

Family Name	Lymer
Given Name	John
Person ID	1286723
Title	Stakeholder Submission
Type	Web
Family Name	Lymer
Given Name	John
Person ID	1286723
Title	JPA 19: Bamford / Norden
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Sound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	NA
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 site is on legally protected Green Belt, but the need for building on Green Belt has not been justified and the Plan not positively prepared. The number of housing units needed is almost identical to the number which can be delivered without impinging on Green Belt. The Housing Topic Paper says "it is considered necessary to identify sufficient land to provide for flexibility and choice in housing delivery". This statement is very weak and does not constitute a reasonable justification. Furthermore, there is also a large over-supply of land for office space. Reviewing this would seem to offer potential for flexibility in adequately meeting housing supply needs. Thus, the site is not consistent with sustainable development.</p> <p>The sports pitches and facilities are earmarked for enhancements into a "recreation hub", yet the Green Belt designation of these areas is to be removed. These areas are not required to meet development needs now, so loss of their protected status is unjustified.</p> <p>There are gaps in the assessments of brownfield sites. Addressing these would avoid the need for development sprawling onto protected Green Belt. For example, the former Turner Brothers Asbestos site NW of Rochdale town centre is within 0.5 mile of the town centre boundary and spans between an area of severe deprivation and one which is much less deprived. Whilst expensive to remediate, such a site could deliver a significant number of housing or employment units, but no proposals are put forward for this site. So the Plan has not been positively prepared and development is not justified and not consistent with national policy.</p> <p>The Transport Supporting Statement identifies that the local highway network does not have any significant capacity constraints. Alterations to traffic light sequencing is proposed, along with minor road modifications and 2 new access roads on/off the site. Most local people would disagree strongly with the Plan's assessment. I was unable to find supporting data within the documents, such as from traffic surveys, to inform the view that there are</p>

no current traffic problems, so this aspect of the Plan has not been positively prepared or justified. Despite proposed measures for bus and other travel, the reality is that most new residents will have a car. There are long tailbacks in morning and evening peak times, not just on Norden Road and Bury & Rochdale Old Road, but also on Queens Park Road and coming from Bury and Rochdale.

The site will inevitably increase car numbers and journeys on local roads, increase traffic emissions and harm air quality. And all despite claims of sustainable transport improvements, largely because a bus route goes past it. That same bus route can't be "rapid" if buses are stuck in traffic. So the plan is not positively prepared, not consistent with national policy and not justified.

Overhead cables will remain on the development site and across the surrounding areas. The cables will span above the green infrastructure bordering Jowkin Lane. The presence of high voltage overhead power lines will detract significantly from true green infrastructure along this site boundary. Thus, the site does not constitute sustainable development and therefore fails to be consistent with national policy.

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.

Site JPA 19 should be removed from the Places for Everyone Plan because the proposal is unsound and not legally compliant.