Family Name	Bowdler
Given Name	Clare
Person ID	1287369
Title	Stakeholder Submission
Туре	Web
Family Name	Bowdler
Given Name	Clare
Person ID	1287369
Title	Our Vision
Туре	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.	Legal Compliance ? It is questionable whether PfE and the GMSF can effectively be treated as the same plan. Legality must be decided in court before "Places for Everyone" can proceed any further. It is assumed that a transition between a spatial framework (GMSF) and a Joint Development plan (PfE) is acceptable without a significant re-write. While the GMSF may have been established as legally compliant (complies with Regulation 18 of the Town and Country Planning regulations) and could therefore possibly proceed to final public consultation and submission under Regulation 19 (this current stage) PfE legality is not established. If there is any substantial difference in scope between the GMSF and PfE it cannot be assumed that Regulation 18 is Automatically satisfied for PfE. Para 1.23 states "The changes made between GMSF 2020 and PfE 2021 are not insignificant in numerical terms, indeed all sections of the plan have seen some form of change." So, is "not insignificant" the same as "substantial", if it is, the plan is not legal. This can only be established by a proper judicial review. So until proven otherwise the plan must be considered illegal and not put to Government. Soundness ? 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 ? 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

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Family Name	Bowdler
Given Name	Clare
Person ID	1287369
Title	Our Strategic Objectives
Туре	Web
Our strategic objectives	1. Meet our housing need
- Considering the information provided for	3. Ensure a thriving and productive economy in the districts involved
our strategic objectives,	7. Ensure that districts involved are more resilient and carbon neutral
please tick which of	8. Improve the quality of our natural environment and access to green spaces
these objectives your written comment refers	9. Ensure access to physical and social infrastructure
to:	10. Promote the health and wellbeing of communities
Soundness - Positively prepared?	Unsound
Soundness - Justified?	NA
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	sites in accordance with National Policy NPPF 134 part e

Title	JP-S 1 Sustainable Development
Туре	Web
Soundness - Positively prepared?	Unsound
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Title	JP-S 5 Flood Risk and Water Environment
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Title	JP-J 2 Employment Sites and Premises	
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Redacted modification - Please set out the

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Person ID	1287369		
Title	JPA 7: Elton Reservoir Area		
Туре	Web		
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Places for Everyone	Representation 2021
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Title	JPA 9: Walshaw
Туре	Web
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Given Name	Clare
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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.

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Soundness

? 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

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Compliance - In accordance with the Duty to Cooperate?	No