Family Name	Hazell-Scott
Given Name	Barry
Person ID	1287303
Title	Stakeholder Submission
Туре	Web
Family Name	Hazell-Scott
Given Name	Barry
Person ID	1287303
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 comply with the duty to co-operate. Please be as precise as possible.	 Green belt: The site fails to comply with PfE Objectives 7 and 8, and 6 out of the 7 Site Selection Criteria. It is not consistent with sustainable development and NPPF Chapter 13. The sites are not justified, not positively prepared and not consistent with national policy because:
	 There is no unmet housing need across Rochdale to justify building on protected greenbelt land.
	- Developers have to prove exceptional circumstances to build on greenbelt land by demonstrating they have examined all other reasonable options.
	- Many brownfield sites are not included and many more will become available as we come out of the pandemic, these should be used in priority to protected green belt. There are enough brownfield sites in Rochdale to meet nearly all of the housing need.
	- Densities on existing brownfield sites close to transport hubs should be increased.
	The national planning policy framework states greenbelt serves five purposes:
	(a) to check the unrestricted sprawl of large built-up areas;
	(b) to prevent neighbouring towns merging into one another;
	(c) to assist in safeguarding the countryside from encroachment;
	(d) to preserve the setting and special character of historic towns; and
	(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

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	- Therefore, other reasonable options exist and there are no exceptional circumstances to justify building 510 executive houses on greenbelt and greenfield (protected open space) land.
	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.
	- The existing roads will not accommodate the extra traffic of 1000 additional cars and the traffic assessments are unbelievably optimistic.
	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.
	$\hfill\square$ 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.
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	JPA 22 land north of Smithybridge and JPA 24 Roch Valley be removed from the PfE
above.	

Family Name

Hazell-Scott

Places for Everyone Representation 2021

Given Name	Barry
Person ID	1287303
Title	JPA 24: Roch Valley
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