

Places for Everyone Representation 2021

Family Name	Cooper
Given Name	Wendy
Company / Organisation	Save Shaw's Greenbelt Group
Person ID	1287063
Title	Stakeholder Submission
Type	Web
Include files	PFE1287063_HousingLandSupply_Redacted.pdf PFE1287063_JPH4_Redacted.pdf PFE1287063_MedianHousePrices.png
Family Name	Cooper
Given Name	Wendy
Company / Organisation	Save Shaw's Greenbelt Group
Person ID	1287063
Title	Our Vision
Type	Web
Include files	PFE1287063_MedianHousePrices.png PFE1287063_HousingLandSupply_Redacted.pdf PFE1287063_JPH4_Redacted.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>Why is this Site not actually listed when it is being referred to in the plan's vision and there is no-where that we can comment on it! We have commented on it here.</p> <p>High Crompton Broad Location (Kingsway South)</p> <p>Whilst it is noted that the site itself is not proposed for allocation within the Plan, it is referred to in relation to draft Policy JP-Strat 7 as a potential opportunity for further expansion of the economic and residential offer in the eastern most part of this key gateway allocation. The</p>

site is therefore noted to have been included on the Key Diagram. However, the site will be retained as Green Belt until such a time as is necessary. This is clearly unacceptable as the Plan is in effect seeking to allocate the site without due assessment of its suitability, nor an assessment of reasonable alternatives. The policy and key diagram are therefore ineffective, not positively prepared and not consistent national policy, and both should be fully amended to remove the reference to this site from the Plan. The Plan should be duly amended to simply show the land as being retained within the Green Belt. Failure to do so will mean the Plan is not legally compliant, in circumstances where it will be proposing amendments to the boundary of the Green Belt outside of due process, to be allocating a site without sufficient justification or assessment of alternatives, and the approach put forward flies in the face of the need for a Plan led system.

It is also unclear whether the site at High Crompton will be delivering development over and above that set out within the policy and if so to what scale. PfE as drafted would appear to indicate that the site will be released from the Green Belt within the Oldham Local Plan when required, regardless of the fact it is not addressed in detail within the regional plan. The lack of clarity as to what would constitute it being necessary for release is also of concern and provides no certainty to residents as to the tests which would need to be met for the site to be justified for release. This is unduly ambiguous and unreasonable. In reality, on the basis of the information currently available, the land should be retained within the Green Belt and reference to it deleted from the Plan.

It is therefore our view that as drafted policy JP-Strat 7 is unduly ambiguous and weighs unreasonably in favour of land release and not land protection. The policy is therefore deemed to be unsound as it has not been sufficiently justified and is ineffective. To address the test of soundness we would suggest that draft policy JP-Strat 7 be deleted, alongside Draft Allocations JPA1.1 and JPA 2. Further, that Draft Allocation JPA 1.2 be reviewed.

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.

High Crompton Broad Location (Kingsway South)

Whilst it is noted that the site itself is not proposed for allocation within the Plan, it is referred to in relation to draft Policy JP-Strat 7 as a potential opportunity for further expansion of the economic and residential offer in the eastern most part of this key gateway allocation. The site is therefore noted to have been included on the Key Diagram. However, the site will be retained as Green Belt until such a time as is necessary. This is clearly unacceptable as the Plan is in effect seeking to allocate the site without due assessment of its suitability, nor an assessment of reasonable alternatives. The policy and key diagram are therefore ineffective, not positively prepared and not consistent national policy, and both should be fully amended to remove the reference to this site from the Plan. The Plan should be duly amended to simply show the land as being retained within the Green Belt. Failure to do so will mean the Plan is not legally compliant, in circumstances where it will be proposing amendments to the boundary of the Green Belt outside of due process, to be allocating a site without sufficient justification

or assessment of alternatives, and the approach put forward flies in the face of the need for a Plan led system.

It is also unclear whether the site at High Crompton will be delivering development over and above that set out within the policy and if so to what scale. PfE as drafted would appear to indicate that the site will be released from the Green Belt within the Oldham Local Plan when required, regardless of the fact it is not addressed in detail within the regional plan. The lack of clarity as to what would constitute it being necessary for release is also of concern and provides no certainty to residents as to the tests which would need to be met for the site to be justified for release. This is unduly ambiguous and unreasonable. In reality, on the basis of the information currently available, the land should be retained within the Green Belt and reference to it deleted from the Plan.

It is therefore our view that as drafted policy JP-Strat 7 is unduly ambiguous and weighs unreasonably in favour of land release and not land protection. The policy is therefore deemed to be unsound as it has not been sufficiently justified and is ineffective. To address the test of soundness we would suggest that draft policy JP-Strat 7 be deleted, alongside Draft Allocations JPA1.1 and JPA 2. Further, that Draft Allocation JPA 1.2 be reviewed.

Within the detailed strategic objection to the Publication Plan, the local community have significant concerns with the proposed release of Green Belt land. Residents consider that this approach has not been sufficiently justified by the Greater Manchester Combined Authority, and that insufficient consideration has been given to increasing densities of development within urban areas, and supporting developers and landowners to secure efficient and effective viable re-use of brownfield land.

The GMCA have opted for an apparent Green Belt first strategy in meeting the needs of Greater Manchester over the plan period, contrary to the provisions set out within the Plan and this is simply unacceptable. In addition, and as set out above, the GMCA are proposing to allocate sites which provide a strategic function within the Green Belt and whose openness should be preserved.

We believe the proposed sites in Oldham do not demonstrate sustainable locations for development and raise significant development control concerns including access, highways, sustainability which do not justify their allocation for development. We therefore ask that these sites be deleted from the Plan.

We would ask that officers within the GMCA pay due regard to the concerns of the local community and revisit their proposals for the release of Green Belt to meet the housing and economic needs of the local area.

Family Name

Cooper

Given Name

Wendy

Company / Organisation

Save Shaw's Greenbelt Group

Places for Everyone Representation 2021

Person ID	1287063
Title	JPA 12: Beal Valley
Type	Web
Include files	PFE1287063_HousingLandSupply_Redacted.pdf PFE1287063_JPH4_Redacted.pdf PFE1287063_MedianHousePrices.png
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>- Homes: We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be seen to be being realistic. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.</p> <p>- Affordable housing: The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of 2 policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound.</p> <p>We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.</p> <p>- Green Belt: The Plan sets out an area of Green Belt release to meet the perceived housing need across the nine authorities. However, insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the</p>

High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been insufficient assessment of reasonable alternatives. In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.

- Case for Very Special Circumstances: The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.

- Evidence Base: As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.

- Allocations: A significant number of the proposed site allocations are unjustified and not well located. Many of the sites will have detrimental impacts on the highway network, are at risk from flooding and not well located for access to services, facilities and public transport. Many others will have significant impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. These proposed allocations are therefore deemed to be unsustainable and unjustified and should not be being promoted. The proposed allocations should be reassessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan. In short, we are asking that the Plan ensure the delivery of the right homes in the right places, and the deletion of inappropriate and undeliverable sites from the Plan.

- Covid-19: Insufficient consideration has been paid within the Plan to the long term impacts of Covid, both on the economy and on human behaviours. It is clear that Covid has had a significant impact on the national economy, and whilst we are in a period of recovery, the long term impacts on the high street are clear to see. The plan has failed to assess the

impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use

3 redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. Whilst the GMCA argue that the impact of the pandemic is too early to fully understand, there are clear trends resultant that are already apparent, and which could have a determinative impact on development within Greater Manchester. The Plan is therefore unsound as it fails to adequately assess current circumstances and is once again not prepared on the basis of a sound and robust evidence base. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, its High Streets and general housing and employment land requirements.

We have put in a FO

I request (in conjunction with Save Royton's Greenbelt) regarding the Local Plan consultation Oldham has 76 unlisted mills, some of which should be convertible to housing. We filed an FOI and the council refused to give us the information:

https://www.whatdotheyknow.com/request/oldhams_mills_strategy. By doing so, and by failing to survey this land for GMSF/PfE I believe we have an argument that Oldham's GB release is not compliant with NPPF #141 (which explicitly addresses the conditions for GB release: <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

Copy of the letter is attached in the documents section.

This information we believe is vital to the decision making behind the plan. Without this information it is impossible to have an informed opinion on the use of Brownfield sites and their regeneration.

The Local Housing Need methodology increases Oldham's target by 44 homes per year as part of the affordability adjustment (pg. 34-36 of the Strategic Housing Market Assessment paper). Over 16 years this amounts to roughly 700 homes. We believe that the affordability problem in the Oldham Borough are severely distorted, stemming mostly from Saddleworth.

It is evident that the building of affordable homes in the GB in other parts of Oldham is due to the affordability problem in Saddleworth and this opens up a two-fold argument:

oEffectively it is being argued by OMBC that affordability is an exceptional circumstance for the allocated houses. It is highly questionable that the affordability adjustment complies with NPPF #140. These houses are not being built to serve housing need, but rather to expand market choice.

oAllocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.

	<p>Validity and Legal Status of the Consultation Process</p> <p>Discrimination and Equality Act 2010</p> <p>The consultation process is flawed in the following ways. There has been a systematic disregard for broad community involvement. We requested that OMBC write to every household informing them of the consultation and we were advised by their head of planning that they had no legal obligation to do so. We find this discriminatory as it excluded anyone without access to the internet which is where the consultation is being held.</p> <p>There has also been complete disregard for loss of community identity, things like Beating of the Bounds which is a walk that is carried out every 7 years around the boundaries of Shaw & Crompton. This is a historical event and an event where the community of Shaw are involved. Building all these houses would see this sort of community identity eradicated as the plans are creating urban sprawl. We feel there has been no consideration about keeping each town's identity within Oldham.</p> <p>We also feel that there has been a disproportionate allocation of houses within Shaw & Crompton within the Oldham Borough, without any regard for services and road infrastructure. There are nearer 4,000 houses planned within Shaw & Crompton, calculating all the other planning applications not included in Places for Everyone.</p> <p>Build Back Better - What about climate change? This needs to be taken into consideration, and set out in these plans. It has not been considered.</p> <p>-</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>Family Name</p>	<p>We would therefore ask that this allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town centres and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework.</p> <p>Brownfield Housing Fund Allocation to be accessed.</p> <p>To be compliant with the Discrimination and Equality Act 2010, we would require OMBC to at least have written to every household in the Borough, informing residents of the process in writing (This is well within the scope of the consultation and the capabilities of the Council who produce a quarterly newsletter which is distributed to every home in the Borough). There are 2.7 million adults in the UK (ONS Figures) that do not have access to the internet and this should have been taken into consideration.</p> <p>The percentage of people with access to a computer or a device to be able to access the consultation documents (this is further compounded by the size of the documents available for download from the GMCA consultation site, being able to view these on a phone is next to impossible) is higher in Oldham, simply because of the demographic of the area, particularly in Shaw which has a high population of elderly residents.</p> <p>Cooper</p>

Places for Everyone Representation 2021

Given Name	Wendy
Company / Organisation	Save Shaw's Greenbelt Group
Person ID	1287063
Title	JPA 14: Broadbent Moss
Type	Web
Include files	PFE1287063_MedianHousePrices.png PFE1287063_HousingLandSupply_Redacted.pdf PFE1287063_JPH4_Redacted.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>- Homes: We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be seen to be being realistic. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.</p> <p>- Affordable housing: The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of 2 policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound.</p> <p>We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.</p> <p>- Green Belt: The Plan sets out an area of Green Belt release to meet the perceived</p>

housing need across the nine authorities. However, insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been

insufficient assessment of reasonable alternatives. In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.

- Case for Very Special Circumstances: The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.

- Evidence Base: As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.

- Allocations: A significant number of the proposed site allocations are unjustified and not well located. Many of the sites will have detrimental impacts on the highway network, are at risk from flooding and not well located for access to services, facilities and public transport. Many others will have significant impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. These proposed allocations are therefore deemed to be unsustainable and unjustified and should not be being promoted. The proposed allocations should be reassessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan. In short, we are asking that the Plan ensure the delivery of the right homes in the right places, and the deletion of inappropriate and undeliverable sites from the Plan.

- Covid-19: Insufficient consideration has been paid within the Plan to the long term impacts of Covid, both on the economy and on human behaviours. It is clear that Covid has had a significant impact on the national economy, and whilst we are in a period of recovery,

the long term impacts on the high street are clear to see. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use

3 redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. Whilst the GMCA argue that the impact of the pandemic is too early to fully understand, there are clear trends resultant that are already apparent, and which could have a determinative impact on development within Greater Manchester. The Plan is therefore unsound as it fails to adequately assess current circumstances and is once again not prepared on the basis of a sound and robust evidence base. To seek to address the issue of soundness, we would ask that more detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, it's High Streets and general housing and employment land requirements.

We have put in a FoI request (in conjunction with Save Royton's Greenbelt) regarding the Local Plan consultation Oldham has 76 unlisted mills, some of which should be convertible to housing. We filed an FOI and the council refused to give us the information: https://www.whatdotheyknow.com/request/oldhams_mills_strategy. By doing so, and by failing to survey this land for GMSF/PfE I believe we have an argument that Oldham's GB release is not compliant with NPPF #141 (which explicitly addresses the conditions for GB release: <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

We believe a Brownfield First Approach has not been followed.

This information on Brownfield Sites, we believe is vital to the decision making behind the plan. Without this information it is impossible to have an informed opinion on the use of Brownfield sites and their regeneration.

We believe the pollution and emissions issues have not been taken into consideration, and the damage to peoples health. With disregard for Healthy Lungs.

The Local Housing Need methodology increases Oldham's target by 44 homes per year as part of the affordability adjustment (pg. 34-36 of the Strategic Housing Market Assessment paper). Over 16 years this amounts to roughly 700 homes. We believe that the affordability problem in the Oldham Borough are severely distorted, stemming mostly from Saddleworth.

It is evident that the building of affordable homes in the GB in other parts of Oldham is due to the affordability problem in Saddleworth and this opens up a two-fold argument:

oEffectively it is being argued by OMBC that affordability is an exceptional circumstance for the allocated houses. It is highly questionable that the affordability adjustment complies with NPPF #140. These houses are not being built to serve housing need, but rather to expand market choice.

Places for Everyone Representation 2021

	<p>oAllocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.</p> <p>We also believe there is going to be a disregard for the housing needs of the residents of Shaw & Crompton, with the majority of houses being unaffordable for the wages people earn who live in the area. With not enough houses being also for the elderly which is the demographic of Shaw & Crompton. A lot of people are elderly. There are supporting documents attached.</p> <p>We have attached documents to support our response in the relevant section.</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>We would therefore ask that this allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town centres and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework.</p> <p>Brownfield Housing Fund Allocation to be accessed.</p> <p>To be compliant with the Discrimination and Equality Act 2010, we would require OMBC to at least have written to every household in the Borough, informing residents of the process in writing (This is well within the scope of the consultation and the capabilities of the Council who produce a quarterly newsletter which is distributed to every home in the Borough). There are 2.7 million adults in the UK (ONS Figures) that do not have access to the internet and this should have been taken into consideration. The percentage of people with access to a computer or a device to be able to access the consultation documents (this is further compounded by the size of the documents available for download from the GMCA consultation site, being able to view these on a phone is next to impossible) is higher in Oldham, simply because of the demographic of the area, particularly in Shaw which has a high population of elderly residents.</p>
Family Name	Cooper
Given Name	Wendy
Company / Organisation	Save Shaw's Greenbelt Group
Person ID	1287063
Title	JPA 16: Cowlshaw
Type	Web
Include files	<p>PFE1287063_HousingLandSupply_Redacted.pdf PFE1287063_JPH4_Redacted.pdf PFE1287063_MedianHousePrices.png</p>
Soundness - Positively prepared?	Unsound

Places for Everyone Representation 2021

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>- Homes: We have particular concern in relation to the identified housing need and the fact that the Plan appears to be seeking to overprovide for housing land. The Plan itself and the associated supporting documentation appear to be inconsistent in the identification of a housing need figure, fails to pay sufficient regard to reasonable alternatives and is seeking to be over flexible in relation to land supply. The Plan is therefore deemed to be unsound, as whilst one can argue the Plan has been positively prepared (in terms of its aspiration), it cannot be seen to be being realistic. The Plan should be modified to reduce the overall level of housing land required to meet the needs of Greater Manchester over the plan period.</p> <p>- Affordable housing: The Plan sets out a target for the delivery of affordable housing but leaves the allocation and delivery of such homes to each authority Local Plan process. Such an approach may result in an inconsistent and incoherent application of 2 policy on the delivery of affordable homes across the Greater Manchester region, with some areas potentially seeking lower levels of provision. There is a danger that as drafted local authorities could fail to set out policies which secure the needs of those requiring affordable provision, and as such the Plan could be deemed to be unsound.</p> <p>We would therefore ask that the affordable housing policy within PfE be duly amended to set a standard affordable housing requirement for new development across the Greater Manchester area, to ensure that housing needs are delivered to a consistent level across the Plan area.</p> <p>- Green Belt: The Plan sets out an area of Green Belt release to meet the perceived housing need across the nine authorities. However, insufficient consideration has been given to the allocation of alternative urban sites, including increased densities and better use of the High Street and other brownfield land in advance of releasing land from within the Green Belt. The Plan is therefore unsound as there has been insufficient assessment of reasonable alternatives. In order to address this issue the Plan should be modified to remove all proposed allocations that are currently designated on land falling within the Green Belt, with additional land identified for development within the main urban areas.</p> <p>- Case for Very Special Circumstances: The evidence base to support the case for Exceptional Circumstances to justify the release of Green Belt, is insufficiently robust</p>

and is in fact flawed. The Plan is therefore unsound as it is not currently based on a robust and justified evidence base. The Plan has also not sufficiently assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy.

- Evidence Base: As set out within the Regulations, development plans need to be based on a robust and justified evidence base. The Evidence Base as currently drafted is in fact inconsistent, incoherent and does not support the case for a sound plan. The evidence base needs to be revisited to (1) ensure consistency in approach, assessment and aspirations and (2) to ensure that the Plan being presented at Examination is based on up to date and accurate detail.

- Allocations: A significant number of the proposed site allocations are unjustified and not well located. Many of the sites will have detrimental impacts on the highway network, are at risk from flooding and not well located for access to services, facilities and public transport. Many others will have significant impact on the local environment by way of loss of vegetation, loss of habitat, air pollution, noise pollution, light pollution etc. These proposed allocations are therefore deemed to be unsustainable and unjustified and should not be being promoted. The proposed allocations should be reassessed in relation to their suitability for development, with those within the Green Belt, in unsustainable locations, at risk from flooding or poorly accessed to be removed from the Plan. In short, we are asking that the Plan ensure the delivery of the right homes in the right places, and the deletion of inappropriate and undeliverable sites from the Plan.

- Covid-19: Insufficient consideration has been paid within the Plan to the long term impacts of Covid, both on the economy and on human behaviours. It is clear that Covid has had a significant impact on the national economy, and whilst we are in a period of recovery, the long term impacts on the high street are clear to see. The plan has failed to assess the impact of these changes on the need for additional housing and employment land, nor in relation to the potential provision of mixed-use

3 redevelopments in town centres, with appropriate densities to negate the need for Green Belt release. Whilst the GMCA argue that the impact of the pandemic is too early to fully understand, there are clear trends resultant that are already apparent, and which could have a determinative impact on development within Greater Manchester. The Plan is therefore unsound as it fails to adequately assess current circumstances and is once again not prepared on the basis of a sound and robust evidence base. To seek to address the issue of soundness, we would ask that more

detailed assessment be undertaken of the impact of Covid-19 on Greater Manchester, it's High Streets and general housing and employment land requirements.

We have put in a FoI request (in conjunction with Save Royton's Greenbelt) regarding the Local Plan consultation Oldham has 76 unlisted mills, some of which should be convertible to housing. We filed an FOI and the council refused to give us the information:

https://www.whatdotheyknow.com/request/oldhams_mills_strategy. By doing so, and by failing to survey this land for GMSF/PfE I believe we have an argument that Oldham's GB release is not compliant with NPPF #141 (which explicitly addresses the conditions for GB release: <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>

This information we believe is vital to the decision making behind the plan. Without this information it is impossible to have an informed opinion on the use of Brownfield sites and thier regeneration.

The Local Housing Need methodology increases Oldham's target by 44 homes per year as part of the affordability adjustment (pg. 34-36 of the Strategic Housing Market Assessment paper). Over 16 years this amounts to roughly 700 homes. We believe that the affordability problem in the Oldham Borough are severly distorted, stemming mostly from Saddleworth.

It is evident that the building of affordable homes in the GB in other parts of Oldham is due to the affordability problem in Saddleworth and this opens up a two-fold argument:

oEffectively it is being argued by OMBC that affordability is an exceptional circumstance for the allocated houses. It is highly questionable that the affordability adjustment complies with NPPF #140. These houses are not being built to serve housing need, but rather to expand market choice.

oAllocating these homes outside the problem area means that the policy is not effective i.e. not sound, because building these extra homes in Shaw and Royton will not resolve the affordability issue in Saddleworth.

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.

We would therefore ask that this allocation be deleted from the Plan and that the GMCA re-assess the potential for reasonable alternatives for development within the existing urban areas, including within town centres and other brownfield sites in line with the requirements of section 13, paragraph 141 of the National Planning Policy Framework.

Brownfield Housing Fund Allocation to be accessed.

To be compliant with the Discrimination and Equality Act 2010, we would require OMBC to at least have written to every household in the Borough, informing residents of the process in writing (This is well within the scope of the consultation and the capabilities of the Council who produce a quarterly newsletter which is distributed to every home in the Borough). There are 2.7 million adults in the UK (ONS Figures) that do not have access to the internet and this should have been taken into consideration.

Places for Everyone Representation 2021

The percentage of people with access to a computer or a device to be able to access the consultation documents (this is further compounded by the size of the documents available for download from the GMCA consultation site, being able to view these on a phone is next to impossible) is higher in Oldham, simply because of the demographic of the area, particularly in Shaw which has a high population of elderly residents