

Places for Everyone Representation 2021

Family Name	Ripley
Given Name	Anne
Person ID	1286327
Title	Stakeholder Submission
Type	Web
Include files	PFE1286327_RochdaleGrowthPlan.pdf PFE1286327_RailCorridorStrategy.pdf PFE1286327_StatementOfCommunityInvolvement.pdf
Family Name	Ripley
Given Name	Anne
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Title	Our Vision
Type	Web
Include files	PFE1286327_StatementOfCommunityInvolvement.pdf PFE1286327_RailCorridorStrategy.pdf PFE1286327_RochdaleGrowthPlan.pdf
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>Not Justified:</p> <p>The Places for Everyone plan is not Justified and there fore unsound as there are significant inconsistencies between the main plan document and many of the supporting documents including minor typographical differences eg still referring to the GMSF in many places, inconsistent time frames in supporting evidence. The plan period is 2021 -2037, but tables in supporting documents refer to several other time frames.</p> <p>Not Legally Compliant - Failure of Community Involvement and Consultation: Consultations have taken place in 2014; 2015; 2016 and 2019. The first two consultations were poorly publicised and had a very low number of responses, especially from individuals. There is confusion over how many people responded to the 2015 consultation on the Vision, Strategy and Strategic Growth options. The the reported number is 180, but a FOI request to the GMCA resulted in a spreadsheet with 58 responses, many of which were from developers. This consultation set the parameters for the whole plan including the decision to opt for GMSF Growth Option 2 "Meeting Assessed Needs" and use an accelerated growth scenario of around 2.4% per annum (ie 46% over the 16 year period of the plan). Had a different, lower growth option been chosen there would have been no requirement to release Green Belt land for housing and industrial use. These key parameters which shaped the whole GMSF/PfE were based on consultation with a tiny number of the 2.7million population of Gtr Manchester and are still in use 6</p>

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	<p>years later. The early stages of this plan were flawed and the strategies should be re-visited in the context of Gtr Manchester as it is today and taking account of changes brought about by the recent pandemic and Brexit.</p> <p>Failed in Duty to Cooperate:</p> <p>In producing the PfE the GMCA have not complied with the full requirements of the Duty to Cooperate with neighbouring boroughs. As a result of Stockport Council voting to withdraw from the GMSF they have been removed from the plan. The GMCA set up a NEW committee to re-issue the significantly amended plan as Places for Everyone. As a neighbouring borough the remaining 9 councils in the PfE have a duty to cooperate with Stockport. This cannot have happened yet as Stockport are known to have a shortfall of land for their Local Housing Need of 11,097. Stockport Local Plan will undergo Reg 18 consultation in Autumn 2021, but PfE is undertaking a Reg 19 consultation before they have determined whether the other 9 boroughs are able to satisfy some of Stockport's unmet need. Indeed Salford has capacity for over 15,000 additional homes which could be made available to Stockport. For this reason the Duty to Cooperate has not been satisfied.</p> <p>In addition Brexit took place quickly followed by the Covid pandemic both of which are likely to mean significant changes to the economy, housing and industry in the, however neither of these events have been deemed significant enough to amend the plan.</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>All supporting documents should be re-written to ensure they consistent, relevant and up to date with the current PfE plan.</p> <p>The Regulation 19 examination should halt and a regulation 18 consultation should be drawn up to accommodate the needs of Gtr Manchester in 2021, not 2015.</p> <p>The plan should be withdrawn until discussions have taken place with Stockport Council.</p>
<p>Family Name</p>	Ripley
<p>Given Name</p>	Anne
<p>Person ID</p>	1286327
<p>Title</p>	JPA 19: Bamford / Norden
<p>Type</p>	Web
<p>Include files</p>	<p>PFE1286327_RochdaleGrowthPlan.pdf PFE1286327_RailCorridorStrategy.pdf PFE1286327_StatementOfCommunityInvolvement.pdf</p>
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<p>Compliance - In accordance with the Duty to Cooperate?</p>	Yes

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1. RMBC Statement of Community Involvement

On 5th August 2021 RMBC adopted a new Statement of Community Involvement (see supporting document uploaded) which stated:

“1.3 In light of the Government’s current guidance to help combat the spread of coronavirus (COVID-19), the Council has undertaken a review of this SCI. As a result, it has been necessary to make temporary amendments to the consultation methods contained in it to allow plan making to progress in line with guidance including requirements for social distancing and to stay at home and away from others. Along with these temporary changes, the Council is also proposing to remove its requirement to consult on future updates to SCIs. There is now no longer a requirement in legislation to consult on updates to an SCI which was confirmed in recent Government Guidance on plan making issued in response to the COVID-19 Pandemic.

1.4 We hope to provide appropriate opportunities for engagement by consulting the community where we can, and increasing the ways in which information is made available. We will prepare all future planning documents and determine all planning applications in line with the procedures established by this statement

2.4 Meet the legislative requirements for community engagement as a minimum, while considering proactive opportunities to involve the community as set out in the rest of this document;

- Use the Council’s website as the primary point for publicising consultation, hosting supporting information and providing an up-to-date position whenever possible;
- Encourage consultation responses to be made electronically, either through the online consultation system or by e-mail, while continuing to receive responses by post if that is necessary (note that electronic responses enable much easier sharing / viewing of consultation responses);
- Notify Specific Consultees named in the legislation together with others as appropriate electronically by preference (or otherwise by letter if essential);
- Explore opportunities for innovative methods of engagement including virtual exhibitions, digital consultations, video conferencing and use of social media (or other technology), where appropriate, to reach different groups of the community;
- Monitor the use of consultation / engagement methods used including innovative methods to ensure they are effective and if necessary modify them accordingly;
- Make available to view hard copies of all relevant information at the Council Offices and in at least the four main township Libraries (Rochdale, Middleton, Heywood and Littleborough). [In light of the COVID-19 outbreak, it is not currently possible to achieve this. All relevant information will be made available on the Council’s website. The situation will be kept under review and modified as required and in accordance with Government guidance.]; and
- Ensure all consultation stages and the methods used are fully inclusive and provide all groups with the opportunity to become involved should they wish to.”

These changes to community engagement were passed even though all Covid restrictions ended on the 19th July over 2 weeks before, and as such RMBC have effectively taken the opportunity to exclude several vulnerable groups from planning consultations forever.

For any residents with no internet access the only way they can participate is to go to one of four public libraries to view the few documents available there. I visited Heywood library with my REDACTED TEXT Mother and there were 2 full copies of the Main Plan document (468 pages long and over

120,000 words), a Statement of Community Involvement and a map of the policies which was illegible. None of the supporting documents were available for her to see and there was no summary to take away and read at leisure. The documents had to be viewed in the library, which would have taken hours to read.

This SCI not only excludes the elderly, but also anyone who relies on a mobile phone for internet access, which many poorer and more vulnerable members of society are forced to do. As the libraries are only open from 9.30 – 4.30 Monday to Friday (ie during normal working hours) anyone who does not have sufficient access to internet at home is excluded from this consultation. There were no work-shops and no drop-in sessions as has happened in previous consultations. Attempting to make a sensible response to this consultation on a mobile phone is impossible and local councillors have received numerous requests for help from bewildered pensioners who are furious about the potential loss of green belt and wish to have their opinions noted, but feel unable to access any help or support as they have no internet access.

As a result, certainly in Rochdale and probably in other boroughs, it is considered that the PfE plan is unsound as it has failed to comply with the statutory duty to consult with members of the public as stated in their own SCI:

“2.4 Ensure all consultation stages and the methods used are fully inclusive and provide all groups with the opportunity to become involved should they wish to.”

It is our view therefore that the consultation process has been flawed with insufficient active engagement with wider community groups and those harder to reach within the local community.

Modification required:

The PfE is not deemed to be legally compliant and further active engagement is required in advance of submission of the Plan for Examination to demonstrate that the Plan is sound

2. Site Selection Criteria

Of the 7 Site Selection Criteria, JPA 19 fails to fulfil 6 criteria. JPA 19 is included in the PfE on the premise that it fulfils Criterion 7 of the Site selection Criteria which states (from the Site Selection Background Paper):

“6.36 Criterion 7 relates to sites which can demonstrate direct link(s) to addressing a specific local need. To meet this criterion a site would be required to bring benefits across a wider area than the development itself and/or would bring benefits to existing communities.

The type of benefits that potential sites could deliver are:

- i. Provide deliverable sites for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end market housing area and / or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north,
- ii. Provide a specific type of housing to meet a locally identified need, e.g. older persons accommodation,
- iii. Development would allow for the re-use and enhancement of an at-risk heritage asset,
- iv. Development would allow for the provision/retention of unviable community facility e.g. sports pitches,
- v. Development would deliver significant highway improvements which will help to resolve existing issues in the wider area.
- vi. Development that can contribute to the delivery of additional healthcare and other wellbeing facilities.”

In fact:

- JPA 19 does not include specific accommodation for a local need eg Older persons accommodation;
- Development would not enhance an at-risk asset
- Development would not provide or maintain an unviable sports facility. The land is already widely used by a thriving football club, tennis club and cricket club.
- There are no plans for highway improvements in this development
- There are no plans for additional healthcare facilities

JPA 19 does not comply with 5 out of the 6 subsections of Criterion 7 either. The final sub section is either to diversify the housing market, or to capitalise on the existing housing market. This development would not diversify the housing market and so the only possible reason that it has been included is because it is deemed to be an “aspirational” area, already full of high end houses and RMBC would like to “capitalise” on that.

It is difficult to envisage the local benefits that would be delivered to Bamford, an area full of high end houses, by building more high end houses on Bamford’s last remaining publicly accessible green belt land.

In addition, this is not consistent with planning guidelines as NPPF para 140 states the need for exceptional circumstances to be fully evidenced and justified to allow development on green belt.

Given that this site performs strongly in 3 out 5 of the green belt criteria in the independent LUC green belt assessment for the GMSF 2016, it is difficult to see how Criterion 7 can be used to justify exceptional circumstances to build on green belt.

3. Rochdale Housing Need

In the plan document, para 7.13 shows Rochdale’s land supply before allocations of 7,997. Its government mandated LHN figure is 8,048 (calculated as $5037 \times 16 = 8,048$), therefore there is an unmet need of 51 houses over the period of the plan. Given the likelihood of windfall sites coming forward, which have not been allowed for in the land supply figure, it would appear that Rochdale have met their housing need target and have no requirement to release any green belt land for housing.

However, RMBC propose to release sufficient land to build an additional 4,006 houses on largely green belt land. This would lead to a total over the plan period of 12,003 houses. Why there is this 50% increase on the LHN is not evidenced anywhere and is obviously not justified or consistent with achieving sustainable development. The additional 4006 houses on green belt land (including JPA 19) are clearly not consistent with NPPF policy on sustainable development (paras 7 to 14) and on making effective use of land (paras 119 to 123) and protecting green belt (paras 137 to 146).

The OAN has not been positively prepared to meet the housing need, it has been wildly inflated, and therefore, the plan with respect to Rochdale and particularly JPA19 is not sound.

There is considerable confusion over the total number of houses RMBC propose to build in the near future. In addition to the PfE the “Rochdale Growth Plan 2020-2030” and “Rochdale Rail Corridor” (see evidence uploaded) lists several other developments that are planned, including:

Town centres 2,000

Rochdale Rail Corridor 7,500

N Middleton/S Heywood 1,500

Mills Hill 400

It appears that these are separate to the PfE as PfE does not reference these schemes and the documents themselves do not reference PfE. Prima facie it seems Rochdale plans to deliver 12,000 PfE homes plus 11,000 more, a total of 23,000 against a LHN of 8,048.

Presumably there is some overlap in some of these developments, but there are significant numbers of houses listed that are included in stand alone projects and are not part of the PfE. There can be no justification for including 4000 houses on green belt sites when there is obviously sufficient land available for more than the LHN.

N.B. The Rochdale target LHN of 9,858 in the PfE is a spurious number which is not objective. It is simply the true Government target LHN of 8,048 multiplied by an aspirational uplift of 122.5% to give 9,858.

All green belt policies in Rochdale should be removed from the PfE until a thorough investigation of the housing need has been undertaken.

4. PfE Objectives

Underpinning PfE there are 10 strategic objectives. JPA 19 doesn't fulfil 8 of these, one does not apply and the final one is barely applicable.

Objective 1 – meet our housing need

Developing houses on JPA 19 will not: increase the number of affordable homes; or provide a diverse mix of dwellings. It will increase the net additional dwellings, but there is no need to build on green belt to do this. It is hardly an exceptional circumstance as defined in the NPPF para 140.

Objective 2 – Create neighbourhoods of choice

Developing houses on JPA – 19 is not building on brownfield land, it is destroying green belt land; JPA 19 is not in a core growth area; it is not within 800m of a public transport hub; it is not situated to prioritise sustainable modes of transport, but it is in an area at high risk of flooding as the water table is only a few centimetres below the surface.

Objective 3 – Playing our part in ensuring a thriving and productive economy in all parts of Gtr Manchester

Building high end housing on a green belt site will have negligible contribution to the economy of Gtr Manchester.

Objective 4 – Maximise the potential from our national and international assets

No applicable to JPA 19

Objective 5 – Reduce inequalities and improve prosperity

High end homes in an area full of high end homes does nothing to improve prosperity. The site is not located near any public transport hub and most journeys will be by car.

Objective 6 – Promote sustainable movement of people, goods and information

There are no plans in the PfE to bring public transport hubs any nearer to this site. There is an "aspiration" for a high speed bus route to Heywood – 30 minutes walk away. High end houses will mean more cars on an already congested road which is 300m away from an AQMA. The main access road to and from the site runs directly into this AQMA. To mitigate the pollution there is a proposal for a one-way system, but this is unlikely to reduce the pollution, it will just distribute it further afield.

Objective 7 – Ensure that Gtr Manchester is a more resilient and carbon neutral city-region

I cannot understand how building houses on green belt land which is a carbon sink can do anything other than exacerbate CO2 emissions in Gtr Manchester. In addition, research by RICS shows that 51% of a houses

carbon emissions are produced during the build phase. During the life of the house it will produce on average 4 tonnes CO2 per annum, therefore 450 houses will be producing 1,800 tonnes CO2 pa, and the carbon sink effect of grassland will be lost, but, unfortunately I am unable to calculate this figure. Suffice to say building on green belt does not lead to a carbon neutral city.

Objective 8 – Improve the quality of our natural environment and access to green spaces

It is obvious that building on this site will not fulfil this objective.

Objective 9 – Ensure access to physical and social infrastructure

There are no plans for any additional doctors, dentists, schools or hospitals to serve up to 1,500 potential additional residents. School places and doctors appointments are likely to be a bun fight or a lottery.

Objective 10 – Promote Health and well being

It is obvious that building on this site will not fulfil this objective.

Site Delivery

There are several significant barriers to the delivery of this site which should be noted:

- The developer only owns 8.8 ha (24%) of the site and the majority landowner (33%) is on public record stating he does not wish to sell. Compulsory Purchase of green belt land to build unnecessary large executive homes does not fit well with the principles of the NPPF
- There is no evidence of any Archaeological Surveys and given the evidence in the Historic and Environmental Assessment by Salford University states “the general lack of development within the site shows that there is a high potential for archaeological remains due to the lack of disturbance.” Should such a survey be undertaken the author deemed it likely that historic remains may well be discovered.
- United Utilities report that there are several high-pressure water mains running under the site.
- As discussed in Objective 2, the site is a major flood risk, yet there has only been a desktop survey
- The antiquated drains are likely to need upgrading significantly
- A band across the middle of the site is classified as High-Risk Development Land due to past mining activities.
- The transport infrastructure has not been adequately addressed and extensive infrastructure improvement is likely.

Of the 10 strategic objectives and the 7 site selection criteria, JPA 19 fails to fulfil any of them in any meaningful way. The only reason this site is included is that it’s in an “aspirational” area. This does not constitute exceptional circumstances to release green belt land. Therefore, this policy is unsound and JPA 19 should be removed forthwith.

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.

Modifications requested:

BGBAG request that JPA-19 Bamford/Norden should be removed from the PfE as this policy is unsound.

In addition, BGBAG request that Criterion 7 is deleted from the list of Site Selection Criteria along with the 5 sites which only fulfil Criterion 7 of the Site Selection Criteria. These are: JPA 9 - Walshaw; JPA 17 - Land South of Coal Pit Lane; JPA 19 - Bamford/Norden; JPA 27 - East of Boothstown; JPA 32 - South of Hyde as they are not sound because they are not consistent with NPPF para 140.

In the PfE consultation Rochdale Borough Council did not engage sufficiently with wider community groups and so the PfE is not deemed to be legally

compliant and further active engagement is required in advance of submission of the Plan for Examination to demonstrate that the Plan is sound