

Family Name	Cummings
Given Name	Michael
Person ID	1286646
Title	Stakeholder Submission
Type	Web
Family Name	Cummings
Given Name	Michael
Person ID	1286646
Title	JPA 19: Bamford / Norden
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>I can see no exceptional reason for developing the greenbelt for housing needs that are not unmet, Rochdale has almost already the full allocation for new homes required to be built. There are numerous brownfield sites throughout the boroughs of Rochdale which are better connected to public transport links, amenities and places of employment. The plans once again propose high cost housing on previously undeveloped land to achieve maximum profit for developers and income to the local council via council tax charges without addressing the need for affordable housing or due regard to the character of the area or its wildlife. Given the amount of derelict land within the Rochdale, particularly around the center of the town, there is adequate alternatives which will provide far more sustainability with regards to land use and environmental impact.</p> <p>Public transport links are very poor at this location with dreadful bus routes which make visiting places like Manchester a slow and painful process. Given the likely prices of the proposed scheme it is reasonable to expect another 900 vehicles to be added to the conurbation which is already stressed during morning and evening peak travel times. Standing vehicles will be reducing the air quality further for existing residents who live adjacent to arterial roads (electric and stop start do not fully mitigate this as tyres and brake dust are also important factors).</p> <p>The plan does not demonstrate a commitment to reducing the impact of climate change through innovative use of building materials or transport options, rather more of the same which will further increase demand for gas and electric for heating and increase consumption of water and production of sewerage. Rainfall, if discharged via combined sewerage will contribute to additional instances of sewer flooding (a major issue on the river Roch which is festooned with sewer litter after high flows), or will be fast tracked into the Roch catchment via surface water drainage further exacerbating flooding issues downstream which are becoming more frequent and</p>

financially impactful. Existing technologies to impound or use rainfall instead of drinking water for washing and cleaning once again seem beyond the grasp of planning along with constructing carbon neutral housing. As usual, the plans look set to create or exacerbate problems which are near impossible to mitigate once they have occurred - this should be a responsibility of vast profit making developers and planners rather than the taxpayer further down the line.

Public services have deteriorated as there is not sufficient capacity to meet growing needs. Increasing population density which places further pressures on services such as doctors surgeries and schools is not going to be outweighed through these additional council tax contributions.

There is no meaningful plan as to how biodiversity loss from the area to be developed is going to be mitigated anywhere in this or any of the other plans. The LA does not have the remaining land assets to provide off-site provision and it is unlikely non-public land is going to be managed to provide the amount of high quality habitat required. No meaningful provision is catered for in the development which makes this yet another outdated proposal which will further cement the UK's record of being one of the most biodiverse depleted countries in Europe. Whilst there are numerous case studies of how building and landscapes can be planned and constructed in such a way that biodiversity is enhanced this is another example of building the houses of yesterday for tomorrow.