

Places for Everyone Representation 2021

Family Name	Hill
Given Name	Peter
Person ID	1286821
Title	Stakeholder Submission
Type	Web
Family Name	Hill
Given Name	Peter
Person ID	1286821
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	<p>It is not possible to honestly answer the above questions.</p> <p>This is because the vision states that the PFE plan is only one element in achieving the vision (upon which we are being allowed to comment) and no information is available to assess any of the other elements. Therefore the questions cannot be answered fully and because there are only two choices the answers have to be NO in each case.</p>
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.	Change the vision statement to avoid this confusion OR include more detail and information as to how other elements interact with the PFE.
Family Name	Hill
Given Name	Peter
Person ID	1286821
Title	Our Strategic Objectives
Type	Web

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<p>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</p>	<p>1. Meet our housing need 6. Promote the sustainable movement of people, goods and information 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>NA</p>
<p>Soundness - Consistent with national policy?</p>	<p>NA</p>
<p>Soundness - Effective?</p>	<p>NA</p>
<p>Compliance - Legally compliant?</p>	<p>No</p>
<p>Compliance - In accordance with the Duty to Cooperate?</p>	<p>No</p>
<p>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.</p>	<p>By any dictionary definition of the word PLAN it means "A detailed proposal for doing or achieving something". Whilst being a little pedantic, this plan is short on detail in most of it"s content. Too many non specific words are used such as MAY, POTENTIAL, POSSIBLE, COULD, MAXIMISE and no doubt many others which leads the reader to assume this is no more than an aspirational wish list.</p> <p>The PFE is a spin off from an earlier attempt to create a spatial frame plan (GMSF) and the GMCA have refused to allow a public consultation on it"s content, as happened with GMSF. This refusal is based on the GMCA"s insistence that both plans are essentially the same. Because much has changed in the 6 years since the original GMSF was published surely cannot be their decision to make and a legal process should have been undertaken to ensure GMCA"s decision is legal. Changes that have taken place include:</p> <ul style="list-style-type: none"> -Population changes - young people become adults now with no input into the plan _Older people , and their views passing away -Brexit and the Pandemic will in reality have some form of affect on any long term plan with the full affects not yet known. -Original GMSF plan used 2014 figures for estimating population growth, now 7 years out of date - The GMCA responsible for PFE is now only 9 councils instead of 10 <p>Stockport council, having withdrawn from original GMSF, are obliged to have mutual cooperation with the 9 GMCA councils with regard to dealing with undercapacity.</p> <p>The PFE makes no specific reference to this</p>
<p>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</p>	<p>Provide a significant amount of more detail throughout the plan so that it is possible to weigh the significance and impact of each element on local areas, residents and businesses</p> <p>Withdraw the regulation 19 submission and carry out a regulation 18 consultation</p> <p>Include measures to show the effect of Stockport's apparent undercapacity in land for development</p>

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you have identified above.	
Family Name	Hill
Given Name	Peter
Person ID	1286821
Title	JPA 2: Stakehill
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
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.	<p>Legally compliant:</p> <p>As stated previously, the PFE is being treated as substantially the same as earlier GMSF plans which have now been withdrawn. So much has changed since the first GMSF publication that it is doubtful if the PFE can be treated as the same plan without some form of legal review.</p> <p>Positively prepared:</p> <p>The PFE has increased the number of houses in the area from 900 in the earlier GMSF plan to 1680, all within lesser space than originally proposed. No explanation for this is given. Rochdale Council has publicly stated their intention is build on this site "high value high spec " housing with a view to maximising income from council tax. In a national housing crisis this approach seem to fly in the face of what is actually required i.e. affordable housing.</p> <p>This effect of adding 1680 homes in the area has not been addressed in the light of present day problems with traffic, air pollution, flooding, sewage discharge, doctors surgeries etc</p> <p>National Policy:</p> <p>The PFE seems to avoid mention or compliance with National Planning framework with respect to flood risk.</p> <p>This states "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas of highest risk. Where development is necessary it should be made safe for it"s lifetime without increasing flood risk ELSEWHERE.</p> <p>Slattocks has a history of flooding ranging from the local watercourse spilling banks to Rochdale road and Slattocks roundabout under water. 50 years ago it was unheard of that Rochdale road would flood, the events have been coming more frequently in the past 10 years or so with the effect of:</p> <ul style="list-style-type: none"> -Driveways and rear gardens flooded -Slattocks roundabout flooded twice in 2 years (Rochdale Council will have exact dates) -Rochdale road flooded <p>The water table in the area has been rising over the past 40/50 years with at least 2 new springs appearing within the last 7. Fortunately these do not</p>

at present affect property but as a resident of 55 years I see where this is going.

Adding 1680 houses onto the very land which is currently doing it's best to act as a soak away can only have one outcome - more frequent and severe flooding.

Justified:

Just on the basis of loss of greenbelt land - a resource that has proved invaluable during the pandemic lockdowns to thousands of people- destroying forever this resource cannot be justified. PFE states a brownfield first approach to planning yet fails to demonstrate effective mechanisms to ensure that greenbelt will consistently

and effectively be last in line across the 9 councils forming GMCA.

Using Government calculations on the amount of land required by Rochdale it appears that Rochdale will only be around 50 houses short over the 16 years of the plan if all greenbelt allocations are removed. This does not warrant including greenbelt in the plan as this gives a 16% surplus as against the 5-10% buffer recommended.

The land allocated around Slattocks is mainly farmland used for silage (animal winter feed) and grazing. It is understandable that some farmers are willing to sell their land for development, but that alone does not justify using it for a dubious massive development that will swamp the village of Slattocks and destroy forever the chances of that land being used for useful food production. The land has been used in this context for a very long time and no doubt will be needed in the future, well beyond the 16 years of this plan.

The land in question, although not directly accessible to the public is bordered by

lanes and footpaths that provide ideal walking and cycling in a green , open landscape. Along with the Canal, these are used by thousands of people to exercise and escape the constant traffic noise of Rochdale/Manchester Roads and M62 motorway and Link road. If this land is built on these same lanes and footpaths will be passing through or bordering housing estates- hardly the same experience with the potential for the new residents to object to users invading what they will see as their territory.

The plan makes a fundamental error in declaring that 1680 high value high spec homes will enhance the area. The authors forget that residents of Slattocks are living in a semi rural area and that in itself creates a certain lifestyle. residents of any new massive development will not view the area in the same way because it will no longer be semi rural and this may create friction between old and new.

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.

Undertake a legal review to establish if the PFE is a valid proposal that does not need to adhere to regulation 18 scrutiny.

Introduce a lot more detail into the plan to explain how the existing residents of

Slattock will not be adversely affected by the development

Add to the plan a precise programme of investigation and solutions to the ever increasing flood risk in Slattocks

Remove or at least significantly reduce the quantity of housing being planned for this area