

Family Name	Garvey
Given Name	Dermot
Person ID	1286528
Title	Stakeholder Submission
Type	Web
Family Name	Garvey
Given Name	Dermot
Person ID	1286528
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?	No
Compliance - In accordance with the Duty to Cooperate?	No
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>The proposal fails on several bases including:</p> <p>Traffic: the site is not consistent with national policy nor is it justified as the roads cannot accommodate extra traffic, train and tram stations are miles away meaning that traffic volumes will soar, the local air quality problems will be exacerbated, the proposed one way system will increase congestion and pollution on particular roads.</p> <p>Traffic: it is not consistent with climate change objectives, nor with NPPF Chapters 2 and 9 nor with the PfE objective 7.</p> <p>Flooding: the site is not justified and not consistent with national policy. The flood assessment is naively optimistic and ignores annual flooding in the location. Removal of trees, hedges etc removes natural soakways which will increase the propensity to flood. The local geology is heavy clay - naturally antipathetic to water drainage. The</p> <p>Flooding - it does not comply with PfE Objective 2 nor with NPPF Chapter 14. The proposals are not effective.</p> <p>Green Belt: lack of compliance with PfE Objectives 7 and 8, and nearly 90% of the selection criteria. The proposal is not consistent with sustainable development and NPPF Chapter 13.</p> <p>Site isn't justified nor positively prepared and not consistent with national policy as:</p> <p>no unmet housing need in the borough to justify green belt building; no demonstration of proof by developers of exceptional circumstances to build on green belt; densities on brownfield site should be increased especially near transport hubs; retail and factory site continue to close thereby generating more brownfield sites.</p> <p>Schools: the site fails to comply with PfE Objective 9 and is not consistent with NPPF chapter 8 (para 95).</p>

Places for Everyone Representation 2021

	Schools: the site is not justified and is not consistent with national policy. Existing schools are full. Local need is barely, if at all, met.
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.	Remove the JPA 19 Bamford/Norden proposal from the PfE.