

**REPORT TO SADDLEWORTH PARISH COUNCIL**

**25<sup>TH</sup> FEBRUARY 2019**

**GREATER MANCHESTER SPATIAL FRAMEWORK 2019**

**GM ALLOCATION 18 - ROBERT FLETCHER'S, GREENFIELD**

**SUGGESTED COMMENTS**

**INTRODUCTION**

Consultation is currently underway on the Revised Draft of the Greater Manchester Spatial Framework (GMSF). Comments need to be submitted by 18<sup>th</sup> March.

The main issue for consideration is the allocation for development of land at and adjacent to Fletcher's Mill. This proposal appeared in the 2016 version of GMSF but has changed significantly in the latest plan. These changes may, to a degree, be a consequence of co-ordinated representations made by the Parish Council and the Peak Park, and, of course, comments made by local residents. This report suggests how the Parish Council might respond to the current proposals for this site.

It should be noted that the latest version of GMSF proposes that some areas of land should be added to the Green Belt. In Saddleworth there are four such areas:-

- Dacres, Greenfield
- Land behind Denshaw Village Hall
- Stoneswood, Delph
- Wall Hill, Dobcross

It is assumed that the Saddleworth Parish Council will wish to welcome these additions.

**POLICY GM ALLOCATION 18 - ROBERT FLETCHER'S –SUGGESTED COMMENTS**

It is recommended that the Parish Council should make the following comments.

Saddleworth Parish Council (SPC) welcomes the significant changes which have been made to this proposal since the 2016 version of GMSF.

Specifically

- It believes that the proposed Green Belt boundary is now much more appropriate.
- It welcomes the reduction in the number of holiday lodges, the tighter definition of the location of the holiday lodges, and the statement that any proposal for holiday lodges in this location must be in line with national policies regarding development in the Green Belt.
- It supports the proposal that a part of the Allocation should be developed for a mixture of uses, but also believes that this part of the proposal needs to be written with greater clarity in order to

ensure that this Allocation will be developed in a manner which creates a “sustainable place” in accordance with Policy GM – E1 and other relevant policies.

### Suggested Changes to Policy GM Allocation 18

SPC suggests the following changes to the Policy GM Allocation 18. The purpose of these changes is to give greater clarity and precision, and thus make it more likely that the eventual development will comply with the thematic policies of the GMSF and the specific objectives of this Allocation.

1	<p>The SPC suggests that the name of the Allocation should be changed so that it does not refer to just one of the ownerships within the allocation. The use of “Robert Fletchers” leads to a confusion about whether wording refers to the whole allocation, all the land within the allocation owned by the owners of the former paper mill, or just the area occupied by the former paper mill known as “Robert Fletcher’s Mill”. A name for the allocation which reflects local geography or historic place names would be helpful in reducing this confusion. (Possibilities include “Chew Brook” or “Chew Brook Vale”)</p>
2	<p>The SPC believes very strongly that a new first requirement of the Policy should be included. This would stipulate that development at this site will be required to <i>“Be in accordance with a comprehensive masterplan agreed by the local authority”</i>. Paragraph 11.9 of GMSF explains the reasons why some allocations will need a masterplan. Many allocations, including several in Oldham, have this requirement attached. GM Allocation 18 is a site with many complicating factors. It is located in an exceptional landscape forming a key gateway to the Peak District National Park. Development of the highest quality is needed. One of many reasons why this is essential is so that the site can play a role in adding to the diversity and quality of Oldham and Greater Manchester’s housing offer. This is one of the main justifications for the identification of this site as a GM Allocation (paragraph 11.131). SPC recognises that a start has been made with the preparation of a “Concept Plan” by IBI Consultants. This is a very helpful first step, but a much more detailed masterplan is needed as guidance to prospective developers, and will need to reflect emerging and evolving information on many local issues such as biodiversity, heritage and archaeological assets, tourism visitor management, highways design, and infrastructure issues. Paragraph 11.134 within the supporting text for GM Allocation 18 refers to the need for a “detailed master planning stage” to avoid the drainage issues which could otherwise arise from “piecemeal and uncoordinated development”. The SPC believes this is one of many reasons why a detailed masterplan is necessary.</p>
3	<p>The introduction of the masterplan requirement would change the numbering of the other requirements of the policy. The new numbers are bracketed in the following suggestions.</p>
4	<p>The SPC welcomes the idea of a part of the Allocation being used to create a mixed use development but feels that, for greater clarity, Requirement 1(2) should be reworded to read:- <i>“Deliver a mixed use area on the site of the former paper mill that will provide a range of housing with a diversity of sizes and designs and also provide a range of commercial, leisure and retail facilities connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dovestone Reservoir. The commercial, leisure and</i></p>

	<p><i>retail facilities could, in total, amount to up to around 6000 sqm.”</i></p> <p>The supporting text might read:-</p> <p>“The proposal is that the development of this Allocation will create a “sustainable place” (Policy GM-E1) appropriate to Saddleworth and its position immediately adjoining and overlooked from the Peak District National Park, and through which the Park is entered. In particular, the mixed use scheme on the former paper mill area should create a very attractive place to live, but one where people will also work, and others will visit as tourists – for day visits and longer stays. By providing facilities for visitors which are currently lacking, it will increase and widen the attraction of the Dovestone area, whilst also boosting the local economy. The concept is one of integration of living, tourism and work to create a vibrant community of the type found elsewhere in Saddleworth, and in many parts of the Peak Park, the Dales and the Lake District.”</p>
5	<p>For clarity, the requirement 2(3) could then be changed to <i>“on land at the paper mill together with other areas of the Allocation to the west of the paper mill deliver around X* homes of low density family housing and executive homes together with affordable homes of 2 and 3 bedrooms, in line with local planning requirements. Some higher density housing may be appropriate on the site of the former paper mill as a part of the mixed uses on that part of the allocation.”</i></p> <p>Supporting text should explain why low densities would be appropriate on some parts of the allocation (e.g. areas of dense tree cover) whilst higher densities could be appropriate on the former paper mill site in order to create a genuine community.</p> <p>The mix of types of housing should be determined at the master planning stage and decisions about this issue will be informed by evidence about housing need in Saddleworth.</p> <p>*See comment 6 below</p>
6	<p>SPC is very doubtful whether any development scheme could both comply with requirements 10 to 15 (11 to 16) and 18 to 20 (19 to 21) included in the policy for this Allocation and deliver around 170 homes (some at low density for sound policy reasons), and the commercial, leisure, retail and B1 employment space which is also specified in the policy. The 2016 proposal was for 120 homes. The SPC in its comments on that iteration of GMSF suggested that a revised scheme with modified boundaries, a mix of uses, and some areas of higher residential density on the former paper mill site, would still be able to accommodate 120 homes. The current draft Allocation has a very similar boundary to that suggested by SPC and the same mix of land uses. The SPC still believes that a total of around 120 homes represents a realistic estimate of the number that can be accommodated in a high quality scheme. It feels that the IBI Concept Plan probably overstates the capacity of some of the housing sites to the west of the paper mill, given the factors affecting those sites (e.g. the amount of important tree cover on Area G; the biodiversity considerations around the area of water known as Tanners Pond. A more accurate estimate of numbers will be possible when a detailed masterplan is prepared which takes account of the environmental constraints upon housing density in some parts of the Allocation.</p>
7	<p>The SPC feels that the issue of vehicular access will be one of the most challenging issues to be addressed in moving forward this Allocation.</p>

	<p>The design of the access system will need very careful consideration at the masterplanning stage. The Concept Plan which has been prepared by IBI includes some indicative suggestions but the SPC is far from convinced that these will provide an acceptable solution. The challenge is, of course, to meet the needs of the new development whilst also handling the pressure of tourist visitor traffic in a way which is safe and meets environmental objectives.</p> <p>The IBI Concept Plan includes a new link from the mill drive to Banks Lane which crosses a steep and heavily wooded slope before meeting Banks Lane at an acute angle. It seems inevitable that this will be a considerable engineering operation with a major impact on the landscape, on important tree cover and on biodiversity at the primary point of entry to this part of the National Park. It also appears that it would create a conflict between traffic generated by the new development and the heavy tourist traffic on a part of Banks Road which already becomes very congested.</p> <p>SPC feels that a satisfactory access system will need to be informed by a Visitor Management Strategy for Dovestone and be based on the principle of the separation of residential and commercial traffic within the Allocation from tourist car traffic wishing to access Dovestone. The potential role of public transport also needs to be explored at the masterplanning stage. It is possible that an extension of the recently introduced inter village bus service could link the development sites within the Allocation and the Dovestone tourist area to other bus and rail connections and to tourism attractions, shopping and employment destinations across Saddleworth and beyond.</p> <p>Until this broader access study is undertaken it is not possible to assess whether elements of the indicative road access system shown in the Concept Plan, such as the new arrangement near the Clarence Public House, are workable and can be designed so that they are not detrimental to the character of the area and the village setting. It is possible that the challenges posed by designing the road access system may limit the amount of residential, commercial, leisure and retail development that can be accommodated within the Allocation</p>
8	<p>The SPC welcomes the very significant reduction in the number of holiday lodges but believes that the policy would be much clearer if it referred to the total number of lodges which will be permitted on the site, rather than just referring to an “additional” number. This would remove uncertainty about how lodges which have planning permission but are not at this date in place are to be treated in the calculations.</p>
9	<p>The SPC welcomes the concept of a “boutique hotel”, but recognises that this is, in planning terms, an undefined concept. SPC would suggest that this type of hotel would normally have a quite limited number of bedrooms and would be special in character, often because it involves the adaptation of a historic building. The Concept Plan for this Allocation indicates that Greenfield House might be the location for this hotel and SPC agrees that this would be suitable. However the policy requirement does not refer to this location. SPC believes that the wording of the policy requirement should be strengthened to give greater certainty that a hotel development will be “boutique” in nature. It would suggest that three sentences are added to the policy requirement. <i>“The hotel should have no more than 12 bedrooms and should be created by the adaptation and reuse of an existing building of architectural merit. Any extension to the building</i></p>

	<p><i>should be sympathetic to the existing building and its setting in terms of the scale and design of the extension. If the building is within the Green Belt the development must be in line with national policies regarding development in the Green Belt.</i></p>
10	<p>One of the “clear principles” of GMSF is a “brownfield first” approach. GM Allocation 18 proposes housing on greenfield land currently designated as Green Belt and on the brownfield site of the former paper mill which is at the moment categorised as a Major Developed Site in the Green Belt. Since the mill closed a number of developments have taken place on nearby land in the same ownership but the paper mill has become derelict, unused for development. Policy GM Allocation 18 intends that the paper mill site is used to provide a very high quality mixed use scheme within which a major proportion of the housing within this Allocation will be located. It is the paper mill scheme which will play the major role in creating a “sustainable place” and providing the facilities which will enhance the attractiveness of the area for tourists and boost the local tourism economy. It is essential that the development of the paper mill site should be substantially completed at an early stage of the overall development of this Allocation.</p> <p>The SPC therefore suggests that an additional requirement should be added to the Policy. This could read:-</p> <p><i>“No development should take place on land within the Allocation between the existing mill drive and Chew Brook or to the north of the existing mill drive until at least 60 homes and a minimum of 3000sqm of floorspace for commercial, retail or leisure use have been completed on the site of the former paper mill. These areas of land will be defined in the detailed masterplan for this Allocation”</i></p> <p>A policy of this type should be worded so that it serves two purposes:-</p> <ul style="list-style-type: none"> <li>• Ensuring that brownfield land within the Allocation does not remain undeveloped whilst the greenfield areas are developed; and</li> <li>• Ensuring that the former paper mill site is developed as a genuinely mixed use area with a defined minimum amount of commercial, leisure and retail floorspace being created by a specified point in the overall development timetable. Otherwise it is possible that only a token provision of commercial, leisure and retail facilities will be made.</li> </ul>
11	<p>The eastern part of the Allocation is currently in the Green Belt and would remain so under Policy GM Allocation 18. The only developments which are proposed within the Green Belt area are tourism and leisure uses. The Visitor Education Centre is at the south eastern extremity of the Allocation. This may possibly be provided on an alternative site and would need to be justified against Green Belt policy whether or not it is in the Allocation area. The SPC has found that the red line boundary of the Allocation as currently placed has given rise to misconceptions and scepticism about the proposals in Policy GM Allocation 18, and comments which can be summarised as “the thin end of the wedge”. SPC would suggest that the red line boundary be redrawn on an alignment whereby the Allocation excludes all the fields which are to remain undeveloped and the Visitor Education Centre, but includes the location of the boutique hotel and also</p>

defines the extent of the area which could be used to provide the site for the additional holiday lodges. It believes that this would increase the level of public understanding of, and support for, GM Allocation 18.

Proposers of a Visitor Education Centre would still have the opportunity to make a planning case for the facility in Green Belt terms just as they would need to if it was within the Allocation.