

<b>Family Name</b>	Costello
<b>Given Name</b>	Conor
<b>Person ID</b>	1287215
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Costello
<b>Given Name</b>	Conor
<b>Person ID</b>	1287215
<b>Title</b>	JPA 2: Stakehill
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>First of all I would like to say that I cannot believe that I am having to give my objections yet again. Fundementally, the places for everyone (PFE) plan is a different plan entirely from the GMSF plan as it relates to JPA2: Stakehill and as such has not been confirmed whether it complies with regulation 18 of the Town and Country Planning Regulations, and so should not proceed to final public consultation and submission under regulation 19 as PFE legality is not established.</p> <p>Furthermore this new process and language employed has become more technical and convoluted, no doubt in an effort to bamboozle and confuse those people unaccustomed to the due processes and how they should take place. It makes the whole plan less transparent.</p> <p>However, the points below will highlight how this new PFE plan lacks legal compliance, is unsound, unjustified, ineffective and overall ill-concieved.</p> <p>* No rationale is given for the increase in housing from 900 to 1600 between old GMSF paln and new PFE plan</p> <p>* Slattocks / stakehill has around 1000 homes currently, with a natural population growth of 6.2%, only 60 new homes would be required over the period of the plan</p> <p>* The all-in-one garden centre was not included in the previous GMSF plan and is now included in this. This is a significant deviation from the previous plan.</p> <p>* The current infrastructure is inadequate:</p> <ol style="list-style-type: none"> <li>1. Schools are at maximum capacity already</li> <li>2. It"s impossible to get a GP appointment</li> <li>3. A temporary school has been built on Hopwood Hall College grounds to help cope with current incapacity of local schools</li> </ol>

4. Flooding onto Grange Road, Church Road and Rochdale Road has increased over the last few years and there have been no efforts to counteract it - the last event was 11/01/21 and I have photos and videos
5. Adding 1600 houses will put significant strain on these services and increase surface water runoff from the fields increasing flood risks.
6. The PFE plan has no proposals to mitigate any of these serious complications
7. Many houses have 2 cars per household which would mean approximately 3200 cars driving onto Rochdale Road via only one access point
8. The roads cannot cope with current traffic levels especially when there are minor roadworks, or detours from the motorway
9. The roads are not maintained to a good standard
10. The heavier traffic will make life a lot more stressful for residents e.g. getting to work, school or supermarket
11. Serious accidents and recently a death, are common on this road especially near Slattocks round about and there are no traffic calming proposals within the PFE plan

\* Environmental impact

1. There will be a severe loss of habitat for wildlife - I have personally seen deer, foxes, owls, lapwings, bats, hedgehogs, mice, voles, moles, frogs, many, many small song birds, a sparrowhawk, kestrels, herons and a cormorant in the field in front of Grange Road, and it's hedgerows.
2. Lapwings have a UK conservation list status of Red and are protected by the Wildlife and Countryside Act 1981
3. There will be loss of recreational space for the local population, many of whom enjoy walking, cycling and exercising in the area, which is a great source of stress management and healthy habits for many
4. Once this is lost it cannot be returned
5. The green "lung" of the area will be decimated and air quality will suffer with the significant increase in car fuel emissions and carbon emissions from homes - this will have significant impact on the health of the local residents

\* New PFE plan grossly over-estimates the housing need

1. Government data states that Greater Manchester population will rise by 158,000 however the PFE plan proposes 190,000 new homes!!! That's more houses than every man, woman and child.
2. Government data for Rochdale states that the population will rise 19,000 by year 2037 and new homes by 7,000. The PFE plan proposes 11,000 new homes for Rochdale. Where is the need for the extra 4,000 homes?
3. 7,000 new homes can easily be accommodated developing brownfield sites throughout Rochdale, with no need to build on Green Belt land
4. The land for JPA2: Stakehill has recently been redesignated by Rochdale council as no longer Green belt for the GMSF plan - The National Planning Policy Framework requires exceptional circumstances are required to justify this action. No justification has been put forward.
5. The wrong types of houses are proposed. 72,000 people are identified as being on waiting lists for affordable rented housing. The plan allows for only 30,000 only. JPA2: Stakehill proposes "higher value properties" with a "garden village approach"
6. The National Planning Policy framework states, "Ensure that existing settlements and pockets of housing are taken fully into account through the master planning of the area". The new PFE development will dwarf the

current numbers of houses and remove the village feel without any regard for the local residents.

\* Legal Compliance

1. This new PFE plan is significantly different to GMSF with a significant rise of housing for JPS2: Stakehill from 900 to 1600. As this is a significantly different plan there is no legal test that it complies with regulation 18 of the Town and Country Planning Regulations and so should not proceed to the final public consultation and submission under regulation 19.

\* Soundness

1. The PFE plan uses out-dated population data (2014) for housing predictions. The latest 2018 ONS population prediction figures should be used instead.

2. There is no confirmation of how the infrastructure changes will be met or funded

3. Rochdale council have been less than forthcoming with public consultations. All information to local residents has been provided by local concern groups following investigations. Public input has been of little to no concern to Rochdale council.

**Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.**

Modifications are to address all the points made above and follow due processes while being transparent with and inclusive of the local population.