

Family Name	Lewis
Given Name	Barry
Person ID	1286181
Title	Stakeholder Submission
Type	Web
Family Name	Lewis
Given Name	Barry
Person ID	1286181
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>Flooding (based on personally experiencing 3 flood events)</p> <ol style="list-style-type: none"> 1. The assessment of this risk is inaccurate and inadequate - there are regular minor flooding events each year witnessed by local people. 2. There are natural springs and heavy clay soil across the area. Manchester University dept Environmental studies provided evidence of this during our flood legal actions. 3. Building on this land using concrete and hard core filling will increase significantly risk of further flood events due to surface water increases and removal of trees and hedgerows that soak away water currently. 4. The site is not consistent with national policy on flood containmernt and management. <p>Traffic</p> <ol style="list-style-type: none"> 1. There is no public transport infrastructure in place other than bus services. Car usage will increase significantly adding to pollution,(until we are fully electrically driven) and congestion permanently. This will negate the current air quality management zone. 2. Sustainable transport is not promoted in the allocation. 3. Existing roads could not possibly accommodate the number of cars expected to use them from a 450 executive home development. 4. Access to Rochdale, Bury and Manchester is by roads currently "at capacity"and congested for hours every day. This will have a direct effect on traffic through Heywood greatly increasing pollution around the 2 Primary schools on Queens Park Rd. 5. The proposal therefore does not comply with FfE 7. <p>Services</p>

1. There is no additional school provision in the proposal yet a prediction of an additional 700-1000 children of school age is not unreasonable.
2. The additional traffic as a consequence of transporting these children to schools out of the immediate area will be unmanageable.
3. PfE 9 and NPPF chapter 8 objectives are therefore being ignored.
4. The increased population in the area will require Primary Care medical and dental services. There is no proposal for building new facilities nor how practitioners will be attracted given the ongoing shortage of GPs, Dentists and Nurses.

Housing needs

1. Rochdale MBC has no demonstrated unmet needs for local housing having published its requirement of 8048 houses and existing land for 7997.
2. The proposal is for large detached executive homes, these will not meet the borough"s need for affordable homes.
3. The "profit motive"will drive building on this site in preference to brownfield site affordable home development.
4. It is, therefore, not compliant with PfE Objective 2 nor consistent with NPPF chapter

Wider environment

1. Ashworth valley is an important wildlife site of historical significance. It provides a haven for many animal and bird species, some of which carry "protected"status.
2. The whole area incorporating the site and Ashworth Valley is a significant local and wider environmental amenity. The natural environment would be significantly and permanently diminished by development. This is counter to PfE Objective 8 and NPPF Chapter 15
3. The site is used for local sports and is a significant natural amenity for walkers, cyclists and horse riders. Destroying this to build unnecessary "executive"homes is counter to "sustainable development"and fails to comply with PfE Objectives 7, 8 and 10 and inconsistent with NPPF Chapter 8.
4. The proposal takes no account of climate change, is therefore non compliant with PfE Objective 8 and not consistent with NPPF Chapters 2, 9 and 14

Development options

1. Rochdale MBC has not proposed effective use of brownfield sites close to transport and infrastructure hubs.
2. The proposals for the site are at a "low density"and consequently risk unnecessary spread into environmentally significant areas.
3. PfE Objective 2 and NPPF Chapter 2 are not being consistently complied with.

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 level of non compliance with PfE Objectives is staggering.
JPA 19 Bamford/Norden should be removed from the PfE