

Places for Everyone Representation 2021

<b>Company / Organisation</b>	Kellen Home
<b>Person ID</b>	1287488
<b>Title</b>	Stakeholder Submission
<b>Agent Company / Organisation</b>	Harris Lamb Ltd
<b>Type</b>	Web
<b>Company / Organisation</b>	Kellen Home
<b>Person ID</b>	1287488
<b>Title</b>	JP-H 1 Scale Distribution and Phasing of New Housing Development
<b>Agent Company / Organisation</b>	Harris Lamb Ltd
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	The supply of housing is based on the number of sites identified in brownfield registers, SHLAA and Local Plans. Whilst the total number may exceed the housing need, we need to be realistic as to what can be delivered within the plan period, both in terms of the sites and the number of dwellings to be delivered on them. At the moment, a very optimistic prediction is being made about how many dwellings will be delivered on these sites, especially in the context of all the challenges that these sites present in securing their delivery. We consider that this should be reconsidered and the assumptions clearly evidenced.
<b>Company / Organisation</b>	Kellen Home
<b>Person ID</b>	1287488
<b>Title</b>	JP-H 3 Type Size and Design of New Housing
<b>Agent Company / Organisation</b>	Harris Lamb Ltd
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA

<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Policy JP-H 3 states that all new forms of residential development will be required to meet Nationally Described Space Standards (NDSS). The PPG is quite clear that the Councils need to gather evidence first to determine whether there is a need for additional standards in their area and justify setting appropriate policies in their Local Plan. What evidence has been collected that a) demonstrates that there is a need for NDSS to be applied, and b) what is the evidence to justify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. Finally, has the Combined Authority considered the implications on viability of development if it were to apply NDSS to new development? At present, we do not consider that the Combined Authority has adequately assessed whether there is evidence of the need for NDSS to be applied, let alone to what type of housing and in what proportion (there is currently no evidence presented that states that NDSS should be applied across the board) and finally, we cannot see an assessment of viability if NDSS were required.</p> <p>As it stands, we do not consider that anywhere near enough a robust justification has been presented to warrant a policy requiring compliance with NDSS and certainly not across the board on all new residential development. We would suggest that the Combined Authority revisit this and undertake the appropriate evidence gathering if they propose to continue with such a policy.</p>
<b>Company / Organisation</b>	Kellen Home
<b>Person ID</b>	1287488
<b>Title</b>	JP-H 4 Density of New Housing
<b>Agent Company / Organisation</b>	Harris Lamb Ltd
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Sound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Kellen Homes supports the identification of higher density near transport nodes and in more sustainable locations. However, it is imperative that the other policies in the plan allow for the densities identified to be achieved. For example, the provision of NDSS, cat M4(2) and M4(3), and integration of SuD features within street scenes will make dwellings larger and reduce the net density.</p>
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<b>Title</b>	JPA 20: Castleton Sidings
<b>Agent Company / Organisation</b>	Harris Lamb Ltd
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Sound
<b>Soundness - Justified?</b>	Sound
<b>Soundness - Consistent with national policy?</b>	Sound
<b>Soundness - Effective?</b>	Sound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>Kellen Homes support the allocation of the site and the role it will play in the delivery of housing and the ELR line extension. They are currently in the process of preparing a planning application, including all the detailed survey work that is required to support this. In doing so, Kellen Homes have a strong working knowledge of the site and the constraints and opportunities that it presents. In this context, Kellen Homes would like to make the following comments in relation to the criteria within JP Allocation 20:</p> <p>-Criteria 1 - Kellen Homes considers that the identification of this site delivering 125 dwellings does not make the most of this previous developed site. In preparing an application, the net developable area for the housing element has been agreed with Officers at Rochdale Council, which excludes the land required for the ELR line extension and POS at the western end of the site. The net area is 5.08 hectares, and 125 dwellings equates to a net density of just 24.6 dph. This is significantly below the 50 dph set out in Policy JP-H for areas within 800 metres of rail stations with a frequent service and even below the minimum density set in the policy of 35 dph.</p> <p>Kellen Homes consider the capacity of the site should be increased accordingly. At 50 dph this would equate to 254 dwellings. Based on the detailed layout produced by Kellen Homes we considered that the density is likely to be closer to 40 dph, which would equate to 203 dwellings.</p> <p>-Criteria 2 - Kellen Homes have no objection to the western end of the site being left underdeveloped and used for public open space. However, this is not 'half' the site and the policy wording should be amended accordingly. As public open space, this area will form a functional part of the housing site and so we question whether this should be retained as Green Belt land, which could cause confusion when the detail of a scheme is being considered. Alternatively, we consider the allocation could include a criteria that limits the use of this area to public open space / ecological enhancements.</p> <p>-Criteria 3 and 5, Paragraph 11.221 - It should be made clear that this site is required to deliver the ELR line extension, regardless of what option is pursued. This is true for not only the temporary halt, but also the new route of the line to the main line station on the opposite side of Manchester Road. Reference should also be made to the emerging Castleton Station SPD and the role the ELR line extension is expected to have as a catalyst for regeneration in the station area.</p> <p>-Criteria 7 - to our knowledge, a link to Heywood through the site is not possible. We would welcome clarification of how the Council consider this could be achieved?</p>

Kellen Homes consider this criteria should be reworded. Pedestrian links will be provided within the site to the proposed access points. Thereafter, the existing links are strong, and if shown to be necessary, could be improved through planning obligations.

-Criteria 11 - Kellen Homes have undertaken intrusive ground investigations, which confirm the site is contaminated and that infiltration is not appropriate. The drainage strategy will need to be designed accordingly and SuDs features will not be appropriate due to the risk of spreading contamination around the site. The reference to blue infrastructure should be removed accordingly.