

Thornham St John's Neighbourhood Forum

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Greater Manchester Combined Authority
P.O Box 532
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2nd October 2021

Dear Sir/Madam,

Re: Places for Everyone Publication (PfE) Plan 2021

I write in relation to the current consultation on the PfE Plan.

Some of our comments relate to general Plan topics and we deal more specifically in relation to the proposed allocation for JPA2-Stakehill which is within our Neighbourhood Area.

I write on behalf of numerous concerned local residents and small businesses who form the designated Thornham St John's Neighbourhood Forum. The officers of the Forum voted to submit this consultation response at a meeting on Saturday 2nd October 2021.

We are keen to ensure that the PfE Plan secures the right development, in the right place and at the right time. As currently drafted, we have no choice but to object to the draft Plan.

We ask that JPA2-Stakehill allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town and local centres, and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework (NPPF).

Our concerns with the PfE Plan draft report as presented are laid out in some detail below. We also endorse and support the response submitted on behalf of the Save Greater Manchester Green Belt Group by the Leith Planning Group (response ID ANON-N3DH-3XEV-K).

Our concerns are as follows:

PfE Plan – Vision:

- Para 3.2 of the Plan includes the statement “... *this Plan is one of many ways in which the vision will be delivered, and many of the necessary actions will lie outside the scope of the Plan*”.

Given that this is a master plan for the next 16 years for Greater Manchester, the statement leaves readers with little choice other than to reject the Plan as it suggests that a number of other documents containing the ‘necessary actions’ will be published – at a later date. It is therefore virtually impossible to appreciate how this current Plan fits in with this overarching ‘strategy’.

Modifications requested

- Further explanation of these ‘necessary actions’ are needed before we can understand how the vision will be delivered.

Viability:

- The ‘Strategic Viability Report – Stage 2 Allocated Sites Viability Report (October 2020)’, tabulates the viability of individual allocations.
The report splits JPA2 Stakehill into North and South sections.
The viability table for the North section, includes ‘Build Costs’ for ‘Flats 1to2, 3to5, 6’. However, the ‘GMA2 - 1 Stakehill (North) Development Framework’ [Redrow Plan] states “The dwelling mix will include a range of housing typologies including, apartments bungalows, townhouses, semi-detached, and detached houses”, thus giving no indication that ‘Flats’ will be included in the development. We believe this leads to spurious and misleading figures for the ‘Blended rate’ in the table. The viability figures are made all the more misleading by the apparent

estimation of other costs, such as the plot itself.

We struggle, as non-professionals, to assess whether these costs and the claimed viability of the site present an accurate picture. The same can be said for the remaining Southern sub-divisions of JPA2- Stakehill as presented.

Modifications requested

- JPA2 Stakehill, if it should remain in the PfE Plan, should be split into two or three sub-allocations, in accordance with the Strategic Viability Report – Stage 2 Allocated Sites Viability Report (October 2020) and be afforded separate considerations.
- Clear and understandable figures should be presented so that non-professionals can easily assimilate them.

Case for Very Special Circumstances:

- The evidence base to support the case for ‘*Exceptional Circumstances*’ to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy. The GMSF ‘Call for Sites’ exercise discounted some, generally smaller sites, in favour of larger ‘strategic’ Green Belt. Many of these discounted were sites should have come under the category of ‘*sequentially preferable*’ and should now be considered. This discounting created an unsafe method for selecting the allocation sites.

Much greater emphasis should have been given to the potential to remediate Brownfield land, land generally already within the prescribed urban areas. Little account has been made of the potential of other sites becoming viable or available over the Plan period.

In addition:

- There is a significant brownfield site (Turner Newall – former asbestos factory) which represents 74 acres of brownfield land desperately in need of remediation, within the urban area, and close to the Town Centre and transport hubs, as opposed to the Green Belt sites proposed for allocation;
- JPA 2 fails to comply with a number of the 7 Site Selection Criteria.
Specifically it fails to comply with: **Criterion 1** - Land which has been previously developed and/or land which is well served by public transport; **Criterion 4** – Land within 800 metres of a main town centre boundary or 800m from the other town centres’ centroids; **Criterion 5** – Land which would have a direct significant impact on delivering urban regeneration; **Criterion 7** – Land that would deliver significant local benefits by addressing a major local problem/issue.
 - Criterion 1 – It has not been previously developed. It is not near a transport hub.
 - Criterion 4 – It is outside of 800m from any town centre.
 - Criterion 5 – As the allocation falls outside the urban area, it cannot be deemed to contribute to urban regeneration.
 - Criterion 7 – No evidence has been presented as to how JPA2 Stakehill would ‘address a major local problem/issue’ within this criterion.
- Building on this Green Belt site does not comply with promoting sustainable development, for the following reasons:
 - Loss of Public access to green space.
 - Increased congestion on roads. Peak period traffic is already above capacity.
 - Increased urban sprawl created by the addition of 1,680 houses and 150,000sqm of employment space and associated infrastructure.
 - 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.
 - Limited access to GP surgeries
 - Risk of unsafe building on old mine workings
 - Loss of ancient hedgerows
 - Loss of habitats for wildlife
 - Loss of food production – local agricultural/farmland
 - Significant encroachment of local settlements – The area’s current housing stock is around 900-1,000. This development will swamp the current community.

Modifications requested

- The Plan should undergo regular reviews and updates over the plan period, before the release of Green Belt, to re-evaluate its need as allocations.
- Brownfield options and viability should be continually reassessed before the release of Green Belt.
- JPA2 Stakehill should be reassessed against the Site Selection Criteria and withdrawn due to its overwhelming unsuitability compared to these.

Evidence Base:

- As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. In Rochdale, the LHN is 8,048 and there is land available in the SHLAA for 7,997 houses without the need to release Green Belt. This figure, along with 1,000 homes in South Heywood, already granted planning permission should supply virtually all the housing requirements for the next 16 years. However, Rochdale are seeking to release enough Green Belt/greenfield land to build an additional 4,000 houses. There is no justification for this release.

Modifications requested

- The viability of Brownfield sites and Green Belt land should be reassessed using revised criteria which give greater weight to the Climate Emergency and peoples' physical and mental health needs.
- The evidence base needs to be revisited to
 - (1) ensure consistency in approach, assessment, and aspirations and
 - (2) to ensure that the Plan being presented at Examination is based on up to date and accurate information.

Covid-19:

- Insufficient consideration has been paid within the Plan to the long-term impacts of Covid, both on the economy and directly on people. It is clear that Covid has had a significant impact on the national economy, and whilst we are in a period of recovery, the long-term impacts on the high street are clear to see. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. Whilst the GMCA argue that the impact of the pandemic is too early to fully understand, there are clear trends resultant that are already apparent, and which could have a determinative impact on development within Greater Manchester. The Plan is therefore unsound as it fails to adequately assess current circumstances and is once again not prepared on the basis of a sound and robust evidence base. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, its High Streets and general housing and employment land requirements.

Modifications requested

- The Covid pandemic along with BREXIT mean a re-evaluation of GM's needs is essential.

Duty to Co-operate:

- Stockport's withdrawal from the GMSF plan in December 2020, and its proximity as a neighbouring authority in the GM City Region meant that the remaining nine Council authorities forming the PfE Plan must cooperate with Stockport.
- The Statement of Common Ground dated August 2021 states that Stockport Council had not yet identified any unmet need. Similarly, paragraph 8.4 in the PfE 'Growth and Spatial Options Paper' notes that an adjustment, based on the 2021 OAN for Stockport has been made to the figure originally assessed as part of the GMSF 2020 preparation. This is meant to take account of Stockport's withdrawal from the Plan and that a potential alternative/addition to this option could have been to propose to meet some of Stockport's need in the PfE Plan area. It also notes that *"Given the embryonic stage reached in the preparation of Stockport's local plan, Stockport Council has not currently established whether or not it will have any surplus/unmet need and if so, what alternatives it has considered for meeting this unmet need. Therefore, it is not possible to identify what such an option might look like in relation to the PfE and consequently it is not considered to be a reasonable alternative to the proposed growth in PfE."*
- In July 2021, Stockport Council announced that using the Government's standard methodology for calculating housing need produces a figure of 18,581 from 2021 to 2038. A supply of sites for 11,097 dwellings has been identified in the latest assessments, meaning that there is a shortfall of sites for 7,484 dwellings. Under the GMSF

Plan some of Stockport's housing need was redistributed to other boroughs in GM. The Stockport Local Plan is expected to undergo Regulation 18 consultation in Autumn 2021, while PfE is currently undergoing Regulation 19 consultation. This will result in the two plans being out of step. It seems highly likely from the published data, that Stockport Council will have an unmet housing need. We also understand that Stockport Council enquired in March 2021 whether the other nine districts in GM were willing to accommodate some of Stockport Council's housing and employment need in PfE, as had been proposed in the former GMSF plan. The published draft of PfE does not make any allowance to accommodate any of Stockport's unmet need. Therefore, we believe that the opportunity for the nine boroughs in PfE to share some of Stockport's housing need has not been adequately explored and the Duty to Cooperate has not been fulfilled.

Modification requested

- The PfE Plan should be withdrawn until an agreement on Stockport Council's housing and employment need and potential shortfall/redistribution can take place.

Legal Compliance:

- Legal compliance with consultation and lack of public awareness with the process are cause for concern.
- Whilst the GMCA maintain that four consultations will have taken place, including this one, very few people were aware of and responded to the November 2014 and November 2015.
- The PfE 'Statement of Consultation' was used by Councils to prove their methods of engagement. Whilst this complied with the letter of the law, in reality they failed to properly engage people, particularly those in the 'difficult to reach' categories.
- The complexity and quantity of information presented meant that even those with a professional background in the respective specialisms, such as flooding, utilities, climate change, and infrastructure, would have struggled in the 12 weeks allowed, to fully immerse themselves in the myriad of interconnecting documentation.

Modification requested

- The PfE Plan should revert to a Regulation 18 consultation and discussions should take place with community interest groups, and agreement as to the appropriate methods of community engagement have taken place and been implemented.
- Clearer and inconsistent documentation must be presented so that a representative number of people can readily and fully engage in the decision making process.

Conflict with Climate emergency declarations:

- It is hard to see how the PfE Plan will be able to meet its goals in 'Addressing Climate Change' given the scale of development proposed in the Green Belt, dismissing its size by approximately 13sq miles across GM.
- This Green Belt loss will inevitably lead to a reduction in biodiversity, not a 'net gain' as is one of its major goals.
- Major Carbon sinks, in terms of Green Belt, farm and agricultural land, will become built environments under the PfE Plan.
- The mitigations suggested, including new public parks, cannot compensate for this loss.
- We agree that bold measures must be undertaken to tackle Climate Change and the immediate emergency we face.
- We support the encouraging people to use alternative modes of transport.
- However, building on Green Belt does the exact opposite of the PfE Plan's in respect of Climate Change.
- We support and endorse Steady State Manchester's consultation response.

Modification requested

- All Green Belt allocations should be removed from The PfE Plan.
- Wildlife and their habitats should be given greater 'weight' and priority in a redrafted Plan.
- The GMCA should take a further look at their aims and goals for Carbon reduction taking on-board Steady State's analysis and proposals.

Housing:

- **Homes:** We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be

seen to be being realistic. PfE aims to release land for 190.8k houses based a population increase of 158.2k people (ONS 2018 Population Projections) over the plan period. This equates to more than one house per person. ONS statistics use an occupancy rate of more than two people per house. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period. These measures would significantly, if not entirely, reduce the need to release Green Belt land as proposed in the Plan.

- **Affordable housing:** The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound. We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.

The Plan acknowledges that it will fail to provide sufficient homes for those 70,000+ on waiting lists (para 7.2 referring to Local Authority Housing Statistics Data Return 2019/20).

- **Local Housing Need (LHN):** The Plan states at para 7.4, Housing Need, the use of Government standard LHN methodology. However, as seen by the following Government statement, this adherence to this standard methodology is not 'must'.

"Put simply, it [the Local Housing Need formula] is a measure of an area's housing need, against which councils must then consider their local circumstances and supply pipeline. Councils draw up a local housing target, taking into account factors including land availability and environmental constraints such as Green Belt." [Response to the Times front page on housing building target analysis by the Campaign to Protect Rural England - MHCLG in the Media \(blog.gov.uk\)](#).

The PfE Plan, para 1.37, states *"By working together we have been able to direct development to the most sustainable areas – primarily the city and town centres – and enable most efficient use of our brownfield land supply."*

This is not evidenced by the inclusion of Green Belt sites such as JPA2 Stakehill.

Modifications requested

- A recalculation of LHN using the most up to date population projections and relative to changes in the need for office space in City/Town Centres and other employment sites which are becoming available due business reconfigurations, principally COVID-19 related.
- Revisiting the viability of Brownfield/Urban sites prior to the inclusion of Green Belt land.

Allocations:

- A significant number of the proposed site allocations are unjustified and not well located. Many of the sites will have detrimental impacts on the highway network, are at risk from flooding and not well located for access to services, facilities, and public transport. Many others will have significant impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. These proposed allocations are therefore deemed to be unsustainable and unjustified and should not be being promoted. The proposed allocations should be re-assessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan. In short, we are asking that the Plan ensure the delivery of the right homes in the right places, and the deletion of inappropriate and undeliverable sites from the Plan.

Other local allocations, Northern Gateway JPA1.1 Heywood/Pilsworth & JPA1.2 Simister/Bowlee, JPA26 Trows Farm, and JPA21 Castleton Sidings, will create knock-on effects on proposals at JPA2 Stakehill.

Taken as a block of developments, the cumulative effects on the local infrastructure, despite the mitigations suggested, will not be sufficient.

This is evidenced in the strategic objection submitted on behalf of the Save Greater Manchester Green Belt Group by the Leith Planning Group (response ID ANON-N3DH-3XEV-K), Transport Section. Other parts of this consultation submission refer to the lack of any detail of other infrastructure 'upgrades' (eg Schools, GP Surgeries, Hospitals) which are necessary for current residents, which will only be exacerbated by the JPA2 Stakehill proposals.

In terms of the employment capacity increases proposed, a number of sites already compete for similar business. This is compounded in Objective 3 of the PfE plan which states *"Facilitate the development of high value clusters*

in prime sectors such as: *Advanced manufacturing*". In the supporting text of many of the employment allocations, *'advanced manufacturing'*, is the buzz-phrase, used almost ubiquitously.

Policy JP-Strat 7 states, in relation to the North-East Growth Corridor, "The development of the area must ensure *that necessary infrastructure is delivered to accommodate the likely scale of development.*"

Modifications requested

- Withdrawal of JPA2 Stakehill or a significant reduction in the scale of development proposed.
 - Infrastructure improvements must be completed prior to the developments proposed.
 - A focus on particular manufacturing/business types at specific allocations may help create nuclei/hubs of expertise.
- **Allocation Boundary:** The PfE plan clearly splits the allocation into two ('Stakehill Topic Paper – JPA2 Stakehill', para 3.1) namely, North- bordered by M62 to north, A627M to east, A627M Slattocks Spur to south, A664 Rochdale Rd to west, and South- A627M Slattocks Spur to north, A627M to east, farmland towards Chadderton Heights to south, Rail line/Stakehill Ind Est to west.

Natural split of allocation by the proposed green corridor, retained Green Belt, between Thornham Lane & Slattocks Link Spur, and the Slattocks Spur itself, strongly indicate that this allocation should be three separate allocations. This split is further manifest in the Topic Paper, Section 25.2 "For the purposes of the viability assessment the site has been split into three distinct parts. Part 1 of 1,380 homes within the part of the site that lies north of the A627(M). Part 2 and 3 refer to the part of the site that is south of the A627(M); part 2 provides analysis of the mixed-use scheme (with 301 residential units) and part 3 as an employment scheme", together with further detailed explanation in Section 26, Phasing.

Whilst these sub-allocations share the road infrastructure, their division is 'promoted' by the documentation. This type of sub-division has been acknowledged and realised at the adjacent Northern Gateway allocation by separation into the sub divisions of JPA1.1 and JPA1.2.

Furthermore, all adjacent allocations will have multiplying effects on the local infrastructure and are consequently interrelated.

Modifications requested

- JPA2 Stakehill, if it should remain in the PfE Plan, should be split into two or three sub-allocations, in accordance with the Strategic Viability Report – Stage 2 Allocated Sites Viability Report (October 2020) and be afforded separate considerations.
- **Amendments to the Allocation Boundary:** Prior versions of the GMSF plan, on which PfE is substantively based, there was no mention of the possible inclusion of the All-in-One garden centre site to the allocation Northern Section. This is evidenced by PfE 'Stakehill Topic Paper – JPA2 Stakehill' (July 2021), para 14.11 "There have been some changes to the allocation boundary since the 2019 GMSF. The most notable change relates to the inclusion of the garden centre site off Manchester Road."

Furthermore, 'GMA2 - 6 Stakehill (North) Phase 1 Geo-Environmental site assessment' (April 2019) was undertaken prior to the inclusion of the garden centre site. At para 5.1 it states "Contaminated Land Officer- A request for contamination information pertinent to the site was sent to the planning department at Oldham Council. At the time of writing, no response has been received." The report authors have clearly been given poor information/instruction given this northern section of the allocation is located within Rochdale Borough, not Oldham.

Modifications requested

- Residents have not been consulted in the previous three consultations quoted within PfE on inclusion of the garden centre site within the allocation.
- The Geo-Environmental site assessment failed to include the garden centre site in its assessment as it was undertaken prior to its inclusion. Anecdotal evidence suggests that prior to the garden centre business being at there, the site was a waste tip for the former Whipp & Bourne business in Castleton. Residents recall boiler ash and metal turnings/swarf being present. More detailed surveying must be undertaken, which should include deep soil/heavy-metals sampling.

For the above reasons

- the Independent Examination should not proceed and the PfE plan should go through a Regulation 18 consultation.
- JPA2 Stakehill should be withdrawn from the PfE Plan.

Green Belt:

- The Plan sets out to release an area of Green Belt, by redrawing the GM Green Belt Boundary, to meet the perceived housing need across the nine authorities. In Rochdale this equates to 21% of the borough's agricultural land. The Plan also fails to recognise the so-called rural economy and the need for agricultural/farmland for the production of food locally. This land also supports jobs/employment and has the potential to support greater numbers. It is also recognised that the farming community play a vital role in maintaining the 'countryside'. This includes stiles on public footpaths and hedgerows/wildlife habitats.

The mitigations proposed in the Plan, through the designation of new Green Belt, are inadequate and unacceptable. Locally, for the JPA2 Stakehill allocation, this new Green Belt is described as an addition. It is already greenfield and in part, school playing fields. It is at the very least, a disingenuous statement to suggest this 'addition' mitigates or compensates for the scale of loss, that being around 160Ha of Green Belt. This theme is repeated throughout the proposals for 'additional' Green Belt.

Insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been inadequate assessment of reasonable alternatives. In order to address this issue, the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.

The 'Stage 2 GM Green Belt Study - Cumulative Assessment of Proposed 2021 PfE Allocations and Addition' page 19, Strategic Green Belt Area 15 Impact of changes on cumulative assessment, para 2.6 states:

"The allocation changes do not affect the analysis provided in the GMSF 2020 cumulative assessment. There would be marginally less containment of the remaining Green Belt land between Stakehill and Chadderton Fold, but not enough to reduce the assessed level of harm. Likewise the small reduction in settlement separation at the south-western corner of the Allocation does not alter the original assessment's acknowledgement that the release of GM2 [JPA2] would result in the merger of Middleton and Rochdale."

Also, 'Green Belt Topic Paper and Case for Exceptional Circumstances to amend the Green Belt Boundary', table, pages 5-6, JPA2 Stakehill, column 2 'Harm impact from allocation on Green Belt purposes' states:

- *"The GM GB Harm Assessment identifies that the majority of the allocation makes a significant contribution to checking the sprawl of Greater Manchester (Purpose 1) and preventing encroachment on the countryside (Purpose 3), as well as a moderate or relatively significant contribution to preventing the merger of Castleton, Middleton and Chadderton (Purpose 2).*
- *A Stage 2 Green Belt second addendum (2021) has been prepared, which assesses the changes that have taken place since the last assessment to allocations and the level of harm to the Green Belt purposes.*
- *The 2021 PfE Plan proposes the retention within the Green Belt of an area of land on the southern edge of the Allocation, the area closest to the settlements of Chadderton Fold and Healds Green.*
- *The land here makes a strong contribution to Green Belt Purpose 1 (checking the sprawl of a large built-up area) and Purpose (safeguarding the countryside from encroachment."*

The 'Stakehill Topic Paper' states:

- (para 14.6) *"The assessments considers that release of the allocation would cause 'high' harm to Green Belt purposes"*

The Plan's 'Site Selection Criteria' appear to have been used to prove the need to include JPA2 Stakehill to the detriment of the NPPF 'Five purposes of Green Belt' and contrary to consideration of Brownfield sites, regarded as 'sequentially preferable' in the 'Call for Sites' assessment.

The PfE Plan para 1.34, states *"...Several of the [employment] sites are large in scale and will be partially delivered beyond 2037. We have also identified a potential growth area in north east Oldham as a Broad Location rather than an allocation to provide flexibility for the future."*

This calls into question the employment space requirements and assessments over the Plan period.

Furthermore, as per the NPPF para 140, *“Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”*

Thus the statement at para 1.34 of the Plan directly conflicts with NPPF para 140.

Modifications requested

- The purposes of Green Belt land, as quoted from the NPPF, and the assessed ‘high’ level of harm, to the Green Belt proposed for development at JPA2 Stakehill, are in direct conflict and contradictory. Thus *‘Exceptional Circumstances’* have not been demonstrated.
- JPA2 Stakehill should be reassessed in relation to the Five Purposes and suitability to fulfil the Plans’ Criteria or removed from the Plan.
- The Plan is in direct breach of the NPPF para 140 and should be amended accordingly by way of reassessments. This may result in substantive changes to the Plan meaning it should revert to a Regulation 18 stage plan.

Conclusion:

As set out above and within the strategic objection to the Publication Plan, the local community have significant concerns with the proposed release of Green Belt land. Residents consider that this approach has not been sufficiently justified by the Greater Manchester Combined Authority, and that insufficient consideration has been given to increasing densities of development within urban areas, and supporting developers and landowners to secure efficient and effective viable re-use of brownfield land.

Despite the assertion that a Brownfield preference approach has been taken, the GMCA instead have opted for an apparent Green Belt first strategy in meeting the needs of Greater Manchester over the plan period, contrary to the provisions set out within the Plan, and this is simply unacceptable. In addition, and as set out above, the GMCA are proposing to allocate sites which provide a strategic function within the Green Belt and whose openness should be preserved.

For the reasons laid out above, JPA2 Stakehill does not demonstrate a sustainable location for development and raise significant development control concerns including access, highways, sustainability which do not justify its allocation for development. We therefore ask that this site be deleted from the Plan.

We would ask that officers within the GMCA and local Rochdale Council, and higher authorities who will consider whether the PfE Plan is ‘sound’, pay due regard to the concerns of the local community and revisit proposals for the release of Green Belt in meeting the housing and economic needs of the local area. We believe the plan as drafted is not sufficiently justified or acceptable and will not meet the tests of soundness.

- Yours Faithfully



Gordon Tilstone, Chair, Thornham St John’s Neighbourhood Forum