

Site Assessment Stakehill

Site Plan

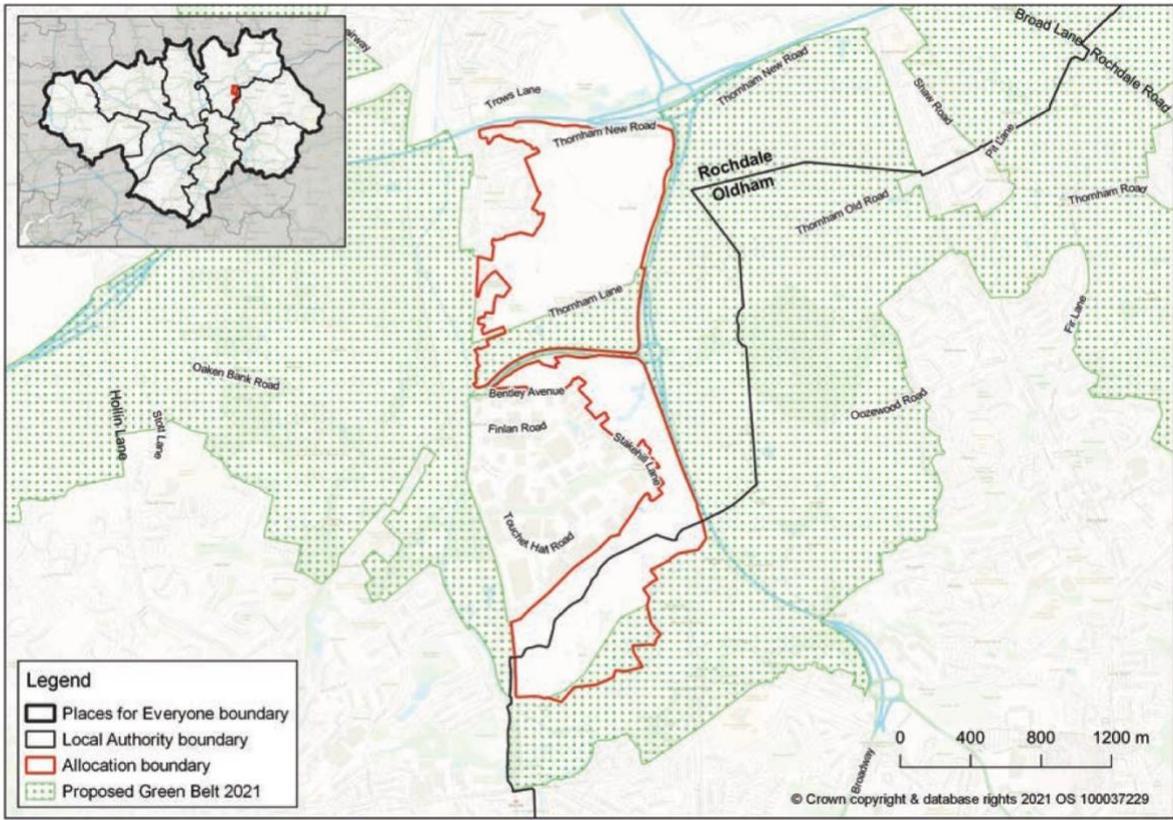


Image Source: PfE – Consultation Plan 2021

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

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

section also borders the Thornham Cricket Club which should be afforded protection as a sporting facility. Spatial Aspect: There are no exceptional circumstances to redraw Green Belt boundary in respect of JPA2 as Rochdale Council have failed to examine all the alternatives including:

- 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 ...*

	<p><i>all other reasonable alternatives have been explored for meeting identified needs for development ... Maximise opportunities on previously developed land and underutilised land ... Optimised densities on sites at accessible locations within the existing land supply.</i></p>
<p>Ground Conditions</p>	<p>The Northern section slopes downwards from the North & East with several undulations and gullies and currently comprises open fields with some limited buildings. It contains a number of ponds, some dating from 1600's, a number of natural springs and field drains</p> <p>The allocation abuts a number of old mine workings which is also within a minerals safeguarding area and the value of this potentially vital resource needs to be assessed.</p> <p>The potential for ground contamination particularly from adjacent uses and impacts on ground water and safety of the development on site need to be more carefully considered prior to the allocation of the site.</p> <p>The SATP para 12.2 states "<i>... 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</i>".</p> <p>And para 12.3 "<i>The site promoters for the northern part of the allocation, which would be housing, ... recommends that a Phase II Geo-environmental Site Investigation is undertaken in order to qualitatively assess any potential contamination</i>".</p> <p>Para 12.4 goes on: "<i>The site promoters for the land to the north and east of Stakehill ... recommends that further targeted investigations be carried out on parts of the site e.g. pond, motorway embankments and further areas that may have been backfilled.</i>"</p> <p>These measures should be undertaken prior to deciding if the allocation is viable and this lack of process does not offer confidence.</p>
<p>Flood Risk and Drainage</p>	<p>There are several natural springs, ponds, and field drains throughout the allocation site. Recent adverse weather events/conditions have seen areas adjacent to the site often flooded from both surface water run-off and higher than average water table levels. The limited flood risk assessment significantly underestimates reality and acknowledges further detailed survey work is needed. This ends up as regular spills from Church Avenue and Bentley Avenue onto the main A664 Rochdale Road and causing very difficult driving conditions at Slattocks Roundabout. Whilst drainage works have been undertaken at the roundabout the problem has not been resolved as proved following further heavy rainfall.</p> <p>Replacing the green fields which act as a soakaway with the hard standings for housing and impermeable roadways/pavements is likely to result in a significant increase in the severity of the flooding. Combined with an antiquated main sewerage/drainage system there is likely to be many more frequent incidences of flooding. If the natural soakaway is lost this will severely exacerbate the flooding which is already occurring regularly. Mitigation</p>

	<p>through the use of SUDS and semi-permeable vehicle standings will not adequately compensate. The proposed expansion of Stakehill Ind Estate will exacerbate the effects of water run-off significantly causing greater problems further down watercourses which continue through Manchester City Centre.</p> <p>The L1 Strategic Flood Risk Assessment for Greater Manchester states that Rochdale is amongst the worst areas for high flood risk.</p> <p>The SATP para 11.4 states: <i>“It was concluded that any flood risk affecting this allocation can be appropriately addressed through consideration of site layout and design as part of a detailed Flood Risk Assessment or Drainage Strategy at the planning application stage”</i>. This leaves questions about the viability of this site unanswered so its inclusion in the PfE plan is unsound. It is of vital importance that detailed investigation, modelling and master planning needs to be undertaken prior to any development. A desktop survey and “look at it later” attitude is not satisfactory when producing plans of this scale.</p> <p>Whilst the indicative plans for the allocation show some mitigation measures (SUDS, permeable vehicle standings – for houses, etc) it remains unclear whether these will be sufficient.</p> <p>Given the importance placed on securing safe and suitable developments in areas at lowest risk from flooding this lack of clarity on flood risk and drainage is wholly unacceptable and does not robustly justify the allocation of the site, particularly given the scale of development being proposed, and the concerns of surface water flooding with the significant increase in hard standing on industrial section of the allocation.</p> <p>Data warns of more frequent flooding events UK extreme events - Heavy rainfall and floods - Met Office.</p>
Transport	<p>The allocation currently has limited accessibility to public transport within the designated parameters. The existing junction of the A627(M) is already rated as poor. The investigation of a new rail station at Slattocks is welcomed but is being used to justify the scale of development as, only when it is a reality, can the allocation be said to be properly accessible and within the criteria used in GMAL calculations. We submit that the use in GMAL of the boundary of the allocation site as a ‘distance to’ public transport access points is unrealistic and inappropriate. It uses a straight line to/from those points. These are unrepresentative of real-life conditions and could see commuters’ journey distances/times to the nearest access point increased dramatically. They should therefore be recalculated for factual authenticity.</p> <p>There is no rail (proposed station) or Metrolink to the area, very limited bus services (particularly Southern employment section) and the local highway network is already severely congested at peak times. Local traffic based on 1,680 homes, suggests anywhere between 1,500 to 4,000 extra private vehicles given the scale of housing & employment space proposed. This will further increase with deliveries to properties and HGV movements to the expanded employment site.</p>

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's Locality Assessment Addendum-Cross Boundary-Stakehill (TLAA-CB-S), shows that pre (Table 8) and post mitigation measures (Table 10), which are merely suggestions, traffic (M62 J20, A627M/A664 Slattocks, A627M/Broadway/Chadderton Way) will continue to be over capacity 'limits' at peak times. Para 12.1.11 states "*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

	<p>potential inclusion of a lorry park (Policy JP Allocation 2, para 13), by over 150% would result in a significant increase in commercial vehicles entering/exiting the LRN and SRN. This would all use the Slattocks Roundabout junction (no other entry/exits are planned for) further contributing to traffic movements and potential congestion issues.</p> <p>The first sentence of TLAA-CB-S para 9.13 makes no sense – it is just wrong.</p> <p>TLAA-CB-S para 10.1.3 makes irrelevant mention of JPA16-Cowlshaw. Its location would not be expected to have any effect on traffic in/around JPA2-Stakehill.</p> <p>TLAA-CB-S para 14.1.3 states “<i>Junction modelling has however demonstrated that the Junction will operate within capacity at 2040.</i>” There is failure to explain how this conclusion has been reached.</p> <p>TLAA-CB-S Table 11 - Final list of interventions: Necessary Local Mitigations; Bus service improvements states that the “<i>17A serves Stakehill in peaks</i>”. It is a single time service at approximate 05.30 Monday to Friday only.</p>
Utilities	<p>Prior to allocation of a site for development it is imperative that assurances are received that the existing infrastructure can accommodate the scale of development being proposed. This clarity has not been provided in relation to this site and is therefore the allocation fails the test of soundness.</p>
Environmental	<p>The site will result in the loss of 167.4ha of Green Belt. The site is noted to perform strongly in relation to a number of purposes for allocating land as Green Belt and the Green Belt harm assessment is noted to conclude that the allocation site plays a moderate to relatively significant role in respect of checking the unrestricted sprawl of the large built-up area and preventing encroachment on the countryside.</p> <p>The Stakehill Allocation Topic Paper, Section C- Environmental (14 Green Belt Assessment), confirms, throughout the Section, that “<i>The assessments considers that release of the allocation would cause ‘high’ harm to Green Belt purposes, but would only have a ‘minor’ or ‘no/negligible impact on adjacent Green Belt.</i>”</p> <p>The allocation is close to Tandle Hill Country Park which provides a highly attractive local viewpoint and whose visual amenity is likely to be detrimentally affected by the development of this site. The proposed mitigations are unlikely to fully mask the development.</p> <p>In relation to ecology, it is noted that the GMCA’s appraisal indicates that any ecological constraints on the site are unlikely to be significant but further surveys are required. It is our view that the evidence base on this important issue is somewhat lacking and is not robust enough to currently warrant allocation of the site.</p> <p>The resultant harm from the release of this Green Belt is significant and the use of ‘exceptional circumstances’ (NPPF para 61 & 160) have not been demonstrated to justify the allocation of this site. Increased urban sprawl in contravention of NPPF para 141. The impact on air pollution and noise pollution from the extensive additional traffic resultant from this development is also of concern to</p>

	<p>local residents both in its impacts on future residents and on those in the local area. Coupled with this is the fact that there is an AQMA outside a primary school within 150m of the southern end of the site allocation. This will be exacerbated by the fact that proposed residents are likely to need to travel by private car to access key services and facilities etc due to this being an unsustainable development.</p> <p>We welcome the Plan's aim contained in Policy JP-S 2 Carbon and Energy. However, its emphasis is on housing and suggests there is insufficient focus on industrial, who are higher-level users of energy. Businesses should be encouraged to use green technologies such as PV/air/ground-source heating and/or green roofing. Green roofs have the added advantage of masking large distribution-type units from distant/high viewpoints. Using PV on roofs means that green fields are not needed for this purpose, as has been seen across the UK, leaving them available for agriculture/leisure/environmental functions.</p>
Historic Environment	<p>The Topic Paper draws attention to a Historic Environment Assessment created to support the Plan. This sets out a number of recommendations for this allocation including on archaeology and the need to protect existing sites and assets. The need to protect the historic environment from inappropriate development needs to be clearly addressed prior to allocation of the site. Without detailed knowledge of what the site contains and associated impacts on the historic environment should assets be found then the site should not be promoted as identification could make the site un-deliverable.</p> <p>The loss of fields, hedges and trees across the allocation will have a negative impact on the local green infrastructure. The majority of this land has been farmed for centuries and the fields, paths and hedgerows are relatively unchanged from early maps. They form an intrinsic part of the character of the area and help delineate the existing settlements from one another. The GMA2 - 4 Stakehill (North) Ecology report states that further in-depth assessments need to be undertaken. This should be done prior to further consideration of this allocation site.</p>
Social	<p>The development on the Northern section of the allocation will adversely and significantly impact on the setting of the 150+ year old Thornham Cricket Club, reducing its natural rural outlook.</p> <p>The COVID-19 pandemic has meant that the public footpaths and byways across the area have seen significantly increased usage. Whilst this has declined, it remains at higher than pre-COVID levels (anecdotally). It contributes to the physical and mental health and well-beings of both local residents and visitors to the area.</p> <p>This is in contradiction to Policy JP-P 6: <i>"To help tackle health inequality new development will be required, as far as practicable, to:</i></p> <p><i>A. Maximise its positive contribution to health and wellbeing, whilst avoiding any potential negative impacts of new development;</i></p>

	<i>B. Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice.”</i>
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 “ <i>the provision of additional ... medical facilities</i> ” could remain an ambition rather than reality.
Planning History	There have been a number of small-scale planning applications (house extensions; repurposing farm buildings; changes/upgrades to industrial units on Stakehill Ind Estate; extension at Thornham Cricket Club). The site is virtually all undeveloped Grade 4 agricultural land adjoining farm buildings/businesses.
Deliverability	<p>Many uncertainties underly the potential development of this allocation, and at its core this is not a deliverable. Access to the Northern section of the site via the secondary route, Thornham New Road, is made difficult by the narrowness of the roadway. No mitigation has been proposed for this.</p> <p>The possibility of a new rail station at Slattocks is not certain. Further modelling and the securing of funding needs to be undertaken prior to the development going ahead.</p> <p>There appears to have only been a desktop flood risk assessment along with a very limited wildlife study – desktop and one day on-site visit – which give an incomplete description of the actual situation. Current traffic issues have not been taken into account and will not be addressed by PfE.</p> <p>There is potential for regionally significant archaeological remains within the site. A full report on the ecology has been deferred.</p> <p>Local flooding, ground conditions, and the geology of the area has received a scant consideration and should be fully investigated prior to further progress towards proposed development.</p> <p>Local Housing Need is being overridden by the proposal.</p>
Anticipated timeframe for availability	Unspecified although the transport modelling is noted to relate to the period 2025-2040
Commentary	
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.

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

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