

Family Name	Ripley
Given Name	Simon
Person ID	1287507
Title	Stakeholder Submission
Type	Web
Family Name	Ripley
Given Name	Simon
Person ID	1287507
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?	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>There are many areas where these proposals are not justified, not positively prepared and are not consistent with national policy guidelines and I highlight some of these below.</p> <p>Rochdale MBC has a local housing need of 8048 homes and has been shown to have land available through brown field sites for 7997. The council are proposing to build an unnecessary extra 4000 homes above its housing need allocation and to do this they wish to release nationally protected green belt land. The council and developers have not demonstrated any exceptional circumstances to prove they need this land to fulfill its allocated housing need. The housing densities of Rochdale sites are low and following national guidelines for the existing brownfield sites would see them accommodate the housing need with no need to build on green belt land. The proposals are for executive homes, the area having a good stock of these already and there is little provision for affordable housing. If the green belt is released, there is a real fear that developers will go straight to building on this more profitable land, and brownfield sites may be left, leaving the borough with continuing neglected brown field sites. These factors show the DfE is not positively prepared as it is not consistent with achieving sustainable development. It fails to comply with PfE objective 2 and is not consistent with NPPF chapter 2, 11 and 13.</p> <p>The proposal is not an effective form of development when climate change is considered. The large executive homes planned on the green belt land are not efficient development when considering their CO2 output and the subsequent vehicle emissions that would ensue. The site is 6km from the nearest metro and there are no other transport hubs within any close proximity. This means a huge increase in cars and emissions 150 m away from an existing air quality management zone (next to a primary school-air quality already being a matter of concern at this site). The existing roads already get clogged with traffic and the traffic assessments produced for PfE</p>

are not credible. This means it fails to comply with PfE objective 7 and is not consistent with adapting to climate change, moving towards a low carbon economy and NPPF chapter 2(para8) and 9.

With climate change in mind and the likely hood of wetter weather patterns, the site assessment for flooding is a complete fabrication. This site floods more than once every year and this is with the site undeveloped. I witness it flooding regularly over winter and spring months. The land has many natural springs and has a heavy clay soil, details giving rise to Clay Lane, Spring Bank Lane and The Springs all adjacent to the site. If this site is developed , there will be nowhere for this flood water to run apart from other existing roads and properties. The drains have no capacity to deal with the extra volume of water that will run off this site. PfE objective 2 is failed and it is not consistent with NPPF chapter 14.

The plan also fails PfE objective 9 and is not consistent with NPPF chapter 8 (para95) with there being no provision for schools. The existing local schools are over subscribed and there is no increased provision proposed. The children who will have no school places to attend are also at risk from the two sets of electricity pylons that run through the centre of the site , whereby international studies have proven an increased risk of leukaemia for children living within 50m of the pylons . PfE objective 10 failed and not consistent with NPPF chapter8.

These list some of the issues arising from developing this protected green belt land and how the PfE is failed on its own terms by proceeding with the said building. Developing this land would greatly affect the health and wellbeing of thousands of local residents. It is the only green space in the vicinity which is easily accessible and has public access through a labyrinth of public footpaths. it is used by thousands of people constantly. One week in march 2021 saw over 2000 walkers, children, cyclists and horse riders using this amenity helping their mental health and well being. The proposals would also see protection removed from several football pitches, a cricket club and a tennis club, all used by 1000"s more each week. It is highly likely that once they loose their protected status that they too will come under the threat of profit chasing developers.This all fails PfE objective 8 and 10 and is not consistent with chapter 8 of NPPF.

The council have fallen short in their community involvement in the consultation by effectively making it an online only process. Many elderly do not have the IT ability to access the consultation and for poorer residents for whom a mobile phone may be the only internet access, they will find it nigh on impossible to be able to access all this documentation on a mobile phone. there have been no meetings or workshop arrangements . The local library , with limited opening hours, has a paper copy similar to a phone book, which cannot be taken away for study. This has greatly limited consultation to many residents in contravention to the proposals and failed in their duty to cooperate.

It is difficult to find any reasons which actually support the proposals given PfE"s own remit.

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 modification required is to remove site JPA19 Bamford/Norden from PfE .