

Family Name	Akhtar
Given Name	Nadia
Person ID	1287499
Title	Stakeholder Submission
Type	Web
Family Name	Akhtar
Given Name	Nadia
Person ID	1287499
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>There are a range of reasons, however, the most key reason is the fact that this allocation should be removed from PfE as the site is publicly accessible green belt land, which is protected by national planning policy. There should be no two ways about it. This is beautiful, pristine, green countryside which is enjoyed by all who live nearby.</p> <p>In addition:-</p> <p>Traffic:</p> <ul style="list-style-type: none"> -This area cannot cope with increased traffic levels. We have just one main road running through Bamford and the addition of new housing estates will make this untenable for existing (and new) residents. -The site is not accessible to either the Metro or local train stations therefore everyone will use cars which is not sustainable. This is already a problem now, the additional of hundreds or thousands more homes will only make this issue worse. -Congestion in the area will naturally increase if this proposal goes ahead. More idling, running engines and cars sat in traffic will make transport untenable. -In the absence of any real transport links in the vicinity, residents are reliant on cars. This should not be encouraged and the creation of potentially thousands or even hundreds of new homes would only exacerbate a global problem we must nationally overcome. -There is an air quality management zone within 150m of the site which will become significantly worse if this site is developed. Traffic in the locality has already increased in recent years, specifically following the Clay Lane development many years back when assurances were given that traffic would not be affected. This turned out to be false.

-The allocation does not promote sustainable transport and will significantly increase single use car journeys and CO2 emissions.

-The existing roads will not accommodate the extra traffic of 900 additional cars and the traffic assessments are unbelievably optimistic.

-Making Norden Road one-way will force all the traffic down one road which will make the air quality significantly worse. I live on a cul-de-sac off Norden Road. I strongly oppose this proposal which will increase traffic journeys, delays and queues, not to mention that it will worsen air pollution.

-The site fails to comply with PfE Objective 7 and is not consistent with adapting to climate change, moving to a low carbon economy and NPPF Chapters 2 (para 8) and 9.

-The site is not justified and not consistent with national policy.

Green belt:

-Green belt areas should NOT be built on. Indeed, that was the purpose of their creation. There are other, far more suitable areas than Bamford/Norden which do not involve the desecration of wildlife habitats, areas of natural beauty and woodland. I grew up enjoying the green belt beauty offered around Bamford, Norden and Ashworth Valley. If this plan were to proceed, the area would be ruined for future generations. Such destruction cannot be justified.

-There is no unmet housing need across Rochdale to justify building on this site which is protected green belt land.

-Developers have to prove exceptional circumstances to build on green belt land by demonstrating they have examined all other reasonable options. There are many other viable options which do not include green belt sites such as Bamford/Norden.

-Many brownfield sites are not included and many more will become available as we come out of the pandemic, these should be used in priority to protected green belt.

-Densities on existing brownfield sites should be increased.

-Therefore, other reasonable options exist and there are no exceptional circumstances to justify building 450 executive detached houses on protected green belt land.

-The site fails to comply with PfE Objectives 7 and 8 and is not consistent with sustainable development and NPPF Chapter 13.

-The site is not justified and not consistent with national policy.

Nature and wildlife:

-Ashworth Valley is a area near the site which provides leisure opportunities for local resident families, including children and which provides a beautiful greenbelt area for people to enjoy, something which was increased in value in recent times and is considered a direct antidote to mental health problems.

-Ashworth Valley supports a vast array of animal and bird species, including protected ones such as newts, voles, shrews, bats, badgers, dormice, deer and hedgehogs. It is also a wonderful forested area with a stream and waterfalls. As a nature lover, I find the idea of the natural habitat of so much wildlife being needlessly, potentially destroyed, both irresponsible and unconscionable.

-This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment.

-The site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapter 15.

-The site is not justified and not consistent with national policy.

Flooding:

-The assessment of the flood risk for the site is far removed from reality. In fact the site has some degree of flooding every year, sometimes severe. My neighbour at the bottom of the lane suffers regular flooding from Norden Road, including sewage waste which ends up in his garage during periods of heavy rain and localised flooding. This is a serious issue and the risk will increase with the creation of new homes in the locality. The risk is real and will only worsen through the increase of resident homes in the locality.

-The site is heavy clay and has natural springs running through it as indicated by adjacent road names "Clay Lane" and "The Springs".

-Building on protected green belt land means concreting over open fields and removing hedgerows and mature trees that will soak away the flood waters and therefore will pose a significant flood risk. These are also areas of natural beauty and a natural haven for all manner of wildlife which should not be overlooked.

-The site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter 14.

-The site is not justified, not deliverable not consistent with national policy.

Schools:

-This area already suffers a shortfall of schools.

-It is critical that there is a sufficient choice of school places available to meet the local needs.

-There is no proposal for additional schools on this site and existing schools are already full.

The site fails to comply with PfE Objective 9 and is not consistent with NPPF chapter -8 (para 95).

-The site is not justified and not consistent with national policy.

Leisure:

-Locals have come to cherish this green area which forms part of the proposed site and which provides a haven for families and has exponentially increased in use since the start of the pandemic. Prior to this it also retained huge popularity with walkers and walking groups. During the current global obesity crisis, leisure activities and the availability of good locations for exercise and leisure should be promoted rather than being withdrawn and built on.

-This site is an important local amenity housing Football, Cricket and Tennis clubs and the site is well used, publicly accessible green belt land.

-Removing green belt protection from the Football, Cricket and Tennis clubs"significant increases the likelihood these sites will be developed in the future.

-In March 2021 over 2,000 walkers, children, cyclists and riders used the pathways in one week. Destroying this land by building unnecessary unaffordable homes over it is against sustainable development and local social needs.

-The site fails to comply with PfE Objectives 7, 8 and 10 and is not consistent with Chapter 8 of NPPF.

-The site is not justified and not consistent with national policy.

Local housing need:

- Bamford/Norden is already a densely built up area. The existing green belt provides a delightful respite from the suburban nature of the locality, It should not be built on.

-Rochdale MBC have a Local Housing Need of 8,048 and land available for 7,997 houses. Therefore, RMBC have no unmet housing need to justify

building an additional 4,006 houses on green belt / green field land across the borough.

-There is no acute shortage of large detached executive homes in Rochdale. Only a shortage of affordable housing.

-The site's inclusion means it will be built on in priority to brownfield sites due to its higher profitability.

-PfE is not positively prepared as it is not consistent with achieving sustainable development.

-The site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter 2.

-The site is not positively prepared, not justified and not consistent with national policy

Climate change:

-In the absence of any real transport links in the vicinity, residents are reliant on cars. This should not be encouraged and the creation of potentially thousands or even hundreds of new homes would only exacerbate a global problem we must nationally overcome.

-Rochdale Council declared a Climate Emergency in July 2019. Building large executive homes on protected green belt land is inefficient in terms of carbon usage and emissions from vehicles.

-Large, detached homes away from transport hubs produce circa 4 tCO₂/year vs urban homes near public transport which produce circa 2 tCO₂/year.

-This site does not support a transition to a low carbon future and instead promotes a significant increase in vehicle emissions.

-This site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapters 2, 9 and 14.

-The site is not justified and not consistent with national policy.

Pylons:

- We do not need any more unsightly pylons in the area. These take up space and pose potential health risks to residents.

-The site has two separate lines of pylons which international studies have proved can be a cause of Leukaemia to children living within 50m of the lines.

-The site fails to comply with PfE Objective 10 and is not consistent with NPPF Chapter 8.

-The site is not justified and not consistent with national policy.

Building density:

-Rochdale MBC have not planned to build all their housing sites at the correct specified densities in the NPPF, therefore they are not making use of effective land.

-The sites within 400 and 800m of transport hubs could accommodate up to 500 more houses which would protect green belt sites.

-This site is one of the lowest densities in PfE and the 450 homes could easily be accommodated by increasing densities on brownfield sites closer to existing infrastructure.

-There are clearly other options available, other brownfield sites and densities should be increased on sites closer to local rail/Metrolink services.

-The site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapters 2, 11 and 13.

-The site is not justified and not consistent with national policy.

<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>The modification I seek is for JPA 19 Bamford/Norden to be removed from the PfE.</p>
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