

<b>Family Name</b>	Broomhead
<b>Given Name</b>	Caroline
<b>Person ID</b>	1286917
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Broomhead
<b>Given Name</b>	Caroline
<b>Person ID</b>	1286917
<b>Title</b>	JPA 19: Bamford / Norden
<b>Type</b>	Web
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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 plans are not justified and not consistent with national policy. They fail to comply with PfE objectives 7 and 8. There is no evidence to show that there is a shortage of brownfield sites across Rochdale on which to build new housing, therefore it is not justified to build on the precious little green belt land we have.</p> <p>The particular Bamford/Norden area where this housing development is planned for is already extremely busy with car traffic at several times each day. Public transport links for this area are inadequate, particularly for people travelling from Norden to Rochdale and through Bamford. The idea of making Norden Road one-way is ludicrous - it will just shift the already difficult congestion to War Office Road instead.</p> <p>All the local schools are already at full capacity, and the traffic congestion on a daily basis causes stress and anxiety to drivers and pedestrians (and school children).</p> <p>This relatively small green belt area is well used for recreation by the local community. Using it to build 450 detached houses makes it no longer accessible to them and restricts their opportunities for maintaining physical and mental well-being. It is the only green belt area locally in what is a built-up urban environment. The risk of local flooding in this area is already witnessed every year, so building houses on this land will add to the risk.</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</b>	The only modification I am seeking is for JPA 19 Bamford/Norden to be removed from the PfE.

**or soundness matters  
you have identified  
above.**

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<b>Family Name</b>	Brown
<b>Given Name</b>	Andrew
<b>Person ID</b>	1287589
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFEAndrewBrown_Email_Redacted.pdf</a> <a href="#">PFEAndrewBrown_ResponseForm_Redacted.pdf</a>
<b>Family Name</b>	Brown
<b>Given Name</b>	Andrew
<b>Person ID</b>	1287589
<b>Title</b>	JPA 35: North of Mosley Common
<b>Type</b>	Web
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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>I write regarding the proposed Places For Everyone site allocation of JPA35, land north of Mosley Common. I feel there has been a significant oversight in the drawing up of the allocation of this site.</p> <p>1. Traffic</p> <p>Based on the awful traffic situation in the area and the below points I would like to request that the site be allocated altogether, until such a point as the road infrastructure is improved to meet the demands of the area.</p> <p>1.1. Insufficient highways capacity. Other than the addition of the heavily trafficked Ecclestone Farm, the area is served by roads that are much in the same layout and size as they were in 1850. The demands placed upon them are far in excess of what they were designed for.</p> <p>1.2. Worrying culture in the highways agency. Anecdotal evidence from councillors and residents in the area shows a worrying culture of not wishing to object to new developments, displaying a shocking lack of concern for the issues in the area.</p> <p>1.3. Whilst it is appreciated that quantitative traffic surveys have or will be carried out, the current state of the road network around Mosley Common can be an extremely unpleasant experience. Journeys of only a few minutes from Mosley Common can take over an hour at various parts of the day currently.</p> <p>1.4. The matter raised at point 1.3 will be further worsened by the proposed site allocation of "Ecclestone Farm" which will add a further 700 houses in the local area, all of which will be likely to be served by J13 and J14 of the M60 and Leigh Road.</p> <p>1.5. The matters raised at point 1.3 and 1.4 will be further worsened by existing ongoing developments in the area as well as an additional 40 houses yet to be built at the Ecclestone Homes Garrett Hall site.</p> <p>1.6. Simply adding a left hand filter lane to the A580 will not improve the pre-existing traffic situation in the area. The traffic from Tyldesley, down Mosley Common Road, into Boothstown as well as other junctions of the A580 will continue to be a major issue.</p> <p>1.7. Speaking as a resident of the Mosley Common area, I can say that I am regularly impacted by the heavy traffic in the area, especially down Mosley Common Road, Mort Lane and down the A580. This traffic and negatively impacts my quality of life.</p>

1.8. By creating a new development which is not served by sustainable transport options. The Planning Policy Framework states that such options should be available. Merely adding extra roads is not a sustainable solution.

## 2. The use of Green Belt land over Brownfield sites

I propose that due to the high availability of brownfield sites, that allocating a large area of Green Belt land is not justified. Indeed I would state further that the test of "exceptional circumstances" which are required for removal of Green Belt land is not met.

2.1. Wigan Council published its most recent brownfield register in December 2020, which lists 1,100 brownfield sites available to accommodate over 8800 new homes. (Source <https://opendata.wigan.gov.uk/data>) Given the number of brownfield sites available, it is unnecessary to pursue a simplistic and reductive approach to allocating Green Belt land at this time.

2.2. Making use of brownfield sites would allow new homes to be spread throughout the area, reducing the need for infrastructure and amenities.

2.3. In the PfE documents it states that "exceptional circumstances" exist to remove Green Belt land. However, no justification is given as to why. In a recent PfE videoconference (held on 23/09/21) it was stated that "exceptional circumstances" and that in the absence of an official definition, that the current definition is a simplistic way to derive the definition, the simplicity of which only serves the purpose of removing Green Belt land. It constitutes "exceptional circumstances" as follows:

The most common factors used to establish "Exceptional circumstances" for removal of Green Belt land are:

not meet these:

Exceptional Circumstance factor: Unmet need for development.

This exceptional circumstance is not met because as illustrated by Wigan council's own brownfield register, sufficient brownfield sites exist to fulfil demand.

Exceptional Circumstance factor: The release is the most sustainable option.

This exceptional circumstance is not met because the area is NOT served well by existing transport infrastructure for its purpose. GPs surgeries are oversubscribed. Parents are unable to get their children to school due to bus capacity at peak times, resulting in many buses passing commuters by in the morning with empty seats as it is futile attempting to get the bus at normal commuting hours.

Exceptional Circumstance factor: Lack of contribution to green belt purposes.

This exceptional circumstance is not met because this land provides a natural boundary between the town and countryside, preserving an area of countryside for locals to use in order to exercise, ride bikes and enjoy the view.

Exceptional Circumstance factor: Creation of defensible boundaries

This exceptional circumstance is not met because whilst it is always possible to create a defensible boundary, this does not provide a good enough reason to remove this land from the green belt.

Exceptional Circumstance factor: Limited Visual Impact

This exceptional circumstance is not met because as discussed in UKSC 2018/0077, the current use of this land to be used for contiguous building of houses from Mort Lane all the way to the end of the road. Any new housing will consist of urban sprawl.

Exceptional Circumstance factor: Provision of Infrastructure

This exceptional circumstance is not met because as discussed, the current proposal does not provide for the current population of the area. The area is not well served by shops, leisure facilities and public transport. The proposed bus route to the guided bus way will not sufficiently mitigate this.

Exceptional Circumstance factor: Reuse of brownfield land

This exceptional circumstance is not met because Brownfield land within the green belt is available for reuse. As the above most common exceptional circumstances have not been met, this land should remain in the green belt.

## 3. The overwhelming focus on housing and not on amenities as part of the site allocation

The addition of 1100 homes to a small suburb constitutes the equivalent population of a village. The current community do not include extra shops, leisure facilities, a post office or a gym. There is a need for these facilities yet masterplans are supposed to address a number of factors and not just housing.

By proposing a large development of 1100 houses without sufficient amenities to support the population, the Planning Policy Framework states that new developments should have sufficient amenities to support the population.

This problem is further compounded by the fact that over 1000 houses are already in the area at varying stages of completion. This, including the PfE allocation will increase the population of the area.

4. The lack of revisiting housing demand close to urban centres following Covid-19
  - 4.1. The Manchester wide masterplan PfE needs to be a data and fact led initiative.
  - 4.2. The Covid-19 pandemic throughout 2019-2021 has materially changed the face published data commenting on the measurable increase in remote working positions
  - 4.3. The requirement to locate oneself next to an urban centre for knowledge worker forecasts at all in light of this huge global shift in ways of working.
  - 4.4. Places for Everyone should materially reconsider the amount of homes needed as new facts are available.
  - 4.5. The 2014 figures used to calculate the housing demand have frequently been cited without considering new facts.
5. The site allocation is anti-democratic, not supported by our elected members of Parliament
  - 5.1. The last general election took place in 2019. Residents of the Leigh constituency elect representatives to represent them for the duration until the next general election.
  - 5.2. James Grundy stands on a platform of "brownfield first" development and was elected MP for the constituency of Leigh.
  - 5.3. Similarly, the democratically elected MP for our neighbouring constituency of Wigan elects representatives to represent the neighbouring site allocations of JPA26 and JPA27.
  - 5.4. Despite us democratically electing these representatives for our constituencies, we have concerns about the way the local authority has conducted itself" in relation to the GMSF (now Places for Everyone) forward.
  - 5.5. This is not a party political issue, as James Grundy MP is a member of the Conservative Party and Labour party.
6. The level of consultation with local residents has been poor and not in line with Wigan Council's Statement of Community Involvement (SCI).

The "Places for everyone, Why are we consulting?" document (<https://placesforever.com/consultation>) states:

"The process of community involvement for Places for Everyone should be in general line with Wigan Council's Statement of Community Involvement (SCI)."

Wigan Council's Statement of Community Involvement (<https://www.wigan.gov.uk/Docs/PDF/Council/Strategies-Plans-and-Policies/Planning-and-Development/Statement%20of%20Community%20Involvement.pdf>) states:

"We will contact you... "The general public" "at the publication stage" "directly by email."

Yet Wigan Council has not contacted all local residents by post. Indeed the only direct communication has been from the local MP, informing us that he is not in support of the plan in its current form.

I would therefore like to propose that JPA35 be removed from the site allocation list until a meaningful community involvement to engage in a meaningful, detailed and collaborative way with local residents and their views have been achieved. Additionally:

  - 6.1. Residents of properties who directly overlook the proposed site allocation, or even those who do not (e.g. "retained farmsteads") have not been directly contacted about the proposed site allocation.
  - 6.2. A local residents group on Facebook shows repeated comments of "I had no idea this was being done through my door"
  - 6.3. By not engaging widely with local residents, many important viewpoints, facts and concerns have been missed.
  - 6.4. PfE and Wigan Council cannot ensure the soundness of their plan without a rigorous investigation into the geology of the site, especially with regard to the proposed site allocation. This has not occurred.
  - 6.5. Whilst I am sure the lack of engagement is merely an oversight, it does rather concern me.
7. The method of receiving comments via consultation is unusually and prohibitively costly.

In order to submit feedback about a local site allocation via the PfE website, a resident must first register on the website. This has the potential to prevent people adding their thoughts due to the lengthy process.

  - 7.1. There have been many comments from local residents that the lengthy process of registration actually prevented them from submitting their opinions.
8. The lack of a rigorous investigation into the geology of the site, especially with regard to the proposed site allocation.

As known by local historians, the site allocated for development was formerly part of a larger site with various locations across the site. Despite this:

8.1. There appears to have been no detailed investigation of the geology of the site beyond what has been seen on properties in the local area, such as Commons Road, where conditions are poor.

8.2. A freedom of information request was submitted to Wigan Council asking them for details of the site as part of the site allocation and how this could affect the nearby properties that exist. The council stated that they did not have any more details about this. As the flood storage is an integral part of the site allocation, but existing properties downstream, it is concerning that there are no details on this matter.

9. That the number of houses proposed as part of this site allocation would far exceed the demand for housing in the area.

9.1. Section 7.12 of the "Places For Everyone Joint Development Plan Document" states that the site allocation is to meet existing and current demand. With this in mind, it is difficult to follow the logic that has been used to remove land from the greenbelt have been met.

10. That site plans have ignored the houses located directly in the centre of the proposed site allocation.

10.1. Four houses exist in the middle of the proposed site allocation. These have been converted from farmsteads at all, in fact they have been conventional homes since they were converted into residential business whatsoever.

10.2. JPA35 states that the site allocation is ideal for "high density housing" yet the houses in the area are low density. It would be a planning folly to directly surround low density housing with high density housing. Historic buildings should be matching in size, style and density and the intent for this area is to preserve the character.

11. Summary

To sum up my points I believe that a significant oversight has been made in proposing the site allocation for development for the following reasons:

11.1. Traffic especially in view of existing ongoing development in the area and nearby roads.

11.2. Lack of proposed contribution to facilities by the new site allocation

11.3. "Places for Everyone" being unable to demonstrate that the exceptional circumstances exist for the site allocation.

11.4. That the number of houses being built exceeds the demand by PfE's own admission.

11.5. That sufficient brownfield sites exist to meet our demand

11.6. That PfE and Wigan Council have not invested enough diligence into their engagement with the community sync with their own guidance on this matter

11.7. That the process for submitting objections and feedback is unnecessarily and costly.

11.8. Incorrect or insufficient consideration of key features within the site allocation such as flood storage.

11.9. Lack of rigour around the important flood mitigation proposal which has only been described as "no details about" following a Freedom of Information request.

There are such glaring errors and oversights in the site allocation proposal that if JPA35 is approved a judicial review should be undertaken, which may have a high likelihood of overturning the decision.

I would implore you to listen to the experiences of the local residents. The traffic situation in the area with an extra 1100 homes to the area should have sufficient mitigation in place to address the concerns.

**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.**

I would like to request the following modifications:

- 1) That any greenbelt land in the site allocation of JPA35 be removed from the plan until the demand for housing has been proven to have been met
- 2) That any greenbelt land in the site allocation of JPA35 be removed from the plan until the demand for housing identified 8800 property availability in brownfield sites
- 3) That the plan should include mandatory improvements to the local road network, to be completed before and certainly before new houses start to be built. That these mandatory improvements be a condition of the plan.
- 4) That the decision regarding the site allocation of JPA35 be delayed until such a point as the council has demonstrated in their 'Statement of Community Involvement'
- 5) That properties to be developed within JPA35 around the existing homes in the middle of the site allocation (including farmsteads, despite being private homes occupied by professionals) are developed to match the character of the buildings already present.
- 6) That the site allocation should include appropriate facilities within the site such as a community centre to prevent the need to saturate nearby facilities. If you are going to introduce a small number of shops etc to establish a sense of community.

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- 7) That appropriate traffic calming proposals are made to avoid the new estate becoming a through route for heavy traffic.
- 8) That proposals are made to ensure that the existing pedestrian rights of way on the site are maintained, including the removal of tall garden fences, encouraging crime, littering, dog fouling and other anti-social behaviour, and that new pedestrian rights of way are provided for pedestrian rights of way passing through the site.
- 9) That, if the site is not removed from the plan in its entirety that the number of houses in the site allocation be reduced accordingly so that it matches the size of the allocations in the plan.
- 10) That a sufficient geological study should be conducted before agreeing the site allocation to ensure that floodwater on the site will not impact existing properties already within the site boundary, and that any areas of the site already known to flood are identified and protected.