Family Name	Berry
Given Name	Sarah
Person ID	1286358
Title	Stakeholder Submission
Туре	Web
Family Name	Berry
Given Name	Sarah
Person ID	1286358
Title	JPA 22: Land North of Smithy Bridge
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	There is no unmet housing need across Rochdale to justify building on this site, which is protected greenbelt land.
	exceptional circumstances need to be proven by developers to build on green belt land by demonstrating they have examined all other reasonable options. This has not been proven.
comply with the duty to co-operate. Please be	As we truly come out of the pandemic more brownfield sites will become available these should be used in priority to protected greenbelt.
as precise as possible.	Densities on existing brownfield sites should be increased.
	Therefore, other reasonable options exist and there are no exceptional circumstances to justify building 300 executive detached houses on protected greenbelt 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
	Traffic:
	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 area has increased traffic already due to being in very close proximity to Hollingworth Lake, a tripadvisor award winning attraction, that sees hundreds of visitors on a daily basis.
	The site is not justified and not consistent with national policy.
	The site is not accessible to the Metro (4km away, with no direct bus link)
	local train stations struggle to meet rush hour demand therefore many will

use cars which will significantly increase CO2 and is not sustainable.

## Places for Everyone Representation 2021

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

The cumulative effect of all proposed building locally must taken into consideration. This proposed site would be directly adjoining another with a proposed 169 houses, and very close in proximity to another, with a proposed 200. That s a huge burden on an already struggling infrastructure.

## Schools:

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.

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

The new primary school being built on Calderbrook Road is for two form entry. The current one is two and a half form entry. This means the area is losing primary places.

## Flooding:

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

The site is not justified, not effective and not consistent with national policy.

The assessment of the flood risk for the site does not fit with reality. The site has some degree of flooding.

Any building on greenbelt/ green field land within Littleborough & Smithy Bridge could contribute to more instances of flooding. In 2015 Littleborough flooded, and this was with the Green land we have today. Bricks, tarmac and flagstones don"t absorb water. Every house built chips away at the vital protection the greenbelt land provides. If these houses are built the "once in a lifetime" 2015 floods could become more common.

Building on greenbelt land means concreting over open fields and removing trees that will soak away any flood waters and therefore will pose a significant flood risk.

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, the acute shortage is for truly affordable homes.

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

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.

## Places for Everyone Representation 2021

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.

The site is an important area next to Hollingworth Lake and supports a vast array of animal and bird species, including protected ones such as bats.

This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment. This land was used by thousands of residents during the pandemic, and is still used daily by many.

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.

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 that I am seeking is for JPA 22 Land North of Smithy Bridge to be removed from Places for Everyone.