

Family Name	Smith
Given Name	Susan
Person ID	1287585
Title	Stakeholder Submission
Type	Web
Family Name	Smith
Given Name	Susan
Person ID	1287585
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?	No
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>The Places for Everyone Document is unsound because</p> <ol style="list-style-type: none"> 1.The Bamford/Norden site is protected Green Belt. The NPPF Chapter 13, 147/148 clearly states that Inappropriate development which is harmful to the Green Belt should not be approved unless in very special circumstances, which do not exist unless the potential harm to the Green Belt is clearly outweighed by other circumstances, which in this case, they are not. 2.Places for Everyone has failed to prove any such exceptional circumstances. NPPF Chapter 13 138 e) requires that the purpose of Green Belt is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. P for E fails to meet this requirement. There is, approximately one mile from the proposed GB site in Bamford/Norden, a brownfield site of similar size, the derelict site of an old factory complex, TBA, off Rooley Moor Road, Rochdale, OL12 area. The site is apparently contaminated with asbestos, has been derelict since the early 1990"s, and successive RMB Councils have each successfully failed to deal with, kicking it down the road for someone else to deal with, for the past 30 years, commissioning surveys as to its suitability for building, but getting no further than that, though the surveys appear to show that the contaminated land could be cleared and become suitable for building. This has been ignored, presumably because of the cost to either the landowners or the developers. <p>The last survey was in 2015, well before the Spatial Framework plan which preceded Places for Everyone, and this site was not even considered then, or now. RMBC do not own the land, but as P for E has given itself CPO powers, this would seem to be an ideal opportunity missed, to regenerate this land within the NPPF policy, without building on Green Belt. Maximising financial profits for the Developers by building on virgin green belt rather than first clearing contaminated land does NOT qualify as exceptional circumstances. Someone is going to have to deal with this land sooner or</p>

later, P f E, would have been the ideal time, and therefore this P f E is unsound, and has not met the NPPF criteria for brownfield sites first.

3.The site fails to meet the criteria off NPPF Chapters 2, paragraphs 8 and 9, moving to a low carbon economy, and Chapter 14, adapting to Climate Change. The site is over 6 kilometres from the nearest Metro and train Stations, and the expectation that everyone will use the proposed bus, which PfE admits may not materialise, not their cars, are wildly optimistic. It is easily a 10-minute walk from the top of the site to the nearest bus stop, uphill on the way back, and the expectation that people will do this, often in the rain, or with children to get to school first, when they have upwards of 2 cars sitting on their drives in these new "high end" family homes is frankly ludicrous.

4.The additional 900+ cars this proposed development will greatly add to the already poor air quality of the nearby roads. PfE acknowledges that the existing road network will need to be changed to accommodate this, and proposes a one-way system, diverting all traffic, plus an additional 900 cars, down one road instead of the 2 minor roads currently in use, both of them unclassified roads and not even big enough to be classed as "b"roads, with both already highly congested, with slow-moving cars waiting to turn at the lights. This will concentrate and double the pollution levels onto the one road they propose to use, a residential street, and create "rat runs"on the side roads, also residential, as people try to find a way through the stationary traffic.

5.PfE contravenes practically every aspect of NPPF Chapter 8, Promoting Healthy and Safe Communities, especially 98, Open Space and Recreation. The site in its present form is the ONLY accessible open space in the area, and is widely used by all members of the community, not just those who use the sports facilities PfE plan to keep. There are families with children too young to use the sports facilities, older people, and those who don't do organised sport, dog walkers, joggers, amblers and ramblers, bird watchers, nature lovers and wildlife watchers to name but a few, all of whom use this site on a regular basis. There was almost unanimous local opposition to the plan to build on this green belt when it was first proposed as The Spatial Framework, and changing the name to Places for Everyone has not changed this. All that has changed is the way that objections can be registered this time, having been made so difficult that a degree in planning law is the first necessity to objecting NPPF 98, Open Space and Recreation states that access to a network of high-quality open space and opportunities for sport and physical activity is important for the health and well-being of communities. P f E choses to interpret this as leaving the existing sports facilities in place, and providing paths round the outside of the football fields, and between the new houses, for everybody else, which can hardly be described as high-quality open space.

Places for Everyone JPA 19 Bamford/Norden is unsound within NPPF; it contravenes its own objectives 7 and 8; it fails to comply with 6 out of 7 Site Selection Criteria; it is not justified, nor thoroughly researched, and fails to meet its objectives.

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.

JPA19 should be taken out of Places for Everyone completely, and brownfield first should be the policy adopted. It is not possible to make this plan sound within NPPF and its own objectives because of its geographical location.