

Places for Everyone Representation 2021

Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Stakeholder Submission
Type	Web
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Our Vision
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
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>I am not sure that the Plan can be legally compliant since all sections of the plan PforE have changed since GMSF and it appears to have been just "assumed" that the change in name and the changes in content are acceptable in law. It quite specifically CANNOT be the same plan as indicated by the name and the the number of contributing Councils.</p> <p>GMC knowing how controversial GMSF was want to "sell" Pfor E as new, different and changed, yet for legal reasons also want to state that it has not altered in order to meet compliance without a judicial review. Which is it?</p>
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.	<p>A judicial review should be carried out to ascertain the compliance and therefore the legality of the PforE plan. Until compliance is proven the plan should be considered illegal.</p>
Family Name	Taylor
Given Name	Janet

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Person ID	1286643
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<ol style="list-style-type: none"> 1. Meet our housing need 2. Create neighbourhoods of choice 3. Ensure a thriving and productive economy in the districts involved 5. Reduce inequalities and improve prosperity 6. Promote the sustainable movement of people, goods and information 7. Ensure that districts involved are more resilient and carbon neutral 8. Improve the quality of our natural environment and access to green spaces 9. Ensure access to physical and social infrastructure 10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	No
Compliance - In accordance with the Duty to Cooperate?	NA
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.	<ol style="list-style-type: none"> 1. Figures of housing need are 7 years old and prior to Brexit and the national pandemic, They are no longer representative. Very poor public consultation The site selection process has not been adequately supported by evidence either of council minutes or through any substantial meeting of set criteria. The main burden of mass urbanisation has fallen on a relatively small area in Bury instead of across the 6 townships. 2. Discussions at Council meetings suggest that the council has no control over the number of affordable houses and the greenfield sites selected are in prime position to maximise house profits by developers. 3 6 There are no major partners for employment and the "Northern Gateway" is not easily accessible being on the opposite side of Bury by necessity using already heavily congested roads via the bottleneck of Bury Bridge. 9. Inadequate planning of infrastructure, timing and how this will be funded.

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	7.8.10 Massive reduction in the well-used green areas for recreation and well being, We already have access to green spaces the impact will reduce these. The air quality is already poor . Inequalities increased, services diminished.
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.	<p>Use the latest 2018 figures, reassess the areas using the criteria against ALL the suggested sites without prior exclusion. Build what is needed in places which meet the criteria and consult in an open and proper manner with local people.</p> <p>Build homes which are accessible to planned employment areas.</p> <p>Utilise brownfield and do not use 'redesignation' as an excuse to allow developers access to prime greenbelt which should be protected.</p> <p>Give open and clear and detailed reassurances of the planned infrastructure and how this will be funded. Including additional services for health and well being as well as transport.</p> <p>Demonstrate how building on the only green spaces in an urban area will impact on the improvement of air quality and in particular mental health.</p>
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 1 Sustainable Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>I am genuinely concerned about future generations and the impact if this plan goes ahead. It will have a devastating effect on their health and well being as well as future job prospects.</p> <p>The plan will not work for local people and there are no exceptional circumstances whereby building on existing greenbelt will be justifiable.</p> <p>PforE most definitely compromises the lives of future generations. The outcome will be a drop in life chances in direct opposition to the theory of "levelling up"</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in	Each Authority/Council within GM should write its own local plan in full consultation with a very willing local population who also want houses and jobs but in the best, most accessible places and operating a true brownfield first policy. People led not developer led.

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respect of any legal compliance or soundness matters you have identified above.	
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 2 Carbon and Energy
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Villages identified by greenfield boundaries will become central to mass urbanisation. The green spaces currently providing filters for poor air with becomes densely populated housing estates thus reducing open spaces and contributing to increased carbon output and the poor health of future generations.</p> <p>Transport is poor, roads are narrow and due to terraced housing cannot be widened.</p> <p>Large swathes of trees are being cut down to clear land.</p> <p>Plans for "how" existing homes will be improved are scant. Building thousands of new homes in an already built up area filling in all the green spaces will not contribute to the carbon neutral policy.</p>
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.	<p>Make full use of large brownfield sites and small pockets of brownfield land.</p> <p>Look at the regeneration of town centres as living spaces as offices become empty and homes include offices. As more people work and shop from home town centres need to be reassessed and reassigned or they will die. If the focus is only on the few green spaces, mostly filled with woodland and trees we have we lose sight of what is really happening in the mass exodus of town centre offices.</p>
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 3 Heat and Energy Networks

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Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Carbon emissions cannot be reduced by cutting down trees, building on greenbelt and building thousands of additional houses. No matter how energy efficient and carbon sensitive they are they will not improve the air quality or current poor air quality. If travel to proposed work places in the Northern Gateway requires a car journey across towns then this is directly against plans to reduce emissions.
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.	Homes near employment. Either repurposing offices in towns or ensuring travel to work is reduced.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 4 Resilience
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally	Site selection appears to ignore issues with flooding which could impact on existing houses. Lack of public consultation.

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compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
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.	Adequate public consultation would better informed the choice of some sites and provided local people with resilience through increased ownership of developments,
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 5 Flood Risk and Water Environment
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Unresolved flooding issues have been sidelined.
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.	Local consultation.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 6 Clean Air
Type	Web

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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?	NA
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.	I believe our air quality is currently below legal requirements yet thousands of houses are being built in an area already poor for air quality. I do not believe cutting down trees filling in our only green spaces will contribute to improvements.
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.	Smaller groupings of homes on brownfield sites and a direct tree planting policy which should help in years to come even if not now.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-S 7 Resource Efficiency
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	With an increase in rats since Bury Council's disastrous change to the bin collections, I have serious doubts that the Council ability or capacity to manage waste efficiently.

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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.	Waste management has never been talked about in Bury more than it has in the last few weeks!! The managers at Bury Council cannot organise the current bin collections so additional collections don't bode well !
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-J 1 Supporting Long Term Economic Growth
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Due to the changes brought about by the effects of Brexit and Covid I believe these plans are old and somewhat redundant
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.	To build for the future we need to reassess what that future will look like. A comprehensive review needs to be undertaken in the light of the last 2 years.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-J 2 Employment Sites and Premises
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA

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Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	In terms of the Bury area little work appears to have been done on the Northern Gateway site. There are no major partners or businesses or industries identified for employment provision.
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.	Mayor partners for employment need to be identified
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-J 3 Office Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Since the pandemic and so many now permanently working from home this whole plan to create massive areas of office space is redundant.
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.	A review of current empty office space and the identification of actual need should be carried out.

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Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-J 4 Industry and Warehousing Development
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Brownfield sites suitable for housing near to town centres have been covered with warehouses to prevent housing being built there. This has created a situation whereby large vehicles are coming into the town centre unnecessarily.
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.	Build warehouses to meet need not to place hold brownfield.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 2 Green Infrastructure Network
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	NA
Compliance - Legally compliant?	NA

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Compliance - In accordance with the Duty to Cooperate?	NA
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.	The removal of greenbelt for some areas and creation of it in others in the PforE Plan does not appear to meet the National Planning Policy Framework. There is no proof of the exceptional circumstances required in the Framework.
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.	Each local authority needs to devise its own local plan. Bury Authority has little free space to build but can deliver the houses need on brownfield if it was able to deliver a brownfield first policy which it has demonstrated it is not.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 4 Lowland Wetlands and Mosslands
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Information provided by local professionally led groups is at odds with the official reports regarding the extent and breadth of wildlife the green belt supports. Some protected species appear not to have been recorded.
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.	Non partisan, non biased professionally recognised in depth reports re the impact on local/national flora and fauna.
Family Name	Taylor
Given Name	Janet
Person ID	1286643

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Title	JP-G 6 Urban Green Space
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	The green spaces included in Pfor E are a poor substitute for the massive loss of actual wildlife non manicured, non man made open spaces.
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.	Greater adherence to a brownfield first policy to deliver the number of houses needed not foreseen using out of date data. A local plan working the houses around the maximum green spaces not driving through it and offering poor substitutes for the wonderful areas we currently enjoy.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 7 Trees and Woodland
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally	Loss of large established trees and ancient hedgerow which need greater protection. Bury is 12 miles from the city centre and does not require a park in stead of wildlife open spaces.

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compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	
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.	A brownfield only policy based on up to date housing need.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 8 Standards for Greener Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
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>Some areas in the plan stand to lose large masses of greenbelt whilst other more obvious areas were not chosen.</p> <p>No details of how Duty to cooperate will be achieved. Without Stockport it is not acceptable to limit neighbouring Authorities to Stockport in the plan since Bury is neighbour to the huge area Rossendale, Wigan with St Helens and Trafford the Cheshire area,</p>
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.	<p>MCC methodology changes resulted in a 35% uplift for the PforE area. This 35% unfairly has to be met from within the district and not redistributed PforE Joint Committee document July 21 Pg 7 Sec 2.2(ii)</p> <p>https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021_ISSUED.pdf represents a significant change between the GMSF and PforE plans</p>
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity

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Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	I do not believe that building highly concentrated housing developments on previously designated greenbelt will enhance the Biodiversity and Geodiversity. The area around Manchester is being mass urbanised and overdeveloped this can only irreversibly damage the existing rich biodiversity,
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.	The plan does not provide proof of exceptional circumstances required in the NPF to justify use of greenbelt. A local plan is required from each Authority.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-G 10 Green Belt
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Pfor E shows removal of greenbelt protection for some areas and creation of greenbelt in others. It is not justifiable to take half the greenbelt without a reassessment of need. The plan does not meet the 5 purposes set out in National Policy in many areas around Manchester.

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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.	A reassessment of need using the latest (2018) ONS population predictions taking into account the effects of Covid and Brexit. I local plan with lots of public consultation
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-P1 Sustainable Places
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	The level of opposition to this plan indicates the concerns local people have about its "Soundness". Opposition Groups have kept people informed of the facts whilst Authorities and GMC have merely given minimal, one-sided information promoting it. Every response requested has been couched in jargon and misinformation designed to make the local person unable to have their voice heard. Public consultation has been designed to discourage input.
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.	Public consultations should be repeated, and provide clear, understandable information and responses should be designed for ease of use for local people.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-P2 Heritage
Type	Web
Soundness - Positively prepared?	Unsound

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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	As a local resident I feel our heritage is going to be irreplaceably lost and there are still vast numbers in my town that are still unaware of PforE due to the poor consultation process.
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.	Public consultations should be repeated, and provide clear, understandable information and responses should be designed for ease of use for local people.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-P4 New Retail and Leisure Uses in Town Centres
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	Our town centre is dying, more and more shops are closing, offices are empty. Newly built retail areas have never been realised and have remain closed. Areas close to the centre are a mass of warehouses yet building on the greenbelt separating the town from villages is targeted.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in	Reassessment using 2018 ONs population predictions post Covid and Brexit. Review of town centre building usage,

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respect of any legal compliance or soundness matters you have identified above.	
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-P5 Education Skills and Knowledge
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	There is little detail on the wider infrastructure, how it will operate at street level for locals and how it will be paid for. There is little belief in developments in educational provision as our area is already oversubscribed and promises have been made year after year.
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.	The plan needs to be revised to identify how all the infrastructure will be paid. Educational provision, pupil numbers/, distances travelled etc needs further input.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-P6 Health
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound

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Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Provision and access to health care is at its limit and creating dense housing estates in already congested areas is a cause for concern when plans are insufficiently detailed.</p> <p>Loss of green spaces for well-being will be lost and the manicured replacements offered, if they materialise, will be insufficient and a poor replacement.</p>
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.	A strategy to guarantee health services must be provided and clear delivery plan for this aspect of the infrastructure needs to be included.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JPA 9: Walshaw
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>At all stages of the creation of the plan, Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement (bury.gov.uk) Bury Council/ MCC has mounted a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, this has been carried out at the expense of presenting the facts eg I was only informed of actions within my ward not the impact of actions in other wards so I was not party to the bigger picture across the borough. This was done, I believe to minimise the impact and make it appear less significant than it actually is. Residents were not aware of the initial call for sites and only an extremely small amount was spent on making residents aware of the plan and this was disproportionately small (□100 as per the response to a Freedom of Information request) in comparison to the effect it will have upon them. There has been a strong reliance on residents finding things out for themselves via social media and websites and a failure to engage with large groups who are unable to use or not party</p>

to social media and technology. Older people and those from deprived backgrounds have had no access to public internet, eg in libraries, during Covid. This has made these groups adversely and disproportionately affected. This is against the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in place in Bury's Statement of Community Involvement (SCI para 1.7). The planning processes have been wordy, long winded, intrusive and question-led, thus producing an irrelevant response rate. Consultations have been inaccessible in terms of language and terminology used and have been a deterrent to the wide majority of people who in their busy lives have found themselves without the time to complete the reams of paperwork.

National Planning Policy Framework greenbelt protection clauses

Filling in this green belt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c and e.

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.119, page 271 of PfE states of the Walshaw allocation,

"This is an extensive area of land □□ set entirely within the existing urban area. The land is loosely bounded by the urban areas of Tottington to the north, Woolfold and Elton to the east Lowercroft to the south and Walshaw to the west."

There has been no evidence of the existence of exceptional circumstances to justify the alteration of the greenbelt boundaries to allow building on the Walshaw allocation as is required by the NPPF, para 140. To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist, the NPPF requires evidence that all other reasonable options to meet identified need have been considered (NPPF para 141). This must include maximising use of brownfield and underutilised sites and maximising density. Housing need is not an exceptional circumstance to justify the release of greenbelt. Government guidance states that housing need is not a target but merely a starting point and figures can be mitigated upwards or downwards according to local circumstances, eg lack of brownfield, economic shock (Brexit, Covid-19).

Assessments

Virtually all the assessments produced are those drawn up on behalf of developers and are therefore not independent or impartial and open to bias. They appear to substantiate whatever is required and other ecological findings by professional groups are at odds with those provided suggesting there has been a failure to conduct thorough and independent ecological assessments.

Site wildlife, flood risk and other surveys must also be considered potentially biased since they have been carried out by consultancies on behalf of and paid for by developers rather than entirely independent wildlife organisations or the Department of the Environment.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out a non-biased survey of housing need. However, they have a partnership with Greater Manchester

Housing Partnership, an organisation of housing associations, including Six Town Housing in Bury. The assessment was therefore not impartial.

Climate change policy and carbon neutral policy

Places for Everyone proposes employment sites on the other side of the borough from Walshaw on the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport route exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are only accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, again increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate congestion on the roads, simply transferring the problem from one place to another.

Up to date information

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: <https://www.bury.gov.uk/index.aspx?articleid=15866>

Soundness

Site Selection

The site selection process for Bury has been especially opaque. Little information has been given about why other more apparently suitable sites were rejected, or what alternatives were considered. Bury Council admitted in a Freedom of Information response that site selection was decided at a series of informal meetings with no list of attendees or minutes available. This site choice cannot be justified as the most appropriate when no reasonable alternatives appear to have been examined. Alternative options were ruled out too early or were not considered despite other areas having direct motorway access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly against greenbelt assessment criteria. Therefore the inclusion of the Walshaw site cannot be justified:

-The Walshaw site only met one of the criteria for site selection, namely the most general and vague criteria, Criteria 7, land that would deliver significant local benefits by addressing a major local problem (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.4). The only major local problem identified in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. Without the houses, there is not a major problem and the infrastructure proposed would not be needed. This is essentially a cyclical argument and not a specific justification for the inclusion of the site.

NB In the Site Selection Background Paper, Criteria 7 is missing from the table of site selection criteria at pg 18.

-The Walshaw allocation only meets 3 out of 10 of the broad objectives within Section 3 of the PfE plan (Site Allocation Topic Paper JPA 9 Walshaw pg 8, para 5.7):

- Objective 1 - Meet our housing need;
- Objective 5 - Reduce inequalities and improve prosperity;
- Objective 6 - Promote the sustainable movement of people, goods and information.

Again, these objectives could be satisfied by any number of sites in the area.

-The Walshaw site makes a strong or moderate to strong contribution to the purpose of the greenbelt in each of the areas of the Greater Manchester Greenbelt Assessment 2016 (Site Allocation Topic Paper JPA 9 Walshaw, pages 27 - 28, para 15.3):

To check the unrestricted sprawl of large built up areas Moderate-Strong

To prevent neighbouring towns from merging into one another Strong

To assist in safeguarding the countryside from encroachment Moderate-Strong

Preserving the setting and special character of historic towns Moderate-Strong

-Site Allocation Topic Paper JPA 9 Walshaw at page 29 para 15.8 refers to The Green Belt Harm Assessment, 2020 which concluded that the Walshaw allocation makes a moderate contribution to checking the sprawl of Greater Manchester and safeguarding the countryside from encroachment. The allocation also makes a relatively limited contribution to maintaining the separation of Bury and Tottington which are already merged to a significant degree. Release of the allocation would therefore cause moderate harm to Green Belt purposes.

The lack of selection criteria met and the harm that will be caused by the release of the Walshaw greenbelt are evidence of the lack of justification for the selection of this site. In fact, an ex Bury Council leader, David Jones, admitted in writing that sites had been selected due to their sheer size and the ease of implementation of infrastructure, saying,

"the proposed strategy within the GMSF is to release a small number of large strategic sites from the Green Belt as these will provide the scale and massing of development that is needed to enable the viable delivery of the essential major infrastructure to support the development."

The needs of the Walshaw community have been overlooked in favour of mass urbanisation by using this particular site rather than sites on the outskirts nearer motorway access, transport hubs and employment sites. There is too much emphasis on economic growth at the expense of mental and physical health of residents with the benefits of the greenbelt being underestimated.

Infrastructure

The only way in which the funding levels required for infrastructure could be achieved would be through a 5% increase in the price of the properties on the site: Site Allocation Topic Paper- JPA 9 Walshaw pg 44, 45 and 46. Realistically, this makes the infrastructure for the site undeliverable.

"The Three Dragons Viability Appraisal of the allocation has been run using the base model, which showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs, the scheme produces a positive residual value both for the main and the sensitivity test. However, a small increase in house prices of less than 5% would be required to accommodate the full strategic transport costs identified.

26.3 With a small increase in values compared to the base model, the sensitivity test demonstrates that the allocation would be able to support all policy costs including 25% affordable housing and the infrastructure required to support the development, including the strategic transport costs. A 5% increase is considered appropriate for this location as it is in a popular residential area and is closely linked with Walshaw and the areas to the west of Bury where house prices are typically higher than other parts of the town."

There is no guarantee that higher house prices would be achieved. This also suggests that provision of some infrastructure will not be contemporaneous with the building of houses and will only be forthcoming once funds have been raised. This is supported at Site Allocation Topic Paper- JPA 9 Walshaw pg 46 para 27.2 which states that,

"The phasing strategy will be developed through on-going discussions with key stakeholders in relation to infrastructure delivery. The estimated phasing and delivery trajectory will evolve as the plans for the allocation are developed further."

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site unviable.

Insufficient and vague infrastructure for Walshaw has been proposed, with no sources of funding specified. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. We are told by the Council that s106 payments are no longer ringfenced so there is no guarantee that promised infrastructure will be forthcoming.

-Healthcare

There is no specific proposal for additional healthcare facilities. Site Allocation Topic Paper PA 9 Walshaw at page 43, para 25.1 states that,

"Further work will be required to determine whether there is additional capacity within any local healthcare facilities to meet the increased demands arising from the prospective occupants of the new development."

-Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan in place to deal with the increased number of secondary school age pupils. Site Allocation Topic Paper PA 9 Walshaw at page 43, para 24.1 states that,

"The Walshaw allocation is expected to yield approximately 263 primary age pupils and 175 secondary age pupils. Current forecasts show both primary and secondary schools in the

area full to capacity, therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically" (para 24.2)

It is proposed that secondary places will merely be funded from "financial contributions towards off-site secondary school provision" to meet the needs generated by the development (PfE, pg 270). This is not acceptable and will only provide a short term solution. The Elton High School in Walshaw was oversubscribed by 175 places in 2021 and the furthest distance offered from the school was just over 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. If it is proposed that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution (ie an additional secondary school in the locality as well as the proposed secondary school in Radcliffe) needs to be found for them in the immediate area and for the additional primary age children in the area as they move through the education system.

-Transport

"The most significant role which PfE will play in this respect is to locate development in the most sustainable locations which reduce the need for car travel, for example by maximising residential densities around transport hubs." |What are Places for Everyone's proposals for the environment? - Bury Council

Walshaw is not situated near to motorway junctions or to transport or employment hubs, requiring residents to travel across Bury to access them. The only improvement to public transport that is proposed is "a potential upgrade of existing bus services or a new bus service" (PfE pg 270). No new public transport route to employment hubs is proposed.

The proposed new road link will not ease traffic and will potentially create further congestion. As per the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows that the road will start from a mini roundabout on a narrow residential road, cross a busy main road, enter onto Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for two cars to pass safely). The road will be sending traffic to all of the same pinch points this side of the Irwell. It will exacerbate congestion on local roads, which are already highly congested. No account has been taken of the additional traffic which will be produced at the Andrews housing development site just down the road from the Walshaw allocation.

Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in presumption. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of property developers. There is no indication of how they will be made to keep up with targets and what sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Bury Council Eammon O'Brien confirmed that it was "unlikely" that

the proposed building rates for all developments in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) would be met as they were "unrealistic". So the plan cannot be considered to be effective and fails the effectiveness test for Soundness.

Housing requirements

Government guidance is clear that standard housing methodology is just a starting point and can be changed in exceptional circumstances - this has not been thoroughly explored. A lack of brownfield land in the area and in particular the economic shock caused by Brexit and Covid 19 have not been taken into account.

There is insufficient confidence in the accuracy of the predictions in the current uncertain economic climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur once all brownfield has been exhausted. A review mechanism should be built in to only include greenbelt at a later stage if proven necessary. PfE para 1.42 states: "The majority of development between 2021 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield land" PfE favours a brownfield first policy wherever possible as does National Policy. Bury Council have informed the public in Bury that they will implement a brownfield first policy. When questioned at a council meeting on 9/9/21 the Leader of the Councillor Eammon O" Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but claimed that the council have no control over the actions of private developers. In reality they do, as they could limit the release of green belt sites in accordance with National Policy NPPF 134 part e.

Changes to greenbelt boundaries

As part of the overall plan Bury have unfairly redesignated green belt boundaries and allocations to make it appear that more Greenbelt is being saved than actually is. The loss of the Walshaw site greenbelt has been partially offset by creating extensive but unusable greenbelt in other areas without justifying exceptional circumstances. This is not in accordance with National Policy.

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.

The Walshaw site does not meet the site selection criteria and has a strong defense against the greenbelt selection criteria, it is not a suitable site and therefore the only justifiable modification is to remove it from the PforE plan on the basis that it is not legal viable or sound.

Family Name

Taylor

Given Name

Janet

Person ID

1286643

Title

JP-D1 Infrastructure Implementation

Type

Web

Places for Everyone Representation 2021

Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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>Most Bury Councillors have been consistent in their statements about the Council's lack of ability to</p> <ul style="list-style-type: none"> a. put the necessary infrastructure in place to protect local people b. to complete the Plan in the timescale stated <p>The Mayor of Manchester has stated that the Plan is "not right for Bury"</p> <p>Bury Council has failed to consult adequately with the people of Bury and has not responded positively to suggestions.</p>
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.	<p>Devise a local plan with proper local consultation. Building in the best places, enabling the preservation of greenbelt and enhancing existing infrastructure.</p>
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	JP-D2 Developer Contributions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally	<p>Bury Council in collaboration with Manchester CC appear to have been working in collaboration with developers at the expense of working with local people. The Walshaw site will have 4</p>

Places for Everyone Representation 2021

compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	developers. The number of developers enables possible confusion regarding who pays for what where changes to plans will possibly work only in favour of said developers
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.	No building on greenbelt sites until other options are considered following up to date audit using current figures and local consultation. The building on greenbelt would not be necessary.
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Bury - Green Belt Additions
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
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.	The redesignated areas are NOT in any way compatible with the huge loss of greenbelt in P4E goes ahead. Some of the suggestions are laughable if it wasnt so important to local people. Vast fields and areas of beauty with fantastically diverse habitats are being swallowed up by mass urbanisation and the return is just pockets of land mainly unsuitable for building.
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.	Local plan so that the greenbelt areas do NOT need to be redesignated,
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Other Comments
Type	Web

Places for Everyone Representation 2021

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
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Other Comments
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Other Comments
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

Places for Everyone Representation 2021

Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Other Comments
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
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Other Comments
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
Family Name	Taylor
Given Name	Janet
Person ID	1286643
Title	Supporting Evidence
Type	Web