

Places for Everyone Representation 2021

Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf PFE1287377_SiteAssessment_SouthofHyde.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Kallee-Grover

Places for Everyone Representation 2021

Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377

Places for Everyone Representation 2021

Title	Other Comments
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	JP-H 2 Affordability of New Housing
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_SiteAssessment_SouthofHyde.pdf PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	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

Places for Everyone Representation 2021

	Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	JP-G 10 Green Belt
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf PFE1287377_SiteAssessment_SouthofHyde.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	The Plan sets out an area of Green Belt release to meet the perceived housing need across the nine authorities. However, 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 insufficient 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.
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	JPA 32: South of Hyde
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_SiteAssessment_SouthofHyde.pdf PFE1287377_LeithPlanning_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound

Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The site is understood to be currently designated as Green Belt within the adopted Unitary Development Plan with a small area (1.8ha) of white land also included within the allocation adjacent to Hilda Road in order to secure access.</p> <p>In respect of the NPPF considerations, the following are relevant:</p> <p>1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness? Rating: strong</p> <p>1b - Does the parcel protect open land from the potential for urban sprawl to occur? Rating: strong</p> <p>2a - Does the parcel prevent the merging or erosion of the visual or physical gap between Neighbouring settlements? Rating: Strong</p> <p>3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Rating: Strong</p> <p>4a - Does the parcel contribute to the setting and "special character" of a historic town(s)? Rating: Weak</p> <p>The Topic Paper associated with the allocation also confirms that much of the site is designated within the Greater Manchester Joint Minerals Plan as being within the mineral safeguarding areas for brick clay and coal.</p> <p>The Pole Bank Site of Biological Importance (SBI) runs through the site and an SBI on Apethorn, in addition to two areas of Ancient Woodland and protected trees along the boundaries.</p> <p>The site is noted to be described as being primarily vacant greenfield in use for grazing with a number of built structures and development within the site edge including residential properties on Apethorn Lane, a recent Countryside Properties residential development at Broadmeadow Drive and assisted living accommodation at Pole bank Hall. A motor sales garage and a number of farm complexes including the Grade II* listed Apethorn Farmhouse.</p> <p>The list of structures referred to above however does not give a true reflection of vacant, greenfield and rural character of this proposed allocation.</p> <p>Ground Conditions - The Topic Paper associated with the proposed allocation indicates at paragraph 12.1 that the site is recorded as being of a mix of grade 3 and grade 4 agricultural land. It is understood that the majority of the site is grade 3b meaning it is not included within the best and most versatile. Confirmation is sought in relation what level of independent assessment has been undertaken on this report and whether DERFA agree with the report conclusions as a large area of both sites is classified as urban notwithstanding that the Apethorn and Bowlacre sites have not been building on within the allocation areas (it is recommended that GM Mapping is reviewed in this regard).</p> <p>The site is within a coal development low risk area and parts of the site are identified as mineral safeguarding areas for brick clay and coal. Given the national and international shortages in building supplies clarification is sought that there is no need to retain access in the longer term to these mineral</p>

assets. It would appear that developing over such assets could well be inappropriate and unsound.

Two small areas of landfill are adjacent to but outside of the allocation boundary, albeit leaching from this historic use and impact on safety of ground water etc within the allocation still need to be carefully addressed.

There are also noted to be ground fuel storage tanks at a number of adjacent uses on Stockport road and the potential for remediation and contamination from such developments also needs to be assessed and addressed prior to allocating the site for development. Leaving such questions and the need for preliminary assessments simply to be addressed within any future application on site, is deemed wholly unacceptable.

Flood Risk and Drainage - Section 11 of the Topic Paper addresses the matter of flood risk and confirms that within the Level 1 SFRA that other land parcels were identified as being more vulnerable. In fact at paragraph 11.4 the Topic Paper advises that 9% of the site could be subject to a flood depth of an average of 40mm and as such development should be focused on the areas within flood zone 1 with other management and controls required. With the site only being developable with mitigation measures. Given the need to focus development in areas at lower risk from flooding we do not accept that sufficient safeguards have been provided at this stage to justify allocating the site for development within the Plan. It is recommended that an updated assessment is undertaken as the existing flood risk data is considered outdated and not representative of the true baseline.

Local residents have made a video of the flooding experienced within the area which can be viewed here:

https://www.youtube.com/watch?v=vMIWwmxL_Pc&t=485s

The extent of built development being proposed also raises concern in relation to the potential for future surface water flooding in the local area and any associated impact on the neighbouring areas and safe access and egress within the development. The justification to release this site for development is simply not justified to (1) secure the release of this Green Belt site and (2) to justify developing a vulnerable use in an area at risk from flooding without clarity on safeguards and mitigation. New properties already building in the surrounding area, in particular along Broadmeadow Drive, have experienced flooding notwithstanding purported mitigation measures having been implemented.

The risk to the safety of ground water from disturbing former landfill and potential contamination on neighbouring sites is also clearly of concern.

Transport - It is understood that access to the site could be secured from the A560 Stockport Road. This will significantly increase traffic in and around an already busy A560 and could lead to increased congestion, and impact on the highway network and highway safety given the gross scale of development being proposed. When factoring the scale and nature of other proposed allocations in the local area the cumulative impact on the highway network will be significant. No allocation for new development should be made without at least a baseline assessment of capacity/additional users having been undertaken.

The fact that paragraph 10.11 of the Topic Paper confirms that a number of motorway junctions in the local area were identified as nearing or exceeding operational capacity which has been accepted to worsen as a result of this allocation, the impacts on the highway network cannot be understated and do not currently justify the proposed allocation. The proposed transport mitigation options are not deemed to be sufficient to address the concerns of residents in relation to this proposed allocation either in isolation or in relation to the cumulative impacts from other proposed allocations in this local area.

The following quote from the background papers is extremely telling in respect of the significance of the existing problems, to exacerbate these would be irresponsible and a risk to highway safety:

"The morning and afternoon peak traffic periods on the A560 extend for about two hours. The morning peak commencing at around 6.30am and finishing at 8.30am. Through the morning and in the afternoon until the PM builds up, the traffic is more free flowing but there are extended periods when the traffic flow is heavy and slow. During the morning peak traffic period, the west bound traffic on the A560 is continuous and unrelenting. Traffic moves very slowly at about 2mph in a continuous nose to tail queue".

The Topic Paper indicates that the site is well located for access to sustainable modes of travel. However, it is noted at paragraph 10.7 that further improvements in bus services along the A560 would be of benefit. Given the scale of development being proposed it is important that issues such as access to services, facilities and public transport are at the forefront of the decision making process, and as it stands there are too many unknowns in relation to public transport provision and general improvements to justify this allocation. Access to services etc on foot is a particular concern. Woodley can only accommodate approximately 6 cars on the station car park, with parked vehicles often causing congestion on surrounding roads. The trainline itself is not electrified and as such can only accommodate diesel trains □ it is unlikely that the proposals would provide sufficient planning gain to enable an upgrade to this facility.

Utilities - The localised issues with water distribution and sewerage raises significant concern in relation to the potential for environmental impacts on ground water and surface water flooding and the capacity of existing infrastructure to accommodate development of this scale. Existing waste water is pumped uphill and there is insufficient infrastructure to accommodate a further 440 homes.

Environmental - Paragraph 14.1 of the Topic Paper confirms that this allocation will lead to the loss of 32.35 hectares of Green Belt land. It is noted that the Stage 1 Green Belt Assessment evaluated that the site plays a strong role in checking the unrestricted sprawl between Gee Cross, Greave and Woodley, plays a strong role in preventing the neighbouring settlements of Hyde, Woodley and Romiley from merging into one another, play a strong role in safeguarding the countryside from encroachment and plays a weak role in preserving the setting and special character of historic towns. The important role therefore that these sites play in relation to the purposes of the Green belt simply cannot be understated. Paragraph 14.4 states that the parcel contributes strongly to the sense of openness and plays a strong role in checking the unrestricted sprawl of Gee Cross, Greave and Woodley and in inhibiting ribbon development along internal and bordering roads.

The parcel is understood to play a critical role in preventing the physical coalescence and perception of merging of Hyde and Woodley □ these settlements are only 400m apart and it is imperative to be able to maintain this separation if the area is not to become completely urbanised. The proposed release of greenbelt would take the boundary between the southwest side of the Apethorn site with Woodley to within 15m (tameside"s stated protection distance)

The stage 2 assessment confirmed that the overall harm from the release of this site from the Green Belt would be moderate-high constituting significant sprawl and encroachment into the countryside. The case for special circumstances simply does not override or outweigh the harm resultant from this proposed allocation, and the national policy presumption against its release. The need for mitigation to secure a more defensible boundary only heightens the fact that this is not the right site to be being brought forward for development.

It is noted that the allocation is within the Urban Fringe Valleys landscape character type, transitioning into the Pennine Foothills (dark Peak) landscape character type to the east. and that the careful siting of development and tree planting will be required to ensure that the land and visual impact of the new development is appropriately considered and minimised. The fact that the site is visible from a significant number of vantage points also needs to be duly considered and as it stands there is insufficient demonstration that landscape character and visual amenity can be protected.

The site is greenfield and on the boundary of ancient woodland. The topic paper indicates that there are no known ecological constraints which are so important as to preclude the allocation of the site, although mitigation or compensation will be required. However, the site includes a Site of Biological Importance, is adjacent to a nature reserve and ancient woodland, and a number of protected species and potential specially-protected priority species have been identified. Therefore, the conclusion that there are no ecological impacts sufficient to negate the allocation of the

site on the basis of the evidence as put forward is simply incoherent and will not pass the tests of soundness.

Given the proximity of the railway and the A560 there are also concerns in relation to the impact from air pollution and noise in relation to the proposed end users of the new development, and on the increase in noise and air pollution in the local area from the scale of development now being proposed. The impact of development on health of existing and future residents is a significant issue that needs to be carefully considered prior to allocating this site for development, especially in light of the Council acknowledging the state of climate emergency.

Historic Environment - It is understood that the archaeological resource of the site is largely unknown but there is potential for remains of high local/regional importance.

It is noted that within the allocation is an at risk grade II* listed building, namely the Apethorn Farm complex. Whilst our clients would be supportive of the reuse of this building and the case for enabling development, to secure an allocation of this scale simply to secure the future of this heritage asset would appear unreasonable and disproportionate. This is heightened by the fact that consent was granted again in 2017 for the renovation and conversion of the farmhouse etc, the third time permission had been granted, and without the requirement for the significant scale of development proposed pursuant to this allocation within the wider local area. Additionally, the setting of a heritage asset of such significance would surely be detrimentally affected by the scale of development anticipated within the allocation.

It is noted that there are a number of other designated heritage assets in the local area and a number of non-designated heritage assets within the allocation boundary, and there are concerns that the harm on the historic environment has not been sufficiently evaluated at this stage in the Plan process to robustly justify a sound evidence base and allocation of the site.

Social - The Topic Paper sets out the existing issues with job opportunities skills, training, productivity and poor health outcomes in the local area. These issues could well be addressed through investment and development in the local area and by investing and generating areas and existing previously developed sites, without being used as case to justify removal of a site from the Green Belt.

Our clients also do not accept that the development will not lead to future pressures on existing services within the local area. A development of this scale would not be able to secure sufficient planning gain to facilitate the required improvements to local services and facilities needed by the existing local population and would certainly not be sufficient to then facilitate the pressure on those services and facilities that the extra population would

bring. There is already a need for more school places, better highway and rail infrastructure, GP and hospital facilities, and social care.

Additional homes will only add to this existing under provision. When issues such as the potential for enhancement to heritage assets, ecological areas, and ground conditions are factored in, it is impossible to see how there could be any viable return for a developer without putting pressure on further Green Belt release.

Requirements to overcome constraints - Pressure on existing environment and infrastructure may require the site developer to make contributions to public services, albeit the scale and nature of such contributions will be determined at a later date and the local community will have no say on what they would entail or the scale of contribution being proposed to support their community. It is likely that the scale of contributions required by the development would put pressure on the Local Authority to grant permission for more development than currently anticipate or fail in providing for the service and facilities that are already required, thereby exacerbating the existing problems.

Planning History - Appendix 7 of the Topic Paper is noted to detail the planning history associated with the site including applications for the car showroom and previous applications for residential development and renovation of the farmhouse. However none are deemed to be of sufficient scale to be used in support of the release of this large Green Belt parcel.

Deliverability - Paragraph 25.1 of the Topic Paper confirms the site to be viable taking account of transport mitigation measures and requirements of the policy, including green infrastructure. However, at this stage without clarification on the site area to be given the potential impact of historic landfill and other environmental site constraints including the potential loss of protected species and habitat, and the areas safeguarded for mineral extraction there are concerns that such a conclusion has been incorrectly confirmed.

As set out above, the reality is that development of the scale proposed would not be viable when factoring in all the anticipated remediation and planning gain, the result of which would likely be pressure for additional Green Belt release or development which exacerbates existing service and facility problems.

The site subject of this proposed allocation is noted to result in significant harm to the Green Belt.

There are concerns in relation to the impact of increased traffic in the local area in relation to congestion, highway safety, air quality, pollution, noise etc.

The site has historic land uses on adjacent sites which could undermine the safety of any associated future built development in relation to contamination and remediation and is an issue which has thus far not been sufficiently addressed.

The allocation has been shown within the GMCA's own evidence to result in detrimental impacts on ecological networks and there remain concerns in relation to the robustness of the conclusions on viability given the numerous technical and safety issues associated with the development of the site which could impact on the delivery of the site.

Residents remain concerned that this allocation represents a gross scale of development wholly unacceptable to be accommodated within the local area, and will result in significant detrimental impact on the local environment including on ecological networks and the potential for surface water flooding given drainage issues in the local area and the extent of built development being proposed.

	<p>The impact on the historic environment is also of concern and the renovation of listed structures simply does not justify such a significant release of Green Belt where there has been shown to be resultant harm.</p> <p>It is our view that as it stands the GMCA have failed to robustly justify the allocation of this site, with serious questions outstanding that need to be addressed before the Plan and this allocation in particular can be found to be sound.</p> <p>To date there have been no amendments to the proposed Green Belt release in this location notwithstanding significant objection. Schools are at capacity, highway infrastructure is barely able to cope with existing demands, and the anticipated impacts on the environment are unacceptable. There is a real and demonstrable likelihood that any development allowed on the land proposed to be released from Green Belt in this location would only lead to further pressure down the line for additional development and in releasing an area so substantially larger than required there would likely be no way for anyone to prevent it. NPPF requires that Green Belt boundaries only be altered where exceptional circumstances are evidenced and fully justified <input type="checkbox"/> this has not been done to date and the reasonable alternatives have not been given due consideration.</p> <p>Additionally, the Secretary of State had stated that "the housing figure is not a target. Local authorities should make a realistic assessment of the number of homes their communities need using the standard method as a starting point". It has not been demonstrated that this has been done and therefore the figures proposed cannot be justified.</p>
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Supporting Evidence
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf PFE1287377_SiteAssessment_SouthofHyde.pdf
Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	Stakeholder Submission

Places for Everyone Representation 2021

Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_SiteAssessment_SouthofHyde.pdf PFE1287377_LeithPlanning_Redacted.pdf
Family Name	Kallee-Grover
Given Name	Paul
Company / Organisation	Save Greater Manchesters Green Belt (SGMGB) Save Apethorn and Bowlacre
Person ID	1287377
Title	JP-H 1 Scale Distribution and Phasing of New Housing Development
Agent Company / Organisation	Leith Planning Ltd
Type	Web
Include files	PFE1287377_LeithPlanning_Redacted.pdf PFE1287377_SiteAssessment_SouthofHyde.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to over provide 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. 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.