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Given Name	Timothy
Person ID	1287253
Title	Stakeholder Submission
Type	Web
Family Name	O'Brien
Given Name	Timothy
Person ID	1287253
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
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>National planning policy requires that for Greenbelt to be built upon, then 'exceptional circumstances' must be demonstrated in justifying this.</p> <p>Neither the local council or the combined authority have demonstrated any circumstances whatsoever to justify the destruction of the last accessible green space near Bamford. Further to this, there are compelling reasons to demonstrate that such a development runs contrary to the interests of the local and broader community, that there is no evidence of need, and that there are motives other than the principles of PFE or GMSF for pursuing the plan.</p> <p>The plan is founded on an evidence base which is 7 years out of date. No rational decision in any sector would base a decision upon evidence from 2014 yet this is what PFE decided when Stockport pulled out of GMSF. This was an opportunity to re evaluate, to gather up to date evidence and to consider the broader implications of a post covid, post Brexit situation. Conditions are now changed radically in ways which we are still discovering. The implications for planning on such a scale are obvious yet this was ignored as the 9 remaining authorities pursued PFE with undignified haste. The evidence could have been refreshed with more accurate population projections, windfall sites, changed patterns of working, not so. Clearly a breach of NPPF10b which requires a 'objectively assessed need.'</p> <p>There has been minimum consultation throughout both locally and more broadly. Rochdale council has failed to reach its communities who have only become informed through the activities of community groups, not through any effort at all on the part of the council to reach out to inform. This is typical of the obfuscation apparent from the outset. There has been zero engagement with the community to the extent that the community relies upon voluntary groups for any information. Many felt that 'it' had gone away. Rochdale council did nothing to inform its constituents. It failed in the commitment to community involvement.</p>

In the Bamford/Norden proposal the major landowner discovered that his land was included through the work of the community and the media. He did not put his land forward in the original call for land, he is opposed to the development and has resisted approaches from Peel to sell his land to them. Peel put the proposal forward including over 70% of land which they do not own. They were in discussions with Rochdale council for nearly two years before the community was even aware of the GMSF. Peel own less than 30% of the proposed building area. This demonstrates a developer led proposal which is clearly a breach of the duty to objectively assess the selection of the site based on need. NPPF 10b.

I met with with Allen Brett REDACTED TEXT, the then Rochdale council leader and Rochdale representative on the combined authority group, he claimed to have no knowledge of Peel's involvement. This is strange as they had been involved for such a length of time. He also made perfectly clear why the council intended to build 450 executive detached properties up Bamford. He was unequivocal in asserting that the reason was the need for the council to increase the council tax take in the borough. He went to great length to explain that over 70% of the tax is in the lowest band, that the government support grant had been cut, and that the council's solution was to build high end properties. The council coffers would also benefit from the new homes bonus. He made it perfectly clear that this was a Rochdale council priority notwithstanding any GMSF principles or aims. This was witnessed by my two colleagues and has since been corroborated by Labour councillors from both Littleborough and Castleton who voted against the PFE greenbelt building proposals, they are also affected. NPPF 10.2 again, clearly not an objective assessment of need

Rochdale is willfully building the wrong houses in the wrong places for the wrong reasons and against the wishes of landowners affected. The soundness of the plan both for Bamford and throughout the borough is therefore clearly compromised.

Further to this at all council meetings throughout the process where a vote has been required, such votes have been whipped by the leadership thereby tying the hands of Labour councillors. Some despite this, voted against. During the July debate this year on PFE Councillor John Blundell, leading the case for PFE stated that both Littleborough and Bamford would be built upon 'come hell or high water.' This is a matter of public record. It is hardly a term used by a councillor who is willing to listen to all and any concerns dispassionately. Not only is the soundness of the site selection compromised, the democratic process itself is compromised while NPPF 10.2 is again breached this being anything other than an 'objective' assessment of need. It clearly suggests something very different.

To the objective eye there would appear to be an agenda. This agenda was also revealed when, as a concerned member of the community, I met the planning lead team in Rochdale on REDACTED TEXT. In conversation with regard to the Bamford site one of the planners said that we have been lucky to hang on to that bit of greenbelt in Bamford for so long! This does not suggest any objective mindset on behalf of those with a responsibility to behave in exactly such a manner on behalf of the people of Rochdale. It is difficult to draw any conclusion other than that this is a predetermined decision ignoring any principles of either GMSF, PFE or NPPF 10.2.

The above fits very neatly with the rationale given by Peel in the plan where it talks about the area being as it were, a circle which needs squaring. This presumably, to create some sort of symmetry to the shape of the developed area in Bamford/Norden. This level of thinking fits better with the decision to include it in PFE. It utterly ignores all the issues which others will also have raised with regard to infrastructure as well as having a cavalier attitude to the loss of the last area of accessible green in Bamford which has no park or other similar accessible area. To use such thinking as a justification for

losing forever a treasured local amenity amenity defies belief and underlines the lack of any sound justification for the site selection.

REDACTED TEXT I attended a meeting at REDACTED TEXT with Andy Burnham. I was impressed to hear him state clearly that the GMSF worked on the basis of a brown field first principle and that release of greenbelt was contingent upon brown field first, 'It should not be green field first but brown field first must be the guiding principle.' When asked whether any landowner would find their land included against their wishes he replied, 'If it is their land and they don't want to sell, I would say that should be that. I think this should be respected.' The major landowner in Bamford is still opposed to the plan yet the land is still included by Rochdale council. When this was mentioned to Allen Brett he was clear that he did not envisage any CPO in Rochdale yet this is what has again raised its head.

In order to justify the use of greenbelt the combined authority and Rochdale council have gone to great lengths to say how they have reduced the amount of greenbelt being taken. What they don't say is that this is a net calculation. It does not take account of the fact that Rochdale council have recently and deliberately designated additional areas as 'greenbelt'. Firgrove playing fields, Cardinal Langley School playing fields, Heywood park, an area of the marshy flood plain of the River Roch are hardly any compensation for the loss of pristine greenbelt land. The loss of the greenbelt remains despite the net total being less due to the addition of areas which will always be green and which in no way compensate for the loss of amenity with the loss of genuine greenbelt. The true nature of this has not been shared with the community who could be forgiven for believing that the loss is less than it really is. This is nothing less than deception and it characterises the manner in which information has been manipulated and obfuscated throughout. Any plan underpinned in such a manner can not be deemed sound. Any requirement to consult is undermined and becomes redundant.

The loss of greenbelt is clearly a choice and not a need. The figures also support this. There is enough brownfield available in Rochdale to meet Rochdale's projected need for the next 16 years without touching any greenbelt whatsoever. More is the point, the brownfield sites are more accessible to transport links and motorways, they would be the right houses in the right places for the people who need them. This would generate less environmental damage and could be better lent to sustainable development than inaccessible sites such as Bamford/Norden. Both Rochdale and the combined authorities are planning to build more houses than are needed. Rochdale LHN is 8.048 with land available for 7,997 with no release of greenbelt. There are also other developments, South Heywood for example where permission has been granted for 1,000. The rail corridor and town centre developments further consolidate this while again, there is no consideration given to the changed circumstances post covid/Brexit. Despite this the council wishes to build 4,000 houses on greenbelt. The evidence base needs to be refreshed. The site fails to comply with PFE objective 2 and is not consistent with NPPF Chapter 2. There is no identified need for the type of houses proposed for the Bamford site. The area is already extremely well served with the type of houses which are proposed, it has no need of any more, nor has Rochdale. Rochdale needs affordable and social housing in the right places. Other options have not been considered, quite probably because of the reasons given above with regard to the motives of the council in choosing the Bamford site. Criterion 7 of the PFE site selection criteria is the only one which it is deemed the Bamford/Norden site meets. It clearly fails to meet any local need as there is none.

There is no unmet housing need in Rochdale to justify release of protected greenbelt. Neither the developers or the council have proved there are any exceptional circumstances to justify this plan, nor have they demonstrated that they have explored any reasonable options. The fact of the matter is

that they have focussed on this location for ulterior motives as outlined above, and have clouded the process with obfuscation throughout. The site does not comply with PFE objectives 7 and 8. It does not fulfill any local need.

With regard to traffic and climate the Bamford site fails to comply with PFE objective 7 and is not consistent with a sustainable adaptation to climate change, a low carbon economy and NPPF chs 2 and 9. The site is as far as it is possible to be from the nearest rail and metro stations/stops. The local bus service is limited and is currently running an emergency restricted timetable. The 450 houses would generate far more car use and traffic than we are led to believe as this is the only way to get to Manchester where those residents would presumably work, they would be unlikely work in Rochdale.

Carbon emissions from such cars are significantly higher than those from urban homes nearer to transport hubs. The plans to create one way roads were hidden in the original framework in a separate section from the site section. The traffic issues already experienced would not be in any way mitigated and would arguably be severely impacted by these schemes creating a large fume surrounded traffic island of much of Bamford at busy times. There has been no evidence provided to suggest this would be in any way beneficial. PFE objectives 8 is failed while NPPF chs 2,9 and 14 reveal inconsistencies.

Bamford has seen 2000 new builds in the last 60 years. There has been no planned increase in infrastructure. The nearest doctors surgery has a patient to doctor ratio twice that of the national average while both local schools already very much over subscribed. There are plans for neither in PFE. An already creaking infrastructure would be clearly inadequate creating dangers to the health and welfare of the community. PFE obj 9/NPPF ch8, the site is not justified and is inconsistent with national policy.

As I sit here typing the Bamford site is flooding due to the rainfall we are experiencing (2/10/21). The assessment of flood risk is a nonsense and bears no relationship with the reality. It floods on a regular basis. Porritt Close, directly opposite the land owned by Peel has flooded in the past. The proposed development has no plans to mitigate or cope with the increased run off and it ignores the increased risk of flooding in the area itself and those nearby. PFE Objective 2 is failed and NPPF ch 14 compromised.

The site provides immeasurable value as the only accessible greenbelt amenity available. It is used heavily by walkers, dog walkers, mountain bikers, horse riders with such uses increasing exponentially over the period of the pandemic and showing little sign of reducing. Criss crossed by public footpaths, it is the principle route to the Ashworth Valley area of outstanding natural beauty and it provides the margin of protection that area needs to prevent it becoming a rat run. Should the development take place it would extend to within several hundred yards of the quiet lanes of Ashworth Valley. These lanes would inevitably become rat runs given the increased traffic and congestion pressures 450 additional houses on the doorstep would generate. The pressure would have to be released somewhere, the one ways will make no difference to an already overburdened road network which has little scope for improvement. The consequences for Ashworth Valley could be disastrous while what constitutes an amenity for the people of Rochdale would be destroyed.

The natural environment would clearly be diminished as a part of the loss of the amenity. The deer, badgers, hedgehogs, dormice, bats, birds and other wildlife which are supported by the area are suffering threats enough to their habitats. The plan gives scant consideration to the need to look to sustainable change. This reveals that the plan is in essence yesterday's expansionist model of consistent consumption and growth when we are in a position to consider a sustainable model of progress. The lack of emphasis on brownfield is of course another symptom of this malaise which infects the

whole PFE and this site in particular. It is narrow minded and fails to consider reasonable alternatives. REf PFE objs 7.8,10 and NPPF chs 8 and 15 for last two paras.

I trust I have demonstrated that the plan with regard to Bamford/Norden is neither sound in terms of site selection nor is it consistent with national policy. There is evidence to indicate other elements at play, non of which are wrtten into the PFE but which enable an inderstanding of the choices made by Rochdale Council. These also enable an understanding of the fundamentally flawed 'consultation' and total lack of community involvement wwhich alone should deem the proposal to be in beasch of legal requirements. There is no identified and evidenced need for such housing in this location, the main landowner objects strongly, there is huge community opposition, this is developer led, it is not consistent with a 'brown field' first policy.

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.

JPA 19 Bamford/Norden be removed from PFE.