

<b>Family Name</b>	Mckenniff
<b>Given Name</b>	John
<b>Person ID</b>	1287384
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Mckenniff
<b>Given Name</b>	John
<b>Person ID</b>	1287384
<b>Title</b>	JPA 2: Stakehill
<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>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<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>The evidence to support the case for "Exceptional Circumstances" to justify the release of Green Belt has not been made. The Plan has not adequately assessed reasonable alternatives in advance of seeking the release of land from the Green Belt contrary to the provisions of national policy. It is not a suitable and sufficient assessment. Rochdale would benefit from the consideration and remediation of its many brownfield sites within the borough rather than supporting the developers preference of greenfield first as it maximises profit. The current plan is an opportunity lost to prioritise and remediate brownfield, despite the claim that this is its priority. The site does not comply with the specified criteria. Criterion 1 - It is not land that has been previously developed and/or land which is well served by public transport - any development would be reliant on transport by car. Criterion 4 - It is not land within 800 metres of a main town centre boundary. Criterion 5 - Developing the land would not have an impact on urban regeneration it is in fact the opposite as the land is a leisure resource for the existing surrounding urban areas. Developing it would have a negative impact for the vast majority of people in the surrounding urban areas. Criterion 7 - It is not land where developing it would deliver significant local benefits by addressing a major local problem/issue. Again it is the opposite, development would lead to increased road congestion, pressure on schools, increased risk of flooding amongst other infrastructure type issues which are already over stressed.</p> <p>Building on the allocation would not be sustainable development. It would increase flood risk, and have a negative effect on biodiversity, and increase air, noise and light pollution. The scale of the development would swamp the existing housing stock and destroy the existing local communities forever. A smaller scale development on non-greenbelt land might actually benefit and strengthen the existing local community.</p>

**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 existing Plan should undergo regular reviews and updates over the plan period, By doing this the release of Green Belt could undergo appropriate re-evaluation as to it's inclusion in allocations.

It is essential that brownfield options should be continually reassessed to ensure that there is a continued focus on these areas before the release of Green Belt.

JPA2 Stakehill should be reassessed against the Site Selection Criteria and withdrawn. It clearly is not suitable according to this criteria and is clearly only included as it is the preference of house builders as it is cheaper and more profitable to build on.

If development was to proceed infrastructure requirements to support the proposed development would need to be properly assessed and additional requirements put in before any development proceeds.

A suitable and sufficient evaluation of sustainability and biodiversity issues would need to be undertaken and appropriate infrastructure to prevent flooding be put in place and suitable and sufficient measures taken to prevent the loss of biodiversity.