

Places for Everyone Representation 2021

<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</a>
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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>	- Places for Everyone 2021 (PfE) has been born out of the Greater Manchester Spatial Framework (GMSF), but they are not the same. PfE Section 1.23 states that "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." As a result I do not believe it is reasonable to assume that because GMSF 2020 was deemed legally compliant with the Town & Country Planning regulations that PfE 2021 is similarly compliant. I believe it is not legal and should not proceed.
<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>	This must be established by a proper judicial review. Until proven valid PfE must be not put forward.
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	Our Strategic Objectives

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Type	Web
Include files	<a href="#">PFE1286702_Redacted.pdf</a>
<b>Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:</b>	<p>2. Create neighbourhoods of choice</p> <p>8. Improve the quality of our natural environment and access to green spaces</p> <p>10. Promote the health and wellbeing of communities</p>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	No
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<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>The PfE uses out of date data from 2014 to predict housing needs. More recent data is available (ONS 2018) and no projection for the impacts of Brexit and Covid 19 have been made.</p> <p>Proposed development on greenbelt, There is no proof of exceptional circumstances required in the National Planning Policy Framework to justify this.</p> <p>Development areas proposed around Elton and Unsworth / Simister are full of natural waterways and springs and any housing there would be in a flood risk area and development would impact the water sources.</p> <p>The many recent studies and data which stress the importance of accessible green spaces to mental health have not been adequately considered. Changes in working practices since Covid 19 mean many people work from home and need accessible open green space within walking distance to preserve their wellbeing. Removal of greenbelt is inconsistent with this.</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>	The housing requirements should be recalculated using more recent data and projections and proper "exceptional circumstances" must be provided for any proposed removal of greenbelt or countryside.
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	Other Comments
<b>Type</b>	Web

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<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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>The plan is not Justified. The most up to data has not been used. E.g. the plan uses 7 year old (2014) data to predict housing needs. ONS data from 2018 is available but is not considered, nor is the predicted impact of Brexit and Covid-19.</p> <p>The plan is not justified in the removal of greenbelt, especially around Elton and Unsworth/Whitefield/Simister. There is no proof of the exceptional circumstances required in the National Planning Policy Framework to justify this. In addition the site selection process has not been transparent and the many recent studies and data which stress the importance of accessible green spaces to mental health have not been considered. Changes in working practices since Covid 19 mean many people work from home and need accessible open green space within walking distance to preserve their wellbeing.</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>	Use up to date data for the housing predictions and before any reclassification of greenbelt truly exceptional circumstances must be identified
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	JP-G 2 Green Infrastructure Network
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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

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<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<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>	-The plan is not justified in the removal of greenbelt, especially around Elton and Unsworth/Whitefield/Simister. There is no proof of the exceptional circumstances required in the National Planning Policy Framework to justify this. In addition the site selection process has not been transparent and the many recent studies and data which stress the importance of accessible green spaces to mental health have not been considered. Changes in working practices since Covid 19 mean many people work from home and need accessible open green space within walking distance to preserve their wellbeing.
<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>	Keep the greenbelt. There are no exceptional circumstances to justify its removal
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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>The latest data on housing needs has not been used, I believe the housing requirement is overestimated.</p> <p>Removal of such a large are of farmland and greenbelt is not justified. There no exceptional circumstances which meet NPPFR criteria.</p> <p>The proposed 200 homes off Castle road will severely and adversely impact the area, Castle road is inadequate to support the traffic and the land is full of natural springs and prone to flooding. The comments about drainage and impact on the brooks have not been adequately assessed. The traffic in the area around Castle Road, Croft Lane, Hollins Lane is already too heavy and adding extra development will be detrimental and contrary to the common good.</p>

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	The proposed employment numbers have not been justified, warehousing is predominantly automated and does not require much manpower, therefore the specified number of homes is not required.
<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>	Development on this area of greenbelt, especially the Western end, cannot be justified and must be removed entirely from PfE.
<b>Family Name</b>	Roberts
<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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>The PfE indicates in Para 1.63 point 2 that the most up to date information be used in plan making, so being the most recent Bury's Housing Development Needs Assessment 2020 must be taken into consideration.</p> <p>There are insufficient grounds for removal of greenbelt in this area according to criteria laid down in NPPF guidelines.</p> <p>Impact surveys on wildlife and flora have not been done independently and therefore cannot be relied upon as true or comprehensive.</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 need to develop on greenbelt in this area by using up to date data and make sure wildlife surveys are carried out independently by wildlife organisations or the Department of the Environment.
<b>Family Name</b>	Roberts

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<b>Given Name</b>	John
<b>Person ID</b>	1286702
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1286702_Redacted.pdf</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>There has been poor public consultation, a lack of accessible information and little spent by councils in generating awareness. Interest in the plan has mainly been generated by local protest groups. The public consultations should be repeated, providing clear, understandable information. They should be designed to encourage rather than discourage public input. This form is an example - has anyone who "designed" it ever tried to complete it? You need a degree and a day or two of free time to read and understand any of this!</p> <p>The plan is simply not deliverable, the councils lack the competence, or budget and it should be thrown out.</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>Go back to square 1, use up to date data to project housing and employment requirements and remove all thoughts of developing on greenbelt because there are insufficient exceptional circumstances to warrant it. The area has sufficient brownfield sites to cover the needs.</p>