

<b>Family Name</b>	Tunstall
<b>Given Name</b>	Barbara
<b>Person ID</b>	1287574
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Barbara
<b>Person ID</b>	1287574
<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>	No
<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>RMBC Statement of Community Involvement</p> <p>On 5th August 2021 RMBC adopted a new Statement of Community Involvement (see supporting document uploaded) which stated:</p> <p>"1.3 In light of the Government's current guidance to help combat the spread of coronavirus (COVID-19), the Council has undertaken a review of this SCI. As a result, it has been necessary to make temporary amendments to the consultation methods contained in it to allow plan making to progress in line with guidance including requirements for social distancing and to stay at home and away from others. Along with these temporary changes, the Council is also proposing to remove its requirement to consult on future updates to SCIs. There is now no longer a requirement in legislation to consult on updates to an SCI which was confirmed in recent Government Guidance on plan making issued in response to the COVID-19 Pandemic.</p> <p>1.4 We hope to provide appropriate opportunities for engagement by consulting the community where we can, and increasing the ways in which information is made available. We will prepare all future planning documents and determine all planning applications in line with the procedures established by this statement</p> <p>2.4 Meet the legislative requirements for community engagement as a minimum, while considering proactive opportunities to involve the community as set out in the rest of this document;</p> <ul style="list-style-type: none"> <li>- Use the Council's website as the primary point for publicising consultation, hosting supporting information and providing an up-to-date position whenever possible;</li> <li>- Encourage consultation responses to be made electronically, either through the online consultation system or by e-mail, while continuing to receive responses by post if that is necessary (note that electronic responses enable much easier sharing / viewing of consultation responses);</li> </ul>

- Notify Specific Consultees named in the legislation together with others as appropriate electronically by preference (or otherwise by letter if essential);
- Explore opportunities for innovative methods of engagement including virtual exhibitions, digital consultations, video conferencing and use of social media (or other technology), where appropriate, to reach different groups of the community;
- Monitor the use of consultation / engagement methods used including innovative methods to ensure they are effective and if necessary modify them accordingly;
- Make available to view hard copies of all relevant information at the Council Offices and in at least the four main township Libraries (Rochdale, Middleton, Heywood and Littleborough). [In light of the COVID-19 outbreak, it is not currently possible to achieve this. All relevant information will be made available on the Council's website. The situation will be kept under review and modified as required and in accordance with Government guidance.]; and
- Ensure all consultation stages and the methods used are fully inclusive and provide all groups with the opportunity to become involved should they wish to."

These changes to community engagement were passed even though all Covid restrictions ended on the 19th July over 2 weeks before, and as such RMBC have effectively taken the opportunity to exclude several vulnerable groups from planning consultations forever.

For any residents with no internet access the only way they can participate is to go to one of four public libraries to view the few documents available there. I visited Heywood library with my daughter and there was only 2 full copies of the Main Plan document (468 pages long and over 120,000 words), a Statement of Community Involvement and a map of the policies which was illegible. None of the supporting documents were available for me to see and there was no summary to take away and read at leisure. The documents had to be viewed in the library, which would have taken hours to read.

This SCI not only excludes the elderly, but also anyone who relies on a mobile phone for internet access, which many poorer and more vulnerable members of society are forced to do. As the libraries are only open from 9.30 - 4.30 Monday to Friday (ie during normal working hours) anyone who works and does not have sufficient access to internet at home is excluded from this consultation. There were no work-shops and no drop-in sessions as has happened in previous consultations and which are ideal for elderly people. Attempting to make a sensible response to this consultation by sitting in a library to read the documents, or on a mobile phone is impossible and local councillors have received numerous requests for help from bewildered pensioners who are furious about the potential loss of green belt and wish to have their voices heard, but feel unable to access any help or support as they have no internet access.

As a result, certainly in Rochdale and probably in other boroughs, it is considered that the PfE plan is unsound as it has failed to comply with the statutory duty to consult with members of the public as stated in their own SCI:

"2.4 Ensure all consultation stages and the methods used are fully inclusive and provide all groups with the opportunity to become involved should they wish to."

In my opinion the consultation process has been flawed with insufficient community engagement with more vulnerable groups including the elderly and anyone without internet access at home.

Modification required:

The PfE is not deemed to be legally compliant and further community engagement is required in advance of submission of the Plan for Examination to demonstrate that the Plan is sound

JPA 19 - Bamford / Norden Policy

This site is green belt land which is highly valued in the community as it is the last area that has public footpaths and public access. Land on the West side of Jowkin Lane was part of the Bamford Hall Estate and has no public access at all. It is grade 3 agricultural land and the family who own had no idea that Peel Holdings had submitted their land until they started to get phone calls from developers wanting to buy it. There was no consultation with either Peel or RMBC before their land was submitted for development. They are now worried that their land may be Compulsory Purchased against their will as has happened (or been threatened) in South Heywood.

Green belt land is protected land and can only be built on in exceptional circumstances. There is no evidence that exceptional circumstances have been demonstrated to develop this land. This site fails to comply with 6 of the 7 of the site selection criteria and all of the 10 strategic objectives of the PfE. ~In addition, there are sufficient brownfield sites in Rochdale to meet the local housing need and there is a 34ha brownfield site (TBA Ltd) which is in desperate need of remediation and has not been included in the PfE plan. There is no justification to develop greenbelt land whilst there are undeveloped brownfield sites available. If the green belt sites are released there is no incentive for developers to build on brownfield, so residents will lose twice over. We will lose our green belt and we will be left with our ugly brownfield sites.

The PfE is not consistent with NPPF para 140 as the PfE has not demonstrated any exceptional circumstances to release green belt land.

It is not justified as this is the last publicly accessible land in Bamford and is used by many people every day for physical and mental well being.

It is not positively prepared as there is sufficient land available in Rochdale to build all of the local housing need.

It is not effective as it floods badly nearly every year. It is not consistent with NPPf chapter 14.

I wish to request that this site is removed from the PfE.

**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.**

JPA 19 should be removed from the PfE along with all other wholly green belt sites

Modification required:

The PfE is not deemed to be legally compliant and further accessible community involvement is required in advance of submission of the Plan for Examination to demonstrate that the Plan is sound.

Places for Everyone Representation 2021

<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Other Comments
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.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>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.pdf</a>
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Our Vision
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSSimister.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSWalshaw.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 vision for Greater Manchester has been desktop planned without proper engaged consultation from the very beginning. Any consultations that have taken place have been a deterrent asking far too many intrusive questions of residents to put them off completing the consultations have been designed in such a way that they are difficult to respond to for residents with limited I.T skills or digital access. Local councils have not properly published the plan to ensure a place for everyone plan is communicated to everyone. The plan should have been developed by the residents for the residents to address our actual housing requirements over the long term. The above demonstrates a clear lack of community involvement which goes against the spirit of the constitution and makes the preparation of this plan unsound.</p> <p>Legal Compliance</p> <p>-It is questionable whether PfE and the GMSF can effectively be treated as the same thing. This must be decided in court before "Places for Everyone" can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in line with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a number of the plan have seen some form of change." So, is "not insignificant" the same as "substantial"? If the plan is not legal. This can only be established by a proper judicial review. So until a proper judicial review the plan must be considered illegal and not put to Government.</p> <p>Soundness</p> <p>-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population data and must take into account the effect of Covid on work patterns.</p> <p>-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid</p> <p>-There are no partners or industries identified for employment provision. Major partners and industries for employment provision should be identified.</p> <p>-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.</p> <p>-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.  <a href="https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228">https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228</a> The process should be repeated using National and GMCA guidelines for site selection. Meetings with public should be held and minutes should be published. The rationale for the selection/rejection of sites should be available including considered alternatives.</p> <p>-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. There is no indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on delivery. Clear delivery plans for infrastructure should be included.</p> <p>-PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.</p> <p>-In addition to PfE each authority needs to come up with its own local plan. No details are provided about when these plans will be available.</p>

Places for Everyone Representation 2021

	<p>-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal, Stockport will effectively become a neighbouring borough. However, it is not acceptable to limit the plan to Stockport since each of the authorities in the plan is also neighbouring to areas outside of the plan e.g. Bury neighbours with Rossendale, Bolton neighbours Blackburn and Wigan neighbours St Helens and Trafford neighbours Cheshire area.</p> <p>-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for the Manchester City Council area. The revised Local Housing Need methodology states that the need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii) <a href="https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021">https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021</a>) This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.</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>	This plan needs to go back to Regulation 18 of the Town and Country planning act as amended, as it was prepared with proper public engagement and consultation.
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Our Strategic Objectives
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.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>	<ol style="list-style-type: none"> <li>1. Meet our housing need</li> <li>2. Create neighbourhoods of choice</li> <li>3. Ensure a thriving and productive economy in the districts involved</li> <li>4. Maximise the potential arising from our national and international assets</li> <li>5. Reduce inequalities and improve prosperity</li> <li>6. Promote the sustainable movement of people, goods and information</li> <li>7. Ensure that districts involved are more resilient and carbon neutral</li> <li>8. Improve the quality of our natural environment and access to green spaces</li> <li>9. Ensure access to physical and social infrastructure</li> <li>10. Promote the health and wellbeing of communities</li> </ol>
<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>	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>	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
<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>	Please take the time to read in full the supporting documents I have provided to you this plan fails on all the above points.
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Our Spatial Strategy
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSSimister.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSWalshaw.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>	GMCA made the decision to move a poorly prepared plan forward to the publication s and Country planning Act even though major changes have been made to the plan s of consultation. For example Stockport withdrew from what was the GMSF and Manche has had a 35% uplift applied to their housing targets to be met within that specific are the plan has changed significantly and therefore requires going back to proper consulta directly affected to comment further.

<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>	As above the plan needs to go back to proper consultation with the residents of Great
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.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>Legality</p> <p>Failure to comply with Statement of Community Involvement</p> <p>Bury Council have failed to comply with their Statement of Community Involvement Statement of Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no consultation with residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (£100 as per the response to a Freedom of Information request) and the impact of the plan to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of the facts e.g., residents only being told of the plans for their specific ward, and not being told the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, e.g., in libraries, during Covid-19 which has adversely and disproportionately affected older people and those from deprived backgrounds. This is against the SCI 2.4 &amp; 4.17. Countrywide, Covid restrictions are now lifted but restrictions remain in place in Bury's Statement of Community Involvement (SCI para 1.7). Consultation has been inaccessible in terms of language and terminology used and have been a deterrent to participation in the planning process as they have been wordy, long winded, and intrusive. There has been an irrelevant response rate.</p> <p>National Planning Policy Framework greenbelt protection clauses</p>

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Developing a green belt site will create an urban sprawl contrary to NPPF para 137 and para 138 a,b,c, and d.

This proposed allocation will result in the loss of approximately 74 hectares of Green Belt. The Green Belt currently performs strongly in relation to checking the unrestricted sprawl of Green Belt areas and in preventing neighbouring towns from merging. The loss of this land from the Green Belt will therefore clearly result in harm which has not been justified. The case for exception to release this site for development has simply not been made given the lack of suitable and of reasonable alternatives.

To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist 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 increasing density.

#### Assessments

There has been a failure to conduct thorough and independent ecological assessments. Assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent 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. This assessment was therefore not impartial.

#### Climate change policy and carbon neutral policy

Simister and Bowlee currently have illegal air quality readings due to the motorways (M66) surrounding the site. Bury Council have confirmed by email that they are not responsible for the Strategic Road Networks (motorways) and this is Highways England. However, the Council has a duty of care for all residents and should consider all intelligence particularly when it affects the health and wellbeing of local residents.

Highways England provided the readings through a freedom of information request and the readings on the Strategic Road Networks around Simister and Bowlee in 2015/2016 were:

- 75% at illegal limit
- 15% at legal limit
- 10% not full year readings

With the introduction of a 1.2 million square metres of industrial and 1550 homes this will increase already illegal levels of carbon emissions even further.

Point 17 Page 233 of the PfE states we will "incorporate appropriate noise and air quality measures and high-quality landscaping along the M60 motorway corridors and local roads as required within the allocation."

Highways England have already tried this through the Barrier erecting study and it failed and after results were provided and it was confirmed there was no reduction in pollution.

#### Up to date information

The PfE indicates in Para 1.63 point 2 that the most up to date information be used in the assessment so being the most recent Bury's Housing Development Needs Assessment 2020 must be given 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 provided 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 through 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. It is possible that other options were ruled out too early or were not considered despite other areas having suitable sites meeting appropriate criteria.

The Simister and Bowlee allocation only meets 4 out of 10 of the broad objectives within the PFE plan:

- Objective 1 - Meet our housing need.
- Objective 3 Playing our part in ensuring a thriving and productive economy in all parts of Manchester.
- Objective 5 - Reduce inequalities and improve prosperity.
- Objective 6 - Promote the sustainable movement of people, goods, and information.

These and other objectives could be satisfied by any number of sites in the area.

According to the Greater Manchester Green Belt assessment the Simister and Bowlee sites make a strong or weak to moderate contribution to the purpose of the greenbelt in each of the following categories:

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

To prevent neighbouring towns from merging into one another - Strong

To assist in safeguarding the countryside from encroachment - Weak to moderate

Preserving the setting and special character of historic towns - Weak to moderate

However, it is believed the Simister and Bowlee site has been assessed incorrectly and its contributions should be strong or strong to moderate. The definitions below have been taken from the GM Green Belt Assessment document:

-To assist in safeguarding the countryside from encroachment

oStrong - The land parcel contains the characteristics of countryside, has no or very little development, and is open.

oModerate - The land parcel contains the characteristics of countryside, has limited development, and is relatively open.

-Preserving the setting and special character of historic towns

oStrong - The parcel plays a major role in the setting and or special character of historic towns in terms of its physical extent and degree of visibility and/or its significant contribution to special character.

oModerate - The parcel plays a moderate role in the setting of historic towns in terms of its physical extent and degree of visibility and/or its contribution to special character.

Several character areas are included in this allocation, such as National Character Area Pennine Fringe, Simister, Slattocks and Heald Green, as well as Fringe Settled Valley and Settled Farmlands. At paragraph 18.3, the Topic Paper describes the character of the area as undulating pasture and rough grassland, mature trees, hedgerows, woodland blocks and farmsteads etc. These would all be destroyed if the development of this allocation went ahead.

The site can be seen from a number of longer vantage points, as well as in the immediate vicinity. However, due to the scale, form, and nature of the proposed development, visual amenity will be adversely affected. The landscape mitigation proposals will not address these fundamental concerns.

There are numerous key habitats on the site, including wetlands, woodland, grassland and heath. All will be damaged and could be lost as a result of this scheme. Additionally, the scheme will have a significant impact on protected species, including great crested newts, as well as wider ecological value. These impacts have not been adequately considered in the plan. There is no consensus that biodiversity can be achieved at this site, given the extent of loss of existing vegetation and greenspace.

According to the Topic Paper at paragraph 191.0, there will be an attempt to achieve a net gain in biodiversity, but there is no guarantee that it will be delivered. This is contrary to current national planning policy which could jeopardize the allocation. In addition to the impact of the development itself, the proximity of the site area to major highways also raises concerns about air and noise pollution.

The lack of selection criteria met and the harm that will be caused by the release of the Simister and Bowlee greenbelt are evidence of the lack of justification for the selection of this site. In a recent statement, Council leader, David Jones, admitted in writing that sites had been selected due to their proximity to the city and the ease of implementation of infrastructure, saying,

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

The majority of the site is located within flood zone 1 with existing watercourses with boundary and ponds which could pose a risk. Furthermore, given the anticipated scale and the large increase in hard surfacing, there is a serious risk that the site could res adjacent sites as well as localised floods due to increased surface water runoff.

Paragraph 12.2 of the Topic Paper supports these concerns and draws attention to p on groundwater flooding. Given the importance of ensuring that developments are p most appropriate and safe areas, greater consideration of flood risk should be given the Plan process, prior to adoption, to ensure that the allocations are appropriate and Leaving these issues to the design stage is simply inappropriate as they fall to the p development.

The viability of this site is noted to have been calculated with a 25% contribution tow housing in Bury and at 7.5% of GDV in Rochdale. However, because the PfE Plan d the conditions for delivering affordable housing throughout the Plan, it is uncertain w figures are based on correct and reasonable assumptions. The GMCA has determine viable, but there are a number of issues that must be addressed before the site can deliverable.

#### Infrastructure

The Topic Paper supporting this allocation states in paragraph 11.1 that extensive im investment, including a wide range of public transportation enhancements, is require implementation. This aims to prove that the site is unsustainable in its current state ar connected to an existing urban area or community. As a result, the site is deemed un allocation.

In paragraph 11.2, it is confirmed that this development will have a major influence on b and local road networks, both in isolation and in combination with other neighbouring impact on the Strategic Road Network (SRN) is expected to be focused at M60 Juno Junction 19, while the impact on the Local Road Network (LRN) is projected to be cor intersections on the A6045 Heywood Old Road. To facilitate and deliver this site, it is e investment and improvements to the highway network will be required.

These works are of such a scale as to potentially render the scheme unviable. Furth construction will have a major negative impact on current inhabitants, not just due to roadworks during construction, but also due to traffic, increased idle vehicles, and lon once the development is completed.

Investment in public transport is unlikely to be adequate to alleviate these legitimate con when considering the cumulative consequences of all the anticipated growth in the s

Any development within the proposed allocation site would need to assess the requirem social infrastructure (education, healthcare etc). the impact of these contributions on the site also needs careful consideration to ensure that the allocation is in fact delive

To deliver this allocation there are requirements for investment in the transport network provision, school places, health, historic assets etc. All of which could well have a de on the viability and delivery of the site

#### Housing delivery targets

Bury Council have consistently failed to meet housing delivery targets and are now in To be effective a plan must actually be deliverable. The plan relies heavily on the cor property developers. There is no indication of how they will be made to keep up with sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of Eammon O'Brien confirmed that it was "unlikely" that the proposed building rates for a in Bury would be met as they were "unrealistic". So, the plan cannot be considered to fails the effectiveness test for Soundness.

#### Housing requirements

Government guidance is clear that standard housing methodology is just a starting p changed in exceptional circumstances □ this has not been thoroughly explored. A la land in the area and in particular the economic shock caused by Brexit and Covid 19 considered.

There is insufficient confidence in the accuracy of the predictions in the current unce climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only c

	<p>brownfield has been exhausted. A review mechanism should be built in to only include brownfield sites at a later stage if proven necessary. PfE para1.42 states: "The majority of development between 2017 and 2037 (the "plan period") will be on land within the urban area, most of which is brownfield. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has consulted the public in Bury that they will implement a brownfield first policy. When questioned at a public meeting on 9/9/21 the Leader of the Council Eammon O'Brien clarified this statement to say that for anything the council themselves build they would adopt a brownfield first policy. However, that the council have no control over the actions of private developers. In reality they will continue to limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 147.</p> <p>Changes to greenbelt boundaries</p> <p>As part of the overall plan Bury have modified green belt boundaries and allocations. This has made it appear that less Greenbelt is being sacrificed. The loss of the Simister and Bowlee sites has been partially offset by creating extensive but unusable greenbelt in other areas. This is not in accordance with National Policy.</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>	Removal of JPA 1.2 Simister and Bowlee from the plan
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	JPA 7: Elton Reservoir Area
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSSimister.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSWalshaw.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</b>	<p>Elton Reservoir Proposal (JPA-7)</p> <p>-The PfE indicates in Para 1.63 point 2 that the most up to date information be used so being the most recent Bury's Housing Development Needs Assessment 2020 must be given full consideration: <a href="https://www.bury.gov.uk/index.aspx?articleid=15866">https://www.bury.gov.uk/index.aspx?articleid=15866</a></p> <p>-The site selection process for Bury has been especially opaque. Little information has been provided 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 de-</p>

**co-operate. Please be as precise as possible.**

of informal meetings with no list of attendees or minutes available. This site choice ca as the most appropriate when no reasonable alternatives appear to have been exam Reservoir site does not meet the selection criteria laid down in the NPPF or the GMR <https://www.bury.gov.uk/index.aspx?articleid=16330> Radcliffe the location of Elton Reservoir is the least expensive housing in Bury but was selected in preference to sites in other areas where housing is required.

-Para 11.105 p 264 states: " The allocation [Elton Reservoir] is almost entirely surrounded by an existing urban area" Filling this green belt site in will contribute to creating urban sprawl in compliance with National Policy NPPF para 134 parts a,c and e.

-Para 11.105 p 264 states: "Although the allocation has the capacity to deliver a total of 1,900 new homes, it is anticipated that around 1,900 of these will be delivered within the plan period. Nevertheless, it is considered necessary to release the site in full at this stage given that the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development will come forward beyond the plan period". Such gross over release of greenbelt is entirely contrary to National Guidelines, which regards greenbelt as a precious resource not to be squandered. To identify the source of infrastructure funding, indeed shortfalls are expected see para 27.8. Site owners Peel are not specifically mentioned as being a contributor to the infrastructure. Questions should be asked regarding the reasons for Bury Council offering up a huge release of greenbelt at Elton Reservoir that is not required during the plan period (and may never be required) instead of retaining it in accordance with National Policy.

-The Elton site apparently cost Peel £27M (as detailed in the site allocation topic para 260) for 260 hectares (£104K per hectare) as greenbelt. Allowing a conservative price uplift of 10% for green belt conversion to development land, the land for the initial 1900 site becomes worth £875M. Adding in the land for the totally unjustified additional housing beyond the plan period is approx. another £750 M. The implication being that unless Peel get the whole £1.32B they can't offer any upfront funding for the infrastructure. Infrastructure that would not be built if the development does not go ahead. Peel have indicated that they will possibly build the infrastructure will definitely split the site into lots to be developed by other developers so they (Peel) will contribute in this way. It would be left to Bury to extract the funding from other as yet to be identified developers. Bury have a very poor reputation for obtaining developer contributions for infrastructure and developers always try to wriggle out of any obligations. It seems Peel have duped Bury into ignoring National Policy and granting them a huge financial bonus with no commensurate contribution anything.

-Site wildlife, flood risk and other surveys have been carried out by consultancies on behalf of developers rather than entirely independent wildlife organisations or the Department for Environment so must be considered potentially biased. This is particularly important as there are currently problems with the reservoir wall which are being addressed by the Rivers trust. These measures may be suitable for providing some protection to open fields but are not suitable to protect homes from flooding if there is a breach? Such surveys should be entirely independent of benefiter influence.

-As part of the infrastructure a new secondary school for Radcliffe is mentioned. A new secondary school for Radcliffe is already planned funded by the Government. The proposed new school will not even cater for existing Radcliffe pupil numbers. Since the proposed school is indicated as already reserved for the free school we must assume PFE document refers to the school already planned. Regeneration for Radcliffe the location of the Elton Reservoir development is mentioned as part of the infrastructure funding. A regeneration plan for Radcliffe is already in place and we have applied for Government levelling up funding and have stated that even if the application does not succeed the regeneration will go ahead using existing Council money. Bury Council have stated that regeneration and the new school for Radcliffe are not dependent on PFE going ahead. The mention/implication that PFE will contribute to providing a new secondary school (unless the school) and regeneration for Radcliffe must be removed from JPA-7.

-Bury Council have consistently failed to meet housing delivery targets and are now in breach of their obligations. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with their obligations. 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 a new secondary school in Bury (as laid out in JPA7 Elton Reservoir Topic Paper PFE 2021, section 27.8 page 27)

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met as they were "unrealistic". So the plan cannot be considered to be effective. So effectiveness test for Soundness.

-As part of the overall plan Bury have modified green belt boundaries and allocations to make it appear that less Greenbelt is being sacrificed. So the loss of the Elton Reservoir has been partially offset by creating extensive greenbelt in other areas without justifying circumstances. This is not in accordance with National Policy.

-PfE puts the majority of housing in the West of Bury (Elton Reservoir site) while locating the East side of Bury on the M66 Northern Gateway corridor completely the other side of congested Bury. The proposed new link road will not help this problem as it links one site to another.

-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 the plan that they will implement a brownfield first policy; however, they are going for immediate greenfield sites (see JPA7 Elton Reservoir Topic Paper PfE 2021, section 27.9 page 52). When questioned at a public meeting on 9/9/21 the Leader of the Council Eamonn O'Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but that the council have no control over the actions of private developers, in reality they can only limit the release of green belt sites in accordance with National Policy NPPF 134 para 134.

<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>	Removal of JPA 7 allocation Elton Reservoir from the plan
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	JPA 9: Walshaw
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.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</b>	Legality Failure to comply with Statement of Community Involvement

**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.**

Bury Council have failed to comply with their Statement of Community Involvement (SCI) and Community Involvement (bury.gov.uk) at all stages of the creation of the plan. There was no consultation with residents to residents of the initial call for sites and the amount spent on making residents aware of the plan was disproportionately small (£100 as per the response to a Freedom of Information request). There has been to the effect it will have upon them. There has been a deliberate campaign of misinformation and misleading statements to promote and "sell" the Plan to residents, rather than a presentation of facts eg residents only being told of the plans for their specific ward, and not being informed of the bigger picture across the borough, thus giving the impression that the impact is less than it is. There has been an over reliance on residents finding things out for themselves on social media and thus a failure to engage with various groups due to over reliance on the use of social media technology. There has been no access to public internet, eg in libraries, during Covid. This has disproportionately affected older people and those from deprived backgrounds. This is in breach of the SCI 2.4 & 4.17. Countrywide, Covid restrictions are now lifted but restrictions still remain in Bury's Statement of Community Involvement (SCI para 1.7). Consultations have been poor in terms of language and terminology used and have been a deterrent to becoming involved in the planning process as they have been wordy, long winded and intrusive, thus producing a low response rate.

National Planning Policy Framework greenbelt protection clauses

The purpose of the NPPF greenbelt protection is to prevent urban sprawl. Para 11.1 of the NPPF states of the Walshaw allocation,

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

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

There has been no evidence of the existence of exceptional circumstances to justify the greenbelt boundaries to allow building on the Walshaw allocation as is required by para 140. Housing need is not an exceptional circumstance to justify the release of greenbelt land. NPPF guidance states that housing need is not a target but merely a starting point and figures should be adjusted upwards or downwards according to local circumstances, eg lack of brownfield, economic conditions (Covid-19).

To prove that exceptional circumstances to justify alteration to greenbelt boundaries exist requires evidence that all other reasonable options to meet identified need have been exhausted (NPPF para 141). This must include maximising use of brownfield and underutilised sites and increasing density.

Assessments

There has been a failure to conduct thorough and independent ecological assessments. The assessments carried out have been done on behalf of developers and are therefore not independent. Flood risk and other surveys have been carried out by consultancies on behalf of and for developers rather than entirely independent wildlife organisations or the Department of Environment, Food and Rural Affairs so must be considered potentially biased.

The Housing Need Assessment was carried out by Arc4, who were supposed to carry out an independent 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. This 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 the M66 Northern Gateway Corridor, necessitating travel by car as no direct public transport exists or is proposed, thus increasing carbon emissions. Local transport hubs in Bury are not accessible from Walshaw by a car journey or an expensive, unreliable and infrequent bus service, thus increasing carbon emissions. The proposed new link road at Walshaw will do nothing to alleviate the problem of 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 so being the most recent Bury's Housing Development Needs Assessment 2020 must be given 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 provided 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 through a series of informal meetings with no list of attendees or minutes available. This site choice can be seen as the most appropriate when no reasonable alternatives appear to have been examined. It is possible that other options were ruled out too early or were not considered despite other areas having good transport access or being situated nearer to employment sites.

In addition, the Walshaw site performs poorly against site selection criteria and strongly against 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 site selection 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 in Walshaw is the extra traffic that will be created by the proposed 1250 new houses. As there are 1250 houses, there is not a major problem and the infrastructure proposed would not be necessary. This is essentially a cyclical argument and not a specific justification for the inclusion of the Walshaw 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 5 of the Local 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 Green Belt 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 Assessment, 2020 which concluded that the Walshaw allocation makes a moderate to strong 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 the towns of Totton and Tottington which are already merged to a significant degree. Release of the allocation would 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 site from the greenbelt are evidence of the lack of justification for the selection of this site. In fact, an independent councillor, leader, David Jones, admitted in writing that sites had been selected due to their sheer size and 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 support 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 urban development on this particular site rather than sites on the outskirts nearer motorway access, transport links and employment sites. There is too much emphasis on economic growth at the expense of the 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 via a 5% increase in the price of the properties on the site: Site Allocation Topic Paper - 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 case. It showed the allocation would likely require public support to proceed.

The Three Dragons report shows that without a contribution to strategic transport costs, it produces a positive residual value both for the main and the sensitivity test. However, a 5% 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 shows that the allocation would be able to support all policy costs including 25% affordable housing. The infrastructure required to support the development, including the strategic transport costs, is considered appropriate for this location as it is in a popular residential area and is close to Walshaw and the areas to the west of Bury where house prices are typically higher than the rest of the town."

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

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

The plan for infrastructure is therefore unsound as it is undeliverable and thus the site is not viable.

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

#### -Healthcare

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

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

#### -Education

Whilst there is a plan for an extra primary school in Walshaw, there is no feasible plan to deal with the increased number of secondary school age pupils. Site Allocation Topic Paper - 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 are oversubscribed, therefore all additional demand created would require additional school places."

"Cumulative secondary age demand pressures will need to be considered more strategically (Site Allocation Topic Paper - Walshaw 24.2)

It is proposed that secondary places will merely be funded from "financial contributions for secondary school provision" to meet the needs generated by the development (PfE, para 24.2). This is not acceptable and will only provide a short term solution. The Elton High School in Vauxhall is currently oversubscribed by 175 places in 2021 and the furthest distance offered from the school is 1/3 of a mile. Distribution of places in Bury secondary schools for September 2021. It is therefore likely that the Walshaw site will yield an additional 175 secondary age pupils, a more permanent solution is an additional secondary school in the locality as well as the proposed secondary school. The need to be found for them in the immediate area and for the additional primary age pupils 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 at sustainable locations which reduce the need for car travel, for example by maximising

densities around transport hubs." IWhat are Places for Everyone"s proposals for the Bury Council

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

The proposed new road link will not ease traffic and will potentially create further congestion. In the Transport Locality Assessments GMSF 2020, the map at page B9, figure 3 shows the route will start from a mini roundabout on a narrow residential road, cross a busy main road (Lowercroft Road at Dow Lane where the road is steep and very narrow (barely wide enough for cars to pass safely). The road will be sending traffic to all of the same pinch points throughout the town of Irwell. It will exacerbate congestion on local roads, which are already highly congested. No consideration has been taken of the additional traffic which will be produced at the Andrews housing allocation 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 breach. To be effective a plan must actually be deliverable. The plan relies heavily on the cooperation of private property developers. There is no indication of how they will be made to keep up with the targets. No sanctions will apply if they don't. At a Council meeting held on 9/9/21 the Leader of the Council Eammon O" Brien confirmed that it was "unlikely" that the proposed building rates for a new development in Bury (as laid out in JPA9 Walshaw Topic Paper PfE 2021, section 27.4 page 46) were realistic, as they were "unrealistic". So the plan cannot be considered to be effective and fails the 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 available 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 and climate to justify Green Belt loss at the start of the plan. Greenbelt loss should only occur if brownfield has been exhausted. A review mechanism should be built in to only include further loss at a later stage if proven necessary. PfE para1.42 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. The plan favours a brownfield first policy wherever possible as does National Policy. Bury Council has stated to 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 Council Eammon O" Brien clarified this statement by saying that for anything the council themselves build they would adopt a brownfield first policy but that the council have no control over the actions of private developers. In reality they cannot limit the release of green belt sites in accordance with National Policy NPPF 134 paragraph 147.

#### Changes to greenbelt boundaries

As part of the overall plan Bury have modified green belt boundaries and allocations in a way that make it appear that less Greenbelt is being sacrificed. The loss of the Walshaw site has not been partially offset by creating extensive but unusable greenbelt in other areas with the exception of 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.**

Removal of JPA 9 Walshaw from the plan

**Family Name**

Tunstall

Places for Everyone Representation 2021

<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	JP-D1 Infrastructure Implementation
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSSimister.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSWalshaw.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>	Due to the size of the greenbelt sites allocated within the plan it is highly unlikely that t can be provided in good time to bring these sites forward within the plan period. This plan undeliverable within the plan period hence making it unsound.
<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>	Smaller sites should be considered that would come forward faster like brownfield si have substantial infrastructure provided close by.
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	JP-D2 Developer Contributions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.pdf</a>
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound

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<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>	It is very well documented that once a site is approved for development it can be redeveloped with a viability assessment. Local councils have very little control after a site has been approved for houses and it is common practice for a developer to change the number of homes, density, type and number that are classed as affordable. In some extreme cases a developer can claim inflated development costs and no section 106 payments will come forward.
<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>	Local council authorities need to enter into more housing partnership projects and develop their own instead of selling it and losing control. Salford Council has now created its own building company that will deliver affordable homes on land they own and other councils can do the same.
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Bury - Green Belt Additions
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSSimister.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSWalshaw.pdf</a>
<b>GBA Bury - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below</b>	Bury GBA03 Pigs Lea Brook 1 Bury GBA04 North of Nuttall Park Bury GBA05 Pigs Lea Brook 2 Bury GBA06 Hollins Brook Bury GBA07 Off New Road, Radcliffe Bury GBA08 Hollins Brow Bury GBA09 Hollybank Street, Radcliffe Bury GBA10 Crow Lumb Wood Bury GBA11 Nuttall West, Ramsbottom Bury GBA12 Woolfold, Bury Bury GBA13 Nuttall East, Ramsbottom Bury GBA14 Chesham, Bury Bury GBA15 Broad Hey Wood North

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	Bury GBA16 Lower Hinds
<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>	Net greenbelt additions have been nothing but a play on numbers to promote the plan for more greenspace. A lot of the new greenbelt additions are currently not viable for building, they are simply an exercise to take away the protection of greenbelt from useable open greenspace and move them elsewhere in the borough to give the impression that the overall net greenbelt additions are more than is less.
<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>	Leave the greenbelt boundaries unchanged and present the true loss of greenbelt in the plan proposals.
<b>Family Name</b>	Tunstall
<b>Given Name</b>	Susan
<b>Person ID</b>	1287323
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Include files</b>	<a href="#">PFE1287323_SOSWalshaw.pdf</a> <a href="#">PFE1287323_SOSGeneral_Redacted.pdf</a> <a href="#">PFE1287323_SOSElton.pdf</a> <a href="#">PFE1287323_SOSSimister.pdf</a>
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Legal Compliance -It is questionable whether PfE and the GMSF can effectively be treated as the same plan. This question must be decided in court before 'Places for Everyone' can proceed any further. It is a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) without a significant re-write. While the GMSF may have been established as legally compliant (in accordance with Regulation 18 of the Town and Country Planning regulations) and could therefore proceed to final public consultation and submission under Regulation 19 (this current stage) if it was established. If there is any substantial difference in scope between the GMSF and PfE, it is assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states 'The differences between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed a significant number of plan have seen some form of change.' So, is 'not insignificant' the same as 'substantial'?

is not legal. This can only be established by a proper judicial review. So until proven plan must be considered illegal and not put to Government.

Soundness

Soundness

-The plan uses 2014 data to predict housing need and ignores the potential impact of Covid-19. Housing need must be re-assessed using the latest (2018) ONS population take into account the effect of Covid on work patterns.

-There is little detail on how the required infrastructure will be paid for. The plan needs to identify how all the infrastructure will be paid

-There are no partners or industries identified for employment provision. Major partners for provision should be identified.

-There has been poor public consultation, a lack of accessible information and little success in generating awareness. Interest in the plan has mainly been generated by local public consultations should be repeated, providing clear, understandable information designed to encourage rather than discourage public input.

-The site selection process has been opaque with no explanation as to why some sites were excluded from the plan.

[https://mappinggm.org.uk/call-for-sites/#os\\_maps\\_outdoor/16/53.6380/-2.3228](https://mappinggm.org.uk/call-for-sites/#os_maps_outdoor/16/53.6380/-2.3228) The process should be repeated using National and GMCA guidelines for site selection. Meetings with the public should be held and minutes should be published. The rationale for the selection/rejection should be available including considered alternatives.

-Several of the authorities involved have consistently failed to meet housing delivery targets. A plan must be deliverable. The plan relies on the cooperation of property developers. An indication of how delivery targets will be maintained. A strategy to guarantee housing delivery must be provided. This cannot be left to any local authority that is currently behind on targets. Clear delivery plans for infrastructure should be included.

-PfE shows removal of greenbelt protection for some areas and creation of greenbelts. There is no proof of exceptional circumstances required in the National Planning Policy Framework for this.

-In addition to PfE each authority needs to come up with its own local plan. No details about when these plans will be available.

-There are no details of how Duty to Cooperate will be achieved. Following their withdrawal will effectively become a neighbouring borough. However, it is not acceptable to limit the boroughs to Stockport since each of the authorities in the plan is also neighbouring to boroughs outside of the plan e.g. Bury is neighbours with Rossendale, Bolton neighbours Blackburn, Wigan neighbours St Helens and Trafford neighbours Cheshire area.

-A change in the methodology for Manchester City Council was resulted in a 35% up in housing need for Manchester City Council area. The revised Local Housing Need methodology states that housing need is to be met within the district and not redistributed (see Places for Everyone Joint Consultation documentation, 20th July 2021, author Paul Dennett, Page 7 section 2.2 (ii))

[https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE\\_JC\\_July2021](https://democracy.greatermanchesterca.gov.uk/documents/s15613/PFE_JC_July2021)  
This represents a significant change between the previous spatial framework the Greater Manchester Spatial Framework and the current joint development plan Places for Everyone.