



# BAMFORD GREEN BELT ACTION GROUP

## Places for Everyone Consultation 2021 - Regulation 19

### Response to Q 94 – JPA 19 Bamford/Norden

#### from Bamford Green Belt Action Group

Bamford Green Belt Action Group (BGBAG) have submitted two previous responses to GMSF consultations in 2016 and 2019. In both submissions we demonstrated that this site does not fully satisfy any of the GMSF/PfE objectives and fails 6 out of 7 of the site selection criteria. Despite our previous detailed responses, the site remains part of the PfE. We are pleased that the plan is at last being examined by independent inspectors and are grateful for the opportunity to present our reasons for requesting the removal of policy JPA-19 from the PfE.

Our response demonstrates that at all stages in the preparation of this plan, the GMCA have failed to protect green belt land, indeed in some instances have deliberately made decisions to ensure green belt land should be released from the protected status it currently enjoys.

### 1. PfE Growth and Spatial Strategies

In 2015 the GMCA ran a consultation on the strategies to underpin the Spatial Framework they were proposing, namely “growth” and “spatial” strategies. The growth strategy refers to the overall quantity of housing and employment space. The spatial strategy is concerned with the geographic distribution of development. This consultation was poorly publicised and as a result there were only 58 respondents of which only 6 were members of the public, and over 20 were developers and housing associations etc.

For housing, three Growth options were examined: match provision to baseline supply; meet the objectively assessed need (OAN); pursue a higher accelerated growth scenario.

After the consultation, GMCA chose a Preferred Growth option, based on meeting the objectively assessed needs (OAN). However, the growth projection used was 2.4% per annum. Compounded over 16 years, this would infer growth of 46% across the region. This appears to be unrealistically optimistic

Four spatial strategies were examined by the GMCA, at this stage, but after the 2016 consultation the spatial strategies were reviewed and 6 options were examined:

1. Business As Usual; - no green belt release, but this option did not meet required housing and employment land requirements.
2. Urban Max; - no green belt release, but would put undue pressure on city infrastructure
3. Transit City; - some green belt release; focus development round towns and transport hubs
4. Boost Northern Competitiveness; focus development in the North – could meet land needs, but disadvantages the South
5. Sustain Northern Competitiveness; Focus Development in the South – could meet land needs, but disadvantages the North

6. Hybrid Growth – This became the preferred option in the GMSF 2019. It is a combination of option 3,4 and 5 and involved release of green belt land to fulfil the requirement for employment and housing land. The option promoted:
- Significant growth in jobs and houses in the core city areas
  - Regenerating Inner areas – i.e. concentrating development near town centres
  - Boosting competitiveness of the Northern areas
  - Maintaining competitiveness of the Southern areas

Both Urban Max and Public Transport Max could deliver the growth required by the chosen growth strategy without green belt release, so the choice of the GMSF spatial strategy specifically meant that green belt release was inevitable. Therefore, the PfE plan must make the case for altering green belt boundaries to enable delivery of the OAN in spatial terms, as two other spatial strategies could have satisfied the growth plans without green belt release.

## Identify Housing Need and Land Supply

Having determined the growth and spatial strategies the GMCA looked to identify the land required for housing and jobs. The growth rate selected was 2.4% per annum which compounds to an overall growth rate of 46% over the 16 year period of the PfE plan.

In the 2016GMSF, the MHCLG 2014 statistics were used to calculate a housing need of 227k houses based on a forecast population growth of 295k people. Housing land supply was sufficient for 181k houses and so there was a deficit of land which led to the perceived justification of the release of green belt land to cover that unmet need. Sufficient green belt land to build 46k houses was designated for release to give a total land supply of 227k houses, equivalent to the identified need of 227k.

Three years later when the GMSF 2019 was put to consultation the population forecast and therefore housing need was lower, but the land supply had increased to the extent that for a population forecast increase of 250k the housing need was 201k and the land supply was 189k. There was therefore a supply deficit of only 11k houses. However, the GMSF introduced the need for a “buffer” to supply “flexibility and choice” to justify releasing green belt to build 29k houses i.e. 18k more than was necessary. This gives a total housing figure of 218k for a population of 250k.

By 2021, the PfE shows a forecast population increase of 158k, but a housing need of 165k and a land supply of 170k. Despite having sufficient land to build all the houses required, PfE still proposes to release enough green belt land to build 20k more houses giving a total land supply of 191k. With a forecast population growth of 158k this equates to 1.2 houses for every person. This is summarised in the table below and also shown in the submitted document “submitted evidence.pdf” as Table 1.

|   | <b>GMSF 2016</b>   | <b>GMSF2019</b>  | <b>PfE2021</b>  |
|---|--|--|---|
| Population growth:                                    | 294,800  | 250,000  | 158,194   |
| <b>(1) Minimum Required New Homes (ONS 2014)</b>      | <b>227,200</b>   | <b>200,980</b>   | <b>164,880</b>  |
| (2) Housing Land supply before green belt allocations | 181,437  | 189,283  | 170,409   |
| (2-1) Surplus or (deficit) of land supply             | (45,763)   | (11,697)   | <b>5,529</b>  |
| (3) Green Belt allocations released                   | 45,763   | 29,266   | 20,367  |
| <b>(2+3) Total housing land supply</b>                | <b>227,200</b>   | <b>218,549</b>   | <b>190,752</b>  |
|   | Unmet need, therefore, some justification for release of GB land | Unmet need, therefore, some justification for release of GB land | <b>There is a surplus of land and so NO justification for release of green belt</b> |

Therefore, as demonstrated above, there is no NEED for green belt land to be released for housing, it is obviously a WANT. It cannot possibly be sensible or logical to build more houses than the forecast population increase to the extent that there would be 1.2 houses per person. Average occupancy across Greater

Manchester is around 2.38 people per household. This would indicate a housing need of around 66,500 homes which can be more than adequately fulfilled with the existing housing land supply of 170,409 homes.

At a local level there is considerable confusion and disbelief over the projected housing requirements and number of houses proposed. This is discussed further in our analysis of Objective 1 - Meet our housing need:

## Site selection Process – Call for Sites

Having determined the growth and spatial options and the Housing Need, the GMCA undertook a Call for Sites and a site selection process to determine which sites satisfied their criteria for inclusion in the GMSF.

Both the GMSF and Places for Everyone (PfE) stated in Strategic Objective 2 “we will prioritise the use of brownfield land”, however, the site selection process used in the original GMSF (which is still valid for the PfE), fails to support this policy. Flawed procedures at several stages in the process have resulted in an excess of green belt sites being submitted over the preferred brownfield sites. Some of the problems in the site selection process were:

- Prior knowledge of green belt release - During the call for sites process it was widely known that green belt may be released. There was therefore a massive incentive for developers to utilise this “once in a generation” opportunity to monetise their stocks of green belt land, and no incentive to put forward brownfield sites. As brownfield sites are more difficult to develop and less profitable it will always be much easier to obtain planning permission for these sites in the future.
- Failure to properly identify green belt - As a result of the above, 999 sites were submitted of which 59% were greenfield a further 29.5% mixed greenfield / brownfield and only 11.5% PDL. It is difficult to identify the full amount of green belt (as opposed to green field) as, surprisingly, there wasn't a specific question on the site submission form to identify sites in green belt. It was left to the constraints section in the site submission for developers to identify the green belt and many deliberately chose not to make it clear how much green belt was included in the site.
- Preference for Large Sites - In accordance with NPPF para 73, the site selection process showed a preference for large sites over small sites. As brownfield sites tend to be smaller than greenfield there was an immediate bias in favour of greenfield sites, which directly contradicted the stated GMSF policy of preference for brownfield.
- Confined search areas - Finally, the search was confined to Broad Areas of Search, which meant any site which was not in these areas was excluded at an early stage – even though these sites may have been brownfield and the stated GMSF/PfE policy is a preference for brownfield first.
- Brownfield sites excluded - As a result, of the total number of PDL/mixed sites submitted, 249 available brownfield or mixed sites were excluded from the GM Allocations (see GMSF 1452769656892 and GMSF 1452773607228 in Rochdale alone). In total 1,738ha of available, non-green field land were excluded and could have been used to ease the pressure to develop green belt. If these sites were included up to 51% of the green belt could have been saved.

## 2. Site Selection Criteria

From the Growth and Spatial Options Paper para 5.8 (our emphasis)

*“Site selection was not, however, purely based on whether a site fell within an area of search or not. Instead, it was critical to consider the sites in the context of the overall spatial strategy. In order to achieve the principles established by the spatial strategy, it was considered appropriate to establish a number of “rules” when applying the site selection criteria to housing sites. These rules were:*

- *Each district was encouraged to meet their own LHN*

- **Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt.**
- *If a single district could not meet their own local housing need through their existing land supply there was an expectation that they would need to supplement their land supply through allocations beyond the urban area, to enable them to meet a significant proportion of their own LHN, considered to be at least 70% of its LHN*
- **No single district should exceed its LHN by more than 125%**
- *Collectively the northern Greater Manchester districts should meet around 100% of their collective LHN, in order to ensure that the overall objective of inclusive growth and boosting the competitiveness of north Greater Manchester would succeed*
- *The southern Greater Manchester districts should collectively meet a significant amount of their LHN, in order to achieve inclusive growth across Greater Manchester”*

The above extract indicates that there was some flexibility regarding housing and employment land requirements and the amount of green belt each borough could release. Any borough could choose to ask other areas to take some of their housing need if they wished, which is the main purpose of the spatial strategy. Some boroughs chose to protect their green belt (Bolton) whilst others chose to release large areas (Rochdale), but there was no NEED to release green belt, to some extent it was a choice. Whilst there may have been a need to release green belt in the GMSF2016, there is no need for Rochdale borough to release green belt land for PFE 2021.

Each borough assessed the sites they proposed to submit against 7 site selection criteria. Of these 7 criteria, numbers 1- 6 were designed to support the objectives of the plan, whilst criteria 7 was designed to deliver benefits to the local community.

Based on the GMSF Objectives and NPPF guidance, the Site Selection Topic Paper lists 7 criteria to identify potential development sites. The PFE states that JPA 19 does not fulfil 6 of the 7 criteria. In our opinion JPA 19 does not comply with any of the 7 site selection criteria and should be removed from the PFE.

The criteria for selection and our comments on the same are as follows:

- *Criterion 1 - Land which has been previously developed and/or land which is well served by public transport*

JPA 19 fails this criterion - The land is publicly accessible green belt and has never been developed. Neither is the site well served by Public Transport – see Assessment of Objective 6 below

- *Criterion 2 – Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors.*

Not Applicable - The site is not near any of these key assets

- *Criterion 3 – Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth*

No – the site is in a leafy suburb with very limited public transport or easy access to areas of employment. 96.61% of this site fails the Site Selection Good Accessibility test.

- *Criterion 4 – Land within 800 metres of a main town Centre boundary or 800m from the other town centres’ centroids*

No – the land is 2.4km from Heywood centre and 3.4km from Rochdale Town Centre

- *Criterion 5 – Land which would have a direct significant impact on delivering urban regeneration*

No – development would destroy green belt land.

- *Criterion 6 – Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits.*

No – Whilst some minor benefit may accrue through improved public transport there would be far greater harm to the community through loss of this land.

- *Criterion 7 – Land that would deliver significant local benefits by addressing a major local problem/issue*

JPA 19 is deemed by the PfE to fulfil this criterion.

BGBAG disagree with this assessment on the grounds that Criterion 7 is not a suitable basis to argue exceptional circumstances for release of green belt land, as discussed below. BGBAG and the local community are not aware of any “major local problems/issues” that would justify the inclusion of JPA 19.

## Criterion 7 and Exceptional Circumstances

(See evidence submitted “Criterion 7 – Our Case for Unexceptional Circumstances” by Matthew Broadbent)

Criterion 7 is described in full in the Site Selection Background Paper (03.04.01) p24-25:

*"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."*

JPA 19 will not deliver any benefits of numbers ii to vi above.

Regarding the first “benefit”, developing this site will not diversify the housing market as the area is already largely high-end housing to the extent that it is considered “aspirational” by the developer, Peel Holdings, and RMBC. Neither will the site contribute to the competitiveness of the North Manchester area

The only remaining “benefit” is that it will capitalise on existing high-end of market housing in the area. It is difficult to see why capitalising on high-end housing will bring any benefit to an area already full of high-end housing. In truth, developing this protected green belt land will bring considerable disadvantages to the area including:

- Loss of valuable green space for recreation, and mental and physical health and well being
- Destruction of ancient environments including centuries old hedgerows
- Destruction of wildlife habitats
- Increased traffic congestion
- Significant deterioration in the air quality near an AQMA
- Increased flooding from surface water and standing water
- Loss of green belt protection to the playing fields and sports facilities
- Loss of a carbon sink, so increased CO2 emissions
- Potential drainage problems due to inadequate drainage

- Overcrowded schools
- Overcrowded hospitals, doctors and dental surgeries
- Danger to health through building near power lines
- Risk of unsafe buildings on old mine workings

Given that this site does not fulfil any of the site selection criteria, we can only conclude that the inclusion of this site is developer led. In the Call for Sites Submission, Peel Holdings have been selective with the truth and there are several half-truths included in their brochure. Some extracts from the Peel Call For Sites Submission brochure (Winter 2015/2016) state:

*“the site performs a fairly limited Green Belt function.... The release of the site therefore would not result in any significant harm...” - “In conclusion, there are exceptional circumstances to justify the release of land from the Green Belt. Such releases are required urgently to deliver the new homes required and address the growing housing crisis. The release of this site will not result in significant conflict with the Green Belt purpose” “new landscape planting and green infrastructure will establish Jowkin Lane as a new defensible green belt boundary”.*

BGBAG do not understand how this new hedge will be more defensible than the existing, largely mature, ancient hedgerows all around the site which have “defended” the green belt boundary for well over 35 years.

Furthermore, the independent LUC green belt assessment carried out for GMSF2016 concluded that the site performed strongly against 3 out of 5 green belt criteria.

To use Criteria 7 as justification for exceptional circumstances as required by NPPF para 140 is stretching credibility to the extreme. The following extract from “Criterion 7 - Our Case for Unexceptional Circumstances” by Matthew Broadbent discusses this further:

*“Criterion 7 was designed to deliver benefits to the local community. These benefits include diverse housing mixes; including housing that is affordable and suitable for older people. The plan also proposes to offer exclusive high-end property under this criterion. While some of these aims are laudable, it is questionable that they constitute “exceptional circumstances” to take land out of the Green Belt in the case of sites that do not support any of the plan’s strategic objectives. Of the 18 allocations that satisfy Criterion 7, five do not satisfy any other Site Selection Criteria: JPA 9 (Walshaw); JPA 17 (Land South of Coal Pit Lane); **JPA 19 (Bamford/Norden)**; JPA 27 (East of Boothstown); and JPA 32 (South of Hyde).*

*Most of the “local” benefits outlined under Criterion 7 may be localized in their impact, but they are not localized in their characteristics. Housing provision that is affordable and suitable for older people can easily be offered via any sizeable development, including those sites allocated under the other six Site Selection Criteria. In fact, many of the allocations that support the strategic objectives of the plan do make this offering, so it is not necessary to allocate sites that do not support the strategic objectives, on this basis. It might be arguable that such allocations may mitigate some localized issues, but by virtue of its strategic decision to re-distribute housing need across the plan area PfE has made a conscious decision to not take such a parochial view of housing provision. Some of the other reasons advanced, such as good access to public transport, seem at odds with the plan’s own Site Selection Criteria.*

*We are of the opinion that most of the arguments advanced under Criterion 7 do not qualify as exceptional circumstances, in the instances where the site does not support the strategic objectives of the plan.”*

As noted in the earlier section “1. Growth and Spatial Strategies”, PfE should justify re-drawing the green belt from a spatial aspect and this case has not been made. There are no exceptional circumstances to redraw Green Belt boundary in respect of JPA19 as Rochdale Council have failed to examine all the alternatives including:

- Optimising the density of developments: Rochdale are not building to the recommended densities in the sites within 400m and 800m of current transport hubs and town/local centres (see submitted evidence Policy JP-H4.pdf by Matthew Broadbent)

- There is a significant 74 acre Brownfield site, the former Turner Brothers Asbestos Ltd (ex. Turner & Newall) at Healey which is desperately in need of remediation/regeneration.
- Other reasonable alternatives exist. Rochdale Council via Rochdale Development Agency give a list of potential housing projects not included in the PfE in their document Rochdale Growth Plan 2020-2030<sup>1</sup>. In addition to the 12,000 in the PfE there are 7,500 on largely brownfield sites in the Rail Development Corridor; 2,000 new units in 4 township centres and several others.
- Given there is no unmet need across GM or Rochdale, a reasonable alternative is to simply not build 450 homes on a protected green belt site that are not required to meet objectively assessed housing need.

### 3. Analysis of the PfE 10 Strategic Objectives with Reference to JPA 19 Bamford/Norden

Of the 10 strategic objectives laid down in the PfE, site JPA 19 does not fulfil 8 of them, a further 1 is not applicable and the site barely fulfils the final objective.

#### Objective 1 - Meet our housing need:

- i. *Increase net additional dwellings;*
- ii. *Increase the number of affordable homes;*
- iii. *Provide a diverse mix of housing*

To be able to meet the housing need, the housing requirement must be correctly determined. In Rochdale there is considerable public confusion as to the housing need. In summary:

- The ONS2014 calculation of Housing Need gives a figure of 8,048<sup>2</sup>
- The PfE shows 9,858<sup>3</sup>
- There is sufficient land available for 7,997<sup>4</sup> houses
- but Rochdale Council wish to release Green Belt land to build an extra 4,006<sup>5</sup> houses giving a total of 12,003.
- 12,003 additional houses equate to a buffer of 49% of the ONS 2014 local housing need of 8,048.

These figures are not justified, not positively prepared and not consistent with NPPF para 74 which allows for a buffer of up to 20%, but only where there is significant under delivery of housing over the previous three years. In the past three years Rochdale have **over delivered** their housing targets by 170%.

The Growth and Spatial Options Paper para 5.8 states:

*“Where a single district has sufficient existing land supply to meet its own LHN and where this would not impact on the overall objective of inclusive growth, it was not necessary to release Green Belt” and “No single district should exceed its LHN by more than 125%.*

As Rochdale have identified sufficient land to meet their housing need there can be no need to release green belt land.

Furthermore, there is no need for Rochdale to use the argument that they need to absorb unmet need in other boroughs as there is significant over supply in some boroughs, including Salford which has land available for over 15,000 more houses than it intends to build.

These figures are illogical and make no sense when compared to the objectives of the PfE. In addition:

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<sup>1</sup> [https://investinrochdale.co.uk/regeneration/downloads Rochdale Growth Plan p6](https://investinrochdale.co.uk/regeneration/downloads/Rochdale%20Growth%20Plan%20p6) Residential Development

<sup>2</sup> From 06.01.02 GM Structural Housing Market Assessment

<sup>3</sup> Table 7.2 p132 Main Plan

<sup>4</sup> Table 7.1 p129 Main Plan

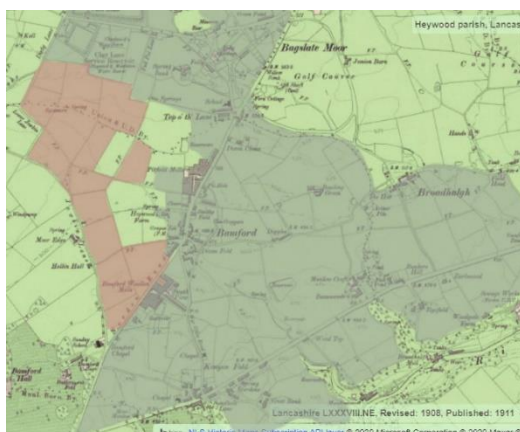
<sup>5</sup> Table 7.1 p 129 Main Plan

- No allowance has been made for windfall sites which will surely come forward over the next 16 years
- Empty homes in the town could be re-purposed
- Rochdale has a Rail Development Corridor plan which proposes 7,500 houses outside of the PfE
- Planning permission has already been granted for 1,000 houses on Greenbelt land.
- The Town Centre plan proposes 240 flats near transport hubs
- The brownfield sites are not being developed to the specified densities within 400m and 800m of a transport hub

Objective 1 point ii) mentions increasing the number of affordable homes. Whilst this is alluded to in several brochures from the Rochdale site developers there is no commitment to any target figure anywhere in the plan. Most allocations in Rochdale are designated for executive homes and there is a disconnect between the types of housing to be built and the low paid un-skilled jobs which will be generated in the largely industrial and warehousing developments proposed for the area. The Site viability assessment for JPA 19 shows houses with an average cost of £350,000 which will be well beyond the income of warehouse workers.

In Bamford specifically, there is no local need for yet more large houses:

- A survey in January 2019 (pre-pandemic) found that there were 88 houses for sale of which 27 (30%) had been on the market for over 6 months.
- A Sky News Line 18 investigation <sup>6</sup> (Sep 18) found that, of 5 types of housing crisis identified, Rochdale only had a problem with one - Rochdale was in the top 10% of boroughs in the country with the lowest demand for houses. Ranked 37 out of 390.
- Despite the developer mentioning affordable houses in the brochure there is no specific number specified anywhere and the Site Viability Assessment shows no affordable houses. Since 1960 over 130ha of land has been developed in Bamford, an increase of over 2,000 houses. There have been no improvements to infrastructure and a decline in the frequency of public transport in the same period. This is our last piece of publicly accessible, open green space. The picture shows green space and green belt lost since 1960, along with the additional loss proposed (in red) if JPA 19 were developed. (See Submitted evidence.pdf Diagram 1)



**BGBAG request that this allocation JPA 19 is removed from the PfE plan as this policy is not positively prepared, not justified and not consistent with NPPF chapter 2**

### Objective 2 - Create neighbourhoods of choice:

- *Prioritise the use of brownfield land;*
- *Focus new homes in the Core Growth Area and the town centres;*
- *Focus new homes within 800m of public transport hubs;*

<sup>6</sup> <https://news.sky.com/feature/line-18-is-there-a-housing-crisis-in-your-area-11479965>



- Ensure that there is no increase in the number of homes and premises at a high risk of flooding;
- Prioritise sustainable modes of transport to reduce the impact of vehicles on communities.

BGBAG wholeheartedly supports all the above objectives, however JPA 19 does not fulfill any of them. It is protected Green Belt land; it is not near the town centre which is 2.9 miles away; the nearest transport hub is 6km away; the site floods annually and the only public transport available are buses to Bury or Rochdale, there is only one bus each way to/from Manchester every day and there are no additional services planned in the transport plan.

The risk of severe flooding on this site is much higher than the flood risk assessment of 1 in every 30 years. A local resident has documented the flood risk in his personal response to the PfE which we reproduce here with his permission:

*"I live 100 or so meters north of the proposed development. Heavy rainfall the like of which I have never seen before have occurred in 2000, 2001, 2004, 2015 (When Rochdale council offices and the town were flooded out) more recently 16th March 2019 with Rochdale town centre again flooded , 27/28 July (4" rain on Rochdale over the 48 hour period), also 31st July and 1st August 2019 ( torrential rain here) 9th February 2020 (One of the most torrential rainstorms recently encountered flooding along Clay lane breaking through to Linnel Drive ), also 7/9/2019, 15/16th February 2020, 16/6/2020 (Asda in Mellor Street flooded) and so on. My calculations show that the northern area of the proposed site (approximately 40 acres) when built upon with non-absorbent buildings, roads, roofing, paving and so on, will result in a "flash off" of 1.5 million gallons or 6,300 tons of water assuming 35.4 mm of rain in 12 hours which was the amount that fell on Rochdale on Boxing Day in 2015. The topology of the site would bring about extensive flooding and damage. Simply because this site is currently grassland means that no one has given thought to just how much water is drained away by the fact that it is the local floodplain. Additionally, where will all this water then be taken? has the Local sewage and water system ever been upgraded? How will all this water be taken away and treated? My calculations show that a 2m diameter pipe as used for estate drainage would need to be some kilometres in length to accommodate rainfall of this magnitude. To prevent flooding, water must be taken away immediately. What work has been done on this? Just remember that this flooding issue is now and ever- present possibility, it must be planned for it will not just go away. It is not a question of if, it's a question of when. Any failure to consider and take appropriate steps to recognise this near future certainty and deal with it in relation to this site will in my view have exercised wilful neglect. The Ove and Arup Report makes it clear that the Council would be in breach of its statutory responsibility."*

Finally, Bamford is already a neighbourhood of choice and is considered "aspirational" by Rochdale Council. One of the main reasons it is considered a pleasant place to live is because there is an open aspect created by the green belt land, and, unlike many areas of green belt, there is ample public access to allow residents to benefit from the green space. Despite pictures in the Development Framework brochure (p38) showing access to the West side of Jowkin Lane, there is no access to this land anywhere. The only land with public footpaths is the land included in JPA 19 on the East side of Jowkin Lane.

**Allocation JPA 19 fails to meet any of criteria in Objective 2, therefore the plan is not positively prepared, not justified and not consistent with NPPF para 88 and should be removed**

### [Objective 3 – Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester](#)

- Ensure there is adequate development land to meet our employment needs; Prioritise the use of brownfield land;
- Ensure there is a diverse range of employment sites and premises; Facilitate the development of high value clusters in prime sectors such as:
  - Advanced manufacturing;
  - Business, financial and professional services;

- *Creative and digital;*
- *Health innovation;*
- *Logistics.*

Building on this site will have negligible contribution to the overall economy of Gtr Manchester. Smaller, brownfield sites can be developed by local builders which would contribute to the local economy. Large sites like this one will be developed by a national house builder which will make little contribution to the increased prosperity of the Northern areas of Gtr. Manchester.

#### *Objective 4 - Maximise the potential arising from our national and international assets.*

- *Focus development in the Core Growth Area, Manchester Airport and key economic locations;*
- *Improve visitor facilities in the City Centre, Quays and Manchester Airport and our international and national sporting assets;*
- *Enhance our cultural, heritage and educational assets;*
- *Improve sustainable transport and active travel access to these locations; Improve access for local people to jobs in these locations;*
- *Ensure infrastructure provision supports growth in these locations; Increase graduates staying in Greater Manchester.*

This site plays no part in achieving this objective.

#### *Objective 5 - Reduce inequalities and improve prosperity.*

- *Ensure people in all our neighbourhoods have access to skills training and employment opportunities;*
- *Prioritise development in well-connected locations;*
- *Deliver an inclusive and accessible transport network;*
- *Strengthen the competitiveness of north Greater Manchester;*
- *Reduce the number of our wards in the 10% most deprived nationally.*

Development on allocation JPA 19 will not allow access to skills and employment opportunities. It is not a well-connected location, it is 6km from the nearest train / Met stop and all the access by car will be off one main road (Norden Rd) which is already extremely busy in rush hour and leads to an Air Quality Management Area 300m from the Southern tip of the site.

To mitigate this, there is a proposal to make the bottom section of Norden Road a one-way system will result in all the traffic being diverted along War Office Road causing significant exacerbation to the existing congestion and pollution. A local traffic survey found that 900 cars currently use Norden Road at peak periods, an additional 450 executive houses will mean at least 400 more cars at peak periods especially given that the proposed houses are executive homes which are more likely to be occupied by people in managerial jobs not available locally.

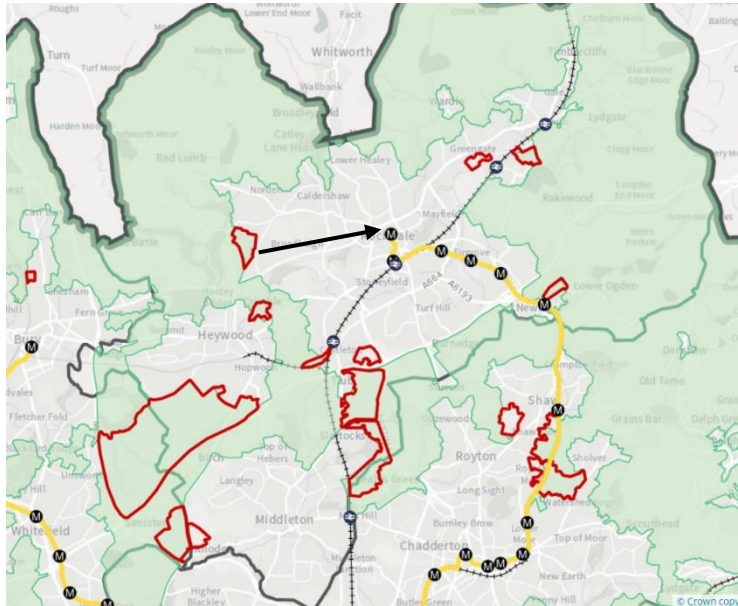
Bamford is not one of the 10% most deprived wards and building on the protected green belt there will not contribute in any way to a reduction in inequalities, or an improvement in prosperity. This site does not satisfy or contribute to achieving this objective.

#### *Objective 6 - Promote the sustainable movement of people, goods and information*

- *Enhance our existing transport network;*
- *Focus new development within 800m of sustainable transport hubs;*
- *Ensure new development is designed to encourage and enable active and sustainable travel;*
- *Expand our transport network to facilitate new areas of sustainable and inclusive growth;*

- Capitalise on national and regional investment in transport infrastructure
- ;Improve opportunities for sustainable freight;
- Ensure new development provides opportunities for affordable, high quality digital infrastructure.

There are no plans to enhance the existing transport network to this Allocation. There is an “aspiration” to extend the high-speed bus route to Heywood (30 minutes’ walk away), so any movement of people and goods will be by car or lorry which is contrary to all the sustainable aspirations of the PFE. (See “Submitted evidence.pdf Diagram 2)



This development is not within 800m of a transport hub, the nearest train / Metro stop is 6km away and would necessitate a bus or car journey to get there. Buses are only available to Rochdale or Bury; none to Heywood and only 1 bus each way to/from Manchester per day. Commuting to Manchester takes over an hour by car which is the only feasible option.

There are no firm plans to extend the Metro to within 800m of this site, or even to Heywood, but even if the Metro were extended to Heywood, it would take a 30-minute walk to get there.

Inevitably, due to the lack of available public transport, 450 new houses would mean at least 900 additional cars on an already congested road. Although we note with dismay that some of the assumptions in the Transport Topic Papers and Supporting documents seem alarmingly optimistic. In the Transport Locality Assessment Addendum – Rochdale (doc ref 09.01.24):

- Para 3.2.1 Table 1 admits there will be more journeys in 2040 compared to original estimates, but goes on to state there will be no impact from those journeys.
- Para 4.2.3 - Norden Rd to be made one way northbound but not War Office Rd. This will push more traffic onto War Office Rd, as it would normally split between the 2 roads depending on the direction being taken, currently at rush hour traffic regularly backs up to the junction of the two. This arrangement will cause gridlock into Bamford centre up to and beyond the pinch point at the end of Norford Way. Additionally, it will cause congestion for vehicles leaving the new development as they will all have to turn up Norden Rd and then double back into standing traffic if they want to access Bury Rd.
- Para 4.3.1 - Despite 450 “executive” homes (3-4 bedrooms) the model predicts only 155 additional departures at peak AM time and 166 additional arrivals at peak PM time. If we assume a car ownership of 2 per household that only equates to 17.22% AM, 18.44% PM. This appears to be a suspiciously low number, but even so it would add up to 1 kilometre of additional standing traffic AM and 1.1KM PM (based on average family car sizes).

- Para 4.3.4 - The prediction for the direction of travel for the additional vehicles shows the highest % traveling over Edenfield Rd (away from Rochdale) not down War Office Rd, the model shows 26% of traffic will head in that direction, that is over a quarter of the new traffic will leave Greater Manchester by the shortest route. The model predicts only 18% will discharge onto Bury Rd which seems very unlikely.
- Para 4.5.1 – Table 4 p20 shows traffic is expected to “disseminate” through the local road networks rather than pass directly onto the SRN (strategic road network). In other words these changes are expected to lead to “rat runs” through the local housing estates and join the main road at multiple points. However, before traffic reaches other main roads it will pass along War Office Road and in total 51% of the traffic is likely to pass along this one road, whilst 18% heading to Bury Road will “disseminate” through the local housing estates.

**JPA 19 does not satisfy Objective 6, it is not sustainable and therefore not positively prepared, it is not justified and is not consistent with NPPF paras 104, 105 and 107, therefore it should be removed from the PfE.**

*Objective 7 - Ensure that Greater Manchester is a more resilient and carbon neutral city-region.*

- *Promote carbon neutrality of new development by 2028;*
- *Promote sustainable patterns of development that minimise the need to travel and contribute to cleaner air;*
- *Locate and design development to reduce car dependency; Facilitate provision of infrastructure for cleaner vehicles;*
- *Improve energy efficiency and the generation of renewable and low carbon energy.*

Developing allocation JPA 19 will be directly contrary to this objective in so far as the green space currently acts as a carbon sink. Developing green spaces over brownfield sites in creases carbon emissions in two ways; firstly, the grassland acts as a carbon sink and absorbs CO<sub>2</sub> during photosynthesis and secondly, the additional houses will generate CO<sub>2</sub> both in the construction phase and then by the residents during occupancy. A recent article on the BBC news website<sup>7</sup> estimated that 51% of a building’s lifetime carbon emissions are produced during construction.

Steady State Manchester (SSM)<sup>8</sup> conducted research into carbon emissions as this information has been omitted from the PfE Integrated Assessments and is crucial to Objective 7 of the PfE. SSM looked in detail at the carbon consequences of the PfE. There are 3 aspects, namely: changes to carbon fluxes (emissions vs capture); carbon emissions from the new development; and carbon consequences of the new development e.g. due to increased economic / transport activity.

Using best estimates across the different land types, SSM calculated and estimated carbon sequestration by green spaces of 25.4Mtonnes CO<sub>2</sub> over the plan period.

Given the Greater Manchester carbon budget for 2018 – 2038 is 67 M tonnes, a loss of 25.4 M tonnes reduces the budget to around 42 M tonnes or around 38%. If the Green Belt allocations were released from the PfE there would be a saving of 17 M tonnes of CO<sub>2</sub>, equivalent to 25% of the GM carbon budget 2018 - 2038. According to Climate Emergency Manchester, the city has already used nearly 40% of it’s carbon budget for the next century in the last 3 years.<sup>9</sup>

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<sup>7</sup> <https://www.bbc.co.uk/news/science-environment-58667328>

<sup>8</sup> <https://steadystatemanchester.net/2021/09/16/and-then-there-were-9-places-for-everyone-comments/>

<sup>9</sup> <https://climateemergencymanchester.net/2021/09/03/manchesters-carbon-budget-blow-out-worsens-even-during-pandemic/>

Given that all the boroughs in Greater Manchester have declared a climate change emergency it seems illogical and contradictory to propose unnecessary building on green belt and green spaces. It is estimated that large, detached homes away from transport hubs produce 4 tonnes CO<sub>2</sub> per annum whilst urban homes near transport hubs produce 2 tonnes CO<sub>2</sub> per annum. As nearly all the green belt allocations are proposing larger family homes and very few are within 800m of a transport hub the result promotes a significant increase in carbon emissions and does not help transition to a low carbon economy.

As discussed in Objective 6, given the distances to public transport and the nature of the houses to be built, the only realistic method of transport on this site will be by car and so there will be increased CO<sub>2</sub> from around 900 extra cars in addition to the increased CO<sub>2</sub> from the occupants of 450 houses.

The access to this site will be on to Norden Road, already congested at peak times with 900 cars/ hour and leading directly to an Air Quality Management Zone (AQMA) 300m from the southern tip of the site. The AQMA is at a major junction directly opposite a primary school where young children walk to school each day breathing the polluted air. The PFE proposal to make a section of Norden Road one way does nothing to reduce the total amount of pollution emitted, it just spreads it further afield and may well mean that War Office Road which will now be used by all cars trying to get to Bury Road will suffer increased pollution.

**JPA 19 does not comply with Objective 7, developing the site will cause an increase in pollution in the area; it will lead to the loss of a carbon sink and directly increase the carbon emissions in the area. Therefore, it is not positively prepared, and not consistent with National Policy and does not comply with NPPF para 105 and should be removed from the PFE.**

#### *Objective 8 - Improve the quality of our natural environment and access to green spaces.*

- *Enhance special landscapes, green infrastructure, biodiversity and geodiversity;*
- *Improve access to the natural environment and green spaces including parks;*
- *Promote the role of green space in climate resilience and reducing flood risk.*

Self-evidently, building on green spaces only serves to restrict access to them, not improve access. The land is grade 3 agricultural farmland in active use for grazing and grass crops and the majority landowner does not wish to sell.

This is the last publicly accessible piece of green space in Bamford it is an open area and because of this provides a safe space for hundreds of people every week to exercise, walk dogs, cycle and socialize. On a wet week in February 2019, 500 people, 146 dogs and 30 horses used these fields. During the recent lockdowns in the week ended 6<sup>th</sup> March 2021 that figure escalated to over 2,000 walkers, 179 cyclists and 49 horse riders. It is a much used and well-loved open green space, easily accessed without resorting to cars. NHS England stated that the Covid pandemic has highlighted the importance of being outdoors to people's mental health and physical health. Building over this land will not improve access to green spaces and will have a detrimental effect on both physical and mental health and well-being of residents.

The nearest alternative public green space is Queen's Park in Heywood, 1.5km away. In reality this is a car journey away as small children are unlikely to walk a 3km round trip to get to the nearest play area, and there is no alternative public transport for those without cars.

The site is an important area near Ashworth Valley and forms a valuable green space for many varieties of flora and fauna including pipistrelle bats, deer, lapwings, badgers, newts, voles, shrews, dormice, hedgehogs and many others. Development will destroy many of the natural habitats and ancient woodlands. The site is criss-crossed with ancient hedgerows over 100 years old and contains mature trees which would be demolished by developers. The site has significant environmental and amenity value and its loss will deprive future generations and severely diminish the natural environment.

The football pitches on the site are home to Bridge Football Club, where over 600 juniors / week play; along with Fieldhouse Cricket Club and Rochdale Racquets Tennis Club, both of which are in constant use during the seasons. Whilst the land that they occupy is not at present allocated for development, these fields and facilities will lose their current green belt protection which puts them at increased risk of development in the

future. This is evidenced by the fact that GMSF2016 wanted to knock down the tennis, cricket and football clubs and build 300 homes in their place.

This allocation does not comply with Objective 8. It is not consistent with NPPF para 99 which states that:

*“99. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:*

- *a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”*

**JPA-19 Fails to comply with Objective 8, it is not justified and not consistent with NPPF para 99 and NPPF chapter 15 and should be removed from the PFE.**

#### Objective 9 - Ensure access to physical and social infrastructure

- *Ensure that our communities and businesses are supported by infrastructure;*
- *Improve the capacity and network coverage of digital, energy, telecoms, transport and water in key growth locations;*
- *Ensure new development is properly served by physical and social infrastructure including schools, health, social care, sports and recreation facilities.*

As previously described (Objective 1) the physical infrastructure in Bamford has not been improved in over 60 years. With the sole exception of one primary school in the early 1960's (which is now full to capacity), the infrastructure has remained the same since 1960. Meanwhile over 2,000 additional houses have been built on 130ha of green space in this small area.

Furthermore:

- The site is poorly served by public transport (see Objective 6)
- Has an antiquated drainage and sewerage system which has not been upgraded in over 50 years. The drainage is inadequate for the present level of occupation and will not be able to cope with additional domestic drainage as well as increased surface water run off due to the loss of the natural soakaway provided by the green belt land.
- Both local primary schools are full to capacity. The nearest secondary school is 2.25km away – a 40 minute walk. Without additional educational facilities in the locality there is likely to be no alternative but for children to travel out of the locality for education.

**JPA 19 does not comply with Objective 9. The plan is not effective, not positively prepared and not consistent with NPPF para 95 and should be removed from the PFE.**

#### Objective 10 - Promote the health and wellbeing of communities.

- *Ensure new development is properly served by health care services that meet the needs of communities;*
- *Improve access to healthy food options for all communities;*
- *Reduce the health impacts of air pollution through accessibility of sustainable travel such as public transport, cycling and walking;*
- *Maximise the health benefits of access to the natural environment and green spaces;*
- *Coordinate with and support the delivery of local and Greater Manchester wide health strategies.*



Once again, building over our green space does not improve access, it destroys it. Despite promises to retain footpaths there is no comparison between walking on a footpath in an open field and one between two buildings. The former is uplifting, the latter often depressing.

As discussed in Objective 6, there are no obvious plans to mitigate the effects of additional air pollution caused by additional cars on the road. This site is not sustainable and the only attempt to mitigate pollution is the installation of EV charging points.

Healthcare provision has not been addressed, there are no doctors' surgeries in Bamford. The nearest is 2.25km away and currently works at a doctor: patient ratio of 1:2000 which is 2.5 times the national average of 1:800.

We can see no evidence of planned expansion to, or additional, new local hospitals. Across Rochdale the planned 12,000 additional houses will (at average occupancy rate of 2.2) bring an additional 26,400 residents into the Borough. It is vital that these residents have adequate access to health care and education as stated in NPPF para 96.

The site contains 7 electricity pylons carrying 2 separate lines. One is 135ghz, the other 270ghz. International studies have shown that children living within 50metres of the power lines (not just the pylons) are at an increased risk of leukemia and whilst easement can be provided for these this could well impact on the developable area of the site and its associated viability. Impacts on health and safety from power lines and the impact on build heights etc. will also need to be addressed.

**JPA 19 fails to comply with Objective 10, it is not justified or consistent with NPPF chapter 8 and particularly NPPF para 96 and should be removed from the PFE.**

## Missing Objective

BGBAG are surprised to note that there are no objectives or strategies included in the PFE to specifically protect and promote both the green belt / green spaces and the rural economy.

Para 1.51 of the Plan states that 115,084 ha, or 46.7% of Gtr Manchester is designated green belt. This is half the land mass of the area which supports rural businesses, farms, liveries, recreation and leisure activities and the wider rural economy.

Rochdale MBC have put forward 21% of their grade 3 agricultural land to be included in the PFE as suitable for development. However, there is no mention of any policy for growth or protection of the rural economy. Once this land is gone it can never be replaced and future generations will be deprived of the pleasure these lands have provided to our generation and generations before us. For some, the opportunity to make a living from the land will be denied them as a result of this illogical and reckless drive for economic and housing growth at all costs. GM describes itself as a City-Region and as such excludes all those people who live and work in the rural areas. The GMCA have a duty to promote policies which support all their residents, not just the urban ones.

## Barriers to 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. The land was submitted by Peel Holdings in response to the call for sites without the land-owners knowledge or permission. Similarly, a home on the site was also included without the owners' knowledge or permission. Since the site was submitted, the main landowner has been subjected to constant requests to sell to developers. This farm has been in the family for three generations and they do not wish to sell, they wish to pass the land on to the next generation.
- 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 infra- structure has not been adequately addressed and extensive infrastructure improvement is likely.

## 4. Modification

Of the 10 strategic objectives in the plan, JPA 19 fails to support numbers 2,3, 6,7, 8,9 and 10, Objectives 4 and 5 are not applicable to this site. Worryingly, JPA 19 does not even contribute to the fundamental of Objective 1 – “meet our housing need”, because there is no actual unmet need. In addition, it is likely to prove difficult and expensive to deliver.

Contrary to the PfE Plan assessment, BGBAG are of the opinion that the site also fails to fulfil all the 7 Site Selection Criteria and therefore there are no spatial or local exceptional circumstances to justify redrawing the green belt boundary.

### **Modifications requested:**

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

**BGBAG request that Criterion 7 is deleted from the list of Site Selection Criteria along with all 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.**

## 5. The PfE is Not Legally Compliant

### 1. Duty to Co-operate

As part of the planning process there is a statutory duty to co-operate with other neighbouring boroughs. The Statement of Common Ground of August 2021 states that Stockport had not yet quantified whether their unmet need. The Growth and Spatial Options Paper also notes that there could have been an option to propose to meet some of Stockport’s need in the PfE Plan. It goes on to note that Stockport has not yet established whether it will have any unmet need.

It now appears highly likely that Stockport will have a shortfall of 7,484 dwellings which could have been met across the other boroughs in the GMSF. Unfortunately, the GMSF/PfE has proceeded to Regulation 19 consultation before Stockport have undertaken their Regulation 18 consultation. Stockport asked in March 2021 if the other 9 boroughs would be willing to accommodate some of their surplus housing need, but this opportunity has not been adequately explored and therefore the Duty to Co-operate has not been fulfilled.

### **Modification required:**

**This Regulation 19 consultation should cease until the 9 boroughs of the PfE have ascertained if they are able to accommodate Stockport’s housing need.**

### 2. Consultation should not proceed to Regulation 19

There are concerns that the PfE should not proceed to Regulation 19 consultation as the PfE will have substantially different effects to the GMSF for several reasons:



- As a result of Stockport leaving the GMSF there were significant changes made to convert the GMSF into PfE, one of these was to appoint a new committee. This is effectively a change in the overseeing body.
- Many of the supporting documents were updated because of Stockport leaving.
- Government changes to the calculation of housing needs have led to an increase of 35% in the Manchester City housing need.
- The long-term effects of the recent Covid pandemic and Brexit have not been accounted for in any way. PfE state “it is recognised that the country is still in a state of flux” yet conclude that the plan will not be affected.

**Modification required:**

**Places for Everyone should undergo a Regulation 18 consultation before proceeding to Regulation 19. This examination should not go ahead.**

### 3. Statement of Community Involvement

BGBAG are concerned that the Statement of Community Involvement in Rochdale borough is flawed and has not complied with regulations as many residents were excluded from participating in the consultation.

On 5th August 2021 RMBC adopted a new Statement of Community Involvement 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.

The impact of these changes includes the fact that RMBC have 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 four libraries that were open. There were no workshops or drop-in sessions. Anyone who does not have access to the internet at home is only able to see one of the many documents by going to a public library between 9.30 and 4.30 Monday to Friday (i.e. during normal working hours) and sitting down to read through the 123,350 words over 468 pages. None of the more than 90 supporting reports were provided for scrutiny. This effectively excludes several vulnerable groups from the consultation, particularly the elderly and the poorer members of society who would find it impossible to participate using just a mobile phone, even if they could afford to pay for the data allowance it would need to access the portal, download the documents and write a response. Local councillors have received numerous requests for help from bewildered pensioners who have no access to any information but who are keen to review the Plans and to participate in the consultation.

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**

## 6. Submission

This report is submitted on behalf of the committee and over 1,000 supporters of

### **Bamford Green Belt Action Group (BGBAG)**

*(Submission of this document was approved by the committee in their meeting held on 31<sup>st</sup> August 2021)*

32 local residents felt unable to respond personally to the consultation for various reasons including: the complexity of the issues; lack of access to the documents and insufficient time to read the information provided. They have requested that we add their names as supporters of this response:

All of the listed supporters are 13 years old or over

NOTE: The names and addresses have been submitted to the PfE consultation portal, but deleted from this document for privacy reasons.