

Places for Everyone Representation 2021

<b>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality2.jpg</a> <a href="#">PFE1287459_AirQuality.jpg</a>
<b>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality.jpg</a> <a href="#">PFE1287459_AirQuality2.jpg</a>
<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>We, the members of the Smithy Bridge and Littleborough Green Belt Group (hereafter SBLGB) assert that the P4E document is not positively prepared. This response is reflective of the collaborative views of and should be considered as being from the 2,147 members of our active group.</p> <p>The plan fails to provide a full picture of developments proposed across the 9 districts and could be perceived as misleading and disingenuous. For example, P4E proposes houses for Rochdale, but this is not a joined-up plan with other developments planned by Rochdale council. The Rail Corridor Strategy proposing to add another "7000 new homes and new employment space"(Rochdale Summary GMTS2040 implementation plan 15.10.20) and Rochdale council allocations plan (setting out proposed sites to build or develop on up to 2028) contains yet more allocations to develop within Rochdale (RBC, 2021). This range of different plans paints a complicated and confusing jigsaw and makes it difficult for residents to establish a clear picture of all developments plan for their local areas.</p> <p>The P4E plan is built on outdated information that does not take into account the significant changes since the second consultation. All 9 districts and the GM combined authority have now declared climate emergencies. The plan does not take this into account, nor does it plan for a sustainable future. For example, air pollution on Smithy Bridge Road adjoining JPA 24 (Roch Valley) regularly reaches "very high"levels, increasing the risk of negative health effects for everyone.</p> <p>[Development will add to air pollution as well as increasing noise and light pollution. Supporting images uploaded emissions and emissions key]</p>

Accelerated urbanisation of rural areas appears to be a significant focus of the plan with the net loss of 1754 HA of green belt land. Significant urban sprawl, destruction of irreplaceable peat mosses, wildlife habitats and significantly impacting rural economies with no suggestion of how these impacts will be reduced or mitigated.

Furthermore, the plan does not provide a commitment to reducing reliance of cars. Developing allocation on green belt land and in rural areas increases greenhouse gas emissions and encourages reliance on cars. Some allocations within the plan (e.g., Carrington Moss) include the building of new roads and dual carriageways. Allocations should be close to public transport hubs and not increase car usage or reliance into areas with very high levels of air pollution.

The SBLGB group propose the P4E plan is not positively prepared for those in need of housing. Housing the Powerhouse (2018) suggests there are more than 80,000 people waiting for social housing in the Greater Manchester area. Furthermore, Housing the Powerhouse (2018) identifies that 34% of young working adults in GM cannot afford to buy a property. The P4E document aims to build just 30,000 homes that are social or affordable whereby the majority of proposed green belt allocations plan to build luxury 4- and 5-bedroom properties. Given that the average housing occupancy rates average at 2.38 people per house and single person households are expected to grow rapidly over the next 8 years (ONS, 2020). Luxury houses on rural and semi-rural green spaces do not fit with the housing need or climate and environmental considerations.

Given the recent disruptions to trade and supply chains; protection of versatile agricultural land should be paramount to allow future generations the facility to produce local food supply options (reducing carbon footprint, greenhouse emissions and burden of transnational supply). Allocations such as JPA 22 (Land North of Smithy Bridge) propose developing 300 luxury houses and a primary school on a working cattle farm.

The P4E continues to include significant release of green belt land (1754 HA) to meet the calculated housing need of 164,880 dwellings for the plan area, despite identified available land supply across all 9 districts to build 170,000 homes without any release of green belt land. As such, large and medium windfall sites could be included to add even more flexibility and choice to meet the housing need without releasing green belt land (strategic housing land availability assessment, Rochdale Council, 2020).

#### Flood risk and water environment

The document states (p5.35 pp95) that "the aim of the sequential and exception tests is to steer new development towards areas with the lowest risk of flooding first, before considering higher risk locations". The SBLGB group do not believe the P4E plan to be compliant with allocations such as JPA24 (Roch Valley) known flood plains, given that the GM area covered by the plan has an excess land supply in relation to the government identified housing need, and that the P4E document acknowledges that climate change is expected to "significantly increase peak river flows and surface water run-off as a result of more intense rain events" (p5.33 pp94); the SBLGB group does not think it is justifiable to build homes on any areas that are flood plains or above the lowest risk of flooding while other brownfield and lower risk sites are available.

The plan also fails to be compliant with the national planning policy framework (2021), as highlighted above the proposals do not avoid damages to the environment and climate and the proposed development on green belt land in rural and semirural areas will result in increased air pollution, light and noise pollution, flood risk and greenhouse gasses.

Furthermore, in order to develop the 1754 HA of green belt land proposed in the plan requires changing established green belt boundaries, which should

only be altered in exceptional circumstances (sec 140). Before concluding that such exceptional circumstances exist to justify the changes to the green belt boundaries, the strategic policy making authority should be able to demonstrate it has examined fully all other reasonable options for meeting it"s identified need for development (sec 141). The P4E plan appears not to comply with the NPPF as development is proposed which would result in the net loss of 1754 HA of green belt land when there is available land supply across the 9 districts to build 170000 houses without any release of green belt.

The SBLGB group propose the plan is unsound as it plans to build more houses than are required. The government formula for calculating housing need results in a requirement of 164,880 dwellings for the plan area. The housing topic paper (p6.12 pp57) identifies sufficient land availability within the existing urban area to more than meet this need (170,385 dwellings) in addition a need to ensure "flexibility and choice" to ensure deliverability has led to proposals of additional green belt release to allow for 190,752 dwellings in total. Using the average housing occupancy (ONS, 2020) this would result in a population increase of 450,000.

Projects from the Housing Topic Paper (p6.24, pp60) estimate the population of the plan area to increase by just 158,194 people, meaning the requirement for homes could be as low as 66,500 resulting in sufficient flexibility and choice without green belt release.

Very limited attempts have been made to engage with those who will be most affected, arguably the younger generations and those who will be directly impacted by the developments. No additional public consultation was held after Stockport"s withdrawal and revisions to the plan. Both the 2016 and 2019 consultations and publicity were inadequate with consultation portals difficult to navigate and hundreds of documents to negotiate

The 2016 consultation contained may disingenuous and misleading statements about reduction of green belt loss without recognising that this would include public parks being redesignated as green belt sites to offset true green belt losses, with additional removals of green belt allocations (such as the Land off New Street, Littleborough) which had already been granted planning permissions and now stands as an active development site and works continue today, on the building of nearly 100 luxury homes. The vast majority of public awareness has been raised by the work carried out by the "Save Greater Manchester Green Belt Groups".

<p><b>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.</b></p>	<p>Inclusion of all proposed developments across each district for the period of the plan to provide an open and clear picture of the scale and scope of the proposed developments</p> <ul style="list-style-type: none"> <li>-The removal of all green belt allocations from the plan</li> <li>-The removal of all allocations of land above the lowest level of flood risk</li> <li>-A full review of the plan taking into consideration the climate emergency and implications of Brexit, supply chain disruptions, food shortages and the CoVID-19 pandemic with a view to reducing urban sprawl, rural and semi-rural developments</li> <li>-A review of green belt and rural and semi-rural allocations to ensure they meet the needs of affordability and housing occupancy</li> <li>-Review the plan with a view to redevelopment of excess shop units and office space in town centres as potential housing allocations</li> </ul>
<p><b>Given Name</b></p>	<p>Save Littleborough Greenbelt</p>
<p><b>Company / Organisation</b></p>	<p>Smithy Bridge &amp; Littleborough Save the GreenBelt Group</p>
<p><b>Person ID</b></p>	<p>1287459</p>
<p><b>Title</b></p>	<p>JP-G 1 Valuing Important Landscapes</p>

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<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality2.jpg</a> <a href="#">PFE1287459_AirQuality.jpg</a>
<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 2 Green Infrastructure Network
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality.jpg</a> <a href="#">PFE1287459_AirQuality2.jpg</a>
<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 3 River Valleys and Waterways
<b>Type</b>	Web
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<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound

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<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 4 Lowland Wetlands and Mosslands
<b>Type</b>	Web
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<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 5 Uplands
<b>Type</b>	Web
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<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 6 Urban Green Space
<b>Type</b>	Web

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<b>Include files</b>	<a href="#">PFE1287459_AirQuality.jpg</a> <a href="#">PFE1287459_AirQuality2.jpg</a>
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<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 7 Trees and Woodland
<b>Type</b>	Web
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<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 8 Standards for Greener Places
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality.jpg</a> <a href="#">PFE1287459_AirQuality2.jpg</a>
<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

## Places for Everyone Representation 2021

<b>Compliance - In accordance with the Duty to Cooperate?</b>	No
<b>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality2.jpg</a> <a href="#">PFE1287459_AirQuality.jpg</a>
<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 10 Green Belt
<b>Type</b>	Web
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<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JP-G 11 Safeguarded Land
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality2.jpg</a> <a href="#">PFE1287459_AirQuality.jpg</a>

Places for Everyone Representation 2021

<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>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JPA 22: Land North of Smithy Bridge
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality.jpg</a> <a href="#">PFE1287459_AirQuality2.jpg</a>
<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>It is the view of the SBLGB group that the GMCA and Rochdale MBC may have just met the standards of legal compliance and achieved the minimum duty to co-operate. However, much more could have been done to effectively consult the Rochdale public. The name given to this allocation is misleading to the public and avoids naming Heald Lane Farm and acknowledging the proximity to lake bank.</p> <p>The site is a working cattle and poultry farm. Given the recent food shortages and supply chain disruptions, destroying rural economies and agricultural land with no mitigation and when there are brownfield and urban alternatives sites identified, it is unjustifiable to develop this site.</p> <p>The land is crossed by several public footpaths and provides a green corridor for walkers, cyclists, and wildlife. The footpaths are used very frequently. Furthermore, the land provides a green boundary between Smithy Bridge and Littleborough.</p> <p>To the northeast of the site lies the former Akzo Nobel site, which has planning permission pending for 169 homes. This development should be acknowledged within this allocation as the 2 sites will be side-by-side.</p> <p>The proximity of this site to the former Akzo Nobel site also raises concerns over contamination. The (21/01146/FUL) indicates credible contaminants on the site, however the topic paper does not consider the high level of asbestos identified on the neighbouring Akzo Nobel site (21/01146/FUL,</p>



Site Investigation Review document: carried out by E&P). Any development on this allocation would require proper screening for asbestos and other contaminants which may also affect deliverability of the site. The risks to end users here is high and when we consider this isn't merely homes but also a primary school, there are significant risks that need to be considered.

The land also contains a pond, unfilled water features, a former quarry and former colliery. Development of the site may disturb ground water sources. Effectively managing these ground conditions will be essential to developing this site. Further detail on the safety of the site should be provided before the allocation could be considered viable and justifiable.

The topic paper advises that flood risk on the site should be mitigated without providing any detail on how significant such a risk may be. Local residents have raised concerns about standing water and localised surface water flooding on and proximal to the site. Given that there is also a large pond on the site and nearby water courses, not enough information is provided to conclude if the site complies with P4E objective 2 or the NPPF (chap 14). However, building on green belt land will remove ground and trees that provide valuable flood plains to soak up surface water.

The allocation is identified as being within the foothills of South Pennines. The Pennines and nearby Hollingworth Lake both serve as popular tourist attractions. Development of this site is likely to have a recreational disturbance on tourists and walkers using the area. There will also be significant detrimental impact on the features of the rural area and the river. Section 18.2 of the topic paper notes that development of the site may indirectly disturb specifically protected species and protected habitats.

The site fails to comply with P4E objectives 7 & 8 and 6 out of 7 of the site selection criteria. The site is also not consistent with sustainable development and chapter 13 of the NPPF. As there is no unmet housing need to justify building on protected green belt land.

The site does not identify exceptional circumstances that would justify the redesignation of the land from its green belt status. Furthermore, there is no evidence that all other reasonable options have been explored. Many brown field and potential urban allocations have not been considered and should be developed before any green belt release is considered.

The site fails to comply with P4E objective 7 and is not consistent with NPPF (chap 2, para 8 & 9). The site proposes to build 300 luxury and executive homes 3-, 4- and 5-bedroom homes, which is likely to increase cars by around 600 (ONS 2020). The local highways are already at capacity and overburdened at peak times. Concerns in relation to congestion, air pollution from idling vehicles (which is already very high at peak times), and pedestrian safety already exist in this area and there is no evidence that the development of this allocation could remediate these concerns.

Despite a nearby bus service, the provision is limited. There is a tram station over 3.7km away but there is no direct bus route from Littleborough or Smithy Bridge to the Milnrow tram station (Station Road, Milnrow). The train station of Littleborough is nearby but the network is already at capacity at peak times and there is no detail in the plan that suggests this could be improved to support this development, the 169 homes proposed to adjoin this site and the 7000 houses proposed along the railway line throughout Rochdale (Rochdale Rail Corridor Strategy). Mitigating this overcapacity rail service in Littleborough and Smithy Bridge is not as straightforward as increasing the service. The train line has a level crossing at Smithy Bridge Road. At peak times with the current train service and unmanned signal box, the level crossing barriers can be down up to 32 minutes of an hour. This adds significantly to traffic congestion and emissions from idling cars on Smithy Bridge Road and the adjacent primary school making, in our view, this site unsuitable for development.

	<p>The supporting reports and topic paper lack important details and raise questions as to whether they are fit for purpose or robust. The reports do not meet NPPF 140 &amp; 141 5 to suggest that there are exceptional circumstances that would warrant the allocation from the green belt boundaries changing.</p> <p>The site fails to comply with P4E objective 2. The allocation plan releases green belt land without demonstrating exceptional circumstances (NPPF 140 &amp; 141). The development will cause urban sprawl linking the distinct village of Smithy Bridge with Littleborough.</p> <p>The site fails to comply with P4E objectives 7 &amp; 8. The development of luxury and executive homes on green belt land is not in keeping with sustainable patterns of development. The high value of the properties is likely to attract commuters and the over capacity train network is likely to result in more cars on already congested roads. Furthermore, developing this allocation will not "improve the quality of our natural environment and access to green spaces" (P4E objective 8). Developing this allocation will reduce access to green spaces and remove the valuable green corridor between the Rochdale canal and Hollingworth Lake.</p> <p>The site fails to comply with objective 10 of the P4E mission statement. There is no reference to any new infrastructure or services. Traffic congestion and the impact of the level crossing on Smithy Bridge Road already impact emergency services response times significantly above the national average (Nuffield Trust, 2021). As previously outlined the unnecessary release of green belt for development will increase air pollution, in areas where road congestion already causes very high levels of air pollution.</p>
<b>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.</b>	Remove the site from the allocations
<b>Given Name</b>	Save Littleborough Greenbelt
<b>Company / Organisation</b>	Smithy Bridge & Littleborough Save the GreenBelt Group
<b>Person ID</b>	1287459
<b>Title</b>	JPA 24: Roch Valley
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287459_AirQuality2.jpg</a> <a href="#">PFE1287459_AirQuality.jpg</a>
<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>It is the view of the SBLGB group that the allocation is unsound. Firstly, the name to the site is misleading, the site is named "Roch Valley" rather than being identified as within Smithy Bridge. The land is currently used as grazing for cattle. Given the recent food shortages and supply chain disruptions, destroying rural economies and agricultural land with no mitigation and when there are brownfield and urban alternatives sites identified, it is unjustifiable to develop this site.</p> <p>The site is bordered by residential developments to the north and east and open countryside to the south and southwest. The River Roch runs along the south of the site and Smithy Bridge Road along the side.</p> <p>Smithy Bridge Road is already congested with air pollution from idling cars reaching very high levels.</p> <p>The site houses underground sewage tanks installed by United Utilities. Local residents report that the tanks are regularly attended by United Utilities.</p> <p>The site fails to comply with P4E objective 2 and is not consistent with NPPF chapter 14. The topic paper (p4.2) indicates that the allocation is not at risk of flooding, however this is contradictory to the Environmental Agency and Rochdale Metropolitan Borough Council, who have identified the land surrounding the River Roch as a location where flood water storage capacity should be safeguarded.</p> <p>The papers have no clarity or detail around the scale of flood water storage needed or where within the site this might be located. The allocation is adjacent to the River Roch, which frequently floods. Surface water in the valley on Smithy Bridge Road frequently causes disruption to traffic. There are not enough details nor evidence to suggest that the site is safe and suitable to accommodate a development of such scale, without causing flood risk to end users and existing residents in the vicinity or increasing flood risk further downstream.</p> <p>Furthermore, the southern portion of the allocation is within Flood Zone 3m given the availability of urban and brownfield sites to meet the housing need, developing on this allocation would be unjustified. Significantly the potential risk of run-off polluting or contaminating the River Roch does not seem to have been given any consideration.</p> <p>Despite a nearby bus service, the provision is limited. There is a tram station over 3km away but there is no direct bus route from Littleborough or Smithy Bridge to the Milnrow tram station (Station Road, Milnrow). The train station of Smithy Bridge is nearby but the network is already at capacity at peak times and there is no detail in the plan that suggests this could be improved to support this development and the 7000 houses proposed along the railway line throughout Rochdale (Rochdale Rail Corridor Strategy). Mitigating this overcapacity rail service in Littleborough and Smithy Bridge is not as straightforward as increasing the service. The train line has a level crossing at Smithy Bridge Road. At peak times with the current train service and unmanned signal box, the level crossing barriers can be down up to 32 minutes of an hour. This adds significantly to traffic congestion and emissions from idling cars on Smithy Bridge Road and the adjacent primary school making, in our view, this site unsuitable for development.</p> <p>Route used to walk to school. Safety of our children using the route to travel to school. Addition of extra cars will increase pollution and risk to health. While this allocation is not designated green belt, it is protected open land which provides an important wildlife corridor which also prevents urban sprawl by providing a functional green space between Hurstead and Smithy Bridge.</p>

The allocation is identified as being within the foothills of South Pennines. The Pennines and nearby Hollingworth Lake both serve as popular tourist attractions. Development of this site is likely to have a recreational disturbance on tourists and walkers using the area. There will also be significant detrimental impact on the features of the rural area and the river. Section 18.2 of the topic paper notes that development of the site may indirectly disturb specifically protected species and protected habitats.

Deliverability: It is noted that this site is not included within the strategic viability report (Stage 2 allocated sites visibility report, Oct 2020). The site is the subject of a live planning application (19/00881/FUL) and remains awaiting a decision despite a lack of robust evidence demonstrating the site is suitable to be developed.

The site fails to comply with P4E objectives 7 & 8. The development of luxury and executive homes on protected open land is not in keeping with sustainable patterns of development. The high value of the properties is likely to attract commuters and the overcapacity train network is likely to result in more cars on already congested roads. Furthermore, developing this allocation will not "improve the quality of our natural environment and access to green spaces" (P4E objective 8). Developing this allocation will reduce access to green spaces and remove the valuable green corridor between the Hurstead and Smithy Bridge.

The site fails to comply with objective 10 of the P4E mission statement. There is no reference to any new infrastructure or services. Traffic congestion and the impact of the level crossing on Smithy Bridge Road already impact emergency services response times significantly above the national average (Nuffield Trust, 2021). As previously outlined the unnecessary release of green belt for development will increase air pollution, in areas where road congestion already causes very high levels of air pollution.

Furthermore, the site fails to comply with P4E objective 7 and is not consistent with NPPF (chap 2, para 8 & 9). The site proposes to build 200 luxury and executive homes 3-, 4- and 5-bedroom homes, which is likely to increase cars by around 400 (ONS 2020). The local highways are already at capacity and overburdened at peak times. Concerns in relation to congestion, air pollution from idling vehicles (which is already very high at peak times), and pedestrian safety already exist in this area and there is no evidence that the development of this allocation could remediate these concerns.

**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.**

Remove this site from the allocations