



Historic England

FAO the Planning Inspectors of the Places for Everyone
Plan
C/O Programme Officers Helen Wilson and Yvonne
Parker

Our ref:
Your ref:

Telephone: 0191 403 1657

23 January 2023

Dear Sir and Madam,

Places for Everyone Proposed Modifications

We are writing to you with regards proposed modifications that have been put forward on 16th and 20th January by the GMCA for the site allocations within the Places for Everyone Plan. We have become aware of these changes through our own regular review of new publicly available evidence and information on the Examination website.

We have a number of serious concerns regarding the modifications put forward and would welcome the opportunity to discuss these at a future hearing session. Unfortunately given the timing of the changes put forward we were not able to attend the hearing sessions last week and have only just become aware of the changes to be discussed at this week's hearing sessions. Had we been aware of these changes with sufficient notice we would have attended these sessions in order to put forward our own argument as to why it is important to include the criteria currently being proposed for deletion by the GMCA.

Furthermore, we were unaware that these modifications would be put forward by the GMCA at the time we entered into the Statement of Common Ground in December 2022. Therefore, the Statement of Common Ground makes no reference to these proposed changes, should we have been aware we would have stressed our concerns.

The content of the modifications proposed by the GMCA could have a potentially harmful impact on the historic environment where development of an allocation site may either directly affect the significance of a heritage asset or have an indirect impact on its setting. As such the changes proposed by the GMCA likely change our position from one of support for some of the allocations proposed in the plan to one of objection. We disagree with the argument that the criteria is unnecessary and avoids duplication. Indeed, the GMCA's own hearing statements for a number of the allocations stipulate why such criteria is important.



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The site allocations where modifications put forward by the GMCA on 16th January could have a harmful impact on the historic environment include:

- JPA1.1 Heywood/Pilsworth (Northern Gateway)
- JPA1.2 Simister and Bowlee
- JPA3.2 Timperley Wedge

The site allocations where modifications put forward by the GMCA on 20th January could have a harmful impact on the historic environment include:

- JPA7 Elton Reservoir
- JPA9 Walshaw
- JPA12 Beal Valley
- JPA13 Bottom Field Farm (Woodhouses)
- JPA14 Broadbent Moss
- JPA16 Cowlshaw
- JPA17 land South of Coal Pit Lane (Ashton Road)
- JPA18 (South of Rosary Road)
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In addition, we recognise that modifications are being put forward on a weekly basis in relation to the sites being discussed for that particular week. Therefore, should further modifications be put forward for those sites to be discussed during hearing weeks 7-10 reflect those already published for weeks 5 and 6, then Historic England would likely have additional objections to these sites.

We understand the urgency of this matter given the hearing sessions are in progress and look forward to hearing from you at your earliest opportunity.

Yours sincerely,

MR HENRY CUMBERS

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