Family Name	Smith
Given Name	Angela
Person ID	1286190
Title	Stakeholder Submission
Туре	Web
Family Name	Smith
Given Name	Angela
Person ID	1286190
Title	JPA 19: Bamford / Norden
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.	development and NPPF, chap.13.
	iustifies the use of Green Belt land for building.
	2)Developers need to prove exceptional circumstances before building on protected Green Belt land.
	3)There are many brownfield sites which have not been included in the plan. It is expected that more will become available as we move out of the pandemic and these should be prioritised before building on Green Belt land. "Windfall sites" have not been considered.
	4) This area has no transport hubs. Brownfield sites with easy access to transport hubs should be used first.
	5)This site does not comply with Objective 7 and is not consistent with adapting to climate change.
	6)It is not justified nor consistent with national policy, being inaccessible to either the Metro, which is 6 kms away or to train stations in both Rochdale or Bury. Therefore increased use of cars from residents of the site will increase CO2 emissions and this is not sustainable.
	7) There is an air quality management zone within 150 metres of the site, which is next to a Primary School. Air quality will become much worse in this area if the site is developed.
	8)Local roads are not suitable to take a further 900 cars, traffic assessments are not realistic.
	9)Making Norden Rd one-way will force all traffic down War Office Rd. Far more houses on War Office Rd than on Norden Rd face directly onto the

Places for Everyone Representation 2021	
	road itself so air quality and congestion on War office will become much worse.
	10) Schools: the site does not comply with PfE Objective 9 and is not consistent with NPPF chap. 8, para 95 therefore it is not justified nor consistent with national policy.
	11)Local schools are already oversubscribed, with pupils choosing to travel to them from other areas of the borough. It is vital that there is a choice of school places available to meet local needs. However, there is no proposal for additional schools to be built near this site.
	12) Flooding: the site fails to comply with objective 2 and is inconsistent with NPPF chap 14. Therefore it is not consistent with national policy. The flood risk assessment is not realistic. There is some degree of flooding annually and this is sometimes severe. The site is heavy clay, with natural springs running through it. Please note the names of local streets: Clay Lane, Spring Bank Lane. Concreting over Green Belt land , removing trees and hedgerows which will soak away flood water will pose a significant flood risk to this whole area.
	In addition to the above points, this is the only area of green recreational space in Bamford and during the recent lockdown restrictions it was extensively used by walkers, cyclists, runners, horse riders and dog walkers. It has been a great contributor to the mental health and wellbeing of residents. It is an area of great natural beauty with a diverse array of wildlife, including badgers, deer and dormice, in addition to the wide range of trees and flowers growing there. At a time when we have declared a
	climate emergency it is hard to understand why the authorities are so keen to destroy this area by building houses and roads which will inevitably increase emissions of CO2, contributing to poor air quality and 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 above.	JPA 19 Bamford/Norden to be removed from PfE