

Family Name	Barber
Given Name	Jacqueline
Person ID	1287613
Title	Stakeholder Submission
Type	Web
Family Name	Barber
Given Name	Jacqueline
Person ID	1287613
Title	JPA 22: Land North of Smithy Bridge
Type	Web
Soundness - Positively prepared?	Unsound
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>It is unsound on several points:-</p> <ol style="list-style-type: none"> 1. Greenbelt -The site fails to comply with PfE Objectives 7 and 8, only meets one of 7 Site Selection Criteria and is not consistent with sustainable development and NPPF Chapter 13. The national planning policy framework states greenbelt should prevent neighbouring towns merging into one another (Smithybridge and Littleborough will be merged); it should assist in safeguarding the countryside from encroachment (housing will extend to the very edge of Hollingworth Lake, a country park attracting many visitors, and the necessity to provide an alternative for the car park which will be lost will mean that even more greenbelt land will be lost further round the Lake perimeter); it should preserve the setting and special character of historic towns (walkers on the surrounding hills will see an urban sprawl instead of a Pennine village nestling in the valley); and it should assist in urban regeneration, by encouraging the recycling of derelict and other urban land (Rochdale has enough brownfield sites to meet virtually all of its housing needs and more is likely to become available in the coming years, indeed many new, high density homes are already proposed around Littleborough station and these should be built before any local greenbelt is even considered for release). 2. Sustainability - Traffic - The site will not comply with PfE Objective 7, nor is it consistent with adapting to climate change and moving to a low carbon economy and does not follow guidance in the NPPF Chapters 2 (para 8) and 9. Peak time trains from the two local stations are often at capacity so many new residents will use cars. The surrounding roads are also busy both in the week with commuters and tradespersons as well as at weekends with visitors to Hollingworth Lake. The Rochdale Summary GMTS2040 Implementation Plan 15.10.20, Page 13: "The A58 route through the Borough offers an unattractive cycling and walking environment, with congestion, particularly at peak times, leading to delays to bus journeys, therefore poor

	<p>access to rail / Metrolink stations and town centres as well as to freight and general traffic" and "Particular issues of congestion and delay occurs between Littleborough and M62 Junction 21 via Milnrow" There is no bus access to the Metrolink station in Milnrow and another housing development on Wildhouse Lane is being planned which will further add to the amount of traffic on these roads. In addition Hollingworth Road and the A58 are often used as a diversion route when the M62 is closed, plus air quality has been recorded as very poor on many occasions in this area. A developer contribution will not solve traffic problems.</p> <p>3. Sustainability - Other infrastructure - a primary school below a dam wall is not a sound proposal and although a new secondary school is proposed for Littleborough, no planning for this has yet been submitted and it is possible it will not go ahead in the foreseeable future. GP surgeries and dentists are full and there is no straightforward public transport to Oldham or Fairfield hospitals.</p> <p>4. Flooding - whilst this site is itself not at risk of flooding (unless from Hollingworth Lake) the land currently absorbs much rainfall and has a large pond on it; if built on, even with tree planting and a Sustainable Drainage Plan in place, increased run off to the canal and below is likely (hard landscaping and artificial turf do not assist in slowing rain run off) thus increasing flood risk for the valley below.</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.	I do not consider that JPA 22 Land North of Smithy Bridge can be modified to make it sound and it should be removed from PfE.
Family Name	Barber
Given Name	Jacqueline
Person ID	1287613
Title	JPA 24: Roch Valley
Type	Web
Soundness - Positively prepared?	Unsound
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,	<p>It is unsound on several points:-</p> <p>1. This site is "Protected Greenfield Land". The Rochdale Core Strategy, adopted October 2016, states "G5 - Managing protected open land 1. Protecting open land outside the urban area and not in the green belt. We will continue to protect from development open land outside the urban area</p>

is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

and not in the green belt in the following broad areas: - Land west and south of Middleton; - Land north of Langley/Hollins, Middleton; - Land adjoining the Rochdale Canal and Whit Brook, Middleton; - Roch river valley, Heywood to Rochdale Town Centre; - Roch river valley, Rochdale to Littleborough; and - Land straddling the A627M corridor between Castleton and Kirkholt." So this area of the Roch Valley should be protected from the almost complete urbanisation of this valley (a previous allocation site for the GMSF is currently being built on and this allocation site extends right up to another recent housing development, thus filling in the whole side of the valley). Note some other Rochdale allocation sites are also in this "protected" list. Rochdale has enough brownfield sites to meet virtually all of its housing needs and more is likely to become available in the coming years, indeed many new, high density homes are already proposed in the Rail corridor strategy and these should be built before any local greenbelt is even considered for release.

2. Sustainability - Traffic - The site will not comply with PfE Objective 7, nor is it consistent with adapting to climate change and moving to a low carbon economy and does not follow guidance in the NPPF Chapters 2 (para 8) and 9. Peak time trains from the two local stations are often at capacity so many new residents will use cars. The surrounding roads are also busy both in the week with commuters and tradespersons as well as at weekends with visitors to Hollingworth Lake. The Rochdale Summary GMTS2040 Implementation Plan 15.10.20, Page 13: "The A58 route through the Borough offers an unattractive cycling and walking environment, with congestion, particularly at peak times, leading to delays to bus journeys, therefore poor access to rail / Metrolink stations and town centres as well as to freight and general traffic. There are congestion issues at the junctions with Smithy Bridge Road, Albert Royds Street, Featherstall Road, Townhead and Heap Bridge roundabout"; and "Particular issues of congestion and delay occurs between Littleborough and M62 Junction 21 via Milnrow" (which will include from Smithybridge as both use Wildhouse Lane). There is no bus access to the Metrolink station in Milnrow and another housing development on Wildhouse Lane is being planned which will further add to the amount of traffic on these roads. In addition Wildhouse Lane and the A58 are often used as a diversion route when the M62 is closed, plus air quality has been recorded as very poor on many occasions in this area. A developer contribution will not solve traffic problems.

3. Sustainability - Other infrastructure - although a new secondary school is proposed for Littleborough, no planning for this has yet been submitted and it is possible it will not go ahead in the foreseeable future. GP surgeries and dentists are full and there is no straightforward public transport to Oldham or Fairfield hospitals.

4. Flooding - This site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter 14. The assessment of the flood risk for the site does not fit with reality and the site has some degree of flooding. The grassland currently absorbs much rainfall and if built on, even with tree planting and a Sustainable Drainage Plan in place, increased run off is likely (hard landscaping and artificial turf do not assist in slowing rain run off) thus increasing flood risk for residents in this area and also further down the valley towards Rochdale.

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

I do not consider that JPA 24 Roch Valley can be modified to make it sound and it should be removed from PfE.

Places for Everyone Representation 2021

you have identified above.	
Family Name	Barber
Given Name	Jacqueline
Person ID	1287613
Title	Rochdale - Green Belt Additions
Type	Web
GBA Rochdale - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	Rochdale GBA20 Land at Firgrove Playing Fields, Rochdale Rochdale GBA21 Land between railway line and Rochdale Canal, Littleborough Rochdale GBA22 Land north of St Andrew's Church, Dearnley Rochdale GBA23 Land at Townhouse Brook, Littleborough Rochdale GBA24 Land north of Shore, Littleborough
Soundness - Positively prepared?	Unsound
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.	These additions are drainage basins, playing fields given in perpetuity for sporting purposes, graveyards, etc. which are very unlikely to ever be developed and they generally do not perform the things Greenbelt is supposed to do. I am more than happy for them to remain green spaces but adding them as greenbelt so that the "net loss" of greenbelt is reduced is disingenuous to say the least.
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.	Clearly state the loss of current greenbelt land, not the net loss which will be publicised.