

Places for Everyone Representation 2021

Family Name	Markham
Given Name	Jean
Person ID	1286409
Title	Stakeholder Submission
Type	Web
Family Name	Markham
Given Name	Jean
Person ID	1286409
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 legally compliant because legality must be decided in a court before "Places for Everyone " can proceed any further. Submission under Regulation 19 PfE legality is not established. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, all sections of the plan have seen some form of change. So is "not insignificant" the same as "substantial". If it is then the plan is not legal. This can only be established by a proper judicial review. So until there is proof then the plan must be considered illegal and not put to Government.</p> <p>The plan is not sound because it uses 2014 data to predict housing need and ignores the potential impact of Brexit and Covid 19. Housing need must be re-assessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>There is little detail on how the required infrastructure will be paid for.</p> <p>There has been extremely poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups.</p> <p>The site selection process has been very secret with no explanation as to why some sites were excluded from the plan. The process should be done again using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published.</p> <p>PfE removes greenbelt protection in some areas and creates greenbelt in others. The creation of new greenbelt is in my opinion to try to lessen the percentage of greenbelt shown to be taken because some of the new areas of so called greenbelt are currently football pitches, public parks and even cemeteries. There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this action.</p> <p>There are no details of how Duty to Cooperate will be achieved.</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.	The PfE needs to be scrapped and a new plan produced using up to date figures and new working practices. There should be better communication from Councils and more public involvement. So many of the public are completely unaware of this plan. It is mainly local protest groups who have informed details of this plan to the public.
Family Name	Markham
Given Name	Jean
Person ID	1286409
Title	Our Spatial Strategy
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>I consider the plan to not be legally compliant for the following reason.</p> <p>It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before PfE can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development Plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any difference in scope between the GMSF and PfE it cannot be assumed that regulation 18 is automatically satisfied for PfE. Para1.23 states "The changes made between GMSF2020 and PfE 2021 are not insignificant in numerical terms, in fact all section of the plan have seen some form of change. So is "not insignificant" the same as "substantial". If it is then the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government.</p> <p>I consider the plan to be unsound for the following reasons.</p> <p>The plan uses 2014 data to predict housing need and ignores the impact of Brexit and Covid- 19. Housing need must be reassessed using the latest (2018) ONS population predictions and take into account the effect of Covid on work patterns.</p> <p>There has been very poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations</p>

should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input.

PfE has removed greenbelt protection in some areas and created greenbelt in others. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this to be justified. In my opinion this is just to make the percentage greenbelt taken appear less than is actually the case with football pitches, public parks and even cemeteries being reclassified as new greenbelt.

There is little detail on how the required infrastructure will be paid for. The plan needs to be revised to identify how all the infrastructure will be paid for.

The site selection process has been opaque with no explanation as to why some sites in the "call for sites" were excluded from the plan. The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes published. The rationale for the selection/rejection of every site should be available including considered alternatives.

There are no partners or industries identified for employment provision. Major partners for employment provision should be identified.

Several of the authorities involved have consistently failed to meet housing delivery targets. An effective plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery rates must be provided. This cannot be left to any local authority that is currently behind on housing targets. Clear delivery plans for infrastructure should be included.

There are no details of how Duty to Cooperate will be achieved. Following their withdrawal Stockport will effectively become an neighbouring borough. However, it is not acceptable to limit neighbouring boroughs to Stockport since each of the authorities in the plan is also neighbouring to other authorities outside of the plan. e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn with Darwin, Wigan neighbours St Helens and Trafford neighbours Cheshire area.

In addition to PfE each authority needs to produce its own local plan. No details have been given about when these plans will be available.

A change in the methodology for Manchester City council resulted in a 35% uplift for the Manchester City Council area. The revised Local Housing Need methodology states that the 35% uplift is to be met within the district and not redistributed. this represents a significant change between the previous spatial framework (GMSF) and the current joint development plan PfE.

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.

The plan needs to be scrapped and restarted again with proper public involvement and up to date housing requirements.

Family Name

Markham

Given Name

Jean

Person ID

1286409

Title

JPA 22: Land North of Smithy Bridge

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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
<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>Greenbelt.</p> <p>The site does not comply with PfE Objectives 7 and 8, and 6 out of the 7 Site Selection Criteria. It is not consistent with sustainable development and NPPF Chapter 13 for the following reasons. The site is not justified, nor positively prepared and not consistent with national policy.</p> <p>According to the NPPF greenbelt serves five purposes</p> <ol style="list-style-type: none"> 1) to check the unrestricted sprawl of large built up areas 2)to prevent neighbouring towns merging into one another 3)to assist in safeguarding the countryside from encroachment 4)to preserve the setting and special character of historic towns 5)to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The site is not justified because there is no unmet housing need across Rochdale to justify building on protected greenbelt land.</p> <p>Exceptional circumstances are needed to be proven by developers to build on greenbelt land and they have to demonstrate they have examined all other reasonable options.</p> <p>There are lots of brownfield sites not included and more will be become available as society comes out of the pandemic with changes in work patterns and these should be utilised before protected open land. There will be many shops and offices building no longer required which could be utilised for housing. There are enough brownfield sites in Rochdale to meet nearly all of the housing need.</p> <p>Therefore, other reasonable options exist and there are no exceptional circumstances to justify building 510 executive houses on greenbelt and greenfield (protected open space) land.</p> <p>More greenbelt land will also be taken for a car park to replace the one lost to executive housing.</p> <p>Traffic.</p> <p>The site fails to comply with PfE Objective 7 and is not consistent with adapting climate change, moving to a low carbon economy and NPPF Chapters 2 (para 8) and 9.</p> <p>The area has seen a massive increase in traffic already due to the large amount of houses already very recently built in the area and also due to its being in very close proximity to Hollingworth Lake. (a trip advisor award winning attraction, that sees hundreds of visitors on a daily basis but especially at weekends.)</p> <p>The site is not justified and not consistent with National Policy.</p>

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Local train stations struggle to meet rush hour demand already therefore many will use cars which will significantly increase CO2 levels on the already congested road network in the area and is not sustainable.

The site is not accessible to the Metro (4km away and with no direct bus link)

The existing roads will not accommodate the extra traffic of 1000 plus cars and the traffic assessments are out of date and are unbelievably optimistic.

Schools.

The site fails to comply with PfE Objective 9 and is not consistent with NPPF chapter 8 (para 95).

The site is not justified and not consistent with National policy.

It is critical that there is a sufficient choice of school places available to meet local needs.

The new primary school being built on Calderbrook Road is for two form entry. The current one is two and half form entry. This means the area is losing primary places.

There is already a severe shortage of senior school places for local children with many of them currently having to travel out of the area.

Flooding

The site fails to comply with PfE Objective 2 and is not consistent with NPPF chapter 14

The site is not justified, not effective and not consistent with national policy.

The assessment of the flood risk for the site does not fit with reality. The site does have some degree of flooding.

Building on green belt land means concreting over open fields. Removing trees, shrubs, plants and hedgerows that soak up a large amount of water will only increase the risk of flooding in the area.

Any building on greenbelt/ greenfield land with Littleborough and Smithy Bridge could contribute to more instances of flooding. In 2015 Littleborough had significant flooding with many houses and shops under water. This was with the green land we have today. Bricks, tarmac and flagstones do not absorb water. Every house built chips away at the vital protection the greenbelt land provides. If these houses are built then the "once in a lifetime" 2015 floods could become more common.

<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.</p>	<p>The modification I consider necessary is that JPA 22 Land North of Smithy Bridge be removed from the Places for Everyone Plan for the reasons detailed above.</p>
<p>Family Name</p>	<p>Markham</p>
<p>Given Name</p>	<p>Jean</p>
<p>Person ID</p>	<p>1286409</p>
<p>Title</p>	<p>JPA 24: Roch Valley</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>

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>Greenbelt.</p> <p>The site does not comply with PfE Objectives 7 and 8, and 6 out of the 7 Site Selection Criteria. It is not consistent with sustainable development and NPPF Chapter 13 for the following reasons. The site is not justified, nor positively prepared and not consistent with national policy.</p> <p>According to the NPPF greenbelt serves five purposes</p> <ol style="list-style-type: none"> 1) to check the unrestricted sprawl of large built up areas 2) to prevent neighbouring towns merging into one another 3) to assist in safeguarding the countryside from encroachment 4) to preserve the setting and special character of historic towns 5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The site is not justified because there is no unmet housing need across Rochdale to justify building on protected greenbelt land.</p> <p>Exceptional circumstances are needed to be proven by developers to build on greenbelt land and they have to demonstrate they have examined all other reasonable options.</p> <p>There are lots of brownfield sites not included and more will be become available as society comes out of the pandemic with changes in work patterns and these should be utilised before protected open land. There are enough brownfield sites in Rochdale to meet nearly all of the housing need.</p> <p>Therefore, other reasonable options exist and there are no exceptional circumstances to justify building 510 executive houses on greenbelt and greenfield (protected open space) land.</p> <p>More greenbelt land will also be taken for a car park to replace the one lost to executive housing.</p> <p>Traffic.</p> <p>The site fails to comply with PfE Objective 7 and is not consistent with adapting climate change, moving to a low carbon economy and NPPF Chapters 2 (para 8) and 9.</p> <p>The area has seen a massive increase in traffic already due to the large amount of houses already very recently built in the area and also due to its being in very close proximity to Hollingworth Lake. (a trip advisor award winning attraction, that sees hundreds of visitors on a daily basis but especially at weekends.)</p> <p>The site is not justified and not consistent with National Policy.</p> <p>Local train stations struggle to meet rush hour demand already therefore many will use cars which will significantly increase CO2 levels on the already congested road network in the area and is not sustainable.</p> <p>The site is not accessible to the Metro (4km away and with no direct bus link)</p>

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	<p>The existing roads will not accommodate the extra traffic of 1000 plus cars and the traffic assessments are out of date and are unbelievably optimistic. Schools.</p> <p>The site fails to comply with PfE Objective 9 and is not consistent with NPPF chapter 8 (para 95).</p> <p>The site is not justified and not consistent with National policy.</p> <p>It is critical that there is a sufficient choice of school places available to meet local needs.</p> <p>The new primary school being built on Calderbrook Road is for two form entry. The current one is two and half form entry. This means the area is losing primary places.</p> <p>There is already a severe shortage of senior school places for local children with many of them currently having to travel out of the area.</p> <p>Flooding</p> <p>The site fails to comply with PfE Objective 2 and is not consistent with NPPF chapter 14</p> <p>The site is not justified, not effective and not consistent with national policy.</p> <p>The assessment of the flood risk for the site does not fit with reality. The site does have some degree of flooding.</p> <p>Building on green belt land means concreting over open fields. Removing trees, shrubs, plants and hedgerows that soak up a large amount of water will only increase the risk of flooding in the area.</p> <p>Any building on greenbelt/ greenfield land with Littleborough and Smithy Bridge could contribute to more instances of flooding. In 2015 Littleborough had significant flooding with many houses and shops under water. This was with the green land we have today. Bricks, tarmac and flagstones do not absorb water. Every house built chips away at the vital protection the greenbelt land provides. If these houses are built then the "once in a lifetime" 2015 floods could become more common.</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 you have identified above.</p>	<p>The modification I request is that JPA: Roch Valley be removed from the Places for Everyone plan for the reasons detailed above.</p>
<p>Family Name</p>	<p>Markham</p>
<p>Given Name</p>	<p>Jean</p>
<p>Person ID</p>	<p>1286409</p>
<p>Title</p>	<p>Other Comments</p>
<p>Type</p>	<p>Web</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>
<p>Soundness - Justified?</p>	<p>Unsound</p>
<p>Soundness - Consistent with national policy?</p>	<p>Unsound</p>
<p>Soundness - Effective?</p>	<p>Unsound</p>

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Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	No
Family Name	Markham
Given Name	Jean
Person ID	1286409
Title	JP-G 10 Green Belt
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