



Stonebreaks Development Statement of Case

1 November 2022

Prepared by LS / Reviewed by PJM

Benefits of the Scheme

1. New homes provided to reduce Oldhams shortfall in housing provision in an area with historically low delivery. Claimed supply is currently at 4 years against a target of 5 years meaning the presumption in favour of development should apply.
2. 20% Affordable Homes (32) on site – much needed in Saddleworth, an area with an undeniable shortfall.
3. 8.5 Acres of Open Space provided onsite, to be made up of typologies that are currently deficient in the area
4. Strategic reallocation of OPOL – 12 Acres – which accounts for the true assessment of the sites characteristics including areas currently outside of the allocation.
5. Accessible open space increased by 366%. On site and provides accessible links to important areas of Springhead, such as Knowsley Junior School, Wood Brook countryside, the high street, for use by all of the community.
6. Development of a Brownfield / Previously Developed Land site that is identified as suitable for housing.

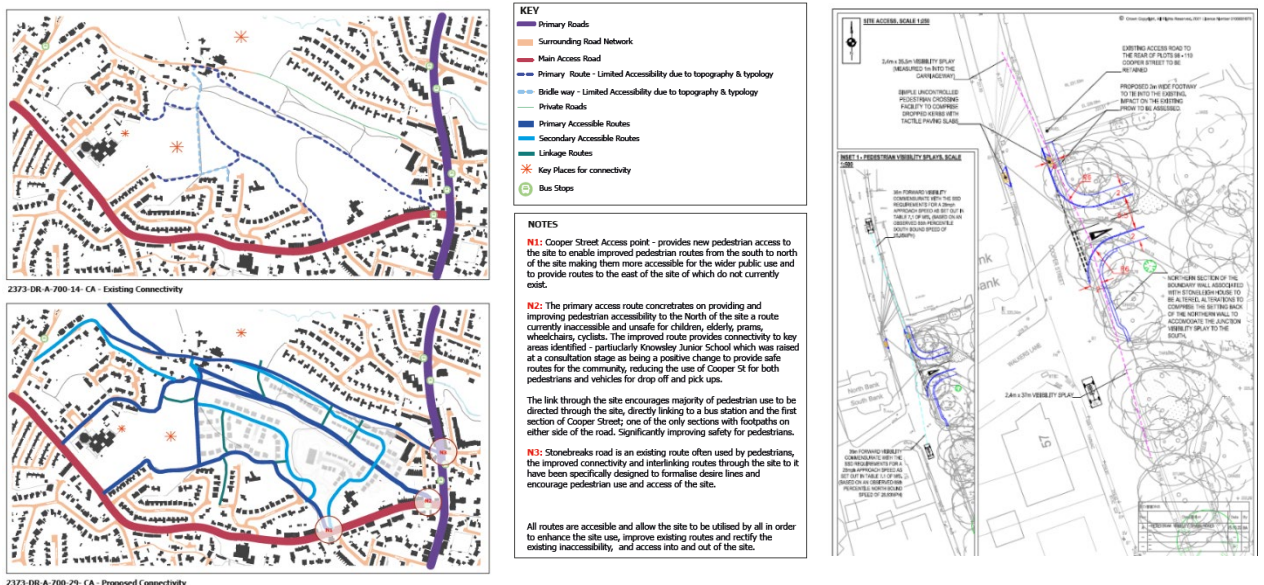
OPOL

1. Given the clear shortfall in the supply of housing, Policy 22 is considered out of date and should be afforded less weight in the determination of this application in accordance with Paragraph 11 of the NPPF.
2. Oldham's assessment of the reasons for OPOL designation, do not align with the detailed assessments provided by the applicant.
3. The applicant has proposed a redesignation of the OPOL land, allowing for a designation that is made up of the true features of the site evidenced by landscaping and ecology assessments.
4. The proposal seeks to include important features of the site, such as the quarry walls which currently sit outside of the OPOL designation.
5. The current OPOL land is not accessible by all members of the community due to it's limited accessible pathways and PROWs. The aim is to increase the use of the site, and make a substantial positive qualitative change to the land.

6. The quarry development has been stalled due to viability, the Quarry which is a PDL Brownfield site, cannot be built without the support of housing within the OPOL land.
7. The applicant feels the number of benefits for the scheme outweigh the loss of 40% of OPOL and believe in the importance of **quality over quantity**;
 - a. The shortfall in housing land supply
 - b. The significant benefits that can only be achieved through the development of the land – increased accessibility and land available for use by community.
 - c. The considered redesignation of OPOL
 - d. Provision of affordable housing
 - e. Provision of open space typologies that are deficient in the area

Highways

1. The reason for refusal from highways was received on the 18th of October, determining that pedestrian safety was compromised due to existing Cooper St road / pavements.
2. Firstly: The proposed development alleviates use of pedestrian access via Cooper St, and encourages use through the site, through the new proposed network of pathways that have been taken from improved PROW's and formalised desire lines. Image provided to show the comparison of pedestrian network and accessibility.
3. Secondly: Since receiving comments the visibility of the proposed improvements to the pavements at the Highfield house access point has been reviewed and the consultants have determined it to be acceptable, contrary to OMBC's consultants who have not provided evidence to justify the refusal.
4. Given the late receipt of the refusal from highways, there has been no opportunity to discuss the reason and evidence provided by the applicant to remove the objection prior to the committee.
5. It has been acknowledged that the issue is resolvable however given the timescales it has not been resolvable before committee, through no fault of the applicant which has meant they have been at a severe disadvantage.



Ecology

1. Ecological assessments have demonstrated there is a conflict of interest between ecology and OPOL.
2. The applicant has tried to achieve a balance throughout the application between this conflict.
3. Refusal reason was given on 24th October giving the applicant no time to respond.
4. Confirmation of where and how many units GMEU would like to see the scheme reduced by has still not been provided although a vague comment has been received stating it would be areas to retain scrubland on the top of the site and areas within the quarry.
5. The applicant would have made the changes required to remove the objection however have not been given the opportunity to do so.
6. If the applicant had been provided with time to amend the scheme, a full run of houses would have been removed on the plateau area to retain scrubland and semi-improved grasslands. The applicant would be minded to retain the units within the quarry to achieve the balance between policy and ecology.
7. The changes would have further improved the landscaping, particularly of the ridge line of which is noted to be of most susceptible impact.
8. The applicant feels it is only fair to allow committee to see these changes prior to making the decision, given they were not allowed the time to make these changes formally. Below is the sketch.



Conclusion

1. On the forced withdrawal of the outline application by the council, the applicants only had a single reason for refusal to resolve – OPOL.
2. Despite significant efforts and acknowledgement from the authority that the scheme has improved, the applicant finds themselves in a position with 2 additional refusal reasons, that were never previously raised as part of the detailed pre-application or within the previous application and that have been provided not within the consultation period, resulting in an inability to resolve the reasons for the applicant.

'It is acknowledged that the amended scheme and supporting evidence is a reflection of whole scale changes which have resulted in a much improved scheme to that previously submitted.'

The greatest challenge remains the fact that the site is partly designated as OPOL. It is acknowledged that you have prepared a thorough justification in support of a relaxation, however as you are aware Officers within Policy and DM are of the view that development on the OPOL site should be resisted It is and my understanding that having considered this feedback that you have made further changes to the proposal and invested substantially more effort in to preparing additional information regarding the various viewpoints into and out of the site and details of features being retained. These amendments and additional information will need to be assessed as part of the application.'

3. The applicant wishes for the decision made against them to be a fair and realistic assessment of the site, that accounts for the efforts that have been made on an extremely challenging site are acknowledged and the position is understood.
4. Should there have been time for the applicant to submit the reduced scheme further benefits would have included:
 - a. A further 5% retention of OPOL, the remaining allocation totalling 13 Acres out of the existing 20 with a substantial improvement to its quality.
 - b. For loss of only 35% of OPOL the land could become usable for all with areas of open space including a 60 metre green corridor through the site.
 - c. 1.6 Acres of this new allocation would be provided within the sites boundary in areas that are currently not allocated but have been assessed as qualifying areas, demonstrating the lack of understanding of the site.
 - d. Retained areas of mixed ecology habitats, including; semi-improved grasslands, scrubland, acid grassland and dry heath. To maintain the sites mixed ecology and habitats for birds with a central linking corridor.