Family Name	Peachey
Given Name	Michael
Person ID	1287224
Title	Stakeholder Submission
Туре	Web
Family Name	Peachey
Given Name	Michael
Person ID	1287224
Title	Our Vision
Туре	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	Insufficient involvement of local people in all areas due to COVID 19 pandemic.
of why you consider the consultation point not	Process is being pushed through with very little face to face consultation with people in all areas.
to be legally compliant, is unsound or fails to	Housing requirements are based on old out of date data.
comply with the duty to co-operate. Please be	ALL Proposed housing developments are Higher quality value housing - NOT AFFORDABLE HOUSES FOR EVERYONE.
as precise as possible.	Plan shows use of green belt for housing developments - priority should be assigned to utilising ALL brown field sites first.
	No real evidence of major new businesses moving into local areas, previously constructed Kingsway Industrial Estate still has empty facilities and space for further units to be built. New Industrial Estate Pilsworth now be extended ruining countryside.
	Motorway network CANNOT COPE with current traffic levels.
	Rochdale / Cross Boundary Sites will generate over 6911 new houses ALL HIGH VALUE HOUSES - NOT AFFORDABLE HOUSING FOR EVERYONE. This could lead to a further 14,272 vehicles on our already heavily congested motorway and local roads.
	Infrastructure inadequate to cope in Rochdale Borough.
Redacted modification	Realise the plan using the most up to date data.
- Please set out the modification(s) you consider necessary to	Data for new houses is based on 2014 which is not the latest available, it should be re estimated based on 2018 data.
make this section of the plan legally compliant	It should also take into consideration the effect of Brexit and the Covid 19 pandemic.
and sound, in respect of any legal compliance	ENGAGE REAL and PROPER FAIR Face to face CONSULTATION with PEOPLE in the local areas.

or soundness matters you have identified above.	
Family Name	Peachey
Given Name	Michael
Person ID	1287224
Title	Our Strategic Objectives
Туре	Web
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?	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.	All unjustified
Family Name	Peachey
Given Name	Michael
Person ID	1287224
Title	JPA 19: Bamford / Norden
Туре	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
Family Name	Peachey
Given Name	Michael
Person ID	1287224

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Title	JPA 21: Crimble Mill
Туре	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	Note: Crimble Mill development is Allocation 21 and NOT as per the error above where it is stated as 22.
of why you consider the consultation point not to be legally compliant,	JPA21: Crimble Mill was squeezed into the GMSF at the very last minute. There was a total lack of public consultation at that time.
is unsound or fails to comply with the duty to co-operate. Please be	PfE includes this site again and it has to be questioned whether this is indeed legal that this site should progress as there has been no formal public consultations due to Covid 19 Pandemic.
as precise as possible.	The whole purpose of this development of 250 houses on GREENBELT is to enable funds to be raised to renovate the dilapidated mill which whilst it has Heritage Grade II listing has been in a terrible state for over 25 years whilst we have lived in the area.
	The danger is we loose our greenbelt and the mill falls into a worse state of repair as it is only planned to be renovated after the all the houses are built (approx 6 yrs at 40 houses per year) and the green belt has been lost forever. There is no evidence or guarantee of funds to complete this work on he mill. How much will it cost to renovate? There are NO formal outline plans for the mill area shown in the proposals. Information is extremely vague.
	In the Statement of Adoption / Statement of Community Involvement it makes it clear that even the RMBC refers to the state of the mill as being "very bad". Paragraph 1.227 quotes that their expectation would be, that the mill would be the first phase of any development. It should not be an expectation, it should be absolute mandatory and 1st priority. But as I stated early why does the mill development proposals not even figure in the plans? Do the developers even know what is needed to be done or should we ask have the even got any intention of even completing this part of the project?
	On the recent Mutual Mills proposed conversion to apartments which was approved only for the developers to back out as the costs were deemed to high to complete the project. This cannot and must not happen on this case, Housing develop must not be allowed to commence prior to the mill issue being resolved as it is likely cost millions.
	The access is inadequate and the road leading to the potential site is via Crimble Lane which is a single track bridleway and even recommendations in the assessment on the mill states this single track lane should be retained to keep in character with the mill and surrounding area. All of which is part of the local heritage. This would not be safe as there could be over 500 vehicles using this lane accessing it from Rochdale Road East which is already jammed up at peak times.
	The map shows all areas around the planned site as greenbelt so why have the proposed housing sites not been included in the greenbelt when it is already greenbelt? Even the area where the mill is located is suggested to

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become greenbelt? What does this mean? That it will never be built on or renovated as it's Newly designated greenbelt? The plans are totally flawed. Even the map showing proposed housing site shows the mill as being already greenbelt in areas of mass outside storage. Is this not a brownfield site that should be developed first!

Why create greenbelt elsewhere should we not be retaining existing greenbelt?

Access to the mill is via a bridge which is deemed not suitable so traffic to the mill would have to come from the Bury rd side, again single track bridleway with a extremely difficult steep route down the valley. It is not safe from either side and in total contradiction of Places for Homes density of new housing details.

The site is also flood zone 283 and has flooded 3 times in the last 3 years

	The site is also flood zone 2&3 and has flooded 3 times in the last 3 years.
	Any additional flood zone improvements around the River Roch is likely to have a knock on effect on other towns downstream as has been seen from recent flooding in Hebden Bridge & Todmorden and in the effect in Rochdale Town Centre and No1 Riverside. The later of which was approved for planning and constructed on a potential flood zone.
	What was the cost to the RMBC when it was flooded around 3 yrs ago? Have we not learned anything at all?
	Mine shafts are also present on the proposed site. Risk of holding water in old mine shafts when flooding occurs. High risk to new houses being built in top of this, subsidence, sink holes etc. In addition there is a high risk of structural damage to our current houses as a result of potential pile driving on land to try and make it safe.
	Little consideration of wildlife. Birds, deer, foxes, badgers, bats, owls squirrels and the amphibious creatures around the river and the fields where houses are proposed.
	Little consideration to the clean air policy around the local primary school with all the potential building and additional traffic after the development contradiction of PfE own policy.
	Little detail or consideration of infrastructure requirements / improvements for the area.
	What is required and how would it be funded. ie: Doctors surgeries, Dental practices, local A&E Hospitals, local schools (primary may be mentioned but what about secondary schools? Not forgetting Police, and Fire services all of which are over subscribed with existing residents. New houses will bring in people from other areas which in turn will just put more demand on these already stretched and stressed services. Waiting times will increase further.
	In addition there is waste and refuse which is already under pressure following closure of local refuse sites.
	No consideration of local communities that use this popular area by walkers, rambling groups, family outings, cyclists, horse riders, dog walkers and a multitude of outdoor activities.
	It is also apparent that the broker who sold this deal to the developers on the land is the son of the planning leader of RMBC and Heywood Township so there has been conflicts of interest on this whole proposed development.
	Insufficient consultation time
Redacted modification	As the vision says it is to use Brownfield sites first, then carry out that vision.
 Please set out the modification(s) you 	Protect our greenbelt and remove this site from the plan.
	Hold formal meetings with local residents and allow them to have their input.

Hold formal meetings with local residents and allow them to have their input. consider necessary to

plan legally compliant

make this section of the After all, duty of care to co-operate should be paramount.

Places for Everyone Representation 2021

and sound, in respect of any legal compliance or soundness matters you have identified above.	Follow the Gunning Principles.	
	Review the proposals in line with the strategic objectives and promise the community not to deviate.	
	Involve independent local people representatives onto the planning committee to review on behalf of the communities to ensure the wishes of the communities are fully understood and fulfilled.	
	Be fair and open and transparent with future consultations allowing sufficient time frames to allow residents the time to undertake appropriate actions and generate formal responses.	
	Voting by council members on these issues and planning approvals should be mandatory for all members. ie: no one allowed to miss the votes as was the case when RMBC approved the plan to go to this stage, clearly unfair and biased towards Labour members if this doesn't happen.	