



Dear Members of the Examination Panel,

I would like to set out my objections to JPA1.1 and JPA2 covering the Slattocks and Pilsworth areas of my Heywood & Middleton Constituency.

I have consulted with local residents and received a noticeably high volume of objections from constituents in the affected area and feel it is only right that I join them in expressing my own profound concerns about the proposed allocations under the scheme.

PfE (and GMSF before it) has a number of important strategic policies that would undoubtedly benefit local residents and communities, but the plan has always been flawed by its relentless assault on protected green belt sites.

This assault coupled with a total disregard for local community feedback has delayed the plan for many years, thus communities have lost out on the many positives in the PfE.

Following the withdrawal of Stockport from the GMSF and Bolton's subsequent removal of green belt allocation, 8 councils still considering the use of green belt. However, with recent reports that Bury and Oldham may also reviewing their positions on green belt, this could be as few as 6 authorities still considering green belt allocation. On that basis, I would submit that PfE can hardly be said to be a plan supported by the 10 GM councils, nor its proposed allocations be considered a part of a comprehensive and coherent strategy for the wider conurbation.

The housing allocations on green belt have always been the main obstacle to the plan evidenced by the 10s of thousands of local objections to GMSF/PfE housing green belt allocations. A great many originating from my own area.

However, GMCA continue to push building houses that are not required on green belt sites. I would suggest this is a cynical attempt to get PfE over the line before NPPF legislation changes.

Anyone who has followed the progress of this plan will know the housing numbers have been reverse engineered from day one in an attempt to justify building on green belt sites, no more so than in Rochdale Borough. The Council has always had a stated aim to boost its council tax base and evidently sees PfE as an ideal vehicle for this.

The plan started with the GMCA choosing a spatial option which required green belt release. Given this was widely known the call for sites was inundated with protected green belt sites, many not even owned by the submitters. GMSF then attempted to justify building on these preferred sites by stretching the plan out as long as possible and using excessive buffers to boost the apparent housing need.

As the Government have now confirmed the housing need targets are advisory (which councils should have known all along), it's time to objectively assess what housing is actually required for each borough on an evidenced base.



Basing the local housing need (LHN) on 2014 figures which are now 8 years out of date gives the maximum LHN. Subsequently the ONS 2016, ONS 2018 and the 2021 census stats have all produced significantly lower LHN figures.

It has been my own experience when discussing Rochdale Borough's housing needs, there is little interest in actual local need, which would highlight a need for smaller, lower cost dwellings centred on employment and transport links, but rather to push ahead with developments which will boost Council Tax yield in the borough.

During my first meeting with the then leader of RBC, Allan Brett, he advised me he was in favour of building "as many Unaffordable homes as possible."

I know this is not an isolated incident as I was subsequently advised by a local green belt he had told them "Rochdale is green belt rich, cash poor, so the council has to monetise the green belt."

Similarly, senior officers and lead members have been open with residents about the intent to build on green belt sites, with one stating that "those sites [allocations at Bamford and Littleborough] will be built on come hell or high water" in August 2021.

These statements are frankly astonishing, but they tell you all you need to know about Rochdale council's objectives. They have not come to this process as an honest broker, but rather with a specific agenda.

Furthermore, the numbers simply don't stack up. Even if one were to use the Government target of about 8,000 dwellings, Rochdale has a land supply before the PfE green belt allocations of about 8,000 – so the green belt allocations are simply not required under current NPPF guidelines and certainly not under the proposed new NPPF guidelines.

The 122.5% uplift used by GMCA to try and justify green belt release in Rochdale has no evidence base behind it and is completely spurious. This will do nothing to address the local affordable housing crisis and in fact by attempting to divert resources away from affordable housing, would actually make the situation worse and set a dangerous precedent.

Residents have never once said they want to see more executive houses built on protected green belt, quite the opposite.

Turning specifically to the sites under examination today, I would note that 100% of the allocation is Green Belt – however, no exceptional circumstances have been demonstrated as would be required by the NPPF. GMCA's Brownfield Preference Policy is not being followed by allocating Green Belt in this instance.

I would also contend that the size of proposed housing development will overshadow the current community and is not consistent with GMCA statements about "*existing settlements and pockets of housing*."

I would also offer that due to the dated nature of the date being used for calculations, the true need in the area is now grossly overstated. ONS & 2021 Census data shows



that the population is not growing as fast as expected with household formation at just 50% of the previously predicted rate.

Notwithstanding this, Local Housing Need (LHN) figures for Rochdale Borough show that RBC overbuilt by 170% in the period 2018-2020.

In order to justify this, RBC are conflating several schemes (e.g., Atom Valley; Rochdale Rail Corridor; PfE) and using them all as the basis to build on Green Belt.

I would also contest the economic benefits in terms of employment and skills to the area.

Rochdale Development Agency says Rochdale is a good place for businesses as labour costs are 16% lower than GM average and 24% lower than national average. Surely the Agency should be seeking to attract skilled and high-paid jobs to the area rather than compounding the low expectations and low wages we currently endure. It strongly suggests that the employment benefits as touted are a figleaf for further residential development. It certainly does not meet the aspiration for *“high quality, adaptable, employment floorspace within a ‘green’ employment park setting.”*

There have been vague and unquantified suggestions of further infrastructure in the area, but no specifics, costings or timescales for these and RBC routinely uses the promise of rail link, which is not popular locally, as an inducement to support building. From my recent dealings with both planning and TfGM, I am aware this is far from a firm commitment in any measure and the business case is still being worked out and the time necessary to implement any scheme would prevent local people from feeling the benefit for some time after the new development had been completed.

Finally, I would encourage the panel to have regard to the environmental impact in the area.

Undoubtably, the loss of green land and addition of potentially hundreds of vehicles to the roads in the area will have a significant impact on air quality. There will also be the loss of agricultural land, which whilst I concede is not ‘top grade’ could still be put to better use in our national drive towards food security, which has been brought in to sharp relief by recent international events.

In conclusion it is difficult to see how either JPA1.1 or JPA2 could be any less appropriate for inclusion in PfE or a local plan:-

- The sites are not justified or needed based on housing need numbers for Rochdale
- The sites are contrary to existing housing policy per current NPPF and protected green belt
- The sites fail to adhere to the brownfield first approach and encourages developers to cherry pick protected green belt sites
- The sites fail to meet multiple GMCA selection criteria



- The sites will place further unimaginable pressure on local doctors, dentists, schools – all currently stretched to the limit with zero capacity and for which there has been no detailed plan for augmentation submitted
- The sites fail to address the real local issue of affordable housing
- The sites will rob local residents of green recreational space which will inevitably have an adverse knock on effect to local services and environment
- The sites' objective has never been supported by local residents
- The sites are completely at odds with the climate emergency declared by the local council
- The sites will result in the loss of farmland
- Given the recent moves in interest rates the sites are likely to not be viable for a significant number of years so feasible could potentially be land banked

I would be most grateful if you could take the above points into consideration when reaching your final conclusions – to allow this to proceed would be a devastating hammer-blow to the local community, the environment and the future of the area.

Yours Sincerely

Chris Clarkson MP

*Member of Parliament for Heywood & Middleton*