

<b>Family Name</b>	Clarkson
<b>Given Name</b>	Vivienne
<b>Person ID</b>	1286811
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Clarkson
<b>Given Name</b>	Vivienne
<b>Person ID</b>	1286811
<b>Title</b>	JPA 19: Bamford / Norden
<b>Type</b>	Web
<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>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<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>Housing Need in Rochdale</p> <p>The Local Housing Need in Rochdale is approximately 8,000 and land is available in the borough for these 8,000 houses. Therefore, RMBC have no unmet housing need to justify building an additional 4,000 houses on green belt / green field land in Bamford and Norden.</p> <p>There is no acute shortage of large detached executive homes in Rochdale and certainly not in Bamford or Norden, the acute shortage in Rochdale is for truly affordable homes which are close to existing transport links and retail areas.</p> <p>The only reason for the site's inclusion is that it will be built on in priority to brownfield sites due to its potential for significantly higher profit margins for the developer and increased council tax returns for RMBC.</p> <p>In this instance, PfE is not positively prepared as it is not consistent with achieving sustainable development.</p> <p>The site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter</p> <p>The site is not positively prepared, not justified and not consistent with national policy</p> <p>Building Density</p> <p>Unbelievably Rochdale MBC have not planned to build all their housing sites at the correct specified densities in the NPPF, therefore they are not making use of effective land. Currently the sites available within 400 and 800m of transport hubs could accommodate up to 500 more houses which would effectively protect green belt sites.</p> <p>This site is one of the lowest densities in PfE and as noted above, the proposed 450 homes could easily be accommodated by increasing densities on brownfield sites closer to existing infrastructure (existing local rail/Metrolink</p>

services and retail outlets), a much more sustainable proposition but probably not as lucrative for the developers or RMBC.

Therefore in relation to building density the site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapters 2, 11 and 13 and as a result the site is not justified and not consistent with national policy.

#### Local Traffic

The area has suffered with significant reductions in public transport links into Manchester and beyond for the past twenty years and the site is not accessible to either the Metro or local train stations therefore all additional residents in this area will have no alternative other than to use their cars, a situation which is not sustainable.

The existing roads are already congested with long queues being present on Edenfield Road through Norden, on Norden Road and on War Office Road, Bury and Rochdale Road and Queens Park Road on weekday mornings and afternoons, this as a result of previous house building in the area without any increase/improvement in the transport infrastructure since the 1960"s. These roads will not accommodate the extra traffic created by an additional 900 cars which in reality is likely to increase the vehicle movements in the area by 4,000 per day, the current traffic assessments are unbelievably optimistic.

Furthermore the allocation does not promote sustainable transport and will as noted above significantly increase single use car journeys and CO2 emissions. In addition there is an air quality management zone within 150m of the site which will become significantly worse if this site is developed.

The proposal to make Norden Road one-way is seriously flawed as it will force all the traffic currently using Norden Road in the opposite direction down the only other alternative route thereby making the air quality significantly worse.

Based on the above the site fails to comply with PfE Objective 7 and is not consistent with adapting to climate change, moving to a low carbon economy and NPPF Chapters 2 (para 8) and 9. Therefore the site is not justified and not consistent with national policy.

#### Schools

It is imperative that there is sufficient availability of choice for school places to meet the local needs and there are no proposals for additional schools on this site and existing schools are already full, therefore any additional educational requirements will further exacerbate the already considerable traffic congestion problems at start and finish times.

Yet again the site fails to comply with PfE Objective 9 and is not consistent with NPPF chapter 8 (para 95) and as a result therefore the site is not justified and not consistent with national policy.

#### Leisure

This site is an important local amenity that is well used, publicly accessible green belt land which also houses Football, Cricket and Tennis clubs on the site .

Removal of green belt protection from the Football, Cricket and Tennis clubs"will significantly increase the likelihood these sites will be developed in the future thereby removing well used and well loved local amenities.

During March 2021 over 2,000 walkers, children, cyclists and riders used the pathways in one week. Building unnecessary unaffordable homes on this land would effectively destroy it as a local amenity and would be a crime against sustainable development and local social needs.

Therefore the site fails to comply with PfE Objectives 7, 8 and 10 and is not consistent with Chapter 8 of NPPF, meaning that the site is not justified and not consistent with national policy.

#### Nature and Wildlife

The site is an important ecological area adjacent to Ashworth valley and supports a vast array of indigenous animal and bird species, including (but not limited to) protected ones such as newts, voles, shrews, bats, badgers, dormice and hedgehogs.

This site has significant environmental and local amenity value and its inclusion will deprive future generations and severely diminish the natural environment.

The site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapter 15.

The site is not justified and not consistent with national policy.

#### Climate Change

Rochdale Council declared a Climate Emergency in July 2019, this is at odds with the building of large executive homes on protected green belt land is inefficient in terms of carbon usage and emissions from vehicles and can only have a negative impact and exacerbate the Climate Emergency.

Large, detached homes built a significant distance away from transport hubs produce circa 4 tCO<sub>2</sub>/year vs urban homes near public transport which produce circa 2 tCO<sub>2</sub>/year, how can RMBC support this proposal will surely increase the effect of the Climate Emergency.

This site does not support a transition to a low carbon future and instead promotes a significant increase in vehicle emissions and is therefore yet again the exact opposite of what is required to reduce the effects of a Climate Emergency.

It is therefore obvious that this site fails to comply with PfE Objective 8 and is not consistent with NPPF Chapters 2, 9 and 14. Therefore the site is not justified and not consistent with national policy.

#### Flooding

The assessment of the flood risk for the site does is flawed, as the site has some degree of flooding every year, sometimes this flooding is severe.

The geological make up of the site is heavy clay and has natural springs running through it as indicated by adjacent road names "Clay Lane" and "The Springs".

Building on protected green belt land means hard landscaping over the majority of the area which currently is open fields and in addition the removal of hedgerows and mature trees that currently assist with drainage will significantly increase the flood risk.

In this respect the site fails to comply with PfE Objective 2 and is not consistent with NPPF Chapter 14 and is not justified, not deliverable not consistent with national policy.

#### Power Lines

The site has two separate overhead power lines supported on steel pylons one of the power lines brings HV electricity from the National Grid into the sub-station at the end of Clay Lane, the electricity is then transformed down and leaves the sub-station along the other line at reduced voltage for local supply to homes and businesses in the area. International studies have proved that close proximity to overhead power lines can be a cause of Leukaemia to children living within 50m of the lines, therefore a proposal to build family homes close to these overhead lines should be viewed with some suspicion during these times of increased understanding of the causes of cancer.

**Redacted modification - Please set out the modification(s) you**

The site fails to comply with PfE Objective 10 and is not consistent with NPPF Chapter 8.

The site is not justified and not consistent with national policy.

**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.**