

Places for Everyone Representation 2021

<b>Family Name</b>	Tilstone
<b>Given Name</b>	Jeanette
<b>Person ID</b>	1287444
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287444_FloodedStreet_Redacted.pdf</a> <a href="#">PFE1287444_FloodRisk.jpg</a>
<b>Family Name</b>	Tilstone
<b>Given Name</b>	Jeanette
<b>Person ID</b>	1287444
<b>Title</b>	JPA 2: Stakehill
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287444_FloodRisk.jpg</a> <a href="#">PFE1287444_FloodedStreet_Redacted.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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.</b>	<p>The plan is unrealistically aspirational &amp; therefore unsound: it lacks ambition to truly improve the health and well-being of residents; protect the individuality and heritage of the different towns and villages within GM; and radically change the patterns of behaviour that are currently contributing to poor air quality, traffic congestion and flood risk. This is illustrated by the choice of strategic locations for development: all juxtaposed to existing motorways and industrial estates.</p> <p>Despite an iteration in 2014 which did not propose any Green Belt release, the Local Councils and the GMCA have pursued a version through 3 further iterations which is entirely predicated upon the release of Green Belt with an overprovision for housing land. The plan fails to suitably assess a number of brownfield sites or to assess other reasonable alternatives in advance of the release of land from the Green Belt.</p> <p>The entire evidence base is inconsistent, with policies and calculations spanning differing time periods. The strategies' aims and objectives conflict e.g. policy JP-S2, JP-S5 &amp; JP-S6 and Councils' declaration of climate emergencies are completely at odds with proposals at Stakehill to build over 200 hectares of green space that currently acts as a carbon sink; reduces flood risk; supports local residents' health and well-being, in addition to supporting biodiversity and wildlife. The evidence base does not include any estimates of the likely scale of carbon emission consequences of the developments proposed and green space lost - this is a serious omission.</p> <p>Slattocks roundabout, Rochdale Road &amp; Church Avenue regularly flood following heavy rain and the addition of over 1600 new homes to the NE of</p>

this area cannot be sustainable (see uploads attached: 1) Government flood warning for the area- accessed 1/10/21 2) photo taken earlier this year of water pouring down Church Avenue onto Rochdale Road. Other video evidence is available on request.

Air quality monitoring undertaken locally in Dec 2019 in conjunction with the British Lung Foundation showed levels of NO2 on Rochdale Road in Slattocks exceeded safe limits.

The COVID-19 pandemic has meant that the public footpaths and byways across the Stakehill & Slattocks area have seen significantly increased usage. This has been sustained into late 2021 and contributes to the physical and mental health and well-being of both local residents and visitors to the area. The loss of these areas of Green Belt would be in direct conflict with policy JP-P6.

In the previous (2016) GMSF consultation an overwhelming proportion of dissent was received for the "Northern Gateway" areas, and yet the proposals for these areas remain virtually unchanged in this PfE plan. There is a general feeling amongst residents that development companies been given stakeholder opportunities whilst residents were kept in the dark. This is inequitable because developers have a vested interest in the release of Green Belt land for housing.

Rochdale MBC has not conformed to its legal duty under the "Statement of Community Involvement" for PfE Consultation: it has only provided minimum opportunities for residents without internet access to participate, in the form of 2 copies of the Main plan along with a Map of Policies (which was illegible) in each of the libraries that were open. There were no workshops or drop in sessions. Also the Council did not follow due process following the concerns raised at the Overview & Scrutiny Committee (July 21) regarding public consultation.

Deliverability of the plan in this area is partly predicated upon a proposed new railway station at Slattocks - please note this idea has proposed for at least 31 years and on that basis should not be considered as a likelihood within the plan period.

Throughout the plan, developers appear to have been invited to submit concept plans for housing development. None have offered green innovation.

Using 167ha Green Belt land to build >1500 executive homes in a semi-rural village which currently has around 900 homes, does not in any way satisfy the "exceptional circumstances" required to justify the release of this land; there are no local benefits to building 1650 homes on this site and the local rural economy and residents would be severely adversely affected. Farmland is part of the food production industry, its destruction for housing and commercial development increases reliance on imported food and destroys farming livelihoods. Removing farmland is in opposition to the food security of our region and makes little sense.

There will be significant harm caused by:

- o Loss of protected Green Belt
- o Loss of public access to green space
- o Increased congestion on roads.
- o Over-crowded schools
- o Increased urban sprawl and a merging of the distinct areas of Middleton, Slattocks, Chadderton Fold and Royton.
- o Deterioration in air quality near a primary school
- o Increased pollution and CO2 from additional buildings and traffic
- o Increased flooding risk
- o Loss of a carbon sink

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	<ul style="list-style-type: none"> <li>o Worsening access to GP facilities</li> <li>o Loss of ancient hedgerows and mature trees</li> <li>o Loss of habitats for wildlife</li> </ul> <p>The proposed "addition to Green Belt" (Land west of Stakehill Business Park) would rebadge playing fields and allotments and is an insult to the intelligence of local residents.</p>
<p><b>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.</b></p>	<p>Recalculation of warehousing need based upon post-Covid19 working habits and recalculation of housing need based upon population growth and plausible occupancy rates.</p> <p>Calculation of the carbon consequences of the plan, and ensure alignment with the Councils' declarations of climate emergency.</p> <p>Totally revise the plan to focus on delivering development on sustainable previously developed land, remediating and regenerating the areas within Manchester that need the investment, and protect the amenity and quality of the Green Belt from unjustified and unnecessary encroachment. Rochdale MBC should develop and communicate their local plan in line with their Statement of Community Involvement: ideally this should be a community led plan as opposed to a developer led plan, because local people have a much better understanding of the needs and aspirations for their area.</p>
<b>Family Name</b>	Tilstone
<b>Given Name</b>	Jeanette
<b>Person ID</b>	1287444
<b>Title</b>	Rochdale - Green Belt Additions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287444_FloodedStreet_Redacted.pdf</a> <a href="#">PFE1287444_FloodRisk.jpg</a>
<b>GBA Rochdale - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	Rochdale GBA19 Land to west of Stakehill Business Park
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>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</b>	<p>The proposed "addition to Green Belt" (Land west of Stakehill Business Park) would rebadge playing fields and allotments - which are already "green space" and is an insult to the intelligence of local residents.</p> <p>The only benefit to "adding in" these new areas is to appear to reduce the figure for Green belt loss.</p>

<b>co-operate. Please be as precise as possible.</b>	
<b>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.</b>	Remove all Green Belt site allocations from the plan, and forget the 'additions'!
<b>Family Name</b>	Tilstone
<b>Given Name</b>	Jeanette
<b>Person ID</b>	1287444
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287444_FloodRisk.jpg</a> <a href="#">PFE1287444_FloodedStreet_Redacted.pdf</a>
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>Much of the 'evidence' has been brought forward from previous iterations of the GMSF &amp; hasn't been updated. The entire evidence base is inconsistent, with policies and calculations spanning differing time periods.</p> <p>Much of the evidence for site allocations e.g. geo-environmental assessments, historical assessments, has been prepared by, or funded by development companies who have a direct conflict of interest.</p>