

Places for Everyone Representation 2021

<b>Family Name</b>	Earl
<b>Given Name</b>	Yvonne
<b>Person ID</b>	1287405
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Earl
<b>Given Name</b>	Yvonne
<b>Person ID</b>	1287405
<b>Title</b>	JPA 19: Bamford / Norden
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>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.</b>	<p>-According to Places for Everyone (PfE) Rochdale Metropolitan Borough Council (RMBC) have a Local Housing Need (LHN) of 8,048 and land available for 7,997 houses. Therefore, RMBC has a negligible unmet housing need and there are not the exceptional circumstances necessary to release a greenbelt site such as JPA.</p> <p>-The National Planning Policy Framework (NPPF) para 141 states, "Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."</p> <p>There are sufficient brownfield and greenfield sites across Rochdale to meet 99.4% of its LHN and sufficient brownfield and greenfield sites across Greater Manchester to provide the LHN of 164,880. These are reasonable options to meet the identified development need therefore the exceptional circumstances to justify changes to the greenbelt boundary do not exist.</p> <p>-The site provides an important green corridor to Ashworth valley and supports large numbers of animals, birds and insects.</p> <p>-There are large sections of hedgerow, wildflower meadows and mature trees that would be lost if this site is developed. Removing this habitat will result in the decline of mammal, bird and insect populations in the area.</p> <p>-The current vegetation naturally removes various harmful elements of car exhaust fumes. Concreting over this site will lead to a reduction in air quality. This is particularly concerning given its proximity to an area of air quality concern by St Michael's primary school.</p> <p>-The building of 450 houses and associated increase in cars of approximately 900 will further reduce air quality. There will be many more sole use car trips as cars will be necessary for commuting and getting children to schools.</p>

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-The site is prone to flooding, the concreting over of the site will reduce the land available to act as a soak away resulting in increased surface water and increased risk of flash flooding.

-As well as the environmental value, this site has a high amenity value, it is well used by large sections of the local population. But for elderly people like myself it is particularly important as it is flat and open and well used therefore it is safe when walking alone.

The site does not comply with:

-PfE Objective 7 it will not minimise the need to travel and the removal of the greenbelt and replacing it with a housing development will increase air pollution.

-PfE Objective 8 PfE Object 8 it will reduce green infrastructure and biodiversity. Reduce access to the natural environment. Reduce climate resilience and increase surface water and risk of flash flooding.

-PfE Objective 10 this development will reduce access to the natural environment and green spaces and therefore reduce the health benefits of this access.

-NPPF exceptional circumstances to justify changes to Green Belt boundaries.

-NPPF Chapter 15 Conserving and enhancing the natural environment.

**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.**

Removal of site JPA 19 Bamford/Norden from the PfE plan