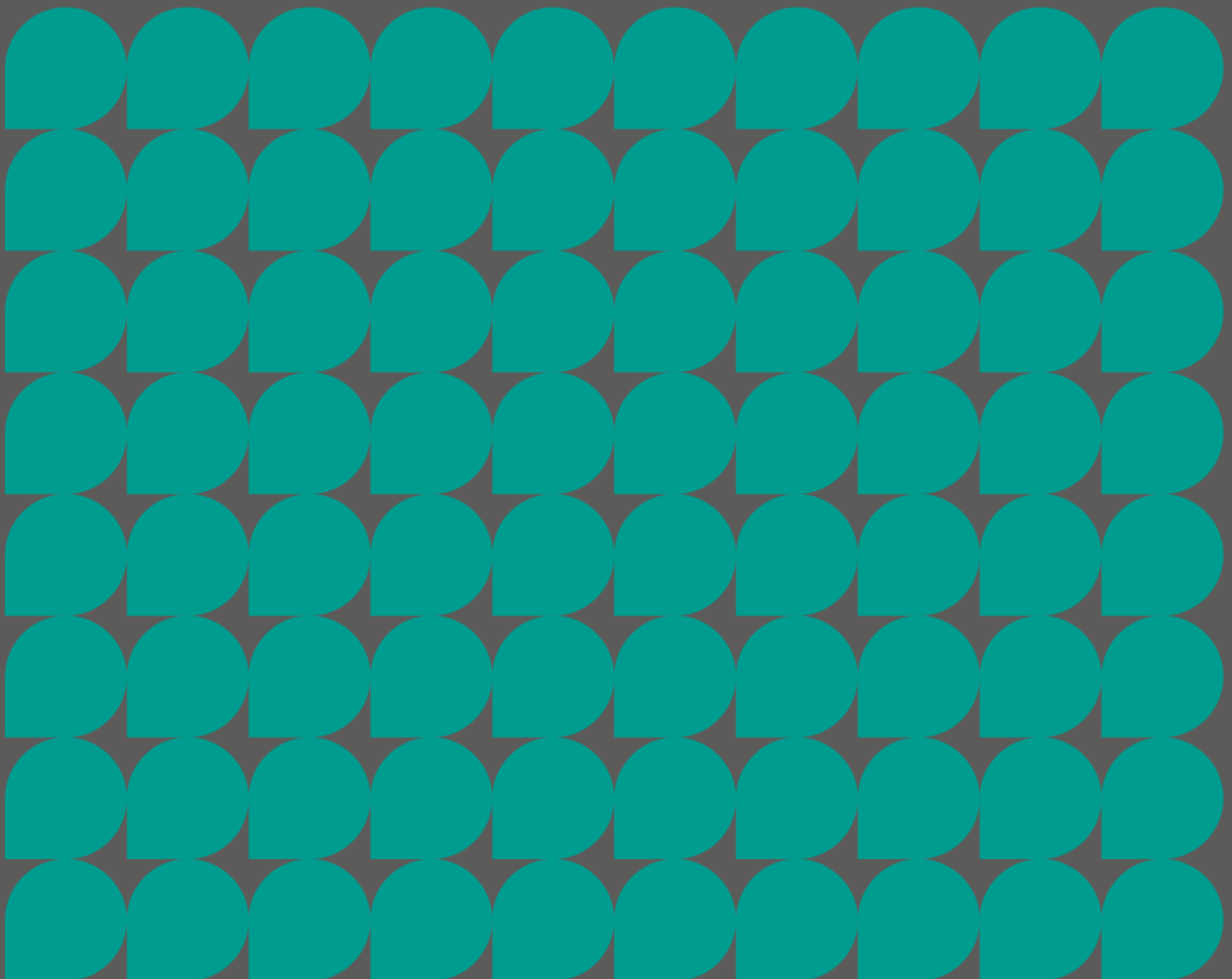


Places for Everyone

JPA15 Chew Brook Vale (Robert Fletchers) Allocation

Topic Paper

July 2021



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Section A – Background

1.0 Introduction

- 1.1 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”) and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.
- 1.2 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.
- 1.3 On 30 October 2020 the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.
- 1.4 At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.
- 1.5 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.
- 1.6 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained. Consequently, at its meeting on the 11th December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each

district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.

- 1.7 Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has ‘substantially the same effect’ on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.
- 1.8 In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan is proceeding directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 1.9 Four consultations took place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.
- 1.10 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.
- 1.11 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed

to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

- 1.12 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. Given the basis on which the Plan has been prepared, this evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. That said, this evidence base has been reviewed and updated in the light of the change from GMSF 2020 to the PfE 2021 and, where appropriate, addendum reports have been produced and should be read in conjunction with evidence base made available in October 2020. The evidence documents which have informed the plan are available via the GMCA's website.
- 1.13 PfE2021 and all supporting documents referred to within this topic paper can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>).

2.0 Allocation JP 15 Chew Brook Vale (Robert Fletchers) Overview

- 2.2 Chew Brook Vale (Robert Fletchers) site allocation is within Greenfield and is a gateway location to the Peak District National Park. The allocation comprises Fletchers Mill (Greenfield Mill) and aims to deliver a mixed-use development consisting of housing as well as commercial, leisure and retail facilities that support tourism and recreational uses. It is previously developed (brownfield) land in the Green Belt.
- 2.3 Previous versions of the site allocation had included land that lies to the west of Fletchers Mill but this has been removed from the allocation proposed in PfE 2021 due to an effort to reduce the land being removed from the Green Belt and maximise the reuse of brownfield land.
- 2.4 The allocation represents a unique opportunity for complementary tourism and leisure development to enhance visitor and destination offer within the sub region.

However, this must be done in a sensitive way to its setting and its duty to care for the Peak District National Park under Section 62(2) of the Environment Act.

- 2.5 Due to the scenic location of the site, it is an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. There is also a need for affordable homes across the Saddleworth villages as many residents who wish to remain living within the area cannot currently afford to do so. The site therefore provides the potential to provide high-quality family and executive homes, as well as affordable homes, in an attractive, desirable location, enhancing Oldham's housing offer and contributing towards local housing needs. Helping to deliver the vision, plan objectives and spatial strategy of PFE 2021.
- 2.6 In the 2019 Draft GMSF the Chew Brook Vale proposed strategic allocation was allocation number GM-18 and called Robert Fletcher's. In GMSF 2020 the allocation number was GM-11 and renamed Chew Brook Vale (Robert Fletchers). In PFE 2021 the allocation number is Policy JP Allocation 15 (no name change) and will be referred to as such within this topic paper.

3.0 Site Details

- 3.1 The site falls within the Green Belt. It includes the redundant Robert Fletchers mill complex (Greenfield Mill). The mill complex is previously developed land and a saved 'Major developed site in the Green Belt' Unitary Development Plan (UDP) allocation within the current Oldham Local Plan.
- 3.2 The allocation is within Greenfield in the Saddleworth South ward and sits adjacent to Dove Stone Reservoir and the Peak District National Park.
- 3.3 The site area is 5.38 hectares, with a gross developable area of approximately 2.74 hectares and net developable area of approximately 2.19 hectares when the areas at risk of flooding are removed (see section 11). The site is 100% brownfield land and has one landowner.

- 3.4 The site sits at the bottom of the Chew Valley with steep hills to the north and south. Chew Brook runs along the northern boundary of the site and there are two former mill ponds within the site that would require remediation prior to any development.
- 3.5 A map of the site as it is currently designated in PfE 2021 is provided in Appendix 1.

4.0 Proposed Development

- 4.1 The site proposes a range of uses. This includes commercial, leisure and retail facilities to support tourism and leisure facilities of up to 6,000sqm as well as around 90 new homes delivering a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms.
- 4.2 Based on the net developable area and proposed capacity, density across the site will be around 41 dwellings per hectare. The delivery of housing is to be based on local needs and evidence.
- 4.3 The type and range of housing, including affordable, will be delivered in line with local planning policy requirements contained in the current Local Plan (the Joint Core Strategy and Development Management Policies Development Plan Document, adopted November 2011):
- Policy 3 sets out the policy for the distribution and release of housing land;
 - Policy 10 sets out the affordable housing policy, which now applies to all residential developments of 10 homes and above in line with National Planning Policy Framework (NPPF); and
 - Policy 11 sets out that all residential developments must deliver a mix of appropriate housing types, sizes and tenures that meet the needs and demands of the borough's urban and rural communities based on local evidence.
- 4.4 With regards to 'local evidence' Oldham Council has recently completed a Local Housing Needs Assessment (LHNA) to inform the council's Housing Strategy and review of the Local Plan. The LHNA suggests a split of 30% affordable housing and 70% market housing. It identifies a need for three and four or more-bedroom houses given the pressures on larger family housing and a marked shift in aspirations for

smaller flats and bungalows reflecting an ageing population and identified need for older persons' specialist accommodation. In terms of affordable housing provision, the LHNA suggests an affordable tenure split of 50% social affordable rented and 50% intermediate tenure. A broad housing mix of 16.7% one-bedroom, 48.7% two-bedroom, 29.6% three-bedroom and 5% four or more-bedroom dwellings is suggested. In terms of affordable housing provision, the LHNA suggests an affordable tenure split of 50% social/ affordable rented and 50% intermediate tenure. A broad housing mix of 16.7% one-bedroom, 48.7% two-bedroom, 29.6% three-bedroom and 5% four or more-bedroom dwellings, is suggested.

- 4.5 The housing policies within the Local Plan will be reviewed as part of the emerging Local Plan Review.
- 4.6 Development will need to provide for a improved new access point to the site off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standard. The high-level indicative concept plan presented access arrangements as part of delivery of the wider allocation which are still of relevance in terms of how access may be gained to the revised boundary. However, further work at masterplanning / planning application stage will be required. Any proposals will need to be agreed by the local highway authority and to adoptable standards.
- 4.7 Any development will also need to take into account of and deliver any other highway improvements needed so as to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site.
- 4.8 Alongside the above development will be required to:
 - Deliver multi-functional green infrastructure and high-quality landscaping to minimise the visual impact of any development proposed, provide links within, and to and from, the site and ensure areas of biodiversity within the site are retained and enhanced to deliver a clear and measurable net gain.
 - Provide for new and / or improved open space as well as contributing towards the provision of appropriate education, health and community facilities to ensure that

the increased demand that will be placed on existing provision by the proposed development is met.

- Policy JP Allocation 15 also sets out the need to retain and enhance the hierarchy of biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment.
- Have regard to the findings of the Stage 2 GM Green Belt Study, including mitigation measures needed to mitigate harm to the Green Belt, and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt, as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.
- Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020) and addendum (2021).
- Have a comprehensive drainage strategy for the site that includes details of how surface water will be managed throughout the site including the exploration of opportunities to use natural flood management and Sustainable Urban Drainage.

- 4.9 The full policy wording for Policy JP Allocation 17 as proposed in PfE 2021 can be found at Appendix 1.
- 4.10 A high-level indicative concept plan has been prepared by IBI, on behalf of the council to support the allocation and inform consultation (this can be found at Appendix 2). It is based on the boundary as proposed in GMSF 2019 and GMSF 2020. Since preparation of the concept plan the site boundary has reduced to remove land to the west between the mill complex and Greenfield. Nevertheless, it is still considered to be of relevance in terms of illustrating how the site may come forward, potential access points and links to the surrounding countryside. A more detailed masterplan, reflecting the revised boundary, and in conjunction with a future developer's planning application will need to be prepared. Reflecting this, Policy JP Allocation 15 requires that any development will need to be in accordance with a comprehensive masterplan and design code for the site agreed by the local planning authority.

4.11 The main changes made to Policy JP Allocation 15 between GMSF 2019, GMSF 2020 and PfE 2021 relate to:

- A reduction in capacity from 170 homes to around 90 homes. This is due the change in site boundary but also site constraints relating to risk of flooding.
- Prior to the change in PfE 2021 it was found that development on plots A, B and C of the high-level indicative concept plan were not suitable for development due to the findings of further detailed flood risk work undertaken as part of the Greater Manchester Level 2 Strategic Flood Risk Assessment (SFRA), which identified the land as functional flood plain. In GMSF 2020 this led to removal of the extension to Waterside Mill employment area in Policy GM-11. At this stage the quantum of housing proposed remained the same as proposed in the 2019 GMSF (around 170 homes).
- In the previous 2020 draft plan the reasoned justification to the allocation explained that aspirations for the eastern section of the site included 10 – 15 pods, a boutique hotel and a visitor education centre to be brought forward in line with national planning policy for appropriate development in the Green Belt. It also set out that opportunities for the sustainable re-use and enhancement of Greenfield House (which also falls within the eastern section) should be explored. However, now that the site boundary has been tightened to just the mill complex it is not felt appropriate to include this policy wording.
- The previous 2019 and 2020 allocation included a strategic area of Green Belt in the eastern half of the site to be retained to maintain separation between the development area and Dove Stones Reservoir and the Peak District National Park. This is now not included within the revised site allocation. This land will remain as Green Belt outside of the site boundary.

4.12 The changes made to Policy JP Allocation 15 between GMSF 2019, GMSF Publication Plan: Draft for Approval (October 2020) and PfE 2021 are set out in Appendices 3 and 4.

4.12 The previous draft policy wording and boundary as proposed in GMSF 2019 can be found at Appendix 5 and as proposed in the GMSF 2020 at Appendix 6.

- 4.13 In terms of the changes between the 2020 GMSF and the 2021 PfE, as these changes were either minor or as a result of Stockport's withdrawal from the plan, it is concluded that the effect of the plan is substantially the same on the districts as the 2020 version of the policy.

5.0 Site Selection

- 5.1 To identify potential development sites for allocation a Site Selection methodology was developed to inform the Draft GMSF 2019. The methodology includes four stages and seven site selection criteria, informed by the Vision, Objectives and Spatial Strategy in the GMSF 2019.
- 5.2 Full details of the site selection process and sites considered can be found in the Site Selection Background Paper.
- 5.3 A Call for Sites exercise to identify available land was launched across Greater Manchester in 2015 to inform the first draft GMSF in 2016. Call for Sites were also submitted in response to the first GMSF consultation in Spring 2016 and Summer 2016. Several sites within and surrounding the Chew Brook Vale allocation were submitted as Call for Sites and/or to Oldham Council.
- 5.4 Areas of Search were identified where any identified site including the Call for Sites and proposed allocations within the GMSF 2016, met one or more of the Site Selection Criteria. They were identified using the Site Selection Criteria Maps produced for each borough of Greater Manchester. Chew Brook Vale (Robert Fletchers) falls within the Area of Search OL-AS-10. Details of these sites can be found in the Site Selection Background Paper and in Appendix 7 to this topic paper, where there is also a justification as to why they were not considered suitable for allocation.
- 5.5 Areas of Search were identified where any identified site, including the Call for Sites and proposed allocations within the Draft GMSF 2016, met one or more of the Site

Selection Criteria. They were identified using the Site Selection Criteria Maps produced for each borough of Greater Manchester. Chew Brook Vale falls within the Area of Search OL-AS-10.

- 5.6 The site selection paper identifies OL-AS-10 meets the site selection criteria of:
- **Criterion 1** - Land which has been previously developed and/or land which is well served by public transport; and
 - **Criterion 7** – Land that would deliver significant local benefits by addressing a major local problem / issue.
- 5.7 Criterion 1 identifies those areas of previously developed land as well as the most sustainable and accessible locations which are already served by public transport. The criterion meets the PfE objectives to prioritise the use of brownfield land and it is also directly referenced in the NPPF (2018) paragraph 138 which states, “where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport.” The site, which now relates to the Robert Fletchers mill complex only, is considered to meet criterion 1 as it is 100% previously developed land in the Green Belt.
- 5.8 Criterion 7 links to sites which can demonstrate direct link(s) to addressing a specific local need. To meet this criterion a site would be required to bring benefits across a wider area than the development itself and/or would bring benefits to existing communities. The site is considered to meet criterion 7 as it would provide a deliverable site for housing in the north of Greater Manchester (GM) where there is an opportunity to capitalise on an existing high end housing market area and / or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north.
- 5.9 In addition the above the site also offers a unique opportunity to create an exemplar visitor destination at the gateway to the Peak District National Park providing commercial, leisure and retail facilities of up to 6,000sqm contributing to employment opportunities.

- 5.10 Following their identification, the sites within the Areas of Search were subject to a planning constraints assessment, which included an assessment of flood risk, ecology, landscape, heritage, social infrastructure etc. See the Site Selection Background Paper for further details regarding the Call for Site Assessment.
- 5.11 In terms of the PfE Spatial Strategy and Strategic Objectives, Chew Brook Vale (Robert Fletchers) is capable of delivering around 90 houses, with a mix of dwelling types and sizes to diversify the housing stock and meet local needs in a unique location. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.
- 5.12 For more information on the site selection process go to the Site Selection Background Paper

6.0 Planning History

- 6.1 There are no relevant planning applications to the site.
- 6.2 The site is a UDP policy that was saved as part of preparing the current Oldham Joint Core Strategy and Development Management Development Plan Document - 'OE1.8 – Major Developed Site in the Green Belt'.
- 6.3 Saved UDP Policy OE1.8 states that proposals for the comprehensive redevelopment of this site will be permitted, provided that they will:
- a. be for a mix of uses that includes employment-generating uses (B1 and/or B2), and tourism or leisure uses appropriate to the location; and
 - b. have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less; and
 - c. contribute to the achievement of the objectives for the use of land in Green Belts; and

- d. not exceed the height of the existing buildings; and
- e. not occupy a larger area of the site than the existing buildings, unless this would achieve a reduction in height which would benefit visual amenity; and
- f. deliver environmental improvement.

6.3 Saved UDP Policy OE1.8 also states that the council may permit a limited number of live/work units to be included in the mix of uses where it is satisfied that this is necessary to deliver a mixed scheme. The live/work units and other elements of the site should be developed broadly in tandem in accordance with a phasing scheme to be agreed with the council. This is in order to guarantee the delivery of non-residential uses. Office development that generates significant numbers of trips must comply with the locational criteria in Policy B1.4 a) in the Business, Industry and the Local Economy Chapter of the Core Strategy.

6.4 Full details of the saved UDP policy and Core Strategy can be found at https://www.oldham.gov.uk/info/200709/documents_in_the_local_development_framework/978/adoption_of_joint_core_strategy_and_development_management_policies_development_plan_documents_dpds.

7.0 **GMSF 2019 Consultation Responses**

- 7.1 A summary of the GMSF 2019 consultation response to Chew Brook Vale (Robert Fletchers) is set out below. Further details can be found in the Statement of Consultation.
- 7.2 The comments summarised within this section relate to Chew Brook Vale (Robert Fletchers) as it appeared in the GMSF 2020 and the larger site with a capacity for around 170 homes.
- 7.3 The allocation received 318 comments from organisations and members of the public during the 2019 GMSF consultation.

- 7.4 It was felt that this allocation is located in some of the highest quality of Green Belt in the region and that the proposed development does not provide a buffer between the edge of Greenfield and the Peak District National Park as well as taking away farm land. It was suggested that the land remaining as Green Belt should be excluded from the allocation.
- 7.5 With regards to housing, the number of homes proposed is objected to and it was felt that homes should not be executive but that they should be affordable housing for local people. The phasing of development should be clear and defined in the plan with the mill site being developed first with a mix of uses.
- 7.6 There were concerns regarding congestion and traffic in Greenfield, particularly Chew Valley Road and the A635 as these are busy roads. Linked to this were concerns regarding air quality and climate change. Chew Valley Road is unable to be widened. Car parking around Greenfield Station and Dove Stones Reservoir is an issue, along with the ability of emergency vehicles to access the reservoir.
- 7.7 It was considered that access needed to be reviewed, as the existing proposals were too intrusive. It was also considered that public transport did not serve the area well.
- 7.8 There was concern that the character of the area would be negatively impacted with the scale of development and that this could have an implication on tourism as people visit Dove Stones because of its beauty, which development may affect. There are also concerns relating to anti-social behaviour issues at Dove Stones, which development is feared may exasperate.
- 7.9 There were also concerns regarding the impact on ecology, with many species mentioned and green infrastructure, including the loss of mature trees.
- 7.10 Concerns were expressed regarding flood risk, particularly surface water flood risk.
- 7.11 Some representations were made to say that holiday lodges should not be included in a strategic policy.

- 7.12 There were concerns over social infrastructure capacity such as schools and health care provision.
- 7.13 It was felt that the site name ‘Robert Fletcher’s’ was misleading and the site in the 2019 GMSF was now much larger than the Robert Fletchers site that was initially the site allocation proposed.
- 7.14 There were also representations expressing support such as supporting the principle of the allocation in general, supporting a hotel, visitor centre and the redevelopment of the Robert Fletchers mill site.

8.0 GMSF 2019 Integrated Assessment

- 8.1 The GMCA commissioned ARUP to complete an Integrated Assessment (IA) of the first and second draft of the GMSF and PfE 2021.
- 8.2 The IA is a key component of the evidence base, ensuring that sustainability, environmental quality and health issues are addressed during its preparation. The Integrated Assessment combines the requirements and processes of:
- **Sustainability Appraisal (SA)**: mandatory under section 19 (5) of the Planning and Compulsory Purchase Act 2004.
 - **Strategic Environmental Assessment (SEA)**: mandatory under the Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose the European Directive 2001/42/EC into English law).
 - **Equality Impact Assessment (EqIA)**: required to be undertaken for plans, policies and strategies by the Equality Act 2010.
 - **Health Impact Assessment (HIA)**: there is no statutory requirement to undertake HIA, however it has been included to add value and depth to the assessment process.
- 8.3 The IA carries out an assessment of the draft policies by testing the potential impacts and consideration of alternatives against the plans objectives and policies. This ensures that any potential impacts on the aim of achieving sustainable development considered and that adequate mitigation and monitoring mechanisms are

implemented. It does this through an iterative assessment, which reviews the draft policies and the discrete site allocations against the IA framework.

8.4 Stakeholder consultation is a significant part of the IA. Comments have been sought on, and informed the preparation of, previous iterations of the IA as part of developing GMSF and PfE 2021. A summary of the 2019 consultation feedback relevant to the 2020 IA and response to those comments is included in Appendix A of the 2020 IA report.

8.5 As well as the thematic policies, each allocation policy was assessed against the IA framework. To determine levels of effect when scoring the policies against the strategic objectives of the plan IA framework, the following assessment key is used:

Table One: IA Scoring

++	Very positive effect
+	Positive effect
?	Uncertain
-	Negative effect
--	Very negative effect
O	Neutral/ no effect

8.6 Combined symbols are sometimes used in the assessment (e.g. '+/ ?' or '- / ?'). Where this occurs, it is because there is a strong likelihood of positive/negative effects but that there is insufficient information to achieve certainty at this stage. Alternatively, there may be a combination of positive or negative effects, depending on how the option under consideration is eventually delivered.

8.7 The key outcomes of the 2019 IA on the Chew Brook Vale (Robert Fletchers) allocation policy in GMSF 2019 have been considered to inform the production of the revised Policy JP Allocation 15. This has been reassessed in the 2020 IA. Appendix

D of the 2020 IA provides the assessment tables for each allocation policy. It includes the assessment from 2019 including mitigation proposed, commentary on changes since 2019 and how this responds to the recommendations. Finally, it details any residual recommendations.

8.8 It is important to note that the IA was focusing on each policy in isolation from other policies in the Plan and that many of the recommended changes for the allocation policy are already covered in other policies in the Plan. However, some changes have been made to the allocation policy as a result of the 2019 IA and the policy has been reassessed in the 2020 IA.

9.0 **GMSF 2020 Integrated Assessment**

9.1 As in the 2019 IA, Chew Brook Vale (Robert Fletchers) (as proposed in the GMSF 2020) generally performed positively against the strategic objectives of the plan, with some changes made to scores from since the 2019 IA from neutral to very positive in relation to energy efficiency and resilience of housing stock; positive to very positive in relation to supporting healthier lifestyles; very positive / negative to very positive in relation to green infrastructure and opportunities for recreation, amenity and tranquillity.

9.2 The site scored very positive either fully or partly against Objective 1 'Provide a sustainable supply of housing land'; Objective 2 'Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation'; Objective 3 'Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development'; Objective 6 'Support improved health and wellbeing of the population and reduce health inequalities'; Objective 7 'Ensure access to and provision of appropriate social infrastructure'; Objective 8 'Support improved educational attainment and skill levels for all'; Objective 9 'Promote sustainable modes of transport'; Objective 11 'Conserve and enhance biodiversity, green infrastructure and geodiversity assets'; and Objective 15 'Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM'.

- 9.3 However, Objective 11 also has a mixed score of 'very positive/ negative' in relation to Objective 11 too, due to habitats being present and proximity to nature designations and the need for further ecology surveys to inform planning applications. The HRA has confirmed that a site specific HRA is not required.
- 9.4 There are also positive / negative scores against Objective 17 'Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment needs of GM, whilst reducing land contamination' as the allocation includes a mixture of previously developed and greenfield.
- 9.5 No further residual recommendations from the IA are made specifically for the allocation policy as it was considered that when the framework is read as a whole on IA Objectives are addressed. Therefore, no further changes were made to Chew Brook Vale in response to the IA.
- 9.6 An updated IA has been prepared to reflect changes made to strategic allocations since GMSF 2020. Details of the updated IA in relation to Chew Brook Vale (Robert Fletchers) following the changes that have been made to the allocation are set out below.
- 9.7 The PfE 2021 IA Update concludes that the changes to the policy made in PfE 2021 for Chew Brook Vale (Robert Fletchers) are 'significant' changes to policy for the purposes of the IA due to the allocation boundary amendments. This has fundamentally changed the physical character of the site allocation.
- 9.8 It is understood that there are a number of reasons for the reduction in area, which included avoiding area of floodrisk (Zone 3) and reducing land take from the Green Belt. The allocation is now all previously developed land. In addition, there were changes to the policy wording as a result of comments from Historic England.
- 9.9 These changes have resulted in a much smaller site which is not physically connected to the nearby built form of Greenfield village.
- 9.10 When assessed against the IA Framework, these changes result in a positive effect against Objectives 13 (flooding) and 16 (conserve or enhance landscape or

townscape). This is because areas of most significant flood risk were avoided and additional wording added around a development scheme being informed by Historic Environment Assessment. Due to the site being less well physically connected to Greenfield Village, this has resulted in a reduction in scoring from '++' to 'o' against Objectives 3, 7, and 9 (which relate to transport network, social infrastructure and sustainable modes of transport), due to the site's changed position in relation to the nearby Greenfield village. Whilst it is acknowledged that the policy wording recognises the need for enhancements to connectivity, stating a development should... *“Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site”*.

- 9.11 The IA recommends that mitigation includes ensuring accessibility is considered and prioritised when bringing this site forward for development in addition to ensuring transport connectivity is considered and integrated for all sustainable modes of transport.

Section B – Physical

10.0 Transport

- 10.1 TfGM commissioned Systra to complete locality assessments of each of the allocations proposed in GMSF 2019 as part of the evidence base developed in order to assess and evaluate the impact of the proposals on the transport network. These locality assessments forecast the likely level and distribution of traffic generated by each allocation and assess its impact on the transport network. Where that impact is considered significant, possible schemes to mitigate that impact have been developed, tested and costed where appropriate.
- 10.2 It is important to note that the mitigation schemes developed are intended to demonstrate only that significant transport impacts of the allocation can be appropriately ameliorated. As such they are indicative only and are not intended to act as definitive proposals for the mitigation of any allocation. Detailed proposals

would need to be developed as part of a Transport Assessment submitted as part of a planning application at a later date.

- 10.3 These Locality Assessments have been prepared within the context of the Greater Manchester Transport Strategy 2040, Five-Year Transport Delivery Plan and district's Local Implementation Plans. Within these Oldham Council and TfGM have planned improvements across Oldham which are intended to make it easier for people to travel sustainably. This includes elements of the Bee Network, a comprehensive cycling and walking network which covers all Districts within Greater Manchester. The overall delivery plan of strategic transport interventions that will support all allocations in Oldham and details of the Bee Network in Oldham can be found in the Greater Manchester Transport Strategy 2040, Five-Year Transport Delivery Plan.
- 10.4 The 2020 Locality Assessment has been prepared based on the strategic allocation as proposed in GMSF 2020. An updated locality assessment has been prepared to reflect the changes to the Chew Brook Vale (Robert Fletchers) allocation proposed in PfE 2021, details of which can be found summarised at the end of this section. For the purposes of the updated 2021 Locality Assessment a capacity of around 170 homes has still been tested and whilst the infrastructure requirements within the site will be different to those considered in the 2020 Locality Assessment, the principles regarding access into the site and connectivity to the surrounding area and countryside remain the same. The findings from both the 2020 Locality Assessment and 2021 Locality Assessment have therefore been considered below.

GMSF 2020 Locality Assessment Findings for Chew Brook Vale (Robert Fletchers)

- 10.5 Locality Assessments of the GM strategic allocations have been carried out by SYSTRA to inform the GMSF 2020. As such the assessment summary below is based on the allocation as proposed in the GMSF 2020.
- 10.6 Details regarding the process for preparing the Locality Assessments can be found in the Transport Locality Assessments – Introductory Note and Assessments - Oldham. To ensure a consistent basis for assessing traffic impacts, all sites have been assessed using traffic forecasts from the GM strategic modelling suite.

- 10.7 The locality assessments provide an insight into the combined impacts of all the proposed strategic allocations and site-specific impacts, including:
- Cumulative traffic impact(s) of the site on the transport network;
 - Testing the effectiveness of the proposed off-site local highway network mitigation measures; and
 - Providing outline costs for essential transport interventions and mitigation measures.
- 10.8 The completion of locality assessments on the proposed strategic allocations has ensured that each site has been subject to a thorough, robust and consistent evaluation of its likely contribution to transport impacts in Greater Manchester. Sites that have been selected for inclusion in the Joint DPD have been found to be suitable from a transport perspective and satisfy the requirements of NPPF in that they do not place an unacceptable impact on highway safety or severe impact on the road network. As stated above where necessary, illustrative mitigation schemes have been developed, and their effectiveness in reducing traffic impacts has been demonstrated. Those schemes which have a strategic benefit and are likely to be needed in the next five-year period have been referenced in Our Five-Year Transport Delivery Plan and form part of the Greater Manchester Improvement Plan (GMIP).
- 10.9 For some allocations it is recognised that there is further work to be done in order to develop a solution that fully mitigates the site's impact on the transport network. In these instances care has been taken to ensure that the allocation is not identified for delivery in the first five years of the Plan, to enable more work to be undertaken to ensure that the site can be delivered in a safe and sustainable manner at a later point in time. All phasing information contained in the locality assessment is indicative only and has only been used to understand the likely intervention delivery timetable.

Access arrangements

- 10.10 The access arrangement has been developed for the allocation as proposed in GMSF 2020 to illustrate that there is a practical option for site access in this location and to develop indicative cost estimations. It is assumed that a detailed design

consistent with Greater Manchester's best practice Streets for All highway design principles will be required at the more detailed planning application stage.

- 10.11 To the north and west of the allocation lies the A635 Holmfirth Road. There is limited highway infrastructure present within the allocation. There is a through access road to the Robert Fletchers mill complex and Dove Stone Reservoir and access arrangements are currently made from the A635 at a bridge across Chew Brook. The A635 Holmfirth Road and Chew Valley Road runs from the west to the north of the allocation and comprises a single-carriageway urban road with narrow footpaths, streetlighting and a 30mph speed limit at the Greenfield end, and an interurban road with narrow footpaths that gradually loses streetlighting as it leaves Greenfield, while the speed limit increases initially to 40mph, then to 50mph beyond Bank Lane.
- 10.12 The scale of residential development assessed as part of the 2020 Locality Assessment was around 171 homes, based on the wider site allocation boundary proposed in GMSF 2020.
- 10.13 The Locality Assessment identifies the need for the site to be accommodated through a new primary vehicular access was identified due to the limitations of the existing access points and internal highway network. Given the wider constraints of the allocation, the access point is proposed to be formed via a junction with A635 Manchester Road at or near its roundabout junction with Chew Valley Road. This would connect to a new spine road through the site to the redundant paper mill site.
- 10.14 As set out in the Locality Assessment a number of access proposals were considered. These included an access onto the A635 Manchester Road in the form of a new Roundabout junction located in the vicinity of the existing mini-roundabout junction with Chew Valley Road. Including the provision of a new bridge structure providing access to Waterside via a new fourth arm from the existing roundabout.
- 10.15 The Locality Assessment concludes that the issue of the steep topography and the physical and environmental constraints associated with Chew Brook, as well as the significant areas of mature woodlands surrounding the A635 are a fundamental risk to the deliverability of a suitable access strategy to the site. It cannot be satisfactorily determined whether the proposed access arrangement identified in the assessment,

or an alternative scheme, could be practically delivered based on the limited information available through the desktop-based feasibility design assessment undertaken for this Locality Assessment.

- 10.16 Further investigation, beyond the scope of the Locality Assessment, would be required, and likely to include site investigations and/or a 3-dimensional design to consider these issues and inform whether a practical solution can be found that is also deliverable. Such an investigation would need to be undertaken at the Transport Assessment stage.
- 10.17 Nevertheless, an east-west spine road has been identified as being necessary to accommodate internal movement within the site, such that it is suitable to replace the existing narrow (approximately 3.5m) tree lined lane located along the northern edge of the site. The Locality Assessment considers that this existing route would be unsuitable for levels of traffic associated with the development as proposed in GMSF 2020 and that widening may be needed. Consequently, the general arrangement for a new access road of allocation as proposed in GMSF 2020 is anticipated to follow the southern boundary of the allocation between Waterside in the west and Dove Stone Reservoir to the east, providing access to the constituent parts of the development. No detailed alignment for this route has been developed.

Multi-modal accessibility

- 10.18 Accessibility is measured using Greater Manchester Accessibility Levels (GMAL). GMAL is a detailed and accurate measure of the accessibility of a point to both the conventional public transport network (i.e. bus, Metrolink and rail) and Greater Manchester's Local Link (flexible transport service), taking into account walk access time and service availability. The accessibility index score is categorised into eight levels, 1 to 8, where level 8 represents a high level of accessibility and level 1 a low level of accessibility.
- 10.19 The current accessibility of the Chew Brook Vale (Robert Fletchers) site using Greater Manchester's Accessibility Level model (GMAL) has been identified as comprising areas of level 1 for accessibility, giving it a lower rating.

- 10.20 The Locality Assessment concludes that the main local destinations likely to generate walking and cycling trips are Greenfield village to the northwest of the site (0.6km), Greenfield Primary School (1.1km), Friezland Primary School (2.4km) and Greenfield St Mary's C.E (A) Primary School (0.2km).
- 10.21 In terms of walking and cycling, the A635 provides footpaths which are narrower than SFA standards both west and east and no cycle facilities, although there is full streetlighting and pedestrian refuge islands at the Chew Valley Road mini-roundabout. Multiple Public Rights of Way (PRoW) cross the site as proposed in GMSF 2020 between Greenfield to the west and the surrounding countryside of Saddleworth Moor – PRoWs cannot, however, be used by cyclists unless they are designated as bridleways.
- 10.22 In terms of public transport the Clarence Hotel stop is located immediately adjacent to the proposed site access onto the A635 and provides frequent bus services into the centre of Ashton-under-Lyne. Greenfield's railway station provides hourly services west to Manchester and east to Huddersfield and Leeds, but at 1.4km west of the site, is beyond 15-minutes walking distance and therefore unsuitable for commuters wishing to walk to the station.
- 10.23 In light of the above the Locality Assessment proposes the following in relation to walking, cycling and public transport provision:
- A permeable network for pedestrian and cyclist priority within the development is required including sufficient secure cycle parking for all dwellings.
 - Given the location of the allocation and its proximity to the Greenfield local area, the internal walking and cycle network should be linked to high quality routes connecting through to these areas, including the proposed Bee Network.
 - Access for cycling to the allocation is likely to be particularly important given the mix of land uses (including leisure) and need to support travel to Greenfield station in a way that is not reliant on travel by private car. The Locality Assessment suggested that improvement to cycle access within Greenfield, such as on the route between the site and Greenfield train station, could be modified to include cycle lanes (if and where possible) or introduce other priority measures for active travel.

- Pedestrian provision, such as crossings, will also need to be introduced on the A635 to allow safe foot access to and from the site through to Greenfield village and for access to bus stops on the opposite side of the A635 road.
- As a section of the Bee Network passes immediately north of the allocation and proposes the improvement of pedestrian and cycling infrastructure on the A635 Holmfirth Road between Diggle, Greenfield and Mossley. The Locality Assessment proposes that pedestrian and cycle access to and from the allocation should be integrated into this network in order to allow for improved cycle and pedestrian routes into the centre of Greenfield and west towards Mossley and Ashton-under-Lyne.
- With regards to public transport, the needs of the allocation have been considered jointly with TfGM, and it has been identified that the allocation will need to be supported by the existing bus and public transport services which run adjacent the west of the allocation. Although existing bus services offer a good frequency of service in the context of the more rural location, the eastern parts of allocation will be more distant from these facilities reducing their attractiveness to users. A potential extension to the existing bus services into the site was considered in order to allow improved public transport access for the entire allocation however the Locality Assessment has identified this as not a viable consideration given the implications for route journey time and number of users generated by the allocation.

10.24 With regards to parking the Locality Assessment concludes that it is not necessary to consider in detail the parking standards for residential units relevant to the site at this stage of assessment as there are no particular constraints on achieving likely minimum parking standards that may be in application at the time the site is brought forward. Accommodation of Electric Vehicle (EV) parking, while an important factor in developing more efficient transport connections for the allocation, should be considered at the detailed design stage, potentially as an integration of specific house design.

10.25 A broad assumption has been made that a maximum of 2 spaces per dwelling is likely to be proportionate, however other alternative local policy requirements are

likely to be equally deliverable and can be considered at the planning application stage.

Impact on Local Highway Network and Strategic Road Network

- 10.26 According to the Locality Assessment the A670 Oldham Road / A669 Shaw Hall Bank Road junction illustrates notable congestion, operating significantly over capacity during both peak periods by 2040. These issues are worsened by development traffic, although the overall proportional change in impact is relatively slight. Given the location of this junction, which is constrained by local topography and the presence of the railway, mitigation involving infrastructural changes to increase capacity appears not to be deliverable and given the scale of impact from development traffic no such scheme would be proportional.
- 10.27 As such, the Locality Assessment has concluded that a mitigation scheme is not necessary in support of the allocation. Oldham Council are, however, in the process of developing potential signalised control at this junction – this is to facilitate a new lift to the railway station from the A670 Oldham Road itself. The details of this scheme are yet to be finalised and will likely be discussed at the Transport Assessment stage.
- 10.28 The development is unlikely to have a substantial impact on the capacity of the other junctions assessed in 2040 nor of wider locations given its context.
- 10.29 No offsite highway mitigations have therefore been considered necessary with regards to the introduction of development trips from this site.
- 10.30 The Locality Assessment therefore concludes that the Chew Brook Vale (Robert Fletchers) development has been considered unlikely to result in significant increases in congestion across the surrounding local highway network.
- 10.31 The cumulative impact of the allocations on the Strategic Road Network (SRN) has also been considered. Based on the proposed buildout of the site, and its distance from the nearest section of the Strategic Road Network (SRN), the – Chew Brook Vale (Robert Fletchers) allocation has been considered unlikely to present traffic
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impacts on the surrounding road network, therefore, no mitigation has been considered with regard to the introduction of development trips from this site.

10.32 The final list of interventions considered necessary to support the Chew Brook Vale site and mitigate the cumulative impacts of the allocation are set out in Table Two below. These are categorised as follows:

- **Allocation Access**
- **Necessary Strategic Interventions** - interventions with strategic implications for which the development will be expected to contribute or pay for, and which have to come forward in order for the development to be allocated;
- **Necessary Local Mitigations** - includes measures such as improvements to off-site junction and public transport facilities which will be necessary for the development to be allocated.
- **Supporting Strategic Interventions** - interventions with strategic impacts to which development would be expected to make a contribution where possible to enhance the connectivity of the site – these costs are not included in the viability calculations – this includes measures such as Metrolink extensions and some motorway interventions.

10.33 As stated above these interventions have been identified as necessary based on the strategic allocation as proposed in GMSF 2020.

Table Two – Final list of interventions to support Policy JP Allocation 15

Mitigation	Description
Allocation Access	
A635 Holmfirth Road Access Junction	Proposed priority or traffic signalised junction, higher cost item assumed.
Access road	New 7.2m wide single carriageway, 1.1km in length to include standard width pedestrian and cycle facilities and to be future proofed with bus laybys for longer term provision of bus services.

Mitigation	Description
Bridge over Chew Brook	Approximately 35m span bridge over Chew Brook to provide linkage of site access to A635 Holmfirth Road access junction.
Necessary Strategic Interventions	
None identified	
Necessary Local Mitigations	
Permeable network for pedestrian and cyclist priority within the development	Assumed full permeability of cycle and pedestrian access, as well as direct connections to PRowS either bounding or near the development and improvement of walking/cycling facilities on A635 and Chew Valley Road. All pedestrian and cycle networks internal to the site, as well as connecting PRowS, should be built or upgraded to the standards outlined in the Bee Network, as well as providing connections to the nearest section of the Bee Network.
Sustainable access package of off site improvements to walking and cycling routes	Chew Valley Road – Package of measures to support pedestrian and cycle access between allocation and Greenfield Railway Station via Chew Valley Road delivered in accordance with standards outlined in the Bee Network wherever possible.
Supporting Strategic Interventions	
None identified	

10.34 Please note that the necessary local mitigation measures identified are purely a highway infrastructural intervention prepared to illustrate that options may be available at this location – further detailed consideration would be required at the time of a planning application to ensure development of an option suitable for all users including pedestrians, cyclists and bus users.

10.35 In relation to the necessary local mitigations these are as follows:

- **Permeable network for pedestrian and cyclist priority within the development** - In order to promote and encourage sustainable transport modes, as well as providing safe and efficient accessibility for non-vehicular traffic, the development is to both provide ease of access for pedestrian and cyclist traffic into and out of the site, as well as connecting and improving PRow that either directly connect or pass near the proposed site. This is to include upgrading of the local PRow routes to meet the standards of the proposed Bee Network and, wherever possible, connect directly to sections of the Bee Network. Furthermore, pedestrian and cycle facilities in the areas surrounding the allocation should be improved wherever possible in order to allow for safe accessibility by non-vehicular users to both all parts of the development, but also the adjacent residential, employment and retail areas. This scheme also includes widening of footpaths along the A635 Holmfirth Road, Manchester Road and Chew Valley Road so that they meet SFA standards and provide safe access for pedestrian, cycle and horse-rider traffic. Promotion of sustainable transport alternatives will also help to answer concerns regarding increased pollution from added vehicular trips on the local road network.
- **Sustainable access package of off site improvements to walking and cycling routes** - A package of measures will be necessary to promote and encourage walking and cycling between the allocation and Greenfield village facilities and onwards sustainable access to Greenfield Station via Chew Valley Road. Given the nature of the Chew Valley Road corridor which is constrained in width and contains a mix of residential properties it may not be possible or necessary for improvements to, in all cases, fully meet the standards of the proposed Bee Network for walking and cycling facilities. However the Locality Assessment recommends that this be considered as the starting point for a supporting scheme as the adopted standard, wherever is possible, so as to promote the route as a key corridor for walking and cycling through the village.

Phasing of Mitigation

10.36 Expected phasing of the allocation, based on the concept planning work carried out by IBI prepared to inform the allocation in GMSF 2020, has been provided to inform

the modelling. The indicative intervention delivery timetable for the mitigation measures set out above are as set out Table Three.

Table Three: Mitigation Measures – Indicative Intervention Delivery Timetable

MITIGATION	2020-2025	2025-2030	2030-2038
Site Access			
A635 Holmfirth Road Access Junction	✓		
Access Road	✓		
Access Bridge		✓	
Necessary Local Mitigations			
Permeable network for pedestrian and cyclist priority within the development		✓	
Sustainable access package of off site improvements to walking and cycling routes		✓	

Summary

10.37 The fundamental transport constraint associated with delivery of the allocation comprises the identification and design of a suitable point of vehicular access from the A635 Holmfirth Road, as well as the delivery of a spine road capable of providing vehicular access to the allocation. A review of options for the site access undertaken as part of the Locality Assessment has identified several fundamental physical and environmental constraints to improving access, including the steep topography of the site which creates uncertainty regarding the deliverability of any of the options considered.

10.38 The level of design work required to ensure such an access could be practically delivered is likely to require a level of detailed highway design based on site survey and investigation. This design should include an outline of how the access will combine with the identified need for a new internal access road on an east/west axis.

10.39 Based on the information contained within Locality Assessment it is concluded that the traffic impacts of the site as proposed in GMSF 2020 are less than severe subject to the implementation of localised mitigation at a discrete number of locations. The “High-Side” modelling work indicates that in general other junctions within the vicinity of the site will either operate within capacity in 2040 with GMSF development, or that in some cases junctions operating over capacity in the future year would not be materially worsened by development traffic.

10.49 While it has been noted that the A670 Oldham Road / A669 Shaw Hall Bank Road junction illustrates notable congestion during the peak periods, due to its location, which is constrained by local topography and the presence of the railway, mitigation involving infrastructural changes to increase capacity have not been considered to be necessary– although Oldham Council is in early development of their own scheme to signalise the junction. Therefore, no mitigation strategies have been developed to accommodate off-site development traffic introduced by the allocation.

10.50 In summary, the assessment has provided an initial indication that the allocation is deliverable and to inform viability. Further detailed work will be necessary to identify the detail of the interventions required to ensure the allocation can be accessed however no offsite issues with the wider highway network have been identified that would prevent such an allocation being made based on the assessed impacts on the transport network.

PfE 2021 Transport Locality Assessment Addendum

10.51 Since preparation of the 2020 Locality Assessment’s a number of factors have necessitated a review of their conclusions and the revision or confirmations to the findings as appropriate. Those factors include:

- The removal of some Allocations from the Plan;
- Changes to the quantum of development proposed within some Allocations;
- Changes to the scale or type of transport supply (also known as transport mitigation schemes or interventions) proposed close to or within some Allocations;

- The withdrawal of Stockport Council and their associated Allocations from the Greater Manchester Spatial Framework; and,
- Modifications to the reference transport network to include newly committed schemes on the strategic road network (SRN).

10.52 These are factors which, taken together, may alter the pattern of traffic movements close to the remaining Allocations and impact on wider traffic movements across the conurbation. As such, it was considered necessary to check that the conclusions of the original assessments remain robust. The Oldham Locality Assessment Update Report (2021) sets out the processes behind, and conclusions of, the review for Oldham. This note identifies whether any of these changes are likely to significantly impact on the conclusions of the original assessments. Where needed it sets out an updated technical assessment of the impact of the Allocations in Oldham on the operation of the transport network and reviews and revises the transport infrastructure necessary to mitigate the impacts of the allocations.

10.53 The largest change to demand since the publication of the locality assessments has been the removal of the Stockport allocations from the plan. In consideration of Oldham District's allocations in relation to Stockport District, Systra concluded that the distance between the two means it is unlikely to result in significant impacts upon the measured assumptions observed in the previous Locality Assessment study.

10.54 The main changes to be considered were therefore in relation to:

- The removal of allocations at GMA21 – Thornham Old Road, GMA17 Hanging Chadder and GMA20 Spinners Way between the fourth and fifth round of modelling; and
- Revisions to the allocations that have been made between the fourth and fifth round of modelling, particularly in relation to capacity and phasing.

10.55 Based on the removal of three allocation sites from Oldham (GMA21 – Thornham Old Road, GMA17 Hanging Chadder and GMA20 Spinners Way), as well as a general reduction in development quantum for those allocations remaining within the latest Locality Assessment Update Report (2021), it is considered unlikely that there

will be significant changes or increased implications on both the local and strategic road networks within the district due to PfE related traffic.

10.56 Notwithstanding this, it is possible that between the fourth and fifth round of modelling, junctions could potentially see increases in traffic due to background growth, changes in the assignment of traffic or the increased quantum of allocations outside the Oldham district which could have cumulative effects at specific locations.

10.57 Whilst the PfE allocation is for around 90 homes and up to 6,000sqm of commercial, leisure and retail floorspace, for the purposes of testing the impact of the allocation through the strategic model the assessment remains based on a capacity of 171 homes which are assumed to be built out by 2040.

10.58 The main findings from the addendum were that:

- Based on flows derived from the latest round of modelling, any interventions outlined in the previous Locality Assessment are to be delivered as part of the allocation. No additional forms of interventions are considered necessary and it is anticipated that most of the interventions will be required post 2025, however, by 2025, the necessary local mitigation is anticipated to be required.
- The changes to the quantum of development tested through the update does not affect the need for the active mode interventions previously proposed. It should be noted that, since the publication of the Locality Assessments, an Active Travel Design Guide has been published by GMCA and TfGM. This Design Guide identifies design principles for the Bee Network that should be followed, and encompasses aspects such as segregated and shared infrastructure, crossing facilities and junction design. Any active mode interventions that are implemented in support of this allocation should follow this Design Guide.
- As identified in the original Locality Assessment questions remain as to the final layout of the vehicular access to the allocation from the A635, with further discussions required as part of the planning process. Nevertheless, the council consider that significant improvements will be needed to satisfactorily access the site, even with the lower number of homes now proposed through PfE 2021, and this has been reflected in the policy wording.

10.59 In response to the above Policy JP Allocation 15 sets out that development of the site is required to:

- Provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standards. As set out in the reasoned justification any proposals will need to be agreed by the local highway authority and to adoptable standards.
- Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site.
- Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site.

11.0 Flood Risk and Drainage

11.1 A Strategic Flood Risk Assessment (SFRA) has been carried out for Chew Brook Vale (Robert Fletchers). The site was subject to the exceptions test as part of the SFRA Level 2 work.

11.2 The Level 2 SFRA has shown that the functional floodplain (3b) covers a higher extent of the site than previously mapped. Initially this resulted in plots A, B and C as shown on the indicative high-level concept plan being removed from the developable area. Ideally, such areas should be used for open space to flood naturally and to store water.

11.3 The Flood Map for Planning shows a large area of flooding from Dove Stones Reservoir. This part of the flood zone is not representative of actual risk. The

Environment Agency (EA) has confirmed this to be a remnant of older broadscale modelling and should terminate at the downstream end of the reservoir.

11.4 Based on the presence of a unmodeled Fletcher's Brook watercourse and the location of the reservoir, it was determined that additional flood risk evidencing work was required to further inform the Exception Test for the site.

11.5 Additional to the Level 2 SFRA, the GMCA commissioned further evidence as follows:

- Hydraulic 2D flood modelling, accounting for climate change, of Fletcher's Brook, including generation of up to date hydrological inputs,
- Survey of the open channel and structures, and CCTV survey of the culverts to inform the flood modelling,
- Culvert blockage scenario modelling of the Fletcher's Brook culvert, entering the site from the south, with its inlet at Bradbury's Lane,
- Modelling of the emergency draw-down arrangements for Dove Stone Reservoir, and
- Assessment of updated 2020 EA Reservoir Flood Map model outputs.

11.6 The findings of this additional work is considered below.

Fluvial modelling of Fletchers Brook:

11.7 The Fletchers Brook modelling showed a large area of the Fletchers Mill is at risk from flooding and therefore more vulnerable. The modelling shows a large proportion of the site to be at risk from Fletcher's Brook. A large area is at risk from the 5% AEP event, which would normally be designated as functional floodplain where development of any type is permitted (unless water compatible). It is thought the majority of the existing buildings on the site may be demolished and the land regraded somewhat. However, no development should take place within the modelled 5% AEP flood extent, or the 1% AEP event if possible. The 1% AEP event depths are generally shallow therefore it may be possible to raise finished floor levels above the 1% event level plus freeboard. Compensatory storage would have to be found onsite.

Culvert blockage:

11.8 Fletchers Brook: The impact of blocking the culvert inlet has been modelled to have almost no impact on the flood outlines and depths during both present day and future day (with 35% climate change uplift) 1% AEP events

Groundwater:

11.9 Groundwater follows topography and is unlikely to be an issue in this instance.

Reservoir drawdown modelling:

11.10 It is expected that under normal flow conditions (i.e. on a dry weather day) on Chew Brook and within the River Tame there would be no additional flood impacts to the site from an emergency drawdown event of 50% of the reservoir volume, other than an increase in water level and flow rate within the Chew Brook immediately downstream of the reservoir.

11.11 Under everyday conditions, no additional flood risk is anticipated as a result of emergency drawdown irrespective of the volume removed providing the flow rate does not exceed 4.86 m³ per second. If emergency drawdown protocol needs to be implemented whilst river levels are heightened or during a flood event, the best course of action would be for the addition of the emergency drawdown flow to not exceed that of the downstream channel capacity.

Surface Water Flood Risk:

11.12 The site has areas at risk from surface water flood risk. There are localised areas of ponding which tend to occur in and around the current waterbodies and in several square shaped areas, possibly purpose built to hold surface water.

Overall site assessment

11.13 It is likely the allocation can pass the Exception Test, as long as the advice in the Level 2 SFRA is followed and further work, once a layout plan has been finalised, shows the site can remain safe for its lifetime. As part of bringing the site forward for development:

- Early discussions should take place with the Environment Agency with regards to flood risk issues on this site.
- Options for mitigating the fluvial risk from Chew Brook and Fletcher's Brook must be investigated. The developable area should be reconfigured to remove any development from the 5% flood extent and residential use from the 1% flood extent.
- The Fletcher's Brook culvert should be fully surveyed and fed into an update of the hydraulic model to gain a more robust quantification of risk.
- Options for mitigating the risk from Fletcher's Brook should also be assessed, including possible upsizing of the culvert inlet under Bradbury's Lane, blocking gaps in the wall above the culvert inlet to contain surcharging water within the field, possible culvert removal downstream of the houses on Bradbury's Lane.
- A comprehensive drainage strategy should be formulated, based on a more detailed masterplan prior to the planning application stage, which accounts for the fluvial risk. Plans should ensure that safe access and egress routes during a flood are identified and included within the site design. Drainage arrangements should adhere to UU's requirements as directed through this Level 2 SFRA.
- Further masterplanning should be based on the Tame 2018 modelling and the Fletcher's Brook 2020 modelling before a more detailed layout plan is produced.

Flood Risk Assessment Requirements

- The FRA should fully account for the recommendations stated within the Level 2 SFRA.
- The modelling should be revisited once a revised layout plan is in place. Options modelling could be carried out including for land raising and compensatory storage.
- A hydrogeological assessment would be useful to ascertain the suitability of onsite infiltration SuDS for possible mitigation purposes.

- The FRA should include emergency planning procedures with consideration to safety around the onsite watercourses and safe access and egress routes in times of flood.
- Any FRA should be carried out in line with the NPPF; Flood Risk and Coastal Change Planning Practice Guidance; PfE and District Council Local Plan policies; and national SuDS policy and guidelines, in the absence of any local SuDS policy or guidelines.
- Throughout the FRA process, consultation should be carried out with the following, where applicable, the LPA; LLFA; emergency planning officers; EA; UU; the highways authorities; and emergency services.

11.14 Full details can be found in the SFRA reports and associated maps available online at found at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>.

11.15 In response to the above Policy JP Allocation 15 requires development to be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.

12.0 Ground Conditions

12.1 Initial work carried out to inform the high-level indicative concept plan states that given the previous use of Robert Fletchers site as a paper mill, and its subsequent dereliction, it is considered that the risk of contamination and, therefore the need for remediation, is high.

12.2 This would need to be addressed as part of the bringing forward development on the site.

13.0 Utilities

13.1 The high-level indicative concept plan has noted that service data provided by United Utilities has identified large drainage lines running along Holmfirth Road and Bank Lane to the north of the site with service lines leading to the existing industrial estate and the former Robert Fletchers paper mill site. A sewage line serves the site via the existing access road which runs parallel to Chew Brook. It is considered that the Robert Fletchers paper mill site contains significant services which would need to be assessed before development.

13.2 More detailed masterplanning will need to identify a workable drainage strategy which utilises existing watercourses as much as possible. Engagement with United Utilities and Environment Agency on this matter will be essential. Sustainable Urban Drainage Systems (SUDS) could be used to mitigate flood risk and surface water drainage issues on the site.

13.3 United Utilities have stated that attention will need to be paid to surface water drainage and early dialogue will be required as part of any future planning application. It is necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, developers, and over a number of years of construction.

13.6 In response to the above Policy JP Allocation 15 requires development to be informed by a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.

13.5 Policy JP-D1 Infrastructure Implementation also seeks to ensure that development does not lead to capacity or reliability problems in the surrounding area by requiring applicants to demonstrate that there will be adequate utility infrastructure capacity, from first occupation until development completion.

Section C – Environmental

14.0 Green Belt Assessment

14.1 The size of the strategic allocation is approximately 5.38 hectares, with a gross developable area of approximately 2.74 hectares and net developable area of 2.19 hectares when the areas at risk of flooding are removed.

Green Belt Exceptional Circumstances

14.2 Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances are evidenced and fully justified. The Green Belt Background Paper, available on the GMCA website, sets out the case for exceptional circumstances for seeking the proposed release of Green Belt to bring forward the allocations within the plan. The exceptional circumstances take the form of the strategic level case – high level factors that have influenced and framed the decision to alter boundaries, such as meeting housing need; and local level case – specific factors relevant to the proposed releases that complement the strategic case.

14.3 As outlined in section 4, the site selection process has identified the most sustainable locations by assessing potential sites against the site selection criteria (see the Site Selection Background Paper for full details) to ensure the proposed allocations meet the spatial objectives of the plan. In terms of the local-level case, the exceptional circumstances for the release of the Chew Brook Vale allocation from the Green Belt is that:

- The site meets Criterion 1 of the Site Selection criteria, as the site is made up of at least 30% previously developed land in the main as it includes a disused paper mill, which is 100% previously developed.
- The site meets Criterion 7 of the Site Selection criteria, as it would provide a deliverable site for housing in the north of Greater Manchester (GM) where there is an opportunity to capitalise on an existing high end housing market area and /

or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north.

- The site offers a unique opportunity to create an exemplar visitor destination at the gateway to the Peak District National Park providing commercial, leisure and retail facilities of up to 6,000sqm on a previously developed site, contributing to employment opportunities.
- Development of the site would enable the development of the former Robert Fletchers Mill site which is currently derelict and vacant.

14.4 The local-level case for exceptional circumstances, set out in the Green Belt Topic Paper, also includes a summary of the Green Belt Harm and mitigation assessment in relation to Chew Brook Vale. The findings from this assessment are also summarised in the section below (for information a summary of the Green Belt Stage 1 2016 study is also set out).

The Greater Manchester Green Belt assessment (2016)

- 14.5 The Stage 1 Green Belt assessment assessed the whole of the Green Belt in Greater Manchester, providing a comprehensive analysis of variations in contribution of land to the Green Belt purposes as set out in the NPPF.
- 14.6 The 2016 Greater Manchester Green Belt assessment identified that Chew Brook Vale is located within Strategic Green Belt Area (SGBA) 17. SGBA 17 lies to the north east of Oldham, extending to the Peak District National Park boundary. The land rises to the east and is cut by a series of valleys, occupied by villages including Uppermill, Dobcross and Delph which tend to be strung out along road corridors. The Green Belt continues east beyond the GM boundary.
- 14.7 Within this Strategic Green Belt Area Chew Brook Vale (Robert Fletchers) strategic allocation falls within parcel TS02, part of which also falls within Tameside. The parcel scored strong against Green Belt purposes 1 to 4 (purpose 5 was not part of the assessment). The full scoring is set out in the Table Four below:

Parcel Reference	Purpose 1a Rating	Purpose 1b Rating	Purpose 2 Rating	Purpose 3 Rating	Strategic Green Belt Area
TS02	Strong	Strong	Strong	Strong	17

Greater Manchester Green Belt Study – Assessment of Proposed 2019 GMSF Allocations and Cumulative Assessment of Proposed 2020 GMSF Allocations

- 14.8 The Stage 2 Green Belt study assessed the potential impact on the Green Belt that could result from release of land within the development allocations proposed in the Revised Draft (January 2019) of the GMSF. Its intention was to inform the finalisation of the proposed strategic allocations. The assessment therefore relates to the wider allocation proposed in GMSF 2019.
- 14.9 The Green Belt harm assessment identifies that the allocation makes a relatively significant contribution to preventing encroachment on the countryside, a relatively limited contribution to checking the sprawl of Greater Manchester, and a relatively limited contribution to preserving the setting of the historic town of Greenfield.
- 14.10 Release of the GMSF 2019 allocation would not weaken the Green Belt boundary and although only narrow strips of Green Belt would remain to the south and east, these border the Peak District National Park designation, which provides sufficient protection from development to prevent any potential urbanising containment.
- 14.11 The Green Belt harm assessment concludes that the release of the 2019 GMSF allocation would result in ‘moderate’ harm to Green Belt purposes but would have ‘no/negligible’ impact on adjacent Green Belt.
- 14.12 In terms of cumulative harm on Strategic Green Belt Area (SGBA) 17, release of the 2019 GMSF allocation would cause limited harm in terms of impact on sprawl as Greenfield is not part of the Greater Manchester large built-up area and would not diminish Greenfield’s separation from the urban area; would have no impact on the contribution to preventing merging of towns; would contain land in the countryside to the south; and would have a limited impact on the setting of Greenfield, but would not affect key elements of its historic character and setting.

14.13 The assessment identified whether mitigation would address harm identified. The principal cause of harm from release of this allocation would be from the loss of the Green Belt land within the allocation itself, as opposed to its impact on retained Green Belt land. As such, mitigation measures would not reduce the harm of release of this allocation.

14.14 Since assessment the 2019 GMSF allocation the boundary has been reduced to just that of the mill complex site. As a result, the areas of Green Belt surrounding the mill complex will be retained, which will maintain separation between the development area and Dove Stone Reservoir, the Peak District National Park and Greenfield. An update to the Green Belt assessment has been carried by LUC out to reflect the change to the allocation which has found that:

- Much of the area now proposed for release is occupied by built development that diminishes Green Belt openness, and the remainder of the site, although it contains some tree cover and some storage areas (including a former water body), is significantly influenced by that built development. The revised Allocation therefore makes only a relatively limited contribution to Purpose 3, and its degree of separation from the urban edge, relative to its size, together the extent of development on the site, means that it does not contribute to preventing the sprawl of the large built-up area of Greater Manchester. There is no change to the 2019 ratings for contribution to other Green Belt purposes.
- The now-retained Green Belt land between the Allocation and the edge of Greenfield would be subject to a slightly greater degree of urbanising containment which would constitute a minor impact on its strength. The release of the revised GM18 Allocation would cause low-moderate harm.
- The GMSF 2020 cumulative assessment reported only a limited impact on the contribution of SGBA 17 to checking the sprawl of the Greater Manchester large built-up area (Purpose 1). This impact is further reduced by the retention of Green Belt land between Greenfield and the Allocation in the addendum.
- The retention of that part of the 2020 Allocation that is open and undeveloped countryside reduces encroachment on the countryside (Purpose 3), even though

there will be a slight weakening of its Green Belt contribution as a result of containment between the edge of Greenfield and the Allocation.

Identification of Opportunities to Enhance the Beneficial Use of the Green Belt (2020)

14.15 Lastly LUC prepared a report on the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in 2020. This report provides evidence to show where there are opportunities to offset the loss of Green Belt through compensatory improvements to the environmental quality and accessibility of retained and proposed Green Belt land. This study has sought to identify opportunities to enhance Green Infrastructure within 2km of the sites proposed for release. It should be noted that since the assessment the allocation boundary has been reduced to just that of the mill complex site.

14.16 These opportunities should feed into Local Plans and more detailed masterplanning work for the site allocations.

14.17 The summary of priority projects for Green Belt enhancement surrounding Chew Brook Vale (Robert Fletchers) includes:

14.18 Access:

- Develop a coherent and improved interpretation strategy to improve visitor experience along the network of long distance footpaths.
- Introduce realigned sections of long distance footpaths to create a range of circular health walks at the settlement edge, providing a contrast to routes solely accommodated with the valley floor at the moorland fringe.
- Address gaps in the continuity of the cycle network recognised by TfGM through the creation of a continuous link at Mossley Brow and Mossley Station.
- Improve crossing points on the A670 and the A635.
- Create formalised PRow links to Dove Stone Reservoir from the settlement edges of Greenfield and Mossley.
- Develop a Beeway parallel the Huddersfield Narrow Canal; providing off-road access to Greenfield, Mossley and Stalybridge.

14.19 Sport and recreation:

- Improve drainage systems and ancillary accommodation within the existing playing fields at Castle Lane and Churchill Fields.
- Create recreational facilities which afford views towards the Peak Fringe backdrop.
- Enhance the landscape around Dove Stone Reservoir for improved recreational and educational uses.
- Offer accessible sports packages to local residents within neighbouring residential areas, including Saddleworth Cricket Club, Bowling and Tennis Club and Saddleworth Golf Club.

14.20 Biodiversity and wildlife:

- Protect and where possible enhance semi-natural habitats such as the tracts of heather moorland, blanket bog, acid grassland and broadleaved woodland associated with the upland landscape. Encourage the natural regeneration of woodland and wetland habitats in order to slow the water flow towards the River Tame below.
- Working in conjunction with the EA, the opportunity exists to improve river corridor flood risk management as well as alleviate surface water flood risk issues. This could be achieved through the use of SuDS and water storage techniques in agreement with landowners and third parties.

14.21 Landscape and visual:

- Reinforce the contrast between the well wooded lower slopes and the sparsely vegetated upper moorland through the introduction of structural planting around Dove Stone Reservoir.
- Restore drystone walling, hedgerows and historical enclosure patterns within the landscape.

14.22 In response to the above Policy JP Allocation 15 requires development to:

- Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt.

- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

15.0 Green Infrastructure

- 15.2 The indicative high-level concept planning work which informed the strategic allocation in the 2019 and 2020 GMSF, and therefore relates to the previous larger allocation, recommends that development should proactively deliver a coherent green infrastructure network, combining attractive spaces and routes which link the development with the surrounding area. This should include green corridors, landscape buffers and open recreational spaces that are interconnected and coordinated. Green infrastructure should also be used to ensure development parcels are defined, boundaries are appropriately treated, ecological networks are enhanced by providing a recreational route along Chew Brook and connect existing PRow / recreational routes. Critically the green infrastructure should ensure that the natural character of the site is retained and short and long-distance views are protected.
- 15.3 The indicative high-level concept plan also recommends:
- that existing water features and ponds, hedgerows, trees and open space are retained where possible and enhanced; and
 - the use of green space to provide an attractive interface within residential parcels, a mix of hard and soft landscape with opportunities for formal and informal play.
- 15.4 Given that the site boundary now just includes the mill complex much of the concept plan covers land outside of the final allocation. However, the principles, as far possible may still apply to any future masterplan and design code delivered for the allocation as required by Policy JP Allocation 15. Development would also be required to have regard to any local policies on Green Infrastructure and open space.

15.6 In response to the above Policy JP Allocation 15 sets out that development of the site is required to:

- Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;
- Retain and enhance the biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;
- Provide further surveys on extended phase 1 habitats, bats and birds to inform any planning application;
- Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;
- Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement;
- Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive; and
- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

16.0 Recreation

- 16.1 The high-level indicative concept planning report, which informed the 2019 and 2020 GMSF strategic allocation identifies that existing open space is an important feature in and around the site, and the retention of land helps to retain much of the sites existing character, as well as providing areas for recreation and wildlife improvements. Open space is a key feature within this site as it provides key links both physical and visual towards existing PROW's and the Peak District National Park.
- 16.2 Now that the site boundary is limited to the Robert Fletchers mill complex open space is not a key feature of the site at present, however it is still an important feature around the site and any future masterplan and design codes that inform future planning applications need to address this, in particular how the site links to the surrounding countryside and any relevant local policy requirements.
- 16.3 In relation to open space, sport and recreation Policy JP Allocation 15 states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies.
- 16.4 At present, Local Plan Policy 23 requires all major developments to contribute to new and/ or improved open space, sport and recreation provision whether onsite or, in some circumstances, offsite in line with local surplus' and deficiencies. Policy 23 will be reviewed as part of the ongoing Local Plan Review.

17.0 Landscape

- 17.1 Chew Brook Vale falls within Open Moorlands and Enclosed Upland Fringes (Dark Peak) landscape character type and a landscape character area called Shore Edge to Dove Stones Reservoir, as identified within the Landscape Character Assessment (2018), which was prepared to inform the GMSF (now PfE).

17.2 The assessment sensitivity tested two development scenarios against each identified landscape character area. The landscape type has been scored overall as having medium to high sensitivity to 2-3 storey residential development and high sensitivity to commercial / industrial development. The report sets out guidance and opportunities for future development and landscape management / enhancement.

17.3 Guidance and opportunities to consider within this Landscape Character Type include:

- Avoid siting any development within the open moorland and areas on the immediate edge of the Peak District National Park.
- In keeping with current settlement pattern – utilise dips in the landform and existing or new tree/woodland cover to integrate limited new development into the landscape.
- New housing development should replicate traditional vernacular styles and materials (Millstone Grit).
- Ensure any new development respects the character and historic qualities of the Conservation Areas.
- Strengthen and restore the dry stone wall network, using locally-sourced Millstone Grit and reflecting characteristic building styles.
- Protect and where possible enhance semi-natural habitats and networks, including heather moorland, blanket bog, acid grassland, rush pasture/purple moor grass and traditionally managed hay meadows.
- Encourage the natural regeneration of woodland and restoration of wetland habitats fringing the stream valleys, slowing water flow before it enters the Tame.
- Design-in the introduction of SuDS to any new development, addressing any changes in hydrology and subsequent knock-on effects, such as increased diffuse pollution from agricultural run-off.
- Ensure any new development does not dilute the strong field patterns associated with the upland fringe landscape and its characteristic moorland intakes.
- Conserve open, sweeping skylines which form a backdrop to views from valley settlements and Greater Manchester more widely.
- Conserve and protect the setting of important heritage assets.

- Ensure any new development does not adversely affect the special qualities of the Peak District National Park, including its beautiful views, sense of tranquillity and dark night skies, and the vital benefits that flow beyond its boundary.
 - Protect long, uninterrupted views from higher ground over the mill settlements in the valleys below, and Greater Manchester communities beyond.
 - Protect the overriding rural, remote and often bleak 'Dark Peak' characteristics of the landscape.
- 17.4 Policy JP Allocation 15 sets out that development will be required to be designed to minimise the landscape impact having regard to the findings and recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Open Moorlands and Enclosed Upland Fringes (Dark Peak).
- 17.5 The site sits at the bottom of the Chew Valley with steep hills to the north and south. The topography within the site is varied with the Chew Brook sitting below the site in a cutting. The varied topography limits development to generally flat land at the base of the slopes and within previously developed land, former Robert Fletchers paper mill.
- 17.6 The high-level indicative concept planning work, which informed the 2019 and 2020 GMSF strategic allocation includes a landscape strategy for the site. The strategy includes retaining existing features; retaining and enhancing water features; retaining and enhancing hedgerows; protecting trees and adding bird and bat boxes; retaining open space; proposed green corridor, key green spaces, residential green spine and primary gateways.
- 17.7 Whilst the site boundary is limited to the Robert Fletchers mill complex it is still important to make the most of existing landscape in and surrounding the site. Any masterplanning and design codes that inform future planning applications will need to address this and any local policy requirements.

18.0 Ecological/Biodiversity Assessment

18.1 The high-level indicative concept planning work recognises that there is an opportunity to maximise the topography of the site, capitalising on the views and utilising the existing natural features displayed across the site. Whilst the high-level indicative concept planning work informed the 2019 and 2020 GMSF strategic allocation this is still relevant for any development coming forward.

Preliminary Ecological Assessment

- 18.2 Conclusions from the Preliminary Ecological Appraisal, carried out by GMEU in 2020, on the 2019 and 2020 strategic allocation identified that there are potentially significant ecological constraints associated with this site, most notably the presence nearby of European designated sites. The ponds, woodland, water course and bird assemblages place potentially significant ecological constraints to the development of this site. Extended phase 1 habitat surveys; bat surveys; amphibian surveys (included great crested newts); water vole surveys; and bird surveys would be required to inform planning applications.
- 18.3 An addendum to the Preliminary Ecological Appraisal has been prepared to reflect the amendments to Chew Brook Vale (Robert Fletchers) which relates to the mill complex only. The appraisal states that the proposed allocation (the former mill complex) does not support notable habitats but there are notable habitats adjacent to the complex, including ponds, broadleaved woodland and a water course.
- 18.4 The former Mill buildings have potential to support bats and nesting birds. While the ponds, woodland, water course and potential bird assemblages on the wider sites will need some consideration in any future development proposals. Extended phase 1 habitat, bat and bird surveys would be required to inform planning applications.
- 18.5 As such, allocation Policy JP Allocation 15 requires development to:
- Retain and enhance the biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a

- meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment;
- Provide further surveys on extended phase 1 habitats, bats and birds to inform any planning application;
 - Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;
 - Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement; and
 - Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good status' as proposed under the EU Water Framework Directive.

19.0 Habitat Regulation Assessment

- 19.1 A Habitat Regulation Assessment (HRA) has been carried out to appraise the 2020 GMSF and PfE 2021, by the Greater Manchester Ecology Unit (GMEU) in October 2020. The report includes the identification of strategic sites which may have impacts on European protected sites, an assessment of these impacts and available mitigation for these impacts. All strategic allocations have been screened into the assessment because of potential cumulative effects from air pollution caused by increased road traffic.
- 19.2 Chew Brook Vale (Robert Fletchers) was screened in as it is within 1km of the South Pennine Moors SPA/SAC and there are potential effects from increased recreational pressure and cumulative air pollution from increased traffic. The site as it was proposed in GMSF 2019 and GMSF 2020 may have also acted as Functionally Linked Land.
- 19.3 The HRA has identified that the proposed allocation at Chew Brook Vale (Robert Fletchers) is not functionally linked to the South Pennine Moors (SPA).

- 19.4 In terms of recreational disturbance there are specific policies in PfE 2021 aimed at improving local Green Infrastructure, protecting and improving designated nature conservation sites and upland habitats and a specific policy addressing the need to avoid harm to European designated sites from the operation of the plan. These policies will act to mitigate for any ‘diffuse’ recreational impacts.
- 19.5 In addition, it is recommended that as additional mitigation for Chew Brook Vale (Robert Fletchers):
- That developments of more than 50 housing units are required to provide local, high quality and meaningful green infrastructure for public recreation in order to deter people from using the Moors for recreation.
 - That residents of new houses in developments of more than 50 units are required to be supplied with information concerning the importance of the South Pennine Moors and of the need to protect the special interest of the Moors.
 - That the GMCA contribute to the development of a regional (cross-boundary) Nature Recovery Network including the South Pennines, to be completed within three years of the adoption of the PfE.
 - That as part of the above Nature Recovery Network a visitor management strategy is developed for the South Pennines, in partnership with surrounding relevant authorities, to be completed within three years of the adoption of the PfE.
- 19.6 No further site level HRA was required in relation to air pollution for Chew Brook Vale.
- 19.7 The assessment concluded that the operation of the GMSF (now PfE) will not cause adverse impacts on site integrity of any European designated sites providing that the recommended mitigation measures are included in the Plan and implemented.
- 19.8 It is therefore concluded that there is insufficient evidence of any harm to the special interest of European sites for which no effective mitigation is available to justify the removal of any of the proposed allocated areas for strategic development from consideration at this stage of Plan production.

19.9 The GMCA and TfGM are responding to Natural England's comments on the draft HRA (2020) by commissioning additional air quality modelling to more accurately assess the implications of changes in air quality on European sites that could potentially be affected by changes to nitrogen levels arising from changes in vehicle movements in Greater Manchester or within close proximity of the Greater Manchester boundary.

19.10 A Habitat Regulation Assessment (HRA) has been undertaken and supported by an assessment of air quality impacts on designated sites. The following sites have been screened out at Stage 1 HRA:

- Rixton Clay Pits (SAC)
- Midland Meres & Mosses – Phase 1 Ramsar
- Rostherne Mere (Ramsar)

19.11 The following sites requires Stage 2 Appropriate Assessment:

- Manchester Mosses (SAC)
- Peak District Moors (South Pennine Moors Phase 1) (SPA)
- Rochdale Canal (SAC)
- South Pennine Moors (SAC)
- South Pennine Moors Phase 2 (SPA).

20.0 Historic Environment Assessment

20.1 An initial Historic Environment Assessment Screening Exercise prepared by the Centre for Applied Archaeology, University of Salford, in June 2019 recommended that Chew Brook Vale (Robert Fletchers) is screened in for further assessment. It identified that there are designated heritage assets within the site allocation, and further afield. Further assessment of the assets was recommended, as was consideration of archaeological remains.

20.2 To address the recommendations of the initial screening exercise, Oldham Council has prepared a Historic Environment Assessment for each of its strategic allocations to inform the GMSF 2020. In terms of Chew Brook Vale, five listed buildings and two Conservation Areas were considered. The assessment concluded that the site did

not make any contribution to the significance of the above assets. However, Greenfield House was within the site allocation at that point in time and there was an opportunity through development proposals for the site to enhance this asset and its setting as it currently has a feel of neglect.

20.3 An addendum to the Historic Environment Assessment was prepared in 2021 to reflect the changes to site boundaries, including Chew Brook Vale (Robert Fletchers) and to inform PfE 2021. The key difference for the allocation with regards to the historic environment is that Greenfield House now sits outside of the strategic allocation. Again, the assessment concluded that the site did not make any contribution to the significance of the above assets. Although the redevelopment of the site may enhance the wider setting to Greenfield House.

20.4 The assessment identifies a number of measures that could be put in place to maximise enhancement to heritage assets:

- Ensure new development is informed by assessments such as landscape character and further HIAs and is in keeping with the character of the area.
- The use of local materials will be required.
- High levels of landscaping will be required and the findings of the Landscape Character Assessment should be considered.

20.5 In response to the above Policy JP Allocation 15 states development must be informed by the findings and recommendations of the Historic Environment Assessment (2020) and addendum (2021) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.

20.6 The reasoned justification expands on the above, stating that heritage assets play an important role in the area's local historical and cultural identity and distinctiveness. There are undesignated assets throughout the site and a number of other heritage assets within close proximity, including Hey Top Conservation Area and Greenfield House and New Barn Grade II Listed Buildings which lie outside of the strategic

allocation boundary. Any development would need to consider the impact on their setting, through the completion of a further Heritage Impact Assessment and, as stated above, having regard to the Historic Environment Assessment (2020) and addendum (2021). Any development proposals should also have regard to the findings and recommendations of the Oldham Mill Strategy. Finally reflecting the sites unique location, the Design Code should ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.

21.0 Air Quality and Noise

- 21.1 Air Quality is covered by thematic policy JP-S 6 Clean Air in PfE 2021 which sets out a range of measures to support air quality. Places for Everyone sets out a commitment to improving air quality by locating development in locations which are most accessible to public transport. The proposed allocation is not within an AQMA.
- 21.2 The principles behind the high-level indicative concept plan prepared for the allocation encourages a walkable site comprised with active, legible and attractive streets. Long distance PRoW should be protected and enhanced by the development. The plan notes that PRoW are disjointed, and a connected network is required. Cycle movement is also restricted and effort to enhance this recreation opportunity should be undertaken. These principles remain relevant for the allocation as proposed in PfE 2021.
- 21.3 In response to the above Policy JP Allocation 15 requires development to:
- Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site.
 - Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and

informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;

21.4 There are no particular noise constraints identified for this site.

21.5 Policy JP-G 7 of PfE 2021 aims to significantly increase tree cover and protect and enhance woodland. The justification for the policy notes that trees and woodland can help mitigate noise pollution.

2.16 Policy JP Allocation 15 requires development to deliver multifunctional green infrastructure and high levels of landscaping. A visitor management plan is also required to ensure no adverse impact on the surrounding area.

Section D – Social

22.0 Education

- 22.1 It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision.
- 22.2 There are four primary schools within a 1.5-mile radius of Chew Brook Vale (Robert Fletchers), one secondary school within 3 miles and one other type of education provision.
- 22.3 Policy JP Allocation 15 requires development to contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority.
- 22.4 Oldham Council is currently working on developing a methodology for S106 Contributions for Education. Once finalised these will be used to secure contributions towards education provision as appropriate.

23.0 Health

- 23.1 The high-level indicative concept plan has identified that the surrounding health care facilities, such as GPs and Pharmacies, are typically found in urban centres of Greenfield or Uppermill. Oldham Hospital is located within a 20 to 30-minute drive from the site.
- 23.2 The high-level indicative concept plan notes that no specific guidance has been given regarding health provision, however it is not considered that enhanced or new health centres would be required to deliver Chew Brook Vale (Robert Fletchers).

- 23.3 Nevertheless, Policy JP Allocation 15 requires that development provides for appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health.
- 23.5 The Integrated Assessment for the GMSF incorporated a Health Impact Assessment. Chew Brook Vale scored significantly positive against supporting healthier lifestyles and supporting improvements in determinants of health. This is due to the policy requiring developments to deliver necessary highway improvements including walking, cycling and public transport infrastructure and incorporating multi-functional green and blue infrastructure to minimise visual impacts, mitigate environmental impacts and enhance linkages with neighbouring communities and countryside. This should include footpath networks, recreation routes providing a range of formal and informal recreation open space and access to existing public footpath networks and woodland areas.

Section E – Deliverability

24.0 Viability

Three Dragons Viability Assessment

- 24.1 The team of Three Dragons, Ward Williams Associates and Troy Planning and Design were commissioned to undertake a Viability Assessment of the Spatial Framework (VASF) to test whether the requirements of the National Planning Policy Framework (NPPF) are met, that is that the policy requirements in a plan should not threaten the development viability of the plan as a whole.
- 24.2 Within this broad aim, the GMCA sets out a number of objectives for the VASF that are summarised as being to:
- Meet the tests of soundness, using the approach to viability set out in guidance;
 - Address issues identified in consultation and engage with the development industry;
 - Provide a broad strategic understanding of viability, including costs and values, across Greater Manchester area based on current available information;
 - Test the viability and deliverability of an appropriate range of sample sites across Greater Manchester, including allocated sites; and
 - Identify policies that will affect viability and examine the likely cumulative viability impact of the proposed policies and standards in the Plan.
- 24.3 The VASF comprises three linked reports, The Strategic Viability Report, The Allocated Sites Viability Report and the Consultation Report. These are available on the GMCA website.
- 24.4 For the allocated sites viability testing, site characteristics, values and costs collected for the viability modelling drew on analysis of national and local datasets and policy documents and local consultations.
- 24.5 For all sites results are presented in terms of headroom available after developer return has been taken into account. On some sites further sensitivity testing has

been carried out to show the impact of changes to the assumptions, based on the council's justification to move away from the main model of testing.

- 24.6 In terms of benchmark land values for the purposes of the allocated sites they have all been considered as strategic greenfield with a benchmark land values of £250,000 per gross hectare, on the basis of consistency and that the majority of the sites are greenbelt releases and/or predominantly greenfield.
- 24.7 In terms of residential values, the assumptions sheet in the Strategic Viability Assessment Stage 2 Allocated Sites report sets out the values used for the individual site. For some allocations the local authority has suggested alternative figures. These are set out as sensitivity tests to the standard approach.

GMSF Strategic Viability Assessment Stage 2 Allocated Sites Findings, October 2020

- 24.8 In terms of attributing build and site costs, Oldham Council provided a high-level indicative concept plan for the Chew Brook Vale allocation setting out broad form of development for the site. This has informed the build costs of £23,553,387 for the site, as well as a degree of judgement from the consultants and officers.
- 24.9 In terms of the policy and mitigation costs assumed for this allocation, Oldham Council provided affordable housing assumptions, education requirements and open space/recreation requirements to be used within the testing based on the currently adopted Local Plan policies and/or updated evidence. The figures used are set out in the assessment assumption sheet found in the main report. In summary, for the Chew Brook Vale (Robert Fletchers) allocation, affordable housing contribution was tested at 15% of the site capacity (25.5 affordable homes) with a split of 50% Affordable Rent and 50% Shared Ownership, as per the recommendations of Oldham's Housing Strategy.
- 24.10 There are a range of other policy and mitigation costs around accessibility, future homes standards, electric charging points and biodiversity net gain that need to be applied when undertaking the testing, based on National and proposed PfE policies. These are applied in the same way as the generic testing and further detail can be found in section 4 of the Strategy Viability Assessment. In addition to the affordable
- Site Allocation Topic Paper – PfE 2021

housing contribution tested, other planning obligation costs to a total of £1,637,696 were tested for this allocation.

24.11 In terms of transport costs, two types have been modelled. The first are costs found within the site and include roads serving the development, immediate site access and provision for pedestrians and cyclists, where available. For this site this information was provided by the Three Dragons team on the basis of the high-level indicative concept plan and in liaison with the Council’s highways team – Unity Partnership. These on-site transport costs were included in the main viability testing. TfGM then also considered necessary strategic and local interventions / mitigations that may be required. For Chew Brook Vale strategic transport costs of £7,020,000 were tested. Full costings are set out in the allocation’s assumption sheet of the main report.

24.12 Table Five below sets out the results of the viability assessment for the site based on the 2019 GMSF and 2020 GMSF:

Site details			Scheme Results				
Site Ref	Site Name	Scheme Type	Main/ Sensitivity Test	Scheme RV incl land costs	Scheme RV (f less return)	Strategic transport costs	Out-turn scheme RV (g-h)
GM11	Chew Brook Vale (Robert Fletchers)	Housing	Main model	£33,083,000	£19,940,000	£7,020,000	£12,920,000

24.13 The conclusions were:

- The site lies within one of the strongest housing value markets within Greater Manchester and has a residual value of c£20m with the base test. This is sufficient to meet the estimated strategic transport costs of c£7m, leaving a remaining headroom of c£13m.
- The former derelict Robert Fletcher paper mill element of the site will have significant remediation costs associated with it due to contamination from the former use of this part of the site. Detailed information regarding the costs of

remediation is unknown at this point. The viability testing has identified a headroom of nearly £13m which should be available to help meet the cost of remediation.

Strategic Viability Report – Stage 2 Allocated Sites Viability Report - Amended June 2021
Findings

24.14 An updated viability assessment has been carried, based on Policy JP Allocation 15 as proposed in PfE 2021. The findings from this updated assessment are set out in Table Six below.

24.15 As before the testing has only considered the residential elements of the proposals. The addendum has considered the site based on the reduced capacity and site area. The promoters have also provided further information on development costs around decontamination and site preparation, which has significantly increased the cost basis for the testing.

24.16 The site promoters are undertaking further work on floodrisk and which may enable more the of the site to come forward for development. The potential increase in dwellings is unknown at present. As such the addendum has considered three scenarios – the main model based on around 90 homes and two additional sensitivity tests with scenario 1 for 135 homes and scenario 2 for 150 homes.

Table Six: Chew Brook Vale (Robert Fletchers) Strategic Allocation Viability Assessment Results – 2021 Update

Site details			Scheme Results				
Site Ref	Site Name	Scheme Type	Main/ Sensitivity Test	Scheme RV incl land costs	Scheme RV (f less return)	Strategic transport costs	Out-turn scheme RV (g-h)
GM18/ GMA 15	Chew Brook Vale (Robert Fletchers)	Housing	Base	£7,340,000	£1,940,000	£7,020,000	-£5,080,000
GM18/ GMA 15	Chew Brook	Housing	Sensitivity	£14,710,000	£7,160,000	£7,020,000	£140,000

Site details			Scheme Results				
Site Ref	Site Name	Scheme Type	Main/Sensitivity Test	Scheme RV incl land costs	Scheme RV (f less return)	Strategic transport costs	Out-turn scheme RV (g-h)
	Vale (Robert Fletchers)						
GM18/GMA 15	Chew Brook Vale (Robert Fletchers)	Housing	Sensitivity	£17,750,000	£9,300,000	£7,020,000	£2,280,000

24.17 The findings of the addendum are as follows:

- Whilst the site lies within one of the strongest housing value markets within Greater Manchester the Gross Development Value (GDV) with the 99 homes tested is not sufficient to cover the site remediation costs and strategic transport costs.
- Were flood risk concerns overcome and dwelling numbers increased to 135 units then the scheme becomes marginal in viability terms. However, as there is known potential for further costs of remediation, an increase to at least 150 dwellings maybe required to bring the site forward for development (with a residual value of just over £2.2m).

25.0 Phasing

25.1 The phasing and delivery assumptions used to inform the high-level indicative concept plan split the site into development parcels and set out a phasing approach based on known constraints and assumptions around infrastructure delivery. Whilst there have been changes to the site boundary and capacity, and therefore the concept plan work, the phasing and delivery assumptions used to inform the high-level indicative concept plan are still considered relevant and have been used to inform the development trajectory as follows:

- 2026/27 = 20
- 2027/28 = 20
- 2028/29 = 20

- 2029/30 = 20
- 2030/31 = 10

26.0 Indicative Masterplanning

- 26.1 As referred to throughout this report a high-level indicative concept plan and accompanying report has been prepared to inform the allocation as proposed in GMSF 2019 and GMSF 2020, to illustrate how the site may come forward and to demonstrate deliverability and feasibility. It is acknowledged that whilst the requirements and principles set out in Policy JP Allocation 15 will need to be met, the concept plan may change with the preparation of more detailed masterplans and in conjunction with a future developer's planning application.
- 26.2 The allocation boundary and proposed capacity has of course been amended since the high-level indicative concept plan and report were prepared. However, many of the principles and requirements are still considered relevant.
- 26.3 Collectively, the analysis and outcomes have informed a set of strategic design principles developed specifically for the site and:
- An Urban Design Strategy to guide development of the high-level indicative concept plan.
 - A Movement Strategy which considers access, vehicular hierarchy and access, pedestrian movement and public transport provision.
 - Open Space and Landscape Strategy which considers existing water features, hedgerows and trees, openness, key green spaces, SUDs, ecology corridors and green routes.
- 26.4 The high-level indicative concept plan for Chew Brook Vale (Robert Fletchers) has identified key considerations which have continued to help inform preparation of the policy, including:
- The site is in a highly attractive location where an opportunity exists to enhance value by capitalising on the surrounding environment and delivering of a range of house types;
 - The site is topographically challenging in places;

- There are potential heritage issues associated with the existing paper mill; and
- Surrounding highways are constrained and potentially challenges viability.

26.5 Policy JP Allocation 15 requires that any development will need to be in accordance with a comprehensive masterplan and design code for the site agreed by the local planning authority.

26.6 Appendix 2 contains the high-level indicative concept plan for the allocation. The associated high-level indicative concept planning report is available on the GMCA website.

Section F – Conclusion

27.0 The Sustainability Appraisal

- 27.1 As in the 2019 IA, Chew Brook Vale (Robert Fletchers) generally performed positively against the strategic objectives of the plan, with some changes made to scores from since the 2019 IA from neutral to very positive in relation to energy efficiency and resilience of housing stock; positive to very positive in relation to supporting healthier lifestyles; very positive / negative to very positive in relation to green infrastructure and opportunities for recreation, amenity and tranquillity.
- 27.2 No further residual recommendations from the IA are made specifically for the allocation policy as it was considered that when the framework is read as a whole on IA Objectives are addressed. Therefore, no further changes were made to Chew Brook Vale in response to the IA.
- 27.3 An updated IA has been prepared to reflect changes made to strategic allocations since GMSF 2020. The PfE 2021 IA Update concludes that the changes to the policy made in PfE 2021 for Chew Brook Vale (Robert Fletchers) are 'significant' changes to policy for the purposes of the IA due to the allocation boundary amendments. This has fundamentally changed the physical character of the site allocation. These changes have resulted in a much smaller site which is not physically connected to the nearby built form of Greenfield village.
- 27.4 When assessed against the IA Framework, these changes result in a positive effect against Objectives 13 (flooding) and 16 (conserve or enhance landscape or townscape). This is because areas of most significant flood risk were avoided and additional wording added around a development scheme being informed by Historic Environment Assessment. Due to the site being less well physically connected to Greenfield Village, this has resulted in a reduction in scoring from '++' to 'o' against Objectives 3, 7, and 9 (which relate to transport network, social infrastructure and sustainable modes of transport), due to the site's changed position in relation to the nearby Greenfield village. Whilst it is acknowledged that the policy wording recognises the need for enhancements to connectivity, stating a development

should... “Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site”.

27.5 The IA recommends that mitigation includes ensuring accessibility is considered and prioritised when bringing this site forward for development in addition to ensuring transport connectivity is considered and integrated for all sustainable modes of transport.

27.6 More detail on the IA scoring is covered in section 7 of this topic paper.

28.0 The main changes to the Proposed Allocation

28.1 Appendices 1, 5, 6 and show the policy wording in the 2019 GMSF, GMSF Publication Plan Draft for Approval October 2020 and PfE 2021 respectively. Appendices 3 and 4 set out the proposed changes to the policy wording between the 2019 GMSF, GMSF Publication Plan Draft for Approval October 2020 and PfE 2021 for the Chew Brook Vale (Robert Fletchers) allocation and the reasoned justification.

28.2 The main changes are as follows:

- Between 2019 and 2020 the name for the site allocation changed from Robert Fletchers to Chew Brook Vale (Robert Fletchers) to reflect consultation responses, although it is accepted that the site is now restricted to the Robert Fletchers paper mill site.
- Between 2020 and 2021:
 - The allocation boundary has changed to now only include Fletchers Mill complex. This has resulted in the removal of the additional employment floorspace proposed adjacent to Waterside Mill, as this area is now identified as functional floodplain, and the removal of the surrounding greenfield land included within the 2019 and 2020 GMSF and the area that was to be retained as Green Belt which lies between Fletchers Mill complex and Dove Stones Reservoir.

- The site capacity has been reduced from around 170 homes to around 90 homes reflecting the boundary change and site constraints.
- The policy has been amended in relation to access to state that development must provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standard.

28.3 Changes have also been made to reflect evidence and consultation responses such as further ecology surveys, reference to Green Belt enhancement opportunities, high quality design, revised wording in relation to flood risk and improving water quality and reference to duty of care for the Peak District National Park.

28.4 The reasoned justification for the allocation policy has also been amended to provide additional detail and to respond to consultation comments. The main changes include:

- Further text added in relation to affordable housing;
- Reference made to ecosystem opportunity mapping;
- Text added in relation to biodiversity hierarchy and net gain;
- Text added in relation to open space, health, community and education facilities;
- Further text added in relation to heritage; and
- Amended text in relation to flood risk.

28.5 In addition to the changes referred to above there have also been some minor changes made to the policy and reasoned justification relating to references to GM, where this is no longer appropriate, policy references, numbering and other minor typographical errors.

28.6 In terms of the changes between the 2020 GMSF and the 2021 PfE, as these changes were either minor or as a result of Stockport's withdrawal from the plan, it is concluded that the effect of the plan is substantially the same on the districts as the 2020 version of the policy.

28.7 It is considered that these policy changes, along with the other requirements set out in the policy, will deliver a high quality, sustainable development that will help to deliver the vision, plan objectives and overall spatial strategy of PfE.

29.0 Conclusion

- 29.1 Chew Brook Vale (Robert Fletchers) site allocation is within Greenfield and is a gateway location to the Peak District National Park. The allocation comprises Fletchers Mill complex and aims to deliver a mixed-use development consisting of housing and commercial, leisure and retail facilities to support tourism and recreational uses. It is brownfield land in the Green Belt. The site is allocated within the current Oldham Local Plan as a saved 'Major developed site in the Green Belt'.
- 29.2 The allocation meets the Green Belt exceptional circumstances as the allocation is capable of meeting the site selection criteria, which seeks to identify locations for strategic allocations which meet objectives of the plan as a whole, thus meeting the wider strategic case for exceptional circumstances to alter the Green Belt.
- 29.3 The site proposes a range of uses. This includes commercial, leisure and retail facilities to support tourism and leisure facilities of up to 6,000sqm on the Robert Fletchers mill site and around 90 homes with a mix of low-density family and executive homes and affordable housing of 2 and 3 bedroom.
- 29.6 The site area is 5.38 hectares, with a gross developable area of approximately 2.74 hectares and net developable area of 2.19 hectares (through the removal of those areas at risk of flooding).
- 29.7 The development will need to provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standard, however further work at planning application / masterplanning stage will be required. Any development will also need to take into account of and deliver other highway improvements needed so as to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-

quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site.

- 29.8 The HRA has concluded that a site specific HRA is not required as the site is not functionally linked to the South Pennine Moors SPA, however recommendations have been made in the HRA in relation to recreational pressures which will need to be taken into account.
- 29.9 The ecology screening has outlined what ecology surveys will be needed to support a planning application.
- 29.10 There are flood risk constraints. However, further detailed flood risk analysis has been undertaken under the SFRA Level 2 and this concludes that the site is likely to pass the Exception Test, as long as the advice in the Level 2 SFRA is followed and further work, once a layout plan has been finalised, shows the site can remain safe for its lifetime. An FRA, taking account of the SFRA Level 2 recommendations and a drainage strategy is required.
- 29.11 Changes have been made to the Chew Brook Vale (Robert Fletchers) allocation between GMSF 2020 and PfE 2021 that have resulted in the boundaries now only relating to Fletchers Mill complex, in order to reduce the amount of Green Belt release and maximise the use of brownfield land. The changes have been made whilst ensuring that local housing need can still be met and maintaining a reasonable buffer. Oldham is able to continue to meet 100% of its local housing need, that an appropriate buffer to the housing land supply can be identified and a similar proportion of the overall housing requirement can be delivered in Oldham. It is considered that PfE continues to have substantially the same effect on the nine districts that GMSF 2020 did for Greater Manchester.
- 29.12 The full strategic allocation policy wording and reasoned justification is set out in Appendix 1. A full suite of evidence and background papers are available on the GMCA website.

Section G – Appendices

Appendix 1 – Policy JP Allocation 15 Chew Brook Vale (Robert Fletchers), Places for Everyone

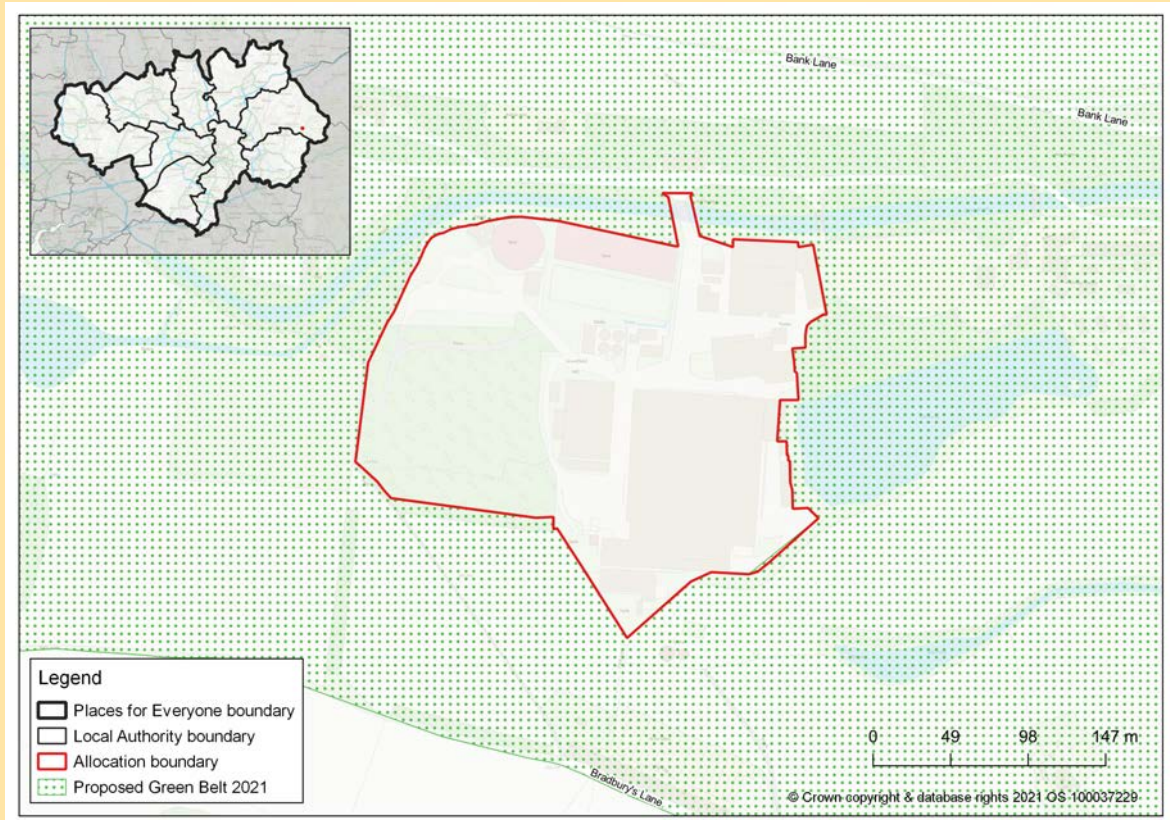
Agency and Local Lead Flood Authority, to develop a wetland catchment area which, as well as being an attractive feature of the site, will allow a strategic approach to flood risk management and provide additional opportunities for upstream flood storage.

- 11.173 Part of the allocation is in within a Source Protection Zone. Any planning applications within this zone are expected to be supported by a detailed hydrological assessment. This will need to consider the vulnerability of the land and to propose suitable mitigation measures which will be employed to reduce the risk of pollution of groundwater.

Chew Brook Vale (Robert Fletcher)

Policy JP Allocation 15

Chew Brook Vale (Robert Fletcher)



Picture 11.26 JPA 15 Chew Brook Vale (Robert Fletcher)

Development at this site will be required to:

1. Be in accordance with a comprehensive masterplan and Design Code agreed by the local authority;

2. Provide a range of commercial, leisure and retail facilities of up to 6,000 sqm, as part of a mix of uses, to support tourism and leisure facilities, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir;
3. Deliver around 90 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements;
4. Provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standards;
5. Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site;
6. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995;
7. Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;
8. Be designed to minimise the landscape impact having regard to the findings and recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Open Moorlands and Enclosed Upland Fringes (Dark Peak);
9. Retain and enhance biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment;
10. Provide further surveys on extended phase 1 habitats, bats and birds to inform any planning application;
11. Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;
12. Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement;
13. Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive;
14. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;

15. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;
16. Provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies;
17. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
18. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health;
19. Be informed by the findings and recommendations of the Historic Environment Assessment (2020) and addendum (2021) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;
20. Ensure high quality design that is environmentally and sustainably driven, including grey harvesting and recycling, maximising energy efficiency through good building design and fuel-efficient technology, a reduction of car usage and household recycling facilities; and
21. Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.

11.174 The site comprises the redundant Robert Fletchers mill complex, which is brownfield land. Given the previous use of the Robert Fletchers site as a paper mill, and its subsequent dereliction, it is considered that the need for remediation will be high contributing to higher viability costs in preparing the site for development.

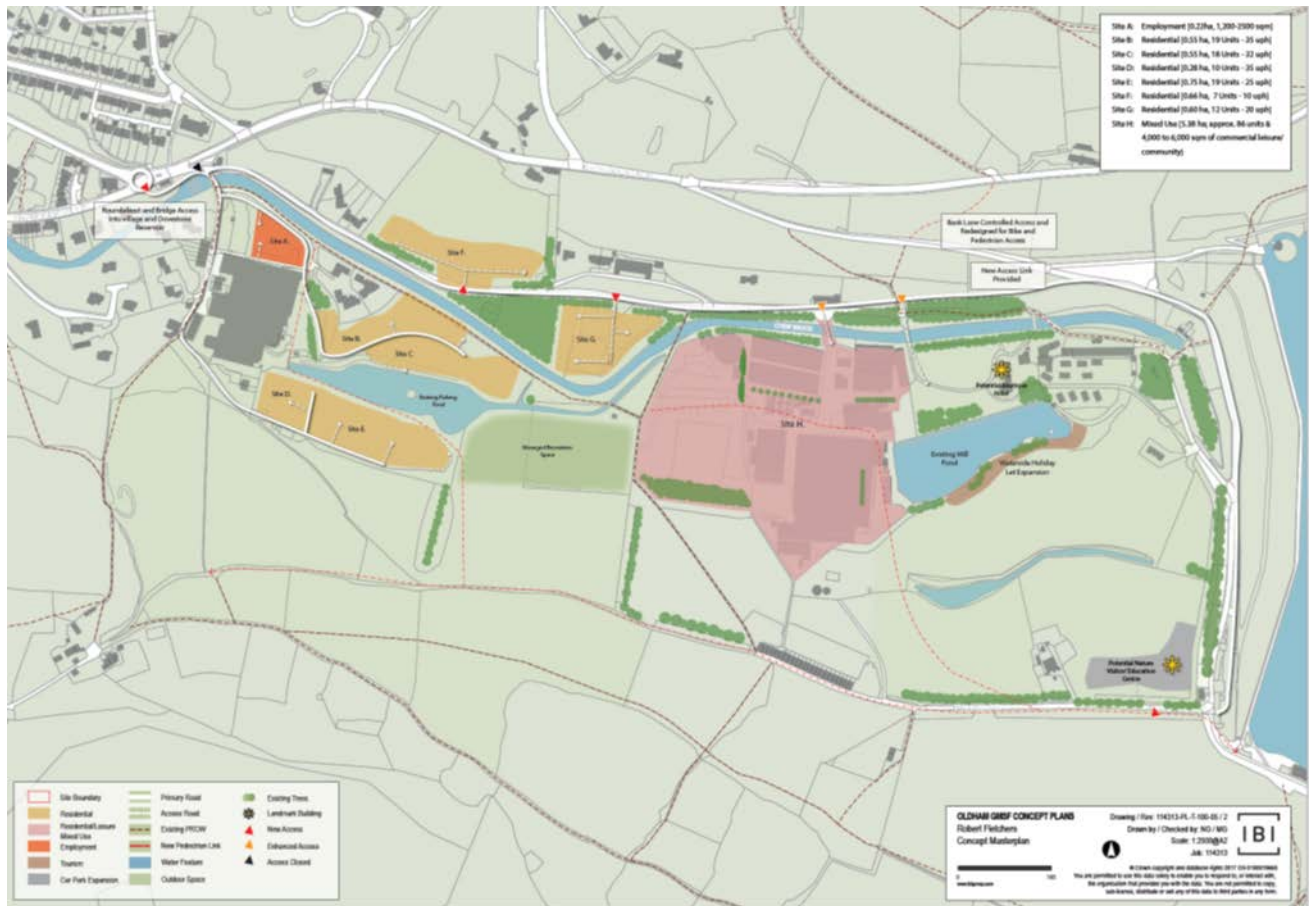
11.175 The site is in a gateway location into the Peak District National Park and presents a strategic and unique opportunity for Oldham and Greater Manchester to achieve complementary tourism and leisure development to enhance the sub-region's visitor and destination offer. The development of the site for leisure and tourism uses will also capture leisure spend in the local economy due to its proximity to the RSPB reserve, Dove Stone Reservoir and the

Saddleworth villages, and create employment opportunities. The tourism and leisure offer should capitalise on, and complement, its location in a way that is sensitive to its unique setting.

- 11.176** The site provides the potential to provide a range of high-quality family and executive homes in an attractive and desirable rural location. It also provides an opportunity to enhance Oldham's housing offer and contribute to meeting Oldham's housing need. Due to the scenic location of the site, it should be an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. There is however also a need for affordable homes across the Saddleworth villages as many residents who wish to remain living within the area cannot currently afford to do so.
- 11.177** Affordable housing will be provided as part of any development of the site, including a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Affordable housing will be delivered in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform the Local Plan affordable housing policy.
- 11.178** Existing access to the site will need to be improved as part of any development, which may include its relocation. This includes the current road from the site, the existing river crossing over Chew Brook from the site to the access road and the access arrangements onto the A669 / A635. Any proposals will need to be agreed by the local highway authority and to adoptable standards.
- 11.179** The policy seeks multi-functional green and blue infrastructure and high levels of landscaping as part of the comprehensive development of the site. This includes the retention and enhancement of existing public rights of way and recreation routes to improve linkages to and from the site to Dove Stone Reservoir, Peak District National Park and the wider countryside.
- 11.180** Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.
- 11.181** Development must follow the legal and policy requirements of protecting irreplaceable habitats and the mitigation hierarchy of doing everything possible to avoid and then minimise the impact on biodiversity, and only then after taking all measures compensate for losses that cannot be avoided. Meaningful biodiversity net gain is then applied on top of this approach.
- 11.182** It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and that any development takes account of the increased demand it may place on existing provision. As such any development would need to provide:
- a. new and/or improvement of existing open space, sport and recreation facilities;
 - b. additional school places through the expansion of existing facilities or provision of new school facilities; and
 - c. provide for appropriate health and community facilities.

- 11.183** These would need to be provided in line with local planning policy requirements and in liaison with the local authority.
- 11.184** Heritage assets play an important role in the area's local historical and cultural identity and distinctiveness. There are undesignated assets throughout the site and a number of other heritage assets within close proximity, including Hey Top Conservation Area and Greenfield House and New Barn Grade II Listed Buildings which lie outside of the strategic allocation boundary. Any development would need to consider the impact on their setting, through the completion of a further Heritage Impact Assessment and having regard to the Historic Environment Assessment (2020) and addendum (2021). Any development proposals should also have regard to the findings and recommendations of the Oldham Mill Strategy. Finally reflecting the sites unique location, the Design Code should ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.
- 11.185** The Greater Manchester Level 2 Strategic Flood Risk Assessment considers the flood risk to the site and provides recommendations that will need to be considered to meet the requirements of the Exception Test. As such, any development would need to follow the sequential approach on site and a flood risk assessment would be required to inform any development, including the recommendations from the Level 2 report. A comprehensive drainage strategy, including a maintenance plan, for the whole site would be required as part of the more detailed masterplanning stage to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Regard should be had to the SUDS guidance set out in the Greater Manchester Level 1 Strategic Flood Risk Assessment and other National Standards (such as CIRIA, Water UK Design and Construction Guidance).

Appendix 2 – High-level indicative concept plan for wider site (as proposed in GMSF 2019 and GMSF 2020)



Appendix 3: Main Changes to the Proposed Chew Brook Vale Allocation Policy (GMSF 2019 compared to GMSF 2020)

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
Robert Fletchers	Chew Brook Vale	Name changes as consultation responses felt that the site name was misleading as the site does not include just the Robert Fletchers site. Revised name suggested by Saddleworth Parish Council and Saddleworth and Lees District Executive.
N/A	Be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority, including phasing arrangements.	Masterplan added to make consistent with other site allocation policies and in response to consultation feedback. Design Code added to comply with NPPF recommendations. Phasing arrangements added to address concerns raised during consultation about delivery of brownfield site.
Deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dovestones Reservoir up to around 6,000 sqm;	Deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities, of up to 6,000 sqm, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir;	Dovestones amended to Dove Stone to reflect correct referencing through site allocation policy. Criterion made more concise.
Provide up to around 2,500 sqm of B1 employment floorspace as an extension to the provision at Waterside Mill, which is to be retained;	N/A	Criterion removed. Extension for employment floorspace not permitted as now shown to be functional floodplain. The existing Waterside Mill will still be retained. This is explained in the reasoned justification to the policy.
Deliver a modest expansion of between 10 to 15 holiday lodges to the existing provision, focused around the existing mill pond sensitive to	N/A	Criterion removed from policy in response to consultation feedback that such developments should be

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
the surrounding countryside and landscape and in line with national policies regarding development in the Green Belt;		<p>treated in line with NPPF policy on Green Belt.</p> <p>The reasoned justification now explains that there are aspirations for a modest expansion to the existing holiday lodge facility through the inclusion of 10 to 15 pods in the eastern section of the site.</p> <p>The eastern half of the site allocation will remain in the Green Belt and any development would be determined in line with relevant national planning policy.</p>
Make provision for a boutique hotel providing a complementary offer to the holiday lodge accommodation;	N/A	<p>Criterion removed from policy in response to consultation feedback that such developments should be treated in line with NPPF policy on Green Belt and other relevant policy.</p> <p>The reasoned justification now explains that there are aspirations for a boutique hotel in the eastern section of the site and there are opportunities for the sustainable re-use and enhancement of Greenfield House, which should be explored.</p> <p>The eastern half of the site allocation will remain in the Green Belt and any development would be determined in line with relevant national planning policy.</p>
Make provision for a visitor education centre linking to the Dovestones Reservoir in partnership with the RSPB	N/A	<p>Criterion removed from policy in response to consultation feedback that such developments should be</p>

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
and United Utilities;		<p>treated in line with NPPF policy on Green Belt and other relevant policy.</p> <p>The reasoned justification now explains that there are aspirations for a visitor education centre linking the reservoir, in partnership with RSPB and United Utilities.</p> <p>The eastern half of the site allocation will remain in the Green Belt and any development would be determined in line with relevant national planning policy.</p>
N/A	Retain a strategic area of Green Belt in the eastern half of the site to maintain separation between the development area and Doves Stone Reservoir and the Peak District National Park;	Wording added to make clear that Green Belt is being retained.
Provide a new access point to the site at Manchester Road, with a spine road into the south western part of the site to the rear of Waterside Mill and linking to and enhancing the existing highway network to the redundant paper mill site and Dovestones Reservoir beyond.	Provide a new access point to the site at off the A669 / A635, including a new bridge structure.	Wording amended for clarification.
Take account of and deliver other highway improvements, including walking, cycling and bus infrastructure improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas including linkages to Dove Stones Reservoir, as well as explore and deliver opportunities for public transport services to and from the site;	Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site;	Reworded for clarification.

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dovestones Reservoir, the Peak District National Park and designated conservation areas;	Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act;	Reference to care for the Peak District National Park under Section 62(2) of the Environment Act added following a response from the Peak District National Park Authority.
Create a green route, as part of the green infrastructure network, along the river/brook, ensuring that development is set back to allow ecological movement;	Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement;	Incorporated into criterion 13.
	Protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve the required objective for the waterbody as proposed under the North West River Basin Management Plan, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment.	Improving water quality referenced as recommended by the Environment Agency consultation response to the GMSF 2019.
Be designed so as to minimise the landscape impact having regard to the findings and recommendations of the GM Landscape Character Assessment for the Unenclosed Uplands and Fringes (Dark Peak) – Shore Edge to Dovestones Reservoir Landscape Character Type;	Be designed to minimise the landscape impact having regard to the findings and recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Open Moorlands and Enclosed Upland Fringes (Dark Peak);	References to landscape type name to reflect final GM Landscape Character Assessment.

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
Retain and enhance areas of biodiversity within and adjoining the site to deliver a clear and measurable net gain in biodiversity and be designed to relate positively to Chew Brook running through the site, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment;	Retain and enhance the hierarchy of biodiversity within the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;	Reference to mitigation hierarchy added. Reference to meaningful net gain in biodiversity added to GM biodiversity work. Reference to Chew Brook moved to criterion 13 and 14 (above).
N/A	Provide further surveys on extended phase 1 habitats, bats, amphibians (including great crested newts), water voles and birds to inform any planning application;	Criterion added to reflect the findings of the Preliminary Ecological Appraisal.
Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC);	Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;	Reference to Habitat Regulations Assessment added to reflect final evidence.
Provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, including the enhancement of the existing playing fields;	Provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies including the enhancement of the existing playing fields;	Local surpluses and deficiencies added for clarity and to comply with local planning policy (Policy 23 Open Space, Sport and Recreation).
N/A	Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;	Reflects Green Belt Stage 2 findings and recommendations of the 'Identification of opportunities to Enhance the Beneficial Use of the Green Belt' report.
	Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification	Reflects Green Belt Stage 2 findings and recommendations of the 'Identification of opportunities to Enhance the

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
	of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;	Beneficial Use of the Green Belt' report.
	Ensure high quality design that is environmentally driven, including the use and water harvesting and recycling, maximum energy efficiency through good building design and fuel-efficient technology, a significant reduction of car usage and household recycling facilities;	Criterion added back in from the 2016 GMSF plan as requested by the Peak District National Park Authority.
Provide for additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;	Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;	Minor word change from provide to contribute, amended for clarity.
Provide for appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health;	Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health;	Minor word change from provide to contribute amended for clarity.
Preserve and enhance heritage assets within, and in the vicinity of, the site and their setting. This includes Hey Top Conservation Area and New Barn and Greenfield House at Greenfield Mill listed buildings. It will also identify and assess the potential impact on other non-designated heritage assets within the site and its setting;	Identify any designated and non-designated heritage assets and assess the potential impact on the assets and their setting, when bringing forward the proposals, through further Heritage Impact Assessments. Development proposals should seek opportunities to secure the sustainable use of Greenfield House, enhancing this asset including its setting. The use of local materials and high level landscaping will be required;	Text amended to not specify which heritage assets should be assessed in further Heritage Impact Assessments. Recommendations from the Historic Environment Assessment for the site allocation embedded. (Other recommendations from the assessment are embedded within other criteria).
Identify any assets of archaeological interest and	Must take into consideration the findings of the Greater	Wording amended as a result of the Historic Environment

Draft 2019 Strategic Allocation Policy	2020 Strategic Allocation Policy	Reason
<p>assess the potential impact on the asset and include appropriate mitigation strategies, which may include controlled investigation; and</p>	<p>Manchester Historic Environment Assessment Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine whether any future evaluation and mitigation will be needed;</p>	<p>Assessment Screening Exercise findings, and in agreement with Historic England.</p>
<p>Be informed by an appropriate flood risk assessment and comprehensive drainage strategy for the whole site and deliver any appropriate recommendations and measures (including mitigation measures and the incorporation of sustainable drainage systems) so as to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network.</p>	<p>Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>Wording amended to reflect SFRA Level 2 and liaison with the Environment Agency and United Utilities.</p>

**Appendix 4: Main Changes to the Proposed Chew Brook Vale Allocation Policy
(GMSF 2020 compared to PfE 2021)**

Draft 2020 Strategic Allocation Policy	2021 Strategic Allocation Policy	Reason
	New site map to be added to show revised site boundary.	Change made to reflect that site now only relates to the Robert Fletchers Mill complex.
Be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority, including phasing arrangements;	Be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority;	Change made to reflect that site now only relates to the Robert Fletchers Mill complex.
Deliver around 170 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements;	Deliver around 90 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements;	Change made to reflect reduced capacity of site. Re-order of criterions.
Deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities, of up to 6,000 sqm, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir;	Provide a range of commercial, leisure and retail facilities of up to 6,000sqm, as part of a mix of uses, to support tourism and leisure facilities connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir;	Change made to reflect that site now only relates to the Robert Fletchers Mill complex.
Retain a strategic area of Green Belt in the eastern half of the site to maintain separation between the development area and Doves Stone Reservoir and the Peak District National Park;	Text deleted.	Change made as criterion no longer required now that allocation relates only to the Robert Fletchers Mill complex.
Provide a new access point to the site at the A669 / A635, including a new bridge structure;	Provide an improved access off the A669 / A635 and improve the existing access road up to the mill complex, including the river crossing over Chew Brook, up to adoptable standard;	Change made to reflect access arrangements needed now allocation only relates to Robert Fletchers.
Be informed by, and deliver the recommendations of, an	Be informed by, and deliver the recommendations of, an	Change made to add date.

Draft 2020 Strategic Allocation Policy	2021 Strategic Allocation Policy	Reason
appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act;	appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act 1995;	
Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, hedgerows, and habitat areas, and mill / fishing ponds, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas;	Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, and habitat areas, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas surrounding the site;	Change made to reflect that allocation now only relates to the Robert Fletchers Mill complex.
Retain and enhance the hierarchy of biodiversity within the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;	Retain and enhance biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;	Change made as reference to hierarchy no longer necessary now that allocation only relates to mill complete and 'adjoining' missed out of policy from the 2019 Draft Plan.
Protect and enhance the habitats and corridor along	Provide for opportunities to protect and enhance the	Change made to reflect wording used elsewhere in

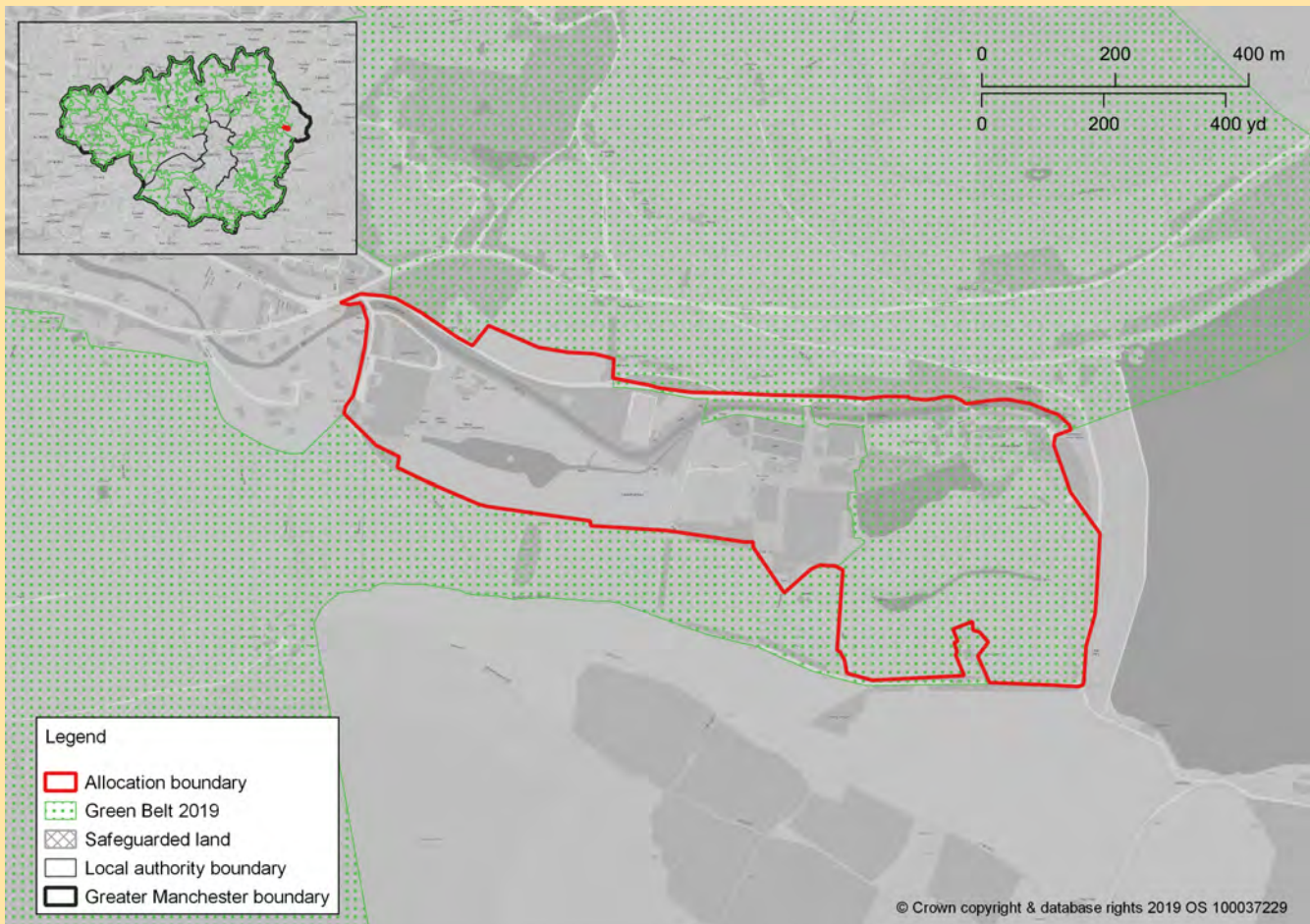
Draft 2020 Strategic Allocation Policy	2021 Strategic Allocation Policy	Reason
Chew Brook to improve the existing water quality and seek to achieve the required objective for the waterbody as proposed under the North West River Basin Management Plan, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment;	habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive;	similar criterion wording and to reflect comments made by EA on the 2019 GMSF.
Provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies including the enhancement of the existing playing fields;	Provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies;	Change made as enhancement of playing fields no longer appropriate to include now that the site only relates to the Robert Fletchers Mill complex;
<p>Identify any designated and non-designated heritage assets and assess the potential impact on the assets and their setting, when bringing forward the proposals, through further Heritage Impact Assessments. Development proposals should seek opportunities to secure the sustainable use of Greenfield House, enhancing this asset including its setting. The use of local materials and high level landscaping will be required.</p> <p>Must take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine whether any future evaluation and mitigation will be needed;</p>	Be informed by the findings and recommendations of the Historic Environment Assessment (2020) and addendum (2021) in the Plan's evidence base and any updated Heritage Impact Assessment submitted as part of the planning application process. An up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed;	<p>Amended text suggested by Historic England.</p> <p>Criterion relating to the provision of an up-to-date archaeological desk-based assessment subsequently deleted.</p>
Ensure high quality design that is environmentally driven, including the use and water	Ensure high quality design that is environmentally and sustainably driven, including	Changes made to incorporate missing words and to reflect

Draft 2020 Strategic Allocation Policy	2021 Strategic Allocation Policy	Reason
<p>harvesting and recycling, maximum energy efficiency through good building design and fuel-efficient technology, a significant reduction of car usage and household recycling Facilities; and</p>	<p>grey water harvesting and recycling, maximising energy efficiency through good building design and fuel-efficient technology, a reduction of car usage and household recycling facilities; and</p>	<p>that site now only relates to the Robert Fletchers Mill complex.</p>
<p>Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.</p>	<p>No change.</p>

Appendix 5: GMSF 2019 Policy wording

Policy GM Allocation 18

Robert Fletchers



Development at this site will be required to:

1. Deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dovestones Reservoir up to around 6,000 sqm;
2. Deliver around 170 homes with a mix of low density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements;
3. Provide up to around 2,500 sqm of B1 employment floorspace as an extension to the provision at Waterside Mill, which is to be retained;
4. Deliver a modest expansion of between 10 to 15 holiday lodges to the existing provision, focused around the existing mill pond sensitive to the surrounding countryside and landscape and in line with national policies regarding development in the Green Belt;

5. Make provision for a boutique hotel providing a complementary offer to the holiday lodge accommodation;
6. Make provision for a visitor education centre linking to the Dovestones Reservoir in partnership with the RSPB and United Utilities;
7. Provide a new access point to the site at Manchester Road, with a spine road into the south western part of the site to the rear of Waterside Mill and linking to and enhancing the existing highway network to the redundant paper mill site and Dovestones Reservoir beyond.
8. Take account of and deliver other highway improvements, including walking, cycling and bus infrastructure improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas, including linkages to Dovestones Reservoir, as well as explore and deliver opportunities for public transport services to and from the site;
9. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dovestones Reservoir, the Peak District National Park and designated conservation areas;
10. Incorporate multi-functional green and blue infrastructure and high levels of landscaping so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, hedgerows, habitat areas and mill / fishing ponds, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas;
11. Create a green route, as part of the green infrastructure network, along the river/brook, ensuring that development is set back to allow ecological movement;
12. Be designed so as to minimise the landscape impact having regard to the findings and recommendations of the GM Landscape Character Assessment for the Unenclosed Uplands and Fringes (Dark Peak) – Shore Edge to Dovestones Reservoir Landscape Character Type;
13. Retain and enhance areas of biodiversity within and adjoining the site to deliver a clear and measurable net gain in biodiversity and be designed to relate positively to Chew Brook running through the site, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment;
14. Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC);
15. Provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, including the enhancement of the existing playing fields;
16. Provide for additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
17. Provide for appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health;

18. Preserve and enhance heritage assets within, and in the vicinity of, the site and their setting. This includes Hey Top Conservation Area and New Barn and Greenfield House at Greenfield Mill listed buildings. It will also identify and assess the potential impact on other non-designated heritage assets within the site and its setting;
19. Identify any assets of archaeological interest and assess the potential impact on the asset and include appropriate mitigation strategies, which may include controlled investigation; and
20. Be informed by an appropriate flood risk assessment and comprehensive drainage strategy for the whole site and deliver any appropriate recommendations and measures (including mitigation measures and the incorporation of sustainable drainage systems) so as to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network.

- 11.128** The site includes the redundant Robert Fletchers mill complex, which is brownfield land. Land to the west up to Waterside Mill is greenfield land and has been included within the wider 'Robert Fletchers' site to enable the brownfield land to come forward for development.
- 11.129** It is a gateway location into the Peak District National Park and presents a strategic and unique opportunity for Oldham and Greater Manchester for complementary tourism and leisure development to enhance visitor and destination offer within the sub-region. The development of the site for leisure and tourism uses will also capture leisure spend in the local economy due to its close proximity to the RSPB reserve Dovestones Reservoir and the Saddleworth villages and create employment opportunities. The tourism and leisure offer should capitalise on, and complement its location in a way that is sensitive to its unique setting.
- 11.130** Due to its proximity to Dovestones Reservoir, the eastern section of the site, proposes a modest expansion to the existing holiday lodge facility and boutique hotel, shall remain within the Green Belt, reflecting its sensitive location and landscape setting. Any development within this area will therefore need to come forward in line with national planning policy on Green Belt.
- 11.131** The site provides the potential to provide a range of high quality family and executive homes in an attractive and desirable rural location. It also provides an opportunity to enhance Oldham's housing offer and contribute to meeting Oldham's housing need. Due to the scenic location of the site, it should be an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. There is however also a need for affordable homes across the Saddleworth villages as many residents who wish to remain living within the area cannot currently afford to do so. Affordable homes must therefore be provided as part of the wider development of the area, in line with the local planning policy requirements.

- 11.132** The policy seeks multi-functional green and blue infrastructure and high levels of landscaping as part of the comprehensive development of the site. This includes the retention and enhancement of existing public rights of way and recreation routes so as to improve linkages to and from the site to Dovestones Reservoir, Peak District National park and the wider countryside.
- 11.133** Heritage assets play an important role in the area's local historical and cultural identity and distinctiveness. There are two Grade II listed buildings within the site – Greenfield House at Greenfield Mill and New Barn. Heytop Conservation Area lies just outside of the strategic allocation boundary. There are also a number of locally listed buildings and structures throughout the site. Any development would need to consider the impact on their setting, through the completion of a Heritage Impact Assessment.
- 11.134** Following the line of Chew Brook part of the site falls within Flood Zone 3 as such any development would need to follow the sequential approach and a flood risk assessment would be required to inform any development. A comprehensive drainage strategy for the site as a whole would also be required as part of the more detailed masterplanning stage to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Question 97

Do you agree with the proposed policy GM Allocation 18: Robert Fletchers?

Agree / Mostly agree / Neither agree or disagree / Mostly disagree / Disagree

What is the reason for your answer?

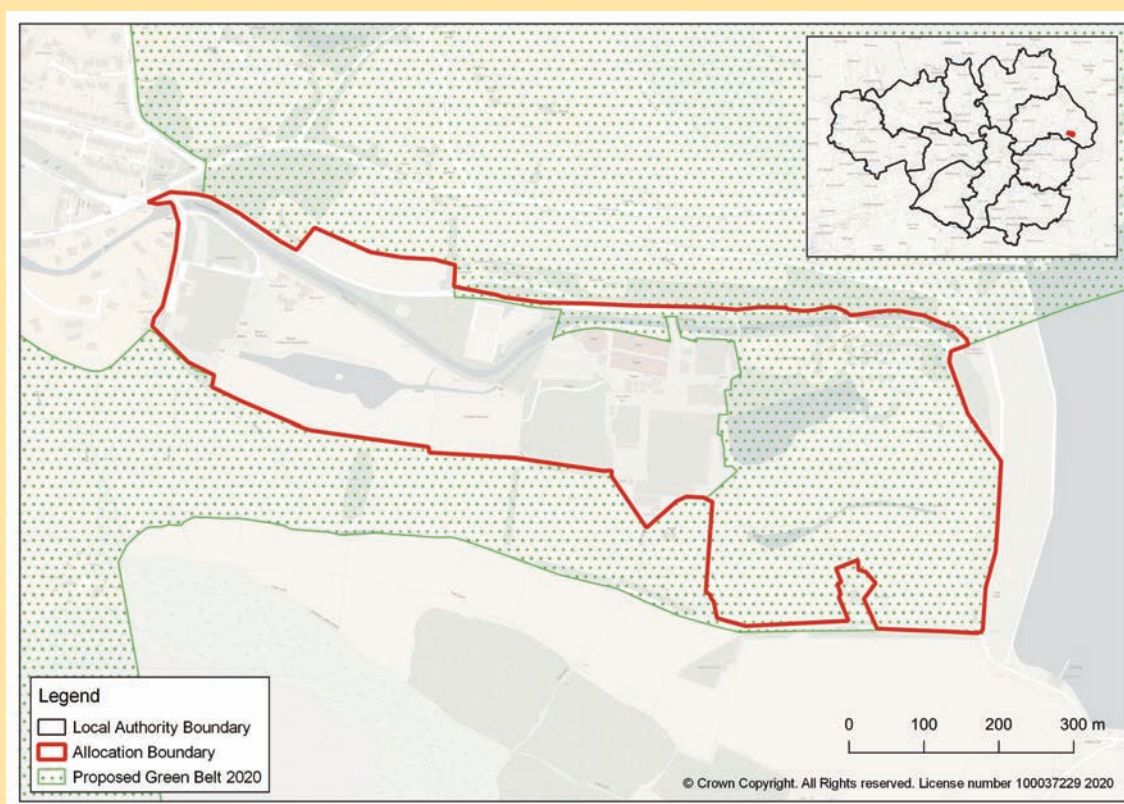
Appendix 6: GMSF 2020 Map and Policy Wording for the Chew Brook Vale (Robert Fletcher's) Allocation

11.170 Part of the allocation is in within a Source Protection Zone. Any planning applications within this zone are expected to be supported by a detailed hydrological assessment. This will need to consider the vulnerability of the land and to propose suitable mitigation measures which will be employed to reduce the risk of pollution of groundwater.

Chew Brook Vale (Robert Fletchers)

Policy GM Allocation 15

Chew Brook Vale (Robert Fletchers)



Picture 11.25 GMA 15 Chew Brook Vale (Robert Fletchers)

Development at this site will be required to:

1. Be in accordance with a comprehensive masterplan and Design Code agreed by the local authority, including phasing arrangements;
2. Deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities, of up to 6,000 sqm, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir;
3. Deliver around 170 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements;

4. Retain a strategic area of Green Belt in the eastern half of the site to maintain separation between the development area and Doves Stone Reservoir and the Peak District National Park;
5. Provide a new access point to the site at off the A669 / A635, including a new bridge structure;
6. Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site;
7. Be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act;
8. Incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, hedgerows, habitat areas and mill / fishing ponds, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas;
9. Be designed to minimise the landscape impact having regard to the findings and recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Open Moorlands and Enclosed Upland Fringes (Dark Peak);
10. Retain and enhance the hierarchy of biodiversity within the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;
11. Provide a Habitat Regulations Assessment and further surveys on extended phase 1 habitats, bats, amphibians (including great crested newts), water voles and birds to inform any planning application;
12. Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered;
13. Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement;
14. Protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve the required objective for the waterbody as proposed under the North West River Basin Management Plan, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment;
15. Have regard to the findings of the Stage 2 Greater Manchester Green Belt Study, including mitigation measures to mitigate harm to the Green Belt;

16. Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;
17. Provide for new and/or the improvement of existing open space, sport and recreation facilities commensurate with the demand generated in line with local planning policy requirements, and local surpluses and deficiencies including the enhancement of the existing playing fields;
18. Contribute to additional school places to meet the increased demand that will be placed on existing primary and secondary school provision within the area, either through an expansion of existing facilities or through the provision of new school facilities in liaison with the local education authority;
19. Contribute to appropriate health and community facilities to meet the increased demand that will be placed on existing provision in liaison with the local authority and Public Health;
20. Identify any designated and non-designated heritage assets and assess the potential impact on the assets and their setting, when bringing forward the proposals, through further Heritage Impact Assessments. Development proposals should seek opportunities to secure the sustainable use of Greenfield House, enhancing this asset including its setting. The use of local materials and high level landscaping will be required;
21. Must take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise, and provide an up-to-date archaeological desk-based assessment to determine whether any future evaluation and mitigation will be needed;
22. Ensure high quality design that is environmentally driven, including the use and water harvesting and recycling, maximum energy efficiency through good building design and fuel-efficient technology, a significant reduction of car usage and household recycling facilities; and
23. Be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Level 2 Strategic Flood Risk Assessment Site Summary Report, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe over its lifetime and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. Proposals should be integrated as part of the multi-functional green infrastructure network and opportunities to use natural flood management and highway SUDs features should be explored.

11.171 The site includes the redundant Robert Fletchers mill complex, which is brownfield land. Land to the west up to Waterside Mill is greenfield land and has been included as part of the Chew Brook Vale site. Given the previous use of the Robert Fletchers site as a paper mill, and its subsequent dereliction, it is considered that the need for remediation will be high contributing to higher viability costs in preparing the site for development.

- 11.172** It is a gateway location into the Peak District National Park and presents a strategic and unique opportunity for Oldham and Greater Manchester to achieve complementary tourism and leisure development to enhance the sub-region’s visitor and destination offer. The development of the site for leisure and tourism uses will also capture leisure spend in the local economy due to its proximity to the RSPB reserve, Dove Stone Reservoir and the Saddleworth villages, and create employment opportunities. The tourism and leisure offer should capitalise on, and complement, its location in a way that is sensitive to its unique setting.
- 11.173** Reflecting the site’s proximity to Dove Stone Reservoir, there are aspirations for the following uses in the eastern section of the site - a modest expansion to the existing holiday lodge facility through the inclusion of 10 to 15 pods, a boutique hotel and a visitor education centre linking to the reservoir, in partnership with the RSPB and United Utilities. Opportunities for the sustainable re-use and enhancement of Greenfield House, including its setting, should be explored. This eastern section of the site would remain in the Green Belt and any development within this area would be determined in line with relevant national planning policy.
- 11.174** The site provides the potential to provide a range of high-quality family and executive homes in an attractive and desirable rural location. It also provides an opportunity to enhance Oldham’s housing offer and contribute to meeting Oldham’s housing need. Due to the scenic location of the site, it should be an attractive location for larger and bespoke housing, providing a distinctive offer to the borough’s housing market. There is however also a need for affordable homes across the Saddleworth villages as many residents who wish to remain living within the area cannot currently afford to do so. Affordable homes must therefore be provided as part of the wider development of the area, in line with local planning policy requirements.
- 11.175** Affordable housing will be provided as part of any development of the site, including a range of tenures, house sizes and types, in order to meet the needs of residents as appropriate. Affordable housing will be delivered in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform the Local Plan affordable housing policy.
- 11.176** The policy seeks multi-functional green and blue infrastructure and high levels of landscaping as part of the comprehensive development of the site. This includes the retention and enhancement of existing public rights of way and recreation routes to improve linkages to and from the site to Dove Stone Reservoir, Peak District National Park and the wider countryside.
- 11.177** Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.
- 11.178** Protecting and enhancing biodiversity must follow the biodiversity hierarchy of international, national and local designated sites and the mitigation hierarchy of doing everything possible to avoid and then minimise the impact on biodiversity, and only then after taking all measures

compensate for losses that cannot be avoided. Measurable biodiversity net gain is then applied on top of this approach. If biodiversity net gain cannot be achieved on-site then offsite contributions will be required.

- 11.179** It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and that any development takes account of the increased demand it may place on existing provision. As such any development would need to provide:
- a. new and/or improvement of existing open space, sport and recreation facilities;
 - b. additional school places through the expansion of existing facilities or new provision of new school facilities; and
 - c. provide for appropriate health and community facilities.
- 11.180** These would need to be provided in line with local planning policy requirements and in liaison with the local authority.
- 11.181** Heritage assets play an important role in the area's local historical and cultural identity and distinctiveness. There is one Grade II listed building within the site – Greenfield House at Greenfield Mill. It is hoped that the development of the site presents an opportunity to provide for a sustainable use of Greenfield House that will enhance this asset and its setting and views from Hey Top. Hey Top Conservation Area and New Barn lies just outside of the strategic allocation boundary. There are also undesignated assets throughout the site and a number of other heritage assets within close proximity. Any development would need to consider the impact on their setting, through the completion of a further Heritage Impact Assessment. Any development proposals should have regard to the findings and recommendations of the Oldham Mill Strategy. Reflecting the sites unique location, the Design Code should ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.
- 11.182** The Greater Manchester Level 2 Strategic Flood Risk Assessment considers the flood risk to the site and provides recommendations that will need to be considered to meet the requirements of the Exception Test. As such, any development would need to follow the sequential approach on site and a flood risk assessment would be required to inform any development, including the recommendations from the Level 2 report. A comprehensive drainage strategy for the whole site would be required as part of the more detailed masterplanning stage to ensure that undue pressure and burden is not placed on existing utilities infrastructure through piecemeal and uncoordinated development. Regard should be had to the SUDS guidance set out in the Greater Manchester Level 1 Strategic Flood Risk Assessment and other National Standards (such as CIRIA, Water UK Design and Construction Guidance). Proposals should apply greenfield run off rates and be supported by a maintenance plan.

Appendix 7: Call for Sites falling within Area of Search OL-AS-10

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
1452676167803	Land off Park Lane / Steadway, Boarshurst, Greenfield	Site is within Area of Search OL-AS-10. Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	100% greenfield land in the Green Belt. Not considered suitable for allocation due it being relatively small in size and of insufficient scale to make a significant contribution towards delivering balanced and inclusive growth and achieving the overall vision, objectives and spatial strategy, including boosting the competitiveness of the northern areas and addressing housing need. It was therefore not considered suitable for inclusion as a strategic allocation.
1455705332935	Bowling Green	Site is within Area of Search OL-AS-10 and within GMSF 2019 allocation GM Allocation 18	Site is within Area of Search OL-AS-10 and within GMSF 2020 allocation GM Allocation 15	Site is within Area of Search OL-AS-10 and is not proposed for allocation in PFE 2021	100% greenfield land in the Green Belt. Part of site fell within the Chew Brook Vale (Robert Fletchers) proposed strategic allocation in GMSF 2019 (Policy GM Allocation 18). This part of the allocation has now been removed as part of PfE 2021 as it is not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) A change to the local housing need and plan period has resulted in some flexibility within supply to further reduce Green Belt release

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
					whilst still being able to deliver the vision, plan objectives and overall spatial strategy as well as maintaining a reasonable buffer.
1455706479051	Cog Hole	Site is within Area of Search OL-AS-10 Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	Site is 100% greenfield land in the Green Belt. Not considered suitable for allocation due it being small in size (0.63ha) and of insufficient scale to make a significant contribution towards delivering balanced and inclusive growth and achieving the overall vision, objectives and spatial strategy, including boosting the competitiveness of the northern areas and addressing housing need. It was therefore not considered suitable for inclusion as a strategic allocation.
1455708344846	Greenfield Farm	Site is within Area of Search OL-AS-10 and within GMSF 2019 allocation GM Allocation 18	Site is within Area of Search OL-AS-10 and is not within GMSF 2020	No Change from 2020	100% greenfield land in the Green Belt. Part of site fell within the Chew Brook Vale (Robert Fletchers) proposed strategic allocation in GMSF 2019 (Policy GM Allocation 18). It is not considered suitable for the following reasons: 1) it's proximity to the Peak District National park and 2) it is considered that it would lead to over development of the site.
1455710257675	Ley Butts	Site is within Area of Search OL-AS-10 and	Site is within Area of Search OL-AS-10 and	Site is within Area of Search OL-AS-10	100% greenfield land in the Green Belt. Part of site fell within the

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
		within GMSF 2019 allocation GM Allocation 18	within GMSF 2020 allocation GM Allocation 15	and is not proposed for allocation in draft PfE 2021	Chew Brook Vale (Robert Fletchers) proposed strategic allocation in GMSF 2019 (Policy GM Allocation 18). This part of the allocation has now been removed as part of PfE 2021 as it is not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) A change to the local housing need and plan period has resulted in some flexibility within supply to further reduce Green Belt release whilst still being able to deliver the vision, plan objectives and overall spatial strategy as well as maintaining a reasonable buffer.
1460127522419	Parkside	Site is within Area of Search OL-AS-10. Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	The is majority greenfield land (81.82%) in the Green Belt. Not considered suitable for allocation due it being relatively small in size (0.55ha) and of insufficient scale to make a significant contribution towards delivering balanced and inclusive growth and achieving the overall vision, objectives and spatial strategy, including boosting the competitiveness of the northern areas and addressing housing need. It was therefore not considered suitable for inclusion as a strategic allocation.

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
1477549147972	Land between tunstead lane and hollins lane	Site is within Area of Search OL-AS-10. Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	The site is majority greenfield land (94.81%) in the Green Belt. Not considered suitable for allocation as there is sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1483617443781	Hollyville Golf Course, Greenfield - Site A	Site is within Area of Search OL-AS-10. Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	The site is majority greenfield land (99.21%) in the Green Belt. Not considered suitable for allocation as there is sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1483623338409	Hollyville Golf Course, Greenfield - Part B	Site is within Area of Search OL-AS-10 Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	The site is majority greenfield (96.66%) in Green Belt. Not considered suitable for allocation as there is sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.
1483625097466	Front Land, Hollyville, Greenfield	Site is within Area of Search OL-AS-10 Not proposed for allocation in the draft GMSF 2019	No Change from 2019	No Change from 2019	The site is majority greenfield land (99.19%) in the Green Belt. Not considered suitable for allocation as there is sufficient housing land supply identified to deliver the vision, plan objectives and overall spatial strategy whilst maintaining a reasonable buffer.

Call for Site ID	Site Name	Status in GMSF 2019	Status in GMSF 2020	Status in PfE 2021	Reason for not allocating
1624523343005	Land at Waterside Mill	Site is within Area of Search OL-AS-10 and within GMSF 2019 allocation GM Allocation 18	Site is within Area of Search OL-AS-10 and within GMSF 2020 allocation GM Allocation 15	Site is within Area of Search OL-AS-10 and is not proposed for allocation in draft PfE 2021	Part of site fell within the Chew Brook Vale (Robert Fletchers) proposed strategic allocation in GMSF 2019 (Policy GM Allocation 18). This part of the allocation has now been removed as part of PfE 2021 as it is not considered suitable for the following reasons: 1) it is considered that it would lead to over development; and 2) A change to the local housing need and plan period has resulted in some flexibility within supply to further reduce Green Belt release whilst still being able to deliver the vision, plan objectives and overall spatial strategy as well as maintaining a reasonable buffer.

Section H – Bibliography

PfE2021 and all supporting documents referred to within this topic paper and listed below can be found at (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>)

Concept Planning

- Oldham GMSF Concept Plan and Report – Chew Brook Vale (Robert Fletchers) - IBI Group, Amion and JLL on behalf Oldham Council, 2018

Environment

- Preliminary Ecological Appraisals – Areas being considered for allocation for future development within the Greater Manchester Spatial Framework in Oldham; GMEU; June 2020
- Preliminary Ecological Appraisals – Areas being considered for allocation for future development within the Greater Manchester Spatial Framework in Oldham - Addendum; GMEU; June 2021
- Greater Manchester Landscape Character and Sensitivity Assessment – Land Use Consultants (LUC), September 2018
- Habitat Regulations Assessment of the Greater Manchester Spatial Framework – Greater Manchester Ecology Unit (GMEU), October 2020

Flooding

- Level 1 Strategic Flood Risk Assessment for Greater Manchester – Update; JBA Consulting; March 2019

Green Belt

- Stage 1 Greater Manchester Green Belt Assessment: LUC; 2016
- Stage 1 Greater Manchester Green Belt Assessment – Appendices; LUC; 2016
- Stage 2 GM Green Belt Study - Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions; LUC; 2020
- Stage 2 Greater Manchester Green Belt Study: Assessment of Proposed 2019 GMSF Allocations; LUC; September 2020
- Stage 2 Greater Manchester Green Belt Study - Assessment of Proposed 2019 Allocations - Appendix B; LUC; 2020

- Stage 2 GM Green Belt Study - Addendum: Assessment of Proposed GMSF Allocations; LUC; 2020
- Stage 2 GM Green Belt Study - Contribution Assessment of Proposed 2020 GMSF Green Belt Additions; LUC; 2020
- Identification of Opportunities to Enhance the Beneficial Use of the Green Belt – Land Use Consultants; LUC; September 2020

Historic Environment

- Historic Environment Assessment Screening Exercise - Greater Manchester Archaeology Advisory Service (GMAAS), February 2020
- Historic Environment Assessment for Places for Everyone: Oldham Allocations; Oldham Council; June 2021
- Historic Environment Assessment for Places for Everyone: Oldham Allocations - Addendum; Oldham Council; June 2021

Integrated Assessment

- Integrated Assessment of the Greater Manchester Spatial Framework - Arup & Greater Manchester Combined Authority, January 2019
- Integrated Assessment of the Greater Manchester Spatial Framework – IA of 2020 draft GMSF Consultation Document; GMCA / ARUP; October 2020

Plan versions

- Greater Manchester's Plan for Homes, Jobs and the Environment – Greater Manchester Spatial Framework (GMSF) Revised Draft; GMCA; January 2019 (GMSF 2019)
- Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework Publication Plan 2020 – Draft for Approval; GMCA; October 2020 (GMSF 2020)

Site Selection

- Greater Manchester's Plan for Homes, Jobs and the Environment – Site Selection Process Background Paper; GMCA

Transport

- Transport Locality Assessments – Introductory Note and Assessments – Oldham Allocations - Beal Valley; Systra; November 2020

Viability

- Greater Manchester Spatial Framework Strategic Viability Report – Stage 2 Allocated Sites Viability Report; Three Dragons, Ward Williams Associates, Troy Planning + Design (on behalf of GMCA); October 2020
- Greater Manchester Spatial Framework Strategic Viability Report – Stage 2 Allocated Sites Viability Report - Amended; Three Dragons, Ward Williams Associates, Troy Planning + Design (on behalf of GMCA); June 2021

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