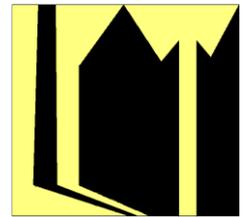


# Littleborough Civic Trust

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Dear Mr.Copestake,

I am writing on behalf of Littleborough Civic Trust.

This is a formal objection to the joint proposals submitted by Homes England and Vistry Partnerships Ltd.

The Civic Trust have been in contact with Homes England since their involvement with this site and have exchanged correspondence on a regular basis.

Whenever possible documents have been released to us by H.E. which were not in the public domain and reciprocally we have advised the Development Manager, Josh Casey, of our concerns regarding the longstanding problems with the application site.

When Vistry were appointed as the preferred developers we were also introduced at an early stage as representatives of the local community.

This is well documented.

When the planning application was officially published we were aghast to discover the contents of the "Site Investigation Review" conducted by Eastwood & Partners and included in their letter to Vistry dated the 21st May, 2021.

Suffice to say that the map on page 13 of 14 of that report indicates the whole site is ingrained with asbestos and this is specifically referred to.

There are numerous references in the "Gap Analysis Report", provided to the Trust by H.E. and conducted by their own consultants RSK, to the lack of information regarding asbestos removal from the site.

Planning Application 11/D55085 for this site was granted on the understanding that asbestos had been removed and disposed of safely and 200mm of clean crushed stone placed on top of a geotextile marker layer across the whole site with the exceptions of the roadways and cells 4 and 6.

Obviously this has not been carried out in accordance with the requirements to provide a clean surface.

Not only are we concerned about the details not having been released until recently but also that individuals may have been exposed to asbestos contamination since 2011.

We are given to understand that the pre application advice meeting took place on the 25th May 2021 between John Copestake/Daniela Ripa and Jill Thwaite (Development Manager, Vistry). Exactly what was discussed we do not know however the presence of asbestos on the whole site was not revealed to the Trust at our "on site" meeting with the developer and two architects on the 9th June 2021 when the question of contamination was briefly discussed. The Trust informed the developers that we were aware that remediation had taken place to industry standards and that the concerns of contamination via the Source-Pathway-Receptor linkage had been removed. Clearly this is not true but of more significance is that we were not advised at that time.

Having had the opportunity to re-examine all the documentation relating to the site it is abundantly evident that the failure to remove the asbestos has been known by H.E./Vistry and RSK since the 14th August 2020 and in all probability by H.E. since 2017.

The Akzo site is probably one of the most contentious brownfield sites in the North West and we have constantly been told by Councillors that "Just because it is contaminated doesn't mean it can't be built on". We will argue that point as there are other major concerns regarding the site and the lack of infrastructure.

The question of poor stewardship of the public purse is one which we consider must be addressed.

The fact that H.E. are prepared to "take a hit on the land value", due to the contamination/remediation constraints, is one which should be made public and which developers have continually argued makes the site not viable for housing. The Littleborough Town Design Statement (LTDS), recently acknowledged publicly by Mark Robinson, Assistant Director of Economy, to carry weight as a Supplementary Planning Document, is not being adhered to in that the developers wish to build out most of the site in artificial stone and grey tiles rather than natural stone and slate.(Pages 52 and 53 LTDS, Design Checklist : A) Building Materials and Finishes)

The close proximity to the Council's "jewel in the Crown" i.e. Hollingworth Lake Country Park , is very relevant from a design perspective and a Pennine Village setting which is threatened by continual house building of types not required in Littleborough but being forced upon the local population by the wishes of individuals who profess to know what the future requires!

Anyone who knows the locality already has experience of the gridlock situations and traffic queues frequently occurring in Littleborough.

The daily commute is a nightmare and the B6225, Hollingworth Road, which must be kept clear, is a motorway diversion route. The suggestion that traffic has decreased since 2011 is one which the local population will readily dispute and computer modelling and future traffic projection figures have been proven to be inaccurate in the past. The cost to correct mistakes having fallen upon RMBC.

The Transport Assessment and the Addendum submitted with the application fail to comply with the TRICS Good Practice Guide (GPG), 2021.

There are no references to the "Comment Boxes" included on the data base and the Trust, as a third party, therefore requests that the Consultants revisit the individual site data and include the necessary information, in accordance with the guidance given in the GPG. (Page 12 of 65 Para.5.3).

The 10 sites included in the Transport Addendum(originally 11) should be closely examined using the facility of "Google Maps" to confirm whether or not they are compatible to the application site. (Page 10 of 65 Para.4.12)

The Trust has done this exercise and shared the findings with H.E. and it is obvious that each of the 10 selected sites in the TA are just not comparable to the application site. It is unfortunate the TRICS have recently changed the access to their dataset so that only licence holders can view the individual site details, however, the Trust have all the details relating to the 10 sites and the "Comment Boxes" and notes of the surrounding access roads and speed limits, parking restrictions, No Entry signs, Weight Limits, types and ages of developments etc. which apply. The consultant's comments are awaited.

Having previously been advised by the Chief Planning Officer, Paul Moore, that "TRICS is the industry standard and that is the end of the matter" then the Trust will not accept that statement and suggest that the potential Trip Rates supplied by the Highways Forecasting Analytical Services of Transport for Greater Manchester (HFAS) have far more relevance and accuracy. Figures supplied by HFAS for the incorrectly named "Committed Development" of the Taylor Wimpey site included in the TA are much higher than the TRICS data suggest but as HFAS are not the statutory consultee then the RMBC's Highways Department would appear to have ignored their findings.

It is ironic that the road junction statistics in the TA do rely on figures provided by TfGM.

It is not disputed by RMBC's Highways Department that the junctions of Todmorden Road, Church Street, Halifax Road and Canal Street all operate above capacity without any further development. The location of Hollingworth Lake has a significant impact on these roads and due to the presence of the Railway Viaduct, the Canal, the River Roch and Eales Brook then no amount off-site contributions to highways improvements will remove the ever present traffic congestion. There are a number of errors within the TA regarding location names and their orientation.

The Health Impact assessment Report has misleading information regarding the number of doctors accepting new patients. It is correct to state that the four surgeries do accept new patients, the fact is they have no alternative as they are not allowed to "close their books".

Birch Hill Hospital is not open to patients in general, all that remains is a residential trauma unit and a psychiatric department.

This report needs amending.

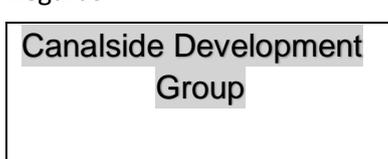
The Trust has serious concerns regarding the failure of RMBC's planning department to publish comments made by the public on the web site despite the fact that this does not breach GDP Regulations with minimal redactions.

There are 19 objections listed of which the Trust has obtained 16 by a specific request made to Daniel Ripa, Network Development Manager. We do not consider this is good practice as the general public are under the impression that the Akzo Nobel site has already received planning approval and do not appreciate that the current application (21/01146/FUL) will not take account of any comments previously submitted.

We look forward to your response to our objections and comments and expect the contents of this e-mail to be made available to the Planning and Licensing Committee.

Finally, for your information, we have already been in contact with the Environment Agency regarding the failure to remove asbestos from the site and the possibility of those responsible being held to account.

Regards



Registered Charity No. 1174714