

Places for Everyone Representation 2021

Family Name	Williams
Given Name	John
Person ID	1286683
Title	Stakeholder Submission
Type	Web
Family Name	Williams
Given Name	John
Person ID	1286683
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?	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.	<p>This plan is unsound because:-</p> <p>the site fails to comply with PfE objectives 7 and 8, and 6 out of the 7 Site Selection Criteria. It is not consistent with sustainable development and NPPF Chapter 13.</p> <p>1 This is Green Belt land which is an important local amenity for Sport, Leisure and as as Working Farmland. During Covid lockdown it was enjoyed by hundreds of people who came because it is a beautiful area in its own right and because they derived pleasure from something they discovered, to their delight, was on their doorstep. There is no reason why this site should be selected other than for the requirement that Rochdale Council who as I understood (when attending a Town Hall consultation on 4th February 2019) felt under pressure from GMA to provide a green area to satisfy the new 10 Council "Spatial Framework". I had the very strong impression that Rochdale Council was required to contribute their share. No consideration therefore was given to other reasonable options , brownfield sites etc, This may explain the paucity of any any data from the Council or Developers to demonstrate actual demand .</p> <p>Environmentally this site is important;it always been known as a host to foxes and badgers who breed there. It is also a floodplain into which local culverts drain. Most of the land is sodden, with a water table a few centimeters below the surface and there are natural springs on site. It is green for a reason. It serves a purpose which therefore is easy to ignore but water has to dealt with somehow, And now we have a lot. 2 Schools doctor's surgeries' and other facilities. These are full locally.The site fails to comply with PfE Objective 9 and is not consistent with NPPF Chapter 8 (para 95) and thus it is not justified and consistent with national policy. There are insufficient school places. Cutgate surgery has 2,400 patients per doctor as opposed to 1,800 in the rest of the Borough. All other surgeries are inSpotlant or Heywood, There are none closer, 3 Flooding. The site fails to comply with PfE Objective</p>

2 and is not consistent with NPPF Chapter 14. The site is not justified, not effective and not consistent with national policy. Greater Manchester Council themselves commissioned Ove Arup and Partners to identify Climate change in Greater Manchester (GMC Spatial Framework 17.1.2019 page 4.2.6.1. Flood risk " The main risks to Greater Manchester as set out in this report are Direct impact of flooding such as flood damages to people's homes and the psychological stress this can cause victims. Local Authorities are required to produce Strategic Risk Assessment, it should be noted that all 10 Lead Local Authorities must produce local flood management strategies which are required under the Flood Management Act 2010". "The Level 1 Strategic Flood Risk Assessment For Greater Manchester states that the 'surface flood risk could be the biggest obstacle to development in Greater Manchester in flood water terms with 35% sites in Greater Manchester at high risk from surface water with Rochdale, Wigan and Bury the worst areas. ' " This is an area which has, since 2000 experienced massive downpours. REDACTED TEXT Heavy rainfall the like of which I have never seen before have occurred in 2000,2001,2004,2015 (When Rochdale council offices and the town were flooded out) more recently 16th March 2019 with Rochdale town centre again flooded , 27/28 July (4" rain on Rochdale over the 48 hour period), also 31st July and 1st August 2019 (torrential rain here) 9th February 2020 (One of the most torrential rainstorms recently encountered flooding along Clay lane breaking through to Linnel Drive), also 7/9/2019, 15/16th February 2020, 16/6/2020 (Asda in Mellor Street flooded) and so on. My calculations show that the northern area of the proposed site (approximately 40 acres) when built upon with non absorbent buildings, roads ,roofing, paving and so on, will result in a "flashoff" of 1.5 million gallons or 6,300 tons of water assuming 35.4 mm of rain in 12 hours which was the amount that fell on Rochdale on Boxing Day in 2015. The topology of the site would bring about extensive flooding and damage. Simply because this site is currently grassland means that no one has given thought to just how much water is drained away by the fact that it is the local floodplain. Additionally, where will all this water then be taken?has the Local sewage and water system ever been upgraded? How will all this water be taken away and treated? My calculations show that a 2m diameter pipe as used for estate drainage would need to be some kilometers in length to accommodate rainfall of this magnitude. To prevent flooding, water has to be taken away immediately. What work has been done on this? Just remember that this flooding issue is now and ever- present possibility, It must be planned for it will not just go away. It is not a question of if, its a question of when. Any failure to consider and take appropriate steps to recognise this near future certainty and deal with it in relation to this site will in my view have exercised wilful neglect. The Ove and Arup Report makes it clear that the Council would be in breach of its statutory responsibility.

4 The High Voltage electricity Power lines, two of which cross the site. The site is not justified, not effective and not consistent with national policy, it fails to comply with PFT Objective 2 and is not consistent with NPPF Chapter 14. There are two power lines crossing the site and there are significant environmental hazards; a) As recognised by 1997 there exists and electromagnetic field along the length of the lines. Since there are two lines,one of 135000 volts and the other of 275000 volts, those living in the vicinity will be exposed to the constant electromagnetic field. Individuals vary in their susceptibility to this but I would not wish to live in such close proximity. b) Another more recently identified problem is that high voltage cables ionise particulates,water vapour ,pollution, particulates, dust etc. Remember that most rainfall is from the South West which means that water vapour will blow across the lines and directly onto the site,thus increasing overall exposure,These ionised particles will be breathed in and can adversely affect soft tissues, lung tissues etc. Cancers may result, Combined with particulates from road vehicles,let alone the gas central heating effluent from 450 houses, those living at the conjunction of the lines at the southern end of the site may not be guaranteed the healthy fresh air and environment expected. I feel

strongly that purchasers should be made aware of this potential hazard. 5 Traffic The site fails to comply with PfE Objective 7 and is not consistent with adapting to climate change, moving to low carbon economy and NPPF Chapters 2 (para 8) and 9. The site is not justified and consistent with national policy. a) If the executive jobs are in Manchester itself (I can hardly see that Rochdale will generate them) then those living on the new estate will need to head south each day to go to work. This will mean 450 plus cars moving through Queens Park Road which is already congested morning and evening. The "high quality" public transport alternative is simply not there and anyway a tram system could not negotiate the natural funnel, south, of Queens park road. I believe the planners are considering a link between Heywood and Rochdale, but what use would that be? b) The site is nowhere near the existing Metro link which is several km away, c) There is a school nearby and an air quality management zone within 150 m of the site, so additional cars say even 900 would not fit in with air quality. d) The proposal to make a one way system by the estate development would just make War Office Road more congested and polluted. With all the developments in the area over the past 30 years there is no more road space available. 6 Unintended consequences. The site is not justified and not consistent with the personal safety of riding school users along Jowkin Lane. This unmade lane forms the South East periphery of the site. It is used by walkers, cyclists, horse riders etc . Any vehicular traffic able to gain access to this lane would put all such users in danger . This is a real concern because the pressure of vehicles on existing roads would encourage drivers to take a shortcut from the site to gain access to School Lane and thence Bury Old Road. There is also a large stables at Waterloo Farm, just at the point where traffic would move from the site to School lane. This is a threat to all those enjoying leisure activities here.School Lane is designated a " Quiet Zone" and the Council has installed traffic calming measures.Obviously, the possibility I have outlined would be in conflict with this.

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.

This allocation should be removed from PfE because the site is publically accessible Green Belt which is protected by national planning policy.