

Places for Everyone Representation 2021

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| Family Name | Peachey |
| Given Name | Irene |
| Person ID | 1287225 |
| Title | Stakeholder Submission |
| Type | Web |
| Family Name | Peachey |
| Given Name | Irene |
| Person ID | 1287225 |
| 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. | It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" 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 substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, 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. |
| Family Name | Peachey |
| Given Name | Irene |
| Person ID | 1287225 |
| Title | Our Strategic Objectives |
| Type | Web |
| Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your | <ul style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure |

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| written comment refers to: | 10. Promote the health and wellbeing of communities |
| Soundness - Positively prepared? | Unsound |
| Soundness - Justified? | NA |
| Soundness - Consistent with national policy? | NA |
| Soundness - Effective? | NA |
| Compliance - Legally compliant? | No |
| Compliance - In accordance with the Duty to Cooperate? | NA |
| 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>The information made available by GMCA, and Rochdale council can be questioned and requires consideration of suitability. Appropriate information made available to all of the residents affected, and sufficient and appropriate means of feedback for those persons. This has not been adhered to, with poor consultation, sharing of information, and vague plans.</p> <p>The actual timing for the new plan, the consultation system and the period of times made available for residents to undertake feedback is inappropriate. The Places for Everyone Plan does not meet The Gunning Principles.</p> |
| Family Name | Peachey |
| Given Name | Irene |
| Person ID | 1287225 |
| Title | JPA 21: Crimble Mill |
| 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>Crimble Mill was added as a last minute addition to GMSF. Residents were not informed that we were to lose our Greenbelt for 250 high end houses.</p> <p>Since GMSF has been disbanded and with the onset of COVID-19 and the pandemic there has been no consultations for Places for Everyone Proposals.</p> <p>None of the four Gunning Principles have been adhered to.</p> <p>There are no forms plans for the mill shown in the proposals, information extremely vague.</p> <p>In the Statement of Adoption/Statement of Community Involvement it makes it clear that RMBC refers to the state of the mill being very bad.</p> <p>Paragraph 1.227 quote; That their expectation would be that the mill would be the FIRST phase of any development . It should not be an expectation,</p> |

it should be absolutely mandatory and the first priority. So far there have been no plans for the development of the mill.

The future development of Mutual Mills was agreed, until the developer realised the extent of the cost of development and has withdrawn proposals. Mutual Mills is in a far better state of repair than Crimble Mill. How can we be reassured the development of Crimble Mill will go ahead when the condition of the building and site will cost £1000000's?

Sustainable Development

There are several brownfield sites in Heywood, which are more suitable for a sustainable development of affordable housing, which the borough needs, rather than losing Greenbelt to high end housing.

The land at Crimble Mill is said to be contaminated, how can it be developed under sustainable development?

What will the footprint of an additional 250 homes be on the environment?

What effect will these homes have on the other residents in the area, air quality, infrastructure, managing flood risks, health implications.

The proposed development is set below an established residential development and close to a primary school with an Early Years class play area directly adjacent to the site. We need to protect our children and future generations health. The building of 250 homes over a seven year period will have a massive impact on well being, health and the NHS.

Introducing 250 new homes, plus the mill development could estimate approximately 700 cars. These cars would access the proposed site via Crimble Lane, and a secondary access near Mutual Street. Both of the suggested areas are already congestion hotspots. Crimble Lane is at present a single track lane, and would require development to cope with the volume of traffic suggested. This lane is sited between housing, and also enters the A58 at a narrowed section. The access point at Mutual Mills is close to other already crowded streets. The terraced streets in this area currently have traffic calming measures in place. Increasing the traffic flow in this area would put a significant strain on already highly congested narrow streets. The local houses would be subjected to a massive reduction in the air quality, and also increase in sound pollution to their properties.

At the foot of the site is the River Roch. The land around the Roch is a designated Flood Zone. A change in the land from the porous greenbelt to that of Housing and Road would increase the water flood off the site into the flood zone. The impact of the water flow is also likely to affect the next flood zone - Queens Park.

The Mill itself lies in the flood zone. Developing here contradicts the proposal itself. This area has seen, and recorded significant floods and damage over recent years. The proposal makes no reference to how this can be managed. As the Mill is located in a flood zone questions must be asked with regards to Housing Policy, insurance and finance implications.

Surely this will have an impact on the flow of the river and flooding in other towns, such as Radcliffe where the river runs into the River Irwell. Homes in this area have already been flooded several times over the past two years.

What impact will there be on the Resource Efficiency with an additional 250 at Crimble, when plans for 1110 homes are under development at South Heywood, Junction 19, Hopwood. Surely these homes should be built and the resource efficiency monitored before the considerations for additional high end family housing!

Places for homes

The plan 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.

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

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

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.

https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228 The process should be repeated using National and GMCA guidelines for site selection. Meetings with public representation should be held and minutes should be published. The rationale for the selection/rejection of every site should be available including considered alternatives.

Several of the authorities involved have consistently failed to meet housing delivery targets. An effective a 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.

There are many brownfield sites, in sustainable locations and closer to facilities and infrastructure. ie the old Mossfield School and Bamford Squash club, Bamford Road.

These sites should be considered before the need to release Greenbelt land at Crimble.

None of the housing proposed at The Crimble are affordable house, all being high end, detached. At present, the majority of housing proposed by Rochdale are all of high end

quality, over 300 already built on the border of Heywood and Middleton at Hollin and Langley Lanes.

Money and funds would be much better spent on affordable housing for young people,

(I recently spoke to someone who had two adult children still living with her as they cannot afford to save for a deposit to buy their own home, these adults are both in their 30's) and social housing for singles, couples and families rather than renting privately.

The Crimble Greenbelt and Crimble Mill are not accessible location. The main access road to the proposed 250 homes is via Crimble Lane, from the A58, Rochdale Road East. Crimble Lane is a single Lane bridle path, bound by retaining walls and too narrow to account for two way traffic and pedestrians. These are fundamental concerns to residents as a possible 250 cars a day could use this access, this does not take into account of delivery drivers etc. This in itself should raise unacceptable highways safety concern and implications.

The access point at Mutual Mills is close to other already crowded streets. The terraced streets in this area currently have traffic calming measures in place. Increasing the traffic flow in this area would put a significant strain on already highly congested narrow streets. The local houses would be subjected to a massive reduction in the air quality, and also increase in sound pollution to their properties.

Further to the residents vehicle access, there is no mention of the vehicles accessing the area to service the needs and demands of the home owners. This will add further numbers to those predicted and has not been taken into account.

There is no mention or consideration to the other developments already on going New information and studies will be required to analysis their impact before further development takes place locally. Question of sustainability.

The proposal does not address the access issues with regards to the area. In fact, it acknowledges the issues, and confirms the complexity, as a "result" is still being "worked towards". This demonstrates without doubt this site is unsound and unsustainable. If traffic is unable to safely access and leave the site, the allocation itself should not be considered unsound and unsustainable and removed from the Places For Everyone Plan.

The Mill access is currently across a restricted bridge. This bridge has now been determined as a none viable option for future use, and will be downgraded to foot traffic only. With no secure or viable access to the Mill, to propose access to houses, only being developed to fund a Mill which cannot be developed and accessed safely requires question, investigation and legal implications.

Access has been proposed to the mill via Crimble Lane from B6222, Bury Road, another single track road of a steep gradient, three sharp corners and part of which is privately owned.

Any changes to the roads contradict the Historic Environment Assessment, Report No: 2020/82 which states; Any design should reflect the rural setting and consider incorporation of green space, the density of the development, the height and boundary treatments. There should also be a consideration of the transition from the open landscape to the edge of the development.

Vehicular access to the Site should be avoided within the immediate vicinity of the mill, as part of the buffer zone, proposed above. Where possible, Crimble Lane should also be preserved as a single track road as this contributes to the rural character of the landscape and the setting of the mill.

Greener Places

The proposed land to be used in the Crimble Mill site is Greenbelt land. In the proposal the same plan also says Queens Park will be given Greenbelt status so that it has a higher level of protection in the future against any potential building plans. Yet this plan intends to do just that and build 250 houses on greenbelt land. Is Queens Park next?..... If the developer needs to off set costs for the development of the Mill then do so by developing on one of the many Brown Belt sites in the Rochdale borough To use the greenbelt is un necessary and just a ploy.

The Rochdale area has got many other areas of Brown belt sites which can and should be exhausted before the destruction of the Green Belt. Whilst the Brown Belt and may require a cleanup cost - this is a onetime cost to the development. Destroying the Green Belt is a lifetime cost! The proposal does not consider many of the Brown Belt sites within the Rochdale and Heywood area.

The proposals only show plans and development for the Greenbelt land and do not include any information regarding the Grade II Listed Mill. As the Mill is apparently the Armstrong of this proposal, to not include any information or plans for the development of the Mill demonstrates the unsound, unsustainable elements of this proposal. To release this greenbelt land when there are no plans for the mill requires further investigation and questions the legal responsibilities of Rochdale Council and the GMCA in their parts of involvement. No information as to the cost of the Mill for development against the land suggested for release. This raises legal questioning.

Why is Crimble Greenbelt being proposed for development rather than being safeguarded in addition to land at the Summit, Heywood being proposed as new Greenbelt, which will provide future protection, which is adjacent to a large established residential estate. There seems to be a hidden agenda!

Within the suggested area there are birds, foxes, deer, squirrels, rabbits, badgers, and a multitude of amphibious creates around and in the River Roch. If this area is then used for the building of Housing the wildlife will lose its natural habitat and environment. Where do these animals move too? If this area is built on then what will be the impact on the surrounding areas and the wildlife there - Queens Park is one of the neighbouring areas. The proposal includes removing woodland habitats, ancient hedgerow, and changing the biodiversity and geo diversity of the landscape, which in itself is heritage. The removal of this greenbelt land to allow development does not support the heritage of Crimble Mill, nor will it add to the area"s value or that of the failing Crimble Mill.

Loss of Recreational Management Area

Nearly half of the greenbelt land at site is in fact a designated Recreational Management Area. In these areas the council promotes outdoor recreational use including both specialist sports and active outdoor pursuits and passive recreation (e.g. Nature appreciation and related educational pursuits) that are consistent with the conservation and enhancement of the local landscape and ecology.

The plan not only takes away this area, no alternative area is designated for the local communities to use in return. The area is very popular with dog walkers, cyclists, families walking, children playing, horse riders - a whole multitude of local people seeking a space for outdoor activities in open space.

There are two existing coal mines on the sites, which the coal authority class as high risk with regards to future developments. There is also a fault line which runs south through Harewood Drive. There is documented evidence of structural concern to nearby properties and it was advised only light vehicles use the roads. Construction of any kind in this area WILL have a direct impact on the existing houses. Legal advice is already under investigation prior to the commence of any development work on the greenbelt area.

Other incidents along this fault line included subsidence issues in houses on The Vistas estate, Green Lane, Heywood.

Lack of Infrastructure

The introduction of 250 new homes, plus the development of the Crimble Mill would bring an increase in the local population? Where is the investment for the Doctors surgery, the dental practises, local A&E department, local schools, and Police and Fire services? All of these areas are already oversubscribed and existing residents are struggling to gain access to them. Increasing the demand further impact the local infrastructure. Waiting times are already too high.

Rochdale is already struggling to cope and service the waste management for the borough, I see no information as to the plan addresses any increase in the waste demands the thousands of new houses will create.

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| Family Name | Peachey |
| Given Name | Irene |
| Person ID | 1287225 |
| Title | JPA 23: Newhey Quarry |
| Type | Web |

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| <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>Transparency is paramount, local residents should be included in consultations and allow sufficient time frames to allow residents the time to undertake appropriate actions and generate formal responses.</p> <p>Future generations and the impact on their health and well being should be prioritised.</p> <p>Prioritise brownfield sites above and beyond the loss of Greenbelt.</p> <p>Maintain duty of care, implementing the Gunning Principles.</p> <p>Review the proposed in line with the strategic objectives and promise the community not to deviate.</p> <p>Involve independent local people representatives onto the planning committee to review on behalf of the communities to ensure the needs of the community are understood and met.</p> <p>RMBC to consider the number of high end housing in all their proposals across all sites in PfE in comparison to the needs of affordable housing and prioritise building social housing at affordable costs for younger generations.</p> <p>Protect our Greenbelt and remove this site from the plan.</p> |
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