Family Name	Baron
Given Name	David
Person ID	1287086
Title	Stakeholder Submission
Туре	Web
Family Name	Baron
Given Name	David
Person ID	1287086
Title	JPA 19: Bamford / Norden
Туре	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.	Traffic
	JPA19 Bamford/Norden does not comply with PfE Objective7 and is not compatible with climate change to a low carbon economy and NPPF Chapter2 parag. 8 and 9.
	This site is not justified and not consistent with national policy.
	The site will increase car numbers by 900 using roads in the vicinity as JPA19 is not close to local train services or the Metro. The additional traffic will have a detrimental effect on CO2 and is not sustainable.
	Making Norden Road one way will significantly increase traffic on War Office Road resulting in a worsening of air quality and congestion on War Office Road.
	Schools
	JPA19 does not conform with PfE Objective 9 and is not consistent with NPPF Chapter 8 parag 95. The site is not justified and not consistent with national policy.
	JPA19 will result in a significant demand for additional school places.
	Existing schools are full and there is no mention of additional schools for this locality.
	Green Belt
	This site is publicly accessible Green Belt land which is protected by National Planning policy.
	JPA19 does not comply with PfE Objectives 7 and 8 and is not consistent with NPPF Chapter 13 Protecting Green Belt Land.
	The site is not justified, not positively prepared and not consistent with national policy as:

Places for Everyone Representation 2021		
	Many brownfield sites have not been included and it is likely many more will become available as the economy gathers momentum out of the pandemic. These should be developed rather than protected green belt areas.	
	Rochdale does not have an unmet housing need to warrant the building of 450 executive (unaffordable) houses on JPA19 which is protected green belt land. Other options should be considered ie brownfield sites particularly close to transport hubs.	
	Developers have to prove exceptional circumstances by showing they have reviewed all other reasonable alternatives before building on green belt land.	
	Sports and Leisure	
	JPA19 is home to football, cricket and tennis clubs which provide the community with sports facilities are popular and well used. By removing the Green Belt label these areas will become attractive propositions for developers in the future.	
	Paths in the area are well used by walkers ,cyclists, riders and family groups. Development of JPA19 with unaffordable homes will stop the public enjoyment of this green belt facility which is protected by national planning policy.	
	The site does not 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.	
	Flooding	
	JPA19 has considerable clay deposits with natural springs running through. Areas do flood and with heavy and consistent rain this can sometimes be severe.	
	The effect of development would be to concrete over large areas of the site and with the natural soakaways of hedgerows, fields and trees removed there will be an increase in the flood risk.	
	JPA19 fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter14. The site is not justified, not effective and not consistent with national policy.	
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.	The modification I am seeking is for JPA19 Bamford/Norden to be removed from the PfE.	