

MAYBERN

PLANNING + DEVELOPMENT

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National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

REF: TR010064

24th September 2024

Dear Sir/Madam,

REPRESENTATION: M60/M62/M66 Simister Island Interchange Project, National Highways

On behalf of Adam Winthrop MRICS FAAV (acting for Messers Massey), Maybern Planning and Development Limited ('Maybern') wishes to object to the National Infrastructure Project at M60/M62/M66 Simister Island, specifically in relation to the proposed attenuation pond that has been designated for land to the south of Griffie Lane, Bury.

The Attenuation Pond proposed lies within the south-west of Messers Massey land holding (referenced GM782300, title plan appended **APPENDIX 1**). National Highways sets out their intention to permanently acquire the south-western area of land under this title, as well as a temporary possession of an irregular shaped section of land in such a way that this juts into the centre of the land holding.

Adam Winthrop MRICS FAAV wishes to be considered as an interested party in the ongoing examination, due to their clients' interest in the land proposed to be included in the Order.

It is considered that National Highways has failed to robustly justify the proposed location for the attenuation pond proposed to the east of the M66, immediately east of the school playing fields which are located south of Griffie Lane (see *Land Use Plan Sheet 4 of 5 Drawing Number HE548642-JAC-GEN-STK-DR-ZH-0006*).

The entire land holding within title referenced GM782300 is allocated for mixed use development in the recently adopted statutory development plan 'Places for Everyone' (2024). The allocation being referenced JPA1.1, Northern Gateway Heywood / Pilsworth. This follows a significant period of consultation and preparation work for the development plan document, in which the relevant land was determined appropriate for allocation to meet the future housing needs of the Borough. The proposed Order and works, both temporary and permanent, jeopardise entirely the development of land (title GM782300) in that the attenuation pond will not only lead to permanent loss of developable land but also the temporary possession will impact upon the imminent masterplanning exercise which is being carried out for the wider allocation (with neighbouring landowners).

Were the Order to proceed in this form, compensation to the full residential value would be sought and it is clear that the level of compensation claim will be far higher than other available agricultural

/ unallocated / green belt land in the locality, and it is as such unclear how National Highway can justify this approach from the economic standpoint. The applicant has as such failed to demonstrate best value.

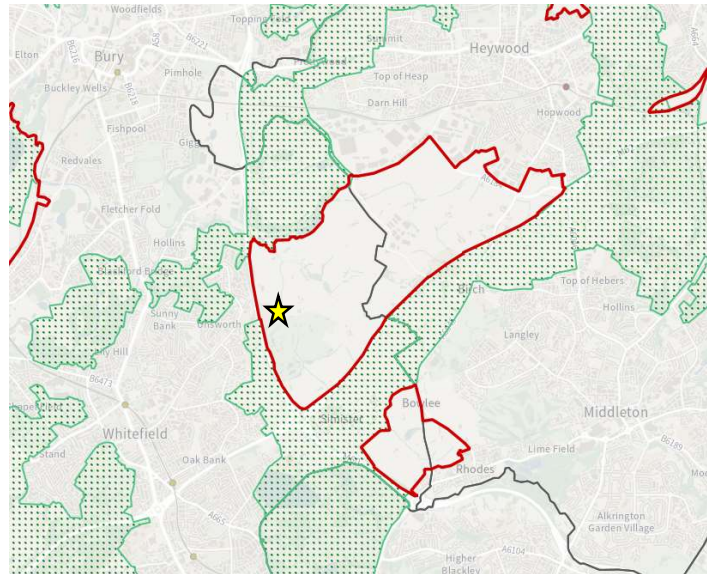


Figure 2: Extract from Places for Everyone proposals map (2024). Approximate location of relevant land holding is identified with yellow star, added by Maybern

The Inspector is requested to consider the lack of robust evidence that a full assessment of alternative locations for this attenuation pond has been undertaken. Land immediately to the south of the playing fields or land to the immediate north of the strategic allocation offer locations closer to the M62/M66 itself (thereby negating the need for easements across land to the motorway, as is proposed), and also offer the opportunity to reduce the impact on developable land. While the burden to carry out such a sequential assessment of alternative locations does not fall on my client, it is the case that the applicant here has failed to explore this to the full extent.

My client may make further representations and may present additional evidence at a later stage accordingly.

Yours sincerely,

Katie Delaney
Director
For and behalf of Maybern Planning and Development

Appendix 1

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

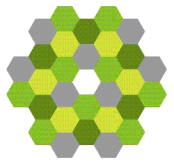
This official copy is issued on 12 January 2023 shows the state of this title plan on 12 January 2023 at 08:38:56. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by the HM Land Registry, Fylde Office .

HM Land Registry

Official copy of title plan

Title number **GM782300**
Ordnance Survey map reference **SD8207SW**
Scale **1:2500**
Administrative area **Greater Manchester :**
Bury



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