.
- 1.4. A significant amount of baseline survey and feasibility work has been carried out at the site which is now informing the design evolution of the scheme. The plan at **Appendix 1** shows access proposals and broad areas of development. This is alongside continued pre-application discussions and engagement with Rochdale Metropolitan Borough Council (herein referred to as "RMBC" or "the Council").
- 1.5. There is strong support for the proposed allocation of the site as part of draft Policy GM Allocation 2. There is, however, strong objection to the proposal to retain land south of Thornham Lane and west of Stakehill Lane as Green Belt.
- 1.6. These representations espouse the site's deliverability and demonstrates that retention of Green Belt in this location is entirely unnecessary and without justification. Furthermore, there are no site constraints preventing employment-led mixed-use development including residential and other complementary uses being delivered on the site in the short-term.
- 1.7. In accordance with Annex 2 of the NPPF, the site is available, suitable and achievable for development in the short-term:
 - **Available:** The site is wholly owned by the Milne Trust. As such, there are no ownership constraints preventing the site coming forward in the short-term either in isolation from or as an early phase of the wider Stakehill allocation.
 - **Suitable:** The site has excellent sustainability credentials and is strategically located for employment-led mixed-use development including residential and supporting uses. Development of the site is technically deliverable and there are no known constraints which cannot be mitigated through scheme design.
 - **Achievable:** The site can come forward in isolation from or as an early phase of the wider allocation to deliver much-needed development in the short-term.
- 1.8. Delivering a substantial mixed-use development at the site will result in significant economic, social and environmental benefits to the local area and community helping to boost the Slattocks area of Rochdale. The proposed allocation represents a crucial opportunity to widen the housing choice and enhance an established and strategically located employment site in a suitable and sustainable location. Development of the site will play a crucial role in delivering much-needed employment and housing delivery in Rochdale.
- 1.9. Therefore, it is vital that this site continues to be included as a future mixed-use allocation as the GMSF progresses given that it forms an essential part of Rochdale's future employment and housing strategy. Whilst the Milne Trust is supportive of draft Policy GM Allocation 2,

land south of Thornham Lane and west of Stakehill Lane must be released from the Green Belt to enable it to positively contribute to the delivery of the identified housing and employment floorspace in Rochdale in the short-term.

2. Response to questions in draft GMSF Chapter 1

Question 1: What type of respondent are you?

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

Question 2: Contact Details

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

Daniel Jackson

Indigo Planning

St James' Tower

7 Charlotte Street

Manchester

M1 4DZ

Email: daniel.jackson@indigoplanning.com

Tel: 0161 836 6910

Question 3: Are you over the age of 13?

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

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

- 2.4. The representations are submitted on behalf of The Trustees of J.P. Milne (dec'd) Will Trust. The contact details for these organisations is c/o of the agent, Indigo Planning.

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

- 2.5. Yes.

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

- 2.6. Agree.

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

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

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

AND

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

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

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

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

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

Question 12: Do you agree with the Strategic Objectives?

AND

Question 13: Do you agree with the Spatial Strategy?

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

Objective 2 and 3

“Prioritise deliverable and developable sites”

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

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

Spatial Strategy

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

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

- 3.12. We **agree** with the proposed policy on Northern Areas.
- 3.13. Draft Policy GM-Strat 6 (Northern Areas) states that GMSF will seek to deliver a “*significant increase in the competitiveness of the northern areas...a strong focus on urban regeneration and enhancing the role of the town centres, complemented by the selective release of Green Belt in key locations that can help boost economic opportunities and diversify housing provision.*”
- 3.14. In the case of draft Policy GM Allocation 2 – Stakehill, the selective release of Green Belt in this location is strongly supported. However, the Green Belt release does not go far enough. For the reasons set out in response to question 78, the retention of a ‘strategic area of Green Belt south of Thornham Lane’ is completely unnecessary and without justification. Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall (as set out in our response to question 78).
- 3.15. Given the excellent sustainability credentials of the Milne Trust land south of Thornham Lane and west of Stakehill Lane (as referred to in response to question 78) and its identification as a key location for boosting economic opportunities and diversifying Rochdale’s housing stock, its release from the Green Belt alongside the remainder of the proposed Stakehill allocation is critical in facilitating the employment-led mixed-use development of the site.
- 3.16. As demonstrated in the response to question 78, the site lies within a larger parcel which scores poorly against the purposes of the Green Belt and ultimately its removal from the Green Belt is fully justified.

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

- 3.17. We strongly **agree** with draft Policy GM-Strat 7 and the draft Policy GM Allocation 2 (Stakehill) as one of three major sites to deliver a significant amount of employment floorspace and housing.
- 3.18. The identification of the proposed Stakehill allocation is strongly supported. The Milne Trust has a substantial land holding within the allocation area, including land to the north and east

of Stakehill Industrial Estate and land south of Thornham Lane and west of Stakehill Lane, both of which already largely benefit from the necessary infrastructure to facilitate its expansion for employment-led mixed-use development in the short term.

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

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

4. Response to questions in draft GSMF Chapter 6

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

AND

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

- 4.1. We strongly **agree** with the proposed policy for supporting long-term economic growth in GM (draft Policy GM-P 1).
- 4.2. We also strongly **agree** with the proposed policy for employment sites and premises (draft Policy GM-P 2).
- 4.3. There is strong support for the identification of the M62 North East Corridor growth area and the proposed allocations which make up the strategic area, including draft Policy GM Allocation 2 (Stakehill).
- 4.4. The key locations identified in draft Policy GM-P 1, which includes the M62 North East Corridor, will bring forward a strong portfolio of prime investment opportunities for new floorspace as required by draft Policy GM-P 2, with many being particularly suitable for prime growth sectors and specialisms, including draft Policy GM Allocation 2 (Stakehill). This includes the selective removal of land from the Green Belt to provide the quality of employment land supply necessary to deliver the required scale of long-term economic growth, as set out in draft Policy GM-P 3 'Office Development' and draft Policy GM-P 4 'Industry and Warehousing Development'.
- 4.5. However, the Green Belt release does not go far enough. For the reasons set out in response to question 78, the retention of a 'strategic area of Green Belt south of Thornham Lane' is completely unnecessary and without justification. Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall (as set out in our response to question 78).
- 4.6. Given the excellent sustainability credentials of the Milne Trust land south of Thornham Lane and west of Stakehill Lane (as referred to in response to question 78) and its identification as a key location for boosting economic opportunities and diversifying Rochdale's housing stock, its release from the Green Belt alongside the remainder of the proposed Stakehill allocation is critical in facilitating the employment-led mixed-use development of the site. It also serves an important function by offering flexibility to the allocation through its suitability for key supporting uses such as a petrol filling station, service station and/or overnight HGV parking.
- 4.7. Furthermore, draft Policy GM-P 2 states that existing employment areas that are important to maintaining a strong and diverse supply of sites and premises throughout Greater Manchester will be protected from redevelopment to other uses and nurtured to ensure they remain competitive. The Milne Trust support the protection of existing employment areas, such as Stakehill Industrial Estate.

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

- 4.8. We strongly **agree** with draft Policy GM-P 4 (Industry and Warehousing Development) which states that at least 4,220,000sqm of new industrial and warehousing floorspace will be

provided in GM over the period 2018-2037.

- 4.9. To achieve this, it is acknowledged that a high level of choice and flexibility will need to be provided in the supply of sites for new industrial and warehousing floorspace, maximising the key locations identified in draft Policy GM-P 1 and significantly increasing the supply of high-quality sites across the northern parts of Greater Manchester to help increase northern competitiveness.
- 4.10. Given the excellent sustainability credentials of the Milne Trust land south of Thornham Lane and west of Stakehill Lane (as referred to in response to question 78) and its identification as a key location for boosting economic opportunities and diversifying Rochdale's housing stock, its release from the Green Belt alongside the remainder of the proposed Stakehill allocation is critical in facilitating the employment-led mixed-use development of the site.

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

- 4.11. An independent assessment of the demand for employment land and premises in Rochdale was undertaken by Colliers. The assessment concludes that there is a demand through the market for new employment land and premises in the Rochdale, Middleton and Heywood area. The evidence provided by both Colliers and the RDA demonstrate that there is not enough supply within the North West to meet the market demand. The supply for large scale operators is currently not of sufficient quality or spec to meet the operator's requirements.
- 4.12. The provision of a significant number of dwellings is required to complement the need for a substantial increase in employment floorspace whilst also supporting Rochdale's housing land supply.
- 4.13. As set out in response to question 78, the development of a range of high-quality and flexible employment land and housing and complementary mixed-uses on Milne Trust land north and east of Stakehill Industrial Estate and land south of Thornham Lane and west of Stakehill Lane, which form part of draft Policy GM Allocation 2, would provide a significant contribution to addressing these demands in the short-term.

5. Response to questions in draft GMSF Chapter 7

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

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

Standard Methodology

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

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

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

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

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

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

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

Affordable Housing

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

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

Phasing

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

Summary on the scale of housing

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

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

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

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

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

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

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

- 5.31. There are concerns raised in relation to question 43 and 45 on the over-reliance on apartments is also relevant to this question. The suggested densities in draft Policy GM-H 4 are skewed towards the delivery of apartments in city and town centres, which runs the risk of resulting in an under-provision of family housing. Draft Policy GM-H 4 doesn't plan for a delivering and supporting a mix of different housing types, sizes and densities of development across the region, which is what is required.
- 5.32. Sites delivering family housing, and larger, higher value properties (as required in draft Policy GM Allocation 2), should be able to come forward at densities appropriate to that site and its surroundings. It shouldn't automatically be assumed that such schemes have to be low density. Therefore, greater flexibility should be incorporated into future density policies.

6. Response to questions in draft GMSF Chapter 8

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

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

Green Belt release

- 6.4. The Milne Trust supports the removal of land north and east of Stakehill Industrial Estate which lies within Green Belt parcel ref: RD62 and within the proposed Stakehill allocation, from the Green Belt. Its removal will facilitate the employment-led mixed-use development of the site including residential in the short-term. This, including site deliverability, is discussed further in separate representations submitted to the GMSF in the context of Milne Trust land north and east of Stakehill Industrial Estate.
- 6.5. However, the Green Belt release does not go far enough. For the reasons set out in response to question 78, the retention of a 'strategic area of Green Belt south of Thornham Lane' is completely unnecessary and without justification. Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall (as set out in our response to question 78).
- 6.6. Given the excellent sustainability credentials of the Milne Trust land south of Thornham Lane and west of Stakehill Lane (as referred to in response to question 78) and its identification as a key location for boosting economic opportunities and diversifying Rochdale's housing stock, its release from the Green Belt alongside the remainder of the proposed Stakehill allocation is critical in facilitating the employment-led mixed-use development of the site.

7. Response to question 78 in draft GMSF Chapter 11

Question 78 – Do you agree with the proposed Policy GM Allocation 2: Stakehill?

- 7.1. We **mostly agree** with the proposed allocation, within which the Milne Trust is promoting substantial land holdings located immediately north and east of Stakehill Industrial Estate, Middleton, and south of Thornham Lane and west of Stakehill Lane, Slattocks.
- 7.2. The land forms part of the wider Stakehill allocation which proposes:
- 250,000 sqm of high quality, adaptable, employment space; and
 - 900 dwellings.
- 7.3. An independent assessment of the demand for employment land and premises in Rochdale was undertaken by Colliers. The assessment concludes that there is a demand through the market for new employment land and premises in the Rochdale, Middleton and Heywood area. The evidence provided by both Colliers and the RDA demonstrate that there is not enough supply within the North West to meet the market demand. The supply for large scale operators is currently not of sufficient quality or spec to meet operator's requirements.
- 7.4. The provision of a significant number of dwellings is required to complement the need for a substantial increase in employment floorspace whilst also supporting Rochdale's housing land supply.
- 7.5. The development of a range of high-quality and flexible employment land and housing and complementary mixed-uses on Milne Trust land would provide a significant contribution to addressing these demands in the short-term. As stated, separate representations have been submitted promoting Milne Trust land north and east of Stakehill Industrial Estate, Middleton. These representations are made to promote Milne Trust land south of Thornham Lane and west of Stakehill Lane, Slattocks. The site's deliverability in the short-term is set out below.

Deliverability – Suitability and Sustainable Development

- 7.6. In accordance with Annex 2 of the NPPF (February 2019), for a site to be considered deliverable it should, be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing can be delivered on the site within five years. Whilst it is acknowledged that the NPPF definition of deliverable applies housing, it is considered appropriate to assess the deliverability of the proposed employment-led mixed-use development, including residential, against this definition.
- 7.7. The following sub-sections clearly demonstrate that land south of Thornham Lane and west of Stakehill Lane is deliverable and meets the criteria of the definition contained within Annex 2.

The site is available now

- 7.8. The land shown at **Appendix 1** of these representations is wholly owned by the Milne Trust, who is actively promoting the site for development in the short-term.
- 7.9. As such, there are no land ownership constraints that would hinder the delivery of development at the site in the short term. The site can come forward in isolation in the short-term or as a first phase of the wider allocation.

The site is suitable

- 7.10. The site, as with all the draft Policy GM Allocation 2 area, is strategically well located to deliver employment-led mixed-use development. The site is bound by Thornham Lane to the north, Stakehill Lane to the east, the A627(M) to the south and the rear of properties on Rochdale Road to the west.
- 7.11. Accessed via Slattocks Roundabout immediately south west of the site, the A627(M) leads northbound into the centre of Rochdale and to the M62. The M62 provides direct links to key towns and cities in the north of England, including eastbound to Huddersfield, Leeds and Hull, and westbound to Warrington, St. Helens and Liverpool (via a short section on the M60 Manchester Ring Road).
- 7.12. The site is approximately 3 miles north of junctions 20 and 21 of the M60 Manchester Ring Road which provides connections to the majority of GM's Key Centres and links to the national motorway network.
- 7.13. On a more local level, the site is sustainably located, with the services and facilities in Slattocks within easy reach of the site by walking and cycling and also a range of public transport options, including Bus Route 17 which provides direct connections between Rochdale – Castleton – Middleton – Blackley – Collyhurst - Manchester.
- 7.14. Whilst already a highly sustainable site for employment-led mixed-use development including residential and supporting uses, the requirements of proposed Policy GM Allocation 2 also make provision for a number of improvements to access and public transport, including:
- Improvements to public transport to and within the area to promote more sustainable travel and improve linkages to the employment opportunities from surrounding areas (Criterion 6);
 - Be designed in a way to maximise the benefits of the potential new rail station at Slattocks (Criterion 7); and
 - Provide good quality walking and cycling routes to connect to new and existing residential areas and local transport hubs in order to encourage sustainable short journeys to work and promote healthier lifestyles (Criterion 8).
- 7.15. The proposed improvements to access and public transport are supported.
- 7.16. Milne Trust land south of Thornham Lane and west of Stakehill Lane is highly flexible owing to its location directly adjacent to the A627(M) and Slattocks Roundabout. The site has the flexibility to accommodate employment and/or residential development and/or supporting uses such as a petrol filling station, service station and/or overnight HGV parking (as required by Criterion 9).
- 7.17. The suitability of the site to accommodate future employment land, housing and a mix of other complimentary uses has already been established through the identification of the site as a mixed-use housing allocation, which is supported. Therefore, it is vital that this site continues to be included as a future mixed-use allocation as the GMSF progresses given that it forms an essential part of Rochdale's future employment and housing strategy. Indeed, the GMSF extols the site's potential, confirming that:

“Stakehill provides a significant opportunity for both Oldham and Rochdale to contribute to the future economic growth of Greater Manchester, capitalising on its proximity to the motorway and rail network. It has the potential to provide a significant contribution to the sub-regional requirement for employment floorspace within key growth sectors and attract additional investment and economic activity to the

area. The level of housing provided will contribute towards the delivery of our housing need, diversifying our housing stock and supporting the proposed employment opportunities across the Northern Gateway and elsewhere.”

- 7.18. A range of technical and baseline studies have already been carried out at the site which have informed the indicative plan for the site. A summary of this work and the initial findings is set out below which demonstrates that there are no technical constraints to delivering employment-led mixed-use development at the site in the short term. This represents a strong commitment to developing the site.

Masterplan

- 7.19. The plan at **Appendix 1** shows details of access proposals and development parameters.
- 7.20. Feasibility work carried out in the preparation of the indicative plan confirms that Thornham Lane is of a sufficient width to accommodate access and the safe movement of vehicles associated with the development of the site. Thornham Lane can accommodate access into the Milne Trust land to the south to facilitate its development in the short-term without prejudicing the development of the remainder of the allocation.
- 7.21. The indicative plan shows that the existing landscape buffer along the southern boundary can be significantly strengthened without impeding the developable areas to ensure an attractive defensible Green Belt boundary is provided (as required by Criterion 11 of draft Policy GM Allocation 2).

Landscape and visual impact

- 7.22. The site is not located within a ‘sensitive area’. It is also well screened and enclosed by existing development and infrastructure, therefore, the development will not have any negative impacts on the surrounding landscape.
- 7.23. Initial design work shows that due to the site topography, and with the addition of soft landscaping to provide perimeter screening, development will not have a significant visual impact when the site is seen in long views. Further, the site is surrounded by urbanising influences and therefore will be seen as an infill site and will not have a significant impact on the landscape.

Ecology

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

Flooding and drainage

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

Traffic and transport

- 7.28. As set out above, the indicative plan confirms that Thornham Lane is of a sufficient width to accommodate access and the safe movement of vehicles as a result of the development of the site.
- 7.29. As set out above, the site is in a highly sustainable and strategic location for employment-led mixed-use development, including supporting uses such as a petrol filling station, service station and/or overnight HGV parking (as required by Criterion 9). In terms of residential development, the site is within walking and cycling distance to the amenities and services in adjacent Slattocks and direct public transport connections to Rochdale, Middleton and Manchester City Centre. As part of any scheme forthcoming, residents would be encouraged to utilise the various public transport options available within the vicinity of the site, reducing reliance on the use of private vehicles.
- 7.30. From an employment land perspective, the site is excellently located geographically in the heart of the Northern Powerhouse region, is adjacent to the A627(M) which provides direct connections to the national motorway network and has a substantial workforce catchment from adjacent towns including Rochdale, Chadderton and Middleton.

Air quality and noise

- 7.31. Whilst the A627(M) is immediately south of the site and is a designated Air Quality Management Area (AQMA), in-design mitigation measures will be incorporated within the development to ensure that sensitive receptors are not potentially exposed to poor air quality or adverse noise impact.
- 7.32. Furthermore, careful consideration of the site accesses and internal circulation arrangements will ensure that exhaust emissions and noise associated with the additional traffic generated by the development is not expected to result in significant adverse impacts to existing and future residents or the AQMA.

Heritage

- 7.33. There are no heritage assets located within the site boundary.
- 7.34. There are, however, three heritage assets in the site vicinity. These are: Rochdale Canal Slattocks Top Lock (Number 54) and Adjoining Bridge (Grade II Listed – to the west of the site); Church of St John (Grade II Listed – to the north of the site); and Thornham Parish War Memorial (Grade II Listed – to the north of the site).
- 7.35. Development of the site will pay due regard to the significance of these heritage assets and their settings, incorporating necessary mitigation measures in the scheme design to ensure there would be no adverse impact on the heritage value of these assets.

Topography

- 7.36. The topography of the site is well suited to development and does not present any constraints.
- 7.37. Topography will be considered as part of the overall landscaping framework strategy and as suggested by draft Policy GM Allocation 2 Stakehill, will include good quality boundary treatment to provide an attractive defensible Green Belt boundary.

Utilities

- 7.38. It is anticipated that proximity to the infrastructure and utilities in adjacent Slattocks would be utilised to serve future development and end-users at the site. Formal applications are being made to the relevant statutory network operators to confirm the availability of capacity within the existing networks in the vicinity of the site.

The site is achievable

- 7.1. There are no technical constraints that would prevent development being delivered at this site. The site is controlled by the Milne Trust who is ready to bring the site forward for development.

Scheme benefits

- 7.2. There are a number of benefits that will be realised for the local area and borough as a result of developing the site for a mix of uses. The significant economic, social and environmental benefits of such a scheme coming forward include:
- Provision of wide-range of high-quality, flexible employment floorspace within an attractive environment with a focus on advanced manufacturing, logistics and other growth industries;
 - Provision of a substantial mix and quantum of jobs, feeding off the nearby populations of Slattocks, Middleton, Rochdale and Chadderton;
 - Complimentary mixed-uses to support the employment and housing development, including the potential for a petrol filling station, service station and/or HGV overnight parking;
 - Provision of a mix of housing, including family homes to help address the local needs of existing residents and the forecast requirements for more housing across the Borough over the next five years;
 - Delivery of high-quality and executive homes to broaden the housing offer of the borough, to complement the smaller and more affordable homes available;
 - Provision of an extensive area of accessible public open space, green corridors and amenity space available for new and existing residents; and
 - Opening up the site with new links through the site to surrounding paths and bridleways.
- 7.3. The site is therefore deliverable and represents sustainable development, offering a plethora of economic, social and environmental benefits.

Draft allocation policy requirements

- 7.4. The Milne Trust strongly support the identification of its land holdings for inclusion within the proposed Stakehill allocation. There are however some minor changes required to make draft Policy GM Allocation 2 more robust.
- 7.5. These criteria are discussed in turn with reasons given for the Milne Trust's suggested amends in order to make draft Policy GM Allocation 2 more robust.

Criterion 3*Masterplanning*

- 7.6. We do not agree that the whole of the allocation needs be in accordance with a masterplan.
- 7.7. Criterion 3, as currently drafted is contrary to paragraphs 11 and 59 of the NPPF. It is also contrary to paragraph 44d) of the NPPF. Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall.
- 7.8. Artificially restricting sustainable development until after a masterplan has been agreed, would be contrary to NPPF paragraph 11 that applies a presumption in favour of sustainable development and paragraph 11a) that requires plans to be sufficiently flexible to adapt to rapid change. It would also be contrary to NPPF paragraph 59 (the Government's objectives of significantly boosting the supply of homes) and paragraph 80 (the Government's ambition to building a strong, competitive economy).

- 7.9. The section below explains why the development of Milne Trust land in the short-term, for which masterplans are progressing, would constitute sustainable development and why they could appropriately be delivered ahead of any masterplan for the wider allocation. A separate response to this point is given in the representations promoting Milne Trust land north and east of Stakehill Industrial Estate, Middleton. As stated, these representations promote Milne Trust land south of Thornham Lane and west of Stakehill Lane.
- 7.10. The site is enclosed by built development or physical barriers on all sides, with Thornham Lane to the north, Stakehill Lane to the east, the A627(M) to the south and the rear of properties on Rochdale Road to the west. It has dense trees to the north, east and south boundaries providing a sense of containment.
- 7.11. The site, despite its washed over Green Belt designation, is well contained and its sprawl would be restricted to the limits of the site boundaries. As set out in further detail below, it is therefore highly inappropriate that the site has been identified for retention as a strategic wedge of Green Belt to prevent the merging of settlements already permanently separated by the A627(M).
- 7.12. Given the site's context, it can come forward in advance of any masterplan. Employment land and/or housing and/or supporting uses would be designed so that it sensitively integrates with the existing urban area, provides an appropriate mix and quantum of floorspace and housing and delivers affordable housing to meet the identified need. Waiting for an allocation-wide masterplan to be developed would serve no purpose on this particular part of the allocation which already has a masterplan progressing. Instead, it would frustrate the delivery of sustainable development in the short-term.

Design codes

- 7.13. Whilst it is acknowledged that new development should achieve a good level of design quality and there is support in principle for development at the site to be of an excellent design, there is objection for the suggested mechanism for securing this to be through a set of design codes.
- 7.14. There is no definition as to what a design code constitutes or explanation as to the mechanisms for agreeing such codes and then subsequently enforcing them.
- 7.15. Taking the definition from Annex 2 of the NPPF, a design code is *"a set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area"*.
- 7.16. Design codes are typically used on very large sites, where it is envisaged the development will be delivered in multiple phases by a number of different developers. In those instances, having a set of design codes will ensure that the entire site is developed in a comprehensive manner and that all the different developers have signed up to a set of design parameters and principles that they can't deviate from.
- 7.17. Whilst it is acknowledged that the site forms part of a much larger allocation, as set out above, it is very well contained. Furthermore, the site is wholly owned by the Milne Trust who are actively promoting the site for development in the short-term. There are not multiple phases or end developers that require detailed design codes to ensure there is a joined-up approach for this part of the allocation. A masterplan is already progressing to bring the site forward in the short-term.
- 7.18. It is appreciated that the development of this site does need to follow a comprehensive approach that shows how the site in its entirety could come forward as one single and integrated scheme. However, the application process provides the appropriate route for this. Indeed, the application being prepared will undertake detailed site analysis in terms of design, layout and landscaping etc and be demonstrated through. In short, there is no need

for an extra burden to be placed on this site in terms of working up a set of design codes; it is unnecessary.

- 7.19. Furthermore, there is a lack of clarity as to at what stage of the process the design codes should be set and how codes would be applied to developments coming forward in phases. There is a concern that adding in this extra layer to the overall process could potentially delay sites coming forward and impact upon an area's ability to significantly boost housing delivery in the short term.
- 7.20. In summary, there is no evidence underpinning the requirement to impose design codes, therefore, it is requested that this is removed from the proposed Stakehill allocation requirements.
- 7.21. Notwithstanding this, the Milne Trust and its delivery partners are positively engaging with RMBC to discuss the design and layout approach to this site to ensure that a comprehensive scheme across the entire site, which responds well to its surroundings, is delivered.
- 7.22. We suggest the following alterations to Criteria 3 to allow land south of Thornham Lane and west of Stakehill Lane to come forward in the short term in accordance with its own masterplan. (deletions with ~~strike through~~, additions in **bold**):

*Criterion 3. Achieve excellent design and sustainability through masterplanning and the use of design codes for ~~the whole site~~ **the land north of Thornham Lane** to ensure comprehensive development.*

Criterion 5

- 7.23. Having reviewed the Green Belt Assessment (2016) for the parcel within which the site lies and which ultimately informs the identification of sites in the GMSF, we consider the site to make a significantly lower contribution to Green Belt when assessed against the five purposes of the Green Belt than is purported in the Green Belt Assessment (2016).
- 7.24. Milne Trust land south of Thornham Lane and west of Stakehill Lane is located in Green Belt parcel ref: RD56 in the Green Belt Assessment (2016). It scores as follows against the five Green Belt purposes:

Parcel Ref	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Purpose 4 Rating
RD56	Strong	Moderate	Strong	Strong	No Contribution

- 7.25. As per Criterion 5 of draft Policy GM Allocation 2, it is proposed to remove the vast majority of parcel ref: RD56 from the Green Belt but with the retention of a "strategic area of Green Belt between the A627(M) spur and Thornham Lane to maintain separation between the urban areas of Rochdale and Middleton".
- 7.26. Given the parcel area extends to circa 100ha, we do not consider it a fair assessment of the parcel as a whole. It is simply too large to accurately assess the various smaller land parcels which make up the larger parcel ref: RD56 and as a result the Green Belt parcel's performance against the five purposes is skewed. As such, Indigo has carried out its own assessment of the Milne Trust land which we consider to score as follows, with reasons give against each:
- **Purpose 1a – Weak** – The parcel is immediately east of Slattocks and has existing urbanising features within, including terraced houses to the north-west and south -west and a church to the south. We consider the sense of openness to be significantly

compromised as a result. The parcel is well-contained by strong physical barriers on all sides – Slattocks to the west, the M62 to the north, and the A627(M) to the east and south. Given the parcel is highly restricted by physical barriers, the parcel plays a very limited role in checking the unrestricted sprawl of Castleton.

- **Purpose 1b – No Contribution** - We strongly disagree that the parcel contributes towards checking unrestricted sprawl – Slattocks to the west, the M62 to the north, and the A627(M) to the east and south. The physical barriers alone are sufficient in checking the unrestricted sprawl of Castleton as its development will be completely contained within them. It therefore has no contribution to this purpose.
- **Purpose 2 – Weak** – As stated above, the parcel is well-contained by strong physical barriers on all sides – Slattocks to the west, the M62 to the north, and the A627(M) to the east and south. Given the parcel is highly restricted by physical barriers, the parcel plays a very limited role in checking the unrestricted sprawl of Castleton. The physical barriers will also prevent the merging or physical coalescence of neighbouring settlements.
- **Purpose 3 – Weak** – The parcel is immediately east of Slattocks and has existing urbanising features within, including terraced houses to the north-west and south-west and a church to the south, the M62 along the north boundary and A627(M) along the east and south boundaries severely limit the connection of the parcel with the characteristics of the countryside. Encroachment of urbanised built development has occurred, and the visual influence of adjoining physical barriers ensures that the parcel displays very limited characteristics of the countryside.
- **Purpose 4 – No Contribution** – it is agreed that the parcel has no contribution towards the setting and ‘special character’ of a historic town(s).

- 7.27. The Green Belt Assessment for parcel ref: RD56 scores the parcel as ‘moderate’ against Purpose 1b (does the parcel protect open land from the potential for urban sprawl to occur?). The accompanying notes and acknowledges that the parcel *“has significant and durable barrier features with...the A627(M) on the eastern and southern border. These play a strong role inhibiting urban sprawl occurring within the parcel. However they do not prevent potential for urban sprawl from the urban edge to the west.”*
- 7.28. The parcel is included in draft Policy GM Allocation 2 for strategic mixed-use development which will naturally lead to future development from the urban edge to the west. However, development at the site will be well-contained by the strong physical barriers of the M62 and A627(M) to prevent urban sprawl beyond its boundaries into the adjacent Green Belt parcel to the east (ref: OH13) or merging with beyond the A627(M) to the south (land north and east of Stakehill Industrial Estate).
- 7.29. The retention of Milne Trust land bound by Thornham Lane and Stakehill Lane as Green Belt to maintain separation between Rochdale and Middleton is wholly unnecessary and without justification. The allocation is already separated by a strong physical barrier, the A627(M), which is banked on either side. Furthermore, there are dense landscape buffers along the southern boundary of the land south of Thornham Lane and along the northern boundary of land north of Bentley Avenue providing natural separation approximately 15 metres between the motorway and the developable area of the site. These landscape buffers can be strengthened as the allocation comes forward.
- 7.30. Should a residential scheme come forward at the site, amenity space / landscaping could be located to the south of the site to simultaneously ensure provision of public open space for existing and future residents whilst enhancing and strengthening the already significant buffer between the site and land to the south of the allocation area (land to the north and east of Stakehill Industrial Estate). In doing so it would also soften the appearance of the A627(M).
- 7.31. The site topography, which gently slopes down from east to west, is well suited to

development and would limit any visual impact from the surrounding area. Conversely, land to the east of the proposed Stakehill allocation, which rises steeply from west to east towards the A627(M) boundary, is highly visible to the surrounding area. It is highly unlikely that a high density of development to the far east of the allocation will be suitable given the visual impact on land further east. Such a buffer is not necessary to the south of the site for reasons set out above and should therefore be removed.

- 7.32. In summary, the parcel is limited in its contribution to the five purposes of the Green Belt. In particular, Milne Trust land south of Thornham Lane and west of Stakehill Lane makes a very limited contribution and consequently there is no basis for its retention as part of a strategic area of Green Belt within the proposed Stakehill allocation.
- 7.33. Paragraph 139 of the NPPF states that, inter alia, when defining Green Belt boundaries, plans should “*not include land which it is unnecessary to keep permanently open*” (criterion b). Whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall.
- 7.34. As demonstrated in response to this question, the parcel within which the site lies scores poorly against the five purposes of the Green Belt and should be scored far worse than in the Green Belt Assessment (2016). Its proposed retention as Green Belt is wholly unnecessary, as there are no justifiable reasons why the land must be kept permanently open. As such, it should be removed from the Green Belt to support the employment-led mixed-use development of the site, noting its flexibility to accommodate a range of uses.
- 7.35. Furthermore, it is acknowledged in the Green Belt Topic Paper (2019) that land to the west of Stakehill Industrial Estate (site ref: 28) is proposed to be added to the Green Belt to offset the loss of the significantly poorer quality Green Belt within the proposed allocation. The Milne Trust is supportive of this as it serves a significantly more important function for the Green Belt than parcel refs: RD56 and RD62, and particularly land south of Thornham Lane which is proposed to be retained as a strategic area of Green Belt. It will also ensure a dense area of Green Belt lies between Middleton and the proposed Stakehill allocation and in doing so further maintain separation between Middleton and Rochdale.
- 7.36. In order to make the policy more robust and comply with paragraph 139 of the NPPF, Criterion 5 should be removed entirely from the requirements of draft Policy GM Allocation 2 (Stakehill).

Site selection criteria for Green Belt sites

- 7.37. Indigo Planning has also carried out its own assessment of the proposed Stakehill allocation, in the context of land south of Thornham Lane and west of Stakehill Lane, against the site selection criteria for Green Belt sites contained within the GMSF Site Selection Topic Paper (2019). There are seven criteria in total.
- 7.38. The Topic Paper concludes that the proposed Stakehill allocation meets the requirements of criterion 3 and 5, however Indigo considers the criteria and methodology to require amendments based on the following comments:

Criteria	Criteria Description	Response
1	Land which has been previously developed and/or land which is well served by public transport	Whilst the site is not previously developed, the site is well served by public transport as set out in our response to question 78.

2	Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors – this includes areas such as Port Salford and Manchester Airport/HS2 Airport Station	<p>It is not possible for all sites across Greater Manchester to be located in close proximity of the two key assets identified. Imposing this criterion would mean that areas outside of Manchester and Salford would automatically fail against this criterion.</p> <p>Whilst it is important to ensure that key assets within Greater Manchester are allowed to continue to thrive and be a focus for future investment and development, dismissing sites simply because they aren't close to these major assets would not go anyway to reducing / reversing the disparities between the north and south of GM.</p>
3	Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth – key areas of focus are the M62 North-East Corridor, Wigan-Bolton Growth Corridor and New Carrington	<p>It is acknowledged that land south of Thornham Lane and west of Stakehill Lane is within the proposed Policy GM Allocation 2 area, which in turn forms one of three allocations within the M62 North East Corridor growth area.</p> <p>However, the proposed retention of this land as Green Belt to ensure separation is not supported, nor is it justified. The land is strategically located to maximise economic opportunities and respond to the need to rebalance north-south competitiveness – a key part of the GMSF. The proposal to retain it as Green Belt is unjustified and contrary to the key objectives for the M62 North East Growth Corridor growth area.</p> <p>As an aside, as stated in response to criterion 1, only scoring sites positively which are close to the three strategic areas of focus would mean any sites outside of these areas would fail. This criterion should be updated to reflect this.</p>
4	Land within 800 metres of a main town centre boundary or 800m from the other town centres' centroids	Applying only an 800m radius from town centres excludes large areas of the majority of boroughs from meeting this criterion. There are strategically located and highly sustainable land holdings and sites more than 800m away from a main town centre boundary, such as land south of Thornham Lane and west of Stakehill Lane, Slattocks.
5	Land which would have a direct significant impact on delivering urban regeneration	Agreed. The development of the proposed Stakehill allocation will have a direct significant impact on delivering urban regeneration in Rochdale and Oldham, generating jobs, homes and inward investment. It is critical that land within the proposed allocation is not unnecessarily retained as Green Belt to ensure the allocation fully maximises its potential to deliver urban regeneration.
6	Land where transport investment (by the	As set out in our response to question 78, the development of the site would deliver significant

	developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits.	economic, social and environmental benefits to the wider community. Development of the site would also enable the Council the opportunity to seek financial contributions from the developer to fund and support sustainable travel options. As such, its proposed retention as Green Belt land is completely unjustified and must be reversed.
7	Land that would deliver significant local benefits by addressing a major local problem/issue.	Development of the site would provide a significant contribution to Rochdale's undersupply of available employment land and would reinforce its housing land supply. As set out in our response to question 78, the development of the site would deliver significant economic, social and environmental benefits to the wider community quickly. As such, its proposed retention as Green Belt land is completely unjustified and must be reversed.

- 7.39. The site scores better against the seven criteria used by the GMSF when assessing the suitability of Green Belt sites. This further supports its removal from the Green Belt to support the wider allocation and adds further justification to the fact that its proposed retention is completely inappropriate and in conflict with the NPPF.

Summary

- 7.40. Taking the above into account, whilst we are supportive of draft Policy GM Allocation 2, minor amendments are required to the policy requirements in order to make the policy more robust overall and to ensure Milne Trust land can come forward in the short term and in isolation of the remainder of the allocation. The following criteria of draft Policy GM Allocation 2 (Stakehill) should be amended as follows (deletions with ~~strike through~~, additions in **bold**):

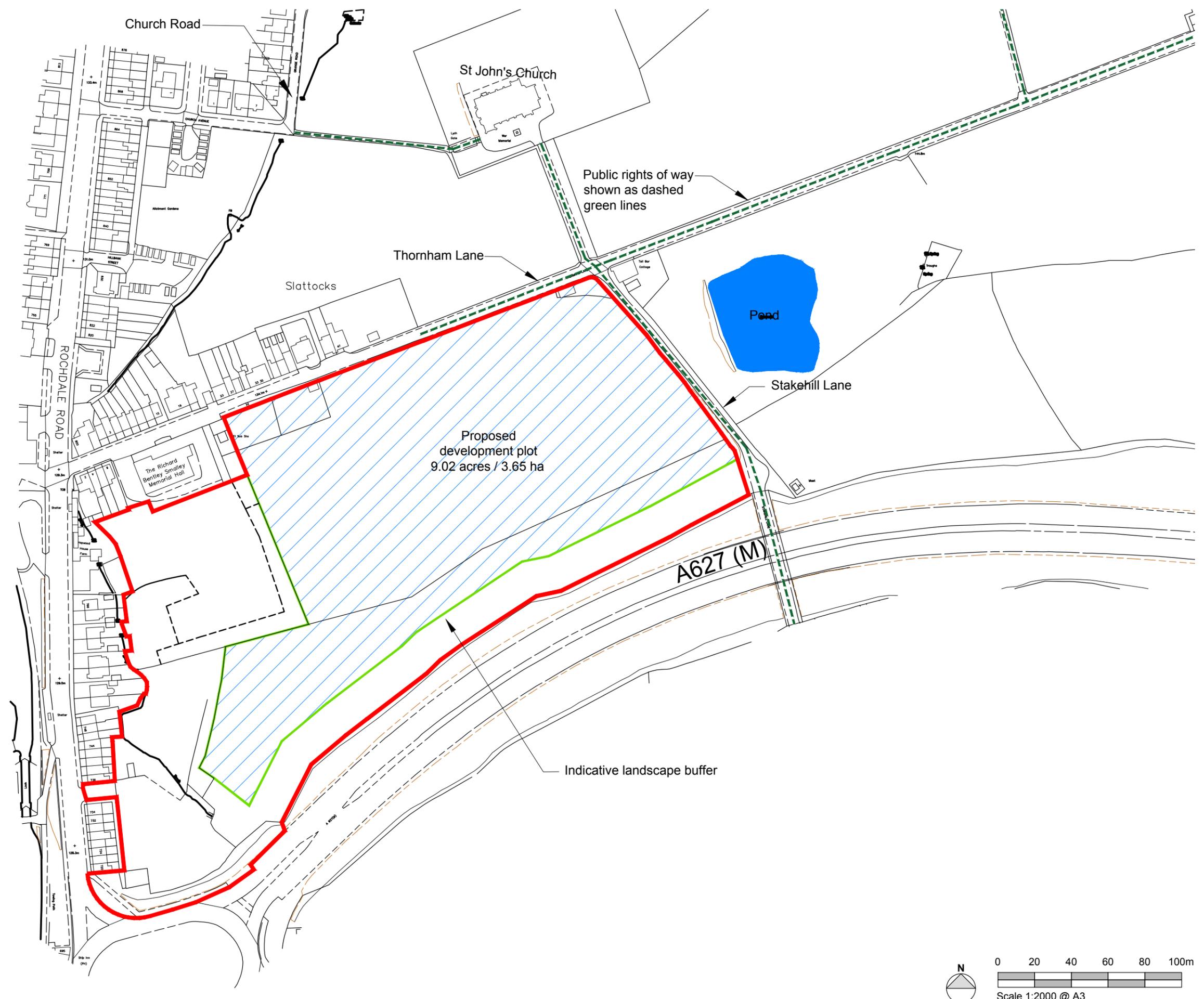
- *Criterion 3. Achieve excellent design and sustainability through masterplanning and the use of design codes for ~~the whole site~~ **the land north of Thornham Lane** to ensure comprehensive development.*
- *Criterion 5 – REMOVE.*

Appendix 1

- All dimensions and levels are to be checked on site.
- Any discrepancies are to be reported to the architect before any work commences
- This drawing shall not be scaled to ascertain any dimensions. Work to figured dimensions only.
- This drawing shall not be reproduced without express written permission from AEW.
- Title overlay drawings and ownership boundaries are produced using all reasonable endeavors. AEW cannot be responsible for the accuracy or scale discrepancy of base plans supplied to them.
- All works are to be undertaken in accordance with Building Regulations and the latest British Standards.
- All proprietary materials and products are to be used strictly in accordance with the manufacturers recommendations.

CDM 2015

Client notified of duties: CDM_PD_Date
 Principal Designer: CDM_PD_Name
 Unless noted below, all known hazards have been highlighted on the drawing:



P2	18/03/2019	ES	AL
Red line boundary and blue hatch area amended to include two allotments to North West of site			
P1	15/03/2019	ES	AL
Initial Issue			
REV	Date	Drawn by:-	Checked by:-

Status Purpose of Issue
 S2 For Information

drawing stage **Feasibility**
 client
Trustees of J.P Milne Will Trust

project
Thornham Lane, Slattocks

drawing title
Location Plan for GMSF representations

date 15/03/19 drawn ES
 scale@A3 1:2000 checked AL

